

## 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 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto: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	<input type="text" value="C/O Agent"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="C/O Agent"/>	<input type="text" value="Benjamin"/>
Last Name	<input type="text" value="C/O Agent"/>	<input type="text" value="Wilkinson"/>
Job Title (where relevant)	<input type="text" value="C/O Agent"/>	<input type="text" value="Planner"/>
Organisation (where relevant)	<input type="text" value="Mountpark Logistics EU Sarl"/>	<input type="text" value="Oxalis Planning"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="Oxalis Planning"/>
Line 2	<input type="text" value="C/O Agent"/>	<input type="text" value="Office 3, Toll Bar House"/>
Line 3	<input type="text" value="C/O Agent"/>	<input type="text" value="Landmere Lane"/>
Line 4	<input type="text" value="C/O Agent"/>	<input type="text" value="Edwalton"/>
Post Code	<input type="text" value="C/O Agent"/>	<input type="text" value="NG12 4DG"/>
Telephone Number	<input type="text" value="C/O Agent"/>	<input type="text" value=""/>
E-mail Address	<input type="text" value="C/O Agent"/>	<input type="text" value=""/>

(where relevant)

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## Part B – Please use a separate sheet for each policy or site you wish to comment on

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Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	Please refer to accompanying representation submission document	Local Plan Policy	Please refer to accompanying representation submission document	Policies Map	Please refer to accompanying representation submission document
Site ID	Please refer to accompanying representation submission document				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Please refer to accompanying representation submission document	No	Please refer to accompanying representation submission document
(2) is Sound	Yes	Please refer to accompanying representation submission document	No	Please refer to accompanying representation submission document
(3) complies with the Duty to co-operate	Yes	Please refer to accompanying representation submission document		

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 accompanying representation submission 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.

Please refer to accompanying representation submission document

**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)

**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:

As Agents/Site Promoters acting in relation to the employment omission site 'Ryton West'.

**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.

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

Please refer to accompanying representation submission document
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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>



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# **Rugby Borough Council Proposed Submission Local Plan Consultation (Regulation 19)**

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**Mountpark, Ryton West**

**Land West of Prologis Park, Ryton**

Representations on behalf of Mountpark Logistics EU Sarl

March 2026



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## **1. Introduction**

### **1.1. Overview**

- 1.1.1. These representations are made by Oxalis Planning Limited on behalf of Mountpark Logistics EU Sarl (hereafter ‘Mountpark’). Mountpark is a leading developer of logistics and industrial property in the UK and continental Europe, with a proven record of delivering high quality development in the sector.
- 1.1.2. Mountpark is promoting land west of the A423/A45 Intersection (known as ‘Mountpark Ryton’) for employment purposes. The site is located to the immediate west of ‘Prologis Park Ryton’, on the urban edge of Coventry.
- 1.1.3. The Mountpark Ryton site was proposed to be allocated as part of the wider ‘Ryton West’ draft allocation in the Regulation 18 Preferred Options consultation, but it has been removed from the Regulation 19 consultation and is now considered an ‘omission site’. In place of Ryton West, the Regulation 19 consultation proposes to include land at Walsgrave Hill Farm (WHF), which constitutes a reduction of 60,000sqm of employment floorspace.
- 1.1.4. Mountpark strongly disagrees with the omission of Ryton West from the Regulation 19 Submission Local Plan in favour of WHF. WHF was not taken forward for allocation within the current adopted Local Plan due to heritage, Green Belt and environmental concerns, as assessed by Planning Inspector, which remain pertinent.
- 1.1.5. Further, it is Mountpark’s understanding that the key, and only, justification for the removal of Ryton West is highway concerns stemming from the Council’s Strategic Transport Assessment, which is based on out-of-date modelling and, therefore, makes incorrect assumptions and provides flawed information.
- 1.1.6. Additionally, the Evidence Base work only considers ‘Ryton West’ as a whole and does not consider the Mountpark Ryton site in isolation. Whilst Mountpark continues to work with Prologis on the wider opportunity, there is nothing precluding Mountpark Ryton coming forward as its own discrete allocation. The site could deliver circa 72,000 sqm of employment floorspace, bridging the gap between the reduction in floorspace from removal of Ryton West in place of WHF from Regulation 18 to Regulation 19 stage.
- 1.1.7. The Regulation 19 approach does not secure the delivery of sufficient employment land to account for needs not anticipated in the Plan, flexibility, non-delivery, the fact that the Fraser’s site is not available to the market, and that employment land supply is less than calculated.
- 1.1.8. In this overall context, Mountpark considers that the Council’s approach is flawed, the decision making is unjustified and unsound, and that the Regulation 19, draft submission version of the Local Plan is unsound. These representations set out this position.

- 1.1.9. The Ryton West site sits directly between Coventry Airport’s employment land to the west and the established Prologis Park Ryton to the east. Its immediate context is therefore defined by large-scale and strategic employment development on both sides. Development at Ryton West would read as a continued, logical extension of the existing commercial corridor. Consequently, any potential harm to wider landscape sensitivities, Green Belt openness, or residential amenity would be inherently limited because the site is effectively enclosed by existing built form and strategic road infrastructure.
- 1.1.10. As discussed further within these representations, the development of Ryton West would contribute to the important employment cluster around Coventry Airport, close to the urban edge of Coventry, which would likely be the largest source of employees.
- 1.1.11. Oxalis has previously made representations in response to the Council’s Local Plan consultations, including the most recent Regulation 18 Preferred Options consultation. In the run up to this Regulation 19 consultation process, Mountpark wrote to the Rugby Borough Council Scrutiny Committee, highlighting concerns regarding the decision to remove Ryton West based on the flawed Strategic Transport Assessment.

## **1.2. Representations Structure**

- 1.2.1. These representations are a response to the Rugby Borough Council Submission Local Plan (Regulation 19) consultation and are structured as follows:

Section 2	Sets out our response to the Council’s consultation and includes the following topics: <ul style="list-style-type: none"><li>• The Case Against the Omission of Ryton West</li><li>• The Strategic Suitability of Land at Ryton West</li><li>• The Case Against the Inclusion of Walsgrave Hill Farm</li><li>• Employment Land Need</li><li>• The Mountpark Ryton Site</li></ul>
Section 3	Summarises our representations and sets out our conclusions.

## **1.3. Supporting Information**

- 1.3.1. These representations are supported by the following documentation.
- **Appendix 1** – Masterplan Approach Document
  - **Appendix 2** - Transport Technical Note – Mountpark Ryton
  - **Appendix 3** - Transport Technical Note – Ryton West

## 2. Response to Consultation

### 2.1. The Case Against the Omission of Ryton West

- 2.1.1. The Ryton West omission site plays a crucial role in supporting and expanding the established agglomeration of strategic employment uses focused around Coventry Airport.
- 2.1.2. A fundamental issue concerning the soundness of the Borough's decision-making is the exclusion of the Ryton West site based on potential highways impacts. Paragraph 10.1 of the Rugby Borough Council Cabinet Meeting agenda (6 January 2026) makes clear that Ryton West was omitted following the findings of the Strategic Transport Assessment (December 2025) prepared by SLR. That assessment identified a potential significant adverse impact on queuing at the Toll Bar End Interchange, and this is the sole stated reason for the change in strategy.
- 2.1.3. Mountpark's Highways Consultant has been directly involved in delivering strategic highway improvements in this area over many years, and is therefore well placed to understand the potential impacts of development on the local and strategic network. Their work includes the design of the Toll Bar End roundabout improvements and works to the A45 in this locality.
- 2.1.4. Mountpark and Prologis' highways consultants consider the SLR assessment technically flawed and therefore not a sound basis for changing the Borough's employment strategy. Their detailed review is appended at **Appendix 2** of these representations.
- 2.1.5. In summary, the SLR assessment relies on a pre-Covid model of the Strategic Road Network (SRN) around Coventry that predates both the Gateway Interchanges and the Binley Flyover. These schemes have materially altered base flows and traffic distribution around Toll Bar, improving its operation, and have also shifted queueing previously occurring at Walsgrave further north along the A46. The Gateway Interchange now diverts traffic beneath the A45 directly into the Jaguar Land Rover site rather than via Toll Bar. These critical changes to network performance have not been incorporated in the SLR modelling. As such, the conclusions drawn regarding potential impacts at Toll Bar are not robust and cannot be relied upon as the basis of sound planning policy decisions.
- 2.1.6. Furthermore, the SLR report confirms that National Highways were not engaged with, and neither were Mountpark, to understand whether a mitigation solution could be identified to accommodate development at Ryton West. The report describes only a "*potential*" for adverse impacts. This lack of engagement, coupled with reliance on outdated modelling, means the assessment cannot reasonably be considered robust or conclusive, and cannot inform a strategic change to how the Borough meets its employment land requirements. Additionally, the SLR report only identifies a "*potential*" impact, not a conclusive one. This position is incorrect, and a solution to mitigate impacts at Tollbar is clearly and patently possible.
- 2.1.7. Whilst SLR did not consult National Highways in preparing their work, National Highways have not (known to have) objected to the previous 'Ryton West' regulation 18 draft allocation, and therefore the decision to omit the site on a speculative basis, is unsound.

2.1.8. The ‘Sustainability Appraisal (SA) (December 2025, Aecom) prepared in support of the Rugby Borough Local Plan, sets out the following at paragraph 5.2.34, with regard to the Council’s approach to employment growth options (our emphasis in bold):

*“Whilst there is no possibility of allocating both sites, **it is reasonable to remain open to the possibility of allocating ‘Prologis/Mountpark’ instead of Walsgrave Hill**, i.e. the Draft Plan approach. As part of this, it is important to note that as a larger site it could potentially boost the Local Plan’s contribution to Coventry’s unmet need recognising that, whilst it would be B8 led, the effect of edge of Coventry manufacturing / R&D agglomeration is to suggest very good potential to also deliver non-B8 uses (as per Walsgrave Hill).”*

2.1.9. The SA is therefore clear that the current approach must be reconsidered through the Local Plan adoption process.

2.1.10. Table 6.2 of the SA sets out the high-level assessment of the employment growth options, as below:

- Scenario 1 – the proposed submission approach (Figure 5.3 presented above)
- 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.

**Table 6.2: Employment land growth scenarios appraisal**

Topic	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Accessibility	★1	★1	2	3
Air quality	=	=	=	=
Biodiversity	2	2	★1	★1
Climate change adaptation	=	=	=	=
Climate change mitigation	=	=	=	=
Communities, health & wellbeing	=	=	=	=
Economy & employment	2	★1	3	4
Historic environment	3	★1	2	2
Homes	=	=	=	=
Landscape & townscape	2	★1	★1	★1
Resources	=	=	=	=
Transport	★1	4	3	2
Water	=	=	=	=

- 2.1.11. Table 6.2 of the SA sets out a comparative assessment of the employment growth scenarios, including the option of replacing WHF with Ryton West (Scenario 2). The table demonstrates that Scenario 2 performs strongly across the majority of assessment criteria, and indeed scores higher overall than the alternative scenarios. Mountpark were not consulted as part of the SA assessments.
- 2.1.12. The only area in which Scenario 2 is marked down relates to transport, but this is based on the findings of the December 2025 SLR Strategic Transport Assessment - which, as explained earlier, relies on outdated modelling that pre-dates significant SRN upgrades delivered by National Highways (including the Binley and Tollbar improvements).
- 2.1.13. Because the SLR conclusions are not supported by up-to-date or proportionate evidence, they cannot be relied upon to justify the SA's negative transport scoring. It is therefore necessary for a new, and robust, transport study to be prepared in support of the Plan.
- 2.1.14. Furthermore, with regard to landscape, the SA sets out the following (our emphasis in bold):

*“Landscape – **Walsgrave Hill (Scenario 1) has the highest landscape sensitivity** (“medium”), but work has been completed that shows the potential for mitigation to reduce sensitivity to “medium / low”. North of Houlton is located outside of the Green Belt and has low landscape sensitivity. However, development would urbanise an otherwise quite rural landscape. Whilst there is some adjacent built form, and it would be possible to draw upon topography and Lilbourne Road for some containment, the possibility of ongoing ribbon development along the A5 can be envisaged. The Thurlaston sites risk eroding the landscape gap between Rugby and Thurlaston / Dunchurch, also noting residential wider employment options in this area. Finally, **Prologis/Mountpark is quite well contained and adjacent Prologis Park and strategic road infrastructure act as major urbanising influences.**”*

- 2.1.15. As above, the SA concludes that Ryton West performs favourably in landscape terms, noting that the site is *“quite well contained”* and that adjacent urbanising features, including Prologis Park and the strategic road network, exert a strong influence on its character. Conversely, the SA recognises that WHF has the highest landscape sensitivity (“medium”), with only speculative potential for mitigation to reduce this to “medium/low”.
- 2.1.16. This is a significant point, especially given that the previous Local Plan Inspector concluded the following (Inspectors Report, Rugby Local Plan, 2019, paragraph 72):

*“The A46 on the east side of the city represents a strong, clearly defined boundary. The sites promoted on the edge of Coventry, including WHF, would breach this boundary extending Coventry into the countryside on the eastern side of the A46, causing significant harm to the purposes of the Green Belt in this location in checking the unrestricted sprawl of Coventry and safeguarding the countryside from encroachment.”*

2.1.17. Development at WHF would therefore represent encroachment into open countryside beyond a strong and defensible Green Belt boundary. Given that the site context has not materially changed since 2019, the Inspector’s earlier conclusions remain highly relevant. It is therefore clear that Ryton West, which benefits from a contained and urban-influenced setting, performs significantly better on landscape and Green Belt grounds.

2.1.18. Similarly, the SA sets out the following with regards to historic environment (our emphasis in bold):

*“Historic environment – Walsgrave Hill contains grade II listed Walsgrave Hill Farmhouse and is adjacent to Combe Abbey grade II\* registered park and garden, which contains several listed buildings (grades I, II\* and II) and a scheduled monument. However, there is understood to be good potential to avoid and mitigate impacts. Also significant is the historic environment sensitivity in respect of North of Houlton, with Heritage Impact Assessment (HIA) finding there to be a significance constraint and limited potential for mitigation. It explains:*

*“Development of the site risks harm to the setting of Dunsmore House [a Grade II listed late-19th century manor], through loss or erosion of its historic parkland, the key designed “set-piece” view, and/or the contributions of its wider rural setting. Views from and towards other non-designated heritage assets, including Dunsmore Hall Farm, Clifton Court, and Clifton Hall could be affected in a similar manner. Incongruous features could be introduced to views from the scheduled monument, creating further distractions to the panoramic viewpoint.”*

*Finally, the Thurlaston sites are close to two conservation areas but there would be separation, and it may be possible to avoid HGVs routing through the historic centre of Dunchurch. As discussed, there is a need to carefully consider long term growth strategy for this area accounting for nearby South West Rugby.*

***In conclusion, there is a need to flag a concern with Walsgrave Hill given the significance of the designated assets ahead of consultation on mitigation”***

2.1.19. The Council’s own evidence is clear in that there is a need to “*flag a concern with Walsgrave Hill*”. The Council, therefore, cannot consider the draft allocation to be sound.

2.1.20. The SA acknowledges that WHF lies adjacent to nationally important heritage assets, including Coombe Abbey (Grade I) and the Coombe Park Registered Park and Garden (Grade II\*). Despite this, no Heritage Impact Assessment or evidence has been provided to demonstrate how harm would be avoided or mitigated. In the absence of clear and convincing justification, the proposal is contrary to NPPF 2024 Chapter 16. Without clear and convincing evidence, as required by NPPF 2024, the allocation cannot be justified.

2.1.21. The Inspectors Report (2019), sets out the following in respect of heritage impacts at WHF (para 3.103):

*“the extent of the potential impact on the adjacent Coombe Abbey both in the respect of the historic and nature designations that it benefits from remain uncertain.”*

2.1.22. In 2019, the Inspectors therefore recognised that the potential impacts from the development of WHF towards heritage assets are uncertain. This position remains as no further such information has been published.

2.1.23. In accordance with NPPF (December 2024) paragraph 33 and footnote 18, Sustainability Appraisals must meet relative legal requirements. In particular, footnote 18 clarifies that this relates to The Environmental Assessment of Plans and Programmes Regulations 2004.

*“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”*

2.1.24. The SA fails to meet legal requirements in accordance with the Environmental Assessment of Plans and Programmes Regulations (2004) because it has not been informed by a sufficiently robust evidence base, nor has it adequately assessed reasonable alternatives, as required by Regulation 12 (2), and Schedule 2.

2.1.25. Government Guidance on SAs (018 Reference ID: 11-018-20140306) sets out that (our emphasis in bold):

*“The sustainability appraisal needs to **consider and compare all reasonable alternatives as the plan evolves**, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area”*

2.1.26. As above, SAs are required to pursue alternative options to reduce or eliminate significant adverse impacts. The SA is clear by stipulating ‘there is a need to flag concern with Walsgrave Hill’ in respect of heritage impacts. Contrary to NPPF Paragraph 33, if the Council were to pursue with the WHF allocation, they would do so in acknowledgement that there is such concern with the site, and approach. When an alternative site exists that would not pose the same potential harm, proceeding as such would not accord with the NPPF where such impacts should, and can, be avoided. This approach is therefore unsound.

2.1.27. The aforementioned concerns regarding the deliverability of the WHF site, were for a mixed-use development, the majority of which was housing-led. The draft allocation is solely for employment, resulting in higher-density development, and significantly taller buildings. Where Natural England, Historic England, and the 2019 Inspector’s strong concerns regarding the appropriateness of the site remain for a mixed-use scheme, without any further evidence, it

can be reasonable to assume that the 2019 position remains, and concerns could be even greater given the nature of the development proposed.

- 2.1.28. As discussed towards the start of section 2, where Transport evidence is insufficient for the Plan to be considered ‘sound’, discounting the ‘Transport’ category from the SA review, clearly results in Ryton West (scenario 2) being the most favourable approach to the employment strategy.
- 2.1.29. Table 6.2 (above) of the Dec 2025 SA clearly sets out that Ryton West (scenario 2) is preferable from a historic environment, landscape, economy and employment, point of view. It is also assessed as equal regarding biodiversity, and accessibility. The only criteria that Ryton West (incorrectly) falls short against WHF, is with regards to highway impacts, which we unequivocally disagree with for reasons set out in these representations and appendices.
- 2.1.30. The Council’s own evidence, where highways work is insufficient, therefore identified that Ryton West is clearly the most favourable option.
- 2.1.31. The potential significant harm identified by the 2019 Inspector, Historic England, Natural England, and Rugby Borough Council where their own SA identifies “*a need to flag a concern with Walgrave Hill given the significance of the designated assets*”; when considered against Ryton West which is considered “*quite well contained and adjacent Prologis Park and strategic road infrastructure act as major urbanising influences*”, (SA), clearly is the incorrect option for allocation.
- 2.1.32. The *Green Belt Contribution Study, Stage 2* (December 2025) provides a second-stage assessment of the Green Belt following the earlier strategic analysis. However, this assessment remains broad-brush and does not appropriately consider the specific context of the Ryton West site, including the influence that neighbouring development would have on its contribution to Green Belt purposes.
- 2.1.33. The assessment also does not separately or distinctly consider the Mountpark element of the Ryton West omission site. As a result, it does not comprehensively evaluate whether that land would be more or less harmful in relation to the Green Belt purposes.
- 2.1.34. Furthermore, the assessment does not consider how a landscape-led approach to developing the site could reduce potential impacts on the Green Belt purposes, nor how this may influence the identification of the site - or parts of it - as potentially suitable Grey Belt land.

## **2.2. The Strategic Suitability of Land at Ryton West**

- 2.2.1. In recent years, the area to the south of Coventry has experienced very substantial employment development, reinforcing its sub-regional economic role. Prologis Park Ryton accommodates strategic-scale units serving national logistics operators, and Middlemarch Industrial Estate continues to function as a major employment location. Alongside these existing sites, SEGRO Park Coventry has delivered up to 343,741 sqm of B2/B8 floorspace, a significant proportion of which is now built out. In addition, SEGRO Park Whitley benefits from

a resolution to grant permission for further employment floorspace across an 11.7-hectare site, signalling continued investment interest in the locality. The emerging Gigafactory at Coventry Airport will further consolidate this area as one of the principal economic clusters within the West Midlands.

- 2.2.2. In combination, these developments form a strategically significant agglomeration of employment uses. This is not a series of isolated schemes, but a functional economic zone characterised by shared labour markets, interconnected logistics activity, overlapping patterns of SRN usage, and cumulative demand on infrastructure. As such, it must be understood as a coherent industrial and logistics cluster rather than analysed on a site-by-site basis.
- 2.2.3. Recognising the sub-regional scale of this agglomeration is essential to appreciating its economic value and the role it plays in supporting investment and productivity within the wider Coventry and Warwickshire economy. Crucially, the strength of the cluster also creates opportunities for coordinated delivery of strategic infrastructure improvements, including Community Parks and enhanced green infrastructure that benefit surrounding communities. A coordinated, plan-led approach is necessary to ensure that future growth within this cluster supports sustainable development, aligns with the NPPF's emphasis on supporting strong and competitive economies (NPPF 2024, Chapter 6), and avoids incremental development that might otherwise compound environmental or transport constraints.
- 2.2.4. The Ryton West site sits directly between Coventry Airport's employment land to the west and the established Prologis Park Ryton to the east. Its immediate context is therefore defined by large-scale and strategic employment development on both sides. Development at Ryton West would read as a continued, logical extension of the existing commercial corridor. Consequently, any potential harm to wider landscape sensitivities, Green Belt openness, or residential amenity would be inherently limited because the site is effectively enclosed by existing built form and strategic road infrastructure. In visual, functional, and land-use terms, Ryton West represents natural infill within an evolving employment zone, and its development would reinforce, rather than disrupt, the existing pattern of economic activity.
- 2.2.5. New employment development in such an area is therefore crucial to sustaining the economic momentum already established on the Coventry urban fringe. This location provides immediate access to an extensive, skilled labour pool within Coventry and the wider sub-region, alongside proximity to major road corridors that are essential for modern logistics operations. It is one of the few parts of the Borough where new strategic employment floorspace can integrate directly with an existing cluster, benefitting from established supply chains, shared infrastructure, and proven market demand.
- 2.2.6. Locating additional employment development at the Coventry urban edge also represents the most sustainable spatial option. It concentrates growth where travel distances are shortest, where public transport and active travel connections already exist, and where infrastructure capacity can be enhanced in a coordinated manner. In contrast, dispersing employment to

more peripheral rural locations would increase travel by car, weaken the benefits of co-location, and generate greater landscape and countryside impacts.

2.2.7. The Coventry fringe is therefore the logical focus for accommodating the Borough's strategic employment needs. It offers the strongest economic rationale, the greatest market readiness, and the least environmental harm. Delivering further employment floorspace in this location will reinforce an established economic cluster, maximise the return on existing infrastructure investment, and secure long-term resilience for the Coventry and Warwickshire economy.

2.2.8. Ryton West is a highly sustainable and suitable location for employment development. The site meets all of the relevant criteria for employment development:

- the site is within opportunity 'area 7' identified by the WMSESS;
- It responds to and accords with the regional and sub-regional requirements of strategic employment sites as set out by the WMSESS
- It is strategically exceptionally well located with immediate access to the A423 which in turn links with the A45 and A46, connecting with the M6, M69, M40, and M1 beyond
- It is well-related to Coventry for its labour supply and potential for sustainable transport connections;
- It is located within an area with a number of existing successful employment developments;
- It is well-related to the markets in which it would serve.

#### Key Merits of Ryton West

2.2.9. The site continues to represent one of the most suitable and sustainable locations for strategic employment development. A 'Masterplan Approach' document can be found at **Appendix 1**, which demonstrates how development of the site could come forward, for both 'Ryton West' as a whole, and the Mountpark land individually. Key strengths of the site include:

- **Location / Road Accessibility:** The site is exceptionally well located relative to the strategic highway network with access to the A423 which in turn provides access to the A46 to the north and the Coventry conurbation, its markets, labour and associated businesses. It also provides access to the A45 providing connections to Rugby. These routes in turn provide strategic access to the M6, M69, M1 and M40 motorways and therefore exceptional national accessibility.
- **Need:** The site is located within an area where there is proven demand for strategic employment and is well contained by existing commercial development either side. with 'Prologis Park Ryton' to the east, Middlemarch Business Park and Coventry Airport (including the consented Gigafactory) to the north and west, and Coventry and Warwickshire Gateway to the south-west.

- Context: New development in the site's location would not be out of context, it would not extend the built up area of Coventry any further south into open countryside given the extent of built form established by the surrounding developments. Development of the site would, in effect, fill a logical gap in between existing commercial developments to create a more comprehensive employment area.
- Green Belt: Given the context described above, the site as a whole and in particular the northern part of the allocation, does not contribute strongly to the 5 Green Belt purposes. In this regard, it could be defined as Grey Belt land.
- Accessibility to Labour: The location of the site provides the opportunity for sustainable travel connections to and from the surrounding area and its extensive labour pool. This includes excellent bus links and established strategic cycle and pedestrian connections.
- Sustainable access: There are strong opportunities to improve (enhance and extend) existing bus, cycle, and pedestrian connectivity to the site, ensuring genuine sustainable access options for future employees. These improvements can help to reduce congestion on the roads, which delivers environmental benefits, and encourage active and sustainable forms of travel which should be prioritised. Currently, bus services directly serving the site are limited, and this is reflected within the WMSESS opportunity areas junction score. However, given the location of the site, its relationship with Coventry and the agglomeration of existing economic activity, there is an opportunity to establish a high quality, high frequency service.
- Biodiversity and Nature Recovery: The site does not contain any environmental features that would preclude development and provides the opportunity to deliver significant biodiversity gains. The proposal for the combined site is predicated on a positive response to the landscape and the aspiration to deliver significant benefits in terms of biodiversity.
- Landscaping: The combined site presents the opportunity for the creation of 55ha of a publicly accessible country park. This would include large areas dedicated to publicly accessible green space as well as areas for habitat creation and other biodiversity enhancement. The proposed scheme would be set within an extensive landscape framework, with development plots placed within a landscaped setting and planting around the perimeter of the scheme.
- Public access to nature for amenity and health: The proposals include an extensive area of green space to the west of the site and along the River Avon corridor. This green space could link into the community park being delivered as part of the Coventry and Warwickshire Gateway scheme to provide new and enhanced public access to open spaces alongside areas for ecological enhancement and areas dedicated to nature recovery.
- Response to the Climate Emergency: In addition to the incorporation of green infrastructure and the advantages of the site location in terms of labour and market accessibility, the scheme will provide a framework for environmental conscious construction together with renewable energy generation and use.

- Economic Benefits: The scheme will deliver flexible, large-scale plots for strategic B2/B8 facilities essential for a thriving economy. There would be significant direct economic benefits through investment, job creation and gross value added to the economy.

- 2.2.10. Ryton West also stands to benefit from early access to the emerging Coventry Very Light Rail (VLR) network, with one of the earliest phases planned to connect the City Centre with the new Gigafactory at Coventry Airport. This enhances the site's longer-term sustainability and accessibility credentials.
- 2.2.11. Ryton West offers the opportunity to expand on a sub-regionally significant employment and investment zone, further contributing to the agglomeration within the area around Coventry Airport, come forward in an area that would have limited potential harm towards heritage and landscape sensitivities (as highlighted within the SA), and accords with the locational requirements of the WMSESS.
- 2.2.12. Furthermore, similarly to the Frasers' permission, it is assumed that a WHF permission would be dependent on the new A46 junction being delivered. Whilst the DCO for these works has been permitted, there is no guarantee that the scheme will be delivered quickly, enabling the immediate delivery of employment land. As these works will 'unlock' delivery of the WHF and Frasers' sites, two of the emerging major employment sites would be reliant on the delivery of significant infrastructure, over which the schemes have no control and, consequently, timely delivery cannot be guaranteed.
- 2.2.13. Ryton West, however, would require limited off-site highway works, could come forward quickly, and would ensure that at least one of the two largest employment allocations would not rely on the same piece of infrastructure, therefore limiting risk of delays, and offering the ability for the site to come forward sooner, to meet the market need.
- 2.2.14. As set out in Section 2, Mountpark and Prologis' highways consultants consider the SLR assessment technically flawed and therefore not a sound basis for changing the Borough's employment strategy. Their detailed review is appended at **Appendix 2 and 3** of these representations. Appendix 2 contains a detailed Transport review for the Mountpark part of the site, and Appendix 3 for 'Ryton West' as a whole. The SA's scoring of Ryton West with regards to transport must therefore be reconsidered accordingly, and informed by a robust, sufficient assessment.
- 2.2.15. Ryton West, in place of WHF, would result in a larger delivery of new employment floorspace by circa 60,000sqm.
- 2.2.16. Through the Regulation 18 Preferred Options Consultation, the Council have already concluded a need for additional floorspace to be allocated to delivery employment land. At Regulation 19 stage, this position has not been upheld, and the overall planned amount has reduced by 197,774sqm without any explanation.

- 2.2.17. Our Regulation 18 representations set out our position that we considered the amount planned for at that stage to be a minimum to ensure flexibility for needs not anticipated within the Plan, to ensure a strong performing market, for non-delivery, and to account for the Fraser's permission not being available to the market. These points are discussed further in section 2.4 below.
- 2.2.18. Through the Regulation 18 approach, the Council had planned to deliver additional floorspace to meet those requirements, but has since changed their approach, with no reason as to why.
- 2.2.19. The Regulation 18 higher floorspace provision would help meet needs not anticipated within the Plan to offer flexibility (NPPF para 86), and account for non-delivery of anticipated floorspace.

### **2.3. The Case Against the Inclusion of Walsgrave Hill Farm**

- 2.3.1. Land at Walsgrave Hill Farm (WHF) was promoted through the previous Local Plan and not taken forward as an allocation. The Inspector considered the site as an omission, taking into consideration consultation from Natural England, and Historical England, whilst providing their own view.
- 2.3.2. The previous considerations of the site as part of the previous Local Plan remains directly relevant to the current plan-making stage and to the tests of soundness in the NPPF (paragraph 36) - that plans be justified and consistent with national policy.

#### **Strategic Infrastructure**

- 2.3.3. From the 2019 Inspectors Report, they are clear that strategic infrastructure would not be dependant on the delivery of WHF as an allocation, which is summarised below:
- The 2019 Inspector's Report acknowledged the A46 junction is not dependent on the WHF allocation. This has since been confirmed by the Development Consent Order (DCO) granted on 4 February 2026, which confirms that the WHF scheme will be delivered and funded through National Highways' programme, independent of WHF. This eliminates any strategic justification for allocating WHF on the basis of unlocking highway infrastructure.
  - Regarding the blue-light corridor, the earlier Inspector also recorded that the corridor is to be facilitated from the Coventry City allocation west of the A46, and is not dependent on the WHF land east of the A46.
- 2.3.4. On this basis, the strategic infrastructure case for WHF is not a justified reason for inclusion in the plan.

#### **Landscape and Green Belt Harm**

- 2.3.5. Paragraph 72 of the Inspectors Report states the following in relation to Walsgrave Hill Farm:

*“The A46 on the east side of the city represents a strong, clearly defined boundary. The sites promoted on the edge of Coventry, including WHF, would breach this boundary extending Coventry into the countryside on the eastern side of the A46, causing significant harm to the purposes of the Green Belt in this location in checking the unrestricted sprawl of Coventry and safeguarding the countryside from encroachment.”*

2.3.6. The Inspector’s position remains true, on the basis that the site’s immediate context has not significantly changed, and therefore the Green Belt position is unaffected, and it remains that WHF would cause *“significant harm to the purposes of the Green Belt”*.

2.3.7. In relation to landscape sensitivities for WHF, paragraph 346 of the Inspector’s report explains the following:

*“the Urban Edge Focus could involve significant development in the open countryside on the edge of Coventry and elsewhere, which would be more harmful to the landscape (objective SA17) than previously judged and less positive for regeneration (SA8), resources (SA9) and waste (SA10) than Option 4 which involves a greater urban focus.”*

2.3.8. It is therefore clear that the development of WHF would result in harm to the landscape.

2.3.9. The Addendum for Strategic Site Options: Post-mitigation assessments, December 2025 (paragraph 4.2) paper, for WHF, states the following after mitigation measures are applied (our emphasis in bold):

*“**the development still has potential to increase the imposing warehousing and employment development in proximity to the Registered Park and Garden, as well as listed buildings within the Coombe Abbey Conservation area.** The extension to the country park is likely to have ecological benefits for the adjacent deciduous woodland priority habitat.”*

2.3.10. After mitigation, it is considered by the report that the site would have medium/low impacts on landscape sensitivities. But, it is clear from the text that imposing warehouses would have impacts towards the registered park and garden, including the Heritage Assets they contain. Indeed, the national significance of these assets and any potential harm to them is of critical importance in determining the acceptability of the proposed WHF allocation.

2.3.11. The Inspector also identified that an urban edge focus in this location would be more harmful to the landscape than alternatives. This remains the case and weighs against inclusion when applying the NPPF’s requirement to plan for well-designed places and protect and enhance the natural environment.

2.3.12. Accordingly, WHF fails the NPPF requirement that the plan be consistent with national policy on Green Belt and landscape, and justified, when reasonable alternatives with less harm exist.

## Harm to Heritage Assets

2.3.13. With regards to heritage assets, paragraph 73 of the Inspectors report sets out the following:

*“With particular regard to the WHF site, the Council explained its reasons for not selecting this site when considered against the non-Green Belt alternatives. In addition to the harm to the Green Belt, this includes the potential for harm to Coombe Park, a Grade 2\* registered park and garden, which provides the setting for Coombe Abbey, a Grade 1 listed building, on the southern edge of the site, and to Coombe Pools Site of Special Scientific Interest (SSSI) located within the park. These impacts on nationally important heritage assets and wildlife habitats also weigh heavily against the WHF site in assessing the case for exceptional circumstances.”*

2.3.14. The Inspectors’ position is clear that the impacts of WHF on nationally important heritage assets and wildlife habitats weight heavily against the site in assessing the case for exceptional circumstances.

2.3.15. Whilst it is understood that the emerging proposals for the site have become more ‘landscape-led’ since 2019, the development of the site is still within close proximity to a number of nationally significant assets, and it is clear from the Council’s evidence that concerns remain of significant potential heritage impacts. The December 2025 Heritage assessment states the following (page 131, our emphasis in bold):

*“As a minimum, a more detailed heritage, landscape and visual assessment should be provided, with a proportionate suite of supporting evidence (ZTVs, verified views etc.), prior to any decision making as to the developable area. **This is on account of the high significance of the heritage assets affected, and high potential for impacts.**”*

2.3.16. Historic England’s response to the Regulation 18 consultation for the current Rugby Local Plan, in relation to WHF, states the following:

*“it appears no evidence has been gathered to demonstrate how an understanding of the proposed allocation site contributes to the significance of these heritage assets has informed the principle of development, nor without prejudice, the capacity and necessary design response.”*

And

*“If this site is to be included in the Plan, the local authority would need to demonstrate how it has addressed national planning policy for the historic environment; how the significance of all the effected assets has been understood; how the site contributes to that significance and the subsequent degree of harm, and intended response.”*

2.3.17. We are unaware that any such evidence has been prepared in support of the Regulation 19 version of the plan, that demonstrates how, in proposing to allocate the site the Council has

appropriately considered and, based on robust evidence, addressed its harm towards the significant heritage assets, and the significance of its harm to them.

2.3.18. The position of Natural England, therefore, is likely to remain as per their 2016 representations.

#### **Adverse Effects on Coombe Pools Site of Special Scientific Interest (SSSI)**

2.3.19. As per the quote above from paragraph 73 of the Inspectors' report, amongst harm towards other nationally significant heritage assets within the vicinity of WHF, development of the site would also have adverse effects on Coombe Pools SSSI.

2.3.20. Natural England's response to the Regulation 18 consultation for the current Rugby Local Plan, in relation to WHF, states the following:

*“Combe Pools SSSI is directly adjacent to this proposed site. This SSSI is notified for breeding birds and as a Country Park has managed access. The Sustainability Appraisal in support of this iteration of the plan acknowledges potential adverse effects from development in close proximity to designated sites (4.83). Natural England advises that further detail specific to this site is required in the Appraisal for the consideration of this proposed allocation in line with this statement”*

2.3.21. We are unaware that any such appraisal or evidence has been prepared in support of the Regulation 19 version of the plan, that demonstrates how to further site specific details have been prepared in order to understand the potential adverse effects ahead of the proposed allocation's consideration.

## **2.4. Employment Land Need**

2.4.1. Further to Section 2.2 above, the December 2024 National Planning Policy Framework (NPPF) is clear about the importance of the planning system in supporting the economy and meeting the specific requirements and needs of key sectors of the economy, including through providing suitable employment land. Paragraph 85 states that:

*‘Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.’*

and

*‘Significant weight should be placed on the need to support economic growth and productivity taking into account local business needs and wider opportunities for development.’*

2.4.2. The Council's December 2025 Development Needs Topic Paper identifies c.1,034,000 sqm of B2/B8/E(g)(ii)/(iii) floorspace, compared with an evidenced need (which we do not accept) of 1,024,125 sqm, whereas the Regulation 18 strategy would have delivered c.1,231,987 sqm. This constitutes a significant overall reduction of circa. 200,000 sqm. Mountpark supported

the Regulation 18 quantum as a minimum to maintain resilience and flexibility in the supply. The significant reduction at Regulation 19 has not been justified by proportionate or up-to-date evidence, contrary to NPPF plan-making requirements.

- 2.4.3. Under the new approach, the Council proposes to provide only around 10,000 sqm above the requirement it has identified, notwithstanding that this identified requirement is not accepted. We do not support this strategy, as it fails to reflect key National policy requirements, as discussed further below, whilst offering no assurance that any of the identified land will meet Coventry's unmet local employment needs on appropriately located employment sites, should that be the strategy pursued.
- 2.4.4. To ensure clarity in the Local Plan, we consider that the employment land needs should be specified within relevant policy.

#### Plan Period

- 2.4.5. It is noted that the Plan period is from 2025 – 2042. If the Council's Examination timescales are met, of which there is no certainty, and the Plan is submitted by the end of 2026, given the likely timescales for the Examination process, it is reasonable to consider that the Plan might be adopted in 2028.
- 2.4.6. Plans must cover a minimum period of 15 years from adoption. As such, the plan should extend to 2043.
- 2.4.7. Employment land needs should be increased accordingly to be reflective of the extended Plan period. On a prorated basis, the identified need should increase by circa 6ha. This is based on the Council's prorated change from the assessed needs up to 2045, being reduced by 17.5ha to reduce the plan period by 3 years to 2042, as set out within the 'Development Needs Topic Paper', December 2025.
- 2.4.8. At a 0.35 plot ratio (as used by the WMSESS), this would be an additional 2,100sqm floorspace.

#### Gateway South Supply Error

- 2.4.9. The 'Coventry and Warwickshire Employment Needs, addendum to the Coventry and Warwickshire Alignment Paper', November 2025, is clear in that employment supply was over-counted by 90ha due to an error where the 'Community Park' element of the Coventry Gateway Site was considered as developable land.
- 2.4.10. The paper therefore identifies that supply is reduced by 90ha. The Coventry Gateway site falls within 'Opportunity Area 7'.
- 2.4.11. The Rugby 'Development Needs Topic Paper', December 2025, sets out that an additional 50ha of land is required to be delivered, to account for this error. From Regulation 18 to 19 stage, the residual requirement is broadly similar, and this is understood to be due to the Symmetry Park site being completed by Regulation 19 stage.

- 2.4.12. The Alignment Addendum Paper considers it reasonable to allocate only 50ha of the 90ha over-supply error to be delivered within 'Area 7'. We do not consider this approach appropriate, nor sound. This is on the basis that Coventry Gateway is within opportunity 'Area 7', and its supply was considered to contribute to needs in that area when the 2024 WMSESS was prepared. As such, the 90ha error, must therefore be delivered in its entirety within 'Area 7'.
- 2.4.13. Furthermore, whilst the Addendum suggests that it is reasonable to deliver only an additional 50ha in 'Area 7', it then does not suggest where that additional 40ha should be delivered. Therefore, a 40ha shortfall exists that is not proposed to be allocated within an opportunity area.
- 2.4.14. Accordingly, we consider that Rugby's identified residual needs must increase by 40ha to ensure that the supply error is delivered in full, in the opportunity area that it derived from originally.
- 2.4.15. Based on a 0.35 plot ratio, the residual need, must increase by 140,000sqm.

#### Supressed Demand

- 2.4.16. A potential shortcoming of the Councils' evidence base within the HEDNA (2022) and WMSESS (2024) is that they do not account for historic suppressed demand. A limited availability of land and buildings has a consequential effect of suppressing demand, as occupiers cannot find space. Completions data (set out in the evidence base) only represents actual delivery over time and does not factor in losses to the local economy, where occupiers have had to go outside of the study area or have not been able to expand due to lack of availability. The British Property Federation's (BPF's) 'Levelling Up – The Logic of Logistics Report' identifies a market equilibrium level, where supply and demand are broadly balanced and rents are more stable, of around 8%. The HEDNA acknowledges that the supply of available industrial space remains low and has been at low levels for some time.
- 2.4.17. The implication is that the need figures delivered through the various studies is likely to have downplayed the levels of actual market need.

#### The Frasers Permission

- 2.4.18. The Frasers permission, and consequently the subsequent allocation, is conditional to a specific occupier (Frasers Group plc) and allows the company to expand and relocate from premises in Derby. Given this, it does not help to meet the floorspace requirements of the wider market through the expansion of local businesses or inward investment. This restriction should be recognised in assessing the suitability of the Local Plan's approach to meeting employment land needs and it provides further justification for the Plan to revert to the Regulation 18 Preferred Options position, which we proposed should be the minimum requirement.
- 2.4.19. The December 2025 RBC Development Needs Topic Paper seeks to address this matter at paragraph 3.49, but the response is superficial and fails to grapple with the key issue raised by multiple representors – namely, that the Frasers permission is *not* an open-market

development. If employment land requirements are to be informed by market signals, as required by the NPPF, then a scheme that is not available to the general market cannot reasonably be treated as exerting any meaningful downward pressure on those indicators. The Topic Paper does not acknowledge this fundamental distinction, nor does it engage with the implications it has for interpreting market demand.

- 2.4.20. Paragraph 3.52 makes only a limited attempt to explain the nature of the permission. While it asserts that the development is not occupier-specific, it simultaneously confirms that its use is restricted through planning conditions to the Frasers Group and its subsidiary companies. This is, by definition, not an open-market scenario. The Topic Paper overlooks the clear contradiction and fails to recognise that such restrictions confine the scheme to a narrow element of a specific market segment. As a result, the permission cannot be treated as general-purpose employment floorspace that is available to meet wider need.

#### Flexibility to Meet Needs Not Anticipated

- 2.4.21. Beyond the need quantified in the employment evidence base, national policy requires plans to provide sufficient flexibility to respond to needs that were not anticipated at the plan-making stage. This requirement is not convincingly addressed within the current evidence base. NPPF paragraph 86, part e) makes this explicit, stating that plans must:

*“e) be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.”*

- 2.4.22. Under the Council’s new approach, which proposes delivering substantially less employment land at Regulation 19 stage (circa 200,000sqm), there is no meaningful allowance for needs that may emerge outside those already identified. Mountpark’s position, as set out in our Regulation 18 representations, remains that the quantum of employment land identified at Regulation 18 should represent the minimum level of provision within the plan.
- 2.4.23. Recent growth in online retailing has driven a marked increase in demand for distribution and logistics floorspace located close to major population centres. This shift could not have been anticipated to its full extent and demonstrates how rapidly economic patterns can evolve. Meeting this form of demand requires a supply of new employment land that keeps pace not only with population growth, but with structural changes in consumer behaviour. It is therefore essential that the plan delivers sufficient new employment floorspace in appropriate and sustainable locations. Looking ahead, the plan must retain adequate flexibility within its employment land supply to respond to further unforeseen economic shifts. Additional capacity is critical to ensuring the Borough can adapt quickly and maintain resilience to future market changes.

### Non-Delivery

- 2.4.24. As is the case with housing land supply, the Plan should recognise that some employment land may remain, for whatever reason, undeveloped during the Plan Period. In order to account for this possibility, the Plan should include enough flexibility in allocating land to ensure that the minimum amount planned for at Regulation 18 stage is met in full. Mountpark are of the view, as set out in our Regulation 18 representations, that the amount planned for at Regulation 18 stage, should be the minimum amount planned for, to also account for non-delivery of sites.
- 2.4.25. A current example of non-delivery is the Coventry City allocation ‘Land at Baginton Fields’, Policy JE2.4 of their Regulation 19 draft Local Plan. This site is allocated for 25ha of strategic employment land within Coventry City, and is considered as such, as supply within the WMSESS.
- 2.4.26. This site was allocated within the 2017 Coventry City Local Plan and is yet to come forward. It is heavily constrained by existing uses such as a school, and it contains a large woodland and a designated nature reserve. The deliverability of this site is therefore highly in doubt. As such, there is great uncertainty as to whether that 25ha (87,500sqm at a 0.35 plot ratio) will come forward.

### Employment Land Strategy

- 2.4.27. Should the WHF allocation remain the preferred strategy, in combination with the wider employment strategy, it would not provide sufficient floorspace in order to respond to the points raised above. Therefore, it is Mountpark’s view that Ryton West should be reinstated as an allocation in place of WHF.
- 2.4.28. Mountpark are of the view, as set out in our Regulation 18 representations, that the amount planned for at Regulation 18 stage, should be the minimum amount planned for, to also account for non-delivery of sites.

### Conclusions on Employment Land Needs

- Extended Plan Period
  - The Plan should extend to **2043**, requiring needs to be uplifted accordingly.
  - This results in an additional requirement of **circa 2,100 sqm** of employment floorspace.
- Correction of Supply Counting Error (Coventry Gateway)
  - The 90ha over-counting error at Coventry Gateway must be rectified in full within Opportunity Area 7.
  - This increases Rugby’s residual requirement by circa 40ha, equating to 140,000 sqm of additional floorspace (based on a 0.35 plot ratio).

- Adjustment for Non-Delivery of Sites
  - The Plan must make provision for potential non-delivery, consistent with national policy expectations for flexibility.
  - The Coventry Baginton Fields allocation (25ha) remains undelivered and is significantly constrained, placing its delivery in doubt.
  - To ensure needs can be met in full, an allowance for 87,500 sqm at a minimum, should be added to account for this risk.
- Total Additional Requirement
  - Combined, these matters generate an uplift of circa 229,600 sqm of additional employment floorspace.
- This figure does not include any further allowance for:
  - flexibility to meet needs not anticipated during plan-making, or
  - compensating for the Fraser’s site, which cannot meet general open-market need due to occupier restrictions.

2.4.29. Rugby have significantly reduced their overall employment land provision from **1,231,987 sqm** at Regulation 18 (Preferred Options) stage to **1,034,243 sqm** at Regulation 19 stage. This represents a reduction of **197,744 sqm**, leaving almost no flexibility beyond the Council’s stated requirement of **1,024,125 sqm** (which we do not accept). As set out above, this scale of reduction is not justified and materially undermines the robustness of the plan.

2.4.30. In our Regulation 18 representations, we were clear that the floorspace planned for by proposed allocations should be treated as the minimum amount to be planned for, given the evidence around market need, supply constraints, and the requirement for flexibility.

2.4.31. Based on the calculations set out in paragraphs 2.4.29 to 2.4.32, Rugby must allocate a **minimum of 229,600 sqm of additional employment floorspace** to address:

- the extended Plan period
- correction of the 90ha Coventry Gateway supply error
- the need to plan for non-delivery, including the undeliverable Baginton Fields allocation

2.4.32. This uplift alone exceeds the Council’s current Regulation 19 provision and reinforces our position that the Regulation 18 quantum – which incorporated approximately 200,000 sqm more floorspace – must represent the minimum level of provision in the Local Plan. In practice, the additional need identified (229,600 sqm) indicates that the Council should, in fact, plan for a higher overall supply than was suggested by Mountpark at Regulation 18 stage, to reflect the errors and calculations now identified.

2.4.33. For clarity, the employment land needs should be specified in policy. Mountpark supports Objective 1 to grow the economy and the broad direction of policies S3 and S7. Consistent with the NPPF's economy chapter, planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt, and significant weight should be given to supporting economic growth and productivity, taking account of local business needs and wider opportunities. The plan should therefore treat the identified employment land requirement as a minimum, not a ceiling. In light of this objective, the significant reduction in employment land provision since Regulation 18 stage, has not been justified.

## **2.5. The Mountpark Ryton Site**

2.5.1. Whilst the 'Ryton West' omission site was for the entirety of the area, including Mountpark and Prologis land, at no point have the Council considered the potential to deliver the Mountpark part of the site in isolation.

2.5.2. If it is decided that Ryton West as a whole is to not be allocated, then the Mountpark Land within the wider Ryton West site, should be proposed for allocation to meet the requirements, and employment needs, as set out in section 2.4 above. On the basis that it would deliver additional employment land supply, with minimal off-site highways works required, enabling a contribution towards supply much sooner, and offer additional land to meet needs not anticipated in the plan period, and for non-delivery.

2.5.3. In doing so would enable employment land to come forward sooner within the plan period, that would not be reliant on the delivery of significant off-site infrastructure works, therefore increasing supply at an early stage in the Local Plan period and offering an earlier contribution to the market supply.

2.5.4. The Mountpark element of Ryton West not only shares all the advantages of the wider omission site, but represents the most logical and defensible development parcel within it. This site is the best related parcel to the urban area from the wider Ryton West land, and constitutes a genuine infill opportunity between existing commercial uses. As a result, it is the part of the wider area that would clearly have the least effect on the countryside and Green Belt, performing particularly weakly against Green Belt purposes when assessed in isolation.

2.5.5. The parcel benefits from excellent strategic highway access and sits within a well-established cluster of major employment uses, making it a coherent and natural extension to the employment landscape. It would also integrate effectively with the new Community Park being delivered at SEGRO Park Coventry, providing a well-connected and complementary land use pattern. The site offers strong potential for biodiversity enhancement and substantial green infrastructure delivery, further reducing any perceived environmental effects.

2.5.6. Crucially, the Mountpark parcel is immediately deliverable and capable of meeting identified employment needs in the short term, in line with national policy requirements to plan positively for objectively assessed needs. Its allocation would secure clear public benefits and materially strengthen the flexibility and resilience of the Borough's employment land supply.

2.5.7. Further to section 2.1 of this document, if the Mountpark element of the Ryton West omission site were to be delivered, it is the view of Mountpark’s highways consultant that there would be no material impacts at Toll Bar Island.

2.5.8. The findings of the Lawrence Walker Technical Note (TN1) demonstrate that the Council’s evidence base which was the sole reason for the removal of Ryton West, particularly for the Mountpark land, at Regulation 19 stage, is fundamentally flawed. The key points are summarised below:

- The Mountpark land was never assessed in isolation – SLR repeatedly tested only the combined Mountpark + Prologis scheme. The Mountpark site acting alone was never modelled or considered by SLR or the Council, despite its significantly lower potential impacts.
- The SLR Report is flawed on the basis that it did not consult National Highways, it assessed the junction using 2016 data which did not account for the significant network improvements in recent years, and it did not assess potential for mitigation opportunities.
- TN1 sets out that the Mountpark only potential impacts on Toll Bar Island are around 2% – based on the TN1 traffic calculations, only around two-thirds of Mountpark trips would even route towards Toll Bar, resulting in a negligible change.
- SLR did not acknowledge the built-in capacity enhancements at Toll Bar that were deliberately safeguarded during the A45 Gateway works. These include:
  - the safeguarded additional westbound lane on the A45
  - the Gateway Demand Management System (DMS)
  - improved lane discipline and minor signal optimisation.
  - All are already designed into the junction and can be implemented with minimal intervention
- Local road impacts are modest and easily mitigated – the only notable local impact is c.30 vehicles eastbound on the A445 during the AM peak (c.5%), which can be comfortably mitigated by minor widening within the existing highway boundary

2.5.9. On this basis, there is no credible technical reason for the Mountpark site to have been removed from the Regulation 19 strategy on highway grounds. The impact of Mountpark alone is minor, mitigatable and any necessary highways works are demonstrably deliverable. The Council’s removal of the allocation, without assessing the site independently and without testing the quick-win mitigation measures, is not justified or sound.

### 3. Summary and Conclusions

#### 3.1. Summary

- 3.1.1. These representations demonstrate that the Regulation 19 Submission Draft is not supported by a proportionate, robust or up-to-date evidence base and is therefore unsound. The omission of Ryton West – and the substitution of Walsgrave Hill Farm – is not justified when assessed against the Council’s own Sustainability Appraisal, national policy requirements, and previously established evidence from the Local Plan Examination. The Strategic Transport Assessment is based on outdated modelling and cannot reasonably be relied upon to justify this major strategic change. By contrast, Ryton West - and the Mountpark element in particular - represents a highly sustainable, deliverable and policy-compliant location for employment growth, with significantly fewer environmental and heritage constraints when compared with WHF, and with the ability to meet urgent market needs earlier in the plan period.
- 3.1.2. Reinstating Ryton West, or at minimum allocating the Mountpark parcel, would make positive steps towards aligning the Plan with national policy, provide essential flexibility in employment land supply, and ensure the Borough can support economic growth in a suitable way.

#### 3.2. Conclusions

- 3.2.1. We recommend that Rugby Borough Council:
- **Reinstate Ryton West as an allocation** in the Employment Strategy, replacing Walsgrave Hill Farm, on the basis that it clearly performs better in the Sustainability Appraisal when highways evidence is corrected.
  - **Allocate the Mountpark parcel independently**, even if the wider Ryton West site is not reinstated, to provide early, deliverable supply that is not dependent on major off-site infrastructure and can meet immediate market demand. The Mountpark element of the Ryton West Site would deliver circa 72,000sqm, which would bridge the gap of 60,000sqm lost through the Ryton West allocation being replaced by WHF.
  - **Withdraw Walsgrave Hill Farm as an allocation** due to unresolved and significant Green Belt, landscape, heritage and SSSI impacts, as concluded by the Inspector in 2019, and the absence of any clear and convincing evidence capable of justifying development in this sensitive location.
  - **Prepare a new, robust, up-to-date transport assessment**, reflecting the post-Covid network, major SRN upgrades (including the Binley improvements and Gateway Interchanges), and local improvements to improve capacity, before making any sound planning judgements on strategic allocations.
  - **Increase the employment land supply**, reinstating the higher quantum of employment floorspace to provide resilience, meet suppressed demand, and ensure flexibility for needs not anticipated within the Plan (as required by NPPF paragraph 86).

- **Ensure the Sustainability Appraisal is legally compliant**, revisiting the comparison of reasonable alternatives with a corrected transport evidence base and a complete heritage and ecology evidence base for WHF.

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# **Appendix 1 – Ryton West and Mountpark Ryton Masterplan Approach Document**

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# Mountpark Ryton

Masterplan Approach Document

March 2026



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■ Introduction

# Introduction

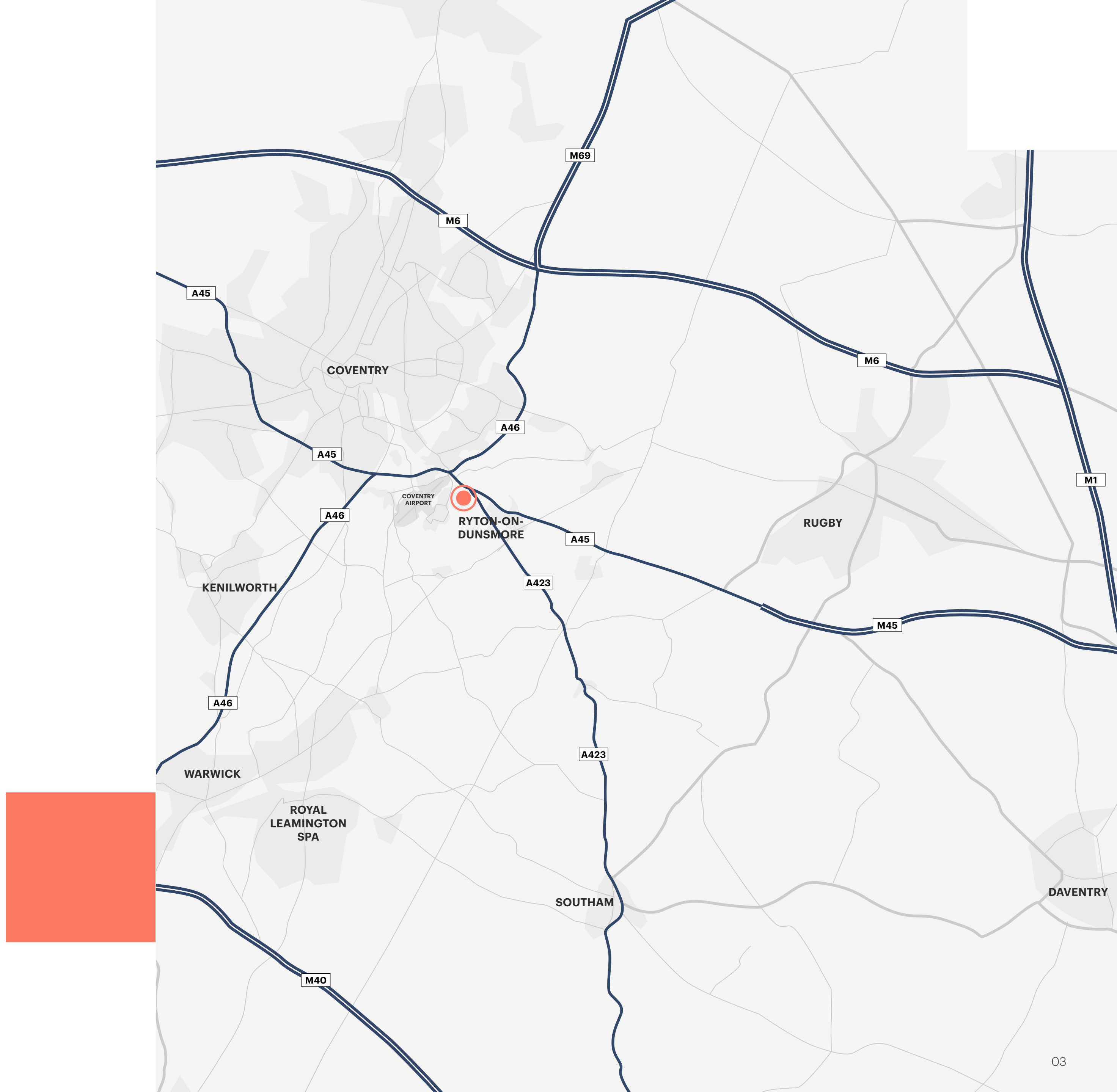
This document sets out a vision for employment development at Mountpark Ryton, a site that is being promoted through the Rugby Local Plan process.

Mountpark Ryton has the ability to deliver a world class employment development with an emphasis on health and well-being, sustainable travel, landscape, Biodiversity Net Gain and carbon and energy reduction.

Whilst forming its own discrete site, Mountpark Ryton also forms part of a wider site which incorporates Prologis' land to the south, known as Prologis Park West. Mountpark are working with Prologis to ensure a coordinated and comprehensive approach to delivering the sites.

In combination, Mountpark Ryton and Prologis Park West could deliver significant economic, social, and environmental advantages. The delivery of high quality employment facilities would build upon the success of existing commercial development in the area, whilst remaining accessible to a strong labour pool. Environmental benefits will be realised through the creation of an extensive new circa 55ha Country Park.

Independently, Mountpark Ryton has the same locational advantages as the combined scheme and would similarly offer economic, social and environmental benefits.



■ Why?

# Employment Land Need

The Local Plan evidence base comprises the West Midlands Strategic Employment Sites Study (WMSESS, 2023) along with the Coventry and Warwickshire HEDNA (2022), both of which have informed the proposed employment land requirements across the Plan Period.

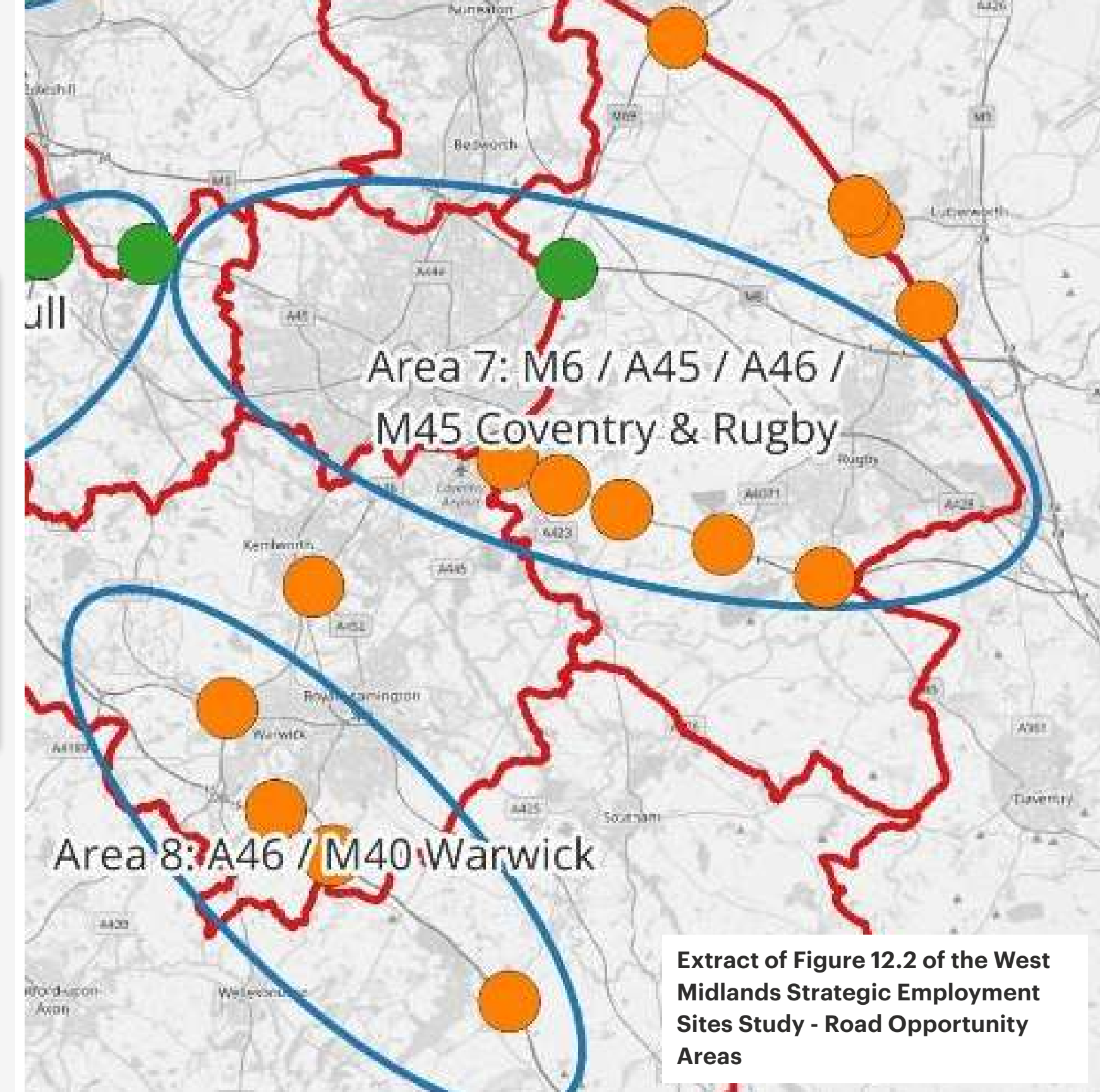
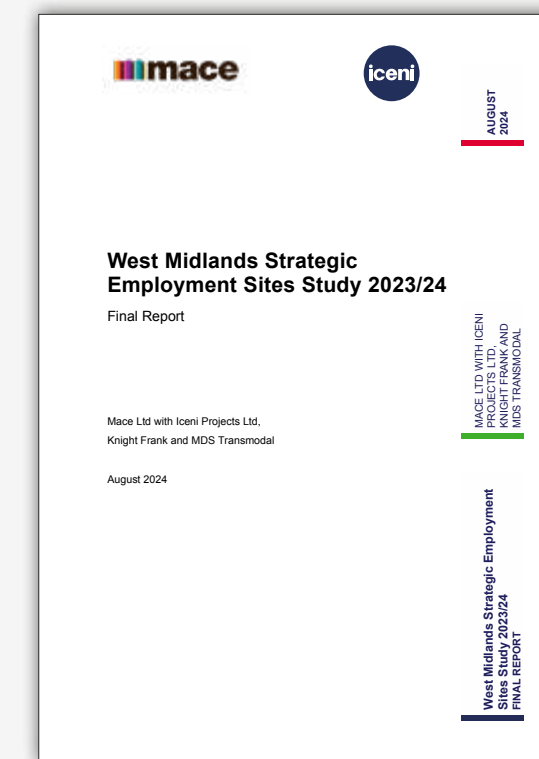
The WMSESS assesses employment need across the wider West Midlands area and recognises that strategic employment requirements relate more so to market areas rather than Local Authority boundaries. Market areas are generally influenced by large urban areas as well as the Strategic Road Network.

In Warwickshire, the largest of the urban areas is Coventry, which is only a short distance from Mountpark Ryton.

The plan shown here is an extract of figure 12.2 of the WMSESS, and defines the new road-based opportunity areas for new strategic employment sites to come forward. Mountpark Ryton is included within Road Opportunity Area 7 of the WMSESS.

The site meets all of the relevant criteria for employment development, which is summarised as follows:

- The site is within 'Opportunity Area 7' identified by the WMSESS;
- It responds to and accords with the regional and sub-regional requirements of strategic employment sites as set out by the WMSESS;
- It is exceptionally well located with immediate access to the A423 which in turn links with the A45 and A46, connecting with the M6, M69, M40, and M1 beyond;
- It is well-related to Coventry providing a strong labour pool and excellent potential for sustainable transport connections. ;
- It is located within an area with a number of existing successful employment developments;
- It is well-related to the markets in which it would serve.



Extract of Figure 12.2 of the West Midlands Strategic Employment Sites Study - Road Opportunity Areas



■ Where?

# Site Location

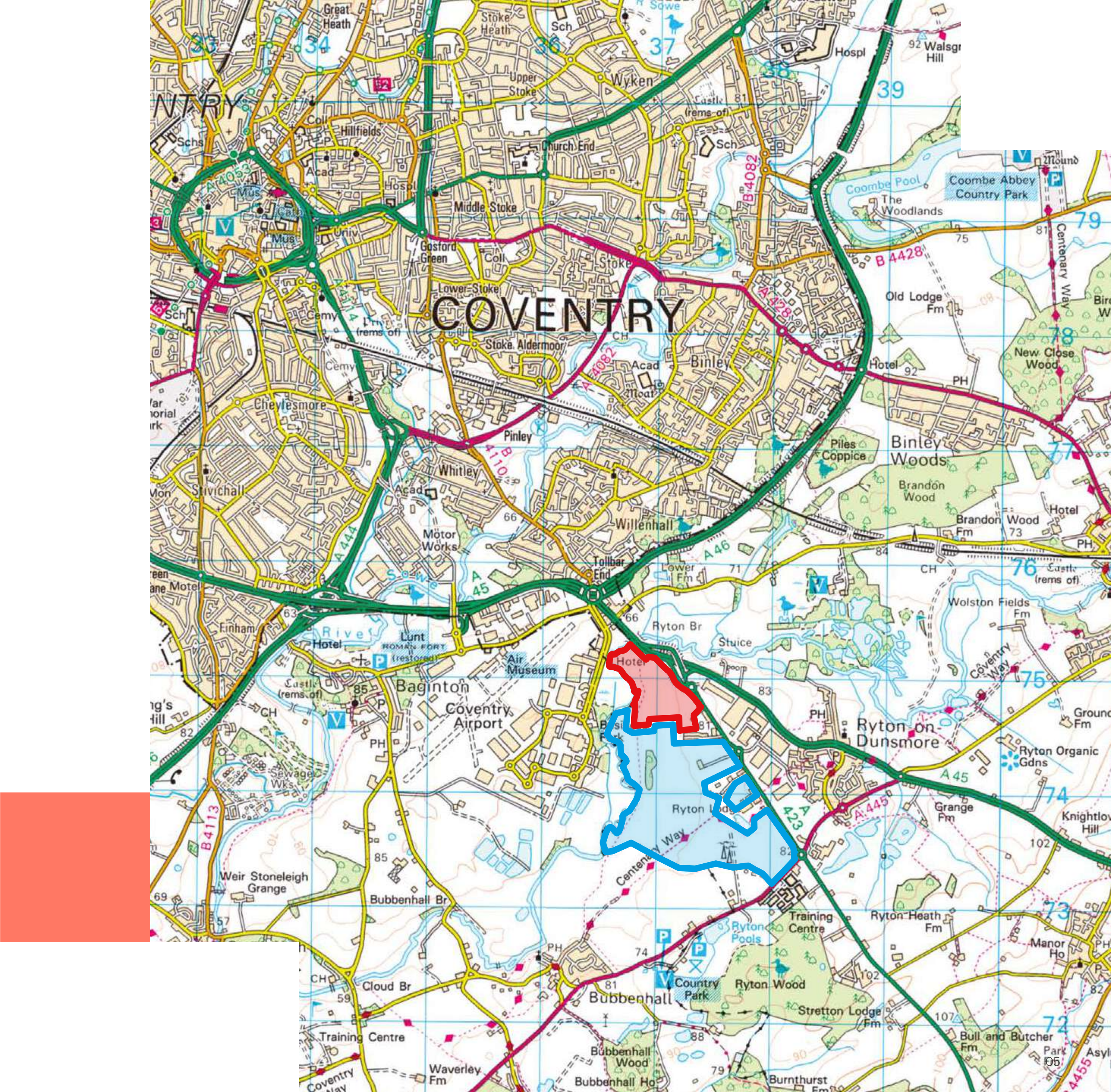
Mountpark Ryton is extremely well located, allowing it to meet the criteria for the identification of strategic employment land.

The site occupies an urban edge location on the western boundary of Rugby Borough south-east of Coventry. The site is extremely well situated to the Strategic Road Network via the A45 eastbound to the M45, M1 and the Coventry Eastern Bypass, connecting to the the M6 and M69 beyond. The site's proximity to Coventry City and wider urban areas, including Rugby Town provides access to a strong labour supply.

In terms of employment catchments, the site is ideally placed with around 625,000 residents living within approximately 10km of it. These include Coventry (375,000), Rugby (125,000), Leamington Spa (50,000), Warwick (35,000) and Kenilworth (25,000) and would meet market needs across this part of Warwickshire.

Whilst the site is located within Rugby Borough Council for administrative purposes, given its positioning, the site clearly has a direct relationship with Coventry, and would meet market needs across this part of Warwickshire.

The proximity to Coventry also offers opportunities to develop high quality, high frequency public transport connections as well as new pedestrian cycle routes.



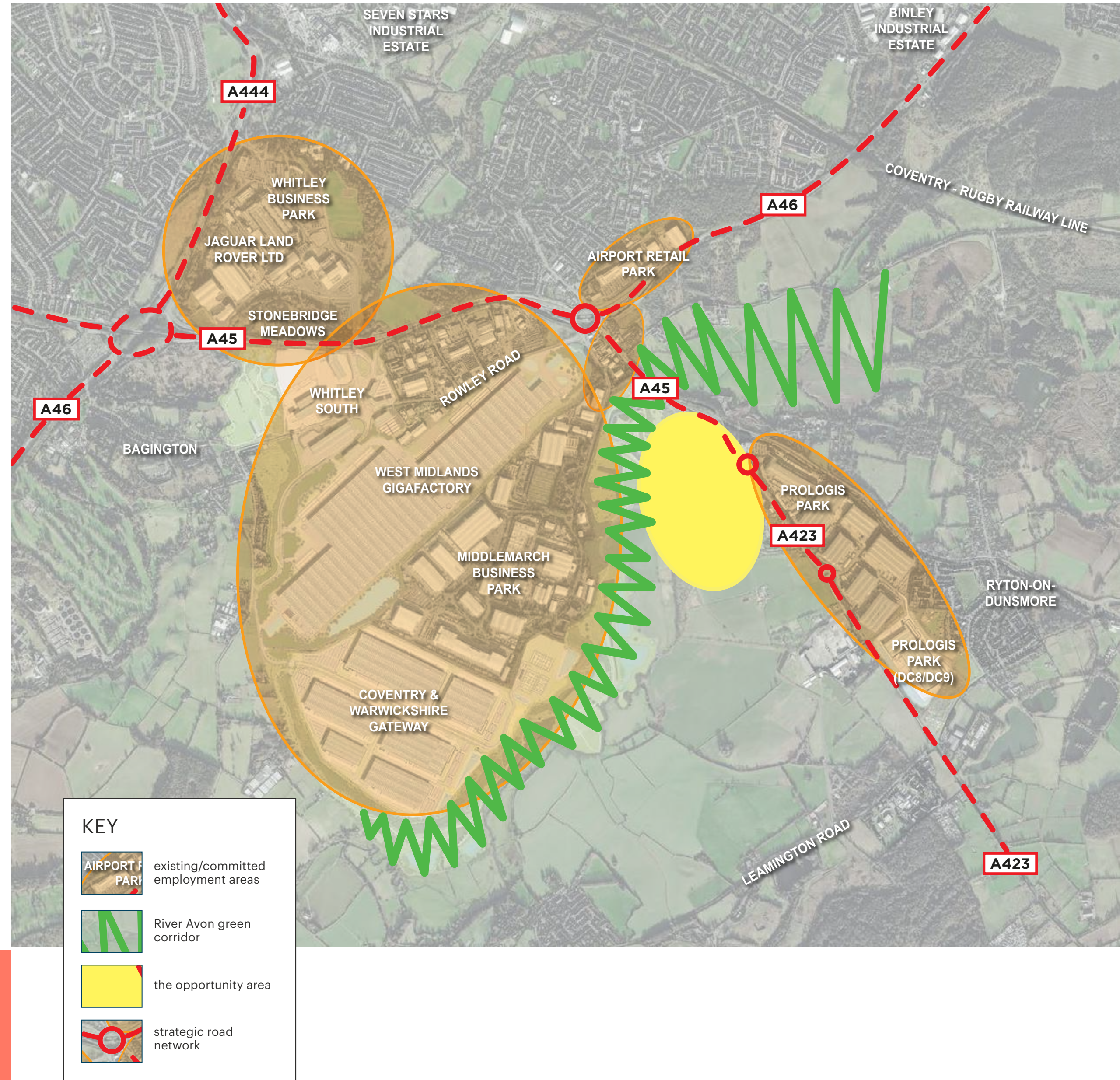
■ Where?

# Site Context

The site is located within an established commercial area, where there is proven demand for strategic employment floorspace as demonstrated by the Local Plan evidence base and take up of space at neighbouring developments. Neighbouring developments include JLR's Whitley plant, Middlemarch Industrial Park, the Coventry Gateway development, the airport (with its consent for a Gigafactory) and Prologis Park Ryton to the east. This high level of economic activity is testament to the attractiveness of the location for economic investment.

In this context, the site provides the next logical step to expanding on the business clusters in this area, contributing to this agglomeration, and in-turn making the area a regionally significant employment cluster.

New commercial development in this location would not be out of context, and it would not extend built development further south into open countryside given the extent of surrounding built development. The site occupies an obvious 'gap' for future growth between existing commercial developments.



■ What?

# Mountpark Ryton

Mountpark Ryton is well contained by existing commercial development at Prologis Park Ryton to the east and Coventry and Warwickshire Gateway, Middlemarch Business Park and Coventry Airport to the west. Uniquely, the site has the ability to make a meaningful contribution to publicly accessible green space, through the delivery of a Country Park. The approach to development will mirror that to the west of the River Avon, with an extensive Country Park along the entire western edge of the site. The initial Concept Plan shown on this page demonstrates how the site could be integrated within this context.

The masterplan on this page represents an initial concept plan for what can be accommodated and delivered on the site. The intention is to engage with Rugby Borough Council and other stakeholders and for the scheme to evolve through positive engagement. The site is however capable of delivering:



Approximately 72,000sqm of high-quality employment floorspace



Benefits from excellent access to the strategic road network, with direct access onto the A423, in turn linking with the A45 and A46, which links directly to the M40 and M6



Creation of an area of a significant 55ha Country Park, offering connectivity and expansion to the existing park to the west



Delivery of significant Biodiversity Net Gain benefits



Connections to existing high quality footpaths and cycleways and creation of new cycle and pedestrian links to nearby settlements, together with access to established public transport services.



Striving to reduce embodied carbon in construction, together with on-site renewable energy generation through roof mounted solar panels



■ What?

# The Combined Site: Ryton West

Whilst the Mountpark Ryton site is capable of coming forward on its own, Mountpark continues to work collaboratively with Prologis to ensure that the promotion of and proposals for the combined site, known as Ryton West, is coordinated.

The emerging concept for the site seeks to provide the opportunity for large format, world class employment development set within extensive green space with high quality formal landscaping areas for public access, as well as areas for biodiversity enhancement.

The overall scheme can deliver:



Up to 350,000sqm of employment floorspace across the site



A New 55ha Community Park



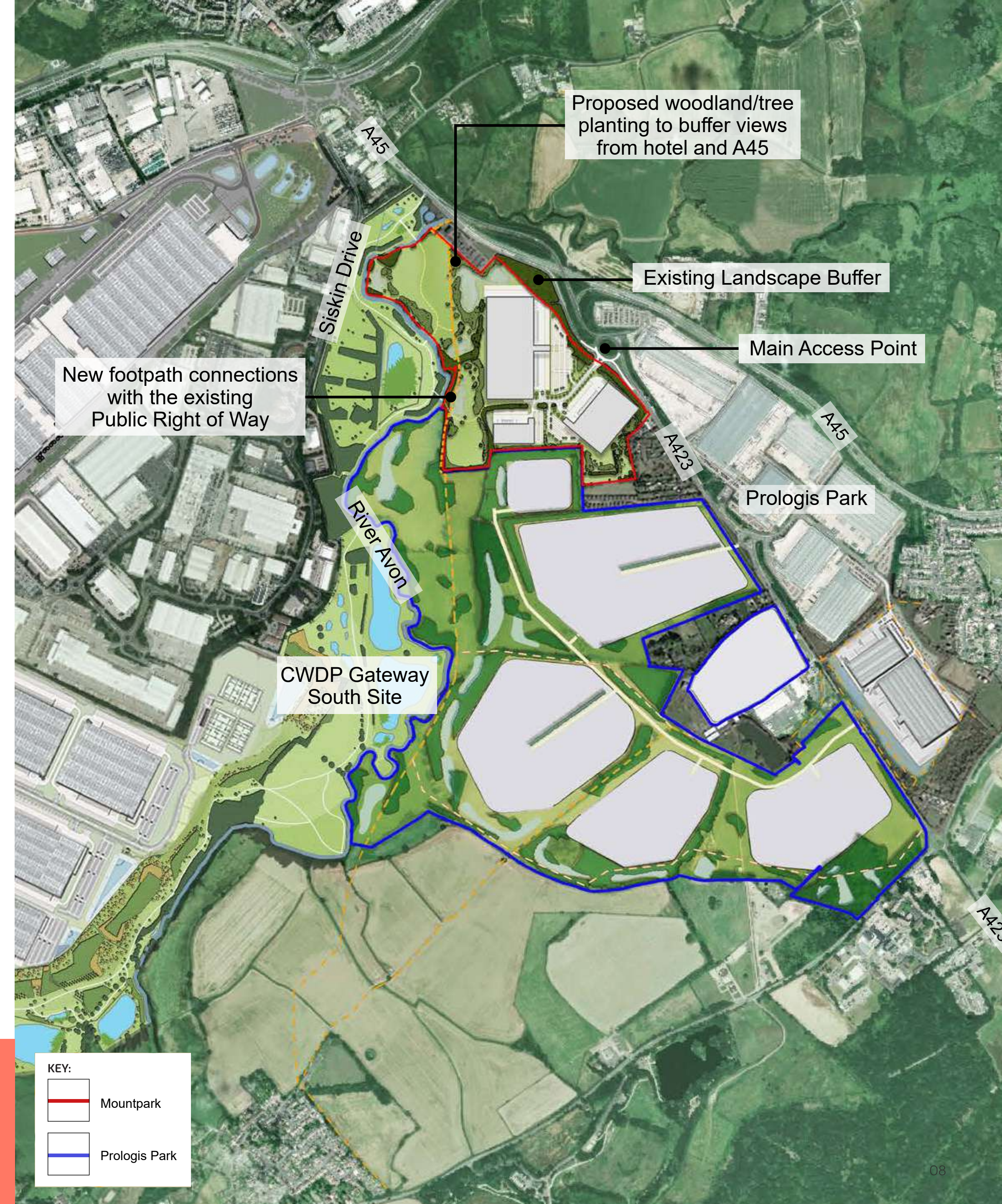
Improved active travel connections





A new over-night lorry park



A logistics employment and training facility



KEY:

	Mountpark
	Prologis Park

■ How?

# Landscape Led

Landscape design is at the forefront of the proposals; in other words, the layout and design of the site is wholly influenced by the landform, the river and associated flood zones, existing planting, and ambitions for biodiversity enhancements and increased public access to nature.

The available land is sufficient to deliver a landscape framework which can both visually screen the development and provide significant areas of ecological enhancement and biodiversity net gains.

The scheme can:



Provide significant biodiversity enhancement with the aim to exceed statutory biodiversity net gain requirements.



Retain and enhance the existing ecological features



Establish a strong landscape framework, providing safe, accessible green infrastructure that protects the amenity of near-by receptors



Ensure the River Avon and associated flood zones will be retained as green infrastructure as part of a proposed Country Park.



Deliver development in a location that is not covered by any landscape protection designations or designated wildlife sites, at either a national or local level



■ How?

# The Country Park

The combined scheme provides the unique opportunity to create a significant new Country Park, which can be linked to and integrated with existing green space to form an expansive network of publicly accessible country park.

The Country Park could link into and integrate with the existing Coventry and Warwickshire Gateway Community Park immediately to the west of the River Avon via a new pedestrian footbridge. Integration between the parks, as well as Ryton Pools to the south would create an expansive network of green spaces and create a destination Country Park.

The resulting joined up Country Park would enable public access to vast areas of both green and blue infrastructure, allowing the public to enjoy scenic riverside walks, wildlife sightseeing, running routes, dog exercise areas, children's play areas and more.



- |   |   |
|---|---|
|  <p>Creation of a new publicly accessible Country Park of c. 55ha comprising new woodland, wetland and grassland areas.</p>                          |  <p>Accessible green space for employees of the development as well as members of the public.</p>                                    |
|  <p>Creation of areas of landscaped open space with varied habitats together with public access paths and tracks.</p>                                |  <p>Creation of new on site footpaths/cycleways and trim trails, encouraging sustainable travel choices and promoting wellbeing.</p> |
|  <p>Habitat creation which will accommodate and encourage a range of flora and fauna.</p>  |  <p>Establishment of 'Wild Spaces' to allow planting and wildlife to flourish undisturbed.</p>                                       |
|  <p>Integration with existing Country parks at Coventry and Warwickshire Gateway and Ryton Pools to create an expansive network of green spaces.</p> |  <p>Delivery of significant Biodiversity Net Gain through habitat improvements and creation.</p>                                     |



■ How?

# Access:

The scheme provides direct access to the strategic road network and is well placed to accommodate a large, strategic employment site.

- An assessment has been undertaken of the capacity of the surrounding highways network and initial discussions have been held with National Highways and Warwickshire County Council Highways. This work shows that the proposal can in principle be satisfactorily accommodated on the network.
- The site itself would take access off the Oxford Road via a new third arm from the Oxford Road/Hillman Way roundabout, which currently provides access to Prologis Park Ryton. The wider site would gain access from new roundabout arms further south along Oxford Road.
- Accesses have been assessed as being safe and suitable, and can build upon the successful HGV routing agreement for Prologis Park Ryton, which would be carried through the new development ensuring that restrictions on HGVs accessing the A45 via the village along Leamington Road would continue.



Mountpark Ryton

# Public Transport and Accessibility

The location of the Ryton site, in particular its relationship to Coventry and the agglomeration of existing economic activity in the area, provides the opportunity to establish excellent sustainable transport links. The site is therefore situated in a highly sustainable location and offers significant opportunity to improve accessibility by foot, bicycle, and bus. There would be a genuine choice of sustainable travel options to access the site. The site represents an opportunity to deliver a genuinely sustainable development in this regard.

A newly constructed/committed cycle route connects the site with Coventry along the southern side of the A45 with Prologis Park. As a result there is an existing link for non-car users that can be co-joined directly into the site. This cycle connection would put a significant catchment of potential employees within easy cycling distance of the site.



The scheme will be designed with public transport and active travel at the forefront.



New pedestrian and cycle links will be created, linking with existing routes on the Tolbar End Roundabout, to Coventry, and with Ryton-on-Dunsmore.



The scheme will develop a high quality, high frequency bus service, linking the site to Coventry, Rugby, and surrounding areas. This will be designed to encourage sustainable travel to and from the site at the outset.



Several bus services already operate between Coventry, Leamington Spa and Rugby including Services 25, 86 and 63, which could be significantly improved to provide access to the development by public transport.



■ How?

# Addressing the Climate Emergency

<p>Striving to reduce embodied carbon in construction</p>	<p>Providing the opportunity for occupiers to reduce operational carbon</p>	<p>We build wise. Materials will be specified to ensure longevity and minimise the need for replacement or wastage.</p>
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<p>Minimum <b>BREEAM</b> 'Excellent', targeting 'Outstanding'</p>	<p>The scheme will reduce energy demand where possible and seek to maximise energy consumption from on-site sustainable sources such as PV panels..</p>	<p>Minimum A Targeting EPC A+</p>
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Encouraging Active Travel and changing commuter patterns through the creation of new connections and improving traffic flow.



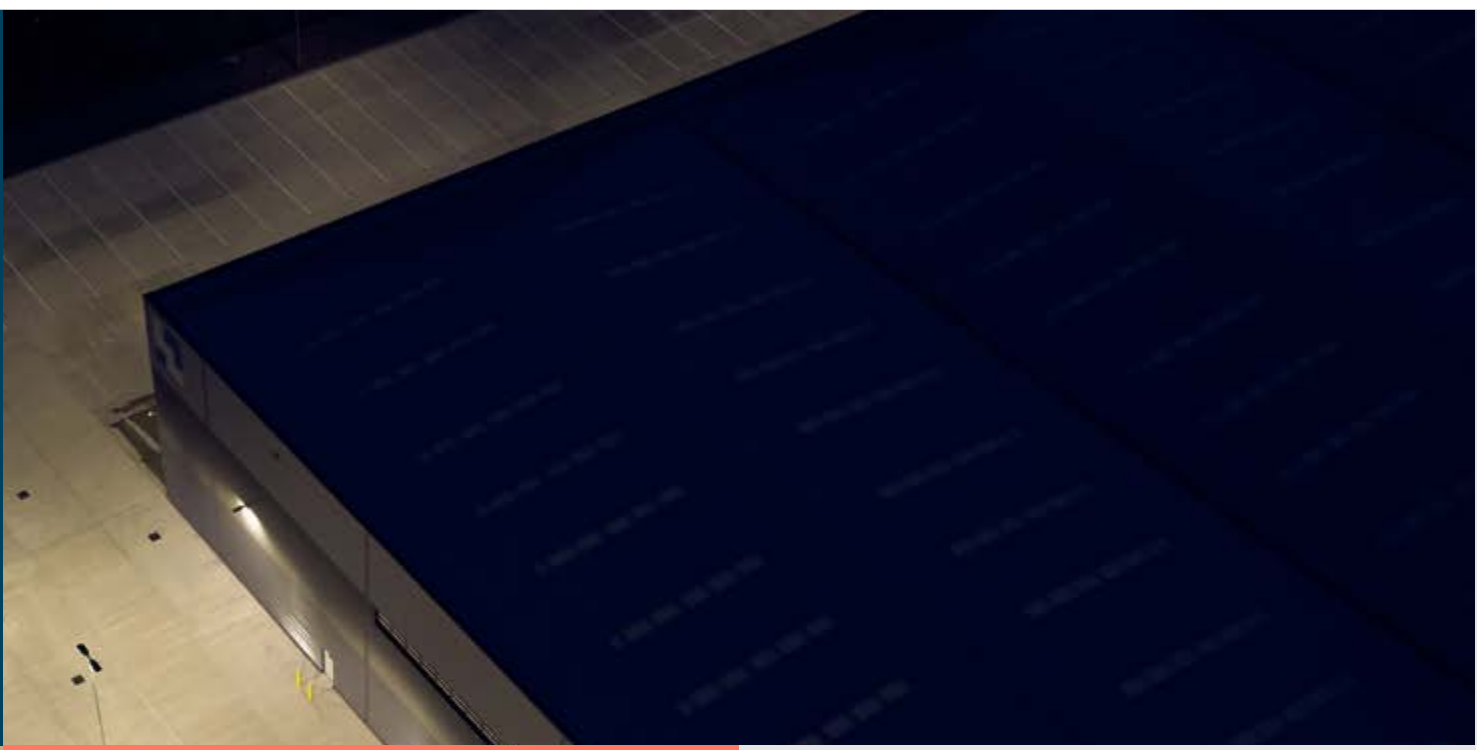





■ **The Developer: Mountpark**

We create big spaces,  
but operate in a  
*small world.*

A world where we know and remember people's names. Where we build close relationships with our customers and the communities around us. Where our tight-knit team of experts are focused on the small details that make a big difference. We might operate on a big scale – but we always stay close to what matters.

■ The Developer: Mountpark

<p>Committing to a Greener Future</p>		<p>30 Development professionals in 8 offices across Europe</p>	<p>€600+ million Of assets under management</p>
	<p>18m+ sq ft Completed since 2014</p>	<p>10 sites Capable of accommodating 1,000,000 sq ft</p>	
<p><i>Expertise</i></p>	<p>Mountpark is a specialist property development business and a wholly owned subsidiary of Affinius Capital®, an integrated institutional real estate investment firm focused on value-creation and income generation, operating within the UK and European industrial and logistics markets.</p>	<p>All buildings designed and constructed to achieve a minimum BREEAM Excellent but targeting</p> <p>"Outstanding"</p>	<p>12.8m sq ft Currently consented for development across 7 sites</p> 

# Summary

This masterplan approach document demonstrates how the Ryton site could come forward as its own discrete employment scheme and how, in combination with the Prologis land to the south, the combined schemes could come forward to deliver significant employment development.

The land at Ryton has the potential to make a meaningful contribution to the strategic employment needs identified by Rugby Borough Council's evidence base. Strategic sites are required to contribute and respond to regional needs, and Mountpark Ryton is ideally located on the urban edge of Coventry to meet those requirements. The proximity to Coventry and other urban areas presents the opportunity to deliver sustainable travel options to the development.

The site also has a unique opportunity to deliver extensive green spaces, most of which could comprise a new Country Park totalling approximately 55ha for the site as a whole, extending the existing community Park on the west of the River Avon. These green spaces would offer both ecological enhancements and increase public access to nature.

Mountpark intend to continue engagement with Rugby Borough Council and are working collaboratively with Prologis to ensure that the joint scheme could be brought forward in a comprehensive way.

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## **Appendix 2 – Mountpark Ryton – Transport Technical Note**

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# **WALKER ENGINEERING**

Consultants in Highways, Railways  
Bridges and Underwater Engineering

**Lawrence Walker Limited**

Church Farm House  
Leamington Hastings  
Warwickshire CV23 8DZ



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## **Mountpark**

**Land West of A423**

**Ryton-on-Dunsmore**

**Coventry**

### **TECHNICAL NOTE 1**

**Rugby Borough Council (RBC)  
Regulation 19 Response**

February 2026

**Land West of A423  
Ryton-on-Dunsmore  
Coventry**

**Technical Note 1**

**RBC Regulation 19 Response  
February 2026**

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**Figures**

- 1 Site Access Strategy

**Appendix**

- A Concept Masterplan
- B The Combined Scheme
- C A45 Gateway South Development
- D RBC Strategic Transport Assessment (SLR)
- E Toll Bar Island

## Land West of A423 - Ryton-on-Dunsmore - Coventry

### Technical Note 1 (February 2026)

#### RBC Regulation 19 Response

##### 1.0 [Introduction](#)

###### General

- 1.01 *Lawrence Walker Limited* (LWL) has been appointed by Mountpark (termed *The Developer* herein) to undertake an assessment of the possibility of providing a new commercial development to the west of the A423 Oxford Road at Ryton-on-Dunsmore. The scheme has been promoted through *Rugby Borough Council's* Local Plan (RBC) but was excluded in early 2026 from their intended Reg 19 submission on the back of a *Strategic Transport Assessment* (STA) produced by SLR (**Appendix D**).
- 1.02 LWL would firstly contend that the STA is flawed and does not provide a robust evidence base for the exclusion of *any* site from the Local Plan. More importantly, it does not consider the various components of a potential allocation individually, as shown schematically at **Figure 1** herein.
- 1.03 Secondly, it must be noted that *National Highways* (NH) were not consulted by either RBC or SLR on the STA, which given that nearly all roads in the area form part of their network, is a major shortcoming. Particularly so when Toll-Bar Island is cited by SLR as being their main concern with the sites. Whilst the A445 and A423 locally are controlled separately by *Warwickshire County Council* (WCC), it is unclear as to whether they support SLR's conclusions or not.
- 1.04 And finally, assumptions as to what Toll-Bar Island can or cannot accommodate in traffic terms are at best miss-guided, since they ignore safeguarding that was deliberately built-in to the current layout in 2016 as part of The C&W Gateway schemes (referred to simply as *The Gateway* or *Gateway* herein) on the A45 as per **Appendices C & E**. No significant attempt has been made by SLR to include what would have been, and remain, "quick wins" via these provisions to enhance capacity through the junction. This is discussed later in this Report.
- 1.05 Presented as a Technical Note (TN1), the Report takes the form of a response to the RBC's Reg 19 decision to exclude both sites (included as Ryton West in the Reg 18 Consultation Draft Local Plan) and includes an investigation as to what traffic impact would be caused by just allocating the Mountpark component. This has never been examined to date. In so doing, it offers an insight into the advantages that such an allocation would bring, as well as responding to a series of basic premises to demonstrate deliverability based the Concept Masterplan provided at **Appendix A**. The Masterplan for the combined Ryton West site is provided at **Appendix B**, with the larger component being controlled by Prologis.
- 1.06 LWL has been involved with the provision of major junctions for over 30 years, including the whole of the new *Gateway* junction on the A45 (**Appendix C**). They are local (being based at Leamington Hastings - just five miles distant) so are ideally placed to provide an understanding of road conditions across the area concerned. This knowledge has been built into TN1 and is presented from both an historic and current day perspective.

## Scope of Report

- 1.07 The report covers the following aspects of the potential allocation(s):-
- i) An *Introduction* is provided herein;
  - ii) The *Scheme Proposals* are examined at a high level;
  - iii) *Potential Traffic Impacts* of just the Mountpark site are assessed;
  - iv) *The Combined Scheme* is assessed to identify possible mitigation;
  - v) A *Regulation 19 Response* is provided for consideration by RBC, and
  - vi) A *Summary* is presented and *Conclusions* drawn.

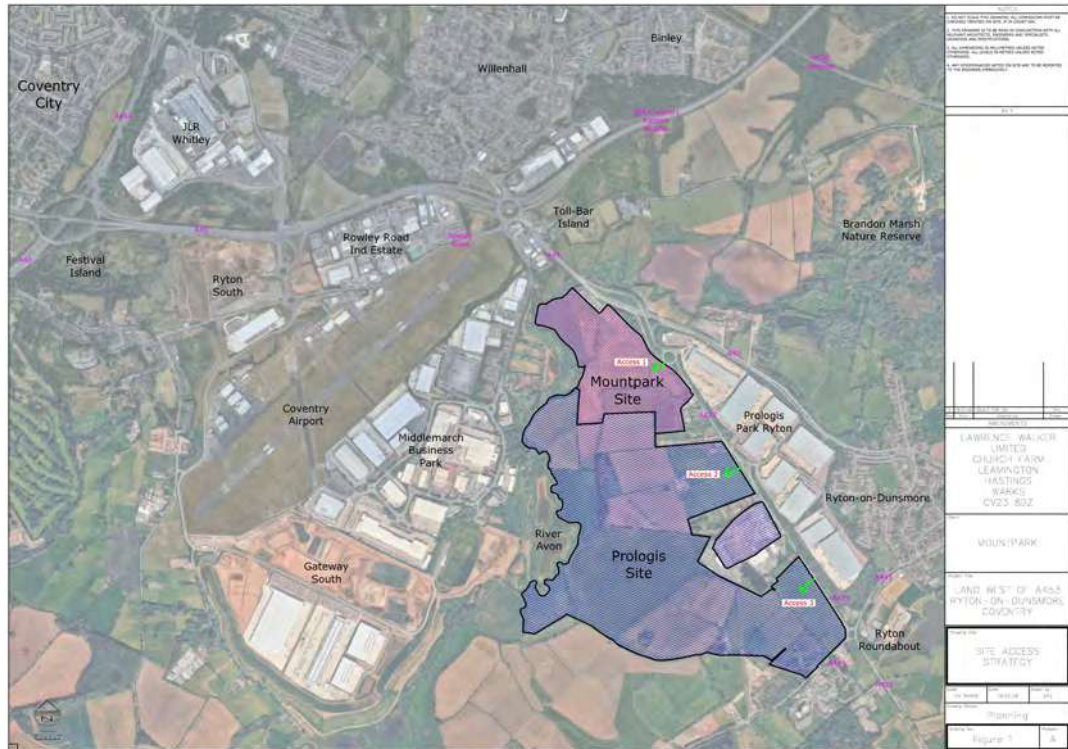
## Conclusion

- 1.08 The main conclusion reached is that the STA produced by SLR does not form a sound evidence base for the exclusion of *any* site to the south-west of RBC's administrative area. It cannot be relied upon; does not consider the possibility of allocating just the Mountpark site and ignores "quick wins", such as the safeguarding built-into Toll-Bar Island in 2016 to enable future capacity improvements to take place easily. As a result, further work should be undertaken by RBC in order to arrive at a sound position for the Regulation 19 submission to HM Government. That work should include a re-consideration of all land to the west of the A423 at Ryton-on-Dunsmore, and in particular the Mountpark component.
- 1.09 For the record, the "quick wins" referred to above and discussed later in this Report comprise:-
- Land safeguarded along the westbound A45 specifically to provide an extra lane in the future should it be needed;
  - Use of *The Gateway Demand Management System* to regulate eastbound traffic into Toll Bar Island;
  - Providing better lane usage around the western side of the rotary, through improved signage, and;
  - Changing the signal operating patterns at the junction to align with those developed for *The Gateway* site.

## 2.0 Scheme Proposals

### Local Designations

2.01 Locally, the south-eastern side of Coventry breaks-up into a series of small Villages and Industrial Estates that effectively form the outskirts of the City, interlinked by a small number of strategic orbital roads. The disposition of local villages and said roads discussed in this TN1 is show below and on **Figure 1** for future reference.



2.02 By way of clarification, details of the existing non-car transport networks are not discussed within TN1. This Report centres only on the shortcomings of the STA from a traffic perspective and identifying the impacts of the Mountpark site if it were to come forward in isolation.

### The Proposed Development

2.03 Details of the combined allocation are provided at **Appendix B**, and for the purposes of assessment herein are assumed to comprise the following development:-

- Moutpark Site – 72,000 sqm
- Prologis Site – 278,000 sqm
- Combined Site – 350,000 sqm

2.04 Land “Use Class” is likely to be predominately B8 as per *The Gateway* sites to the west and Prologis Park to the immediate east, with some B2 components envisaged. Traditional office uses are not planned.

2.05 Overall, the combined site would create in the order of 5,000 jobs, based on the take-up rates experienced locally for B8 uses. The Mountpark site in isolation would employ around 1,000 staff.

### 3.0 Potential Traffic Impacts

#### The Mountpark Masterplan & Access Strategy

3.01 The Mountpark Masterplan is provided at **Appendix A** and is reproduced below for ease of reference. A single point of access is proposed in accordance with **Figure 1**, which would see the creation of a fourth arm off the existing A423/A45 southern roundabout that also serves Prologis Park. The roundabout is lightly trafficked at peak times and LWL does not believe that there would be any capacity issues created locally following this addition. As such, the roundabout is deemed to be adequate by inspection and no further analysis has been undertaken for it as part of this TN1.



#### Potential Traffic Generation

3.02 LWL was involved in the original assessment of *The Gateway* sites and subsequent the monitoring thereof for Travel Plan purposes. Monitoring undertaken as recently as July 2025 indicates that the volume of peak hour traffic produced by the occupied buildings is significantly less than that assumed in the Dec 2017 TA. As such (and noting that it allowed for 30% B2 use), it would seem appropriate to adopt the TA Trip Rates as being both current and robust. These are reproduced below:-

**Table 3.1: Gateway Trip Rates (PCU's per 100 sqm)**

PEAK HOUR	IN	OUT	2-WAY
08:00-09:00	0.18	0.09	<b>0.27</b>
17:00-18:00	0.06	0.17	<b>0.23</b>

3.03 Applying these rates to the proposed 72,000 sqm of floor-space would suggest the following peak hour trips would result from allocating just the Mountpark site:-

**Table 3.2: Mountpark Total Trips (PCU's)**

<b>PEAK HOUR</b>	<b>IN</b>	<b>OUT</b>	<b>2-WAY</b>
08:00-09:00	135	65	<b>200</b>
17:00-18:00	45	130	<b>175</b>

### Potential Traffic Impacts

- 3.04 As can be seen from **Table 3.2**, the total amount of traffic generated by the Mountpark site in isolation would be modest. Moreover, its tidal direction is diametrically contra to the natural traffic patterns at Toll Bar Island at peak times, which sees large flows heading westbound towards Coventry along the A45 in the morning and eastbound away from it in the evenings. These would be added to (as a maximum) by 65 trips in the morning, reducing to just 45 in the evening, even if *all* Mountpark traffic decided to use the A45. Most unlikely, but it gives a very good indication as to just how little the Mountpark site in isolation would impact upon the operation of this key junction.
- 3.05 To put this into further context, today around 6,500 vehicles use Toll Bar Island during the AM Peak and slightly more at 7,000 during the PM. That excludes vehicles using underpass, which would not be impacted upon by Mountpark traffic. Noting then that about 1/3<sup>rd</sup> of Mountpark traffic (that heading to and from the east along the A45 and all local traffic using the A423 and A445) would not need to pass through Toll Bar at all, the total impact at the Island would be around **2%** at peak times. On the A45 westbound in the morning it would be even less at **1.5%** ( $65 \times 0.66 / 3,000$ ), whilst on the western side of the junction it would typically be below **1%** as the flows are lower and would split between the A45 and A46. Overall therefore, this site if allocated would have less than a **2%** impact on Toll Bar Island (or on any part thereof) and a negligible impact anywhere else on the *Strategic Road Network* (SRN) beyond it. This is not therefore a justifiable reason to remove the site from the Reg 19 submission and could easily be dealt with by simple measures such as better lane demarcations and signal timing alterations as discussed in **Section 4** of this TN1. The site should not therefore have been removed by RBC on traffic grounds; noting always that the Mountpark development was never actually looked at by SLR in isolation and divorced from the much larger Prologis scheme.
- 3.06 Finally looking at the local roads to the south, the eastbound A445 into the Ryton Roundabout in the mornings is busy and this would be expected to cater for an additional 30 vehicles or so; being 2/3<sup>rds</sup> of the 1/3<sup>rd</sup> x 135 trips that would not use Toll Bar Island. This is about a 5% impact, but could be dealt with easily by widening the current approach within the highway boundary to two lanes. It is already marked as a two-lane approach anyway, but is narrow and the outside lane is infrequently used as a result. Elsewhere, LWL sees little need for further interventions.

## 4.0 [The Combined Scheme](#)

### The Reg 18 Proposal

- 4.01 The Regulation 18 proposal for *Land West of A423* saw a joint “Combined” submission by Mountpark and Prologis for 350,000 sqm of largely B8 employment space being supported by RBC. That support was withdrawn in January 2026 following release of the STA penned by SLR. The key paragraph seems to be Para 6.57, which stated that with respect to Toll Bar Island:-

*It is unclear at this stage what further mitigation measures could be introduced at either of these locations [M6 Junction 1 and Toll Bar Island] to minimise the modelled impacts, and it is therefore suggested that these potential capacity constraints are discussed with National Highways before any further analysis is undertaken.*

- 4.02 This would appear to be the only negative statement regarding the combined site and it lead to the removal of both components from the Reg 19 submission. National Highways was never contacted and no effort was made to explore “quick wins” as noted earlier in this TN1, which are both concerning. Subsequent model runs were undertaken without the combined site being included and SLR advised that Toll Bar Island would perform better in such circumstances, which is hardly surprising. What they did not do was either contact NH, or more importantly see what work was needed at the junction to accommodate the combined site as-was.

### Potential Traffic Impacts

- 4.03 Combined allocation of the Mountpark and Prologis sites would see 350,000 sqm of largely B8 employment space being provided to the west of the A423, as indicated at **Appendix B** and reproduced below. Access would be from the A423, which three connections being proposed.



- 4.04 In so doing, the site would generate close to 1,000 peak hour movements two-way based on **Table 3.1** above, which in turn would represent approximately a 10% impact at Toll Bar Island. Whilst this is verging on material, it does not mean that that impact cannot be mitigated by applying the ‘quick wins’ set out herein.
- 4.05 To test this premise, looking at **Appendix C** it is worth recanting over what was assumed at the time *The Gateway* sites were promoted; both in the era before the 2016 Toll bar improvements were instigated and latterly in 2020 following the opening of the A45 Gateway Interchange itself.
- 4.06 On 21<sup>st</sup> December 2010 a meeting took place between the developers of *The Gateway* sites and the then SoS for Transport Mr. Philip Hammond MP to ensure that the proposed works to Toll Bar Island did not interfere with the delivery of the JLR part of that development. The meeting resulted in the entire Toll Bar Island improvement being moved 4m to the north to accommodate a fourth lane on the A45 (**Appendix E**). The lane was not subsequently built, but upon opening in 2016 the final layout allowed for it to be provided at some stage in the future should it be needed. That remains the position today. A “quick win” therefore exists to alleviate the westbound queues on the A45 that could easily be delivered by the combined sites if allocated. This premise was not looked at by SLR at all, which is clearly an omission on their part.



- 4.07 Secondly, at the time *The Gateway* A45 Interchange was being designed a significant amount of analysis was undertaken for Toll Bar to demonstrate to NH the acceptability of the proposal. To guard against possible weaving and queuing issues on the E/B Exit Slip to Toll Bar, a *Demand Management System* (DMS) was built into the final layout that would allow traffic from the developments to be routed via Rowley Road at peak times instead of the A45 if needed. This is shown in more detail at **Appendix C**. It remains extant and again would form a “quick win” if delivered by the combined sites at Ryton. This possibility was not even entertained by SLR either and it should have.
- 4.08 Finally, lane usage today around the western side of the rotary at Toll Bar is very poor and gap-acceptance even worse. This is a matter of fact.

- 4.09 The two combine to cause significant queuing where none should be present and it is often possible to sit on the E/B Exit Slip at the “Stop” line with the lights on red and not see a single other vehicle on the entire roundabout. The signal operating patterns allow this to occur frequently and the junction has never operated in the way that was intended when *The Gateway* scheme was being developed.
- 4.10 Lane usage reflects the kink around the north-west corner and this tends to concentrate vehicles into one lane as they spiral out towards the A46, leaving other lanes virtually empty. The signals on the rotary then detect the queue in the one lane and switch the opposing signals on the E/B Exit Slip to red to allow the queue to dissipate, simply transferring it to the Slip Road. This is an every-day occurrence and a particularly frustrating one for regular users of the junction. It is the third “quick win” shown on **Appendix C**.
- 4.11 Turning then to the *The Gateway* TA, whilst dated it shows the areas of the junction were expected to be under the most stress by 2026. These are reproduced below of ease of reference.

**Table 8.1: Junction 1 (A45/A46 Toll Bar Island) TRANSYT Results (2026)**

Approach or Link	AM Peak Hour		PM Peak Hour	
	DoS (%)	Queue	DoS (%)	Queue
A46 Eastern Bypass (N)	57	4	65	6
North Rotary	57	9	79	5
A45 London Road	72	12	53	7
East Rotary	<b>84</b>	9	60	5
Siskin Drive	49	2	63	6
South Rotary	<b>89</b>	14	82	13
A45 Stonebridge Highway	75	10	<b>79</b>	12
West Rotary	83	11	<b>86</b>	13
B4110	72	6	76	6
North-West Rotary	60	7	72	9

- 4.12 As can be seen from **Table 8.1**, the east and south rotaries in the mornings and the whole western side in the evenings would be the most stressed, as indeed is the case today. Providing the extra westbound lane would allow more green time along the east rotary and clearly add to capacity on the southern side, whilst a combination of the DMS and better signal phasing would solve the west. Overall therefore, it is highly likely in LWL’s view that “quick wins” alone as already built into the layout at Toll Bar could be used to completely mitigate the impact of the combined Ryton sites. None were explored by SLR and it is remiss of RBC to then base their Reg 19 proposals on what is clearly a flawed and incomplete assessment. Due to historic pre-planning, the impact of the combined sites at Toll Bar Island is wholly, easily, and cheaply, mitigatable.

## 5.0 Regulation 19 Response

### Base Premise

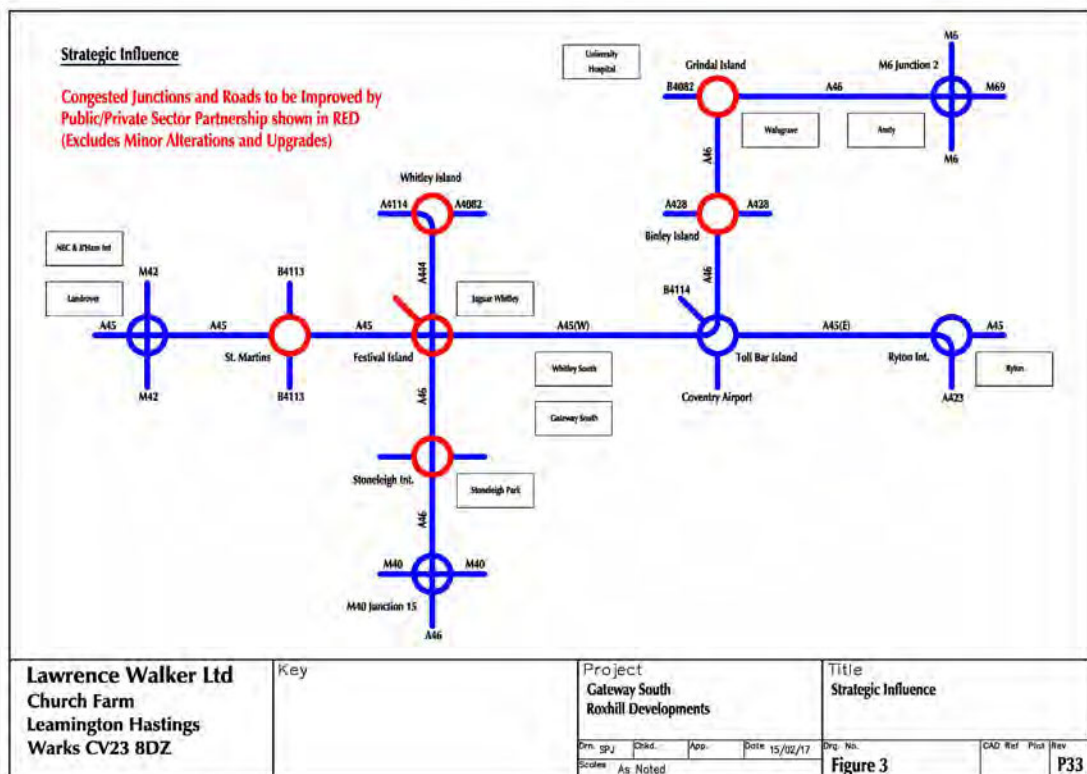
- 5.01 As a result of an STA produced by SLR Consulting (**Appendix D**), both the Mountpark and Prologis sites to the west of the A423 at Ryton-on-Dunsmore were excluded from RBC's intended Reg 19 submission. A joint rebuttal has been submitted by the two developers covering the combined sites, but below is LWL's commentary on just the Mountpark land. It should specifically be noted that at no time has this site been examined by either SLR or RBC in isolation, and that in itself is a significant shortcoming in the appraisal process. It does not, in LWL's view, suggest that the evidence used to underpin the Reg 19 is in any way sound.

### Principle Objections

- 5.02 There are four points of concern that would lead LWL to challenge the current exclusion of the Mountpark site from the Reg 19 submission. These comprise:-
- The use of a pre-Covid Transport Model to provide the primary data for the assessment of sites along the SRN. This is completely flawed and inappropriate in 2026. It is not WebTAG compliant and should have been replaced with an up-to-date model. No reliance can be attached to any of the SLR findings as a result and this aspect will be challenged by LWL at any subsequent EiP;
  - No attempt was made by either SLR or RBC to contact *National Highways* (NH) before excluding sites that may or may not have a material impact on their SRN. This is unfathomable;
  - Attempts by SLR to mitigate the combined sites at Toll Bar Island by tweaking signal timings ignores a series of "quick wins" that were historically built into the current layout to allow exactly this optimisation to take place. As a result, the assessment underestimates future capacity and overestimates the degree of difficulty in delivering it, and;
  - Nowhere has the Mountpark site been examined in isolation and divorced from the Prologis land. This leads to a poor audit trail for the Reg 19 submission.

### Principle Observations

- 5.03 The lack of consultation with NH is a matter of fact and not one that LWL can expand upon at this time. Either in terms of the reasoning behind their exclusion or indeed what they might have actually said if consulted. No doubt they will make their position clear at the EiP. The lack of separation of the two sites and the missing of the "quick wins" are covered previously in this TN1. That leaves the use of a dated traffic model as LWL's main concern.
- 5.04 Fundamentally, use of a pre-Covid model to determine impacts along SRN around Coventry pre-dates *The Gateway* Interchange and the Binley Fly-Over (**Appendix C**). Both of these will have affected the base flows and distributions around Toll Bar very significantly (and to its benefit), but also at Walsgrave, where the Flyover has simply shifted the massive queues from there up the road to it each day. *The Gateway* Interchange takes traffic under the A45 via the tunnel and thence into JLR from the new Interchange, as opposed to off Toll Bar directly as it did before. Ignore this and you must get the wrong answer at Toll Bar. This cannot ever be a sound starting point for determining where to allocate land in a Local Plan.



- 5.05 Moreover, the SLR model comes from an age where few people worked from home; few had smart phones; TEAMS did not exist and Broadband speeds were about 30 times slower than they are today. LWL recently took part in an Inquiry in October 2025 objecting to a £200m bus scheme in Cambridge that was underpinned by a pre-Covid 2018 traffic model. The results of that Inquiry are not yet known, but LWL invited the Inspectors to dismiss the submission as being unsound because of the age of the model. In 2026 LWL would invite the Inspector at the RBC Local Plan EiP to do the same. It is fundamentally unsound to use a 2018 model in 2026 and the WebTag Guidance would never support such an approach.
- 5.06 It is worth noting here too that also there are actually *two* SLR reports and a Non-Tech Summary. The two main reports show the impacts at Toll Bar both with and without the "Prologis" site as they call it. Based on the difference between the two, they then conclude that without Prologis there is much less of an impact at Toll Bar. Indeed so. However (and as noted above in this TN1) they have made no attempt it would seem to demonstrate that that impact is in fact acceptable and even if not, that it could be easily mitigated by operating the junction how it was supposed to be via the "quick wins". And all based on 2018 data. RBC has then removed the "Prologis" site based on this evidence alone as discussed earlier, which is wholly unsound and not fit for purpose. 2018 data simply cannot be used to support a Local Plan in 2026.
- 5.07 Specifically, at Para 2.28 of the earlier report SLR notes 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.*
- 5.08 2016 pre-dated Toll bar opening and cannot thus carry any weight today.
- 5.09 At Para 4.30 they note that:-

*The first stage of mitigation should therefore focus on opportunities to optimise the signal configurations where possible to reduce or balance out queue impacts.*

5.10 Correct, and LWL would have expected SLR at the very least to have started by using the settings and phasing developed for *The Gateway* scheme. This was not done as their model pre-dates that scheme so could not have included for it.

5.11 Next at Paras 6.53 & 6.54 it is stated that:-

*In line with the average journey time results, there remain impacts once the Local Plan sites are included within the modelling, along with the signal timing optimisation, albeit the extent of these queues is largely reduced compared with the previously reported Do Nothing scenario.*

*The AM and PM results both indicate that only the A46/A45 Toll Bar End junction will continue to experience significant queue impacts. Queue increases also continue to be predicted at M6 Junction 2 and are most notable in the PM period, albeit these are not as significant as those modelled at the A46/A45 Toll Bar End junction.*

5.12 LWL would contend that you cannot model future year queuing accurately when you start with very dated traffic flows based on 2018 data; expand them out to 2042 and then try to mitigate impacts by tweaking signal timings. The starting point should have been current-day flows; extrapolate *them* out to 2042 using current growth predictions and then resolve any queues that form by altering the whole junction via the built-in “quick wins”.

5.13 And finally at Para 6.57 of this report:-

*It is unclear at this stage what further mitigation measures could be introduced at either of these locations to minimise the modelled impacts, and it is therefore suggested that these potential capacity constraints are discussed with National Highways before any further analysis is undertaken.*

5.14 This has not been done.

5.15 Looking then at the second report, SLR states at Para 4.24 that Toll Bar “works”:-

*...largely due to the removal of the previously tested Prologis Park West site, and replacement with the Walsgrave Hill site, which has a lower level of impact on the most sensitive part of the RRAM model network – the A45/A46 Toll Bar End junction.*

5.16 Indeed so, but no attempt has been made to run a realistic model and then operate Toll Bar as it was intended.

5.17 And finally at Para 4.29:-

*The revised development inclusions within the Regulation 19 Submission scenario have a much lower level of impact on the A45/A46 Toll Bar End junction, where the original STA reported significant queue impacts, which are now removed.*

5.18 This cannot be confirmed as true having based the analysis on an unsound model. Even if it were, then an updated model would itself show that Walsgrave falls over with the development placed there instead, achieving nothing,

- 5.19 The whole assessment process is unsound in LWL's view, based as it is on pre-Covid data and a road network that does not reflect today's layouts nor travel patterns. The process should be updated and repeated so that a proper assessment of the various competing sites can be clearly seen and scrutinised.
- 5.20 Local Plans that are presented for examination by the public in 2026 cannot do so based on 2018 data. This is unsound and will be challenged by LWL if not corrected.

## 6.0 [Summary & Conclusions](#)

### Summary

6.01 *Lawrence Walker Limited* (LWL) has been appointed by Mountpark (termed *The Developer* herein) to undertake an assessment of the possibility of providing a new commercial development to the west of the A423 Oxford Road at Ryton-on-Dunsmore. The scheme has been promoted through *Rugby Borough Council's* Local Plan (RBC) but was excluded in early 2026 from their intended Reg 19 submission on the back of a *Strategic Transport Assessment* (STA) produced by SLR (**Appendix D**).

6.02 Presented as a Technical Note (TN1), the Report takes the form of a response to the RBC's Reg 19 decision to exclude both sites (included as Ryton West in the Reg 18 Consultation Draft Local Plan) and includes an investigation as to what traffic impact would be caused by just allocating the Mountpark component. This has never been examined to date. In so doing, it offers an insight into the advantages that such an allocation would bring, as well as responding to a series of basic premises to demonstrate deliverability based the Concept Masterplan provided at **Appendix A**. The Masterplan for the combined Ryton West site is provided at **Appendix B**, with the larger component being controlled by Prologis.

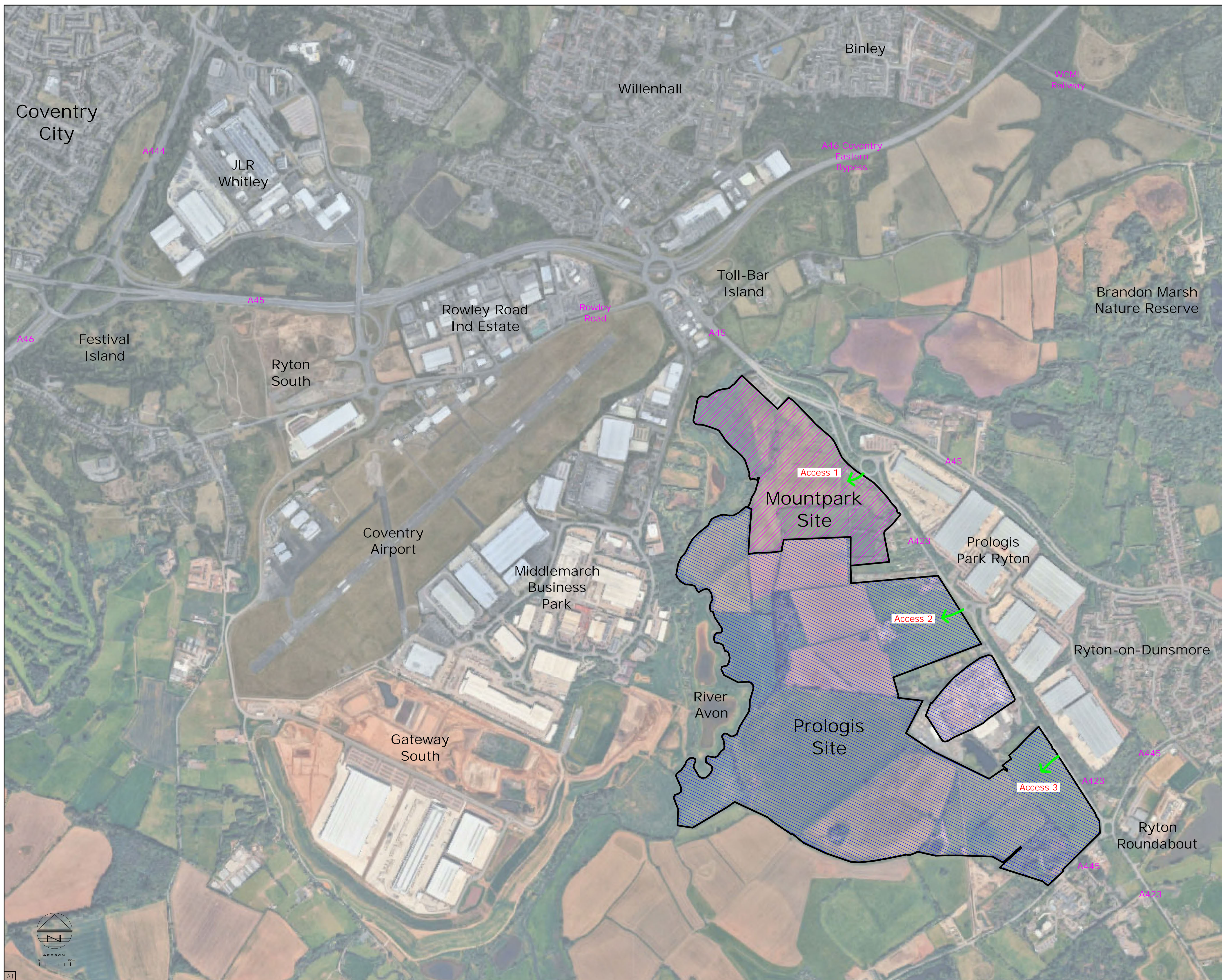
### Conclusion

6.03 The main conclusion reached is that the STA produced by SLR does not form a sound evidence base for the exclusion of *any* site to the south-west of RBC's administrative area. It cannot be relied upon; does not consider the possibility of allocating just the Mountpark site and ignores "quick wins", such as the safeguarding built-into Toll-Bar Island in 2016 to enable future capacity improvements to take place easily. As a result, further work should be undertaken by RBC in order to arrive at a sound position for the Regulation 19 submission to HM Government. That work should include a re-consideration of all land to the west of the A423 at Ryton-on-Dunsmore, and in particular the Mountpark component.

6.04 For the record, the "quick wins" referred to above comprise:-

- Land safeguarded along the westbound A45 specifically to provide an extra lane in the future should it be needed;
- Use of *The Gateway Demand Management System* to regulate eastbound traffic into Toll Bar Island;
- Providing better lane usage around the western side of the rotary, through improved signage, and;
- Changing the signal operating patterns at the junction to align with those developed for *The Gateway* site.

## Figures



**NOTES**

- DO NOT SCALE THIS DRAWING. ALL DIMENSIONS MUST BE CHECKED/ VERIFIED ON SITE. IF IN DOUBT ASK.
- THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ARCHITECTS, ENGINEERS AND SPECIALISTS DRAWINGS AND SPECIFICATIONS.
- ALL DIMENSIONS IN MILLIMETRES UNLESS NOTED OTHERWISE. ALL LEVELS IN METRES UNLESS NOTED OTHERWISE.
- ANY DISCREPANCIES NOTED ON SITE ARE TO BE REPORTED TO THE ENGINEER IMMEDIATELY.

**KEY**

Rev	Date	Description	Drawn
A	19.02.26	ISSUED FOR USE	SPJ

**AMENDMENTS**

LAWRENCE WALKER LIMITED  
 CHURCH FARM  
 LEAMINGTON  
 HASTINGS  
 WARCS  
 CV23 8DZ

Client  
 MOUNTPARK

Project Title  
 LAND WEST OF A453  
 RYTON-ON-DUNSMORE  
 COVENTRY

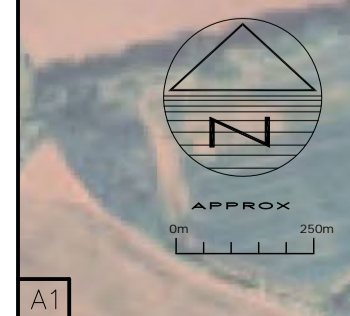
**Drawing Title**

SITE ACCESS STRATEGY

Scale: As Noted      Date: 19.02.26      Drawn by: SPJ



Drawing Status: Planning

Drawing No: Figure 1      Revision: A



**Appendix A**  
**Concept Masterplan**

KEY:

-  Site Boundary
-  Existing Trees / Woodland
-  Existing Hedgerows / Other Planting
-  Existing Ponds / Water Features (including off-site)
-  Existing Public Right of Way
-  Proposed Footways / Redirected PROW and / or Cycleways (Off Road)
-  Proposed Woodland / Structural Planting / Scrub
-  Proposed / Translocated Hedgerows
-  Grassland / Open Space (Existing and Proposed)
-  Proposed Ponds / Wetlands / Drainage Features
-  Proposed Individual / Hedgerow Trees / Small Tree Groups



**Appendix B**  
**The Combined Scheme**



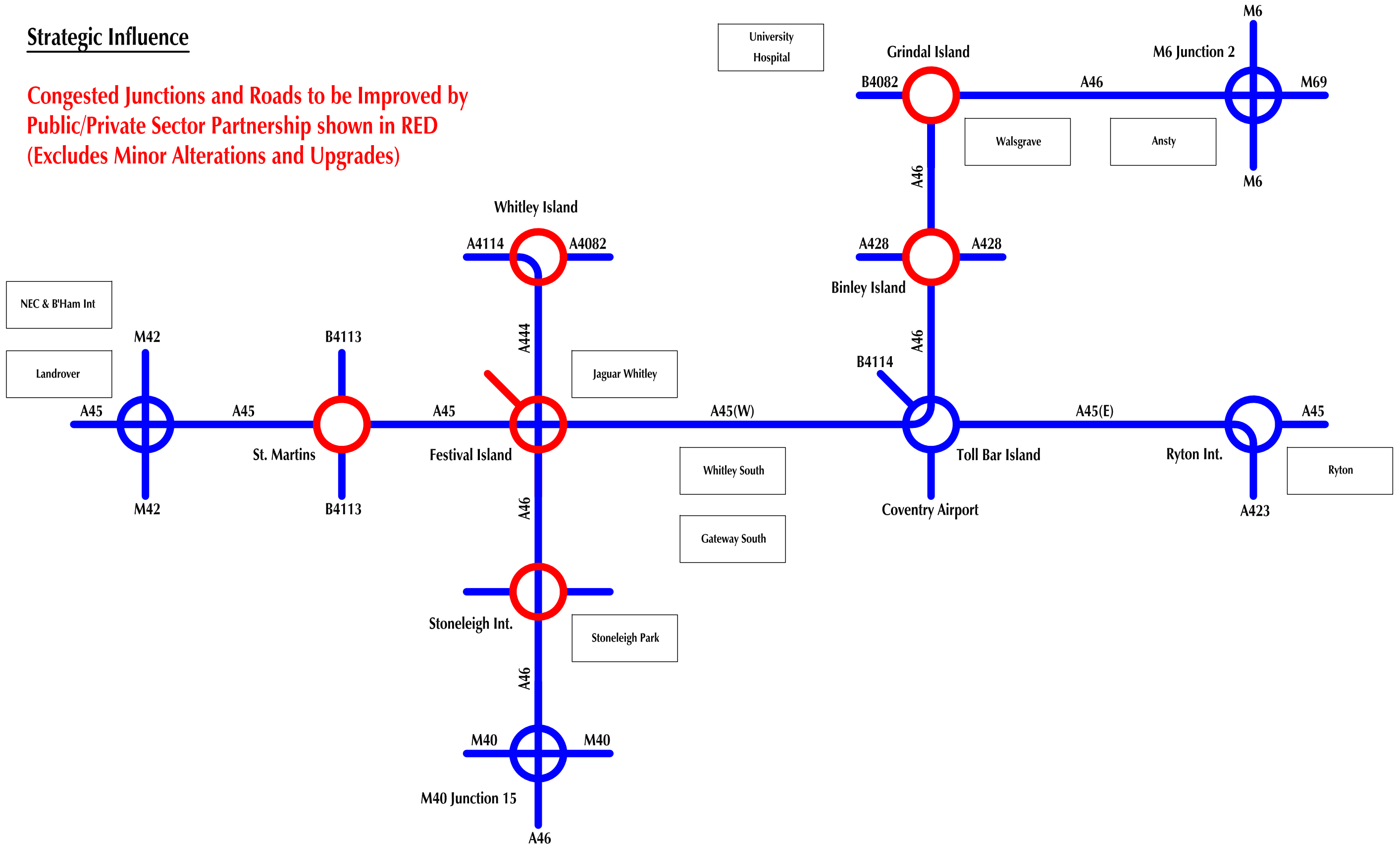
## Appendix C

### A45 Gateway South Development



# Strategic Influence

**Congested Junctions and Roads to be Improved by Public/Private Sector Partnership shown in RED (Excludes Minor Alterations and Upgrades)**



**Lawrence Walker Ltd**  
**Church Farm**  
**Leamington Hastings**  
**Warks CV23 8DZ**

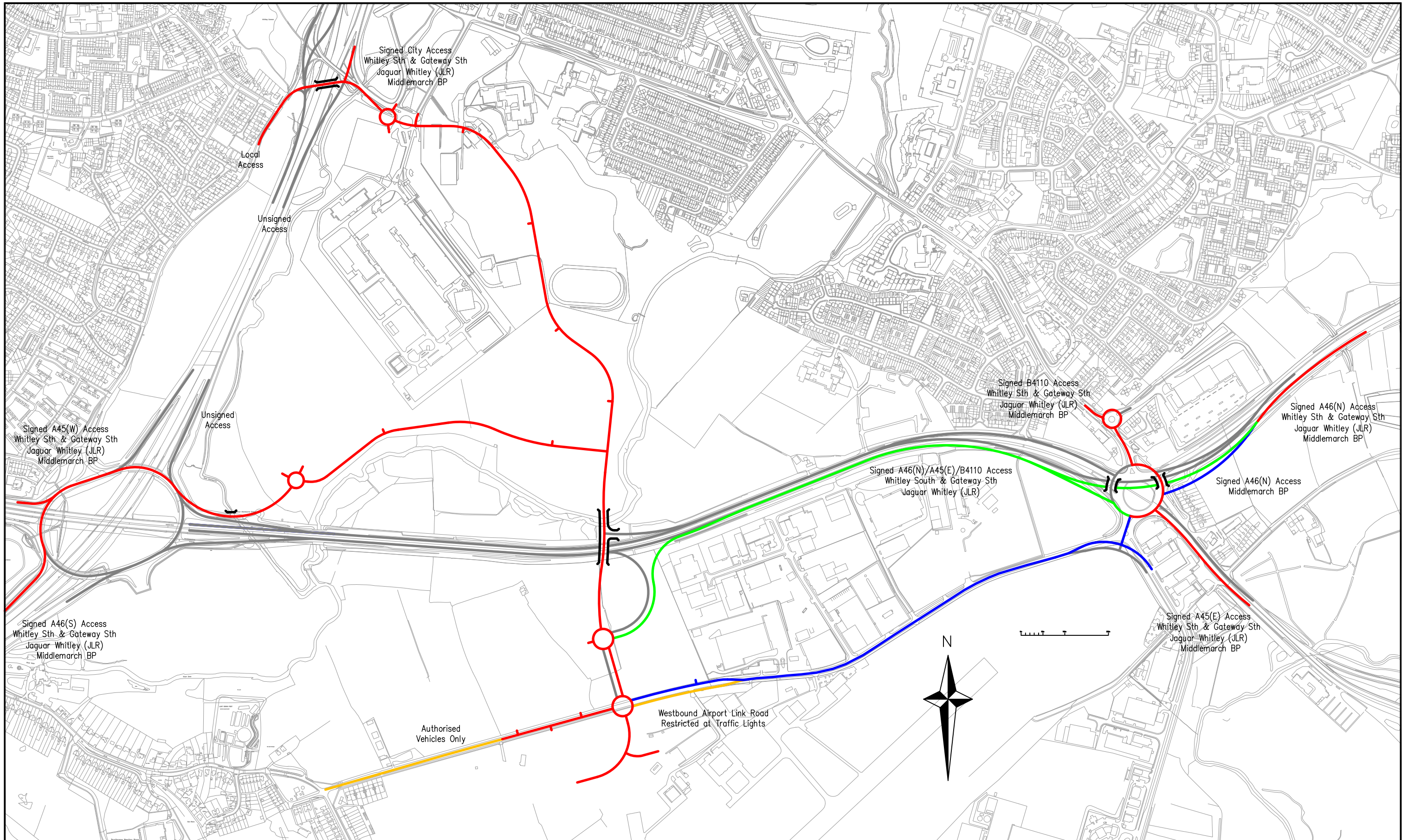
Key

Project  
**Gateway South**  
**Roxhill Developments**

Title  
**Strategic Influence**

Drn. SPJ	Chkd.	App.	Date 15/02/17
Scales As Noted			

Org. No.	CAD Ref	Plot	Rev
<b>Figure 3</b>			<b>P33</b>



**Lawrence Walker Ltd**  
**Church Farm**  
**Leamington Hastings**  
**Warks CV23 8DZ**

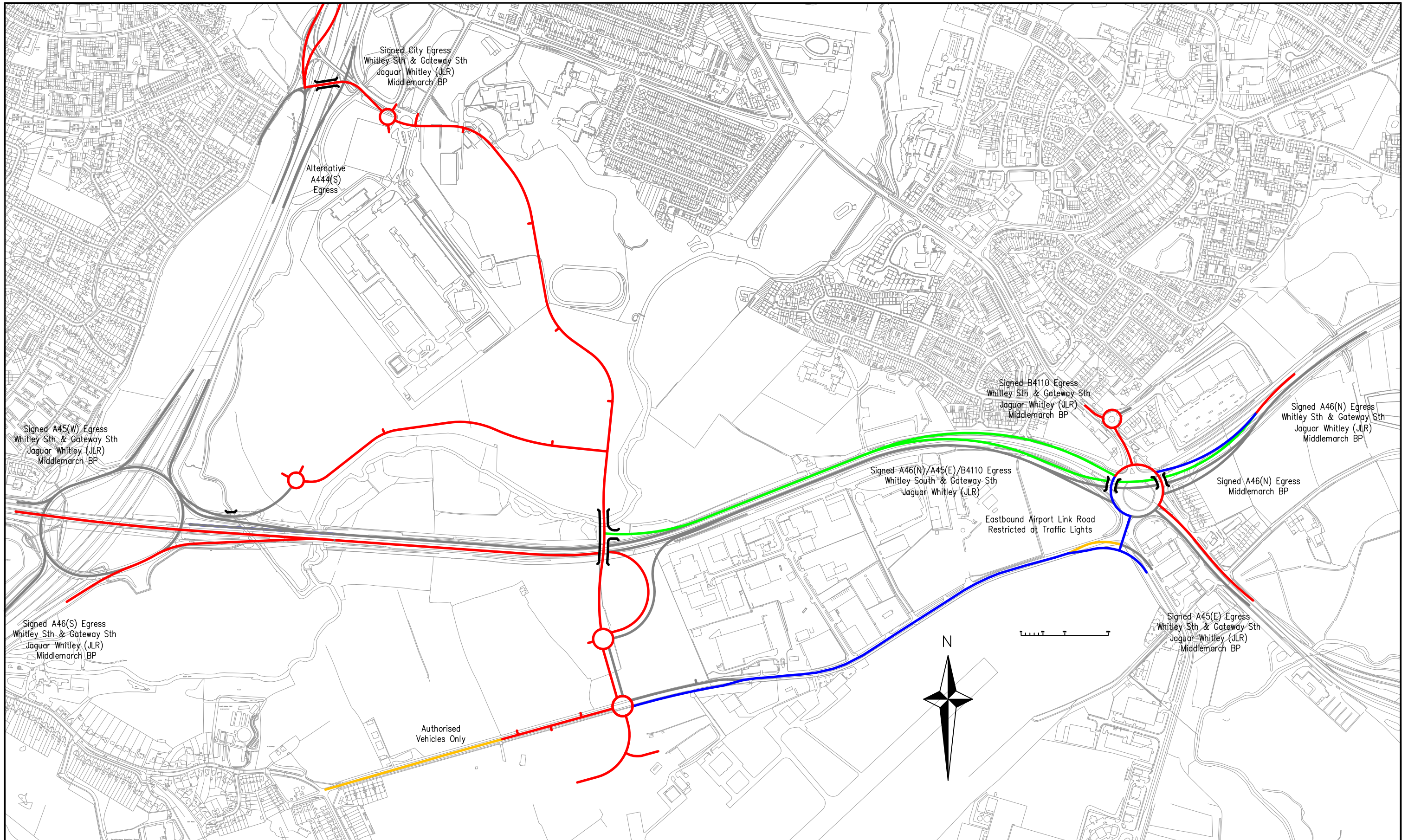
Key	
<span style="color: red;">—</span>	Signed Whitley Sth, Gateway Sth, JLR & Middlemarch Access
<span style="color: green;">—</span>	Signed Whitley Sth & JLR Access
<span style="color: blue;">—</span>	Signed Middlemarch Access Only
<span style="color: yellow;">—</span>	Access Restricted
<span style="color: grey;">—</span>	Unsigned Routes

**Project**  
**Gateway South**  
**Roxhill Developments**

Drn. SPJ	Chkd.	App.	Date 15/02/17
Scales As Noted			

**Title**  
**Site Access**  
**Traffic Routing (AM Peak Hour)**  
**Inbound Primary Accesses**

Org. No.	CAD Ref	Plot	Rev
<b>Figure 4</b>			<b>P33</b>



**Lawrence Walker Ltd**  
**Church Farm**  
**Leamington Hastings**  
**Warks CV23 8DZ**

Key	
<span style="color: red;">—</span>	Signed Whitley Sth, Gateway Sth, JLR & Middlemarch Egress
<span style="color: green;">—</span>	Signed Whitley Sth & JLR Egress
<span style="color: blue;">—</span>	Signed Middlemarch Egress Only
<span style="color: yellow;">—</span>	Egress Restricted
<span style="color: grey;">—</span>	Unsigned Routes

**Project**  
**Gateway South**  
**Roxhill Developments**

Drn. SPJ	Chkd.	App.	Date 15/02/17
Scales		As Noted	

**Title**  
**Site Access**  
**Traffic Routing (PM Peak Hour)**  
**Outbound Primary Egresses**

Org. No.	CAD Ref	Plot	Rev
<b>Figure 5</b>			<b>P33</b>

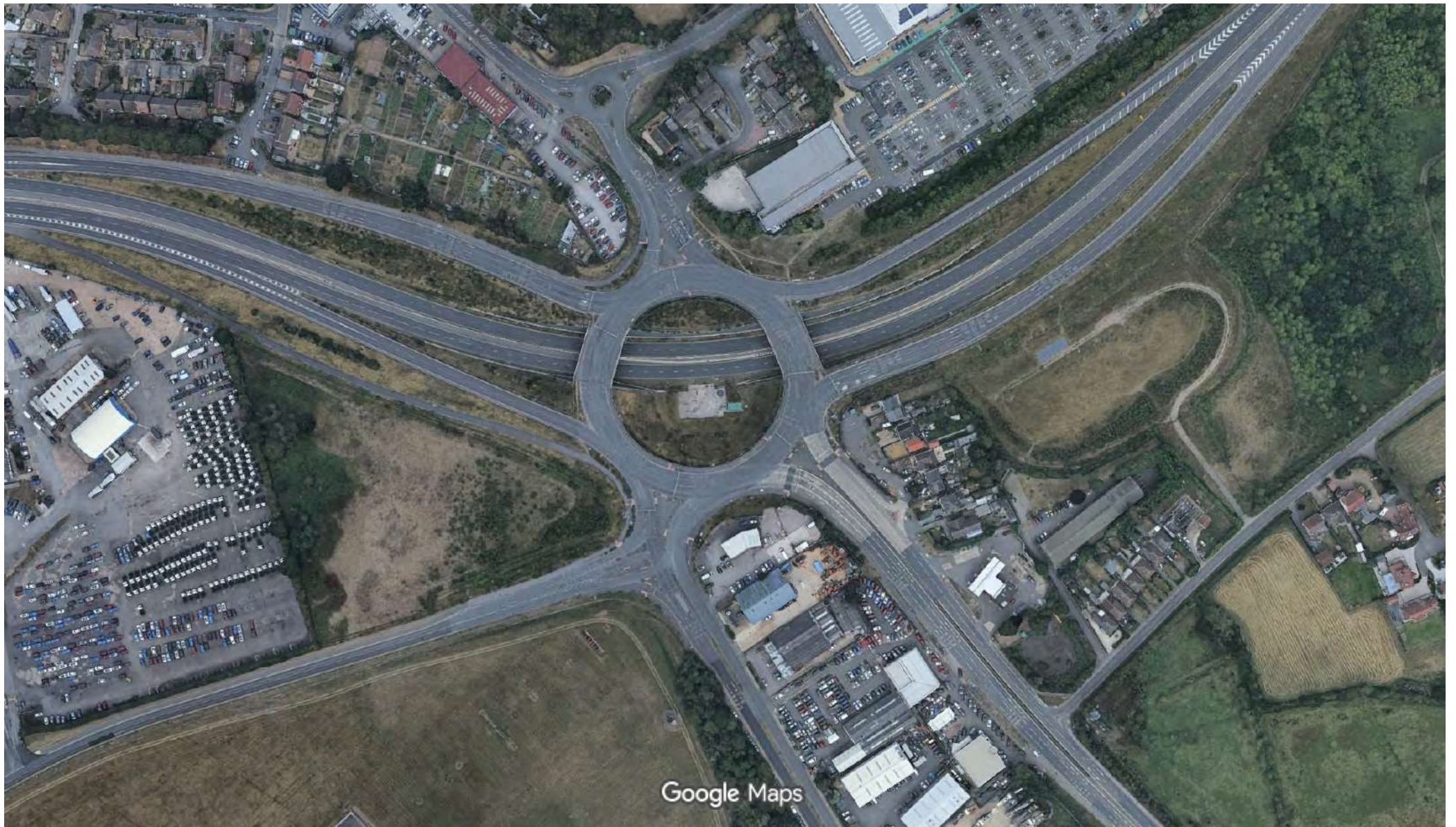
**Appendix D**

**RBC Strategic Transport Assessment (SLR)**

**Removed Due to Size of Report**

**Available on RBC Website or on Request**

**Appendix E**  
**Toll Bar Island**



Google Maps

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# **Appendix 3 – Ryton West – Transport Technical Note**

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Prologis UK Limited and Mountpark

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# **RYTON WEST**

Response to RBC Evidence Base for Transport





Prologis UK Limited and Mountpark

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## **RYTON WEST**

Response to RBC Evidence Base for Transport

**TYPE OF DOCUMENT (VERSION) CONFIDENTIAL**

**PROJECT NO. UK70088864**

**OUR REF. NO. REP\_019**

**DATE: MARCH 2026**

WSP

Level 2

100 Wharfside Street

Birmingham

B1 1RT






WSP.com

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# QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks				
Date	12 March 2026			
Prepared by	Divya Govindaraju			
Signature	 Digitally signed by Divya.Govindaraju@wsp.com DN: cn=Divya.Govindaraju@wsp.com Date: 2026.03.13 14:49:47 +05'30'			
Checked by	Sravani Vuppala			
Signature	 Vuppala, Sravani (UKSXV008)			
Authorised by	Dan Griffiths			
Signature	 Griffiths, Dan (GBDG131890)			
Project number	UK70088864			
Report number	REP_019			
File reference				

# EXECUTIVE SUMMARY

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This report was prepared on behalf of Prologis UK Ltd and Mountpark who are promoting the Prologis Park Ryton West and Mountpark Ryton sites, respectively. The combined sites have been assessed and were previously proposed to be allocated as 'Ryton West' at Regulation 18 stage; therefore, this report sets out the position in respect of the combined Ryton West site as a response to the Rugby Borough Council's Regulation 19 Local Plan consultation. It evaluates the adequacy and consistency of the transport evidence base used in the Local Plan, particularly the Strategic Transport Assessment (STA), and sets out why Ryton West remains a suitable strategic employment allocation. Key arguments centre on:

- A major omission is the exclusion of committed highway infrastructure near to Ryton-on-Dunsmore, most notably Firefly Road, which will have had a significant reduction in through traffic on Tollbar/A46 junction.
- Demonstration that impacts at A46/Tollbar roundabout have been overstated due to modelling parameters that have been applied, which has doubled the volume of development traffic generated by Ryton West when compared to agreements made with National Highways through pre-application engagement.
- That the incorrect model has been used to test development at Ryton West, as the RRAM does not include all local infrastructure delivered since traffic surveys were completed in 2017, whereas Warwickshire's Kenilworth and Stoneleigh Area Model includes these updates.
- Inconsistencies and issues with the modelling completed in the Warwickshire County Council's STA, including poor model calibration at A46/ Tollbar roundabout and use of traffic data pre-Covid-19.
- That the evidence presented in the STA is contrary to the previous Warwickshire County Council evidence presented at the Regulation 18 stage.
- Evidence that the site is sustainably located and there are options to mitigate the transport impacts.

Collectively, the issues identified with the assessment undertaken in the STA mean that the overall congestion modelled at Tollbar/A46 junction is overstated, and as a result, it cannot be depended upon. Accordingly, the sites dismissal has been made upon unsound evidence.

## Strategic Transport Assessment Review

Committed development has been applied across the modelling used in the STA, and generally, associated junction or sustainable travel improvements are included, especially for schemes in Rugby or near M6 J2, as the assessment of Walsgrave Hill includes the committed improvement to the A46 Walsgrave junction. Locally to Ryton West, traffic from committed development at the Coventry Gigafactory, Whitley South and Gateway South have all been included, but the transport investments schemes associated with these developments have not, such as new roads including Firefly Road which have been complete and opened since the RRAM model was developed. This means that the following interventions are not included, presenting an inconsistent approach with other committed developments tested elsewhere through the STA:

- Over £3.5m for improvements to local bus services and supporting infrastructure
- Over £3m improvements in highway improvements (which could include the A46/ Tollbar roundabout), as well as the now complete Firefly Road and Silver Eagle Way, and
- Over £2m for active travel improvements within proximity of Ryton West.

This causes incorrect traffic routing and inflated congestion forecasts at A46/ Tollbar roundabout. The main highway elements listed above are however included in Warwickshire County Council's Kenilworth & Stoneleigh Area Model and the Coventry Area Strategic model.

Through pre-application discussions with Warwickshire County Council and National Highways, trip rates (and resultant traffic generation) from Ryton West were agreed. However, these have not been used in the STA, and as a result, the trip generation from this development is overestimated by more than 2,000 two-way vehicle trips during each morning and evening peak period. This represents double the volume of development traffic generated by Ryton West when compared to agreements made with National Highways through pre-application engagement. There is also no testing of both Ryton West with Walsgrave Hill in the STA so the impacts of all sites, once these matters are corrected are unknown.

The STA, which for Ryton West (site 328) was assessed using the Rural Rugby Area Model (RRAM) contains multiple issues and inconsistencies which affect the validity of the findings in terms of queuing and congestion, and therefore questions the conclusions that are reached from the report findings. National Highways outlined the requirements for the STA, but have advised that they were not involved in the process and work presented to the Local Plan evidence base.

The traffic flows used in the modelling pre-date-COVID, and therefore cannot reflect the travel behaviour changes since. Furthermore, the model reporting confirms that the A46/ Tollbar roundabout is on the periphery of the RRAM model, reducing its accuracy and that the modelled flows at A46/ Tollbar are not well calibrated (by the WCC model reporting) on local turning movements.

Furthermore, no mode shift has been applied to sites assessed through the RRAM, despite local sustainable improvements that will reduce traffic and recognition of WCC on the accessibility of the site.

It states in the STA that signal optimisation has been applied to seek reduction in queues at the A46/ Tollbar roundabout. However, this is not effective, likely because the volume of traffic is substantially higher than would be the case, noting the observations from this report. Furthermore, no measures to physically increase capacity at A46/ Tollbar roundabout (reflecting the original CPO scheme and available highway land) have been considered.

Collectively these factors lead to:

- An overestimation (doubling) of the volume of traffic generated by the development.
- Overloading of the volume of traffic using A46/Tollbar junction.
- No allowances for potential improvements across the nearby transport network that would benefit and reduce local queueing and delays (and is inconsistent with the assessment of Walsgrave Hill).
- And therefore, highlights significant doubt in the conclusions reached on the overstated potential impact of the Ryton West on A46/ Tollbar roundabout.



- That the modelling work should be updated in collaboration with Ryton West and National Highways to address these issues.

### **Stakeholder Consultation to the Local Plan**

Prior to the latest evidence base for the Rugby Local Plan, WCC's 2024–25 evidence showed:

- High accessibility scores using Mobile Network Data, Public Transport Accessibility Level and bus Origin/Destination Accessibility analysis for Site 50 (Prologis Park Ryton West) and Site 328 (combined Prologis Park Ryton West and Mountpark).
- Minimal congestion near the Ryton West site, with both sites ranked as Category 6 (“edge-of-town, low congestion”), and
- A need for active travel enhancements and potential developer contributions, but no fundamental transport barriers to allocation.

These findings are then not consistent with the latest Warwickshire County Council evidence in the STA.

Similarly, National Highways had responded to previous consultations and commented on:

- The need for robust modelling, agreed assumptions, and collaboration.
- Raised no objection in principle to Ryton West.
- Confirmed in 2025 discussions that NH does not oppose the site's allocation.

### **Sustainable Transport Strategy**

A Sustainable Transport Strategy has been prepared for the proposed development at Prologis Park Ryton West, to further support the accessibility of the site that was recognised by WCC in their previous representations. The sustainable transport strategy outlines potential investment in active and sustainable travel to facilitate low carbon, non-car modes of transport for staff for both this development, as well as the existing Prologis Park Ryton through delivery of a vision-led transport strategy for Prologis Park Ryton West; the measures include:

- A public transport hub.
- extended bus services.
- on-site electric shuttle bus, and
- further enhancements to active travel infrastructure in and around the site.

In addition to the measures to be implemented with development at Prologis Park Ryton West, major committed schemes around Coventry and Warwickshire strengthen sustainable travel including the Coventry Very Light Rail connecting nearby to Ryton and LCWIP schemes in both Warwickshire and Coventry.

These improvements were not reflected in the Council's accessibility scoring or modelling—leading to understated sustainable travel benefits, and underestimating the potential for mode shift from this and other local employment sites. The consequence is a further overstated impact on the local highway network.



## Conclusion

The evidence presented in this report demonstrates that:

- Ryton West is sustainably located, well connected and capable of delivering significant active travel and public transport enhancements in accordance with the NPPF.
- The Council's modelling contains material inaccuracies in terms of the traffic data used (pre-COVID-19 and model calibration of some movements at A46/ Tollbar roundabout) and is inconsistent in the approach taken to local highway improvements (particularly near Ryton West), and so committed and constructed investment in the transport network near Ryton is not reflected.
- We therefore request that the modelling is updated in collaboration with Prologis and National Highways, having addressed the matters raised in this response.
- Regarding A46/ Tollbar roundabout, the traffic volumes have been overestimated in the STA (from committed developments and Ryton West), which results in overstated traffic impacts, queues and delays, and mitigation measures have not been considered.
- WCC has previously recognised the accessibility of the development, and that it was located in area of "edge-of-town, low congestion"); the STA starkly contrasts with the previous commentary, further indicating issues with the methodology undertaken, and
- Stakeholder bodies, including National Highways, have not objected to the principle of development at this site.

The transport evidence base does not robustly justify the transport score presented in the Sustainability Appraisal; and the evidence is unsound. It therefore does not support RBC's decision to remove Ryton West as a draft allocation in the Regulation 19 Proposed Submission Plan of the Rugby Local Plan Review. We respectfully request that the STA is reworked to address all issues identified through this appraisal.



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# 1 SETTING THE SCENE

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## 1.1 INTRODUCTION

- 1.1.1. This report was prepared on behalf of Prologis UK Ltd and Mountpark who are promoting the Prologis Park Ryton West and Mountpark Ryton sites, respectively. The combined sites have been assessed and were previously proposed to be allocated as 'Ryton West' at Regulation 18 stage; therefore, this report sets out the position in respect of the combined Ryton West site as a response to the Rugby Borough Council's Regulation 19 Local Plan consultation.
- 1.1.2. This report focuses and identifies issues with the Strategic Transport Assessment that was prepared and used for the transport and highways evidence base used for the Local Plan decision making. Further information on the sustainability of the proposed site at Prologis Park Ryton, along with stakeholder consultation reviews and consideration of potential improvements at A45/ A46 Tollbar roundabout are also provided.

## 1.2 REVIEW OF EVIDENCE BASE

- 1.2.1. This report demonstrates:
- That there are inconsistencies and issues with the evidence base used in the site allocation work submitted by or on behalf of Rugby Borough Council. This is likely to lead to incorrect conclusions on impact of the development traffic on highway network specifically at the A46/ Tollbar End junction.
  - The site is located in a sustainable location, that aligns with the NPPF, and can benefit other existing local uses.
  - The omission of committed infrastructure from nearby developments, including the completed Firefly Road, significantly undermines the validity of the model.
  - Accordingly, the incorrect model has been used to test development at Ryton West, as Warwickshire's Kenilworth and Stoneleigh Area Model includes these updates.
  - Transport stakeholder, including Warwickshire County Councils' findings at previous rounds of the Local Plan process (i.e. Reg 18) outlining the accessibility of the proposed development and low levels of network congestion that contradicts their latest evidence.
  - That National Highways has not objected to the principle of development at Ryton Wests.
  - That there are opportunities for the traffic impact at A46/ Tollbar roundabout reported in the councils evidence to be unlocked and reduced, through active travel, sustainable transport and capacity improvements in accordance with a Vision-led approach in accordance with the NPPF, and
  - That the modelling in the STA should be updated, having addressed the matters raised in this response in collaboration with National Highways and Prologis.

## 2 STRATEGIC TRANSPORT ASSESSMENT

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### 2.1 OVERVIEW

- 2.1.1. This section of the report sets out a comprehensive review of the approach adopted by Warwickshire County Council (WCC) in developing their transport evidence and response to the Local Plan process.
- Issues and inconsistencies in site assessment, including review of the reliability of the evidence base.
  - Updated information available was not used and the implications of this, and
  - Did not follow consultation and engagement requested by National Highways.
- 2.1.2. A Strategic Transport Assessment (STA) and STA Addendum have been prepared to support the local plan consultation. The STA Addendum evaluates the submission sites; therefore, this report does not provide additional commentary.

### 2.2 STA REVIEW

- 2.2.1. The Strategic Transport Assessment (STA) dated Oct 2025 Rev 1 was prepared by SLR Consulting Ltd (SLR) on behalf of Rugby Borough Council (RBC) and WCC to help inform the transport impacts of the Rugby Local Plan (draft Allocations) published as part of the Regulation 19 consultation.
- 2.2.2. All sites within Rugby have been assessed using the Rugby Wide Area (RWA) Model; sites peripheral to Coventry have been assessed using the Rugby Rural Area Model (RRAM).

#### **Modelling Observations:**

- 2.2.3. Para 2.28 of STA states that “RRAM base model was developed using majority 2018 base line data, supplemented by several 2017 counts and a 2016 count of the Stretton Baskerville Roundabout.”

#### **Review of the RRAM Local Model Validation Report**

- 2.2.4. The RRAM Local Model Validation Report (LMVR) dated May 2021 has been reviewed and the key points for considering the modelled results when assessing the impact of the development trips from the Ryton West are detailed below. The RRAM model extents suggest that the A46/Tollbar junction is on the periphery of the model. This junction is the first point of contact for the proposed development traffic from the Ryton on the strategic road network.
- 2.2.5. The RRAM model is calibrated both based on the turning movements / links and validated against the journey time data.
- 2.2.6. At the A46/Tollbar junction improvement is opened in March 2017 and count data utilised in modelling is obtained in April 2017 and 2018, prior to construction work starting at the A46 Binley junction to the north. These all pre-date COVID 19, and so the changes in travel behaviour that have occurred since are not reflected.
- 2.2.7. The Link flows calibration suggests that the A45 south to A46 Coventry Eastern Bypass link is not calibrated in the AM peak, with flows being overestimated in the model by 22% or PM peak with an overestimation of 28%. This is a key movement given it is the largest flow on the roundabout from the model information presented in the STA, and that this movement affects every part of the A46/ Tollbar roundabout

2.2.8. Since the STA reports that as the modelled flows are not calibrated local to Ryton, it is likely that junction operation appears worse in the model. This need to be considered when interpreting the results from the model.

Review of the RRAM Forecasting Note

2.2.9. The RRAM Forecasting Note dated October 2022 has been reviewed. It is understood that in 2021, Vectos Microsim produced a 2031 reference case model. This model has since been updated to incorporate all permitted, committed and funded highway schemes.

2.2.10. Figure 1 of the RRAM Forecasting provides details of the location of the Committed Development Sites. Key developments within the proximity of the Ryton West as well as closer to the A46/ Tollbar End junction which are anticipated to affect network operations include Whitley South, Gateway South, and the Giga Factory. It is noted that trips associated with these developments are allocated through external zones in the model, as there are currently no dedicated development zones for these developments.

2.2.11. In the Forecasting process section of the note, the 2031 future year flows were calculated based on TEMPRO, committed development traffic and a capping exercise to avoid double counting of the demand. However, it appears that no adjustments related to change in travel behaviour due to COVID-19 pandemic were made during the background growth assessment. This is likely to have impact on the modelling results.

2.2.12. There are 6 committed schemes included in the RRAM Forecast model of which the key schemes which are likely to impact along the operation along the A46 are A46 Binley Junction, A46 Walsgrave Junction and M6 J2, A46 approach signalisation.

2.2.13. The mitigation identified in support of the Whitley South, Gateway South, and the Gigafactory development is not included in the committed infrastructure of the 2031 forecast year reference case model. This is despite the funding being secured through Section 106 / conditions associated with their respective planning consent, which is inconsistent with many other committed sites tested in the STA.

2.2.14. In para 71 of the Forecasting Note, it is noted that the A46 Tollbar roundabout was particularly congested in the original 2031 Reference case model due to several of the committed developments routing via several of the nearby zones this issue persists in updated reference case in both morning and evening peak.

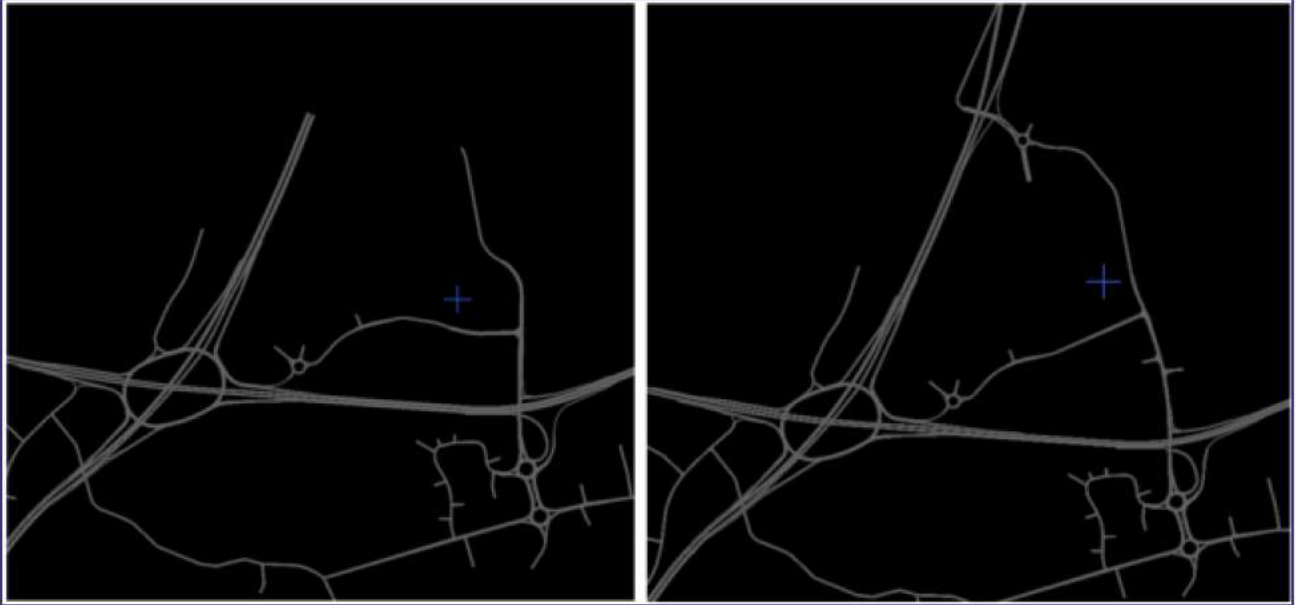
2.2.15. As detailed in Chapter 2 of the report, modifications to the highway network near the A46/Tollbar junctions have been implemented as part of infrastructure commitments related to ongoing developments. Notable changes include the construction of Silver Eagle Way and Firefly Road, which connect to Rowley Road and subsequently to Scimitar Way further north, linking to the A444. The 2031 forecast year model's network coding suggests that highway network changes were not incorporated.

2.2.16. These network changes will affect trip assignments from development-related traffic and may result in the rerouting of background traffic within the area, potentially impacting network operations specifically at A46/ Tollbar End junction.

2.2.17. For reference, the Kenilworth and Stoneleigh Wide Area (KSWA) model was utilised to evaluate the impact of traffic from the approved Gigafactory development on the surrounding highway network. An excerpt from the appendices of the model is provided in Figure 1 below to illustrate the changes to the network, which includes the key highway improvements such as Firefly Road.

**Figure 1: Changes in Network due to committed developments**

*Figure 1 – Network Extension*



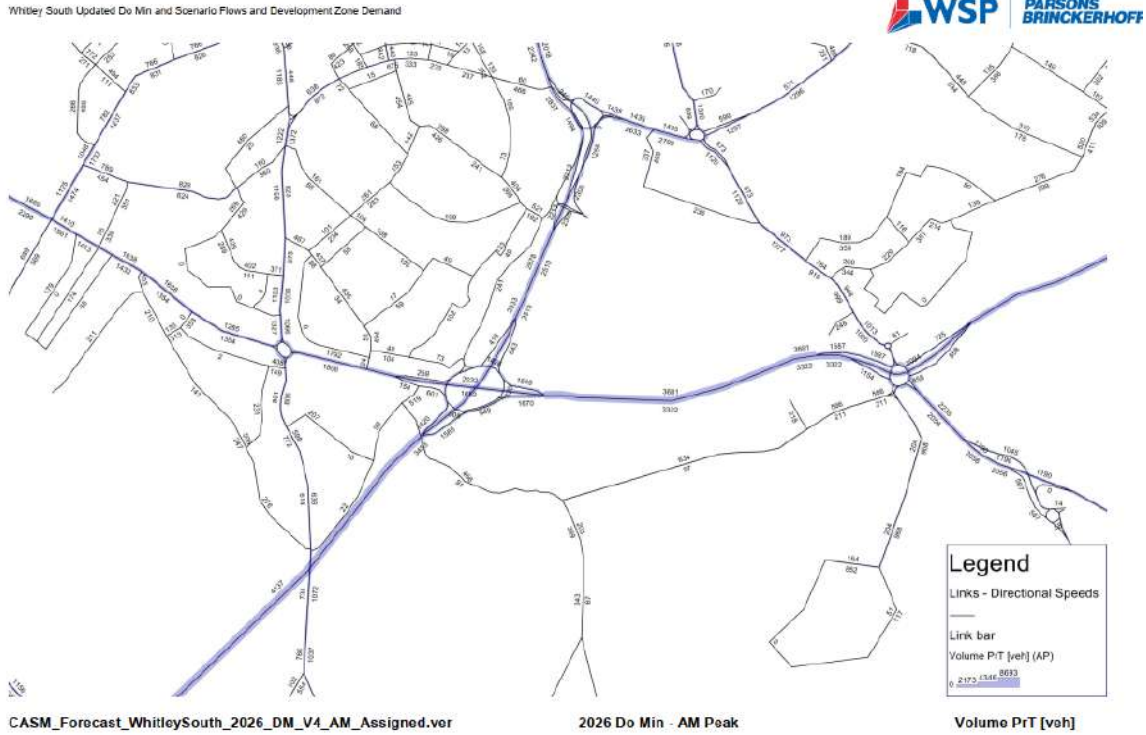
2.2.18. It is also noted in the Gigafactory Transport Assessment (TA), in 2026 reference case and 2026 reference case+ development scenarios modelling (using the KSAW), stated that the due to network changes there is reduction in flows forecasted towards A46/ Tollbar junction as shown in Figure 2.

**Figure 2: Extract from Giga Factory TA**

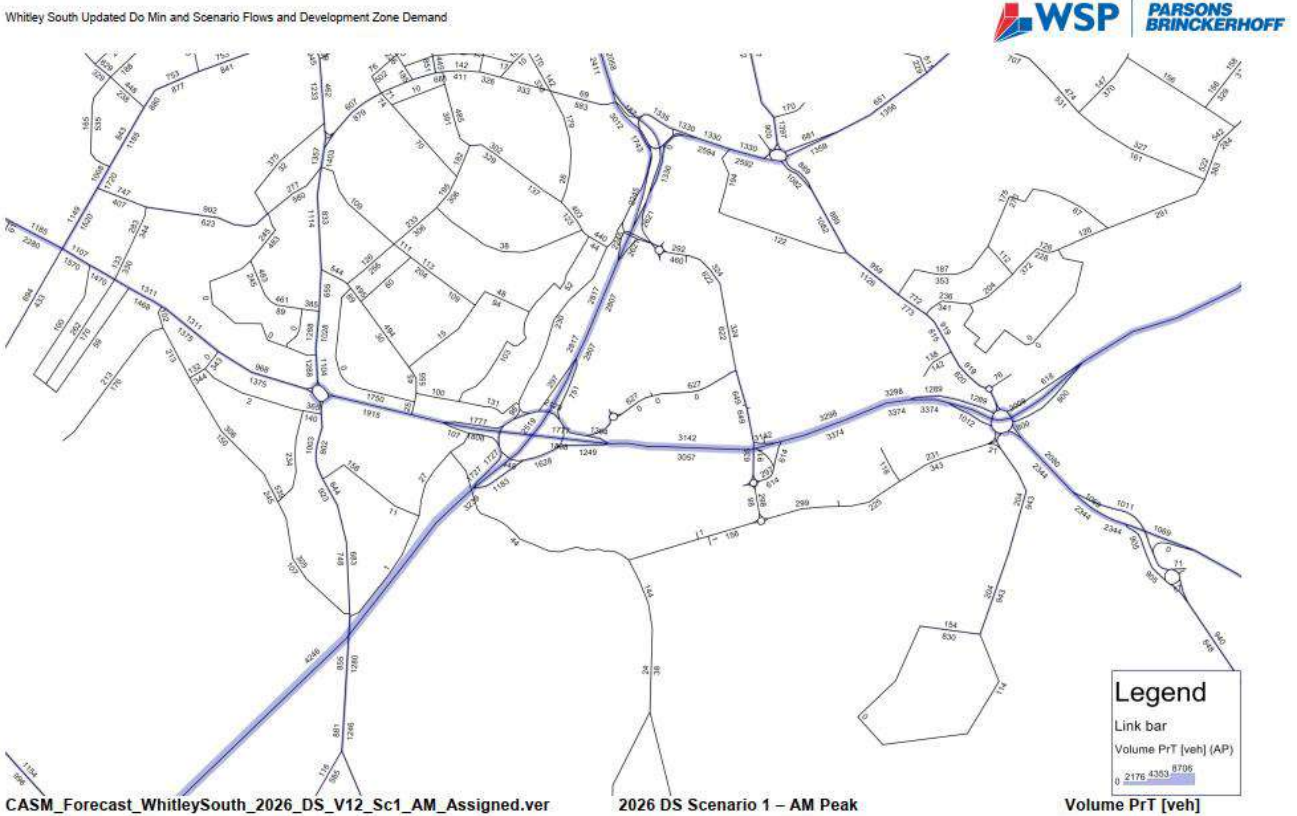
9.5.12 The most marked changes in journey times are consistent with corridors that experience queue length increases. The changes in journey times on the A45 between Stivichall Interchange and Tollbar during the PM peak period have been investigated further. The increase in queuing on this approach to Tollbar is minimal and the change in flow is also modest; a reduction in flow is forecast in the 17:00 to 18:00 period and an additional 51 vehicles in the 18:00 to 19:00 period, less than one vehicle per minute. As such, no further assessment or mitigation is deemed necessary.

2.2.19. In addition, in support of Whitley South TA, Coventry Area Strategic Model (CASM) has been updated to reflect the network changes near the A46/ Tollbar junction. These outputs show the reassignment of the traffic on the local and strategic network. An excerpt from the appendices of the model is provided in Figure 3 and Figure 4 below to illustrate the reassignment of traffic flows on the network.

**Figure 3: Extract from CASM – AM Peak without Firefly Road Traffic Assignment**



**Figure 4: Extract from CASM – AM Peak with Reassignment of Traffic through Firefly Road**



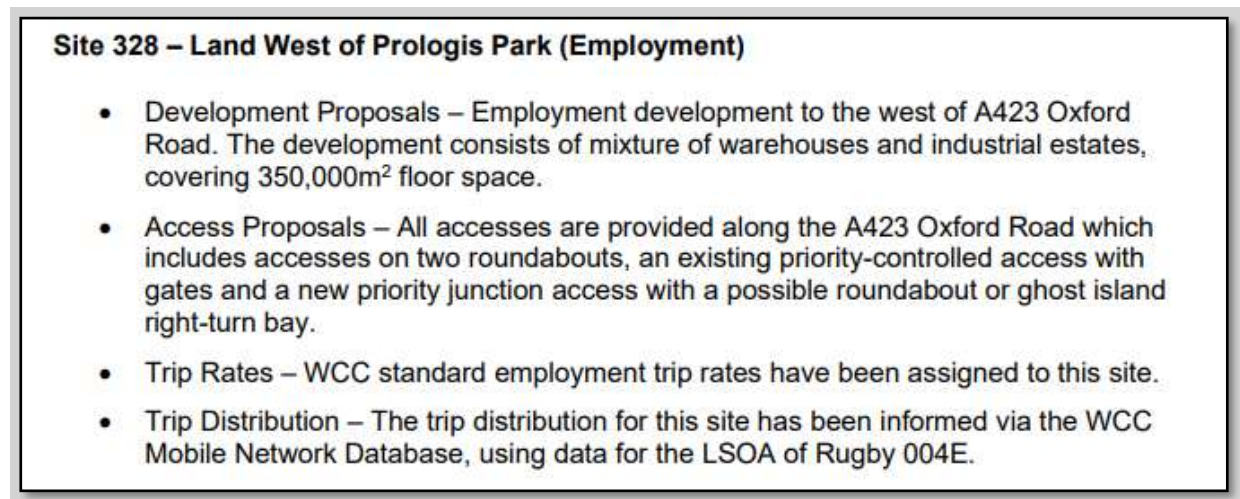


network near Ryton West have not been incorporated into the model, so the results may impact the accuracy of the modelling.

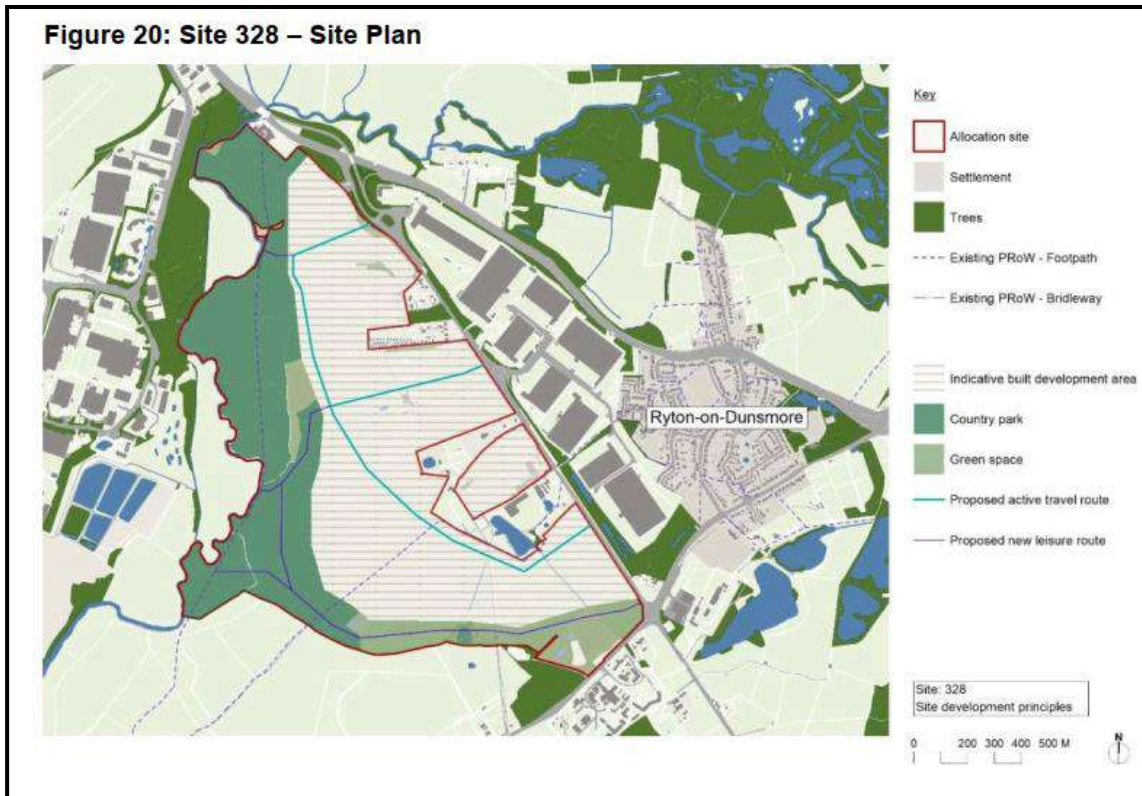
### **Site Criteria used in Modelling**

- 2.2.25. The assessment criteria and the site location used for Ryton West are outlined Figure 6 and Figure 7 below. This suggests that the strategic employment site which includes Mountpark site has been considered in the STA assessment and not Site 50 which is only Ryton West site.

**Figure 6: Appendix B - Local Plan Development Assumptions, Rugby Strategic Transport Assessment**



**Figure 7: Site Plan - Appendix B - Local Plan Development Assumptions, Rugby Strategic Transport Assessment**



- 2.2.26. STA stated in Table 2 that the Ryton West employment site of 350,000 sqm was assessed using neither model and included as core development sites.
- 2.2.27. It is noted that *“Neither” simply refers to the site not lying within either the RWA or RRAM model extent, however the trip demands are still accounted for within each model. These sites have also been subject to a separate “non modelled sites” assessment.*
- 2.2.28. Table 2 refers to most of the non-modelled sites as residential and identified only one employment site which is 328 – Ryton West referred in STA as Land West of Prologis Park. Chapter 7 of STA and Stage 7 assessed non modelled sites and refers to all residential developments and not the Ryton West employment site.

**Trip Rates Utilised in Modelling**

- 2.2.29. STA stated that in para 2.64 Warwickshire County Council have provided trip rates for the purpose of modelling. The trip generations used for the Site 328 are shown in Figure 8 and Figure 9, which is based on standard WCC trip rates, for 70% B8 and 30% B2 development at Ryton West.

**Figure 8: Light Vehicles (AM) Trip Generation Rates of Site 328 - Land West of Prologis Park**

Site Ref	Site Name	0700-0800		0800-0900		0900-1000	
		In	Out	In	Out	In	Out
328	Land West of Prologis Park (Employment)	871	240	1,027	381	647	509

**Figure 9: Light Vehicles (PM) Trip Generation Rates of Site 328 - Land West of Prologis Park**

328	Land West of Prologis Park (Employment)	482	951	332	805	242	409
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2.2.30. Trip rates have been agreed with WCC for Ryton West site and are lower than the standard WCC trip rates that were applied in the RRAM work. The lower trip generations agreed with WCC and trip generations utilised in the STA for the peak hour and 3-hour peak in the AM and PM are compared and tabulated in Figure 10 below.

**Figure 10: Trip Generation comparison – STA vs agreed WCC**

Based on a developemnt area of 350,000 sqm (to include Mountpark Site)

Light Vehicles (Cars/Vans) Only	AM				PM			
	AM Peak hr		AM 3hr Peak Period		PM Peak hr		PM 3hr Peak Period	
	0700-0800		0700-1000		1600-1700		1600-1900	
	In	Out	In	Out	In	Out	In	Out
Evidence Based Rugby STA	871	240	2545	1130	482	951	1056	2165
*Based on WSP Agreed Trip rates with NH & WCC	421	76	1029	251	71	391	395	727
Difference	↑ 450	↑ 164	↑ 1516	↑ 879	↑ 411	↑ 560	↑ 661	↑ 1438

\*The WSP agreed trip rates were derived from ATCs carried out at the access of the existing Prologis Ryton Site

2.2.31. The results show that during the AM peak hour, the STA model has 615 additional two-way trips than the agreed WCC trip generation for the Site 328, and 971 more trips in the PM peak. For the 3-hour peak period, there are 2,395 additional two-way trips in the AM and 2,100 more trips in the PM peak period. Applying the agreed trip generation would significantly reduce the volume of traffic generated from the development at A46/ Tollbar roundabout, and therefore lead to improvements in junction performance at A46/ Tollbar to those reported in the STA.

**Mode Shift Assumptions:**

2.2.32. STA stated in Para 2.57 that the application of mode shift assumptions has only been applied in the case of the RWA model, on the basis that the rural nature of the RRAM does not lend itself to a material shift away from car dependency based on the county wide strategies currently identified.

2.2.33. It is understood that whilst this is strategically true but in this particular case, as sustainable improvements were identified in support of Whitley South, Gateway South and Gigafactory development for promotion of active travel and enhancement of the public transport, the mode shift assumptions would positively influence the RRAM network near the A46/ Tollbar End junction, reducing the volume of traffic through the junction.

**Trip Distribution:**

2.2.34. The traffic assignment plots for the Ryton West are provided in Appendix B of the STA for the 3-hour AM period and PM period. These are shown below in Figure 11 and Figure 12.

Figure 11: Trip Assignment - AM Peak

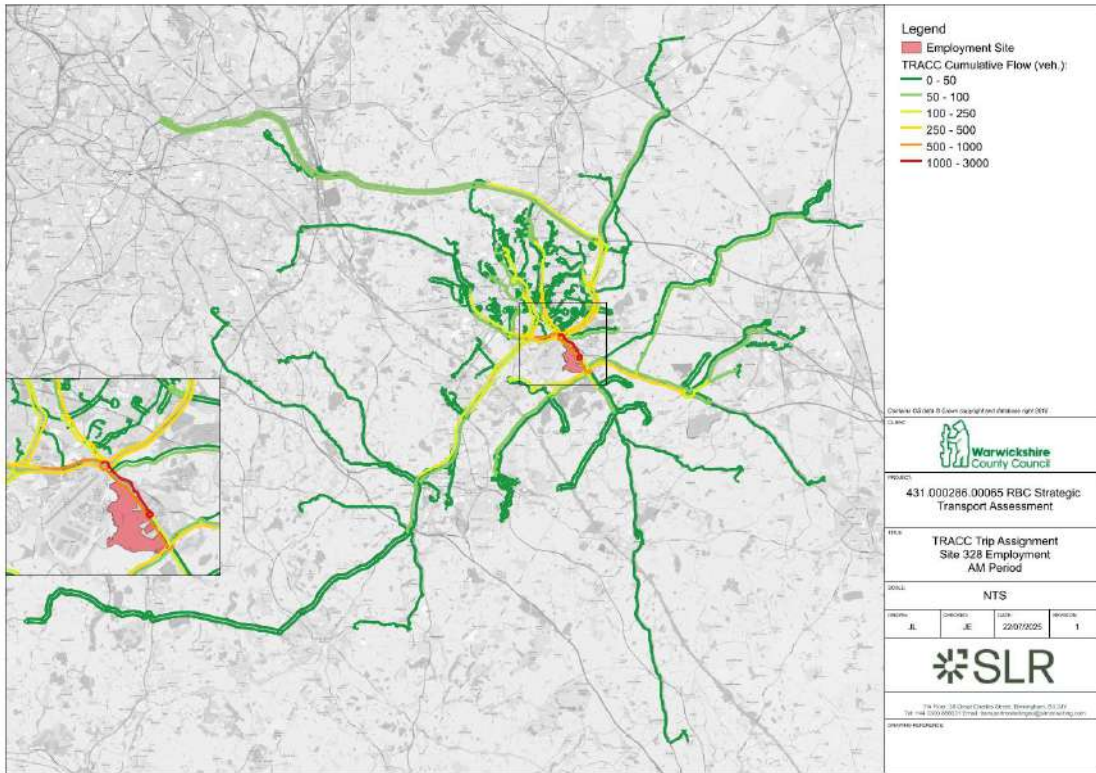
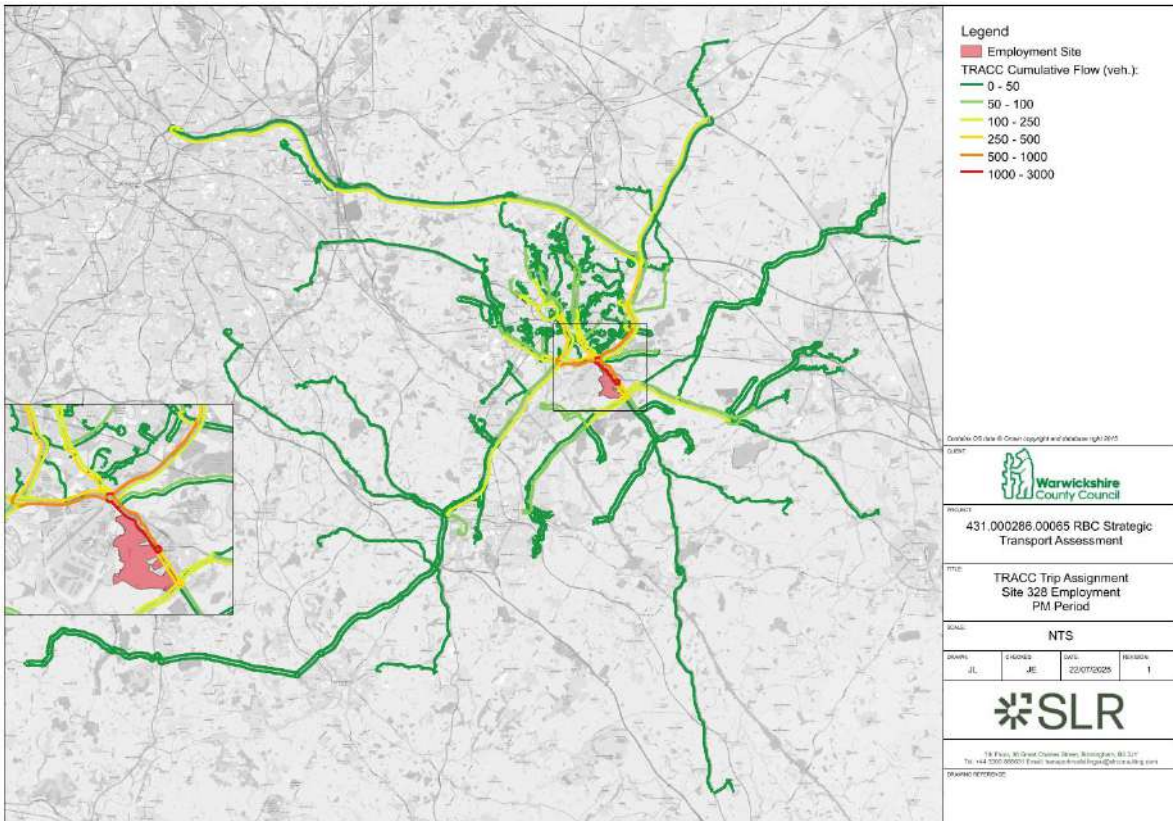


Figure 12: Trip Assignment - AM Peak



- 2.2.35. In summary, this suggest that the around 67% of trips travel towards the A46 Tollbar End junction and 33% of trips travel towards south along the Oxford Road.
- 2.2.36. At A46/ Tollbar junction, in the AM peak it appears that 34% travel towards A45 west, 16.5% travel north via London Road and 16.5% travel east via A46 Coventry eastern bypass. However, in the PM peak it appears that 16.5% travel towards A45 west, 16.5% travel north via London Road and 34% travel east via A46 Coventry eastern bypass.

**SRN Junctions – Modelling Results:**

- 2.2.37. The RRAM model results provided in the STA has been reviewed and the key observations from the 2045 Do Nothing scenario (includes Ryton and no mitigation) and 2045 Do Something scenario (includes Ryton West plus mode shift for Rugby area sites) are presented in this section.
- 2.2.38. Figure 17 and 18 of the STA provided queue impacts of the 2045 RRAM Local Plan Do Nothing Scenario relative to the 2045 Reference case. The queues presented in the Figure are in accordance with the key in the Figure not the description in Para 2.50 of the STA. However, it is understood from SLR that this was an error in the report and should be corrected to:
  - Yellow = 10-25 vehicles
  - Amber = 25-50 vehicles
  - Red = over 50 vehicles.
- 2.2.39. SLR also confirmed that the queues on the worst performing approach to the junction are reported in the STA and therefore impacts on other approaches are not reported at this stage.
- 2.2.40. In Para 4.28 of STA as shown in Figure 13, clear impacts on most of the SRN junctions is noted once the new Local Plan sites are included within the modelling including at Ryton.

**Figure 13: STA modelling – SRN Junction Impacts**

4.28 The results presented within this section identify clear impacts once the new Local Plan sites are included within the modelling. These are focused at junctions on the SRN, notably at the following locations:

- A46/A45 Toll Bar End
- A46/A428 Binley Roundabout
- M69 Junction 1
- M6 Junction 2

- 2.2.41. However, it should be noted that there are limitations and observations from both LMVR and Forecasting note of the model specifically at the A46 / Tollbar End junction. This should be considered while interpreting the results from RRAM along these SRN junctions.
- 2.2.42. The queues presented in the STA are for the worst performing arms in the morning and evening peak hours, from Figure 17, 18 and Figure 39, 40; a summary of these queues in the context of the A46 are represented in Table 1 below.

**Table 1 – Queue lengths reported in STA**

Junction	2045 Do Nothing		2045 Do Something	
	AM Peak	PM Peak	AM Peak	PM Peak
A46 / Tollbar End	50+	50+	50+	50+
A46 Binley	50+	+10 to +25	-10	+10 to +25
M6 J2	+10 to +25	+25 to +50	+10 to +25	+25 to +50

- 2.2.43. The results from the STA modelling indicate that no differences in queuing are observed at the SRN junctions between the Do Nothing and Do Something scenarios. This outcome is anticipated, as the RRAM model does not incorporate mode shift assumptions. It should be noted, however, that planned enhancements related to sustainable measures and network modifications supporting permitted developments near the Ryton West are expected to influence both the modelling outputs and the performance of the A46/ Tollbar junction. There is no evidence of the effects of the cumulative development with Ryton West and Walsgrave Hill presented in the STA.
- 2.2.44. The STA identifies that optimising traffic signals at A46/ Tollbar roundabout improves junction performance but does not change the overall conclusions (i.e. the increase in queues continues to be higher than 50 vehicles). Once the traffic is reassigned on the surrounding network and the total volume of traffic at the junction is corrected, then the benefit of signal optimisation at the A46/ Tollbar junction is likely to be more effective in reducing queues and delays.

## 2.3 SUMMARY

- 2.3.1. In summary, the observations from the modelling suggest that:
- The RRAM LMVR (prepared for WCC) suggests that the validation at A46/ Tollbar junction, due to the junction location in the periphery of the model and the results interpreted, should be considered carefully
  - The forecasting note suggests that the network changes associated with committed infrastructure are not coded in the model but the committed development traffic is included
  - If KSWA model and CASM has been updated to include local infrastructure, and these should have been used to assess the impact of the Ryton West rather than the RRAM model
  - The traffic generation used for Ryton West in the modelling in the STA is approximately double the trip generation agreed with National Highways through pre-application discussions
  - The mode shift assumptions are not included in the RRAM and these will have influence on the operation of the network in the vicinity of the Ryton West, and
  - Improvements are made at other junctions on the network to reflect committed investment to transport infrastructure, but not at A46/ Tollbar roundabout.
- 2.3.2. Whilst the modelling for the STA has followed normal process, there are anomalies in the detail resulting from the omission of network changes and assumptions regarding mode shifts in the Ryton area will influence the accuracy of the study's findings.



- 2.3.3. It may also be more appropriate for the Ryton West to be assessed using the Kenilworth and Stoneleigh Wide Area (KSWA) model, to provide a more accurate representation of development-related traffic impacts on the strategic road network, particularly in the vicinity of the A46/ Tollbar End junction. This would ensure that the actual operational effects are fully understood before any conclusions are drawn regarding the site's suitability in support of the Local Plan allocation.
- 2.3.4. The cumulative elements of this significantly increases the volume of traffic at A46/ Tollbar roundabout, which increases the queuing and delays in the STA modelling, and hence needs to be revisited and addressed.

### 3 PREVIOUS EVIDENCE AND CONSULTEE RESPONSES

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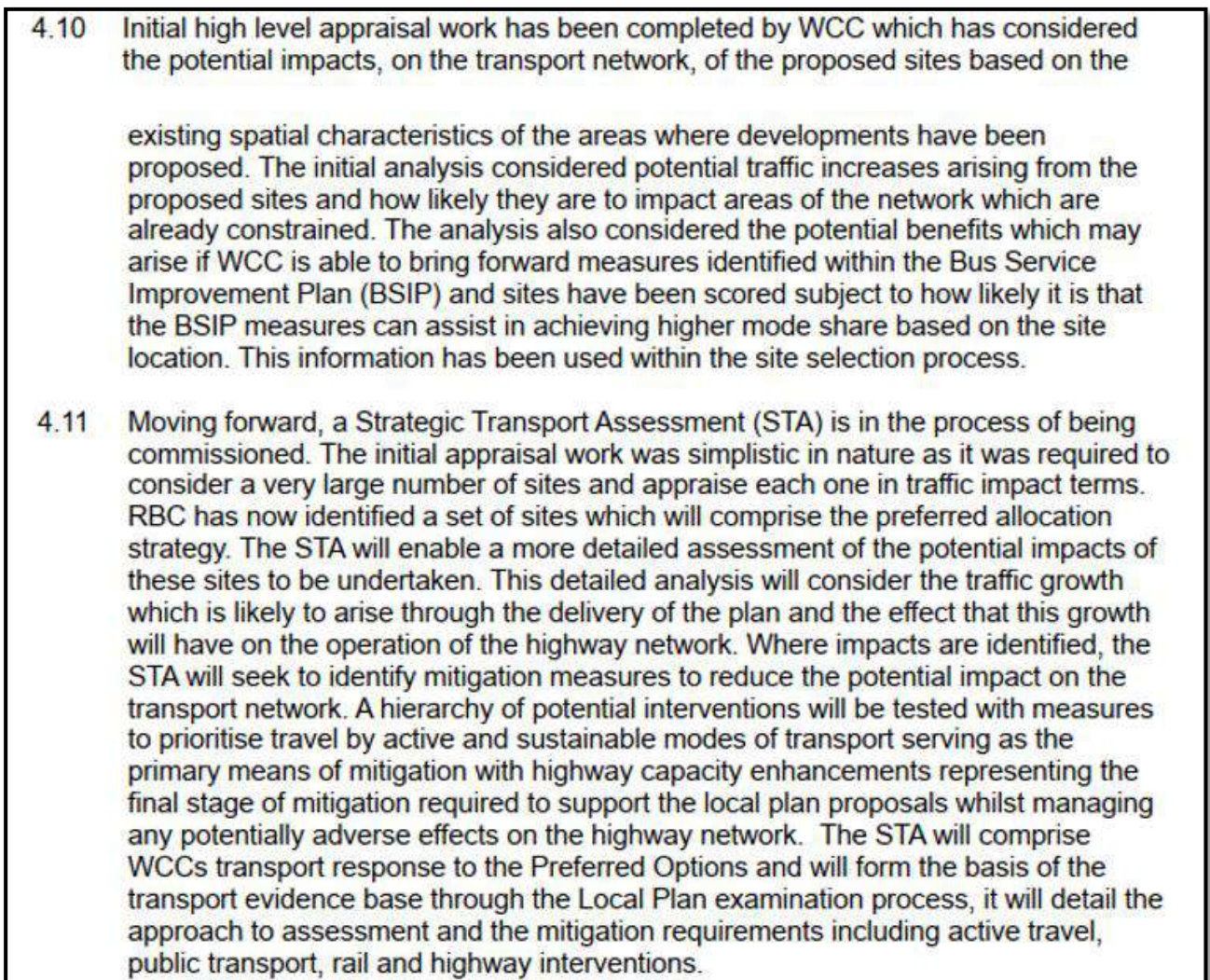
#### 3.1 OVERVIEW

3.1.1. This section summarises the responses from Highway Authorities and Councils to the Rugby Borough Council Local Plan Consultation, specifically regarding their perspective on the Land west of Prologis Park referred as Ryton West in rest of the report.

#### 3.2 WARWICKSHIRE COUNTY COUNCIL

3.2.1. WCC has previously responded to Rugby Borough Council Local Plan Consultation in April 2025. The key response in consideration to the transport network areas stated in Para 4.10 and 4.11 of the response as represented in **Figure 14**.

**Figure 14: WCC Response to Rugby Borough Council Local Plan Consultation (Apr 2025)**



3.2.2. From Para 4.10, the high-level appraisal work included accessibility scoring of all sites for the site selection process. For the purpose of this analysis SLR have been commissioned by Warwickshire County Council (WCC) and Rugby Borough Council (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 (LP) 'Call for Sites' process. RBC LP Initial Site Analysis Transport Network Analysis Methodology note dated February 2025 was uploaded in support of the Local Plan review – Preferred Option public consultation: evidence base.

- 3.2.3. The objective of this exercise is to undertake an initial appraisal of the proposed site locations to aid RBC in identifying any sites, proposed to date, which may be constrained by existing transport choice and highway capacity issues prior to them being considered for allocation within the Plan. This has been completed by identifying:
- The existing levels of accessibility to different modes of transport across the study area alongside the development locations;
  - How this accessibility may be improved by measures WCC has already identified through the Bus Service Improvement Plan (BSIP); and
  - Congestion hot spots on the existing highway network alongside the proposed areas for development.

### **ACCESSIBILITY SCORING**

- 3.2.4. Accessibility work of the potential Rugby Local Plan sites was completed on behalf of WCC in December 2024. This has been undertaken in three stages.
- Stage 1 – Existing Multi-Modal Accessibility Analysis.
  - Stage 2 – Potential Public Transport Improvement Accessibility Analysis.
  - Stage 3 – Highway Congestion Review.
- 3.2.5. 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.
- 3.2.6. An assessment of existing accessibility conditions and those predicted to result from the inclusion of BSIP measures was undertaken using Mobile Network Data (MND) and TRACC travel time analysis software. The output of this stage of the study consists of a data table which presents the 124 Local Plan sites ranked by accessibility which has been measured by MSOA and LSOA level area coverage of O-D Bus travel time contour and PTAL scores.
- 3.2.7. The assessment results for Stage 1 and 2 are provided within the Baseline Data Tables and Baseline vs Bus Service Improvement Plan (BSIP) Measures Data Tables Spreadsheets. The scores are summarised at MSOA and LSOA level and further disaggregated to site level. A summary overview of the assessment, outlining the areas with highest accessibility scores and ranking, and how these change with BSIP inclusion has been detailed in this accessibility work.
- 3.2.8. For the purpose of this report, observations for the two site references are provided below.
- Site 50 – Prologis Park Ryton West, Ryton on Dunsmore; and
  - Site 328 – Strategic – Land west of Prologis Park (Employment) – (Includes both Site 50 - Prologis Park Ryton West site and also Site 61 - Mountpark, Ryton, Ryton on Dunsmore).
- 3.2.9. The 'Initial Site Analysis – Baseline Data Tables' indicate that both sites in Ryton received scores of 11 for Mobile Network Data (MND) analysis, 15 for Public Transport Accessibility Level (PTAL) analysis, and 6 for Bus Origin/Destination (OD) Accessibility analysis. However, Site 50 achieves a score of 32 and a rank of 35 and Site 328 achieves a score of 32 and a rank of 47 as shown in Figure 15.



**Figure 15: Overview - Baseline Data Tables (Feb 2025)**

Reference	Site Name	msoa_name	lsoa_name	MND Analysis	PTAL Analysis	Accessibility Analysis	Score	Rank
50	Prologis Park Ryton West, Ryton on Dunsmore	Ruoby 004	Rugby 004E	11	15	6	32	35
328	STRATEGIC - Land West of Prologis Park (Employment)	Rugby 004	Rugby 004E	11	15	6	32	47

3.2.10. For the assessment of the Stage 2 results, it is unclear what BSIP measures have been included in the model. However, reviewing the BSIP sets out by Warwickshire County Councils, in the vicinity of the Ryton West, no measures have been identified which would likely to enhance the accessibility of the site via bus services. This is also reflected in the score and ranking of the site from the analysis as shown below.

3.2.11. The 'Initial Site Analysis – Baseline vs BSIP Measures Data Tables' show that the Site 50 received a score of 52 and Site 328 received a score of 62 in both the baseline and with BSIP measures scenarios as shown in Figure 16. This suggests as specified above both Ryton Wests are scored the same in baseline and BSIP scenario, and would likely be improved when including the committed transport improvements in this area.

**Figure 16: Overview comparison – Baseline v BSIP Rank (Feb 2025)**

Site Ref	Site	Baseline Rank	BSIP Rank
50	Prologis Park Ryton West, Ryton on Dunsmore	52	52
328	STRATEGIC - Land West of Prologis Park (Employment)	62	62

**NETWORK CAPACITY IMPACTS**

3.2.12. Network capacity work of the Local Plan sites was also completed on behalf of WCC in December 2024; comparing the impact and highway network performance of the draft allocations listed in the Regulation 18 version of the Local Plan. The results for the two Ryton West sites are shown in Figures 17 and 18.

**Figure 17: Cover Sheet - Transport network analysis - site ranking by congestion level**

Job Title:

Job Number:

Model Name:

Model Years:

Model Location:

Date:

**KEY:**

Least Congested  Most Congested

6      5      4      3      2      1

Example Buffer Areas (Applied by Site Type):

**Figure 18: All Site Speed Analysis - Transport network analysis - site ranking by congestion level**

Site Ref.	Site Type	Site Name	Free Flow Speed (km/h) at 0500	Free Flow Speed (km/h) at 0800	Free Flow Speed (km/h) at 1700	AM Peak Speed Ratio	PM Peak Speed Ratio	Average Speed Ratio	Category
50	Edge of Town	Prologis Park Ryton West, Ryton on Dunsmore	44	37	40	85.4%	91.3%	83.4%	6
328	Edge of Town	STRATEGIC - Land West of Prologis Park (Employment)	43	33	38	78.2%	88.8%	82.0%	6

3.2.13. Both sites in Ryton fall under the edge-of-town congestion analysis are ranked in category 6, indicating that the site experiences minimal congestion at Regulation 18 stage, and now the WCC

evidence contradicts this. Section 5.3 of the WCC response refers to the details of the proposed site allocation for the Ryton West as shown in Figure 19.

**Figure 19: Rugby Borough Council Local Plan Consultation (Apr 2025) - Warwickshire County Council Response**

Employment Allocation	Allocation	Additional comments/text to include with development requirements.
Prologis Park West and Mountpark, Ryton-on-Dunsmore	circa 350,000m2 floorspace employment	<p><b>Active Travel</b></p> <ul style="list-style-type: none"> <li>• Pedestrian and cycle permeability through the site</li> <li>• Contributions may be required towards cycle route network improvements identified as part of the Coventry Transport Strategy and Warwickshire Local Cycling and Walking Infrastructure Plan (LCWIP) including Cy03 (A45 Tollbar End) and Cy04 (A423 Oxford Road between Tollbar End and Ryton)</li> </ul>

3.2.14. This suggests that if the proposed Ryton West is included in the Local Plan, measures to encourage active travel should be considered, and developer contributions toward improvements to the cycle route network may be expected.

### 3.3 NATIONAL HIGHWAYS

3.3.1. National Highways has responded to Rugby Borough Councils Local Plan Issues and Options Consultation in February 2024 and Rugby Borough Local Plan – Preferred Options Consultation in May 2025. In the context of the Ryton West from transport perspective are detailed below.

#### FEBRUARY 2024 LETTER

3.3.2. NH’s consultation response to the Local Plan letter in February 2024 refers to Prologis Park Ryton Expansion site, that it is located near to A46 Tollbar End junction which was subject to an improvement scheme in March 2017. The most recent information published in December 2023 study concludes that for customers using the new underpass link at A46/ Tollbar End, journey times and reliability improved. However, it was found that for customers travelling through the Tollbar End roundabout, journey times and reliability deteriorated in some movements. It is likely that the increased journey times are a result of traffic flow increases for certain movements at Tollbar End (A45 west to A45 south traffic increased by 45%, 4,000 vehicles), despite observed flows around the project being below forecast flows. The report also noted an overall net benefit on congestion in the study area, driven by savings from the new underpass link at Tollbar End.

*Note: For information, the Feb 2024 letter referenced A46 Toll Bar End year after report; this used data from 2018, even though the report is dated December 2023.*

3.3.3. The relevant extract from the letter is shown in Figure 20.

**Figure 20: Prologis Park Ryton Expansion - Rugby Borough Council Local Plan Issues and Options Consultation – National Highways Response (Feb 2024)**

Prologis Park Ryton Expansion  
 The site is near to the A46 Tollbar End junction, subject to an improvement which was completed in March 2017. The junction improvement included grade separation with a new underpass to avoid the Tollbar End roundabout and an additional lane on the A45 Stonebridge Highway. Prior to improvement, the junction was operating above design capacity for several years, suffering queues and delays in peak periods. The most recent information available regarding the current operation and capacity of the junction was sourced from the One-Year After POPE study for A46 Tollbar End (published in December 2023).  
 The study concludes that for customers using the new underpass link at Tollbar End, journey times and reliability improved. However, it was found that for customers travelling through the Tollbar End roundabout, journey times and reliability deteriorated in some movements. It is likely that the increased journey times are a result of traffic flow increases for certain movements at Tollbar End (A45 west to A45 south traffic increased by 45%, 4,000 vehicles), despite observed flows around the project being below forecast flows. The report also noted an overall net benefit on congestion in the study area, driven by savings from the new underpass link at Tollbar End.

- 3.3.4. This letter also infers that there could be capacity issues at M6 J2, and that analysis was needed to explore mitigation. Under the A46 Walsgrave junction comments it also indicates that the queues at M6 J2 could be exacerbated with the Walsgrave junction improvements (as the improvements would remove current congestion that delays traffic getting to J2). The relevant extract is shown in Figure 21.

**Figure 21: A46 Walsgrave Junction - Rugby Borough Council Local Plan Issues and Options Consultation – National Highways Response (Feb 2024)**

A46 Walsgrave Junction  
 Following on from the above, the A46 in Coventry has benefitted from a series of junction improvements designed to unlock congestion pinch points along the A46 Coventry Eastern Bypass. Mostly recently the A46 Coventry Junctions upgrade saw the completion of the A46 Binley junction improvement in February 2023. The A46 Walsgrave junction is the last remaining at grade junction on this corridor, creating a congestion pinch point due to increased pressure by traffic released as a result of Binley and other A46 junction improvements.  
 Junction improvements at Walsgrave have been designed to relieve traffic congestion, improve journey times and increase capacity on the A46, with work currently forecast to commence in Winter/Autumn 2026. It should be noted that implementing a free-flow arrangement at Walsgrave as planned could have significant implication on the operation of M6 J2 in the north, as a free flow arrangement is likely to release current congestion at Walsgrave junction onto M6 Junction 2.

- 3.3.5. The Strategic Transport Assessment (STA) (prepared in October 2025) states the following which is relevant in this context is shown in Figure 22:

**Figure 22: Traffic Modelling Analysis and Overview - Rugby Strategic Transport Assessment**

- |      |  |
|------|--|
| 2.30 | During the recent assessment of the European HQ for the Fraser Group, NH and CCC raised concerns with regards the RRAM model. In part these related to the fact that the RRAM model had been developed before the Binley Woods junction improvements were in place (and so did not match observed conditions).                               |
| 2.31 | These issues have not been fully resolved, this should be recognised as a risk with regards engagement with NH around the assessment of impacts using the RRAM, specifically when considering the area of network to the East of Coventry. Supplementary analysis is being undertaken alongside this STA report, to help manage these risks. |

- 3.3.6. It should be noted that concerns have been raised by NH and CCC with regard to Rugby Rural Area Model (RRAM) specifically on some part of the network.
- 3.3.7. However, based on our subsequent discussions with SLR, it is understood that the modelling work undertaken in support of the STA have included both completed schemes at A46 Binley and A46 Walsgrave and also mitigation scheme at M6 J2, notwithstanding that NH were not involved in this modelling.

#### **MAY 2025 LETTER**

- 3.3.8. In the key sites of interest section, the letter outlines the detailed assessments required, and transport modelling, infrastructure phasing and freight routing strategies and any associated mitigation must be developed in close collaboration with NH which is typical. The relevant extracts from the letter, where NH identify the areas that they would expect more detail to be provided on, are shown in Figure 23.

**Figure 23: Key Sites of Interest: Rugby Borough Local Plan – Preferred Options Consultation – National Highways Response (May 2025)**

**Key Sites of Interest**  
National Highways is particularly concerned with:

- Residential sites proposing 100 dwellings or more; and
- Any development site that directly borders or accesses the SRN.

We have identified several allocations within the Local Plan that are either of a significant scale or located close to key SRN junctions. These are summarised in the table below:

Ref	Site Name	Dwellings / Employment Floorspace	Likely SRN Junction Affected
96	Land at Coventry Road, Wolvey	500	M69 J1
334	Land off Barby Lane, Hillmorton	380	A5 Halfway House
316	Land at Long Lawford	400	A45 – A4071 – B4453
59	Newton Manor Lane, Brownsover	240	M6 J1
338	Land south of Crick Road, Houlton	250	A5 Halfway House
134	Land north of Plott Lane, Stretton	125	A45 School Lane
40	East of Kilsby Lane, Hillmorton	125	A5 Halfway House
341	Land south of Coventry Road, Dunchurch	180	M45 J1
328	Prologis Park West and Mountpark	350,000 m <sup>2</sup>	A46 Tollbar / Ryton Island
95	Crowner Fields Farm, Ansty	275,000 m <sup>2</sup>	M6 J2 (Ansty Interchange)
17	South West Rugby Employment Phase 2	130,000 m <sup>2</sup>	A45 – A4071 – B4453

We expect that each of these sites is supported by detailed, site-specific transport assessments prepared in accordance with DfT Circular 01/2022. These assessments should address both direct and cumulative impacts on the SRN and identify necessary mitigation measures.

In the case of the employment sites, we would expect comprehensive transport modelling and clearly phased infrastructure proposals. Freight routing strategies and any associated highway mitigation must be developed in close collaboration with National Highways. We welcome early and proactive engagement as these sites are brought forward.

3.3.9. More detail is added for the requirements of the STA, noting that agreed assumptions on trip generation and distribution should be used, as well as detailed junction modelling at key SRN junctions completed with NH involvement. NH comments are valid and agree that a robust assessment is required to understand the cumulative impact of the proposed site allocations. The relevant extract is shown in Figure 24.

**Figure 24: Strategic Transport Assessment and Cumulative Impact: Rugby Borough Local Plan – Preferred Options Consultation – National Highways Response (May 2025)**

**Strategic Transport Assessment and Cumulative Impact**  
 National Highways reiterates the importance of assessing the cumulative traffic impacts of all proposed site allocations through a Strategic Transport Assessment (STA). Site-by-site assessments alone are unlikely to reflect the full extent of pressure on the SRN, and therefore risk underestimating the overall impact.

We encourage Rugby Borough Council to agree a clear and robust assessment methodology in collaboration with National Highways and Warwickshire County Council. This should be developed through joint technical work and include:

- Agreed assumptions on trip generation and distribution.
- Detailed junction modelling at key SRN locations.
- The identification of appropriate mitigation measures and associated funding mechanisms.

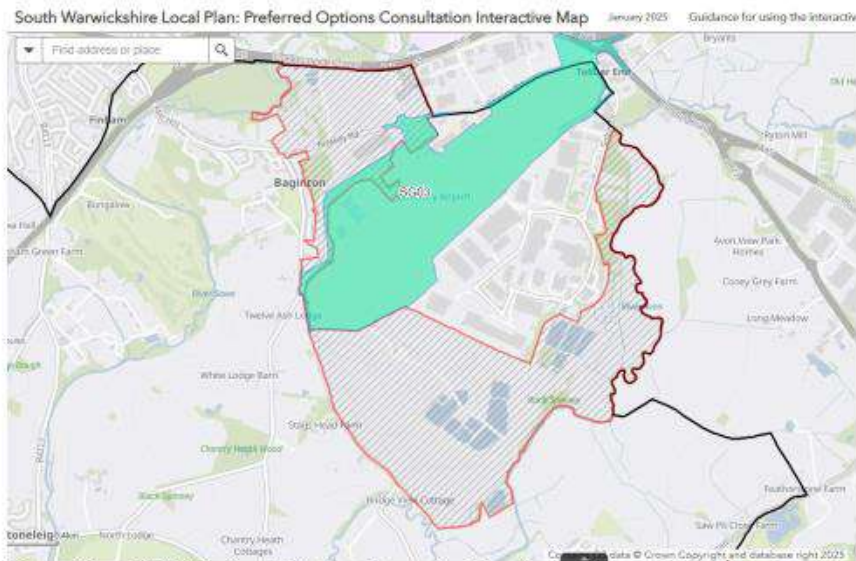
- 3.3.10. It is noted in the letter that greater details are requested such as further detail on the phasing of development, associated infrastructure and anticipated delivery timelines associated with the South-West Rugby Allocation than any other site.
- 3.3.11. In subsequent conversation with NH this year, they have confirmed that they have no objection in principle to proposed development at Ryton In this discussion, NH also advised that it is not in their remit to recommend which sites get allocated, but to provide guidance and advice on how the Local Plan may affect their network.

### **3.4 WARWICK DISTRICT COUNCIL & STRATFORD-ON-AVON DISTRICT COUNCIL**

- 3.4.1. South Warwickshire Councils (Warwick District Council and Stratford-on-Avon District Council) have responded to Rugby Local Plan – Preferred Options Consultation in May 2025. In the context of the Ryton West from transport perspective their responses are detailed below.
- 3.4.2. The letter refers to Site 328 lies adjacent to the administrative boundary with Warwick District Council and requested clarification on the mix of the employment uses to be delivered across whole of the site. The letter also refers to potential strategic employment growth and major investment site on land at Coventry airport (Gigafactory site) and stated that if both sites are brought forward as strategic allocations, then there is a need for strategic cross boundary discussions. It also refers to capacity impact on the local and strategic highway network (namely the A46 and A45) including both direct and cumulative impacts, and an active travel and public transport strategy to improve access to the sites from likely employee base in Coventry and its surrounds. The relevant extract from the letter is shown in Figure 25.

**Figure 25: Proposed Employment Allocation: Prologis Park West, Ryton-on-Dunsmore : Rugby Local Plan Preferred Option (Regulation 18) Consultation (Mar 2025) — Response from the South Warwickshire Councils (Stratford on-Avon District Council and Warwick District Council) May 2025**

RBC will be aware that land at Coventry Airport (to the west of the proposed Prologis West allocation) was included in the 2025 SWLP Preferred Options as a potential location for strategic employment growth and major investment site (SG03: Coventry Airport Group / MIS.4 South of Coventry Area). If taken forward in the SWLP, this Strategic Employment Site would build upon the existing 'Coventry Gateway' allocation DS16 in the adopted Warwick District Local Plan, which allocates 235ha of land in the vicinity of Coventry Airport as a major employment site of sub-regional significance.



*Extract from SWLP Preferred Options Interactive Map (green denotes SG03 Coventry Airport and the red outline and black hatching indicates existing Warwick District Local Plan allocation DS16)*

There is therefore a need for strategic cross-boundary discussions to develop a collaborative approach if both sites are to be brought forward as strategic employment allocations. Firstly, to ensure that the market is capable of delivering both sites as part of a significant sub-regional offer and as referred to above, to ensure that the specific employment mix on each site complements rather than competes with each other. Additionally, specific regard needs to be had to the cumulative impact the sites will likely have on infrastructure in the South Coventry area if they are both to move forwards in their respective Local Plans. Discussions will need to cover issues including utilities provision and capacity, impact on the local and strategic highway network (namely the A46 and A45) including modelling both direct and cumulative impacts, and an active travel and public transport strategy to improve access to the sites from the likely employee base in Coventry and its surrounds. The South Warwickshire Councils anticipate that Warwickshire County Council and National Highways (as manager of the Strategic Road Network) will need to play a pivotal role in such discussions.

If this site is taken forward as a preferred allocation, there should be a policy requirement specifying delivery of a suitable bridge (accommodating active travel modes) from the proposed country park into the adjacent country park to the west (being delivered by SEGRO – WDC planning application W/21/1655). This can help deliver more comprehensive and connected areas of country park for local communities and delivery off-road active travel routes between Baginton and Ryton-on-Dunsmore and on through to Ryton Pools Country Park.

## 4 ACTIVE AND SUSTAINABLE TRAVEL

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### 4.1 SUSTAINABLE TRANSPORT STRATEGY

- 4.1.1. The accessibility scoring from WCC in their Reg 18 analysis recognised the sustainable transport credentials of the site, notwithstanding that it did not reflect the sustainable transport strategy that has been prepared for Ryton.
- 4.1.2. A sustainable transport strategy has been prepared for Ryton and submitted in support of the Local Plan evidence, which outlines a number of measures to improve the accessibility of the site. This will benefit future employees and visitors of the planned expansion of Prologis Park Ryton, as well as existing employees at the current site. The conclusions of the sustainable transport strategy are outlined below.
- 4.1.3. Prologis Park Ryton West benefits from excellent links to the strategic road network in the UK. The site is in an optimal strategic location for manufacturing, distribution and warehousing, being immediately adjacent to the A45, A46 and A423 corridors, whilst also falling within the much coveted “Golden Triangle of Logistics” across the Midlands region. The success of Prologis’ existing site, Prologis Park Ryton, results from its geographical position within the centre of Britain and access to strategic road communications in the form of the M1, M6, M40, M42 and M69 corridors. The site location relative to key national road networks ensures that occupiers can respond to demand efficiently and quickly to move goods across the wider UK.
- 4.1.4. The Prologis Park Ryton West site is ideally located relative its position adjacent to Prologis Park Ryton to promote and achieve a high level of sustainable travel to the future development. A dedicated public transport strategy, which includes the provision of a new high-quality public transport hub within the site and extended bus services for employees to provide connections with surrounding residential areas including Coventry. An internal electric shuttle bus could also be delivered. The Prologis Park Ryton West development will be capable of further strengthening/ supporting existing infrastructure and initiatives for the benefit of all users across the wider Prologis Park Ryton West.
- 4.1.5. The development will build on the sustainability achieved at the existing site, with the principles of sustainable development at the core of any proposals. These underlying values and desire to embed sustainability at the heart of the proposal, will ensure that the Prologis Park Ryton West site will result in delivery of a functional and sustainable development.
- 4.1.6. The site offers great potential to deliver a high-quality internal layout with shared footway/cycleway routes through the parcel of land to maximise the likelihood of linkages to existing facilities being adopted by occupiers and thus assist the Local Authority to achieve truly sustainable development within Rugby Borough. This includes additional opportunities to facilitate boundary connections with the neighbouring Mountpark site. Prologis Park Ryton West creating active travel synergies through co-ordinated master-planning and sensitive delivery.
- 4.1.7. The employment zone nature of this part of Warwickshire forms part of the Coventry North & South Corridor (Number 11), which is part of the Transport for West Midlands (TfWM) Key Route Network and will be a focus for future investment, making Prologis Park Ryton West site ideal to harness the potential to deliver a truly sustainable development. A development of this nature would benefit the wider West Midlands considering its proximity to the Coventry & Warwick Gigapark Investment Zone and the London Road Corridor linking to Coventry and its rail station.

- 4.1.8. The report concluded that the Prologis Park Ryton West site can continue to be supported in the Rugby Local Plan with any future development delivering the potential to complement/ enhance surrounding assets and ensure that the necessary infrastructure is in place to encourage active travel and public transport to/from the adjoining Prologis Park Ryton and nearby employment sites.
- 4.1.9. Furthermore, it is also clear that the Prologis Park Ryton West site would also support principles set out within the NPPF, with regards to delivering a 'vision-led' approach to transport planning, thus supporting development that promotes infrastructure intended to prioritise sustainable travel modes such as walking, cycling and public transport. The proposal associated with Prologis Park Ryton West site will create a high-quality environment that reduces dependence on private vehicles, whilst supporting long-term sustainability objectives of the Local Authority.
- 4.1.10. In relation to Paragraph 110 of the NPPF, it is evident that continuing to support the Prologis Park Ryton West site will allow the Local Authority to actively manage a pattern of growth which supports sustainability objectives. The development will be focused on an area of Ryton-on-Dunsmore that has a good base level of accessibility and can be made even more sustainable through limiting the need to travel and offering a genuine choice of transport modes. This will assist in reducing congestion/emissions experienced at A46 / Tollbar End roundabout as a result of the development, whilst improving air quality and public health for locals.
- 4.1.11. In relation to Paragraph 115 of the NPPF, it is evident that continuing to support the Prologis Park Ryton West site will allow the Local Authority to support a future development that will prioritise sustainable transport modes, deliver safe and suitable access to the site for all users and provides high-quality design which accords with national guidance.
- 4.1.12. In accordance with the NPPF, therefore, the Prologis Park Ryton West site is appropriate for allocation on highway grounds, as the high level of potential to realise active travel and public transport improvements through the scheme will assist in achieving a truly sustainable development at the Prologis Park Ryton West site, whilst also enhancing the accessibility of existing operations at Prologis Park Ryton on the adjacent parcel of land and create synergies with the similarly promoted Mountpark Ryton employment site.

## **4.2 FURTHER IMPROVEMENTS TO ACTIVE AND SUSTAINABLE TRANSPORT**

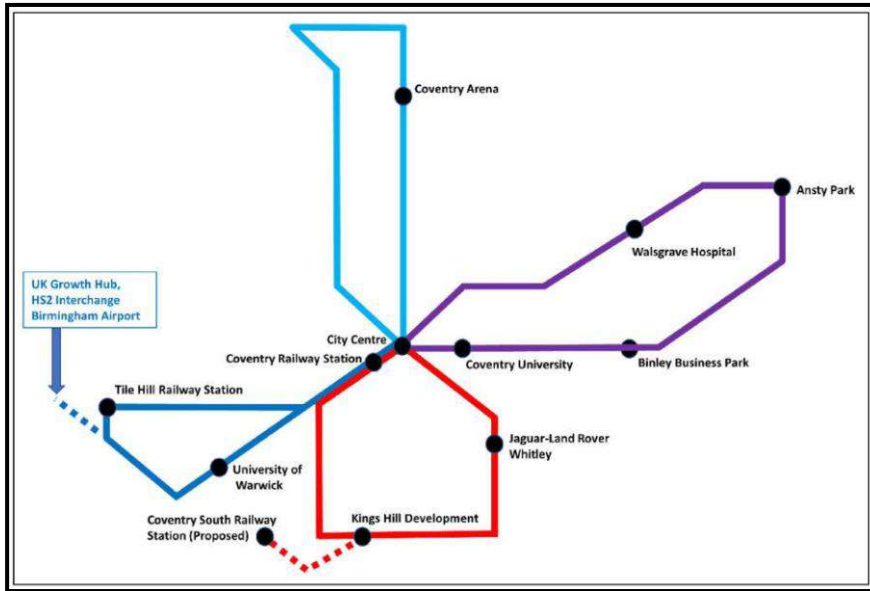
- 4.2.1. This section details various investments in active and sustainable transport around south Coventry and the western edge of Warwick, including projects like the Coventry Very Light Rail scheme and initiatives supporting committed developments such as Whitley South, Gateway South, and Coventry Gigafactory near the Ryton West.
- 4.2.2. This section also provides details of potential schemes near Ryton from the review of the Warwickshire Local Cycling and Walking Infrastructure Plan (LCWIP) and Coventry LCWIP and assess how these will enhance sustainable access to the site.

### **COVENTRY VERY LIGHT RAIL**

- 4.2.3. The Coventry Very Light Rail (CVLR) forms part of the wider Regional Very Light Rail Programme, alongside the Dudley VLR scheme and the Mass Transit Appraisal Study. The CVLR aims to create an affordable, low-disruption, battery-powered light rail system for Coventry and other medium-sized cities. The long-term vision of CVLR includes four circular routes spanning the city, connecting to

Coventry Airport/Gigafactory, University Hospital Coventry and Warwickshire (UCHW), Ansty Park, University of Warwick as shown in Figure 26.

**Figure 26: Coventry VLR Route Map (My Rail Engineer – Issue 184)**



4.2.4. The current status of the CVLR scheme is Phase A – Greyfriars Road to Queen Victoria Road, 220m demonstrator route is constructed and delivered as on-road test route. Phase B – Railway station to Coventry University Technology Park (Mile Lane) – 800m twin track is currently approved and construction is expected to be completed by March 2027. The broader network expansion is dependent on funding and trials. However, from the article, it appears that the airport route likely to now be prioritised and targeted for 2029-2030 subject to funding.

4.2.5. If brought forward, the future expansion of the CVLR network would offer an additional enhancement to sustainable travel opportunities in the wider area. While the sustainability of Prologis Park Ryton West is fully demonstrated through the standalone sustainable transport strategy already developed for the site, the CVLR has the potential to further reinforce these credentials. In particular, the network could facilitate future shuttle-bus connections between the site and the CVLR, should this be considered appropriate. Such provision would represent an optional enhancement rather than a requirement and may be explored in the context of future site’s comprehensive sustainable transport strategy.

4.2.6. It should be noted that incorporating the improvements mentioned below from Whitley South, Gateway South and Coventry Giga Factory as shown in Figure 27 into the assessment of the TRAAC software may result in a higher accessibility score for the Ryton West, potentially improving its ranking.

**WHITLEY SOUTH**

4.2.7. The enhancements and related contributions from the Whitley South development near the site are expected to impact the operation of the sustainable transport network. Of relevance, are

- Off-site Highway Contribution
  - £500k for offsite highway improvements
- Active travel improvements
  - £150k for City cycling / walking works fund

- £150k for County cycling / walking fund
- Public transport infrastructure strategy
  - £900k for new bus services, bus shelters and bus priority measures.

## **GATEWAY SOUTH**

4.2.8. Similarly, related contributions from the Gateway South are detailed below from sustainable transport perspective.

- Active travel improvements
  - £500k for pedestrian and cycle improvements
- Public transport contributions
  - £800k for bus services
  - £10k for bus shelters and travel plan contributions
  - £1.1m for Direct works Service Bus Contribution.

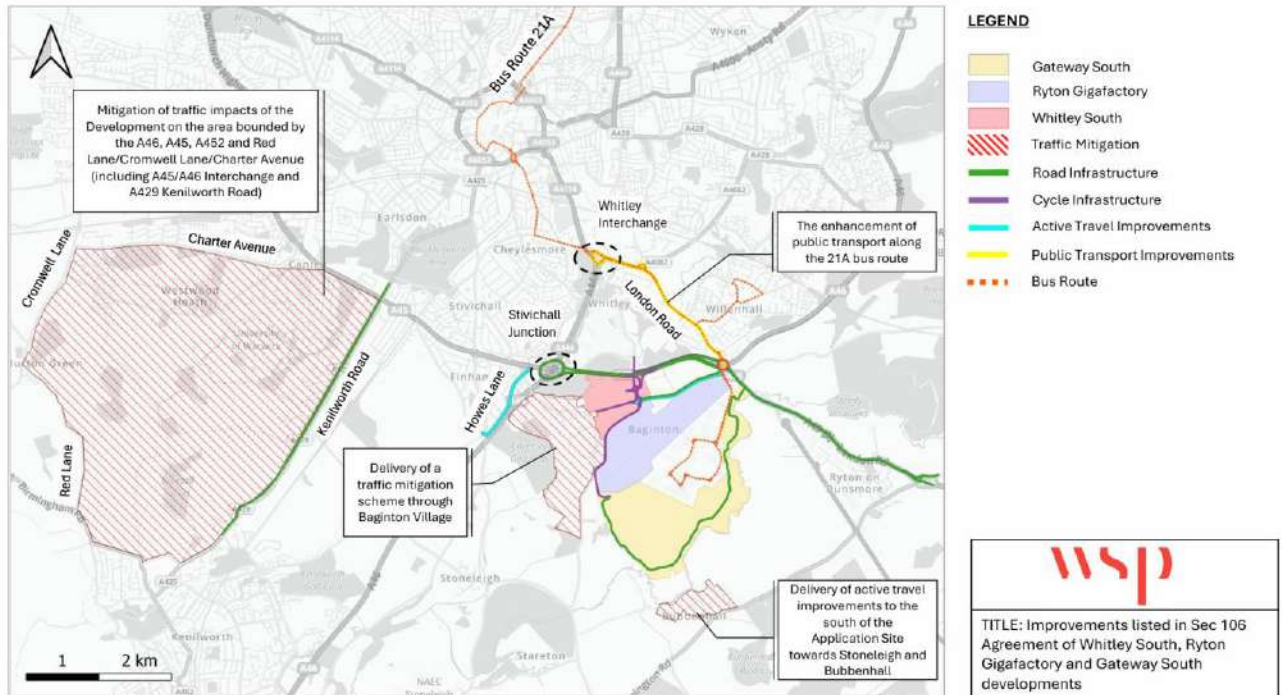
## **COVENTRY GIGAFACTORY**

4.2.9. Also, improvements associated with Coventry Gigafactory at Baginton Airport are detailed below:

- Junction improvements
  - £1.3m for London Road improvements
  - £1.517m for improvements between A46, A45, A452 and Red Lane, including the A45/ A46 interchange
- Active travel improvements
  - £400k for the A45
  - £540k e-bike hire scheme for Coventry
  - £480k for Howes Lane / Kings Hill
  - £320k for A45/ A46/ A444 improvements
- Public transport improvements
  - £900k for the 21A route
  - £300k for east-west bus improvements (Coventry)
  - £440k for bus services in Warwickshire – to fund bus services
  - £350k for bus services in Warwickshire – to make up any shortfall between actual and anticipated revenue bus base contributions.

4.2.10. As noted earlier in the STA Review, these committed improvements for active travel, public transport and junction capacity improvements in and around the A45/ A46 Tollbar junction were not included in the STA. This is inconsistent with how committed improvements and the new roads that have been constructed are dealt with at other sites assessed in the STA.

**Figure 27: Section 106 Agreement Improvements – Gateway South, Ryton Gigafactory and Whitley South developments**



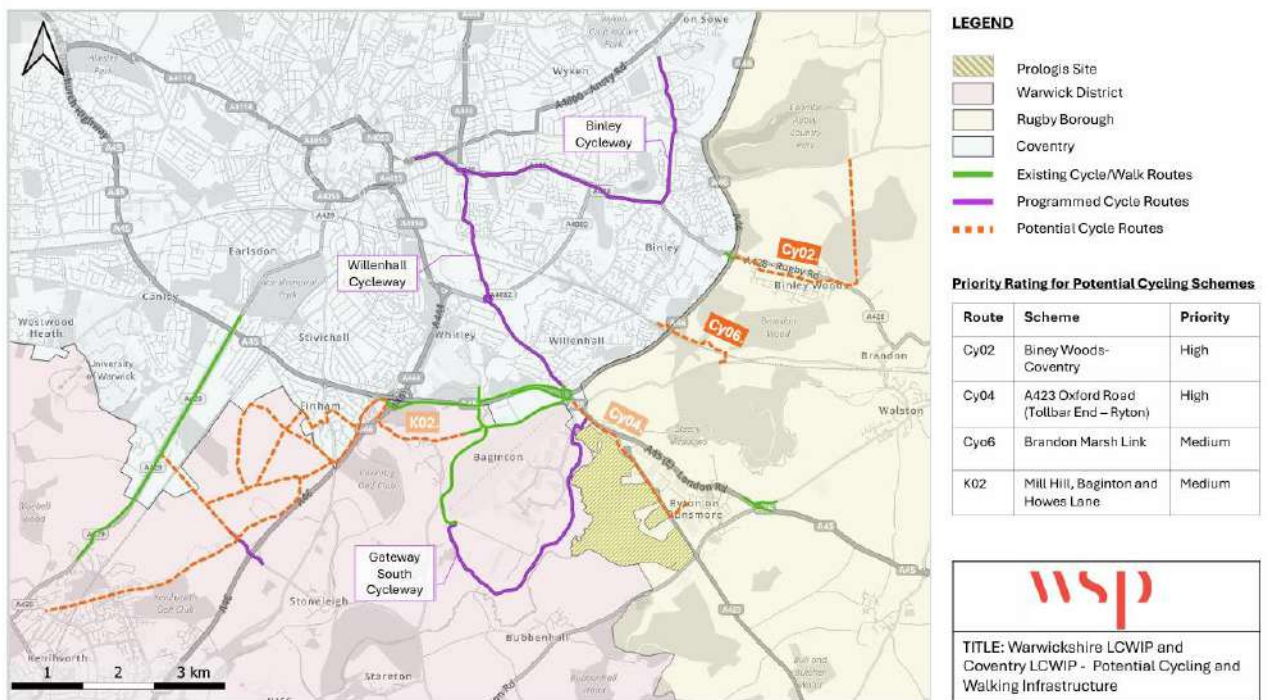
## WARWICKSHIRE AND COVENTRY LCWIP

- 4.2.11. The walking and cycling enhancements relevant to the Ryton West site derive from both the Coventry Local Cycling and Walking Infrastructure Plan (LCWIP), prepared as a part of the Coventry Transport Strategy approved in December 2022, and the Warwickshire LCWIP, adopted by Warwickshire County Council in February 2024. Together, these plans set out long-term programmes for delivering continuous, high-quality active-travel corridors, with the intention of supporting modal shift, reducing car dependency, and improving connections between key employment areas and residential communities; they are presented in Figure 28.
- 4.2.12. The Coventry Transport Strategy identifies the development of a complete network of segregated cycleways spanning the city, including the City Centre, Foleshill, Willenhall, Eastern Green and Coundon corridors. Two showcase routes, the Coundon Cycleway and the Binley Cycleway, have already been completed, with further extensions such as the Clifford Bridge Road section currently under construction. These schemes form the foundation of a wider network intended to enable safer, more direct active-travel movement across the city.
- 4.2.13. Within this network, the Willenhall Cycleway is the most strategically relevant to the Ryton Prologis site. Ongoing construction phases between the city centre, ASDA Roundabout, Humber Road and Tollbar Island will create a continuous route linking the Coventry City Centre and A45. This forms the primary infrastructure spine that could support future connections toward the Ryton area.
- 4.2.14. Complementing this, the Warwickshire LCWIP identifies several proposed connections between Rugby Borough and Coventry. Of these, Cy04 (A423 Oxford Road: Tollbar End – Ryton) is a high-priority intervention, providing a direct footway/cycle track connection along Oxford Road and thereby bridging the gap between the Willenhall Cycleway and Ryton. Additional medium-priority

routes, including K02 and links such as Cy02 and Cy06, further enhance access to the wider cross-boundary network as shown in Figure 28.

- 4.2.15. Collectively, the Willenhall Cycleway, Cy04 and K02 represent the LCWIP schemes with the most significant potential to benefit the Ryton West. Once delivered, they would establish a high-quality, continuous active-travel corridor between Coventry, Binley Woods and Ryton, enabling employees to walk, wheel or cycle to the site. These improvements would support a measurable shift away from private car use, reducing trip generation of the Ryton West site
- 4.2.16. Should these schemes be realised, their inclusion within future TRAAC accessibility assessments may result in a higher accessibility score for the Ryton Prologis site.

**Figure 28: Walk/Cycle Routes in relation to the Ryton West Site**



### 4.3 CONSIDERATIONS

- 4.3.1. It is recognised that several planned improvements related to active travel are expected near the site, and these will affect how the Ryton West connects to the wider network. These changes will also impact the accessibility score for the site. It appears that not all relevant factors have been taken into account during the assessment of the site's accessibility, which could further reduce the number and effect of vehicle trips on the network. Consequently, this impact on the A46/ Tollbar junction may be less than what was anticipated in the STA.

## 5 A46/ TOLLBAR JUNCTION

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- 5.1.1. The A46 Tollbar End junction had historically been operating above its intended design capacity, resulting in sustained congestion and delay during peak periods. The previous improvement scheme was therefore progressed to address these long-standing operational deficiencies, with the objectives of reducing traffic congestion, enhancing access to key employment areas and Coventry Airport, and improving both safety and pedestrian connectivity around the junction.
- 5.1.2. Supported through the associated CPO processes, the scheme opened in March 2017, and post-opening evaluation confirmed performance improvements across several key movements. It is understood that the original scheme was designed for growth in the region.

### 5.2 OPPORTUNITIES FOR IMPROVEMENT

- 5.2.1. It is important to acknowledge the limitations of the STA modelling undertaken to inform the Local Plan. A more appropriate approach for understanding the operation of the A46/Tollbar End junction may be the use of the Kenilworth and Stoneleigh Wide Area (KSWA) model, rather than the RRAM, given the KSWA model's greater ability to represent network changes and traffic reassignment effects. This includes capturing the role of Firefly Road as a westward routing corridor, which is expected—under accurate modelling—to rebalance flows and reduce development-related pressure on the strategic road network, including at Tollbar End.
- 5.2.2. Furthermore, the cumulative impact of investment associated with other major developments, such as Coventry Gigafactory, must be recognised. The active travel, sustainable transport and highway improvements linked to these schemes will collectively reduce vehicle demand and enhance network performance in the vicinity of Ryton West.
- 5.2.3. Notwithstanding the above, opportunities remain for further optimisation of the junction. Signal optimisation has been identified as a credible measure to improve operational efficiency, potentially in conjunction with reallocation of lane assignment on each approach and on the roundabout, responding to the changes in traffic flows since the scheme was introduced. In parallel, a vision-led approach to transport planning, embedding the sustainable transport interventions set out within the Ryton West sustainable transport strategy, would be expected to reduce vehicular trip generation from the site and contribute positively to wider network performance.
- 5.2.4. In addition, a review of highway boundary information in the vicinity of the A46/ Tollbar End junction as shown in Figure 29 indicates potential opportunities to increase capacity through localised carriageway widening on the approach to the junction, as well as reviewing lane markings and allocation to respond to the changes in traffic flows that have occurred since the junction was designed and implemented, reflecting the findings of post-submission reviews completed by NH.

**Figure 29: A46/ Tollbar End – NH Highway Boundary**



- 5.2.5. These cumulative matters which increase capacity and reduce the demand through the junction positively contribute to reducing queues and delays for all users of A46 Tollbar junction. The STA highlights that signal optimisation was completed in the assessment of the network. However, with lower traffic flows through the junction as noted throughout this report, both from the agreed trip rates and sustainable transport measures proposed for Ryton West, and the consideration of improvements and reassignment of traffic from committed development, there is greater potential for the signal optimisation to have a greater benefit.
- 5.2.6. Furthermore, as noted earlier in this report, National Highways has not challenged the findings or recommended that Ryton West site is omitted from the Local Plan due to congestion at the A46 Tollbar junction.

## 6 OTHER RELATED EVIDENCE

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### 6.1 INFRASTRUCTURE DELIVERY PLAN

- 6.1.1. In the 'Infrastructure Delivery Schedule – Proposed Submission Rugby Borough Local Plan December 2025', it is noted that the Warwickshire County Council will have delivery responsibility of the LCWIP and BSIP schemes. Some of the LCWIP schemes have been partly or completely implemented while the others are at concept stage. The capital and revenue projects in the BSIP are at different stages of development.
- 6.1.2. The funding source is a mix of capital/grant funding from government and Warwickshire County Council and developer contributions. Section 106 contributions from sites to nearby schemes identified in the LCWIP and BSIP are likely to be justified on an individual site basis. Potentially applicable schemes to each site are identified in Strategic Transport Assessment Addendum Appendix TN007\_A. The local plan is dependent on delivering the identified LCWIP and BSIP schemes as these form a key part of the mitigation package associated with the delivery of the Regulation 19 Local Plan.
- 6.1.3. There are no additional measures identified at the A46/ Tollbar End junction in support of the Infrastructure Delivery Schedule

### 6.2 SUSTAINABILITY APPRAISAL

- 6.2.1. The Sustainability Appraisal of the Rugby Borough Local Plan dated December 2025, has been reviewed from a transport perspective in relation to the Ryton West and in Para 5.2.34, it has been mentioned that the considered Prologis/Mount Park as a major alternative strategic employment site it could potentially boost the Local Plan's contribution to Coventry's unmet need recognising that, whilst it would be B8 led, the effect of edge of Coventry manufacturing / R&D agglomeration is to suggest very good potential to also deliver non-B8 uses.
- 6.2.2. The Sustainability Appraisal identifies, through Table 6.2 of the employment land growth scenarios, that under Scenario 2 the Ryton West site performs more favourably than the alternative sites. This scoring on the "Transport" heading could be improved if the adjustments highlighted in this report regarding A46/ Tollbar junction, including reduced traffic flows, allowance for committed investment in transport infrastructure, the array of sustainable access opportunities for future employees and the potential improvement measures to improve the junction performance were taken into account.

**Figure 30: Extract from Sustainability Appraisal Report – in relation to Ryton West Site- Appraisal Matrix**

## Appraisal

6.3.2 A lighter touch approach to appraisal is taken relative to the approach taken above. Specifically, Table 6.2 presents a summary appraisal matrix, followed by a discussion.

**Table 6.2: Employment land growth scenarios appraisal**

Topic	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Accessibility	★ 1	★ 1	2	3
Air quality	=	=	=	=
Biodiversity	2	2	★ 1	★ 1
Climate change adaptation	=	=	=	=
Climate change mitigation	=	=	=	=
Communities, health & wellbeing	=	=	=	=
Economy & employment	2	★ 1	3	4
Historic environment	3	★ 1	2	2
Homes	=	=	=	=
Landscape & townscape	2	★ 1	★ 1	★ 1
Resources	=	=	=	=
Transport	★ 1	4	3	2
Water	=	=	=	=

## 7 CONCLUSION

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- 7.1.1. These representations to the Regulation 19 stage of the Rugby Borough Council Local Plan have been prepared on behalf of Prologis and Mountpark, with respect to the potential development at Ryton West.
- 7.1.2. The Strategic Transport Assessment (STA) prepared on behalf of Warwickshire County Council (WCC) has been reviewed and is the primary focus of this report. The modelling used to test Ryton West in the STA, by WCCs own reporting, does not calibrate at A46/ Tollbar, particularly on dominant movements from the A45 to the A46 Eastbound. Furthermore, the model was developed using pre-COVID-19 data so does not reflect more recent travel behaviours and also before new road infrastructure (including Firefly Road) was completed. The modelled network also does not include Firefly Road (which was open to traffic in 2021). The exclusion of this infrastructure from the model is significant, as it influences routing patterns for both existing and committed development traffic in the vicinity of the A46/Tollbar roundabout. Alternative modelling platforms, such as the KSWA and CASM models, incorporate this infrastructure and therefore offer a more representative basis for assessing development impacts.
- 7.1.3. In addition, the STA does not apply the agreed trip generation for Ryton West, resulting in an overestimation in excess of 2,000 two-way vehicle trips during both the morning and evening peak period. When this is considered alongside the omission of committed sustainable transport measures and planned junction improvements, the modelling cumulatively inflates the forecast impacts at the A46/Tollbar End junction. These deficiencies lead to an inconsistent and unreliable interpretation of network performance.
- 7.1.4. WCC's 2024 assessment in support of Regulation 18 concluded that the site is accessible and situated on one of the least congested parts of the network. National Highways similarly raised no objection to Ryton West or any other sites considered through the Rugby Local Plan process. Since that assessment, the evidence base has strengthened further. A comprehensive sustainable transport strategy has been developed that accords with the National Planning Policy Framework (NPPF) and supports reductions in traffic associated with both existing and future development. Wider initiatives—including the Coventry Very Light Rail proposals and transport enhancements linked to the Coventry Gigafactory—provide additional opportunities to support mode shift and improve connectivity. Crucially, none of these factors have been reflected in the strategic modelling, despite their relevance and potential to materially alter outcomes.
- 7.1.5. There also remains scope for junction enhancements at Tollbar End that would further reduce queueing and delay for residual vehicle trips. When all of the above matters are properly considered, the degree of reliance that can reasonably be placed on the STA's conclusions is significantly diminished. On this basis, the available evidence does not provide a robust justification for any adverse conclusions regarding the suitability of Ryton in highway terms for allocation within the Rugby Local Plan.
- 7.1.6. Accordingly, it is requested that the modelling for the STA is updated to address the issues highlighted through this report. In accordance with the National Highways advice, this should be completed and updated in collaboration with National Highways as well as Prologis.



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