Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	**Ref:** **(For official use only)**

Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026 By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in the subject line, OR by post to**: Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
	**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*	
Title	[redacted]	Mr
First Name	[redacted]	Darren
Last Name	[redacted]	Venables
Job Title (where relevant)	Head of Planning UK	Associate
Organisation (where relevant)	Prologis	Delta Planning
Address Line 1		Arca Building
Line 2		59 Temple Row
Line 3		Birmingham
Line 4		
Post Code		B2 5AF
Telephone Number		[redacted]
E-mail Address (where relevant)		[redacted]

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

Name or Organisation: Prologis c/o Delta Planning

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

Paragraph	1.1	Policy		Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes	X	No	

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 see Prologis' full response within 'Response on Behalf of Prologis UK Limited' submission statement. With regard to the plan period, a summary of our comments made in our full submission statement is provided below.

Prologis objects to the proposed plan period of 2025-2042 as set out at Paragraph 1.1 of the Proposed Submission Plan and contends that it is not sound. Our conclusions in relation to the tests of soundness are as follows:

The plan period fails the tests of soundness because it is not:

- Positively prepared: The plan period is the bare minimum required and there is a significant risk that it would fall short of even that minimum period if there are any plan making delays. In doing so it risks failing to meet the area's objectively assessed needs and would result in an inadequate supply of land to support economic growth. It is therefore clearly not positively prepared.

- Justified: The proposed plan period does not align with any of the plan periods assessed in the evidence base.

- Consistent with national policy: Paragraph 22 of the NPPF24 requires local plans to be prepared for a minimum 15-year period from the date of

adoption. There is a very high risk this policy requirement will not be met. This is not consistent with the NPPF24.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan period should be updated to 2025-2045 as a minimum, if not to 2050. The consequence of a plan period change on employment land provision should then be addressed in Policy S3 (see separate response below).

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Prologis to attend hearing sessions to participate in detailed engagement on the reasons identified for the plan period being unsound under its planned duration.

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.*

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

Name or Organisation: Prologis c/o Delta Planning

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

Paragraph	1.9, 1.10 1.25-1.28	Policy	S3	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	X
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	X

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see Prologis' full response within 'Response on Behalf of Prologis UK Limited' submission statement. With regard to Policy S3 and paragraphs 1.9, 1.10 and 1.25-8, a summary of our comments made in our full submission statement is provided below.

Our conclusions in relation to the overall employment provision within Policy S3 are as follows:

Legal Compliance

Based on the evidence currently available, if the plan were to proceed in its current form, Prologis considers that it would not be legally compliant on the basis that RBC has failed to comply with the Duty to Cooperate because it has not properly accounted for the unmet employment land needs of Coventry City Council.

Tests of Soundness

Policy S3 fails the tests of soundness because it is not:

- Positively prepared: Policy S3 fails to plan for the full objectively assessed need due to an evidence base lacking robustness to underpin a positive economic strategy for growth. Furthermore, the preparation of the policy has not taken proper account of necessary cross-boundary discussions with neighbouring authorities in relation to the quantum of strategic distribution development. It has failed to take on sufficient unmet need from Coventry,

and it has failed to re-provide for the loss of 90ha of employment land that was formerly counted in the strategic supply of Coventry Gateway South.

- Justified: RBC has not robustly justified the amount of employment land needed in Rugby.

- Effective: Policy S3 will not be effective in delivering growth in line with national policy. It does not identify the true level of need, nor allocate sufficient land to meet the need. By restricting its delivery programme to a 17-year period ending in 2042, it also risks being insufficient should there be any meaningful delay to the Examination Programme.

- Consistent with national policy: The Policy fails to enable the delivery of sustainable development and help create the conditions required for businesses to invest, expand and adapt in accordance with the NPPF24. The Policy does not provide sufficient certainty as to the direction of travel of the Borough's economy given the strength of its location at the heart of England's strategic road and rail network.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Proposed Submission Plan should be updated, underpinned with an updated evidence base to ensure that the conflicts identified within Policy S3 are addressed to ensure legal compliance and soundness, as follows:

- The policy or supporting text should clearly articulate the objectively assessed need figure arising from the evidence base that the Policy is seeking to meet;
- Properly address the errors that have been acknowledged in the evidence base, in particular by accounting for the full 90ha adjustment from Coventry Gateway South (thus increasing the overall strategic land requirement by a further 40ha);
- Cater for the full 45 ha of Coventry's unmet need;
- Address other supply side errors amounting to approximately 2.6 ha;
- Collectively, the above changes would add some 85 ha to the requirement as a minimum, bringing the total provision to in the order of 355 ha;
- If the extension to the plan period discussed in section 2 of this submission is accepted, then additional provision should also be built in as follows: +93.7 ha to 2043, +110.2 ha to 2045, or +150.7 ha to 2050;
- The employment land requirement should be expressed as a <u>minimum</u> as required by the NPPF24.
- Having made the necessary adjustment to the overall requirement figure; the table below Policy S3 with the spatial distribution of sites should then be altered to identify additional sites to meet any unmet need.
- As set out in our responses below to Policy S7 and Site ID 328, given the clear suitability of the land at Prologis Park Ryton West and Mountpark, this opportunity should be added back into to the portfolio of sites. This would add a further 82 ha (net) to the supply, (67 ha (net) from Prologis and 15 ha (net) from Mountpark.

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Prologis to attend hearing sessions to participate in detailed engagement on the reasons identified for the spatial strategy for strategic employment being unsound in its current form.

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.*

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

Name or Organisation: Prologis c/o Delta Planning

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

Paragraph	1.35-7	Policy	Table of S3 and S7	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	X
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	X

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see Prologis' full response within 'Response on Behalf of Prologis UK Limited' submission statement. With regard to the Table in Policy S3, Policy S7 and paragraphs 1.35-7, a summary of our comments made in our full submission statement is provided below.

Our conclusions in relation to the overall spatial strategy for employment land provision as set out in Policy S3 and S7 are as follows:

Legal Compliance

Based on the evidence currently available, if the plan were to proceed in its current form, Prologis considers that it would not be legally compliant on the basis that the Sustainability Appraisal (SA) is inadequate as the Council has failed to correctly and reasonably consider a viable alternative site to meet employment land needs.

Tests of Soundness

It is contended that the selected growth strategy for employment (Growth Scenario 1) would not be found sound. Growth Scenario 1 (selected employment allocations in Policies S3/S7) is found to be a wholly unsuitable site for development, and the erroneous Strategic Transport Assessment has led to the dismissal of Growth Scenario 2 (selected employment allocations in Policies S3/S7, but substituting Walsgrave Hill with Ryton West) based on evidence that lacks any robustness.

We conclude that there are no substantive changes since the last Rugby Local Plan examination that would warrant a materially different conclusion to those held by the previous Inspector in dismissing Walsgrave Hill.

Selecting Growth Scenario 1 fails the tests of soundness because it is not:

- Positively prepared: RBC has acknowledged that Growth Scenario 1 would make a reduced contribution towards Coventry's unmet need than Walsgrave Hill. Indeed, it does not even support meeting the requirement to meet the full and objectively assessed needs as set out elsewhere in this submission. Growth Scenario 2 would have provided a far more positive alternative.
- Justified: The evidence presented to make the switch from the Preferred Option Plan to Growth Option 1 is erroneous in terms of transport impacts, and it also significantly underplays the level of harm that Growth Option 1 would cause to heritage assets of national significance. This was a key reason why the site was discounted (for arguably a less impactful form of development) by the Inspector at the examination into the current Borough Plan. It is clear that the option chosen would cause irreversible harm to a number of heritage assets of national significance. It is therefore not a properly justified scenario.
- Effective: While it may be possible that Growth Scenario 1 is deliverable during the plan period, as it proposes less floorspace, it will be insufficient to meet the level of employment need identified through these representations. Consequently, Growth Scenario 2 would be the more effective alternative site in this regard.
- Consistent with national policy: Growth Scenario 1 would not facilitate sustainable development. The serious harms identified by the previous Inspector in relation to heritage and potentially ecology are no different now to then (even taking into account the proposed Country Park). It would therefore fail to comply with paragraph 11 of the NPPF24.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The evidence base requires updating for accuracy in relation to historic environment, transport, ecology and biodiversity in line with the required changes set out in detail in Prologis' full response within 'Response on Behalf of Prologis UK Limited' submission statement.

The Proposed Submission Plan consultation should be amended to replace Growth Scenario 1 (Walsgrave Hill) with Growth Scenario 2 (Ryton West). As a minimum, Ryton West should be added back into the plan. We explore the significant merits of the Ryton West site in the next section of this statement.

As an alternative, should it subsequently be agreed that the employment land requirements should be higher in line with our submissions within the 'Response on Behalf of Prologis UK Limited' submission statement, RBC should undertake a

SA option including both Walsgrave Hill and Prologis Park Ryton West and Mountpark but utilising the evidence base correctly to evaluate whether both options could come forward through the plan together.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Prologis to attend hearing sessions to participate in detailed engagement on the reasons identified for the spatial strategy for strategic employment being unsound in its current form.

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

Name or Organisation: Prologis c/o Delta Planning

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

Paragraph		Policy		Policies Map	
Site ID	121				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	X
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	X

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see Prologis' full response within 'Response on Behalf of Prologis UK Limited' submission statement.

With regard to Site 121 being identified as an allocated employment site through the Proposed Submission Plan, please refer to our full response contained in section 5 of the 'Response on Behalf of Prologis UK Limited' submission statement and our summary in these forms pertaining to Table in Policy S3, Policy S7 and paragraphs 1.35-7.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to our full response contained in section 5 of the 'Response on Behalf of Prologis UK Limited' submission statement and our summary in these forms pertaining to Table in Policy S3, Policy S7 and paragraphs 1.35-7.

(Continue on a separate sheet /expand box if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Prologis to attend hearing sessions to participate in detailed engagement on the reasons identified for the spatial strategy for strategic employment being unsound in its current form.

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

Name or Organisation: Prologis c/o Delta Planning

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

Paragraph		Policy		Policies Map	
Site ID	328				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	X
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	X

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
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Please see Prologis' full response within 'Response on Behalf of Prologis UK Limited' submission statement.

With regard to Site 328 as an omission site through the Proposed Submission Plan, please refer to our full response contained in sections 5 and 6 of the 'Response on Behalf of Prologis UK Limited' submission statement and our summary in these forms pertaining to Table in Policy S3, Policy S7 and paragraphs 1.35-7.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to our full response contained in sections 5 and 6 of the 'Response on Behalf of Prologis UK Limited' submission statement and our summary in these forms pertaining to Table in Policy S3, Policy S7 and paragraphs 1.35-7.

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

	No, I do not wish to participate in hearing session(s)	X	**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Rugby Borough Local Plan 2025-2042 Proposed Submission Version Consultation

Response on Behalf of Prologis UK Limited

March 2026

DeltaPlanning

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Appendix 1 – Assessment of Employment Land Evidence Base

Appendix 2 – Comparative Heritage Assessment of Walsgrave Hill and Ryton West

Appendix 3 – Response to RBC Transport Evidence Base

Appendix 4 – Prologis Park Ryton West Vision Statement

Appendix 5 – Rugby Local Plan Housing Background Paper 2017

Appendix 6 – Extracts from Inspector's Report into the Rugby Local Plan 2017

Appendix 7 – WPDG Letter of Support

Representations prepared by:

Delta Planning
Arca Building, 59 Temple Row,
Birmingham, B2 5AF
[redacted]
www.deltaplanning.co.uk

March 2026

1. Executive Summary

1.1. These representations have been prepared on behalf of Prologis UK Limited (Prologis) by Delta Planning and Lichfields with regard to the Proposed Submission Version of the Rugby Borough Local Plan (January 2026) (the Proposed Submission Plan) and its associated evidence base.

1.2. **Prologis strongly objects to the omission of Prologis Park Ryton West and Mountpark as a strategic employment allocation (Site ID: 328) from the Proposed Submission Plan**, having previously been a draft allocation in the Regulation 18 Preferred Option Draft of the Local Plan (the Preferred Option Plan). **Following a detailed review of the Proposed Submission Plan and its evidence base, Prologis contends that the Proposed Submission Plan would not be legally compliant, nor be found sound, as detailed below.**

Legal Compliance

1.3. Based on the evidence currently available, if the Plan were to proceed in its current form it would not be legally compliant on the following grounds:

i) that Rugby Borough Council (RBC) has failed the Duty to Cooperate because it has not properly accounted for the unmet employment land needs of Coventry City Council. Accordingly, it does not comply with Section 110 of the Localism Act 2011.

ii) that the Sustainability Appraisal (SA) is inadequate as the Council has failed to correctly and reasonably consider a viable alternative site to meet employment land needs, namely land was included in the Preferred Option Plan referred to as Prologis Park Ryton West and Mountpark. Accordingly, it does not comply with the Strategic Environmental Assessment (SEA) Directive and the Environment Assessment of Plans and Programmes Regulations 2004.

Soundness

1.4. In addition, based on the evidence currently available, if the Plan were to proceed in its current form it would not be found sound in accordance with the tests of soundness in the National Planning Policy Framework (2024) (NPPF24). This is submitted on the following grounds:

i) **The plan is not positively prepared** – it does not provide an adequate time period and does not, as a minimum, seek to meet the area's objectively assessed needs; nor the unmet need from Coventry;

ii) **The plan is not appropriately justified** – it does not adequately nor correctly take into account the only reasonable alternative option at Prologis Park Ryton West and Mountpark;

iii) **The plan is not effective** – the plan is not based on effective joint working on cross-boundary strategic matters given it fails to meet the unmet employment needs of Coventry City Council; and

iv) **The plan is not consistent with national policy** – the plan does not provide for an adequate time period as required by the Framework and in selecting Walsgrave Hill over Prologis Park Ryton West and Mountpark it results in the plan selecting a spatial option that would not deliver a sustainable pattern of employment development in accordance with the policies in NPPF24 and other relevant statements of national planning policy.

Overarching Summary of Submission

1.5. Taking the issues above into the context of the specific policies and supporting paragraphs of the Proposed Submission Plan, the following submissions are made:

1.6. **Local Plan Period 2025-2042**: We object to this plan period on the basis that it is does not meet the tests of soundness. It is submitted that it is not positively prepared, justified or consistent with national policy which requires that strategic policies look ahead over a minimum 15 year period from adoption. We consider that it is inevitable that by the time the plan is adopted there will be less than 15 years remaining of the plan period. **It is requested that the plan period should be 2025-45 as a minimum, if not to 2050.** The full response on this matter is provided within Section 3 of these representations.

1.7. **Strategic Employment Land Provision (Policy S3)**: We object to Policy S3 on the basis that is neither legally compliant nor sound. It is not legally compliant because it does not properly account for the unmet employment land needs of Coventry City Council and therefore fails the duty to cooperate. It is furthermore not sound because it is not positively prepared, effective or consistent with national policy as it does not meet the area's objectively assessed employment land needs. **It is suggested that the employment land provision should be increased by at least 85 ha, and significantly more if the plan period is extended as it should be.** This would at least address unmet needs in Coventry, and correct errors in the Council's evidence base. **Given the immediate proximity and shared market area of the Prologis Park Ryton West and Mountpark site, it is ideally placed to meet any additional need.** The full response on this is provided within Section 4 of these representations.

1.8. **Spatial Distribution of Strategic Employment Land Growth (Policy S3 and S7)**: The site selection is derived from Growth Scenario Option 1 in the Sustainability Appraisal, and includes land at Walsgrave Hill (Site ID 121) as an allocation as a direct replacement for land at Prologis Park Ryton West and Mountpark (Site ID 328) which had been included at Preferred Option Plan stage. This site is now referenced as Growth Scenario Option 2 in the Sustainability Appraisal. Prologis has a material concern that the approach to reasonable alternatives does not satisfy the requirements of the SEA Regulations in that it has failed to correctly and reasonably consider a viable alternative site to meet employment land needs. In any event, the Plan is unsound. The strategy is not justified, not positively prepared and not consistent with national policy, as it relies on flawed transport modelling and materially underplays the comparative heritage impacts of Walsgrave Hill. **It is therefore requested that Prologis Park Ryton West and Mountpark (SA Growth Scenario 2) should be added back into the plan.** The full response on this is provided within Section 5 of these representations, and further details relating to Prologis' vision for Prologis Park Ryton West is provided with Section 6.

1.9. **Exceptional Circumstances**: To meet the identified needs and spatial distribution of development, an exceptional circumstances case is set out by RBC in the Exceptional Circumstances Topic Paper. Notwithstanding that Prologis objects to Growth Scenario 2 not being selected, Prologis generally aligns with the underpinning need for Green Belt boundary alterations to serve Coventry's needs. However the Topic Paper does need to be amended to include a sequential approach to site selection. The full response on this is provided within Section 7 of these representations.

2. Introduction and Scope of Submission

2.1. These representations have been prepared on behalf of Prologis UK Limited (Prologis) by Delta Planning and Lichfields with regard to the Proposed Submission Version of the Rugby Borough Local Plan (January 2026) (the Proposed Submission Plan) and its associated evidence base.

2.2. The following sections of this submission provide the full response to the summaries contained within the completed Representation Forms.

- Section 3 – Responds to the proposed plan period at paragraph 1.1 of the plan.
- Section 4 – Responds to the proposed employment land provision within Policy S3.
- Section 5 – Responds to the proposed spatial distribution of employment sites within policies S3 and S7.
- Section 6 – Provides further information on Prologis Park Ryton West.
- Section 7 – Responds to the Council's Exceptional Circumstances case for Green Belt boundary changes.

2.3. In addition to this main submission statement response a number of supporting documents are provided as Appendices to the representations as follows:

- **Appendix 1 – Assessment of Employment Land Evidence Base (Policy S3) – prepared by Lichfields (the Lichfields Report)**: this sets out an analysis of the underpinning economic evidence base across Rugby Borough and explains in detail why the employment land requirement needs to be increased.
- **Appendix 2 – Comparative heritage assessment of Walsgrave Hill and Prologis Park Ryton West/Mountpark – prepared by RPS Tetra Tech (The RPS Report):** this sets out the significant heritage constraints that exist at Walsgrave Hill, in comparison to the Prologis Park Ryton West and Mountpark option, and explains why the spatial strategy for employment is therefore unacceptable from a heritage perspective.
- **Appendix 3 – Response to RBC Evidence Base for Transport – prepared by WSP (The WSP Report)**: this sets out a detailed analysis of the transport evidence base and in particular the WCC Strategic Transport Assessment, and the incorrect conclusions derived from it by RBC. It also demonstrates how the Prologis Park Ryton West and Mountpark site is a sustainable option for active travel and public

transport as the alternative.

- **Appendix 4 - Prologis Park Ryton West Vision Statement**: this document sets out the latest vision for Prologis Park Ryton West and the emerging master plan for the site. It is an update of a previous version submitted to the Preferred Option Plan.
- **Appendix 5** - **Inspector's Report on the Examination of the Rugby Borough Local Plan 2011-2031** – Planning Inspectorate – March 2019 (Inspector's Report 2019). This provides further background relating the suitability of the Walsgrave Hill site.
- **Appendix 6** - **Rugby Borough Local Plan 2011-2031 Housing Background Paper** – RBC – September 2017 (Housing Background Paper 2017). This provides further background relating the suitability of the Walsgrave Hill site.

2.4. In making these representations we refer to the following published evidence base documents published by RBC in support of the Local Plan Review:

- Sustainability Appraisal of the Rugby Borough Local Plan – AECOM – March 2025 (SA Report March 2025)
- Sustainability Appraisal of the Rugby Borough Local Plan – AECOM – December 2025 (SA Report December 2025)
- The Coventry and Warwickshire Housing and Economic Development Needs Assessment – 2022 – Iceni (HEDNA)
- West Midlands Strategic Employment Sites Study 2023/24 – Mace and Iceni – August 2024 (WMSESS 2024)
- Coventry & Warwickshire HEDNA – WMSESS Alignment Paper – Iceni – September 2024 (Alignment Paper)
- Coventry & Warwickshire Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper – November 2025 (Alignment Paper Addendum)
- Development Needs Topic Paper – RBC – December 2025
- Housing and Economic Land Availability Assessment – RBC – 2025 (HELAA 2025)
- Rugby Borough Stage 2 Site Options Assessment – RBC – December 2025 (Site Assessments Paper)

- Green Belt Contribution Study Strategic Assessment – LUC – October 2025 and Green Belt Contribution Study – Stage 2: Site Contribution Assessments – LUC – December 2025 (Green Belt Contribution Study)

- Green Belt - Exceptional Circumstances Paper – RBC – December 2025 (Exceptional Circumstances Paper)

- Heritage Assessment of Local Plan Site Allocations for Rugby Borough Council – Node – December 2025 (Heritage Assessment)

- Rugby Strategic Transport Assessment, Traffic Modelling Analysis and Overview – SLR – October 2025 (STA)

- Duty to Cooperate Statement of Compliance – RBC – January 2026 (DtC Compliance Paper)

3. Local Plan Period

3.1. Paragraph 1.1 of the Proposed Submission Plan sets out the Local Plan period: 2025-2042, or just 17 years. This represents a significant reduction from the plan period set out in the Preferred Option Plan, which was for the period 2024-2045, i.e. 21 years. We strongly object to this proposal.

3.2. The RBC justification for the approach is set out the SA Report December 2025. This notes that this shorter plan period for the Proposed Submission Plan has been proposed in accordance with paragraph 22 of NPPF24 as there is *'limited case for identifying "larger scale development such as new settlements or significant extensions…" through the new local plan*'. In addition, it states that '*there is little strategic case for questioning the preferred approach of: A) planning to 2042 rather than to 2045'.*

3.3. The reasoning if further set out by RBC in its officers report to Cabinet (January 2026)[1]. This sets out that the longer-term growth of Rugby Borough would be better undertaken by a successor unitary authority following local government reorganisation, while being informed by the new spatial development strategies. It also notes that because the new residential allocations are not large-scale urban expansions or new settlements (with the exception of carried forward sites at Houlton and SW Rugby) they are therefore unlikely to be still being built in the 2040s. The report also acknowledges however that it is partly justified in order to counteract the increase in housing numbers arising from the new standard method of calculating housing need.

3.4. Finally, the report to Cabinet also accepts that the plan period is the shortest that it can be and there is a risk that if not adopted before 1st April 2027, the Plan period would be less than 15 years from that point. It also provides clear recognition that there is a risk such an approach could be found inadequate at local plan examination stage, but suggests that the RBC could defend its position by claiming the shortfall "*would be minimal*".

3.5. We strongly disagree with the RBC proposal and consider that the original plan period to 2045 should have been retained as a minimum, if not longer to 2050 or beyond. The RBC is not a positive approach to planning for the future of the area's needs as required by the NPPF24 paragraph 15, and suggestions that it simply deferrals decisions to future plan making bodies, and avoids difficult decisions on housing numbers are totally unsatisfactory.

3.6. Paragraph 22 of NPPF24 is clear in that it states:

[1] Rugby Borough Local Plan 2025-2042 Regulation 19 Consultation and Submission – Cabinet Paper – January 2026

'*Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery'*

3.7. The NPPF24 is therefore very clear. 15 years is a minimum. It is not a maximum. A shortfall, no matter how minimal, would be a departure from policy. A delay or slippage that leads to adoption in the second half of 2027 or into 2028 would mean that the plan would only have a 14 year period from the point of adoption. Given local plan preparation slippage is a common feature of plan making, RBC should not be planning to make a case for a shorter plan period than the minimum requirement, especially in the context that they have previously been preparing the plan for a longer period.

3.8. In addition, it is not the case that the Proposed Submission Plan does not contain any larger scale developments. Rather Policy S2 (Strategy for Homes) is predicated on the fact much of the housing growth in the Borough will be delivered across three very large sites, at Houlton, South West Rugby and Eden Park. Similarly, the strategy for employment land is highly dependent on strategic sites over 100,000 sqm in size (Padge Hall Farm, Crowner Fields Farm, Coton Park East and Land at Walsgrave Hill). Large scale sites are therefore very much at the heart of the Proposed Submission Plan.

3.9. Furthermore, paragraph 145 of NPPF24 is also clear that when Green Belt boundaries are changed, they should endure beyond the plan period.

'Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.'

3.10. Therefore, a longer timeframe is clearly justified in this instance taking into account the larger site allocations and the requirement to alter Green Belt boundaries. Consequently, a Local Plan period longer than the minimum 15 years should be adopted.

3.11. It is considered that all the above factors point in favour of revising the plan period back to at least 2045 as was proposed at Preferred Option Plan stage, or even to 2050, which is in line with the longer time horizon (2021-2045/2050) in RBC's employment land evidence base including the HEDNA, WMSESS, the Alignment Paper and its Addendum. The shorter plan period approach simply does not accord with national policy and is therefore not sound.

Conclusions on Plan Period

3.12. In summary, Prologis objects to the proposed plan period of 2025-2042 as set out at Paragraph 1.1 of the Proposed Submission Plan and contends that it is not sound. Our conclusions in relation to the tests of soundness are as follows:

Tests of Soundness

3.13. The plan period fails the tests of soundness because it is not:

- Positively prepared: The plan period is the bare minimum required and there is a significant risk that it would fall short of even that minimum period if there are any plan making delays. In doing so it risks failing to meet the area's objectively assessed needs and would result in an inadequate supply of land to support economic growth. It is therefore clearly not positively prepared.

- Justified: The proposed plan period does not align with any of the plan periods assessed in the evidence base.

- Consistent with national policy: Paragraph 22 of the NPPF24 requires local plans to be prepared for a minimum 15-year period from the date of adoption. There is a very high risk this policy requirement will not be met. This is not consistent with the NPPF24.

Requested Changes

3.14. The plan period should be updated to 2025-2045 as a minimum, if not to 2050. The consequence of a plan period change on employment land provision is discussed in the following sections of these representations.

4. Employment Land Provision (Policy S3)

Summary of proposed policy approach

4.1. Policy S3, and paragraphs 1.9, 1.10, 1.25-1.28 of the Proposed Submission Plan, provide RBC's policies for the delivery of employment land to meet economic needs.

4.2. Policy S3 sets out the proposed employment land delivery in Rugby over the Plan period 2025-2042 and the locations that are expected to deliver it. It states that 19,761.3 sqm of use class E(g)(i) and (ii) office floorspace (3.95 hectares [ha]) will be provided, alongside 1,034,000 sqm (c. 287 ha) of floorspace for use classes B2, B8 and E(g)(iii). Regarding the latter requirement, the Policy states that 1,034,243 sqm of new floorspace in Use Classes B2, B8 and E(g)(iii) will be delivered, predominantly across 9 large sites, as set out in the Table below:

Table 1: New Floorspace to be Delivered in Rugby Borough

Source	**Approximate square metres of floorspace 2025-2042**
Prospero Ansty and Ansty Park	26,663
Coton Park East of Castle Mound Way	26,421
Padge Hall Farm	137,730
Houlton remaining employment land	15,000
Employment planning permissions on small sites as at 1st April 2025	13,429.4
New Allocations under Policy S7	
Crowner Fields Farm, Ansty	275,000
Coton Park East	115,000
South West Rugby Phase 2	60,000
Ansty Park North	75,000
Land at Walsgrave Hill	290,000
TOTAL	**1,034,243**

Source: Proposed Submission Plan, Policy S3

4.3. Paragraph 1.10 of the Proposed Submission Plan states that the strategy will deliver all of RBC's assessed local need together with all of the sub regional large site (strategic employment land requirement) that is identified for Opportunity Area 7 (OA7) (M6/A45/A46/M45 Coventry & Rugby) in the WMSESS 2024. It also states that it also includes a contribution of 2.5ha towards Coventry's unmet strategic employment needs.

4.4. Paragraph 1.11 sets out a spatial strategy for meeting the identified employment requirement, which is in essence to focus growth on the edges of Rugby and Coventry, as the main centres of labour, as expansions of existing employment areas with good access to main roads, active travel and public transport. Paragraph 1.12 then briefly describes the proposed new allocations.

4.5. Paragraphs 1.13 and 1.26 of the Proposed Submission Plan also both note that since delivery of employment land in recent years has been skewed towards large units, some new large site allocations will be required to include an element of smaller units.

Assessment of Employment Land Provision Under Policy S3

4.6. Prologis strongly objects to Policy S3 on the basis that:

i. Neither the Policy nor its supporting text set out clearly the requirement figure that the policy is seeking to meet; and

ii. The level of provision set out in the policy is not supported by a sound and robust evidence base. This has resulted in RBC not meeting the full objectively assessed need for industrial and distribution uses, either at a local or strategic level.

Scale of Need in Employment Land Evidence Base

4.7. The need for B2, B8 and E(g)(iii) land set out in Policy S3 is derived from the HEDNA, WMSESS, Alignment Paper, Alignment Paper Addendum and the Development Needs Topic Paper. However, the policy does not clearly articulate the objectively assessed need figure arising from that evidence base. Instead, it proceeds directly to specify a level of provision without transparently linking this back to the evidenced need. This clearly needs adding into the supporting text to the policy.

Level of Provision

4.8. The evidence base against which the proposed level of provision is derived is assessed in the Lichfields Report provided alongside this submission as **Appendix 1**. This identifies a number of key concerns with the robustness of the evidence base that leads to an under provision of employment land over the plan period. This identifies a number of key concerns with the robustness of the evidence base that leads to an under provision of employment land over the plan period. The main points are:

i) **A failure to fully replace 90.6 ha of supply lost at Coventry Gateway South:** The Alignment Paper Addendum accepted that the 178 ha forward supply at Coventry Gateway South had been over-estimated in the previous evidence base documents by some 90.6 ha due to the erroneous inclusion of the country park from the total area. As a result the Alignment Paper Addendum states there is now a potential requirement for up to two additional c.50 ha B8/Mixed sites and that "*taking into account the reduced years-supply in Area 7 and its highest market ranking of 'A'…it would be appropriate for at least one of these additional sites i.e. 50 ha to be apportioned to Area 7*". Whilst welcoming the acknowledgment of the error, Lichfields disagree with the failure to fully re-provide the lost 90.6 ha in Area 7. The **40.6 ha shortfall** has not been provided for elsewhere, no explanation has been provided for how it will be delivered elsewhere, and in our opinion is unlikely to be so. This is a clear soundness failure in RBC's evidence base and Policy S3, as the decision to re-provide only 50 ha is not justified.

ii) **Coventry's Unmet Needs:** RBC states that it is contributing 2.5 ha of Coventry City's 9 ha unmet local industrial land needs. **This substantially misrepresents Coventry's actual position**. Coventry City Council's (CCC) Submission Draft Local Plan (September 2025) states that its residual unmet employment land need is some 45 ha. Whilst we note that CCC has put forward a pre-examination proposed modification to reduce this unmet need to 9 ha, there is no robust basis for doing so. Indeed, we note that it is based on an employment land update paper produced by ICENI which justifies the change by projecting forward an annual 'windfall allowance' of 2.75 ha per year. We strongly disagree with this highly unusual approach, which represents a failure of plan making and which has not been replicated elsewhere in the sub-region. CCC itself had discounted such an approach in the recent past. The Coventry Local plan examination will no doubt test this approach thoroughly, but in the meantime, RBC must continue to plan for the full unmet need and contribute an additional 42.5 ha above the 2.5 ha of unmet need currently provided. Otherwise, this represents a failure both of soundness - in that the Plan is not positively prepared by declining to meet CCC's unmet need in full when in a position to do so – but also a legal failure of the Duty to Cooperate that must be addressed.

iii) **Fundamental flaws in the Council's employment land evidence base**: There are significant flaws in the robustness of much of Policy S3's evidence base to the detriment of the soundness of the Plan, resulting in the overall need for employment land being significantly under-estimated. Our concerns include matters such as under-providing strategic sites and forcing larger occupiers onto small sites that perform poorly relative to their needs; an excessive brownfield recycling adjustment that arbitrarily deducts 50%, or 860 ha, of need; apparent errors in the calculation of local B2/B8 needs in Rugby (whose requirement declines from 150.5 ha in the 2022 HEDNA to just 27 ha in the 2024 Alignment Paper); a failure to revisit the econometric modelling in the latter document; and a disproportionately low provision of strategic units on small sites in C&W. RBC's employment land requirement is significantly under-estimated as a result.

iv) **An over-estimation of the current forward supply of sites.** Delta Planning's analysis of the Council's forward supply of employment land suggests that three sites should be removed from the portfolio altogether: Padge Hall Farm (1,380 sqm, or 0.39 ha @35% given RBC consider it to be strategic); Land south of A5 Watling Street (7,530 sqm / 1.88 ha @40%); and Unit 3, Imperial Road (530 sqm / 0.13 ha). **This increases the shortfall by a further 2.4 ha**.

v) **A Plan period of insufficient length.** The proposed Local Plan period runs for just 17 years, from 2025-2042. As discussed within Section 2 of this submission, it is unlikely to run for the minimum 15-year period from adoption as required by the NPPF as it would need to be adopted before 1st April 2027, which will be challenging. This points in favour of extending the plan period to at least 2045 and potentially to 2050, which is in line with the time horizons in RBC's evidence base. Extending the Plan period would increase the employment land requirement accordingly. On a pro-rata basis, the total local and strategic unmet need would increase by 24.7 ha to 2045; and by 65.2 ha to 2050. Even a 1 year addition to 2043 would add 8.2 ha to the need.

4.9. Collectively, **these adjustments would suggest that at least another 85 ha is required to 2042, and if the plan is extended it would increase to 93.7 ha to 2043, 110.2 ha to 2045, and up to as much as 150.7 ha to 2050.**

4.10. In this regard, Policy S3 does not comply with paragraph 20 of the NPPF24, which states that plans should make sufficient provision for its and use needs, including employment. Paragraph 85 further states that*:*

> *"planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt'.*

4.11. It goes on to state:

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

4.12. In addition, Paragraph 87 of the NPPF24 states:

> *'Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for…storage and distribution operations at a variety of scales and in suitably accessible locations.'*

4.13. NPPF24 therefore unambiguously requires RBC to positively and proactively plan to meet its economic growth needs in full, as well as those of adjoining authorities that cannot meet their own needs. It specifically requires the Council to identify sites for freight and logistics at a variety of scales and in suitably accessible locations.

4.14. Policy S3 as currently drafted does not do this. It is not robust and fails to comply with the NPPF24. The identification of 287 ha as the industrial/distribution land requirement is insufficient to fully address the needs

of these crucial sectors of the economy. RBC is required to do all that it can to facilitate economic growth and ensure that the planning system is straightforward to navigate for developers. This means engaging positively with landowners and key industry stakeholders such as Prologis, removing red tape and front-loading infrastructure requirements. We consider that the employment land requirement options set out in in S3 would not align with the Government's aspirations for growth and underplay the true need for employment land (and specifically strategic logistics units) across the Borough.

4.15. Given the immediate proximity and shared market area of the Prologis Park Ryton West and Mountpark site, it is ideally placed to meet any additional need. This will be discussed further in sections 4 and 5 of this submission.

4.16. Finally, with regard to RBCs evidence on the Duty To Cooperate, we note the DtC Compliance Paper states that RBC considers it has fully met its responsibilities in regard to the Duty to Cooperate. It states discussions will continue, and updates provided where necessary but accepts that there are gaps to complete. Whilst it states long engagement with Coventry, the Duty requires effective cooperation, not just a long engagement log. The evidence provided to date shows that this engagement has not translated into an agreed strategy or effective outcome for addressing Coventry's unmet employment land needs. Indeed, the Memorandum of Understanding expressly leaves this matter unresolved and key partners have declined to sign it, and Statements of Common Ground are deferred to a future stage. Taken together, this raises a serious question as to whether the Duty to Cooperate has been satisfied in substance.

Conclusions on Policy S3

4.17. Our conclusions in relation to the overall employment provision within Policy S3 are as follows:

Legal Compliance

4.18. Based on the evidence currently available, if the plan were to proceed in its current form, Prologis considers that it would not be legally compliant on the basis that RBC has failed to comply with the Duty to Cooperate because it has not properly accounted for the unmet employment land needs of Coventry City Council.

Tests of Soundness

4.19. Policy S3 fails the tests of soundness because it is not:

- Positively prepared: Policy S3 fails to plan for the full objectively assessed need due to an evidence base lacking robustness to underpin

a positive economic strategy for growth. Furthermore, the preparation of the policy has not taken proper account of necessary cross-boundary discussions with neighbouring authorities in relation to the quantum of strategic distribution development. It has failed to take on sufficient unmet need from Coventry, and it has failed to re-provide for the loss of 90ha of employment land that was formerly counted in the strategic supply of Coventry Gateway South.

- Justified: RBC has not robustly justified the amount of employment land needed in Rugby.
- Effective: Policy S3 will not be effective in delivering growth in line with national policy. It does not identify the true level of need, nor allocate sufficient land to meet the need. By restricting its delivery programme to a 17-year period ending in 2042, it also risks being insufficient should there be any meaningful delay to the Examination Programme.
- Consistent with national policy: The Policy fails to enable the delivery of sustainable development and help create the conditions required for businesses to invest, expand and adapt in accordance with the NPPF24. The Policy does not provide sufficient certainty as to the direction of travel of the Borough's economy given the strength of its location at the heart of England's strategic road and rail network.

Requested Changes

4.20. The Proposed Submission Plan should be updated, underpinned with an updated evidence base to ensure that the conflicts identified within Policy S3 are addressed to ensure legal compliance and soundness, as follows:

- The policy or supporting text should clearly articulate the objectively assessed need figure arising from the evidence base that the Policy is seeking to meet;
- Properly address the errors that have been acknowledged in the evidence base, in particular by accounting for the full 90ha adjustment from Coventry Gateway South (thus increasing the overall strategic land requirement by a further 40ha);
- Cater for the full 45 ha of Coventry's unmet need;
- Address other supply side errors amounting to approximately 2.6 ha;
- Collectively, the above changes would add some 85 ha to the requirement as a minimum, bringing the total provision to in the order of 355 ha;
- If the extension to the plan period discussed in section 2 of this submission is accepted, then additional provision should also be built in

as follows: +93.7 ha to 2043, +110.2 ha to 2045, or +150.7 ha to 2050;

- The employment land requirement should be expressed as a minimum as required by the NPPF24.
- Having made the necessary adjustment to the overall requirement figure; the table below Policy S3 with the spatial distribution of sites should then be altered to identify additional sites to meet any unmet need.
- As discussed in the following sections of our submission, given the clear suitability of the land at Prologis Park Ryton West and Mountpark, this opportunity should be added back into to the portfolio of sites. This would add a further 82 ha (net) to the supply, (67 ha (net) from Prologis and 15 ha (net) from Mountpark.

5. Employment Land Allocations (Policies S3/S7)

5.1. The spatial distribution of strategic employment growth is set out both within the Table of Policy S3 and then in full within Policy S7, as well as paragraphs 1.35-7. Prologis strongly objects to the spatial strategy in the Proposed Submission Plan, and specifically the exclusion of Prologis Park Ryton West and Mountpark (site 328), which was included in the Preferred Option Plan, and its replacement with Walsgrave Hill (Site 121). This switch of sites is entirely unjustified and without merit such that the plan as proposed is now not legally complaint or sound. The reasons for this and set out below within this section.

Relevant Background

5.2. Since the consultation on the Preferred Option Plan in May 2025, there has been a significant shift in the strategic employment site spatial strategy. In the Preferred Option Plan, Prologis Park Ryton West/Mountpark (Site 328) was proposed as being the largest of the allocations to meet identified needs, totalling 350,000 sq.m. It is clear from the RBC report to Cabinet in January 2026 that the switch to Walsgrave Hill has arisen following the publication of the Strategic Transport Assessment (STA) in October 2025. As discussed later in this section, this STA is however fundamentally flawed and we contend that RBC has also overstated its conclusions in making the decision to change growth options. Prologis strongly objects to this change and it is requested that Prologis Park Ryton West and Mountpark is re-allocated.

5.3. The approach taken by RBC has been assessed and justified through the SA Report December 2025, which accompanies the Proposed Submission Plan consultation. This updates the earlier SA Report March 2025 and sets out that four Strategic Employment Growth Scenarios were considered:

- Scenario 1 – the proposed submission plan approach – Walsgrave Hill with all other proposed employment allocations broadly remaining as set out in the previous Preferred Option Plan (except for the reduction of floorspace at South West Rugby)
- Scenario 2 – Scenario 1 but with Walsgrave Hill replaced by Prologis Park Ryton West and 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.

5.4. With regard to Scenarios 3 and 4, RBC have effectively ruled these out through adopting a spatial approach that focus a key element of the growth in a location which is well placed to serve the large population centre of Coventry. Prologis agrees with the Council's conclusion that the most sustainable and effective strategy is to direct strategic employment growth towards the Coventry edge, rather than dispersing it elsewhere in the Borough. We explore the justification for exceptional circumstances in that regard within Section 6 of these representations.

5.5. Turning therefore to examine Growth Scenario 1, we first review the background to Walsgrave Hill as a site through the following documents:

- Inspector's Report to adopted Rugby Local Plan (2019), which previously considered Walsgrave Hill as a potential growth location.
- Sustainability Appraisal March 2025, which demonstrated that Prologis Park Ryton West and Mountpark was the preferred Growth Scenario and concluded that Walsgrave Hill was not even a core option.
- Sustainability Appraisal 2026, which now concludes that Walsgrave Hill is the preferred growth strategy (Growth Scenario 1) based on what Prologis contends are erroneous transport and heritage assessments.

Local Plan Inspector's Report 2019

5.6. It is a significant material consideration that the land at Walsgrave Hill was previously considered as a potential location for growth as part of the preparation of the current Rugby Local Plan, albeit for a smaller development focused on housing. At the Preferred Option Stage of that plan, Walsgrave Hill was identified as a potential residential site of 1,500 homes, and named at that time as Walsgrave Hill Farm. It was however removed at Regulation 19 stage. Of note the promoters were actually seeking a larger allocation area to include for both 1,500 homes and 90ha of employment. The commercial element was argued as necessary to help fund a new junction onto the A46 and a dedicated blue light access to Walsgrave Hospital.

5.7. However, as is made clear through a Housing Background Paper produced as part of the evidence base at that time (Reproduced as **Appendix 5**), the draft allocation was removed on a number of grounds which included:

i. National Highways (then Highways England) expressed concern with the timing of the delivery of the new A46 junction and the ability of the allocation to deliver sufficient houses during the plan period.

ii. Due to alternative non Green Belt locations for new housing becoming available, RBC concluded that the case for exceptional circumstances was no longer met;

iii. Strong concerns had been raised by Historic England on the impact to key heritage assets; and

iv. Concerns were raised by Natural England on the impact upon the nearby Coombe Pools SSSI.

5.8. During the local plan examination that followed, the Planning Inspector also set out his assessment of why the Walsgrave Hill site would be unsuitable for the proposed allocation. In summary, the points made were (see paragraphs 72-75 of the Inspectors Report (Provided as **Appendix 6**):

- Green Belt: It was concluded that the proposed development at Walsgrave Hill would, in the Inspector's words, cause *'**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**'*.
- Heritage and Ecology: It was concluded that the harm caused by development at Walsgrave Hill on nationally important heritage and wildlife assets at Coombe Park would, in the Inspector's words, *'**weigh heavily against**'* the site's allocation. (Coombe Park is a Grade II* registered park and garden which provides both the setting for Coombe Abbey (Grade I listed building) as well as containing Coombe Pools SSSI within it.
- Emergency ('blue light') access: The Inspector's Report notes that the provision of a dedicated emergency access to the University Hospital at Walsgrave as proposed by the promoters was not dependent upon the development of the part of Walsgrave Hill that falls within Rugby as was claimed by the promoters. This Inspector noted that *'**Evidence from Coventry City Council for the examination of the Coventry Local Plan states that the delivery of this site is not dependent on land within Rugby Borough at Walsgrave Hill Farm being allocated for development**'*. This was because the residential allocation in Coventry (Coventry Local Plan ref. H2:3) for the western section of Walsgrave Hill can deliver this anyway, and indeed the Coventry Local Plan policy explicitly states it as a requirement. As such, the Inspector concludes that this ***'does not constitute exceptional circumstances to justify the release of a significant area of GB land'***. We note that this position is unchanged, and that the new Submission Draft Coventry Plan retains the allocation (again under Policy H2:3) and the requirement that a 'blue light' access be delivered as part of the Coventry residential allocation.

5.9. The previous Inspector's conclusions were reached in the context of a predominantly residential proposal - a form of development that would plainly have generated a lower impact on the setting of the sensitive heritage assets situated both within and adjacent to the Walsgrave Hill site than the use that is now proposed by RBC in the Proposed Submission Plan. It is apparent that there would need to be a materially different set of circumstances to depart from the conclusions derived from the Inspector's conclusions above, but no such material changes exist. Certainly, the heritage and ecological sensitivity remains and the case surrounding the funding of the A46 junction upgrade and the blue light access remains unproven.

5.10. Indeed, the case is arguably weaker for bringing that land forward in the context of National Highways commitment to build the A46 junction itself (the DCO for which has recently been confirmed). In these circumstances, there is no compelling planning basis to allocate the site for strategic employment development, and its inclusion in the Plan is not justified.

Sustainability Appraisal March 2025

5.11. In relation to the SA Report March 2025 which accompanied the Preferred Option Plan, it is notable that Walsgrave Hill was not even a core option. In terms of employment land, nine sites for employment land growth were considered and placed in sequential order (paragraph 5.2.42), as follows:

1. SW Rugby SUE (committed as reserve site)
2. M6 Junction 1 (Coton Park East) (existing residential allocation)
3. M6 Junction 2, Ansty Park
4. Prologis Park Ryton West
5. North of Houlton
6. A45/A4071
7. Magna Park
8. Walsgrave Hill
9. South of Hinckley

5.12. Notably, at paragraph 5.2.43 the SA states:

'In conclusion, there is limited case for giving further detailed consideration to the growth options lower down in this list presented above, given the extent of employment land needs (accounting for both 'strategic' and 'local' need).'

5.13. In terms of the specific commentary associated with the individual sites, Paragraph 5.2.42 states quite clearly that Walsgrave Hill "*performs poorly relative to options discussed above, noting biodiversity and landscape / Green Belt constraint*".

Sustainability Appraisal December 2025

5.14. Turning to the SA Report December 2025, with little explanation, the Walsgrave Hill site has moved from not even being a core option, to being the approach selected for the Proposed Submission Plan. This switch is inexplicable and unjustified. This SA Report December 2025 does not re-analyse alternatives for all proposed employment allocations. Instead, it focuses on Walsgrave Hill with all other allocations and compares it to three other scenarios where Walsgrave Hill is substituted.

5.15. As set out at the start of this section, we analyse Growth Scenarios 1 and 2 below as these have the spatial distribution required next to Coventry (Walsgrave Hill and Ryton West respectively). Notwithstanding this, it is notable that the total score of Scenarios 3 and 4 are 12 and 13 respectively, which are higher scores still than the already higher score that Scenarios 1 has over Scenario 2. It should be noted that a lower score reflects that a site is less constrained by a particular technical consideration.

Table 2: SA (December 2025) Growth Scenarios 1 and 2 Comparison

Topic	**Scenario 1 (Walsgrave Hill)**	**Scenario 2 (Ryton West)**
Accessibility	1	1
Air Quality	=	=
Biodiversity	2	2
Climate change adaption	=	=
Climate change mitigation	=	=
Communities, health and wellbeing	=	=
Economy & employment	2	1

Historic environment	3	1
Homes	=	=
Landscape & townscape	2	1
Resources	=	=
Transport	1	4
Water	=	=
Total	11	10

5.16. As can be seen, Growth Scenario 2 scored slightly lower than Scenario 1, but this was then ignored.

5.17. Aside from the lower scoring overall, a number of noticeable aspects arise from consideration of the SA. First is that Growth Scenario 1 scores worse in relation to economy & employment, historic environment, landscape & townscape compared to Growth Scenario 2. The only exception to whether Scenario 1 scores better is transport. However, this is based on an erroneous assessment and incorrectly interpreted conclusions as will be discussed further.

5.18. With regard to economy, the SA December 2025 notes that Growth Scenario 2 would make a greater contribution towards Coventry's unmet need than Walsgrave Hill. Furthermore, the SA Report December 2025 notes at paragraph 5.2.15 that there *'is a need to remain open to higher growth'* on the basis of Coventry's unmet need of 9ha (albeit as noted previously in our submission, we contend this should be up to 45ha) and that the employment figures are to 2042 rather than 2045 as per the evidence base. However, it then fails to test a higher growth scenario on the basis that it is claimed a higher growth scenario has been planned for, with paragraph 5.2.19 stating *'there is limited strategic case for significantly lower or higher growth scenarios'*. As set out in section 3 of this submission, we contend that in fact a higher growth scenario is required to meet the objectively assessed need. Notwithstanding that, it is still clear that Growth Scenario 2 is the better option than Growth Scenario 1, the extra capacity of Growth Scenario 2 will go some way to address the extra objectively assessed employment land need.

5.19. We explore in further detail below the historic environment, transport and biodiversity evidence base. This is because we contend that all of these are flawed in relation to Walsgrave Hill or Ryton West, as follows:

- **Historic Environment**: it is very surprising that Walsgrave Hill is only scored 3 for historic environment when there are significant heritage assets both within and adjoining the site. This should have scored 5 at the very least.
- **Transport**: we contend that the score for transport should be considerably lower for Growth Scenario 2.
- **Biodiversity**: we note that Growth Scenario 1 is afforded a biodiversity score of 2. We contend that this should arguably be higher given its immediate proximity to a SSSI.

5.20. We appraise these aspects in greater detail below. These should be read alongside the detailed technical responses that are Appended where relevant.

Historic Environment

5.21. Prologis has appointed RPS Tetra Tech to analyse the sensitivity of the proposed development at Walsgrave Hill in heritage terms, and has compared it to the sensitivity within which Prologis Park Ryton West/Mountpark falls. This report is provided as **Appendix 2** (the RPS Report).

5.22. The findings of this report concludes as follows:

- It is clear from a comparison of the heritage constraints posed by the development of both sites, that on heritage grounds – the Prologis Park Ryton West and Mountpark site could be developed with no, or worst case very limited/negligible impacts to any designated heritage assets.
- By contrast the location of the Land at Walsgrave Hill is intrinsically highly sensitive. Not only does the site contain within it a Grade II Listed Farmhouse, but this area of land also provides the last vestige of an undeveloped crucial buffer between Coombe Abbey Grade II* Registered Park and Garden (and its Conservation Area) with the urban extents of Coventry. Notwithstanding the enhanced buffer proposed from previous site options, the area remains the immediate foreground and historic context for these assets of national importance. Under the NPPF24, the conservation of designated heritage assets must be given great weight, and the guidance is explicit that *'the more important the asset, the greater the weight should be..'.* The undeveloped nature of the site protects what remains of the tranquil setting of these assets and would result in a moderate to high degree of less than substantial harms to these assets.
- Planning decision makers need to be that they have accounted for weight to be afforded to this harm in their assessment. In the context of

this situation, it is difficult to see how the needs case for development of the Land at Walsgrave Hill site outweighs the heritage harm when the Prologis Park Ryton West and Mountpark site is available.

5.23. Whilst the heritage impacts are also flagged as a concern to RBC in the Council's own evidence base on Heritage Assessment prepared by Node, it is considered that the constraints are overwhelmingly underplayed in the SA Report December 2025. This affords Walsgrave Hill only a score of 3 for historic environment, which according to the SA is neutral. Given the evidence, it is concluded that this is inexplicable. It is clear that at the very least the score should be a moderate or uncertain effect (i.e. a Score of at least 5 which we have applied later).

Transport

5.24. WSP has been commissioned by Prologis to assess the STA in detail, which has informed the SA Report December 2025. WSP has also looked into how Growth Scenario 2 (as the alternative) would perform in terms of be accessibility to sustainable transport and active travel measures. These two aspects are explored in further detail below. The full report is provided as **Appendix 3** to this submission (The WSP Report). The findings summarised below:

Strategic Transport Assessment

5.25. The SA Report December 2025 appears to cast doubt on the site's suitability for allocation solely based upon the initial modelling in the STA and for no other reason. However, it is important to note that Warwickshire County Council indicated that the site was accessible and located on one of the least congested parts of the network in 2024. Also of note is that at no point has National Highways stated an objection to Prologis Park Ryton West/Mountpark, rather making general observations about network constraints for consideration on various sites only.

5.26. The STA casts doubt on the impacts on the highway network should Prologis Park Ryton West and Mountpark come forward as a strategic employment site for 350,000 sq.m of B2/B8/E(g)(iii). The report notes the following:

> *'…given its size and location, has a significant impact on Toll Bar End. The new junction arrangement proposed for the Walsgrave junction appears more able to accommodate and disperse the additional traffic growth than is the case with the Prologis Park development which appears more significantly constrained by the operation of the Toll Bar End junction.*

The results indicate that should the Walsgrave site replace the Prologis Park West site, then the residual impacts on the critical SRN junctions are reduced'

5.27. It is to be noted that the STA does not rule out the site, but does note that WCC considers the impacts on Toll Bar End junction would be more constrained by Ryton West.

5.28. However, WSP has found a number of critical flaws in the modelling and assumptions, which makes the conclusions derived highly questionable as follows:

- The STA fails to take into account the mitigation associated with Whitley South, SEGRO Gateway South and the Gigafactory sites have not been included in the committed infrastructure of the 2031 forecast year case model, in spite of funding being secured through planning obligations. This has not been taken into account in the modelling. This approach is inconsistent with many other committed sites tested in the STA. Network changes, with the most significant being the construction of Silver Eagle Way and Firefly Road, appear to have not been incorporated in the 2031 forecast year model's network coding. These reduce traffic flows away from Tollbar End and have not been modelled.

- As a result of the above, this suggests that contrary conclusions in the STA have been afforded when compared to those reached through previous planning permissions, and could therefore overestimate the volume of traffic, queues and delays at the A46 Tollbar Island. This is compounded by mode shift assumptions only being applied to RWA model (whereas the A46 Tollbar Island is RRAM model).

- This omission then impacts the analysis of the 'Do Nothing' and 'Do Something' at 2045 scenarios in which it then shows that no differences in queueing are observed. However, with planned enhancements near to Prologis Park Ryton West and Mountpark, it is anticipated that modelling outputs and performance of the A46 Tollbar junction would be improved.

- As a result of the above, the Kenilworth and Stoneleigh Wide Area (KWSA) model should have been used instead of the RRAM model. This would more accurately represent development-related traffic impacts on the strategic road network, particularly in the vicinity of A46 Tollbar Island. This would ensure that actual operational effects are fully understood before any conclusions are drawn regarding the proposed Local Plan allocations.

- Furthermore, 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 Prologis Park Ryton West and Mountpark when compared to agreements made with National Highways through pre-application engagement.

- Notwithstanding this, the modelled flows contained in the STA have not been properly calibrated, meaning that Tollbar Island may perform worse in the model than in reality. Therefore, the model's results are not robust.

5.29. At present, the STA is not fit to inform the suitability of Prologis Park Ryton West and Mountpark. Accordingly, the Proposed Submission Plan is not supported by robust evidence on highway impacts of the Prologis Park Ryton West/Mountpark site and cannot be relied upon to inform the spatial distribution of the Local Plan.

Sustainable Transport

5.30. At Preferred Option Plan stage, Prologis commissioned WSP to prepare a Sustainable Transport Strategy in support of Ryton West (Growth Scenario 2). This set out a range of potential sustainable transport and active travel measures that could be implemented as part of the development. This would include a full network of pedestrian and cycle routes through the site and beyond the site boundary.

5.31. A central part to its delivery is a Sustainable Transport Interchange. This would provide a central bus interchange, in which new and/or extended and more frequent bus routes from the surrounding area will arrive at the site.

5.32. The site already has a passing bus service directly linking it to Rugby and Coventry (Routes 25 and 25A) and there are opportunities for network enhancement and a possible service re-routing through the site.

5.33. From the Transport Interchange it is envisaged that an internal shuttle bus service would then provide a convenient, hassle free and cost-effective addition to public bus services to reach destinations throughout the Site.

5.34. The proposal not only benefits the proposed Ryton West development, but also the existing Prologis Park Ryton site, as it will increase bus frequency and routes, as well as pedestrian and cycle connectivity to this site also. This would greatly enhance the sustainability of this major employment site and Ryton-on-Dunsmore generally. Therefore, the benefits (including to congestion, air quality and emissions) extend far beyond the proposed development itself.

5.35. The extension of Very Light Rail (VLR) to Tollbar End appears to be the priority of all future VLR extensions, including to Ansty Park. The development of Ryton West is not predicated upon the VLR's delivery. However, it would enhance the offer even further if it was delivered.

5.36. Collectively, the strategy demonstrates compliance with the NPPF24's 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.

5.37. In relation to paragraph 110 of the NPPF24, by locating strategic employment growth in an area that is reasonably accessible currently, but has significant opportunities for enhancement, this will reduce impacts of congestion, emissions, air quality and public health far more than locating development in areas (such as Walsgrave Hill) where those benefits will be far less significant beyond the site boundaries.

5.38. Furthermore, in relation to paragraph 115 of the NPPF24, the provision of a Sustainable Transport Interchange ensures that sustainable transport modes are prioritised, while also ensuring that genuinely safe and suitable access to the site can be provided.

5.39. It is therefore contended that Ryton West (Growth Scenario 2) can be made a highly sustainable location.

5.40. By contrast, for Growth Scenario 1, the ability to achieve sustainable development through sustainable transport modes has to be put into question. The proposal is relying upon the delivery of Very Light Rail to Ansty Park for its sustainable transport connection. However, the delivery of this is by no means certain. Furthermore, we are not aware of any proposal for a bus interchange, or similar, at the park.

5.41. Therefore, Growth Scenario 2 should score considerably more favourably than shown. We would suggest a score of no greater than 2 (neutral).

Ecology and Biodiversity

5.42. In regard to matters relating to ecology and biodiversity, it is noted that the SA Report December 2025 scores both Walsgrave Hill and Prologis Ryton West/Mountpark Growth Scenario's as Score 2, meaning that that they both have limited biodiversity constraints.

5.43. This scoring is surprising for Walsgrave Hill given the site is immediately adjacent to a SSSI at Coombe Abbey, a concern raised by the Inspector at the previous local plan examination as referenced earlier. The SA Report also notes at paragraph 6.3.3 the following:

"Walsgrave Hill is sensitive on account of proximity to Coombe Pool SSSI; however, there is good potential to avoid impacts through delivery of the aforementioned new country park. At both Prologis/Mountpark and North of Houlton there is an opportunity to deliver enhancements to a river/stream corridor. The opportunity is more significant at the Prologis/Mountpark, but equally the river corridor here is associated with more extensive biodiversity sensitivity"

5.44. Given the above it is not clear why Walsgrave Hill was not concluded to be of higher sensitivity (Score 3 or above).

5.45. With regard to Prologis Park Ryton West/Mountpark the reference to its river corridor having biodiversity sensitivity has been considered by Prologis and no issues of significant concern have arisen. It is noted that Council's ecology consultants evidence base highlights a potential functional linkage of Ryton West in ecological and hydrological/hydrogeological terms to Brandon Marsh SSSI and Ryton Woods SSSI. However, it is clear in fact Prologis Park Ryton West and Mountpark has no sensitive linkages to national or internationally designated sites. The key points are:

- The are no internationally designed sites in the study area, and therefore the issue of functionally linked land does not arise;
- Nationally designated sites do not have the same functional linkage policy protection as international sites, and in any event there is no functional linkage and habitats alongside the river corridor would be retained;
- The Prologis/Mountpark site is downstream from both SSSIs referenced and there are no connected groundwater pathways. Therefore, neither of the SSSI's are hydrologically or hydrologically connected to the site;
- Air quality impacts on the SSSIs during construction and operation can be considered insignificant given they would fall below the screening criteria derived from guidance from Natural England and the Institute of Air Quality Management (IAQM); and
- The proposals for the site will preserve the habitats of most value, and through the introduction of a new Country Park, will provide new high-quality habitats.

5.46. As a result of the above, it is surprising that Growth Scenario 1 is not a higher sensitivity in ecological terms than Growth Scenario 2. Nevertheless, for the purposes of the summary below both sites have been left as Score level 2.

Conclusions to the Sustainability Appraisal December 2025

5.47. When taking all the above into account it is clear that an alternative total score for these two Scenario's in the SA Report December 2025 would be as follows:

Table 4: Corrected Scoring for Growth Scenarios 1 and 2 (Previous scoring where changed in brackets)

Topic	Scenario 1 (Walsgrave Hill)	Scenario 2 (Ryton West)
Accessibility	1	1
Air Quality	=	=
Biodiversity	2	2
Climate change adaption	=	=
Climate change mitigation	=	=
Communities, health and wellbeing	=	=
Economy & employment	2	1
Historic environment	5 (from 3)	1
Homes	=	=
Landscape & townscape	2	1
Resources	=	=
Transport	1	2 (from 4)
Water	=	=
Total	13 (from 11)	8 (from 10)

5.48. The above demonstrates that with correct interpretation of the relative merits of the growth scenario's, the scoring above very clearly now falls towards Scenario 2.

5.49. Of note that notwithstanding the flawed conclusions of the SA Report December 2025, it still struggles to depart from the more rationale conclusions of the SA Report March 2025, noting at paragraph 5.2.34 that while there is *'no possibility'* of allocating both Walsgrave Hill and Ryton West sites, *'it is reasonable to remain open to the possibility of allocating 'Prologis/Mountpark' instead of Walsgrave Hill'*.

5.50. It also notes that Ryton West would make a greater contribution towards Coventry's unmet need than Walsgrave Hill (at least 60,000 sq.m more). This again supports Ryton West's allocation through Growth Scenario 2. Given our earlier conclusions with regards to the need for a longer plan period and a higher need set our elsewhere, this points clearly towards allocation of the larger site.

5.51. When factoring in all of the above, it is inescapable that Prologis Park Ryton West/Mountpark is the most appropriate and sustainable site by a considerable margin. As such, the conclusions of the SA Report December 2025 are flawed.

Conclusions

5.52. Our conclusions in relation to the overall spatial strategy for employment land provision as set out in Policy S3 and S7 are as follows:

Legal Compliance

5.53. Based on the evidence currently available, if the plan were to proceed in its current form, Prologis considers that it would not be legally compliant on the basis that the Sustainability Appraisal (SA) is inadequate as the Council has failed to correctly and reasonably consider a viable alternative site to meet employment land needs.

Tests of Soundness

5.54. It is contended that the selected growth strategy for employment (Growth Scenario 1) would not be found sound. Growth Scenario 1 is found to be a wholly unsuitable site for development, and the erroneous STA has led to the dismissal of Growth Scenario 2 based on evidence that lacks any robustness.

5.55. We conclude that there are no substantive changes since the last Rugby Local Plan examination that would warrant a materially different conclusion to those held by the previous Inspector.

5.56. Selecting Growth Scenario 1 fails the tests of soundness because it is not:

- Positively prepared: RBC has acknowledged that Growth Scenario 1 would make a reduced contribution towards Coventry's unmet need than

Walsgrave Hill. Indeed, it does not even support meeting the requirement to meet the full and objectively assessed needs as set out elsewhere in this submission. Growth Scenario 2 would have provided a far more positive alternative.

- Justified: The evidence presented to make the switch from the Preferred Option Plan to Growth Option 1 is erroneous in terms of transport impacts, and it also significantly underplays the level of harm that Growth Option 1 would cause to heritage assets of national significance. This was a key reason why the site was discounted (for arguably a less impactful form of development) by the Inspector at the examination into the current Borough Plan. It is clear that the option chosen would cause irreversible harm to a number of heritage assets of national significance. It is therefore not a properly justified scenario.
- Effective: While it may be possible that Growth Scenario 1 is deliverable during the plan period, as it proposes less floorspace, it will be insufficient to meet the level of employment need identified through these representations. Consequently, Growth Scenario 2 would be the more effective alternative site in this regard.
- Consistent with national policy: Growth Scenario 1 would not facilitate sustainable development. The serious harms identified by the previous Inspector in relation to heritage and potentially ecology are no different now to then (even taking into account the proposed Country Park). It would therefore fail to comply with paragraph 11 of the NPPF24.

Requested Changes

5.57. The evidence base requires updating for accuracy in relation to historic environment, transport, ecology and biodiversity in line with the required changes noted above.

5.58. The Proposed Submission Plan consultation should be amended to replace Growth Scenario 1 (Walsgrave Hill) with Growth Scenario 2 (Ryton West). As a minimum, Ryton West should be added back into the plan. We explore the significant merits of the Ryton West site in the next section of this statement.

5.59. As an alternative, should it subsequently be agreed that the employment land requirements should be higher in line with our submissions within Section 3 of this representation, RBC should undertake a SA option including both Walsgrave Hill and Prologis Park Ryton West and Mountpark but utilising the evidence base correctly to evaluate whether both options could come forward through the plan together.

6. Merits of Prologis Park Ryton West

6.1. As set out in the previous sections, Prologis strongly objects to the chosen spatial strategy for employment identified in the Proposed Submission Plan which omits Prologis Park Ryton West/Mountpark and replaces it with Walsgrave Hill.

6.2. To recap, the Prologis Park Ryton West/Mountpark allocation (Site ID ref 328) was included in the Preferred Option Plan and the site specific proposals included the following components:

- 171.86 ha (gross site area)
- Circa 350,000 sq.m employment floorspace.
- 55 ha publicly accessible country park alongside the River Avon;
- An on-site logistics training hub
- 8,000 sq.m of SME employment units as part of the scheme
- Overnight lorry parking facilities
- Improvements to public transport and active travel, linking into existing active travel routes at Tollbar Island and to link into Ryton-on-Dunsmore;
- 8 plots for Gypsy and Travellers; and
- Maintaining existing public rights of way.

6.3. Both Prologis and Mountpark remain fully committed to the delivery of the site and these development requirements that were contained in the Preferred Option Plan, questioning only the suitability of integrating a residential use such as the gypsy and traveller site within such an allocation.

6.4. Prologis' Vision for Ryton West is set out in the updated Vision Statement submitted as **Appendix 5** to these representations and the components of the previous draft allocation are demonstrated through this vision.

6.5. In summary the key merits of the site (entwined in some cases with the previous draft policy requirements) over and above the Walsgrave Hill option are as follows:

- **Agglomeration**: The site is located immediately west of Prologis Park Ryton, and east of Coventry Gateway, Middlemarch Business Park,

JLR Whitley and the West Midlands Gigafactory site. This location is therefore a highly successful strategic employment hub running across the Rugby and Coventry boundary. There is therefore a very strong justification for further cluster investment opportunities in this area and build on the success of the location.

- **Automotive hub**: It is a focus area for the UK's automotive industry with operators including JLR at Whitley and JLR and LEVC also both with units within the existing Prologis Park Ryton site, in addition to the proposal for the West Midlands Gigafactory.

- **Training**: Prologis' proposals for the site include a dedicated on-site logistics training hub to serve both the existing and new employment park. This will bring transformational training and education opportunities. Prologis can therefore commit to delivering the training hub referenced in the proposed development requirements. As explained further in the Vision Document which accompanies this submission, this be based off experienced delivering a highly successful Training Hub delivered at Prologis's site at DIRFT.

- **Connectivity**: It provides excellent proximity to the strategic road network, with unrivalled access to both the M45/M1, and A45/M6/M69 corridors.

- **Partnership and meeting SME needs**: Prologis has already fully committed to working in partnership with the County Council (as part landowner) and as developer of the 8,000 sq.m SME units though the Warwickshire Property Development Group (WPDG) who will deliver small to medium-sized buildings specifically targeting the local SME sector and supporting new start-up companies and innovation. WPDG has written a letter of support to Prologis about how they can deliver the SME units and this is included at **Appendix 7**. Prologis is also committed to working collaboratively with Mountpark in ensuring a comprehensive and holistic approach is taken to the masterplanning of the wider site if both sites are allocated.

- **Country Park:** Prologis and Mountpark are committed to delivering a new Country Park totalling 140 acres which not only will provide transformational benefits to access to the River Avon, but will integrate with the adjoining newly created country park at Coventry Gateway South. The Country Park will also link through to a wider network of green infrastructure linking east to The Dell local wildlife site at the southern end of the existing Prologis Park Ryton, further extending the reach of this extensive green infrastructure corridor. To the south it will also enable linkages to be created towards Ryton Pools. The

opportunity to create such a vast expanse of publicly accessible green infrastructure is a truly unique aspect of the proposals and the Prologis controlled land is critical in connecting all of the separate components together.

- **Cultural Placemaking:** Prologis will embed a cultural placemaking strategy within Ryton West, raising the bar through the design and delivery of placemaking projects, and embracing the proximity of the residential area of Ryton to provide complimentary community and learning amenities throughout the development for employees, visitors and the community;

- **Delivery**: Prologis has an unrivalled reputation for delivering parks of this kind and a track record within Rugby and surrounds through delivering both Rugby Central as well as Prologis Park Ryton, and DIRFT which is close to the eastern boundary of the Borough. As set out in the accompanying updated Vision Statement, there are no known technical constraints to the development of this site. It is considered to be suitable, immediately available and deliverable.

- **Sustainability:** Prologis approach to sustainability is market leading and summarised below:

    - Prologis is a business totally committed to reducing its impact on the environment whilst building long-standing relationships with its customers and the communities close to its Prologis Parks.

    - Prologis is committed to measuring, reducing and mitigating its carbon emissions. For over a decade, Prologis has undertaken independently verified Carbon Lifecycle Assessments for all its new developments. This data enables the company to consistently reduce embodied carbon it progresses towards its net zero target by 2040.

    - All buildings developed by Prologis since 2008 have achieved BREEAM certification, with more than 25 million sq ft of the UK portfolio achieving BREEAM Excellent or Outstanding rating. Building on this extensive experience Prologis targets, wherever possible, BREEAM Outstanding for all new developments.

    - Prologis' rooftop solar solutions meet 100% of the buildings' regulated energy demand, achieving them the highest EPC A+ ratings. This meets the UK Government definition of net zero (for regulated energy) and typically uses around 15% of the

available roof area. These base build solar arrays can be further expanded across the entire roof area to help meet customers' operational energy needs.

- Since 2018, Prologis' supply chain has signed-up to the companies Social Value Charter, sourcing goods and labour locally where possible, and spending time enhancing the local community, from volunteering and working with local schools and colleges, to promoting awareness of the benefits and career opportunities available within the sector.

- Prologis follows a Fabric First approach to designing out embodied carbon and reducing lifetime operational energy needs across all of its Parks. It seeks to measure, reduce and then mitigate 5x the residual embodied carbon emissions through its long term partnership with the rainforest protection charity Cool Earth.

6.6. In addition to the site specific benefits it is also considered that the Prologis Park Ryton West and Mountpark site would meet the definition of grey belt. Whilst it is acknowledged that the Green Belt Contribution Study only identifies part of this area as grey belt, it is contended that in actual fact the entire site does not perform strongly against purposes a, b and d of the reasons for including land within the Green Belt, as set out in the NPPF24. When assessed against the definition of grey belt with the NPPF24 and the guidance contained in Planning Practice Guidance our assessment shows:

- **Green Belt Purpose A (to check unrestricted sprawl of large built-up areas):** The site would only make a moderate contribution to this purpose. This is on the basis that it is not immediately adjacent to a large built up area (Ryton-on-Dunsmore being classified as a village) and also has one or more features which weaken its contribution to this purpose, including roads and ribbon development that partially enclose it and are in reasonable proximity such that that they would restrict and contain development, resulting in a development that would not result in an incongruous pattern of development;

- **Purpose B (prevent neighbouring towns merging into one another):** The site only makes a weak, or at most a moderate, contribution to this purpose. With Ryton-on-Dunsmore being classified as a village, the towns that the site falls between is that between Coventry and Rugby. This is a very substantial gap, and the site itself is only a small part of that gap and can clearly be developed without the loss of visual separation between these two settlements.

- **Purpose D (preserve the setting and special character of historic towns):** the site contributes no role at all to the setting of a historic town. Therefore, it provides no contribution to this purpose.

6.7. On this basis the site would meet the definition of grey belt and would therefore be sequentially preferable for development over non-grey belt locations. This is discussed further in Section 6 of this submission.

6.8. It is clear that the opportunity at Prologis Park Ryton West and Mountpark is not one that should have been dismissed by RBC in bringing forward its new local plan.

7. Exceptional Circumstances

7.1. This final section of these representations addresses the issue of Green Belt release, for which exceptional circumstances are required.

7.2. In this regard the Council has published a Topic Paper: Green Belt – Exceptional Circumstances (December 2025) which takes into account the latest Government guidance on the preparation of such studies published in February 2025. Prologis concurs with most elements of the Exceptional Circumstances Paper. Most notably the rejection of the 'all beyond the Green Belt' approach. We consider that RBC's justification for this is robust, and in summary, comprises of the following key elements:

- Proximity to a large labour pool in Coventry;
- Supporting Coventry with socio-economic issues e.g. levels of unemployment and deprivation;
- Avoids unsustainable out commuting beyond the Green Belt from Coventry and associated long distance car commuting. It would encourage greater public transport and active travel uptake.
- A large amount of new floorspace near Rugby is anticipated around DIRFT and Magna Park already, which will meet the limited labour pool at Rugby.
- Diversification agglomeration opportunities at Coventry fringe.

7.3. While Prologis strongly disagrees with the site that has been selected to meet the needs identified at the Coventry Fringe (i.e. Walsgrave Hill in favour of Prologis Park Ryton West and Mountpark), it is nevertheless agreed that the Council's underpinning exceptional circumstances case for releasing land near the Coventry fringe from the Green Belt is fully justified and meets the test of soundness.

7.4. One aspect of the Green Belt Topic Paper that is lacking is sufficient consideration of Paragraph 148 of the NPPF24. This requires that where it is necessary for Green Belt land to be released for development, plans should give priority to previously developed land, then grey belt which is not previously developed and then other Green Belt locations. This however has not been undertaken.

7.5. It is noted that the RBC Green Belt Contribution Study identifies the previously developed part of Prologis Park Ryton West and Mountpark (some 6.65 ha of the site) as grey belt and the remainder as Green Belt.

7.6. If the sequential approach required under Paragraph 148 had been undertaken it is clear that priority should first have been given to the grey belt part of Prologis Park Ryton site, since it is also previously developed land.

7.7. Second, given our assessment of the remainder of the site as grey belt within section 6 of this submission, and that through Section 4, it has been demonstrated the proposals for the site make it a sustainable location through active travel and sustainable transport modes, it is concluded that the site is sequentially preferable to any non-grey belt locations.

7.8. It is recommended that the Green Belt Topic Paper is updated in this regard.

Appendix 1 – Assessment of Employment Land Evidence Base

Rugby Borough Council Local Plan Reg19 Publication Stage

Appendix 1: Assessment of Employment Land Evidence Base (Policy S3)

Prologis UK Ltd

04 March 2026

LICHFIELDS

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1.0 Assessment of Employment Land Evidence Base (Policy S3)

Introduction

1.1 Policy S3 sets out the amount of net employment land that is required over the Plan period 2025-2042, and the locations that are expected to deliver it. It states that 19,761.3 sqm of use class E(g)(i) and (ii) office floorspace (3.95 hectares [ha]) will be required, alongside 1,034,000 sqm (c. 287 ha) of floorspace for use classes B2, E(g) (iii), and B8. Regarding the latter requirement, the Policy states that 1,034,243 sqm of new floorspace in Use Classes B2, E(g) (iii), and B8 will be delivered, predominantly across 9 large sites, as set out in the Table below:

Table 1.1 New Floorspace to be delivered in Rugby Borough

Source	Approximate square metres of floorspace 2025-2042
Prospero Ansty and Ansty Park	26,663
Coton Park east of Castle Mound Way	26,421
Padge Hall Farm	137,730
Houlton remaining employment land	15,000
Employment planning permissions on small sites as at 1st April 2025	13,429
New Allocations under Policy S7	
Crowner Fields Farm, Ansty	275,000
Coton Park East	115,000
South West Rugby Phase 2	60,000
Ansty Park North	75,000
Land at Walsgrave Hill	290,000
TOTAL	**1,034,243**

Source: Rugby Borough Council Local Plan 2025-2042 Proposed Submission Version January 2026), Policy S3

1.2 The supporting text states that delivery in recent years has skewed towards large units with fewer smaller units for SMEs. To address this, some site allocations under Policy S7 require smaller units. It goes on to note in paragraph 1.26 that to support economic diversification of the Borough's economy and the expansion of its regionally significant manufacturing and R&D cluster, the Ansty Park north allocation under Policy S7 is ring-fenced for these uses.

Summary

1.3 The need for B2, B8 and E(g)(iii) land set out in Policy S3 is derived from the HEDNA, WMSESS, Alignment Paper, Alignment Paper Addendum and the Development Needs Topic Paper. However, the policy does not clearly articulate the objectively assessed need figure arising from that evidence base. Instead, it proceeds directly to specify a level of provision without transparently linking this back to the evidenced need. This clearly needs amending in the policy.

1.4 The evidence base against which the proposed level of provision is derived is assessed in the remainder of this section. This identifies a number of key concerns with the robustness of

the evidence base that leads to an under provision of employment land over the plan period. They main points are:

1 **A failure to fully replace 90.6 ha of supply lost at Coventry Gateway South:** The Alignment Paper Addendum accepted that the 178 ha forward supply at Coventry Gateway South had been over-estimated in the previous evidence base documents by some 90.6 ha due to the erroneous inclusion of the country park from the total area. As a result the Alignment Paper Addendum states there is now a potential requirement for up to two additional c.50 ha B8/Mixed sites and that "*taking into account the reduced years-supply in Area 7 and its highest market ranking of 'A'…it would be appropriate for at least one of these additional sites i.e. 50 ha to be apportioned to Area 7*". Whilst welcoming the acknowledgment of the error, Lichfields disagree with the failure to fully re-provide the lost 90.6 ha in Area 7. The **40.6 ha shortfall** has not been provided for elsewhere, and in our opinion is unlikely to be so. This is a clear soundness failure in RBC's evidence base and Policy S3, as the decision to re-provide only 50 ha is not justified.

2 **Failing the Duty to Co-operate by neglecting to address Coventry's Unmet Needs:** RBC states that it is contributing 2.5 ha of Coventry City's 9 ha unmet local industrial land needs. This substantially misrepresents the actual position. Coventry City Council's [CCC] Submission Draft Local Plan (September 2025) states that the residual unmet need is 45 ha. Whilst we note that CCC has put forward a pre-examination proposed modification to reduce this unmet need to 9 ha, there is no robust basis for doing so. Indeed, we have noted that a subsequent paper produced by ICENI for CCC for its local plan examination justifies the change by projecting forward a windfall figure of 2.75 ha annually. We strongly disagree with this highly unusual approach, which represents a failure of plan making and which has not been replicated elsewhere in the sub-region. CCC itself has discounted this approach in the recent past. The Coventry Local plan examination will no doubt test this approach thoroughly, but in the meantime, RBC must continue to plan for the full unmet need and contribute an additional 42.5 ha above the 2.5 ha of unmet need currently provided. Otherwise, this represents a failure both of soundness - in that the Plan is not positively prepared by declining to meet CCC's unmet need in full when in a position to do so - and also **a legal failure of the Duty to Co-operate that must be addressed**.

3 **Fundamental Flaws in the Council's employment land evidence base**: There are significant flaws in the robustness of much of Policy S3's evidence base to the detriment of the soundness of the Plan, resulting in the overall need for employment land being significantly under-estimated. Our concerns include matters such as under-providing strategic sites and forcing larger occupiers onto small sites that perform poorly relative to their needs; an excessive brownfield recycling adjustment that arbitrarily deducts 50%, or 860 ha, of need; apparent errors in the calculation of local B2/B8 needs in Rugby (whose requirement declines from 150.5 ha in the 2022 HEDNA to just 27 ha in the 2024 Alignment Paper); a failure to revisit the econometric modelling in the latter document; and a disproportionately low provision of strategic units on small sites in C&W. RBC's employment land requirement is significantly under-estimated as a result.

4 **An over-estimation of the current forward supply of sites.** Delta's analysis of the Council's forward supply of employment land suggests that three sites should be

removed from the portfolio altogether: Padge Hall Farm (1,380 sqm, or 0.39 ha @35% given RBC consider it to be strategic); Land south of A5 Watling Street (7,530 sqm / 1.88 ha @40%); and Unit 3, Imperial Road (530 sqm / 0.13 ha). **This increases the shortfall by a further 2.4 ha**.

5 **A Plan period of insufficient length.** The proposed Local Plan period runs for just 17 years, from 2025-2042. As discussed within Section 2 of this submission, it is unlikely to run for the minimum 15-year period from adoption as required by the NPPF as it would need to be adopted before 1st April 2027, which will be challenging. This points in favour of extending the plan period to at least 2045 and potentially to 2050, which is in line with the time horizons in RBC's evidence base. Extending the Plan period would increase the employment land requirement accordingly. On a pro-rata basis, the total local and strategic unmet need would increase by 24.7 ha to 2045; and by 65.2 ha to 2050. Even a 1-year addition (to 2043) would add 8.2 ha to the need.

1.5 **Collectively, these adjustments would suggest that at least another 85 ha is required to 2042, and if the plan is extended it would increase to 93.7 ha to 2043, 110.2 ha to 2045, and up to as much as 150.7 ha to 2050.**

1.6 In this regard, Policy S3 does not comply with paragraph 20 of the NPPF24, which states that plans should make sufficient provision for its and use needs, including employment.

Justification for the Scale of Need in Policy S3

1.7 The need for E(g)(iii)/B2 and B8 land set out in Policy S3 is derived from five key evidence base documents:

- The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 [HEDNA];
- The West Midlands Strategic Employment Sites Study 2024 [WMSESS];
- The Coventry & Warwickshire HEDNA - WMSESS Alignment Paper 2024 [Alignment Paper];
- The Coventry and Warwickshire Employment Needs Addendum to the Alignment Paper 2025 [the Addendum]; and
- Rugby Local Plan Topic Paper: Development Needs (December 2025) [the Development Needs Topic Paper].

1.8 Prologis previously commissioned its own evidence to review the above and ascertain if the Council's evidence fully accounted for all requirements. This work was undertaken by Lichfields and was entitled the Rugby Employment Land Needs Assessment [ELNA], dating from February 2024. The ELNA was produced to accompany Prologis's previous representations to the Rugby Local Plan Issues and Options Report (October 2023) and associated call for sites exercise relating to the potential expansion of the Prologis Park Ryton site for a range of B2 and B8 employment land uses. It pre-dates four of the five documents referred to above.

1.9 Lichfields has since re-evaluated its detailed critique of the Council's employment land evidence. It should be noted that many elements of the Council's evidence are welcomed, including frequent acknowledgement (most notably in the WMSESS) that past delivery has

been suppressed due to a lack of sites, indicating a need for greater delivery and flexibility in supply (see, for example, paragraphs 5.27 and 5.28 of that document).

1.10 It is clear to Prologis from the evidence presented that Rugby has seen significant and sustained growth in strategic employment land in recent years and demand continues to be strong. The Borough continues to be one of the most attractive locations for industrial, transport and warehousing businesses in the Coventry & Warwickshire sub-region, and it is quite correct that the emerging Local Plan continues to plan to accommodate a significant proportion of the sub-regional strategic industrial and warehousing needs in Policy S3.

1.11 Prologis welcomes RBC Officers' efforts to reconcile the various, often highly complex, employment land documents to attempt to meet the identified need for both local and strategic industrial needs. We agree that objectively speaking, the Council has interpreted its employment land need evidence in Policy S3 in a way that reflects the evidence base that has been provided. However, we retain our previous concerns that there are significant flaws in the robustness of much of that evidence base, to the detriment of the soundness of the Plan.

1.12 Our headline concerns, which affect particularly the need for local industrial and warehousing land in Rugby Borough, but also the need for strategic B2/B8 land, are summarised for the three most recent Iceni reports below:

West Midlands Strategic Employment Sites Study 2024 [WMSESS]

Headline issues with the WMSESS 2024

- **Large Units on Small Sites:** The WMSESS applies a 35% discount to the forecast strategic floorspace need for the strategic sites, to reflect that a proportion of large unit need does not have to be located on strategic sites. It then applies a 10% uplift to the figure to allow for small units on strategic sites, resulting in a net adjustment of 25%. This is problematic for a number of reasons, not least because although 36% of strategic units built from 2000 onwards were located on non-strategic sites, this was not necessarily through design, but through a lack of alternatives. **It therefore perpetuates a 'sub-optimal' situation by deliberately under-providing strategic sites and forcing larger occupiers into locations that perform poorly relative to their needs.**
- Furthermore, the approach taken by Iceni relies on 35% of the entire need coming forward on local, indigenous sites not included in the study, with 10% of smaller units coming forward on sites that are 25 ha or more. This means that 25% of the need is unaccounted for. Using the figures in Table 1.1 of the WMSESS, this means that between 770 and 838 ha of strategic B2/B8 land is required, but is not provided for in the WMSESS figures. What this means in practical terms is that the West Midlands local authorities will need to over-provide by a similar amount based on their own EDNA calculations. Only the C&W districts have attempted such an exercise to date.
- **Brownfield Recycling Adjustments:** The WMSESS states that as 2.7m sqm of floorspace is on strategic sites that were constructed before 2015, a further adjustment is needed, assuming that 50% of this older stock (1.4m sqm) will be replaced on site.

The 50% recycling figure is very high and appears entirely arbitrary. The removal of 860 ha from the need on the basis of an arbitrary assumption that is not supported by anything other than brief anecdotal evidence is a clear flaw in the model.

- Iceni has followed a different approach to calculating the level of recycling adjustment for each of its preferred scenarios (the MDST and Completions). For the MDST Model, it has effectively 'double-dipped', netting off 20% of the net B2/B8 requirement (-626 ha), and then deducting a further 30% of the pre-2015 stock (equal to 234 ha). Iceni states that this "*totals 50% overall, equivalent to 860 ha in total*". However, technically, this is not '50% overall' and compares unfavourably to its Completion scenario which has a 50% brownfield recycling adjustment of pre-2015 stock equalling 390 ha – so **470 ha lower than the MDST model.**

1.13 Ultimately, the WMESS concludes that there is a residual 'road need' of between 548 ha and 841 ha across the region to 2045. It suggests that of this need, between one and two B8/Mixed employment sites of 50 ha could be provided in the Area 7 Corridor which is located in Rugby / Coventry and a further 1-2 sites for E(g)/B2 in Opportunity Area 7 (see Table 1.2):

Table 1.2 Indicative Site Distribution by Opportunity Area 7 (ha)

	Notional supply – year					Market Rank	Indicative Phasing	Indicative additional strategic site requirement	Narrative
	Type	0-5	5-10	10-15	15-20				
Opportunity Area 7: M6 / A45 / A46 / M45 Coventry & Rugby	B8 / Mixed					A	C/D	1-2	Large OA. Highest Existing Supply. High demand location. Part GB constrained OA. Supply requirement later in study period.
	E(g) / B2						C/D	1-2	Highest existing supply although Coventry Airport is a single occupier site that may shorten supply period. Further supply at Ansty Park. Potential to attract further investment.
West Midlands total	B8 / Mixed							**10-16 (500-800 ha)**	
	E(g) / B2							**3-7 (75-175 ha)**	

Source: WMSESS (Table 10.8) *Includes -20% recycling adjustment.

1.14 However, the WMSESS caveats these findings as follows:

"*To assist in guiding the apportionment of need by OA, a high level exercise has been undertaken to balance current commitments against past-take up rates, market attributes and other considerations of opportunity areas. This exercise is indicative as it will be for the Local Plan making process to identify the scale, suitability and achievability of sites and therefore the 'apportionment' strategy here is intentionally simplistic and high level*" [paragraph 1.31].

1.15 Despite this very clear caveat, no subsequent critique has been applied to the Opportunity Areas' strategic sites breakdown either by Iceni (in its December 2024 Alignment Paper) or the constituent Councils. This is despite the WMSESS praising the considerable virtues of the local commercial property market in Rugby / Coventry in its overview of Area 7, which the proposed Prologis Park West site sits squarely within:

"*Coventry and Rugby continue to be the key markets in the Midlands and continue to see high levels of demand and resulting take up. The market is positioned firmly within the 'Golden Triangle' with immediate access to the M6/M1 interchange…rents achieved are some of the highest in the Midlands market and developable land in the short term is reducing quickly*" [paragraphs 12.38 and 12.39].

Coventry & Warwickshire HEDNA - WMSESS Alignment Paper 2024

Headline issues with the Alignment Paper (2024)

1.16 As noted in our Regulation 18 representations, we have a number of concerns with how the Alignment Paper calculates its 'local' industrial land need for C&W in particular. This essentially relies on trending forward past completions in a similar manner to Iceni's 2022 HEDNA, but using four more years' worth of completions data (so 12 rather than 8 in the HEDNA). It also claims that it has removed 'strategic' units over 9,000 sqm from the trend.

1.17 As can be seen from a comparison of the data in Table 1.3, the difference is very pronounced overall, with the HEDNA projecting a need for 622 ha between 2021 and 2041, compared to just 365 ha in the Alignment Paper. The difference is accentuated by 2050, where the local industrial need in the HEDNA is more than double the Alignment Paper's figure. **Indeed, the resultant figures are completely different for every district, but particularly for Rugby, which sees its requirement decline from 150.5 ha to just 27 ha to 2041**. This has a profound suppressive impact on the requirement ultimately taken forward in Policy S3.

1.18 Aside from the addition of 4 more years' worth of monitoring data, the Alignment Study claims that this is due to the removal of big box units from the completions trend:

"the previous HEDNA estimated the need for Strategic B8 (all big box units), whereas WMSESS forecasts the need for both strategic B2 and B8 and focuses on sites rather than units" [paragraph 3.24].

1.19 However, the 2022 HEDNA makes it very clear that B8 strategic completions were also deducted from its analysis before a localised industrial/warehousing figure was calculated. It is difficult to understand how the difference could be so pronounced for Rugby without there being a fundamental error in the data (either in the HEDNA or the Alignment Paper).

Table 1.3 Indicative Site Distribution by Opportunity Area 7 (ha)

	2021-2041		2021-2050	
	HEDNA	Alignment Paper	HEDNA	Alignment Paper
Rugby	**150.5**	**27.0**	**218.2**	**31.4**
North Warwickshire	56.1	19.8	81.4	23.0
Nuneaton & Bedworth	45.5	36.7	66.0	42.5
Coventry	147.6	85.6	214.0	99.3
Stratford	166.1	124.7	240.9	144.6
Warwick	56.2	71.5	81.4	82.9
Total	**621.9**	**365**	**901.8**	**424**

Source: Alignment Paper (2024), Table 3.5 / HEDNA 2022, Tables 11.2 and 11.3.

1.20 **The Alignment Paper also limits itself by focussing entirely on past trends to identify future needs, rather than revisiting the modelling in the original 2022 HEDNA's other scenarios such as the VOA comparison and Labour demand needs** (Iceni previously used Cambridge Econometrics in 2022). Had it done so, Iceni may have concluded that the need for B2/B8 land could be considerably greater due to the rapid growth (and strong future growth prospects) of warehousing in particular.

1.21 Our other main areas of concern relate specifically to the calculations for strategic B2/B8 need across C&W, and how the WMSESS recommendations have been taken forward.

1.22 Firstly, the Alignment Paper errs by adjusting the industrial land need for 2022-45 back to 2041 by simply pro-rata'ing the requirement and adding another year. A more robust approach would have involved calculating the overall need for that additional year and then netting off the completions in 2021/22. This ultimately results in Iceni double-counting the supply by deducting a further 30 ha from the requirement.

1.23 Secondly, the Alignment Paper takes a different approach to identifying a proportion of strategic need on smaller sites. The WMSESS essentially deducted 35% of the net requirement for strategic sites, then added back on 10% to represent smaller units on strategic sites - so a 25% negative adjustment overall. Therefore, across the West Midlands, Iceni expected some 1,174 ha (3,354 x 35%) to be delivered on smaller sites. If the 25% net figure is taken forward on the basis that the Councils' HEDNAs will have over-estimated the need (given that 10% of small units are expected to come forward on strategic sites), this still means that an additional 839 ha (3,354 x 25%) needs to be found across the West Midlands.

1.24 Even including a margin, Table 3.7 of the Alignment Paper makes provision for just 148 ha of strategic units on small sites to 2045 (derived using a different methodology) - just 18% of the overall 839 ha figure. This is low, given that the indicative land need for 2022-45 in C&W is identified as being between 200-375 ha out of a need for 575-975 ha across the entire West Midlands (see Table 1.2 in the WMSESS).

1.25 In basic terms, Iceni suggests that C&W has between 35% - 39% of the overall unmet need across the West Midlands for strategic B2/B8 to 2045, but the same sub-region has only 18% of the total share of the 'strategic units on small sites' allowance. Even if the lower end of the 35%-39% share was applied to the 839 ha figure, this would still suggest that 294 ha would need to be added to the additional strategic site requirement in C&W, almost double the 148 ha identified in Table 3.8 of the Alignment Paper to 2045.

1.26 Thirdly, the Alignment Paper apportions the need for big box units on non-strategic sites, based on their proportion of all industrial completions. This is then added to the local industrial need to come to an overall industrial need in Table 3.9.

1.27 However, the percentages of all industrial gross completions in Table 3.8 do not appear to have been applied correctly to the total need across C&W, with the result that the figures for each district are incorrect. As can be seen from Table 1.4, if the correct apportionment is applied, then the figures for both Rugby and North Warwickshire are higher across each timeframe, whilst the reverse is true for the remaining four districts. As can be seen below, Rugby's need should be 1.0 ha higher between 2021 and 2041; 1.1 ha higher to 2045 and 1.4

ha higher to 2050.

Table 1.4: Local Industrial Needs Position. Errors in the apportionment of Local Big Box Need

	% of all industrial gross completions	Apportionment of Local Big Box (Alignment Paper Table 3.8)			Correct Apportionment of Local Big Box		
		2021-41	2021-45	2021-50	2021-41	2021-45	2021-50
Rugby	**25.5%**	**31.4**	**36.6**	**42.7**	**32.4 (+1.0)**	**37.7 (+1.1)**	**44.1 (+1.4)**
North Warwickshire	33.2%	40.5	47.2	55.1	42.2 (+1.7)	49.1 (+1.9)	57.4 (+2.3)
Nuneaton & Bedworth	3.5%	4.5	5.3	6.2	4.4 (-0.1)	5.2 (-0.1)	6.1 (-0.1)
Coventry	13.9%	19.3	22.5	26.3	17.7 (-1.6)	20.6 (-1.9)	24.0 (-2.3)
Stratford	14.9%	19.5	22.7	26.6	18.9 (-0.6)	22.1 (-0.6)	25.8 (-0.8)
Warwick	9.0%	11.8	13.7	16	11.4 (-0.4)	13.3 (-0.4)	15.6 (-0.4)
Total	**100.0%**	**127**	**148**	**173**	**127**	**148**	**173**

Source: Alignment Paper (2024), Table 3.8 / Lichfields analysis

1.28 This has a knock-on effect for all subsequent tables in the Alignment Paper. If applied correctly, then the residual unmet local industrial need for Rugby Borough (deducting a forward supply of 5 ha) would increase to between 54.4 ha and 75.9 ha.

Table 1.5: Local Industrial Needs Position. Errors in the apportionment of Local Big Box Need for Rugby Borough

Rugby	Apportionment of Local Big Box (Alignment Paper Table 3.8)			Correct Apportionment of Local Big Box		
	2021-41	2021-45	2021-50	2021-41	2021-45	2021-50
Total Local Industrial Need	58.4	68.0	79.5	59.4	69.1	80.9
Residual Industrial Need (deducting supply of 5 ha)	53.4	63.0	74.5	**54.4**	**64.1**	**75.9**

Source: Alignment Paper (2024), Table 3.9 / Lichfields analysis

Coventry and Warwickshire Employment Needs Addendum to the Alignment Paper 2025

Headline issues with the Addendum 2025

1.29 Iceni was commissioned by RBC to review a number of technical representations received as part of their Regulation 18 consultation on its emerging Local Plan relating to employment land issues.

1.30 Of particular note, Iceni stated that the WMSESS 2024 included 178 ha of supply at Coventry Gateway South. However, as this site was revealed to contain a substantial country park, the actual development area of the site was 87.4 ha. **Therefore, there was a material inflation of the strategic sites supply within the WMSESS, equivalent to 90.6 ha**. Iceni agreed that it would be appropriate to adjust the commitments figures in the WMSESS on this basis.

1.31 The effect of including only the developable area within the supply (87 ha), rather than the total site area, reduced the total WMSESS commitments of 1,305 ha by 90 ha, to 1,215 ha. This in turn, increased the total WMSESS strategic sites shortfall by 90 ha. This

adjustment to the overall West Midlands strategic sites residual need increases from 615 ha – 977 ha, to **705 ha - 1,067 ha**.

1.32 The Addendum noted that as the WMSESS apportioned a residual need, after committed supply has been accounted for, there was no straight forward mechanism to update the apportionment for all opportunity areas if assumptions to the committed supply (as of April 2022) changes. **For Coventry and Warwickshire, Iceni considered that the lost 90 ha supply should relate to Area 7, which reduced that area's B8/Mixed supply from 322 ha to 232 ha.**

1.33 Iceni noted that in the context of an additional 90 ha of additional residual need, there was a potential requirement for **up to two additional B8/Mixed sites of a notional 50 ha** to be apportioned to meet the highest end of the needs range; however the higher end of the supply recommendations in WMSESS Table 12.2 continued to meet the lower end of the range.

"As acknowledge above, it is not straightforward to update the apportionment exercise undertaken within the WMSESS for the C&W study area on its own. However, taking into account the reduced years-supply in Area 7 and its highest market ranking of 'A' (as shown in WMSESS Table 12.2), it would be appropriate for ***at least one of these additional sites i.e. 50ha to be apportioned to Area 7****. We would recommend that additional land is sought to provide for a further 50 ha of supply on strategic sites as a minimum in Area 7".*

1.34 With an additional strategic site requirement of 50 ha in Area 7 (increasing that area's indicative land need from 50-100 ha up to 100-150 ha), **there was an updated residual need for 250 to 425ha of strategic sites across the Coventry & Warwickshire sub-region 2022-2045.** By pro-rata'ing this up another year (2021-2045) and deducting 30 ha of completion in 2021-2022, Iceni concluded that the total residual strategic sites need between 2021-45 was **between 231 and 413 ha** (up from 179-361 ha in the Alignment Paper).

1.35 To this figure, Iceni adds the total C&W strategic site commitments, of 565 ha (down from 656 ha in the WMSESS due to the removal of 90 ha at Coventry Gateway South) to come to a Total Strategic Sites Need of between **796 ha and 978 ha**. Overall, the gross need has actually reduced compared to the 2024 Alignment Paper which indicated a gross strategic sites need for 835 – 1,017 ha.

1.36 Taking account of 64ha at Padge Hall Farm (permitted December 2023) and 2 ha at Lyons Park (not previously included in WMSESS supply) the residual strategic sites need is as follows (updating para 4.11 Alignment Paper 2024):

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

1.37 Whilst it is welcome that Iceni has accepted the error in including the whole of the Coventry Gateway South and reduced the forward supply of strategic sites by 90 ha, the adjustment paradoxically reduces the Total Strategic Sites Need from 835 – 1,017 ha, to 796 – 978 ha

overall (even though the need in Area 7 has increased by 50 ha). This is due to an error in Iceni's latest calculations.

1.38 Setting this to one side, for no reason that is obvious in the Addendum, Iceni has concluded that although the strategic supply in Opportunity Area 7 Rugby and Coventry has fallen by 90.6 ha, it should only be replaced by an upwards adjustment in the overall unmet need by 50 ha – resulting in a 40.6 ha shortfall.

1.39 At the residual strategic sites level, the unmet need increases by c.50 ha for Coventry & Warwickshire, from 136-311 ha to 184-359 ha. We are unclear why Iceni did not simply increase the residual need figure by the full 90.6 ha in Area 7, which is where Coventry Gateway South is located, rather than the notional 50 ha increase.

1.40 **For this reason alone, the strategic need for B8/Mixed land in Opportunity Area 7 (which given Coventry City's land constraints, effectively means Rugby Borough) should be increased by at least 40.6 ha.**

1.41 It is relevant to note at this point that the proposed Prologis Park West site is located immediately to the east of the Coventry Gateway South site. It would clearly serve the same commercial property market and address much of Coventry City's unmet needs; its allocation would be logical and more than compensate for the loss of so much of Coventry Gateway South from the forward supply.

Concerns applicable to all Employment Land documents informing Policy S3

Demand-side

1.42 Bringing this all together, in terms of the resulting requirement for strategic employment land, the evidence base has significantly underestimated the scale of employment land needed across both Rugby and the sub region and more generally. The modelling applies inconsistent approaches across the three reports and introduces some very significant assumptions, such as the 50% recycling allowance and 35% big box on small sites adjustment. **These are unsupported by the evidence and would lead to perverse outcomes**, notably forcing big box warehousing on small sites away from the strategic road network.

1.43 The outcome of all of this analysis is that Rugby Borough, a part of the country at the very heart of our logistics and advanced manufacturing network, apparently requires as little as 63 ha of local industrial land and 59-134 ha of strategic land to 2045 (based on the Alignment Paper), figures out of line with both past delivery rates and future prospects. The latter figure in particular is based on what essentially amounts to an indicative exercise that in the words of the report's authors (in the WMSESS, paragraph 1.31) is "*intentionally simplistic and high level*". It goes on to note that "*It is **not** the intention that the junction / area capacity testing work be used to guide the Local Plan strategy, because of the simplistic methodology used and the need to evaluate locations on their merits as part of a wider range of factors*" [paragraph 1.26].

1.44 Furthermore, the evidence base neglects the specific needs of strategic logistics and fails to model this key sector's needs on an individual basis, wrapping up the requirement

alongside B2 industrial. It does not align with the NPPF's specific requirement to pay particular regard to facilitating development to meet the needs of freight and logistics.

1.45 **In particular, the failure to fully replace the loss of 90.6 ha at Coventry Gateway South in Opportunity Area 7 is a major flaw in the Plan going forward.**

Coventry's Unmet Needs

1.46 A linked point relates to Coventry City's unmet need. As set out in RBC's Development Needs Topic Paper:

"*It is understood that of its 2021-2041 requirement for industrial land on smaller sites Coventry City Council is unable to meet 9 hectares or 36,000 square metres. This unmet need could in principle be met in any of the Functional Economic Market Area (FEMA) authorities of North Warwickshire Borough, Nuneaton and Bedworth Borough, Rugby Borough, Stratford-on-Avon District or Warwick District.*

The planned amount of floorspace of 540,000 2025-2042 would exceed the combination of the net Rugby Borough local need and opportunity area 7 strategic need to 2042 (529,882sqm) by just over 10,000sqm. This indicates that the publication Local Plan could in principle contribute 10,000sqm/2.5ha to meeting Coventry City Council's unmet local industrial land need in addition to meeting the opportunity area 7 strategic need to 2042." [paragraphs 3.34-3.36]

1.47 RBC's approach is simply to suggest that by over-allocating 10,000 sqm, or 2.5 ha Borough-wide, this can be netted off Coventry's unmet need of 9 hectares or 36,000 sqm. This does not comprise a robust analysis of the extent to which RBC could provide more of Coventry's needs, given the Borough directly abuts Coventry City and would be ideally placed to take on a much larger responsibility for that City's future growth prospects.

1.48 Furthermore, it is our view that the 9 ha of unmet need identified for Coventry City substantially misrepresents the actual position and the scale of additional land actually required in the area.

1.49 For example, Coventry City Council's new Local Plan was submitted to the Secretary of State on 9th September 2025 for independent examination by the Planning Inspectorate.

1.50 Paragraph 5.19 of the Submission draft Local Plan (2025) states that:

"*In terms of remaining local employment needs excluding office provision 60 hectares for local need can be accommodated taking into account supply, completions and allocations,* ***leaving a residual need of 45 ha.*** *The city is unable to meet its need in full which has already been highlighted through Policy DS1 and reflects the importance of the Duty to Co-operate in ensuring the employment land needs of the sub region are met.*"

1.51 This 45 ha shortfall is re-stated in Coventry City Council's Duty to Co-operate Compliance Statement (Submission) (September 2025):

1.52 "*The total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. From this Coventry had a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware*

through the Duty to Co-operate discussions that it has a shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being promoted but that it has been rejected through site assessment." [paragraph 4.10]

1.53 The Compliance Statement goes on to note that Coventry City Council considers that it cannot meet its residual need of 45 hectares to 2041 and is requesting assistance from partners across the FEMA to help meet its Local Employment Need shortfall. "*However, the extent of this shortfall has not yet been agreed with partners and has been subject to challenge by other FEMA authorities. The detailed extent of agreement and disagreement will be set out in Statements of Common Ground with the relevant FEMA authorities*" [page 178].

1.54 We understand that subsequent to this, Coventry City Council has put forward a pre-examination proposed modification to reduce this unmet need to 9 ha. However, there is no robust basis for doing so. Indeed, we note that CCC commissioned Iceni to produce the *Coventry Local Plan Review Employment Windfall Paper*, which was issued in November 2025. This document was prepared to consider whether there was a justification for a windfall allowance for employment land in the Coventry Local Plan Review, and to consider (where appropriate) what the windfall allowance would be. It relates specifically to the provision of industrial land.

1.55 In brief, Iceni re-iterated its previous findings that the local need for industrial and warehousing and was 105 ha, with a forward supply of 60.2 ha of allocations or existing commitments/completions, hence a 45 ha shortfall. The Windfall Paper argues that because 3.9 ha per annum over the past decade has been delivered on non-allocated, or windfall, sites, then this potential supply should be netted off the future requirements. Iceni alights on a windfall figure of 2.75 ha annually, which equates to 3.9 ha p.a. discounted by 30% for uncertainty. Iceni then trends this forward by 13 years and concludes that an allowance for windfalls of **35.8 ha** should be made over the plan period. When netted off the 45 ha shortfall, this leaves an unmet need of 9 ha.

1.56 Whilst this is an approach that is often used for housing land supply calculations, the situation is very different for employment land, and particularly for industrial and warehousing sites which can be of a completely different order of magnitude. Housing windfalls can be included from as little as 1 dwelling, whilst the Council is now suggesting that 27,500 sqm of employment land could come forward in an unplanned manner every year over the full Plan period.

1.57 Whilst the 45 ha unmet need is said to relate to 'local needs', the calculation already factors in over 20 ha of provision for big box completions on non-strategic sites. This is problematic given that the strategic need calculations in the earlier WMSESS already assumes that 50% of older stock will be replaced on site, and deducts 860 ha from the overall need on this basis. They are effectively 'double-dipping' by assuming that a proportion of the residual need can again be delivered on existing sites.

1.58 This is an unusual approach, and not one that Iceni is recommending for the other Coventry and Warwickshire authorities.

1.59 Similarly, Coventry City Council in the recent past has also discounted this approach. As recently as November 2024 in its '*Housing and economic land availability assessment*', which forms part of the evidence base for its emerging plan, it has this to say on employment land windfalls:

"*Given the nature of employment land availability and constraints, employment windfall sites are unlikely to come forward in large numbers and are difficult to forecast. Therefore, no windfall allowance is included for employment land.*" [paragraph 3.77]

1.60 Whilst the emerging Regulation 19 proposed Submission Coventry Local Plan has Policy JE5: Industrial and Storage / Distribution Development which acknowledges that proposals may come forward on other non-allocated sites within the city for these uses, the Policy makes it clear that "*The Council's preferred location for new industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2".*

1.61 Policy JE5 sets out the circumstances by which proposals for new industrial and storage/distribution development on unallocated sites would be permitted, but these are onerous and include the applicant having to demonstrate that:

- They are accessible by a choice of means of transport or will be made accessible;
- They have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
- They would not significantly compromise the viability or deliverability of l and allocated in this Plan for employment development; and
- They would be compatible with other Plan Policies.

1.62 In addition to the above, proposals for new general industrial and storage/distribution development on all sites will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution, whilst B8 uses would need to include HGV parking and overnight facilities, electric vehicle charging and consolidation facilities.

1.63 We consider that in light of this uncertainty, Coventry should identify sufficient employment sites to meet its needs in full; if it cannot do that, as seems to be the case, then it should work with its neighbours in the FEMA to ensure this unmet need can be met in full elsewhere. Rugby would be the ideal location for this and should take on a significantly higher share of Coventry's unmet need than the notional 2.5 ha, and potential as much as 45 ha given the strength of the industrial property market in Rugby.

1.64 **The Coventry Local plan examination will no doubt test this approach thoroughly, but in the meantime, RBC must continue to plan for the full unmet need and contribute an additional 42.5 ha above the 2.5 ha of unmet need currently provided. Otherwise, this represents a failure both of soundness - in that the Plan is not positively prepared by declining to meet CCC's unmet need in full when in a position to do so - and also a legal failure of the Duty to Co-operate that must be addressed.**

1.65 Given that the proposed Prologis Park West site immediately abuts the Coventry boundary and would likely attract a considerable number of Coventry residents to work there should it come forward, it would be the obvious solution to address Coventry's unmet needs in full.

Supply-side

1.66 On behalf of Prologis, Delta has undertaken an analysis of RBC's forward supply as set out in Appendices 3 and 4 of the Council's Development Needs Topic Paper (December 2025). In appendix 4, the Council concludes that it has a total commitment of 480,814 sqm of strategic employment floorspace in the pipeline, equal to 137.38 ha at a plot ratio of 35%.

1.67 We consider that not all of these sites would comprise 'strategic' on the basis of the generally accepted threshold of a 'large' site as being at least 9,000 sqm in size (see for example paragraph 3.47 of the Development Needs Topic Paper). The Council has included the following as strategic sites, and effectively netted these off the strategic need for industrial and warehousing uses, whereas given the size of these units we consider that they should be more readily seen as addressing the local requirement:

- **Plot 8, Prospero, Ansty** (ref: R23/0727), **3,234 sqm** of B8 floorspace: Plot completed and occupied by JD Logistics.
- **A5 Watling Street**, Clifton upon Dunsmore (Rugby Radio Station site) (ref: R17/0022), **15,000 sqm**; Condition 50 restricts unit sizes of B8 to less than 5,000 sqm in size (effectively mid-box rather than strategic needs).
- **Padge Hall Farm**, Watling Street, Burbage (R24/0257), **1,380 sqm;** Erection of a Vehicle Maintenance Unit (VMU), as an ancillary development within the yard area of the Unit 1 building (B8 use).
- **Land off Viggen Way**, Ansty Park (R22/0861), **4,715 sqm**; Full planning permission for industrial building;

1.68 **These four sites total 24,329 sqm** which should be re-identified as sites meeting a local, rather than a strategic need in the Council's calculation, thus reducing the Strategic supply by 6.95 ha (at a plot ratio of 35%). Padge Hall Farm should also be removed from the forward supply entirely given that it represents an ancillary maintenance unit within an existing storage yard. At a plot ratio of 40% (the Council's standard approach to translating local industrial floorspace to land), this would increase the local supply by 6.08 ha.

1.69 Furthermore, there are two local employment sites in the Council's supply that should be removed from the portfolio. These comprise:

- **Land south of A5 Watling Street**, adj to M69 Jct 1(R20/0422), **7,530 sqm**. A more recent permission for Service Station (R23/1047) supersede previous employment proposal;
- **Unit 3, Imperial Road, Ryton-on-Dunsmore, Coventry** (R24/0676), **530 sqm**. This comprises the erection of an extension for a temporary Modular Prep & Spray Booth.

1.70 Removing these two sites, plus Padge Hall Farm, from the overall supply would further reduce it by **-9,440 sqm, or 2.4 ha** (at a plot ratio of 40%), requiring a commensurate uplift in provision.

Employment Land Implications of changing the Plan period

1.71 The proposed Local Plan period runs for just 17 years, from 2025-2042. However, it is unlikely to run for the minimum 15-year period from adoption as required by the NPPF as it would need to be adopted before 1st April 2027, which will be challenging.

1.72 This points in favour of extending the plan period to at least 2045 and potentially to 2050, which is in line with the time horizons in RBC's evidence base. Extending the Plan period would increase the employment land requirement accordingly.

1.73 The Development Topic Paper (2025) simply took the strategic employment land need of 134 ha to 2045, and pro-rata'd this down to 116.5 ha by modelling 20 years (2022-2042) rather than 23 (2022-2045).

1.74 If the Plan period were to be extended by 1 year to 2043 (to ensure NPPF compliance), then the strategic requirement would increase on a simple pro-rata basis to 122.3 ha (+5.8 ha); if extended to 2045, it would revert back to 134 ha (+17.5 ha) and if extended to 2050 it would increase to 163 ha (+46.5 ha). Taking a similar approach for local industrial needs would increase the requirement by 2.4 ha to 2043; by 7.2 ha to 2045; and by 18.7 ha to 2050.

1.75 **Combined, the total local and strategic unmet need would increase by 8.2 ha to 2043; +24.7 ha to 2045; and +65.2 ha to 2050.**

Summary

1.76 For the reasons set out above, we consider that Policy S3 does not accurately reflect the true level of need for either local or strategic B2/B8 employment land in Rugby Borough, which we consider to be significantly higher.

1.77 Collectively, the adjustments would suggest that at least another 85 ha is required to 2042, and if the plan is extended it would increase to 93.7 ha to 2043, 110.2 ha to 2045, and up to as much as 150.7 ha to 2050.

1.78 Prologis considers that selecting the right site in the right location, and with the right characteristics, is essential to ensuring successful delivery and realising the benefits of development. The proposed extension to the highly successful Rugby Ryton site could deliver the NPPF's requirements and help to secure significant economic benefits for the area whilst addressing in full the unmet needs of Coventry City.

Appendix 2 – Comparative Heritage Assessment of Walsgrave Hill and Ryton West

Rugby Local Plan Proposed Submission Draft

Comparative heritage assessment of Walsgrave Hill and Prologis Park Ryton West Mountpark

794-PLN-HER- 02252
V2
March 2026

Document status					
Version	**Purpose of document**	**Authored by**	**Reviewed by**	**Approved by**	**Review date**
1	Draft	JD	SM	SM	05.03.2026
2	Final	JD	SM	SM	09.03.2026

Approval for issue		
Simon Mortimer	[redacted]	09.03.2026

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1 Executive Summary

1.1 This document has been prepared by Tetra Tech RPS for Delta Planning to appraise the heritage sensitivities of two proposed employment sites that have been promoted in the current Rugby Borough Council Review. The sites are Prologis Park Ryton West and Mountpark (ref 328) and Land at Walsgrave Hill (ref 121).

1.2 In preparing this assessment a site visit has been made in March 2026 to both sites (from public rights of way) to make an independent assessment of potential setting considerations. A review has also been made of documents submitted in support of each scheme to the Local Plan Review and information previously submitted, including the Inspectors comments from the Adopted Local Plan and Historic England's consultee comments on the Adopted Local Plan and the current Local Plan process.

1.3 Roughly two-thirds of what is now proposed for Employment uses (including B2 & B8) within the Land at Walsgrave Hill site was put forward in the last local plan (Rugby Borough Local Plan: 2011-2031, now adopted) for residential development but not selected. In the emerging local plan, the Red line area of Land at Walsgrave Hill site has been increased and the masterplan now includes a country park/landscaped buffer to the south, along the boundary with the Grade II* Registered Park of Coombe Abbey.

1.4 Prologis Park Ryton West and Mountpark, near Ryton-on-Dunsmore was identified as draft employment allocation during the Regulation 18 Preferred Options stage but has been removed and replaced by Land at Walsgrave Hill in the Regulation 19 Plan submission. It has been replaced because of perceived highways impacts to A46/Tollbar End junction, not due to heritage reasons.

1.5 It is clear from a comparison of the heritage constraints posed by the development of both sites, that on heritage grounds – the Prologis Park Ryton West and Mountpark site could be developed with no, or worst case very limited/negligible impacts to any designated heritage assets. By contrast the location of the Land at Walsgrave Hill site means that it provides the last vestige of an undeveloped buffer between the Grade II* Registered Park and Garden and the urban extents of Coventry. The undeveloped nature of the site protects what remains of the tranquil setting of the RPG and also the Grade II farmhouse that falls within the proposed development area. In seeking to move the employment units north to provide a buffer to the RPG the effect is to surround the Grade II farmhouse with large scale urbanising development – resulting in harm to the farmhouse at the very higher end of less than substantial harm. Allied with the moderate to high degree of harm to the RPG it is recommended any decision maker be sure that they have accounted for weight to be afforded to this harm in their assessment. It is difficult to see how the needs case for development of the Land at Walsgrave Hill site outweighs the heritage harm – when the Prologis Park Ryton West and Mountpark site is available and developable.

2 Legislative and Planning Policy Framework

2.1 The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'.

2.2 The NPPF defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically identified by Local Planning Authorities (LPAs) and incorporated into a Local List and/or recorded on the Historic Environment Record.

2.3 As defined in the Glossary to the National Planning Policy Framework and by the Planning Policy Guidance (PPG), heritage interests include:

- archaeological interest: there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- architectural and artistic interest: these are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- historic interest: an interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

Legislation

2.4 Where development subject to planning control may affect the significance of listed buildings and conservation areas, there is a legislative framework to ensure proposed works are developed and considered with due regard to the impact upon their significance. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990 (in particular, Sections 16, 66, and 72). The Act requires that special regard, or special attention, be given to the preservation of listed buildings and their setting, or to preserving or enhancing the character and appearance of conservation areas. Section 72, relating to conservation areas, is only engaged in relation to development *within* such an area, it affords no statutory weighting to change within their setting.

2.5 The meaning and effect of these duties have been considered by the courts, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137. The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give '*considerable importance and weight*' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

2.6 Importantly, preservation does not mean that change is not possible; it specifically means no harm, as confirmed by the case of *South Lakeland DC v SSE & Carlisle Diocesan Parsonages Board,* [1992] 2 WLR 204, [1992] 2 AC 141. This is echoed in Historic England's *Managing Significance in Decision-Taking in the Historic Environment: Historic*

Environment Good Practice Advice in Planning 2 (2015), which states that '*change to heritage assets is inevitable but it is only harmful when significance is damaged*'.

2.7 Assessment of heritage impact is not limited to identifying harm, and it is incumbent that impacts which enable preservation, and those which enhance are also given great weight by the decision maker. The case of *Kenneth Kay v SSGCLF and Ribble Valley Borough Council*, [2020] EWHC2292 (Admin), 21 August 2020, makes clear that any heritage benefits should be expressly included and referred to as public benefits.

National Planning Policy

National Planning Policy Framework (Department for Levelling up Housing and Communities, December 2024)

2.8 NPPF Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are 'an irreplaceable resource and should be conserved in a manner appropriate to their significance'.

2.9 Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a **manner appropriate to their significance**, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

2.10 Paragraph 203 states that: Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: d) **the desirability of sustaining and enhancing the significance of heritage assets**, and putting them to viable uses consistent with their conservation; e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; f) the desirability of new development making a positive contribution to local character and distinctiveness; and g) opportunities to draw on the contribution made by the historic environment to the character of a place.

2.11 Under 'Considering potential impacts' paragraph 212 states that **'great weight'** should be given to the conservation of designated heritage assets (and **the more important the asset, the greater the weight should be**), irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets. The NPPF defines 'conservation' in the context of heritage policy to mean: 'the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance'.

2.12 Where less than substantial harm is identified paragraph 215 requires this harm to be weighed against the public benefits of the proposed development, including, where appropriate, securing the heritage asset's optimum viable use.

2.13 Paragraph 216 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.

2.14 Paragraph 219 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. It also states that proposals that preserve those elements of setting that make a positive contribution to, or better reveal the significance of, a heritage asset should be treated favourably.

National Guidance

Planning Practice Guidance (DCLG)

2.15 The Planning Practice Guidance (PPG) has been adopted to aid the application of the NPPF. The recent High Court decision ('Mead') iterated that the PPG and the NPPF are to be read and applied as a whole, being mindful that one may modify the other (*Mead Realisations Ltd v Secretary of State for Housing Communities and Local Government and another* [2025] EWCA Civ 32). Both are statements of national policy issued by the Secretary of State, and there should be no legal distinction between them. In relation to heritage, PPG reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.

2.16 Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases. It also states that that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

2.17 Paragraph 18 of the PPG states that within each category of harm (which category applies should be explicitly identified – substantial or less than substantial harm), the extent of the harm may vary and should be clearly articulated. In common practice, harm is often articulated with reference to a spectrum (for example, 'at the lower end of the spectrum of less than substantial harm', 'at the highest end of less than substantial harm').

Overview: Historic Environment Good Practice Advice in Planning

2.18 Historic England have published a series of documents which provide guidance on managing change within the historic environment. These include Historic Environment Good Practice Advice in Planning (GPAs) documents and Historic England Advice Notes (HEANS). Such documents underpin conservation practice in England.

2.19 The most relevant to this assessment include:

- GPA1: The Historic Environment in Local Plans (2015)
- GPA2: *Managing Significance in Decision-Taking in the Historic Environment* (2015)
- GPA3: *The Setting of Heritage Assets* (Second Edition; 2017)
- HEAN7: *Local Heritage Listing: Identifying and Conserving Local Heritage* (Second Edition, 2021)
- HEAN12: *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (2019)

3 Prologis Park Ryton West and Mountpark

Location & site description

3.1 Grid reference: 437243, 274098

3.2 The site is a broadly triangular land parcel between Middlemarch Business Park and A423, South East of Coventry which lies beyond the A46. There are no designated heritage assets within the Site boundary which is currently used for mixed purposes chiefly agriculture, and Storage and Distribution on part of the site.

Baseline of designated heritage assets

3.3 The following baseline is established from designated heritage assets within 1km of the Site and those shown within the Zone of Theoretical Visibility (ZTV) (Figure 3).

Asset Name	National Heritage List Entry number	Designation	Distance from Site
Ryton Bridge	1034899	Listed Building, Grade II	75m North
Pit alignments N of Bubbenhall village	1005718	Scheduled Monument	180m south west
Bubbenhall Conservation Area	N/A	Conservation Area	750m south east
Abbey's House	1035230	Listed Building, Grade II	885m south west of the site
Yew Tree Farmhouse	1115675	Listed Building, Grade II	1km south west of the site
Malt Shovel Public House	1035231	Listed Building, Grade II	1km south west of the site
Ryton House	1034887	Listed Building, Grade II	950m east of the site
Ryton House	1001343	Registered Park and Garden, Grade II	950m east of the site
Prehistoric pit alignments and associated features 160m north of The Barbellows	1020034	Scheduled Monument	2.2km east of the site
Church of St John the Baptist	1116539	Listed Building, Grade I	2.2km north east of the site

Baseline of non-designated heritage assets

Asset Name	National Heritage List Entry number	Designation	Distance from Site
Barn at Coney Grey Farm	N/A	Potential non-designated Heritage asset	Within the Site

Total number of assets

	Scheduled Monuments	Registered Parks and Gardens	Listed Buildings			Total Listed Buildings	Conservation Area
			Grade I	Grade II*	Grade II		
Within the site	0	0	0	0	0	0	0
Within the 1km search area	2	1	1	0	2	3	1

Assessment of Potential Impacts

3.4 There are no designated assets within the site, so there would be no direct harm to designated heritage assets.

3.5 The Listed Buildings within the Conservation Area are contained within built form and share no experience with the Site, as a result the Site does not form part of their setting and there will be no impacts.

3.6 Ryton Bridge Scheduled Monument. Any impacts are likely to be neutral or minor adverse provided development does not materially alter key local views from public rights of way or intrude into the immediate landscape context of Ryton Bridge. The Bridge's setting is already heavily affected by road infrastructure and The Site's contribution to understanding the Bridge's significance is minor and so harm is not expected to exceed, as a worst case, a low level of less than substantial harm.

3.7 Scheduled Monument 'Pit alignments N of Bubbenhall village' – these are buried remains of a late Bronze Age/early Iron Age boundary feature – probably located to deliberately reference the River Avon. Setting does not make a significant contribution to the significance of this asset and the Site makes little contribution to its setting. Any impact is therefore assessed to be at the very lowest extent of less than substantial harm.

3.8 The proposed development could interrupt the agricultural context of the Conservation Area and intrude into the experienced approach to the Conservation Area. The Sites's contribution to the Conservation Area's significance through setting is minor and so impacts are likely to be minor resulting in a low level of less than substantial harm.

3.9 The site contains records (from Heritage Gateway) of possible pit alignments, a possible Medieval monastic site and findspots of Roman and later metalwork. There are also records of ridge and furrow. For a site of this size these records are broadly consistent with what one would expect locally. These remains would not be a constraint to development and there would be a usual process of supporting the application with an Archaeological Desk-Based Assessment, geophysical survey and trial trenching – which is likely to lead to limited targeted mitigation post-consent.

3.10 Coney Farm has a single barn which has been highlighted as a potential non-designated heritage asset. Our site visit has confirmed this is 19th century but that it is in poor condition and of no/ low architectural or historic interest. At most it would be a non-designated heritage asset of low local significance. The proposals could lead to the loss or alteration

which would result in harm to a non-designated asset of low local significance. This harm could be mitigated through recording.

Statutory Consultee Reponses

2.11 Historic England comments (15 May 2025) to the Preferred Options Consultation. These comments raise no objections in principle and simply highlight the requirement for studies to inform a site specific policy:

> *"HE notes that whilst there are no designated heritage assets within the site. That is the Scheduled monument Pit alignments north of Bubbenhall Village to southwest and Boven Hall Conservation Area containing a number of Grade 2 listed buildings further to the South. Although the pit alignment is suggested as East West in alignment, there can be multiple pit alignments and these features can be long (sometimes a few kilometres long). We therefore recommend a heritage impact assessment and geophysical survey are undertaken prior to allocation to inform conservation requirements. We also recommend that a heritage impact assessment and landscape and visual impact assessment are undertaken in relation to the impact on the conservation area and listed buildings prior to allocation. The finding of these studies. Should then inform the development requirements of a site-specific policy."*

Evidence Base

3.11 Node was appointed to support Rugby Borough Council (RBC) in the baseline review of a selection of sites nominated for allocation within the emerging local plan. Their brief was to provide RBC officers with specialist support in the assessment of sites relative to their potential for heritage impacts (either positive or negative) and contribute to the creation of a robust evidence base for the Local Plan making process. As such they are a genuinely independent heritage advisor. In their review they conclude the Site makes little contribution to the significance of the Scheduled Monument and that the Listed Bridge's setting has been significantly impacted by the road traffic and noise so that any sense of rural tranquillity and amenity has been substantially eroded. With regards to Bubbenhall Conservation Area they conclude the contribution to character and significance, when taken as a whole, is relatively minor. Their summary is included below:

> *"The site lies southwest of Coventry, between Middlemarch Business Park and the A423. It contains no designated heritage assets. While an historic agricultural character remains through landscape features, most traditional buildings have been lost. One surviving 19th century structure at Coney Grey Farm may hold limited heritage interest, though access constraints mean its significance remains unconfirmed.*
>
> *The site lies near several designated heritage assets, including the grade II listed Ryton Bridge, approximately 75 metres north. While there is no strong visual or functional relationship, the bridge can be encountered from a Public Right of Way which first crosses the site and provides some allusion to its original, rural setting. That setting is, however, now heavily affected by road activity and noise.*
>
> *In the site's wider context are a scheduled pit alignment and the Bubbenhall Conservation Area. The site is considered to make an at most minor contribution to their setting.*
>
> *The local Historic Environment Record notes ridge and furrow, and find spots indicating medieval and prehistoric activity.*

Potential impacts include loss of archaeological features, erosion of the rural landscape character that modestly contributes to local assets' heritage significance, and potential loss of a non-designated asset at Coney Grey Farm (subject to further investigation). A coordinated approach to archaeological assessment, heritage appraisal, and landscape design is encouraged to inform development and mitigate harm, particularly along the public right of way corridors."

3.12 Our assessment for this comparison has found that there are no designated assets within the site, so there would be no direct harm to designated heritage assets.

3.13 There is the potential for indirect harm via setting could occur to Ryton Bridge, Scheduled Monument and Conservation Area. The impacts are likely to be neutral or minor adverse provided development does not materially alter key local views from public rights of way or intrude into the immediate landscape context of Ryton Bridge. The bridge's setting is already heavily affected by road infrastructure; the site's contribution to understanding the bridge's significance is minor.

3.14 We would agree with the NODE assessment. Essentially in common with all proposed developments areas in Warwickshire of this size – the site contains non-designated heritage assets that will require investigation through geophysical survey, trial-trenching and that is likely to lead to targeted excavation secured by condition should planning consent be granted. There is no suggestion that the site contains remains of a significance that would require preservation in situ or to be designed around. Should this site be allocated a decision maker could be confident that the needs case for required employment space clearly outweighs the minimal heritage harms.

4 Land at Walsgrave Hill

Location & Site description

4.1 Grid reference: 439491, 280573

4.2 The Site is agricultural land bisected by an east-west Public Right of Way (PROW). It is located immediately north of Coombe Abbey Registered Park & Garden (RPG) (Grade II*, NHLE 1000408) with the M6 to the north, A46 to west with Coventry (Including the large scale hospital) beyond and industrial warehouses to the east.

Baseline of designated heritage assets

4.3 The following baseline is established from designated heritage assets within 1km of the Site and those shown within the Zone of Theoretical Visibility (ZTV) (Figure 5).

Asset Name	National Heritage List Entry number	Designation	Distance from Site
Walsgrave Hill Farmhouse	1233531	Listed Building, Grade II	Within the site
Coombe Abbey	1000408	Registered Park and Garden (RPG), Grade II*	Borders the entire southern boundary of the site
Coombe Abbey	N/A	Conservation Area	Borders the entire southern boundary of the site
Peter Hall	1276582	Listed Building, Grade II	285m east of the site
Within the Coombe Abbey RPG:			
Mound S of Combe Abbey	1005765	Scheduled Monument	1km south of the site
Coombe Abbey	1233485	Listed Building, Grade I	550m south of the site
Tennis Court At Combe Abbey	1233658	Listed Building, Grade II*	510m south of the site
The Woodlands	1233533	Listed Building, Grade II*	480m south east of the site
West lodge	1233532	Listed Building, Grade II*	940m south of the site
Combe Abbey, Garden Wall Extending From 40 Metres North West Of Front To Garden Steps	1233487	Listed Building, Grade II	510m south of the site
Combe Abbey, 2 Cottages And Outbuilding Approximately 30 Metres From North Front	1276598	Listed Building, Grade II	480m south of the site

Combe Abbey, Stable block Approximately 40 Metres North East Of Abbey	1276600	Listed Building, Grade II	455m south of the site
Garden Wall To South And West Of Stable block, Combe Abbey	1276491	Listed Building, Grade II	530m south of the site
Kitchen Garden And Associated Bothies And Gardeners Cottage 130 Metres North East Of Combe Abbey	1389393	Listed Building, Grade II	400m south of the site
Boat House On South Side Of The Pool, Combe Abbey	1276492	Listed Building, Grade II	326m south of the site
Menagerie Farm buildings To North West Of The Woodlands	1233663	Listed Building, Grade II	375m south of the site
Wall To North Of The Woodlands, Combe Abbey And Attached Farm buildings	1276493	Listed Building, Grade II	400 south of the site
Wall To South Of The Woodlands Combe Abbey	1233703	Listed Building, Grade II	535m south of the site
Old Lodge Farmhouse	1034896	Listed Building, Grade II	1.5km south of the site
Old Lodge Farm, Barn Approximately 10 Metres South of Farmhouse	1034897	Listed Building, Grade II	1.5km south of the site
Hungerley Hall Farm:			
Hungerley Hall Farmhouse	1265694	Listed Buildings, Grade II	Close to the site's south-western boundary
Barn north of Hungerley Hall Farmhouse	1226789	Listed Building, Grade II	
Granary, Cowshed and Stable Range	1265638	Listed Building, Grade II	
Wood Hill Farmhouse	1276547	Listed Building, Grade II	1.5km to south east of the site
East Lodge	1233489	Listed Building, Grade II	1.5km south east of the site
Ansty Hall	1365084	Listed Building, Grade II*	1.8km north of the site
Church of St James	1034889	Listed Building, Grade II*	1.8km north of the site
Cistercian grange of Upper Smite, 200m south east of Mobbs Wood Farm	1016847	Scheduled Monument	2.9km north east of the site
Site of deserted village of Hopsford	1005731	Scheduled Monument	3.1km north east of the site

Total number of assets

	Scheduled Monuments	Registered Parks and Gardens	Listed Buildings			Total Listed Buildings	Conservation Area
			Grade I	Grade II*	Grade II		
Within the site	0	0	0	0	1	1	0
Beyond the site	3	1 (Grade II*)	1	5	17	23	1

Assessment of Potential Impacts

4.4 The Site provides a crucial component of the immediate rural foreground to Coombe Abbey RPG. Its undeveloped character sustains a tangible sense of isolation, separation and relative tranquillity on the park's northern edge, and this agricultural foreground helps preserve the legibility of the parkland's designed relationships and approach sequences. In heritage terms that undeveloped buffer is not peripheral: it contributes materially to the aesthetic and historic experience of the Grade II* RPG by retaining the pastoral context against which the designed landscape is read.

4.5 It is acknowledged that the wider area already contains urban and industrial influences—most notably large warehouses to the north—whose siting reflects established historical precedents and post-war land uses. However, those pre-existing incursions are distinct in origin and physical separation from the present park edge.

4.6 For the Grade II Listed Wallsgrave Hill Farm within the Site, the surrounding open land is an intrinsic part of significance. The Farmhouse's evidential, historic and communal values are strongly expressed through its agrarian setting and the visual and functional relationship with the fields it historically worked. The current undeveloped land therefore underpins the farmstead's authenticity and its ability to convey its historic agricultural use and landscape associations.

4.7 The current proposed masterplan shows large-scale development proximate to Grade II Listed Farmstead within the Site (Land at Walsgrave Hill) that intrudes on its immediate setting. By nature a farmhouse's significance lies in the agrarian character of the land surrounding it and the historic association of the land it farmed and the legibility of the historic working relationship between the dwelling, its outbuildings and the land it farmed. Proposals that replace or overwhelm that setting will materially diminish those values. As drafted, the scheme would effectively remove the remaining rural character that sustains the farmstead's significance and so is likely to result in a high level of less than substantial harm to the heritage interest of the Listed Farmhouse.

4.8 Peter's Hall is a nearby Grade II Listed Farm. Existing industrial warehouses (including Rolls Royce) have already affected some of the northern views. The proximity and scale of the proposed development would substantially diminish the farmstead's surviving agrarian context and are therefore likely to result in a mid-high level of less than substantial harm.

4.9 The Site represents one of the last intact fragments of rural foreground to the RPG (Coombe Abbey) and its Conservation Area, and therefore preserves a remaining sense of isolation, tranquillity and separation that urban expansion has otherwise eroded. That undeveloped foreground is a crucial component of the park's setting and makes a material

contribution to its aesthetic and historic significance by maintaining the visual and spatial contrast between designed landscape and surrounding urbanised land.

4.10 This surviving agrarian character is central to how the parkland and the nearby cluster of farmsteads — including the Grade II Listed farmhouse within the Site — are experienced and understood. The open fields and pastoral context underpin the legibility of historic relationships between house, park and working land, enabling appreciation of the park's original composition and the farmsteads' agricultural function; erosion of this character would therefore materially reduce the ability to read and appreciate those heritage assets.

4.11 The introduction of large-scale buildings, service yards, extensive external storage, highway infrastructure, lighting and increased vehicle movements on the Site would fundamentally alter that foreground. Such change would be visible from the RPG and Conservation Area, from the public right of way that crosses the Site, and from the Listed Farmhouse within the Site, and would therefore materially alter the immediate setting and the sequence of views that contribute to an understanding of the designed landscape. The cumulative effect of built massing, artificial illumination and operational noise would reduce the perception of rural openness and interrupt the visual and experiential links between the parkland, its approaches and the surrounding Farmstead group.

4.12 There is a high likelihood of less-than-substantial harm at a mid-high level to the heritage significance of the Grade II* RPG and to the group value of nearby high-grade Listed Buildings. Change to the northern park edge, loss of historic pastoral context, intrusion of industrial/commercial massing, and increases in lighting and traffic noise would all materially diminish the ability to understand and appreciate the RPG and its associated assets.

4.13 The ZTV demonstrates the number of potential assets which span a substantial distance from the Site which could be impacted. While distance and existing development would reduce the large scale nature of the development; impacts would still need to be assessed as part of a full application. In particular the highly graded assets including two Scheduled Monuments of Cistercian grange of Upper Smite, 200m south east of Mobbs Wood Farm and the Site of deserted village of Hopsford, along with Grade II* Listed Ansty Hall and The nearby Church of St James.

Statutory Consultee Reponses

4.14 The Inspector's Report to the currently adopted local plan highlights the clear reasons why Land at Walsgrave Hill was not selected as a housing allocation during the previous local plan process:

"*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***".

4.15 Historic England's Response to the proposed residential site allocation in the adopted local plan:

> *"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."*

Evidence Base

4.16 Node's report highlights the readily appreciable experience between the Grade II* RPG of Coombe Abbey and the Site and the key concerns which include: "*the further encroachment of modern development into the setting of Coombe Abbey and the historic farmsteads, and the erosion of the tranquil setting of the park which is a primary feature of its significance*." Their summary is included below:

> *"The site is located east of Coventry and to the far west of the historic settlement of Brinklow. It includes Walsgrave Hill Farmhouse, a late 18th-century grade II listed building. The site is also adjacent to the grade II* Coombe Abbey Registered Park and Garden, and the Coombe Abbey Conservation Area. The northern boundary of the Registered Park and Garden offers open views across the site, which is formed of agricultural land interspersed with historic farmsteads. The site is also bisected by a public right of way, offering views towards Coventry city centre and the surrounding countryside. However, modern developments, including industrial sheds and the M6 motorway, intrude into the landscape, and have begun to erode at the setting of the Registered Park and Garden, and the historic farmsteads.*
>
> *Key concerns include the further encroachment of modern development into the setting of Coombe Abbey and the historic farmsteads, and the erosion of the tranquil setting of the park which is a primary feature of its significance.*
>
> *To mitigate harm, any development should be concentrated away from the Registered Park and Garden's boundary, and a robust mitigation strategy delivered including planting and cut and fill exercises. The restoration of historic farm buildings and their integration into the site, enhanced screening, and sensitive design could also help mitigate impacts. The design should reflect local precedents, and the public rights of way should be improved to strengthen connections with the surrounding historic landscape."*

4.17 Our assessment generally concurs with Node's findings: the proposed scheme, while seeking to reduce direct effects on the RPG through provision of a country-park buffer, would nonetheless remove the remaining separation between Coombe Abbey and the urban extent of Coventry. That loss of separation is a fundamental change to the landscape context of the RPG and to how the designed landscape is experienced, and it cannot be fully offset by a nominal buffer if development pressure is simply displaced elsewhere across the site.

4.18 By locating the country-park buffer to the south and pushing the built envelope northwards, the masterplan concentrates large-scale development in close proximity to the Grade II Listed Farmhouse within the Site. Because the Farmhouse's significance is principally derived from its agrarian setting and the legible relationship with surrounding land, the intensification of development around its immediate foreground would materially erode this contribution to significance. As a result the scheme as currently drawn is likely to cause a high degree of less-than-substantial harm to the Listed Farmhouse's significance.

4.19 Taken together with the RPG directly abutting the southern boundary, these constraints create a tightly constrained heritage envelope. The National Planning Policy Framework requires decision-makers to give great weight to the conservation of designated heritage assets (and proportionately greater weight to assets of higher significance), so any harm to the Grade II* RPG or to the in-site listed farmhouse will be heavily disfavoured unless exceptional justification and substantial public benefits can be demonstrated.

4.20 For these reasons the Site is, in principle, difficult to develop without causing material harm to heritage significance of a number of designated heritage assets.

5 Comparison of Prologis Park Ryton West and Mountpark and Land at Walsgrave Hill sites

5.1 The Prologis Park Ryton West and Mountpark site contains no designated heritage assets within its boundary and, on the evidence available, makes only a limited contribution to the setting of nearby designated assets. Although surviving elements of historic agricultural landscape (e.g. ridge and furrow traces and a small nineteenth-century farm building) give the Site some historic interest, these are of relatively modest value and are not integral to the core significance of adjacent designated heritage assets. The nearest designated features (Ryton Bridge, the Scheduled pit alignments and Bubbenhall Conservation Area) are separated from the Site by distance, intervening modern infrastructure and limited intervisibility and where connections do exist they are experiential (public right of way walks) rather than functional or designed. A decision maker could confidently allocate this land for employment safe in the knowledge that the needs case for the scheme clearly outweighed the very limited heritage harm.

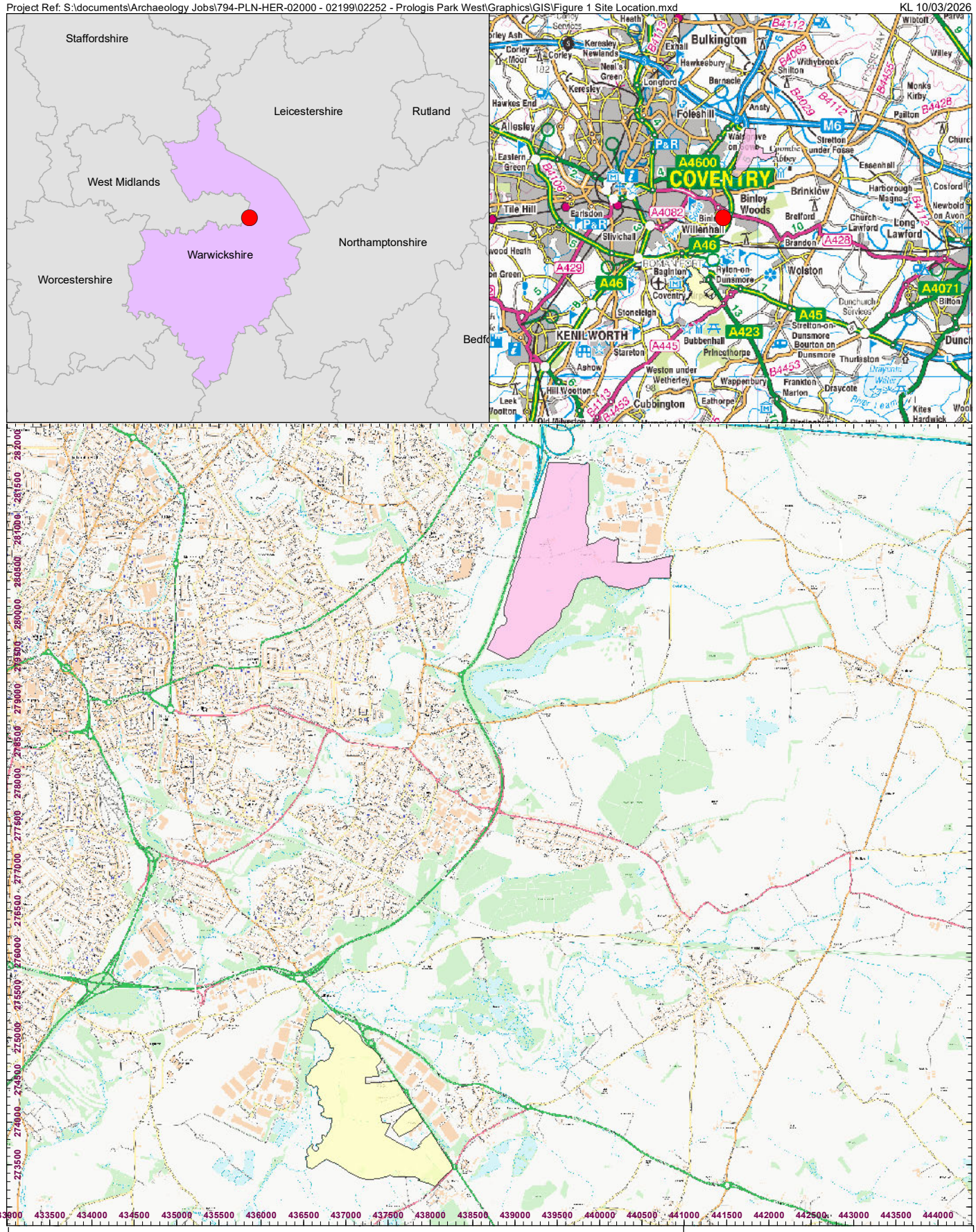
5.2 The Land at Walsgrave Hill site is intrinsically highly sensitive. This land forms the crucial buffer that serves to protect the setting and significance of the Grade II* Coombe Abbey RPG and its Conservation Area. Whilst the Masterplan has been redrawn to seek to provide an enhanced buffer to the RPG the knock-on effect is that large scale Modern development is now proposed to dwarf and surround the Grade II Listed Farmhouse within the Site itself. These relationships mean the Site forms part of the immediate foreground and historic context for assets of national importance. Under the National Planning Policy Framework the conservation of designated heritage assets must be given great weight, and the guidance is explicit that “the more important the asset, the greater the weight should be.”

5.3 A decision-maker must demonstrate that appropriate weight has been given to the statutory duty to protect the setting and significance of designated heritage assets. That obligation requires the planning authority to consider not only the presence of heritage assets but also the degree to which a proposal would affect their significance, and to record transparently how that weighting has informed the planning balance.

5.4 Where, as here, two competing schemes are proposed for allocation, the relative strength of their demonstrable need and public benefits becomes material to whether any identified harm can be justified. On the evidence before us, the case for the Land at Walsgrave Hill proposal would need to be materially stronger than that for the Prologis Park Ryton West and Mountpark proposal in order to overcome the greater heritage sensitivities it creates; in other words, the Land at Walsgrave Hill scheme would be required to demonstrate proportionately greater public benefits or exceptional mitigation to clear the heritage hurdle.

5.5 The local planning authority and statutory consultees (including Historic England where appropriate) must apply the NPPF’s requirement to give “great weight” to the conservation of designated assets, recognising that the more important the asset the greater the weight. This test is likely to be determinative of acceptability unless proposals can show genuine avoidance of harm, high-quality design that preserves significance, and clear, demonstrable public benefits that clearly outweigh any residual harm.

Figures



N

0 2,400 m

Scale at A4: 1:62,000

Land at Walsgrave Hill

Prologis Park Ryton West and Mountpark

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Figure 1

Site Location

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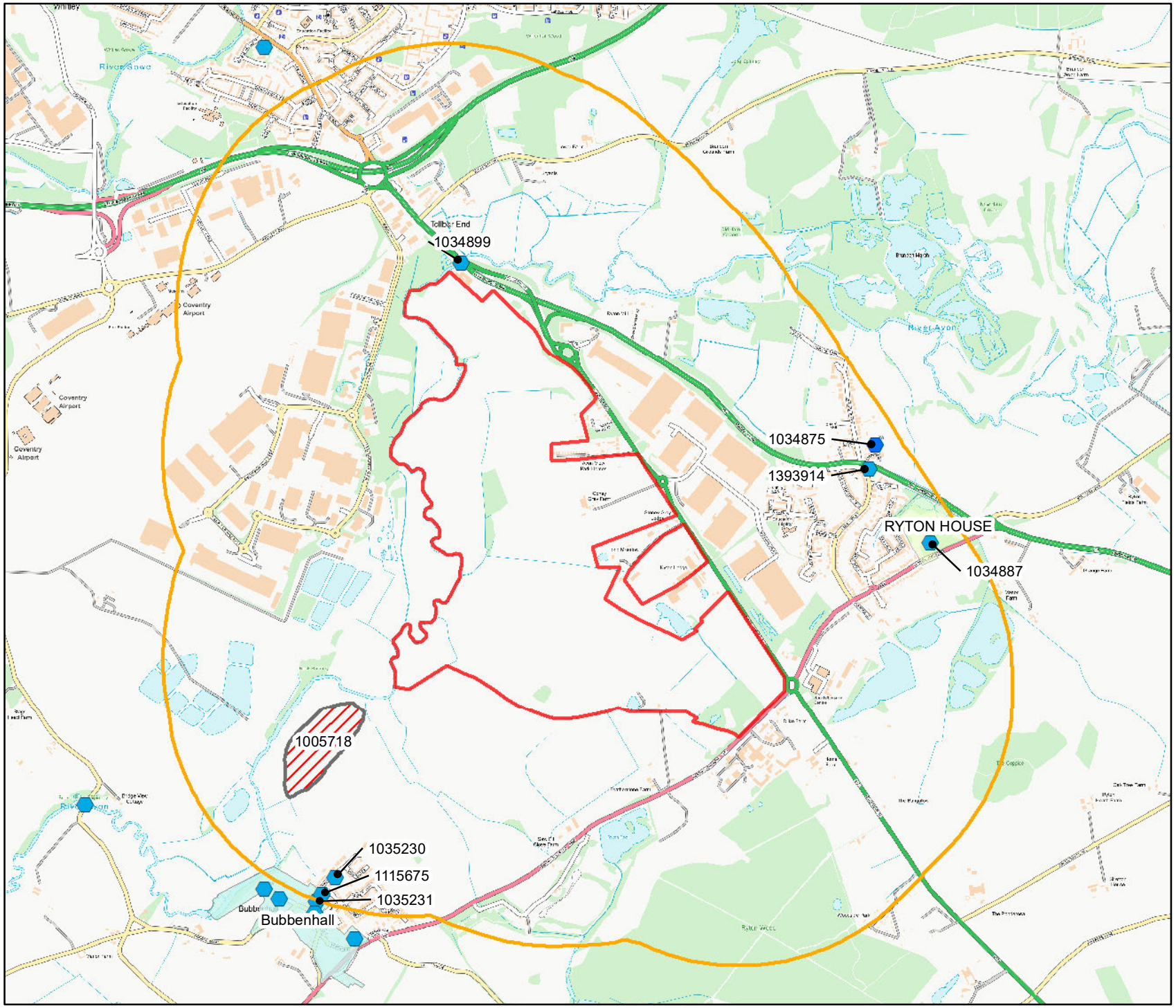

Site Boundary

1km Search Area

Listed Buildings

Grade

I

II*

II

Scheduled Monuments

Parks And Gardens

Grade

I

II*

II

Conservation Area

N

0 295 590m

Scale at A4: 1:23,000

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Figure 2

Prologis Park Ryton West and Mountpark Designated Heritage Assets

Project Ref: S:\documents\Archaeology Jobs\794-PLN-HER-02000 - 02199\02252 - Prologis Park West\Graphics\GIS\Figure 2 Des Ass A4.mxd

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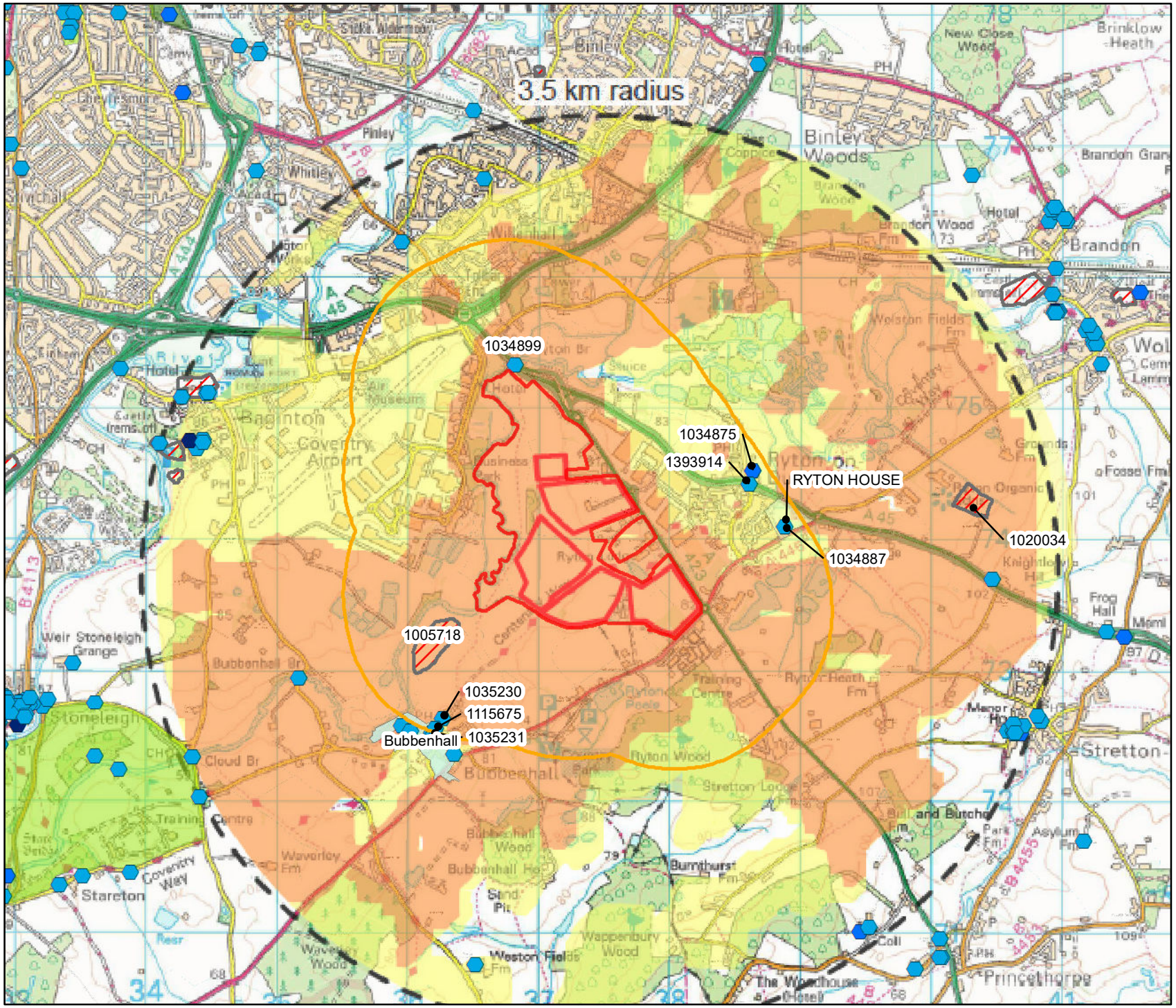

Site Boundary

1km Search Area

Listed Buildings

Grade

I

II*

II

Conservation Area

Scheduled Monuments

Parks And Gardens

Grade

I

II*

II

N

0 495 990m

Scale at A4: 1:40,000

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Figure 3

Prologis Park Ryton West and Mountpark Designated Heritage Assets and ZTV

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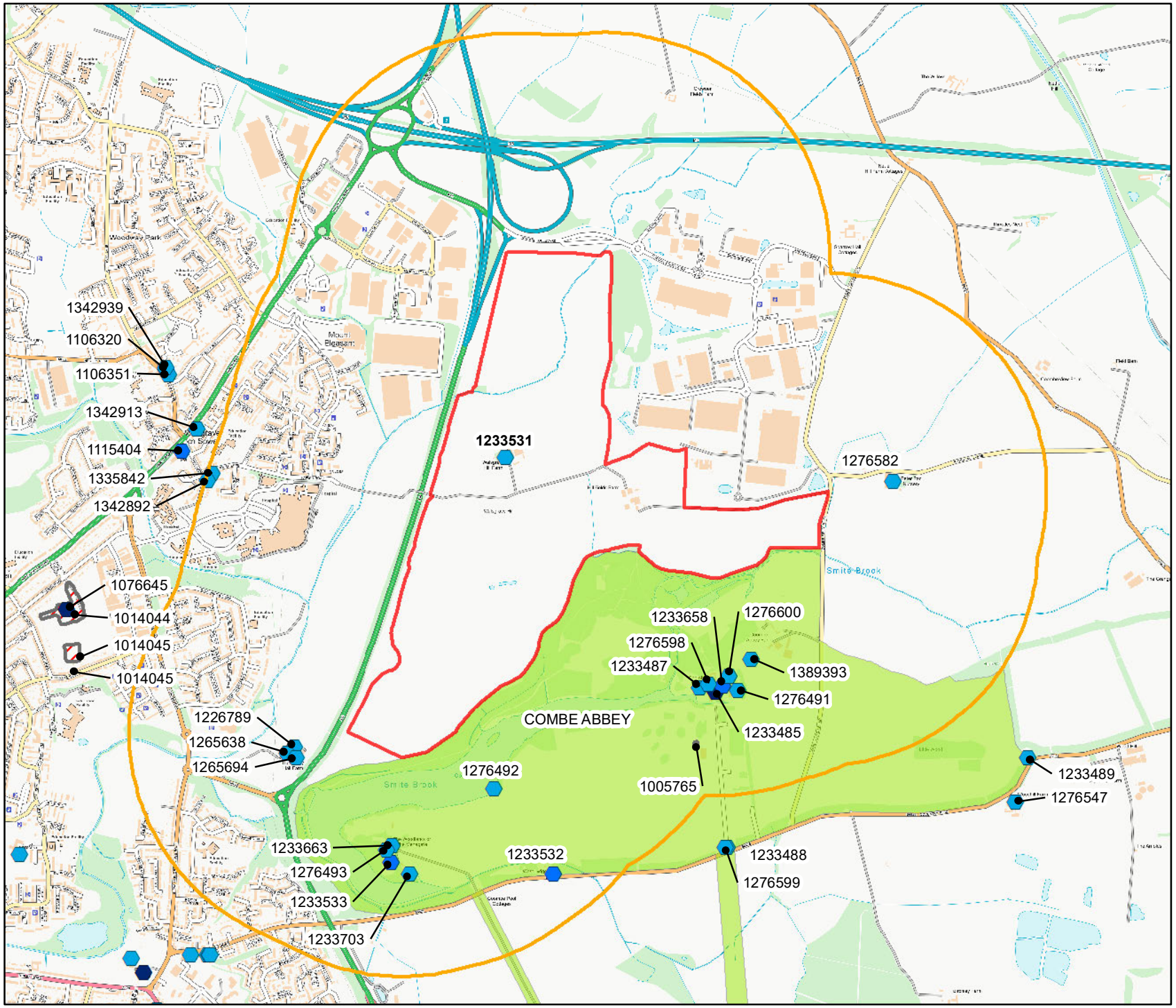

Site Boundary

1km Search

Listed Buildings

Grade

I

II*

II

Scheduled Monuments

Parks And Gardens

Grade

I

II*

II

N

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Scale at A4: 1:24,000

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Figure 4

Land at Walsgrave Hill
Designated Heritage Assets

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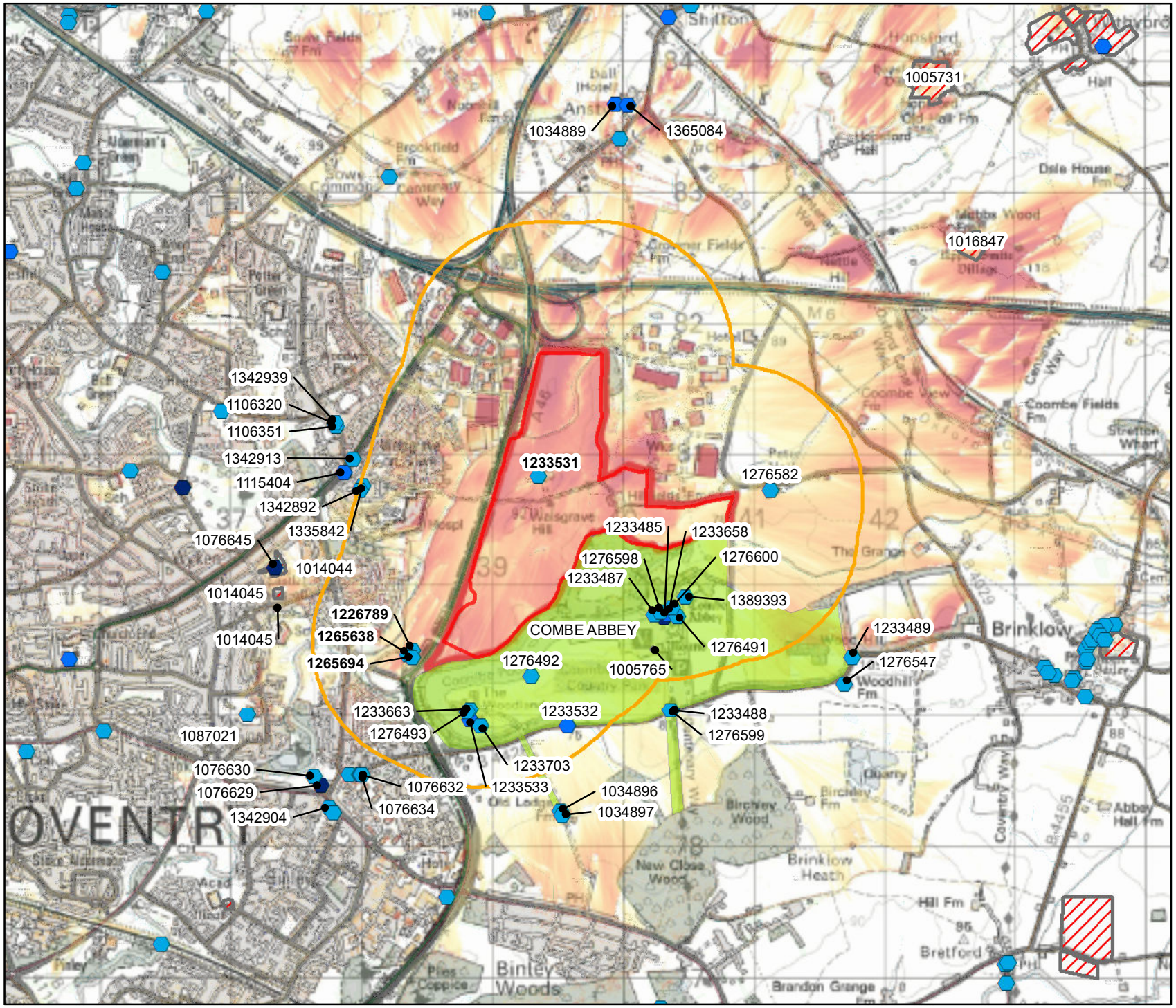

Site Boundary

1km Search

Listed Buildings

Grade

I

II*

II

Scheduled Monuments

Parks And Gardens

Grade

I

II*

II

N

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Figure 5

Land at Walsgrave Hill
Designated Heritage Assets and ZTV

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Appendix 3 – Response to RBC Transport Evidence Base

Prologis UK Limited and Mountpark

RYTON WEST

Response to RBC Evidence Base for Transport

REP_019
MARCH 2026

CONFIDENTIAL

Prologis UK Limited and Mountpark

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

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100 Wharfside Street
Birmingham
B1 1RT

[redacted]

WSP.com

QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks				
Date	12 March 2026			
Prepared by	Divya Govindaraju			
Signature				
Checked by	Sravani Vuppala			
Signature				
Authorised by	Dan Griffiths			
Signature				
Project number	UK70088864			
Report number	REP_019			
File reference				

,

EXECUTIVE SUMMARY

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

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

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.

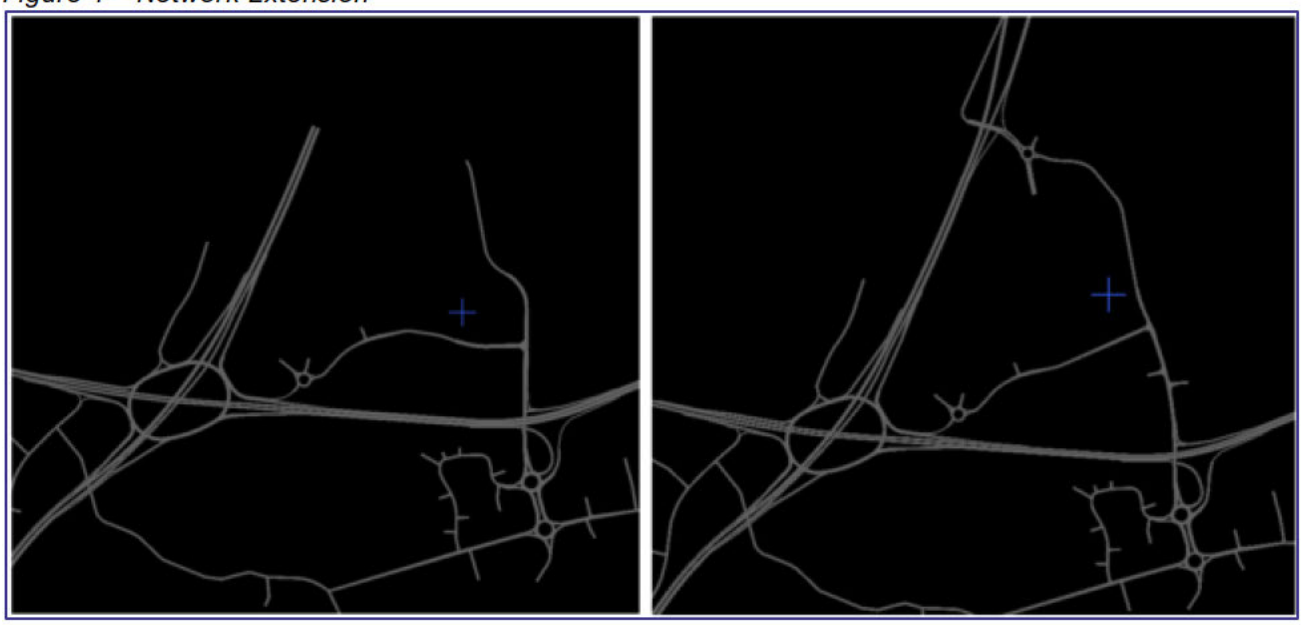
2.2.15. As detailed in Chapter 2 of the report, modifications to the highway network near the A46/Tollbar junctions have been implemented as part of infrastructure commitments related to ongoing developments. Notable changes include the construction of Silver Eagle Way and Firefly Road, which connect 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

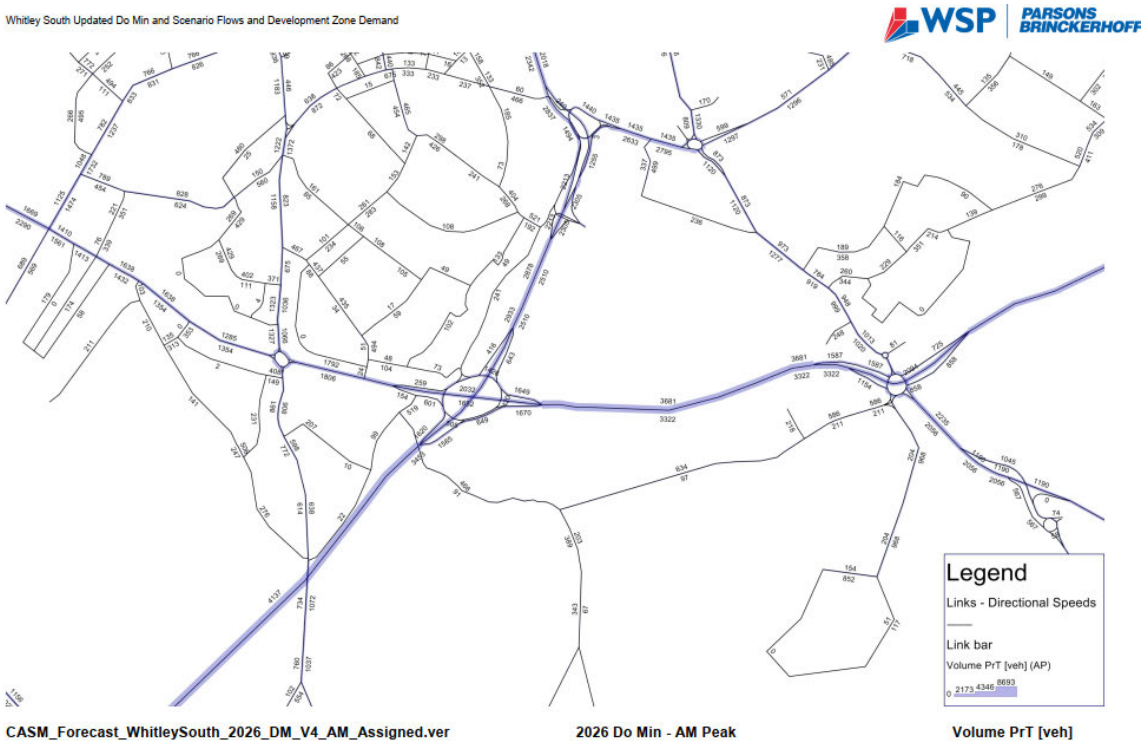
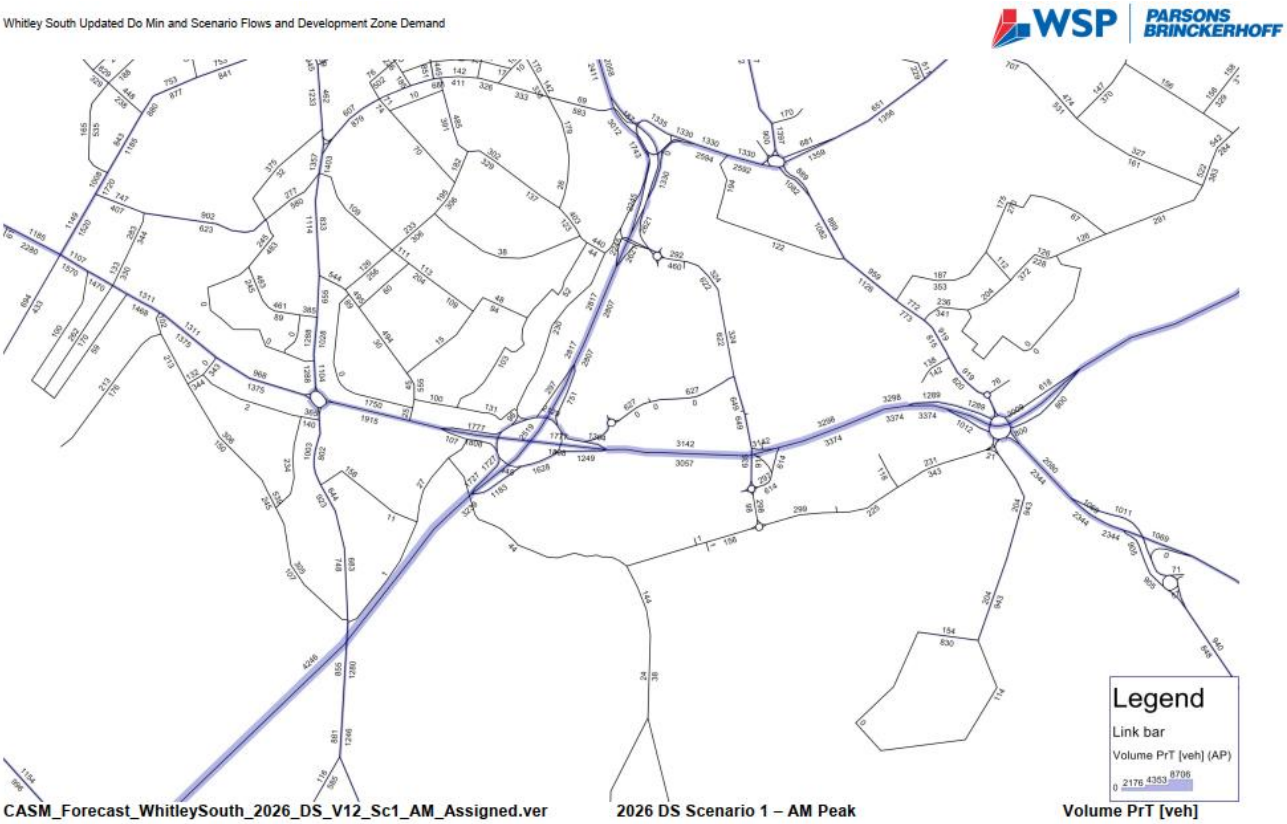


Figure 4: Extract from CASM – AM Peak with Reassignment of Traffic through Firefly Road



2.2.20. Furthermore, recent work using the CASM for the Coventry EiP used updated traffic flows from 2023 and the updated transport network. The 2041 assessment includes development at Prologis Ryton Park West as a near certain development, as well as the key developments at the Gigafactory, Whitley South and Gateway South. In this forecast year, the modelling shows an increase in traffic at the A46/ Tollbar in the morning, and a reduction on the A45 in the evening peak.

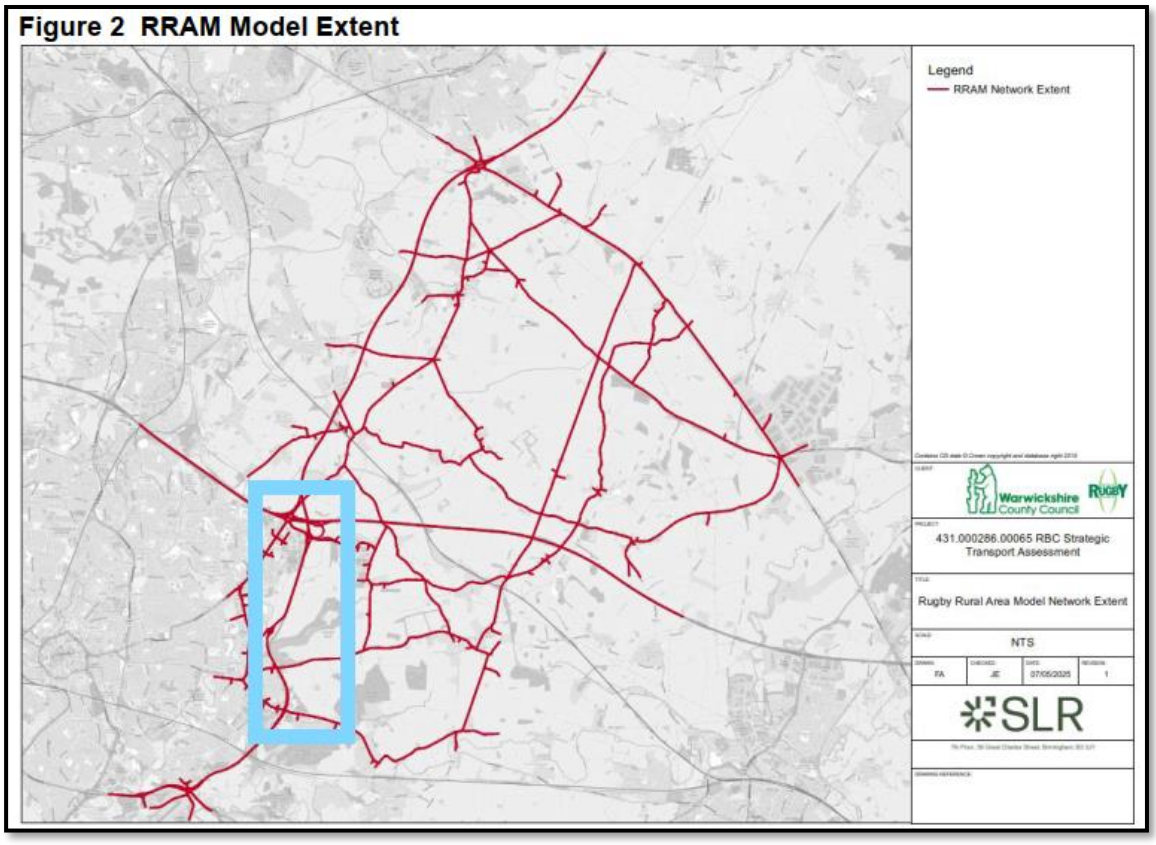
2.2.21. Therefore, it should be noted that the RRAM model has limitation at A46/ Tollbar End junction as assessing the impact of any additional traffic on top of the congested network without including network changes should be considered carefully prior to assessing the sites for local plan allocation.

2.2.22. The model seems to account for the impact of committed development traffic but does not include the funded mitigation measures related to these committed developments, and as a result, indicates contrary conclusions to those reached through previous planning consents which could overestimate the volume of traffic, queues and delays at the A46 Tollbar junction.

Review of Modelling from STA

2.2.23. As stated in para 2.3.7 of this report, the STA modelling was updated to include improvements at A46/Binley, A46/Walsgrave, and M6 Junction 2 along the RRAM network. These area of the updates corresponding to the RRAM model extent provided in Figure 2 of the STA is highlighted in the Figure 5 below.

Figure 5: RRAM Model Extent - RBC Strategic Transport Assessment



2.2.24. This suggests that improvements were made to the network in the model, and all that traffic is actually affecting the A46/Tollbar junction, which has not been properly validated. Moreover, changes in the

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

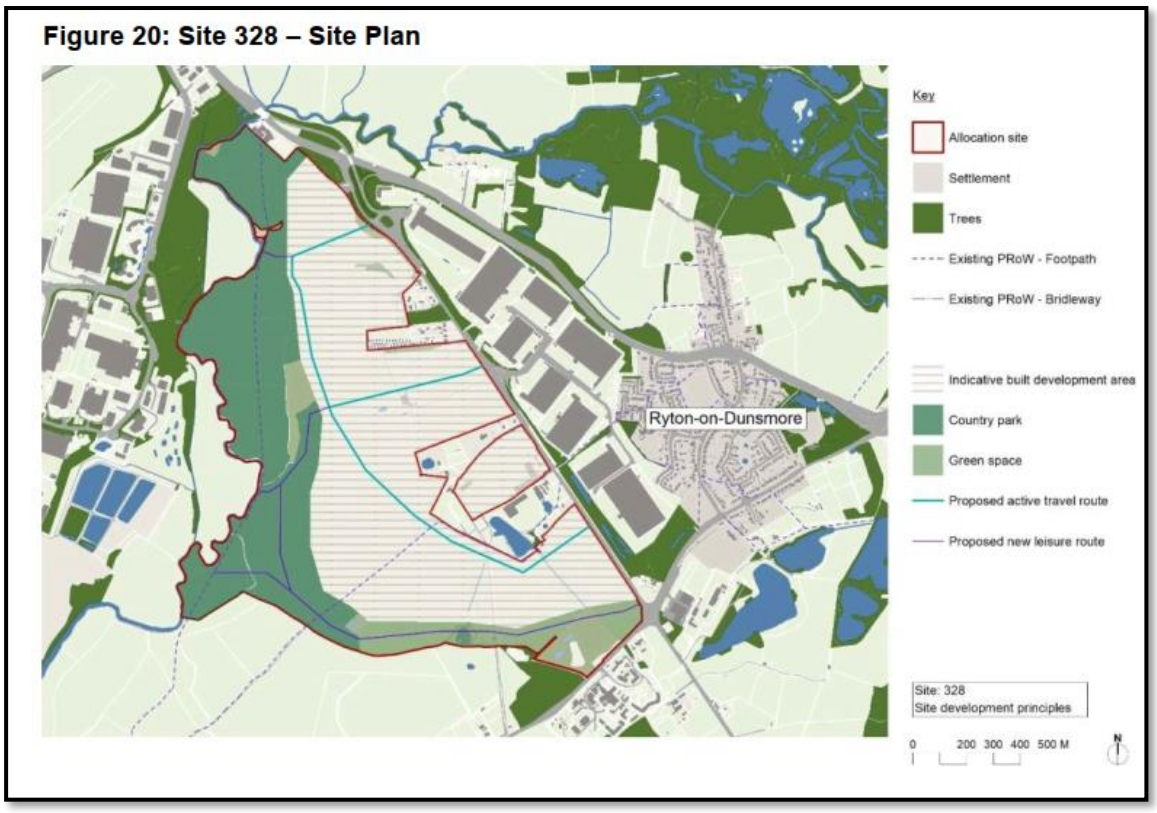
2.2.25. The assessment criteria and the site location used for Ryton West are outlined Figure 6 and Figure 7 below. This suggests that the strategic employment site which includes Mountpark site has been considered in the STA assessment and not Site 50 which is only Ryton West site.

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

Site 328 – Land West of Prologis Park (Employment)

- Development Proposals – Employment development to the west of A423 Oxford Road. The development consists of mixture of warehouses and industrial estates, covering 350,000m^2 floor space.
- Access Proposals – All accesses are provided along the A423 Oxford Road which includes accesses on two roundabouts, an existing priority-controlled access with gates and a new priority junction access with a possible roundabout or ghost island right-turn bay.
- Trip Rates – WCC standard employment trip rates have been assigned to this site.
- Trip Distribution – The trip distribution for this site has been informed via the WCC Mobile Network Database, using data for the LSOA of Rugby 004E.

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

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 0700-0800		AM 3hr Peak Period 0700-1000		PM Peak hr 1600-1700		PM 3hr Peak Period 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

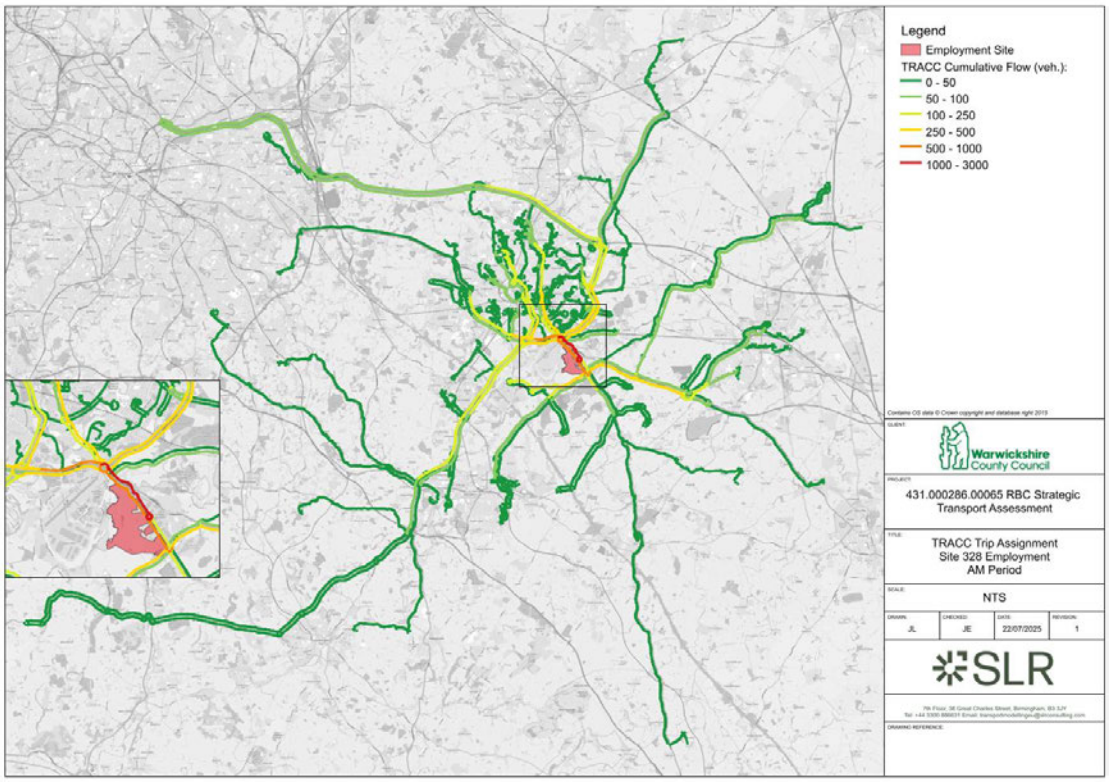
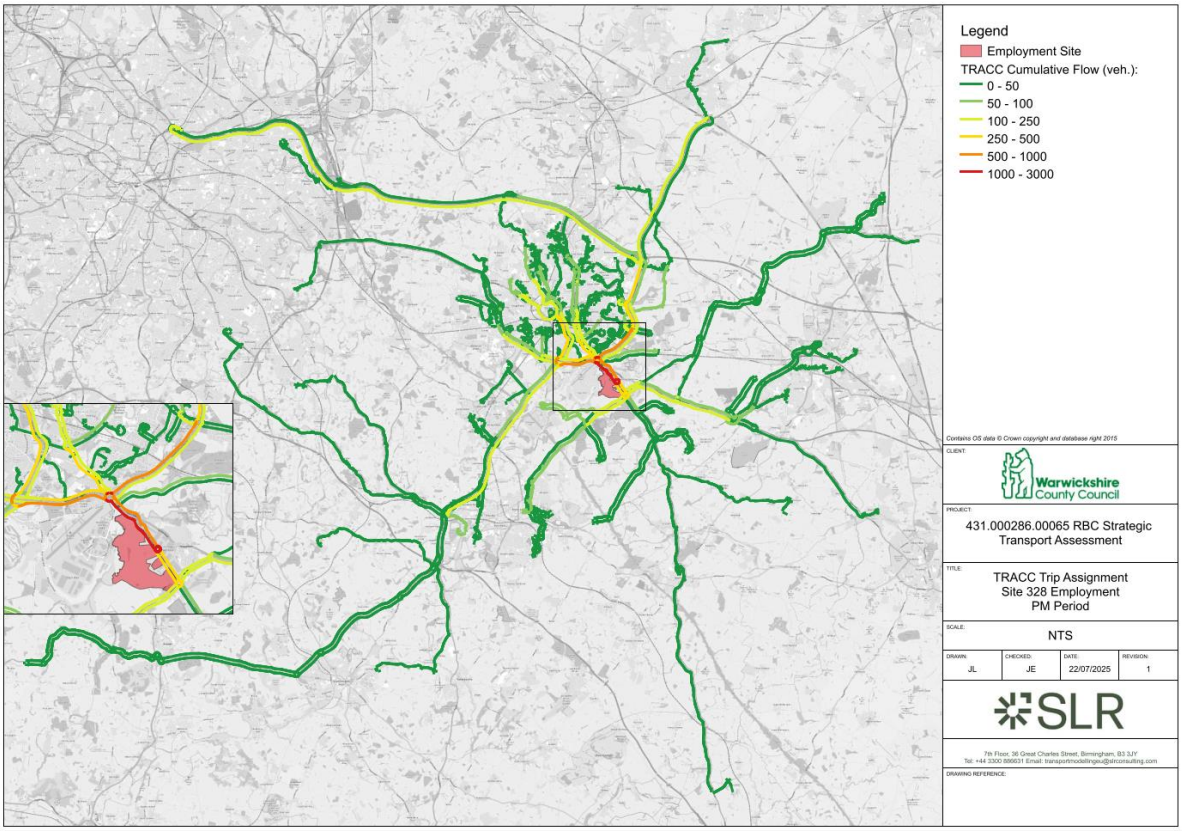


Figure 12: Trip Assignment - AM Peak



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

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)

4.10 Initial high level appraisal work has been completed by WCC which has considered the potential impacts, on the transport network, of the proposed sites based on the existing spatial characteristics of the areas where developments have been proposed. The initial analysis considered potential traffic increases arising from the proposed sites and how likely they are to impact areas of the network which are already constrained. The analysis also considered the potential benefits which may arise if WCC is able to bring forward measures identified within the Bus Service Improvement Plan (BSIP) and sites have been scored subject to how likely it is that the BSIP measures can assist in achieving higher mode share based on the site location. This information has been used within the site selection process.

4.11 Moving forward, a Strategic Transport Assessment (STA) is in the process of being commissioned. The initial appraisal work was simplistic in nature as it was required to consider a very large number of sites and appraise each one in traffic impact terms. RBC has now identified a set of sites which will comprise the preferred allocation strategy. The STA will enable a more detailed assessment of the potential impacts of these sites to be undertaken. This detailed analysis will consider the traffic growth which is likely to arise through the delivery of the plan and the effect that this growth will have on the operation of the highway network. Where impacts are identified, the STA will seek to identify mitigation measures to reduce the potential impact on the transport network. A hierarchy of potential interventions will be tested with measures to prioritise travel by active and sustainable modes of transport serving as the primary means of mitigation with highway capacity enhancements representing the final stage of mitigation required to support the local plan proposals whilst managing any potentially adverse effects on the highway network. The STA will comprise WCCs transport response to the Preferred Options and will form the basis of the transport evidence base through the Local Plan examination process, it will detail the approach to assessment and the mitigation requirements including active travel, public transport, rail and highway interventions.

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	Rugby 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

SLR

Job Title:	RBC LP Inital Site Analysis
Job Number:	286.00019
Model Name:	N/A
Model Years:	N/A
Model Location:	Rugby Borough, Warwickshire
Date:	December 2024

KEY:

Least Congested 6 | 5 | 4 | 3 | 2 | 1 Most Congested

Example Buffer Areas (Applied by Site Type):

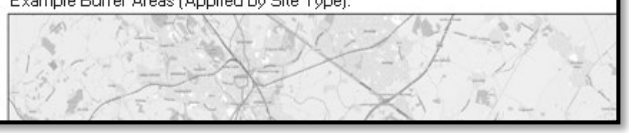


Figure 18: All Site Speed Analysis - Transport network analysis - site ranking by congestion level

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%	88.4%	6
328	Edge of Town	STRATEGIC - Land West of Prologis Park (Employment)	43	33	38	75.2%	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	**Active Travel** • Pedestrian and cycle permeability through the site • 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)

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 routeing 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 m²	A46 Tollbar / Ryton Island
95	Crowner Fields Farm, Ansty	275,000 m²	M6 J2 (Ansty Interchange)
17	South West Rugby Employment Phase 2	130,000 m²	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.

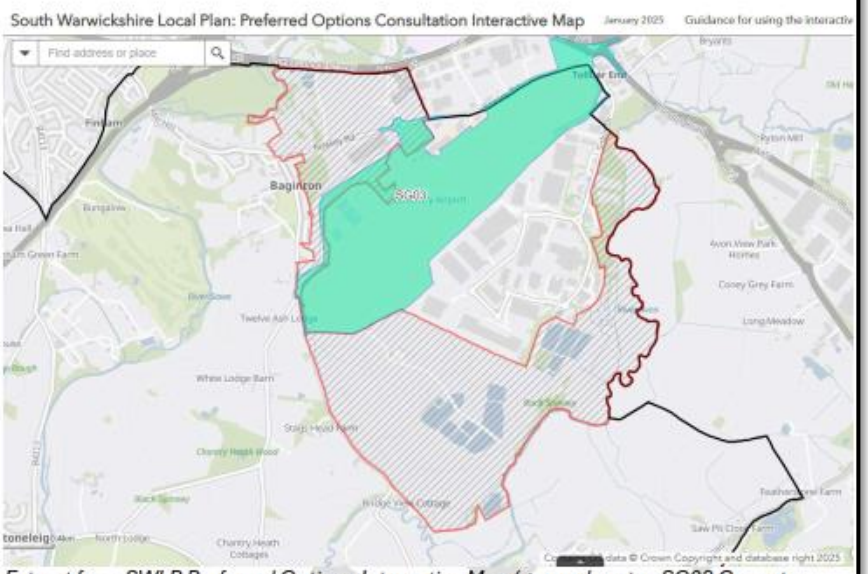
3.4 WARWICK DISTRICT COUNCIL & STRATFORD-ON-AVON DISTRICT COUNCIL

3.4.1. South Warwickshire Councils (Warwick District Council and Stretford-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

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.

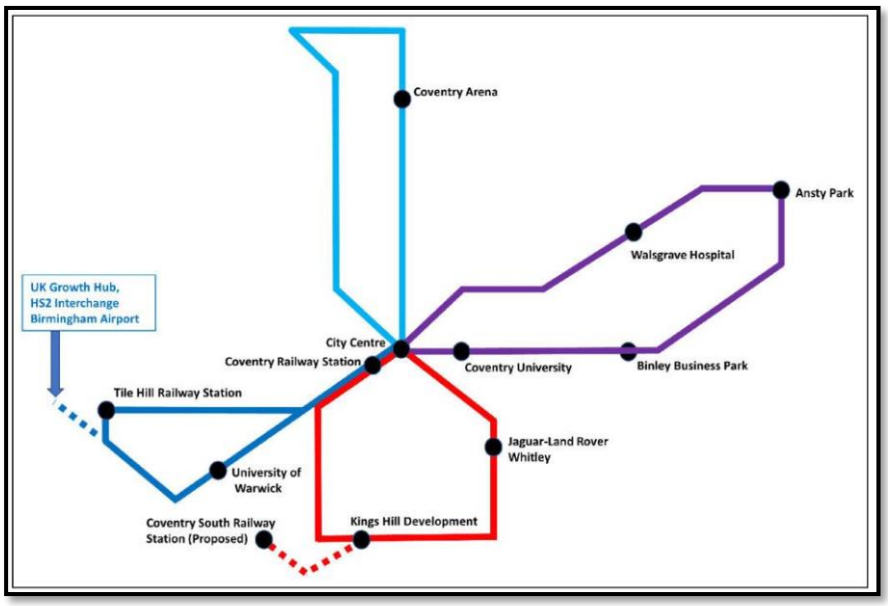
4.2.2. This section also provides details of potential schemes near Ryton from the review of the Warwickshire Local Cycling and Walking Infrastructure Plan (LCWIP) and Coventry LCWIP and assess how these will enhance sustainable access to the site.

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.

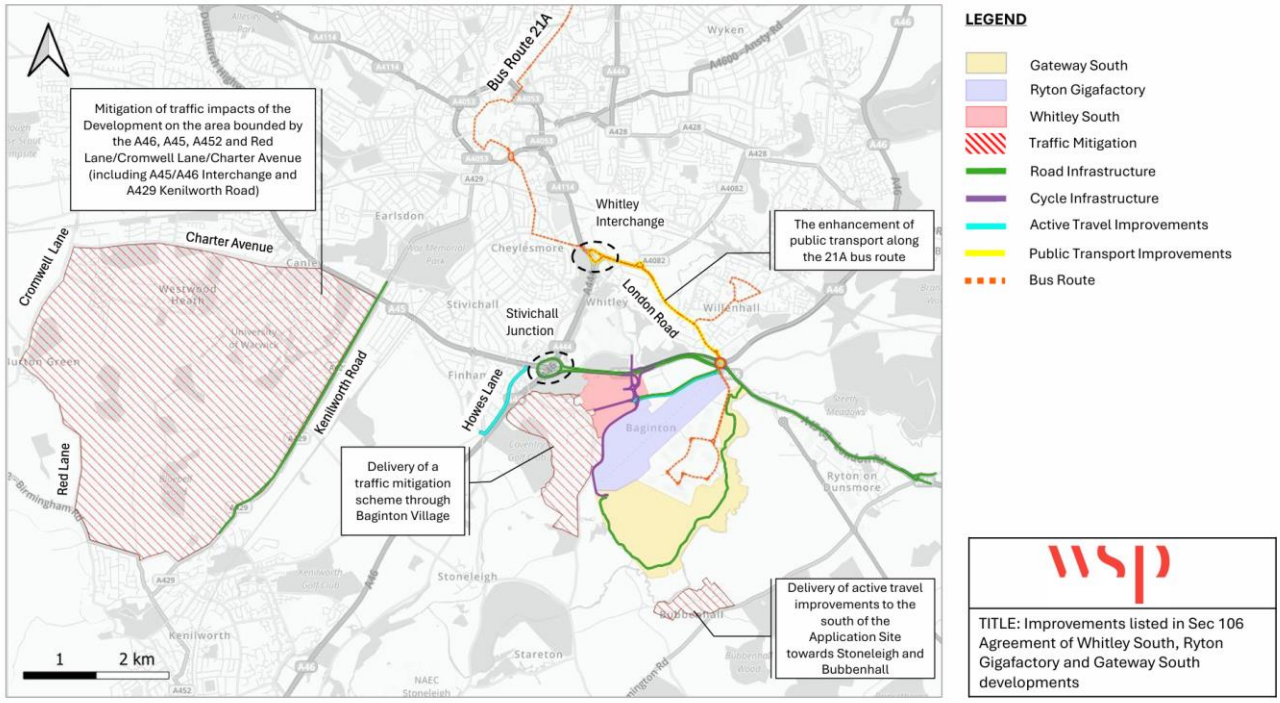
COVENTRY GIGAFACTORY

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.

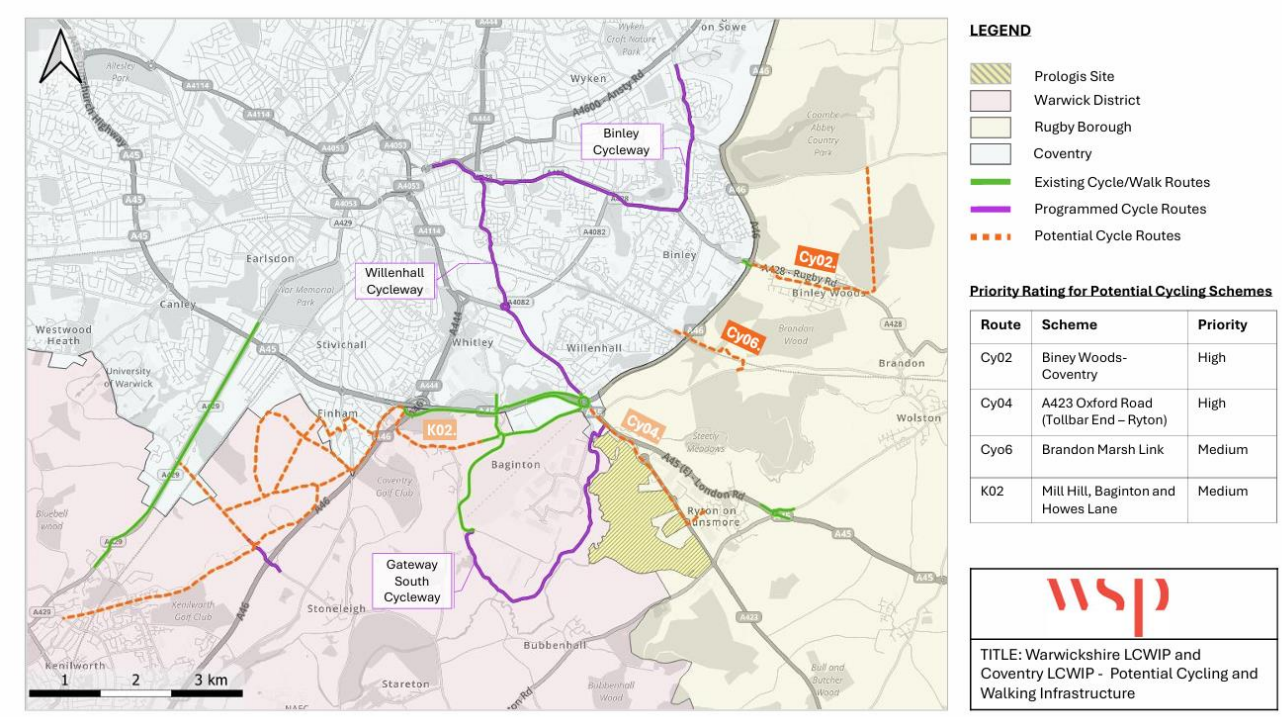
4.2.14. Complementing this, the Warwickshire LCWIP identifies several proposed connections between Rugby Borough and Coventry. Of these, Cy04 (A423 Oxford Road: Tollbar End – Ryton) is a high-priority intervention, providing a direct footway/cycle track connection along Oxford Road and thereby bridging 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



Route	Scheme	Priority
Cy02	Biney Woods-Coventry	High
Cy04	A423 Oxford Road (Tollbar End – Ryton)	High
Cyo6	Brandon Marsh Link	Medium
K02	Mill Hill, Baginton and Howes Lane	Medium

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

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

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

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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Appendix 4 – Prologis Park Ryton West Vision Statement

PROLOGIS®

Prologis Park Ryton West

Vision Statement – Updated

March 2026

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About **Prologis**

Prologis is the largest global industrial REIT with over $208 billion of assets under management in a 1.2 billion sq. ft portfolio. Prologis is one of the largest industrial developers in the UK, with £5.8 billion of assets under management.

As the Number One REIT on the Global Most Sustainable Corporations in the World list, Prologis uses its leading position and scale to drive sustainable innovation. Over 1.1 million people work at a Prologis site, where €2.7 trillion of goods flow through its facilities every year, representing 2.5% of global GDP.

In recent years, Prologis has delivered approximately £1 billion worth of industrial and logistics investment across the West Midlands, including sites within Rugby at Prologis Park Ryton. Across the wider Midlands area Prologis has delivered major schemes at Birmingham, Coventry, Daventry (DIRFT), Fradley (Lichfield), and Solihull. Consequently, Prologis is a major developer and investor within the employment sector, and in the last decade especially, has developed significant investment and job opportunities in Coventry and Rugby, as well as the Warwickshire sub-region.

PROLOGIS®

Prologis UK owns and manages **35 million sq ft** in the UK

The only logistics developer, globally, to be awarded HRH **Terra Carta Seal** for Sustainability

£5.8 bilion in total assets under management in the UK

£50m generated in social value through the Education & training hub at DIRFT

2.5% of GDP flows through our buildings

All new Prologis buildings are **EPC A+** and **BREEAM Outstanding**

Prologis Approach to Sustainability

Prologis is a business totally committed to reducing its impact on the environment whilst building long-standing relationships with its customers and the communities close to its Prologis Parks.

Prologis is committed to measuring, reducing and mitigating its carbon emissions. For over a decade, Prologis has undertaken independently verified Carbon Lifecycle Assessments for all its new developments. This data enables the company to consistently reduce embodied carbon it progresses towards its net zero target by 2040.

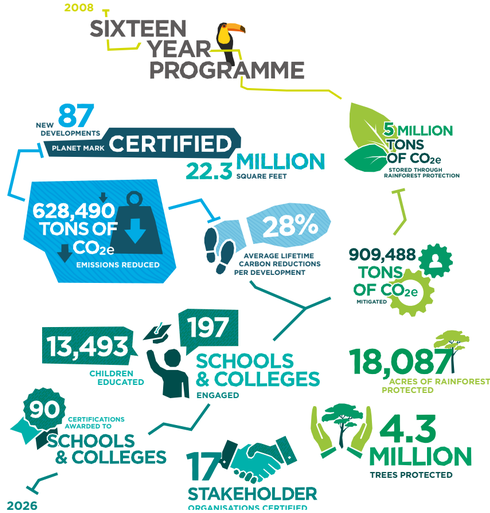
Prologis was awarded the Terra Carta Seal at the COP26 summit by HRH King Charles in recognition of its commitment to the creation of genuinely sustainable markets.

All buildings developed by Prologis since 2008 have achieved BREEAM certification, with more than 25 million sq ft of the UK portfolio achieving BREEAM Excellent or Outstanding rating. This demonstrates that sustainability has been embedded at every stage of the design and build process, and will endure for the life of the building. Building on this extensive experience Prologis targets, wherever possible, BREEAM Outstanding for all new developments. A BREEAM Outstanding rating reflects exemplary best practice and places these buildings among the best 1% in the UK.

Prologis' rooftop solar solutions meet 100% of the buildings' regulated energy demand, achieving them the highest EPC A+ ratings. This meets the UK Government definition of net zero (for regulated energy) and typically uses around 15% of the available roof area. These base build solar arrays can be further expanded across the entire roof area to help meet customers' operational energy needs.

Since 2018, Prologis' supply chain has signed-up to the companies Social Value Charter, sourcing goods and labour locally where possible, and spending time enhancing the local community, from volunteering and working with local schools and colleges, to promoting awareness of the benefits and career opportunities available within the sector.

Prologis follows a Fabric First approach to designing out embodied carbon and reducing lifetime operational energy needs across all of its Parks. It seeks to measure, reduce and then mitigate 5x the residual embodied carbon emissions through its long term partnership with the rainforest protection charity Cool Earth.



The only logistics developer, globally, to be awarded HRH Terra Carta Seal for Sustainability

Executive Summary

This document sets out Prologis' vision for the future expansion of Prologis Park Ryton. It will deliver a unique and exciting opportunity building upon one of Rugby Borough's most successful strategic employment sites by delivering a best-in-class logistics and manufacturing development.

Prologis Park Ryton West is located at the beating heart of the UK's automotive industry and the location is proven as a highly sought-after manufacturing and logistics location. Transformational investment is already occurring in the area. It has the potential to become an unrivalled location in the West Midlands.

This proposal represents an outstanding opportunity to assist Rugby Borough Council achieve its economic growth ambitions and meet the identified need for strategic employment land through the emerging Rugby Local Plan. The site performs very strongly in the Sustainability Appraisal, and is strategic employment growth option 2, which is contended to be the most sustainable and suitable growth option. Therefore, Prologis Park Ryton West should be allocated in the Rugby Local Plan.

Prologis invests in its employment parks for the long term and has the experience and capability to deliver this project. Prologis is also uniquely placed to deliver an expansion to the existing Prologis Park Ryton in a manner that is truly integrated and sustainable through the inclusion of the following measures:

- **Rugby's first dedicated on-site training hub.** It will bring transformational jobs, training and education opportunities for the local community.
- An **extensive 140 acre connected Country Park,** that will put PARKlife™ and placemaking at the forefront of the development, creating a vast area of country parkland and habitat creation for use by both site employees and the local community. In combination with Mountpark's offer, a combined Country Park totalling 140 acres will be delivered.
- Provision of SME starter units providing **opportunities for small to medium sized enterprise businesses** within the scheme to enable resilience, flexibility and open new markets.
- A fully integrated site access and **public transport strategy.**
- A **dedicated lorry park** to cater for the needs of the lorry drivers servicing the park.
- Prologis Park Ryton West will **integrate with the adjoining Mountpark site.**

Prologis Park Ryton West Will Deliver the Following Benefits

Placemaking & PARKlife™

- Landscape led site masterplan incorporating an enhanced Prologis PARKlife™ & Placemaking offer with new buildings set within high-quality green infrastructure.
- Prologis has appointed a dedicated cultural placemaking partner FUTURE\CITY to deliver integrated arts and culture, ecology skills & business innovation across the development.
- Provision of a 140 acre Country Park, incorporating significant areas of public open space, wildlife habitat, footpaths and cycle ways in accordance with Prologis' PARKlife™ & Placemaking concept. This will provide a strong sense of place and opportunities for the promotion of wellbeing. In combination with Mountpark's offer, a combined Country Park totalling 140 acres will be delivered.

Investment, Jobs and Training

- Rugby's first dedicated logistics training and education facility providing on-site training for local colleges and schools.
- Provision of Incubator and SME facilities supporting local businesses.
- £300 million of direct capital investment, supporting the growth of Rugby and the sub-region. Generating £15 million annually in business rates.
- 278,000 sq m (3 million sq ft) of the highest quality industrial and logistics space, supporting the regional manufacturing and automotive base; and opportunities for small and medium enterprises creating over 3,000 jobs.

Environmental, Social, Governance

- A net zero carbon development, including BREEAM Outstanding and EPC A+ rated buildings.
- Prologis is a committed community partner and will work closely with local community groups and the Council to execute the cultural placemaking strategy.

Prologis in **the Midlands**

In recent years Prologis has delivered approximately £1 billion of industrial and logistics investment across the Midlands including:

- Prologis Park Ryton;
- Prologis Rugby Central Park;
- Daventry International Rail Freight Terminal (DIRFT);
- Prologis Park Coventry; and
- Jaguar Land Rover's Logistics Operation centre at Solihull.

Prologis Park Ryton **The Story So Far**

For more than 10 years at Prologis Park Ryton, we are proud to have worked with Rugby Borough Council and communities to redevelop the former Peugeot factory site into a high-quality advanced manufacturing and logistics park employing well over 3,000 people.

A significant part of the site (some 40%) is occupied by the automotive industry with Jaguar Land Rover and London Electric Vehicle Company (LEVC) both having a major presence on site. Other occupiers include DHL, CEVA and Furnolic.

Prologis Park Ryton has to date delivered the following:

- 2.3 million sq ft of strategic advanced manufacturing and logistics space
- + 2,000 jobs
- Over £500 million investment
- £5.5 million rates payable annually

Net Zero Carbon in Construction

BREEAM Rated Outstanding

EPC A Rating in Operation

Site & **Context**

The site is located in a well-established and expanding concentration of employment activity which includes JLR's Whitley plant, Middlemarch Industrial Park, the Coventry Gateway development, the airport (with its consent for a Gigafactory) and the existing Prologis Park Ryton. This high level of economic activity with its focus on the automotive industry is testament to the attractiveness of the location for economic investment.

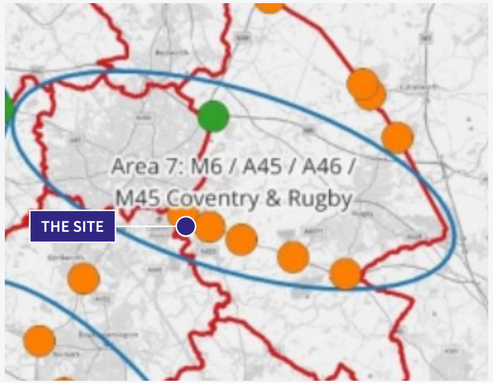
The location is extremely well located to the strategic highway network via the A45 eastbound to the M45 and M1, and the Coventry Eastern Bypass connecting it to the M6 and M69. The site extends to some 140 hectares (gross) and is located immediately to the west of Prologis Park Ryton.

The site itself is predominantly arable fields located to the west of a mixture of ribbon development along the Oxford Road. Although predominately farmland, it also includes approximately 6.5 hectares of brownfield land fronting the Oxford Road known as Marshalls Yard.

The site has direct frontage to the Oxford Road with a number of existing points of access capable of future enhancement. The site is dissected by a public right of way running east to west and bordered by another along its western boundary, both providing opportunities for enhanced community access.

The Opportunity / **Policy Context**

The site provides the optimal location to meet future employment needs in the Rugby Local Plan.



WMSESS (2024) – Road Opportunity Areas (Iceni)

Coventry & Warwickshire Employment Needs

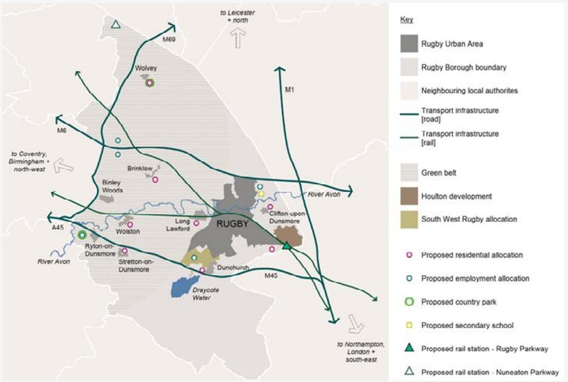
Addendum to the Coventry & Warwickshire Alignment Paper

Iceni Projects Limited on behalf of Rugby Borough Council

November 2025

Coventry & Warwickshire Employment Needs Addendum to the Coventry & Warwickshire Alignment Paper

Coventry and Warwickshire Employment Needs Alignment Paper Addendum



Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (2024) (Iceni)

The Council's own evidence base, The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA), makes clear that there is a significant need for strategic employment sites and also that Rugby plays an important regional role in providing such strategic land. **The evidence base also identifies potential corridors for delivery of strategic employment land across the region and this includes the A45/M45 corridor where Prologis Park Ryton is located.** It also notes that the greatest concentration of sites are likely to arise in the north and west of the region, again where Prologis Park Ryton is located.

The West Midlands Strategic Employment Sites Study (WMSESS) (2024) identifies the need for 1,920-2,282ha of strategic employment sites over the period 2022-45 in the West Midlands. Areas of optimal growth have been identified, called Opportunity Areas. The Site has been identified within Opportunity Area 7 – M6 / A45 / A46 / M45 Coventry & Rugby.

Following the release of the WMSESS, the Coventry and Warwickshire HEDNA – WMSESS Alignment Paper supplemented the original HEDNA. There is now an Addendum to the Alignment Paper. It apportions 59-134 ha of strategic employment land within Opportunity Area 7. **Given the constraints in delivering any strategic employment land in Coventry and Warwick, Rugby must deliver growth within Opportunity Area 7 to meet unmet needs through its Duty to Cooperate.**

Given that the vast majority of strategic employment opportunities are located in the Green Belt, it is clear the policy and evidence base context exists for the exceptional circumstances required to justify Green Belt release to meet such needs through the local plan review.

Prologis Park Ryton West, when tested against RBC's policy requirements for new strategic employment sites, will:

1) Deliver growth in a sustainable location well connected to the strategic highway network.

2) Meet & exceed the reductions in carbon emissions by delivering a beyond Net Zero development.

3) Provide benefits to meeting the local community needs through on-site placemaking initiatives.

In addition to the above, the expansion of an existing park will provide unique opportunities, such as the sustainable transport solution that Prologis has introduced at DIRFT where a technology-enabled shuttle bus service has been set up through Zeelo which provides a convenient, hassle free and cost-effective addition to public bus services.

The Vision **& Proposal**

Prologis **will deliver a best-in-class logistics and manufacturing development that will raise the bar in sustainable employment development** going beyond net zero in operation as well as delivering **BREEAM Outstanding and EPC A+ rated buildings**.

Prologis invests in its employment parks for the long term and is uniquely placed to deliver an expansion of the existing Prologis Park Ryton in a manner that is truly integrated and sustainable through the inclusion of the following measures:

- **Rugby's first dedicated on-site training hub** to serve the existing and new employment park. This will bring transformational jobs, training and education opportunities for the local community.
- **A 140 acre Country Park**, continuing the PARKlife™ project on the existing Prologis Park around The Dell and creating a vast area of country parkland and habitat creation for use by both site employees and the local community. In combination with Mountpark's offer, a combined Country Park totalling 140 acres will be delivered.
- A **dedicated lorry park** to cater for the needs of the lorry drivers servicing the park.
- Provision of **incubator units and SME space** to provide support for local businesses.

It will support economic growth, inward investment and bring transformational jobs, training and education opportunities to Rugby and the region. It will deliver:

- 278,000 sq m (3 million sq ft) of the highest quality industrial and logistics space, supporting the regional manufacturing and automotive base.
- Deliver over 3,000 jobs.
- Over £300 million of direct capital investment, supporting the growth of Rugby and the sub-region which represents a total economic output of some £850m from the construction stage alone.
- Enhance and provide a fully integrated site access and public transport strategy.
- Ability to integrate with any adjoining development at the Mountpark site.

Warwickshire County Council

Warwickshire
Property & Development

Partnership – Prologis Park Ryton West

Prologis is working in partnership with Warwickshire County Council (WCC) and the Warwickshire Property Development Group (WPDG) to deliver small to medium size buildings as part of the development, specifically targeting the SME sector, to support new start up companies bringing new investment and innovation to Rugby.

8,000 sq m of small-medium sized units (ranging between 185 and 1,500 sq m) will be delivered through this partnership.

Prologis Park Ryton West
Cultural Placemaking

Prologis Park Ryton West will pioneer our new approach to embedding a cultural placemaking strategy.

The scheme will raise the bar through the design and delivery of 12 placemaking projects and four placemaking themes with one placemaking trail – The Ryton Green Way.

Utilising the proximity to residential areas, our proposal will provide complimentary community and learning amenities throughout the development for employees, visitors and the community.

01 CULTURAL PLACEMAKING TRAIL

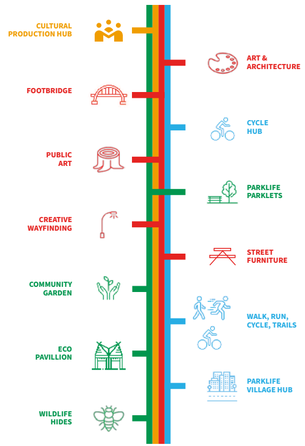
12 CULTURAL PLACEMAKING PROJECTS

- **PUBLIC ART** – Celebrating local heritage and culture
- **PARKLIFE PARKLETS** – Micro gardens for rest and relaxation
- **CULTURAL PRODUCTION HUB** – Space for WM and UK creative industry tenants
- **FITNESS AND LEISURE ROUTES** – Exercise and nature connection for all
- **STREET FURNITURE** – From bins to bollards and benches with PARKlife character
- **CYCLE HUB** – Repair, retail, hire, and storage
- **ECOLOGY PAVILION** – Education and information hub
- **FOOTPATH** – Link to village
- **WILDLIFE HIDES** – Getting close to nature
- **WAYFINDING** – Creative signage and interpretation for our sites users
- **PARKLIFE VILLAGE HUB** – Our commercial and wellness heart
- **ART + ARCHITECTURE** – Our big sheds as art

04 CULTURAL PLACEMAKING THEMES

- SKILLS & INNOVATION
- ECOLOGY
- CULTURE
- ACTIVE TRAVEL

Prologis are working with a dedicated placemaking team to enhance our PARKlife™ approach. The plan left, illustrates our unique approach as a long term investor and developer to make Prologis Park Ryton West a long term successful place where communities and employees can thrive.



12 placemaking projects to be embedded through the development

The **Hub**

The expanded Prologis Park Ryton will deliver the first dedicated on-site centre for logistics job training and education in Rugby to work with local employers, schools and the community. It will provide significant social and economic benefits, including:

- **Industry recognised qualifications:** Prologis has unparalleled knowledge and delivery expertise in the employment sector and its Prologis Warehouse Logistics Training Programme (PWLTP), will provide industry recognised qualifications to assist young, unemployed and disadvantaged people pursue a career in the logistics sector.
- **High quality training:** The PWLTP aims to train people leaving education and re-skill the unemployed by equipping them with the knowledge needed to pursue a career in logistics. Prologis has partnered with Goodwill Solutions Supply Chain Open Education Academy (SCOEA) to provide targeted education and training for the supply chain sector.
- **Wide ranging job opportunities:** Our research has shown that the logistics sector provides a broad range of careers and job opportunities. These are not limited to warehouse and fork-lift truck operatives but include IT and automation engineers, customer service and HR advisors and data analysts.

The first PWLTP at DIRFT in Daventry has trained over 600 people and has already generated over £31 million in social value.

The Hub at DIRFT

The Hub at DIRFT

Sustainable **Transport Interchange**

Accompanying The Hub will be a Sustainable Transport Interchange, creating a central bus interchange for new and enhanced services from the surrounding area. We will also offer an additional on demand bus service powered by the Zeelo app, which is a smart bus and managed transportation platform, where routes are dynamically updated based on demand, optimising pick-up points and frequency to ensure the most efficient journey possible. The result is a convenient, hassle-free and cost-effective solution that helps employees get to work faster and more reliably than traditional public transport.

From the interchange, an electric internal shuttle will circulate around the parks, delivering a seamless, site-wide transport service. The site already has a passing bus service directly linking it to Rugby and Coventry (Routes 25 and 25A) providing an opportunity for network enhancement and a possible service re-routing through the site.

The proposal not only benefits the proposed Ryton West development, but also the existing Prologis Park Ryton site, as it will increase bus frequency and routes, as well as pedestrian and cycle connectivity to this site also.

PARKlife™

The site will deliver an extensive combined 140 acre Country Park for public use across Prologis and Mountpark land interests.

The scheme is a landscape-led masterplan, incorporating an enhanced Prologis PARKlife™ & Placemaking offer with new buildings set within a strategically planned and cohesive network of high quality natural and semi-natural areas including blue and green infrastructure designed that delivers ecological, social, and economic |benefits where people, nature and communities thrive.

It is proposed that the Country Park would be divided into different, functional areas (zones) designed to integrate with the surrounding environment.
These areas could include:

- Green Infrastructure
- Biodiversity Zones/Habitats
- Sustainable Drainage Systems (SuDS)
- Public Open Space / Amenity Areas
- Recreational / Activity Zones.

Those working within both the existing and proposed employment units, together with residents living in the area, will be able to enjoy walking and cycling routes throughout the site, linking with improved public rights of way and The Dell.

Site **Delivery**

Prologis' proposals for the site have been informed by a thorough understanding of the site's baseline conditions and through decades of experience developing the industry's leading portfolio of high-quality manufacturing and logistics parks.

Flood Risk & Drainage

The River Avon follows the western boundary of the site and those parts of the site that lie within its flood extent will be retained as green infrastructure as part of the proposed Country Park. The areas proposed for built development lie entirely within Flood Zone 1.

An initial technical drainage assessment has demonstrated that the site can deliver a high-quality sustainable surface water drainage solution with on-site attenuation features.

Heritage

There are no designated heritage assets (Scheduled Monuments, Registered Parks and Gardens, Listed Buildings or Conservation Areas) either within the site or within its immediate environs and there will therefore be no direct or indirect impact on any built heritage assets.

The site is not in a particularly archaeologically sensitive area but may have some archaeological interest. Accordingly, a programme of evaluation will be undertaken at application stage and appropriate mitigation measures undertaken if required.

Ground Conditions/Minerals

The site has no history of potentially contaminating uses. It does however fall within a sand and gravel safeguarding area within the Minerals Local Plan and part of the site (Coney Grey Farm) is an allocated site for extraction. A full assessment of extraction viability would be undertaken at planning application stage and if viable, the mineral reserve could be extracted as part of the delivery of the development.

Utilities

A review of utilities records has demonstrated that they do not present any abnormal issues or major diversions and there are no capacity constraints to bringing the site forward.

Landscape & Visual

The site and its immediate context are not covered by any landscape protection designations at either a national or local level. The site is well contained with a limited zone of visibility.

Views from the north are very limited due to the topography and existing vegetation. Views from the east are mostly screened by existing development along Oxford Road, and Ryton village is completely screened from the site by intervening built form and vegetation. From the south and west the proposal would be more visible, albeit the layered topography and undulating nature of the landscape does afford the site some screening.

The most positive landscape features are the mature trees and hedgerows along site boundaries and field edges and the majority of these will be conserved as part of the scheme design. Further extensive native planting and habitats will be created and managed to deliver a robust landscape setting to the proposed development. The land situated along the western boundary will be retained as green space and used to form a substantial Country Park, integrating with the new Country Park to the west of the river.

Highways, Access & Transport

An initial high-level assessment has been undertaken of the capacity of the surrounding highways network and initial discussions have been held with National Highways and Warwickshire County Highways. From this work it is clear that the proposal can be satisfactorily accommodated within the network.

The site itself would take access off the Oxford Road in two locations. At the northern end this would be from a new fourth arm off the existing roundabout access to Prologis Park Ryton. At the southern end it would be via a new roundabout located approximately 350m north of the Oxford Road/Leamington Road junction. Both accesses have been assessed as being safe and suitable.

There is already a successful HGV routing agreement for Prologis Park Ryton and this would be carried through the new development ensuring that restrictions on HGVs accessing the A45 via the village along Leamington Road would continue.

The proposal includes a significant Country Park with public access enabling enhancement and expansion of the existing right of way network that runs through the site, and providing pedestrian and cycle access throughout the site.

There is therefore no transport reason preventing the development of the site.

Ecology & Biodiversity

There are no nationally or locally designated wildlife sites either within the site or within its immediate environs and there will therefore be no direct or indirect impact on any important wildlife areas.

The site is predominantly in arable use and is dominated by habitats of limited ecological interest. The habitats of greater ecological value, including hedgerows and mature trees, will for the most part be retained and integrated as part of the landscaping proposals for the site.

In regard to protected species, a full suite of seasonal protected species will be undertaken as part of any detailed planning proposals and mitigation incorporated where necessary.

The proposed scheme design will be landscape led to provide habitat enhancements which will deliver significant biodiversity enhancement with the aim to exceed statutory biodiversity net gain requirements.

Availability

Prologis has a proven track record for deliverability and is looking to work with the Council and local communities through the plan-making process. The scheme is deliverable from adoption of the Plan in 2027.

There are no technical constraints which would prevent the future delivery of the proposals. The site is available, deliverable and viable.

Summary & **Conclusions**

- The expansion of Prologis Park Ryton represents an outstanding opportunity to assist Rugby Borough Council achieve its economic growth ambitions and meet the identified need for strategic employment land through the emerging Rugby Local Plan. The site performs very strongly in the Sustainability Appraisal, and is strategic employment growth option 2, which is contended to be the most sustainable and suitable growth option. Therefore, Prologis Park Ryton West should be allocated in the Rugby Local Plan.

- The proposals will raise the bar in sustainable development by being net zero in operation, as well as delivering BREEAM Outstanding and EPC A+ rated buildings.

- Prologis invests in its sites and communities for the long term and has the experience and capability to deliver this project. Prologis is uniquely placed to deliver an expansion of the existing Prologis Park Ryton in a manner that is truly integrated and sustainable. The proposal will deliver:

  - 278,000 sq m (3 million sq ft) of best-in-class logistics and automotive supply chain development, supporting over 3,000 jobs.

  - Rugby's first dedicated logistics training and education facility providing on-site training for local schools and the community through Prologis' Warehouse Logistics Training Programme (PWLTP).

  - A 140 acre Country Park continuing the PARKlife™ project on the existing Prologis Park around The Dell and creating a vast area of country parkland and habitat creation for use by both the site occupiers and the local community. It has the ability to be connected to adjoining parkland at Mountpark's site. The combined Country Park would total c. 140 acres.

  - A fully integrated site access and public transport strategy including a brand new Sustainable Transport Interchange for bus routes into/from the site and an electric shuttle bus serving each unit on site.

The Hub at DIRFT

Prologis Park Pineham

Prologis Park Pineham

Prologis Park Hams Hall

PROLOGIS®

prologis.co.uk

Appendix 5 – Rugby Local Plan Housing Background Paper 2017

RUGBY BOROUGH LOCAL PLAN

2011-2031

HOUSING BACKGROUND PAPER

SEPTEMBER 2017

a local housing need. The current policy regime (as set out in the Core Strategy) applicable to these settlements has proved to be too restrictive and resulted in no development of this nature being delivered. Land that is available within Local Needs Settlements is therefore not being put into use and housing proposals that might be achievable are not coming forward. The Council considers that in the wider context of the overall housing need of the Borough and the overall sustainability of rural populations in Local Needs Setlements the existing policy approach must be changed.

3.98. To reflect this change the Publication Draft Local Plan renames Local Needs Settlements as Rural Villages. This change enables small scale developments (non-strategic) to be built within these villages which cannot currently come forward without the need to demonstrate a local need. This change will provide another source of dwellings, albeit small, that could contribute to the mix of sites and location to support the supply of housing. No Green Belt boundary alterations will be required.

Rural Settlements: Implications for the assessment of spatial options

3.99. The approach outlined above for the Rural Area is consistent with Spatial Option 3: Wider Focus (see Figure 9 above) with the primary focus being Rugby urban area with more minor boundary alterations at the Main Rural Settlements and small scale development in smaller settlements.

New Main Rural Settlement

3.100. As demonstrated above the Council would be capable of demonstrating a five year land supply at the point of adoption and there will be 15,369 dwellings delivered within the plan period. However, beyond the first five years of the plan adoption the focus for delivery will be the Rugby urban area where it is anticipated there will be 21 outlets operating, 11 of which at the South West Rugby Allocation and 6 at the Rugby Radio Station site.

3.101. The Housing Market Delivery Report at paragraph 7.17 highlights that the Council should consider the "balance" of sites in the borough, and to maximise delivery consider growth locations away from Rugby Town. The Local Plan therefore proposes the allocation of a new Main Rural Settlement to ensure that there is an additional market for housebuilders thus providing a different market to the urban area. This affords greater certainty of continued ability to demonstrate a housing land supply position throughout the plan period.

Coventry and Hinckley urban edge

3.102. The Preferred Options consultation in 2015 proposed land at Walsgrave as a new settlement for 1,500 homes. Walsgrave is in close proximity to the Coventry urban edge. The Housing Delivery Study identified that the Coventry urban edge presented an opportunity to provide further development in a sustainable location, tapping into a housing market separate to that at Rugby town and therefore increasing the quantity of housing that is delivered across the Borough as a whole. This allocation would require Green Belt release. Land can only be removed from the Green Belt in exceptional circumstances. At the time of the Preferred Options consultation the proposal was justified in order to meet the local plan housing target given the lack of alternative sites outside of the Green Belt to deliver the strategic allocation of a new settlement.

3.103. The Walsgrave site is not included in the Publication Draft Local Plan as issues that were identified following the Preferred Options remain. Since the Preferred Options consultation, the deliverability of Walsgrave within the plan period has become more uncertain. Highways England can provide no certainty on timescales for the necessary enabling works to the A46 in their work programme. In addition 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.

3.104. Communication received from the promoters of Walsgrave, Roxhill, in April 2017 proposed a mixed use development of 1,500 homes and up to 2,000 jobs through delivery of a 2 million sqft logistics park. It is estimated that this would be around 61ha of employment land. The site promoter is of the view that inclusion of employment land is necessary to undertake the A46 work to enable the site. The Local Plan Preferred Options consultation did not include any element of employment at Walsgrave.

3.105. The NPPF requires that Local Plans align their housing and employment targets and this will be tested at Examination. If the Local Plan were to include the extent of employment proposed by Roxhill, then additional housing allocations would be required and the Local Plan housing target would need to increase.

3.106. A call for sites exercise was held at the same time as the Preferred Options consultation to ensure all options for growth allocation were considered before progressing the Local Plan. Land at Lodge Farm was promoted through this process. The site is in a countryside location with direct access onto the A45. It has no on site constraints or any in close proximity which could either prevent or constrain the site coming forward. The emergence of a developable and deliverable non-Green Belt site meant the test of exceptional circumstances required for the Green Belt release of the Walsgrave proposal could no longer be justified. Walsgrave was subsequently removed from the Publication Local Plan. Furthermore, although Rugby Borough Council is delivering 2,800 homes of unmet need from Coventry, it is not identified as a separate target to Rugby's housing need. National planning guidance does not prescribe that this unmet need is located adjacent to Coventry.

3.107. Appendix 3 provides more detail on the consideration of Walsgrave following the Preferred Options consultation and of the decision to propose the allocation of Lodge Farm site as a new Main Rural Settlement.

APPENDIX 3: EXTRACT PREFERRED OPTIONS HOUSING BACKGROUND PAPER

NEW SETTLEMENT

Preferred Options Local Plan - Walsgrave Hill Farm proposed allocation

1.1 The Preferred Options Local Plan proposed the release of land from the Green Belt to accommodate a new settlement, at Walsgrave Hill Farm. Section 4, the PO HDBP, 2015 details the justification for inclusion of the Walsgrave Hill Farm site as a proposed allocation for housing delivery which will not be repeated here. However, it is worth noting the key considerations in proposing the release of the site and also reasons why this is no longer supported through the Publication Draft Local Plan.

1.2 A key part of this was justifying releasing land from the Green Belt. The NPPF is clear about the permanence of Green Belt boundaries and how they can be changed. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of Local Plans.

1.3 In considering the different spatial options for delivering the growth targets of the Local Plan section 4 of the PO HDBO, 2025, concluded the necessity of a new settlement in addition to growth a Rugby town and small scale growth at Main Rural Settlements (MRS). In identifying the location of the new settlement consideration was had to whether any of the existing Local Needs Settlements (LNS) could be expanded to a sufficient size to support a range of services similar to that of a MRS. No such sites were identified at any existing LNS to do this. There were also no sites located within the open countryside of a suitable size to be a MRS but there were a number of sites of this scale located within the Green Belt.

1.4 The PO HDBP, 2015 concluded that the exceptional circumstance had been met for the land to be released from the Green Belt. This led to the Local Plan Preferred Options allocating Walsgrave Hill Farm for 1,500 dwellings as a new MRS. The allocation boundary afforded the most self-contained site in comparison to the other Green Belt sites considered through the SHLAA, published alongside the Preferred Options in December 2015. It was concluded that the exceptional circumstance had been met for release of land from the Green Belt as no non Green Belt location had been identified through the SHLAA process that was capable of becoming a MRS. Furthermore the location of Walsgrave Hill Farm was considered to offer another housing market to that of Rugby town to deliver from at the same time as the proposed urban allocations of South West Rugby, Coton Park East, Rugby Radio Station and Rugby Gateway. This will then help in meeting the annual housing target by varying the portfolio of size and location of sites as advocated by the GL Hearn Housing Deliverability Study.

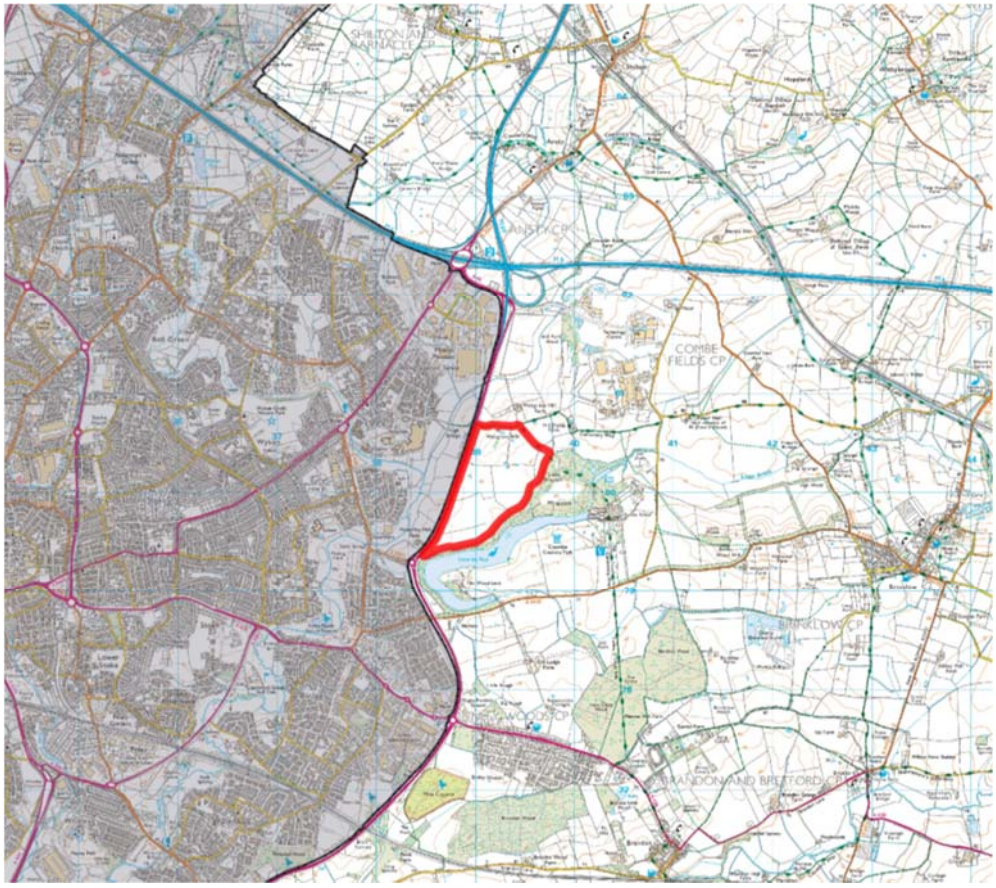


Figure 1: Location of the Walsgrave Hill Farm site

1.5 Delivery of this site is reliant upon the introduction of a new graded junction on the A46. Discussions with Warwickshire County Council Highways and Highways England (in conjunction with Coventry City Council) confirmed that the work was planned on the A46 and it was contained in Governments Road Investment Strategy for the 2015/16 – 2019/20 time period. The work on the A46 would enable a new junction which will allow for access to land within Rugby Borough.

1.6 In consideration of the above factors, the Preferred Options Local Plan proposed the release of Green Belt to accommodate a new settlement at Walsgrave Hill Farm. The PO HDPB, 2015 concluded on this point that the site selected represented the best option overall on location, deliverability, infrastructure and impact on the Green Belt. Furthermore, it was considered instrumental to the achievement of the housing target.

Preferred Options Consultation Responses

1.7 The Council consulted upon the Preferred Options Local Plan in December 2015 with the inclusion of Walsgrave Hill Farm allocation for residential development. The Council received representations which lead to a re evaluation of the proposed allocation. These are detailed below.

1.8 Highways England, who are a statutory consultee, made the following observation on the enabling of the site:

"Delivery of the site to the South of Walsgrave Hill Farm is reliant on Highways England's proposal for a new grade separated junction on the A46 at Walsgrave. It is suggested that this scheme will be available by 2022. However, based on current information the completion date of the scheme could be 2025 or beyond unless significant developer contributions can be secured."

1.9 The promoter of the Walsgrave Hill site consultation response stated that land to the north of the site, which is also within the same landownership, should be allocated for circa 90 hectares of employment land. The promoter considered that the employment allocation would be the enabler for the A46 work. This would help bring forward the delivery of housing on the site prior to the Local Plan Preferred Options proposed commencement of 2022.

1.10 Both Highways England and the site promoters' responses raised concerns about continuation of the proposed allocation within the Local Plan of Walsgrave Hill Farm. With Highways England raising doubts on the timing of when the A46 improvements would be delivered, this questioned how much the site could be relied upon to deliver housing within the plan period.

1.11 Although the site promoter proposed a solution to bring forward the enabling works sooner, this would be of detriment to ability of the Local Plan to meet its growth targets. The employment land target for the entire plan period is 110Ha, so an increase of anything up to 90Ha would be significant. It would not be in accordance with the Coventry and Warwickshire Employment Memorandum of Understanding (MoU) in relation to how the unmet employment needs of Coventry needs would be distributed throughout Warwickshire. On this point, as set out within the Employment MoU, as is the case with unmet Coventry housing need, Rugby Borough Council has accommodated some of Coventry's unmet employment need at Ansty and Ryton as set out within the Employment Background Paper.

1.12 Furthermore, as detailed in the Employment Background Paper, the NPPF requires that Local Plans must align their housing and employment growth within their plans. This is something which Inspectors have considered in detail during Examination in Public of Local Plans. The Employment Background Paper explains how the Publication Local Plan housing and employment land growth targets are aligned. An increase of up to 90Ha of employment land, which would almost double the employment target for the plan period, would inevitably require a significant increase in the housing target for the plan period growth to be aligned.

1.13 Such complications questioned the availability and deliverability of the site for housing delivery within the plan period and on the back of this questioned the continued exceptional circumstance for release from the Green Belt. Based on the Highway England's Preferred

Option response, the best case scenario for housing delivery within the Plan Period, should the site commence in 2025, is 450 dwellings as opposed to 750 dwellings as previously assumed in the Preferred Options consultation. If this best case scenario were to be followed through, the shortfall of 300 dwellings would need to be found in another location.

1.14 To understand fully the potential for retaining the site within the local plan a meeting was held on the 25th May 2016 with Highway England, the site promoter and Coventry City Council. Although the site promoter stated that the site could come forward as a residential scheme and contribute to the A46 improvements, the preference was for further land to be allocated for employment uses. The site promoter tabled a scheme for the A46 graded junction but it was highlighted that the benefits of the scheme would not be realised based on a residential only scheme.

1.15 Highways England reaffirmed that the graded junction was a commitment in the Government's Regional Investment Strategy. The anticipated delivery was as originally advised to be by 2022, subject to programming. It was discussed that Highways England do not have scheme drawn up for the graded junction improvement and the site promoter's scheme would not be deliverable without the employment allocation. Following the meeting Highways England and the site promoter looked to hold separate discussions with the aim of creating a scheme to enable the site as a joint venture. No further update has been received on the progress of this work.

1.16 Although there was a clear keenness on the part of both parties to bring forward the grade improvement to the A46 and bring forward the site, neither were able to provide the deliverability of the enabling work alongside a residential only development that could meaningfully contribute towards the plan period.

1.17 Significant consultation responses to the proposed Walsgrave Hill Farm allocation were also received from Historic England and Natural England both of whom are statutory consultees. The Historic England response highlighted that the site is located on rising pastoral land between the A46 and Coombe Park, a popular public grade II* registered park and garden (Capability Brown) and conservation area. The park also contains numerous highly graded listed buildings including Coombe Abbey (Grade I listed building). Historic England raised concerns that no evidence had been gathered to demonstrate how an understanding of the proposed allocation site contributes to the significance of the heritage assets and how this informed the principle of development, nor without prejudice, the capacity and necessary design response. To further understand their concerns a meeting was held with Historic England on the 29th June 2016 where concern was raised again about the potential impact of development would have on the Capability Brown Registered Parks and Garden, which was viewed as being of national significance.

1.18 Natural England's consultation response highlighted that the Walsgrave Hill Farm site is directly adjacent to Coombe Pools Site of Special Scientific Interest which is noted for breeding birds and as a Country Park with managed access, which could have suffer potential adverse effects from development in close proximity of the designated site. Natural England requested that work is undertaken to understand the impact of the site on the adjacent SSSI designation. Natural England also advised that the site appeared to include areas of Grade 2 and Grade 3a Best Most Versatile land.

1.19 The responses from Historic England and Natural England were shared with the site promoter to try and establish how the site could mitigate against the concerns raised. A meeting was held with the developer where a plan displayed buffer zones to mitigate the sites impact from the concerns raised. However no plan or any evidence informing the buffers has been submitted to the Council. It is also viewed that with no agreed access arrangements into the site the impact on the SSSI and the historic assets cannot be judged.

1.20 Further to this, the Preferred Options Local Plan Consultation Responses Summary, September 2016, summarises the consultation responses to this proposed allocation: Whilst the location of the Walsgrave Hill Farm allocation on the Coventry edge was supported by some, the required Green Belt release was not supported by others who argued the exceptional circumstances required to justify such release did not exist and the allocation would therefore not be compliant with the NPPF.

Lodge Farm

1.21 The express purpose of the further call for sites that accompanied the Preferred Options consultation was to ensure the Council had appraised all potential site options through the SHLAA before progressing further with the Local Plan. This process identified a site submission

at Lodge Farm, a site located entirely within the countryside to the south of Rugby town, as shown in the plan below.

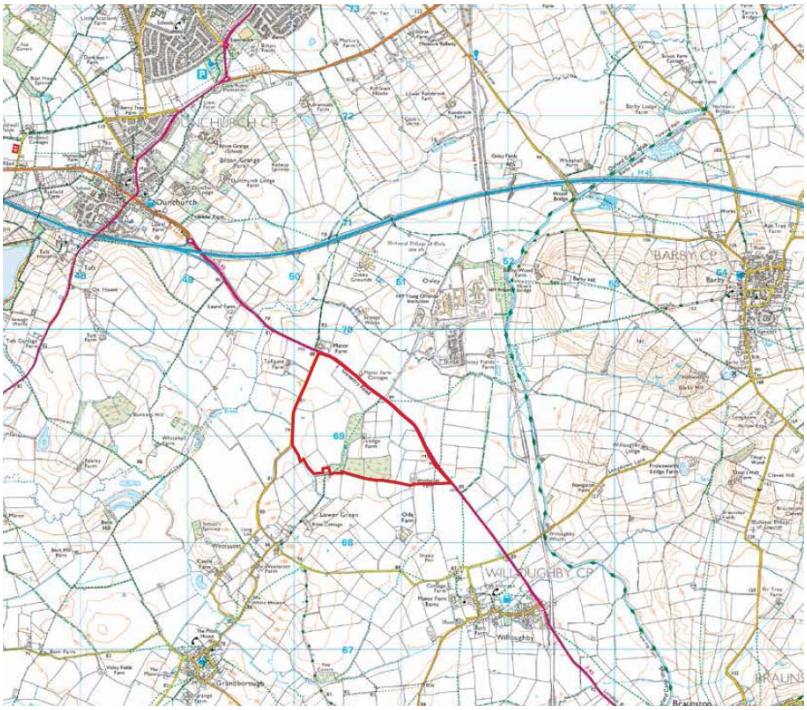


Figure 8: Location of the Lodge Farm site

1.22 The SHLAA 2016 updated assessed the Lodge Farm submission in terms of availability and suitability. The site is deliverable as it can be directly accessed off the A45 without any enabling works required. Furthermore, there are no designated historic asset or natural environment designations onsite or in close proximity which could either prevent or constrain the site coming forward. In addition to this the site is located entirely within Flood Zone 1 which the Environment Agency defined as being of Low Probability (of flooding). There are no other statutory constraints that are present on the site.

1.23 Turning to the consideration of highway constraints, the site can be accessed directly off the A45 with no strategic enabling work required. However, the impact on the network of the likely vehicle demands be generated from Lodge Farm were modelled alongside all other proposed Local Plan allocations. The outputs of this modelling are contained within the Strategic Transport Assessment (STA).

1.24 The STA concluded that the allocation of Lodge Farm will result in an increase in vehicle demands at Potsford Dam and Dunchurch Crossroads. This indicates that Lodge Farm trips will need to be considered when defining any highway mitigation in that area. On this basis the phasing of Lodge Farm will be reliant on the South West Link Road network being in place to enable the site to be delivered. However, the STA does note that the level of vehicle demands from Lodge Farm at Dunchurch Crossroads are lower than the levels likely to occur without the South West Link Road network in place.

1.25 This necessity for the South West Link Road network to support the Lodge Farm allocation is therefore reflected in Publication Draft Local Plan Policy DS10: Lodge Farm and also the Infrastructure Delivery Plan which assume the SWLR network will support delivery of the site. Both the policy and the IDP assume offsite financial contributions are required from Lodge Farm to deliver the SWLR network.

Duty to Cooperate

1.26 Given the proximity of the site to the administrative boundary with Northamptonshire and Daventry District Council, the Council has sought to fulfil its duty in bringing forward the site as an allocation. To this end, the Council has met with Daventry District Council to discuss the expectation of the site in terms of housing delivery and also associated infrastructure. In addition the Council has, along with Warwickshire County Council Highways and Education met with Daventry District Council and Northamptonshire County Council Highways and Education. The separate Duty to Cooperate Paper provides more detail on the discussion.

Publication Draft Local Plan – Lodge Farm proposed allocation

1.27 Whilst the Preferred Option proposed allocation of Walsgrave Hill Farm, with the site benefiting from being adjacent to Coventry, where some of the housing target is derived, the emergence of a developable and deliverable non Green Belt site means the NPPF exceptional circumstances for the Green Belt release can no longer be justified.

1.28 This is also coupled with the uncertainty of how Walsgrave Hill Farm site would take account of historic and natural environment constraints and therefore address the concerns raised by statutory consultees. Greater certainty on the timescales and funding for the access arrangements into the site would also be required in order for the Council to be able to demonstrate that the site was deliverable within the plan period.

1.29 Even if mitigating solutions were to be identified to address the constraints to delivery at Walsgrave Hill Farm, the NPPF is clear that exceptional circumstance must be present to justify release land from the Green Belt. With an alternative available non Green Belt site which does not have the same constraints to delivery, it is very difficult to justify that the exceptional circumstances exist. As such the Publication Draft Local Plan proposes allocation of Lodge Farm for residential development.

1.30 Although located in a rural area, the allocation of Lodge Farm as a new settlement will be of sufficient size to support onsite services and access to facilities. The site also has access to Rugby and Daventry with the potential to improve the existing bus service. It will become the largest Main Rural Settlement in the Borough. The Rural Sustainability Study demonstrates the level of services the existing Main Rural Settlements in the Borough can sustain to support a rural population. Publication Local Plan Policy DS10 seeks to achieve this level of service provision through a local centre to be incorporated into the masterplanning of the site.

Appendix 6 – Extracts from Inspector's Report into the Rugby Local Plan 2017

The Planning Inspectorate

Report to Rugby Borough Council

by Mike Hayden BSc (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 27 March 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Rugby Borough Local Plan 2011-2031

The Plan was submitted for examination on 14 July 2017

The examination hearings were held between 23 January-1 February and 17-26 April 2018

File Ref: PINS/E3715/429/5

70. Whilst the Housing MoU for Coventry and Warwickshire indicated that the most sustainable spatial options for redistributing Coventry's unmet needs are on the edge of Coventry and in growth corridors, addressing the shortfall through extensions to principal urban areas within the sub-region also scored positively in the assessment of spatial options [49]. An important principle underpinning the MoU is the 'sovereignty' of each Council to prepare a local plan according to a locally derived spatial strategy. Although the Plan does not provide for its share of Coventry's unmet housing needs on the edge of Coventry, the scale of housing development proposed at Rugby, as one of the sub-region's principal urban areas, is capable of meeting those needs in a location with good access to employment and higher order facilities in Coventry by means of public transport, within 11-12 minutes by train from Rugby station. In addition, the four proposed MRS allocations at Ryton on Dunsmore, Binley Woods and Stretton on Dunsmore are close to the urban edge of Coventry and well connected to it by the strategic road network (via the A46 and A45). All would contribute to meeting unmet housing needs of Coventry in locations and at a scale which would not give rise to unsustainable commuting.

71. Further the strategically significant employment sites at Ansty Park and Ryton, which I consider in more detail under issue 9 below, have already made a significant contribution to meeting the borough's apportionment of the unmet employment land needs of Coventry since the start of the Plan period, in locations close to the edge of Coventry with easy access to the strategic road network (A46, M6 and A45/M45). In combination with the employment allocations at Coton Park East, South West Rugby and Rugby Radio Station, this is justified as the most appropriate spatial strategy and distribution to meet the employment land requirements of Rugby and the unmet needs of Coventry. Overall therefore, I am satisfied that the development strategy, as modified, will address the unmet needs of Coventry in a way that is consistent with national policy and the delivery of sustainable development.

72. In reaching this conclusion, I have considered the merits of potential locations on the eastern edge of Coventry, including the site at Walsgrave Hill Farm (WHF), which was identified for development in the Preferred Option draft of the Plan, but not taken forward in the Publication draft Plan. The advantage of these sites is that they would serve to meet Coventry's unmet needs in locations which afford easier access to the city's employment opportunities and facilities. However, land on the edge of Coventry within Rugby borough lies within the Green Belt. The NPPF establishes that Green Belt boundaries should only altered in exceptional circumstances and that regard should be had to their permanence in the long term, using physical features likely to be permanent[50]. 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. The fact is that Rugby's apportionment of the unmet housing needs of Coventry can be met in sustainable locations outside the Green Belt and on smaller scale sites at the MRSs, which I conclude under Issue 5 would not lead to unacceptable harm to the purposes of the Green Belt. This does not support

[49] Appendix 3 to the Housing MoU (at Appendix 1 to LP05)
[50] Paragraphs 83 and 85 of the NPPF

the case for exceptional circumstances for the alteration of Green Belt boundaries on the edge of Coventry within this Plan.

73. 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[51]. 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.

74. I also heard and received written evidence[52] about the potential for the WHF site to fund improvements to the A46 Walsgrave junction and to provide a dedicated emergency access to the University hospital at Walsgrave on the edge of Coventry from that junction. I acknowledge the importance of the A46 Coventry junctions scheme as part of the government's Roads Investment Strategy (RIS) 2015-2020 to tackle congestion on this route. I note that the Department for Transport (DfT) is taking a phased approach to the scheme, progressing with the Binley junction first, before determining the appropriate solution for the Walsgrave junction, which could be either an at-grade or grade separated scheme. Ultimately, the appropriate scheme and the timing, funding and prioritisation for the Walsgrave junction are matters for the DfT to determine as part of the RIS. But it is clear from the evidence that it is still the intention of the DfT to deliver a scheme for the Walsgrave junction and that this is not dependent on development at WHF.

75. The need for a dedicated emergency access to the University hospital is clearly an important piece of infrastructure for Coventry City and the sub-region, to provide a less congested 'blue light' connection to the strategic road network. The site through which this would be constructed from the Walsgrave junction lies within the Coventry City boundary on the western side of the A46 at WHF and is allocated for 900 homes in the Coventry Local Plan. Whilst the emergency access is dependent on the DfT scheme for the Walsgrave junction, a scheme is being brought forward through the RIS. The housing allocation in the Coventry Local Plan states that the site will incorporate the 'blue light' access and the City Council will facilitate and work with Highways England on the A46 junction. Evidence from Coventry City Council for the examination of the Coventry Local Plan[53] states that the delivery of this site is not dependent on land within Rugby borough at WHF being allocated for development. The fact that a grade separated scheme and the emergency access could be delivered earlier as part of a development of 1,500 homes and 55 ha of employment land at Walsgrave Hill Farm, does not constitute exceptional circumstances to justify the release of a significant area of GB land for a development which is not required to meet the agreed local or sub-regional employment or housing needs.

76. Returning to the impacts of the development strategy, given the scale and distribution of development proposed in the Plan, I recognise the potential for the development strategy, even as modified, to have negative effects on the

[51] Appendix 3 to the Housing Background Paper (LP11)
[52] Examination documents OTH23, OTH32 and OTH32a
[53] Page 18 of Examination document OTH20

Appendix 7 – WPDG Letter of Support

Warwickshire
Property & Development

12th March 2026

WARWICKSHIRE PROPERTY AND DEVELOPMENT GROUP LTD
Hawkes Point
1 Hawkes Drive
Heathcote Industrial Estate
Royal Leamington Spa
CV34 6LX

[redacted]

Dear Ian

Prologis Park Ryton West

We write in connection with Prologis' promotion of Prologis Park Ryton West through the Rugby Local Plan Review. As you are aware, Warwickshire Property and Development Group (WPDG) in partnership with Prologis and Warwickshire County Council (WCC) has committed to deliver small and medium sized employment units within use classes B2, B8 and E(g)(iii) at Prologis Park Ryton West.

This partnership is critically important to meeting the pressing needs of local businesses, addressing a shortage of high-quality small and medium-sized industrial space in the area, and supporting sustainable economic growth across Warwickshire

We write to set out how WPDG is very well placed to deliver the units and provide our unwavering support to the ongoing promotion of Prologis Park Ryton West.

About WPDG

Warwickshire Property and Development Group (WPDG) was launched by WCC in 2021 to deliver high quality new commercial space and new homes across Warwickshire. WPDG is making a real impact. One such example is Sucham Park, Southam. This development is now complete and fully let, It has successfully delivered 4,000 sq.m of industrial floorspace between 9 commercial units. The units range in size from 175 to 1,400 sq.m. This is similar to the scheme that would be delivered at Ryton West.

Support for Prologis Park Ryton West

As can be seen from Sucham Park and other schemes being progressed, WPDG is playing an increasing and important role in the delivery of smaller commercial units for SMEs in Warwickshire. WPDG is now seeking further sites with which it can deliver SME units.

WPDG identified Prologis Park Ryton West as an ideal site for starter and grow on units to complement the strategic employment offering made by Prologis, as well as Mountpark for the following reasons:

- The site is located next to an agglomeration of employment activities, including a stronghold in the automotive sector, which is a key industry for Warwickshire and the wider region.
- The site is easily accessible for the transportation of goods, with strong access to the corridors of the M45/M1, and A45/M6/M69.
- The site is ideally situated near to a very large labour pool. This labour pool will have the opportunity to travel to site via sustainable transport and active travel modes provided as part of the development.
- Prologis is offering a new training hub, which will be made available to the units delivered by WPDG.

WPDG is very disappointed that the site is no longer a draft allocation as per the Regulation 18 Preferred Options consultation. Notwithstanding this, WPDG would be able to provide 8,000 sq.m, of floorspace in small to medium sized units (ranging from 185 sq.m to 1,500 sq.m) to provide space for small and medium sized enterprises in accordance with the parameters set out for Ryton West by the Preferred Options consultation. This aligns very well with our track record (as noted above) across Warwickshire.

In light of the above considerations, we therefore continue to provide unwavering support for the promotion of your site through the Rugby Local Plan Review as it would align with our site requirements.

We trust that this confirms WPDG's continued commitment to Prologis Park Ryton West.

Yours sincerely,

[redacted]

[redacted]
Managing Director
Warwickshire Property & Development Group