

London Road, Ryton-on-Dunsmore

Regulation 19 Representation Transport Note

Client:	Tarmac Trading Limited	Job No	328854
Date:	11 March 2026	Approved by:	JW
Prepared by:	AF		

1. Introduction

- 1.1.1 This Regulation 19 Representation Transport Note (TN) has been prepared by mode transport planning (mode) on behalf of Tarmac Trading Limited to support representations to Rugby Borough Council's (RBC) Regulation 19 Pre-Submission Draft Local Plan Review in relation to land at London Road, Ryton-on-Dunsmore (Site 71).
- 1.1.2 The site seeks to deliver approximately 70,600 sqm (circa 760,000 sq ft) of industrial/employment floorspace under flexible Use Classes E(g)(iii), B2 and B8, with access achieved via a new roundabout on the A45 London Road.
- 1.1.3 For reference, the concept masterplan, which illustrates the location of the proposed roundabout access on A45 London Road, is shown in **Figure 1.1**.

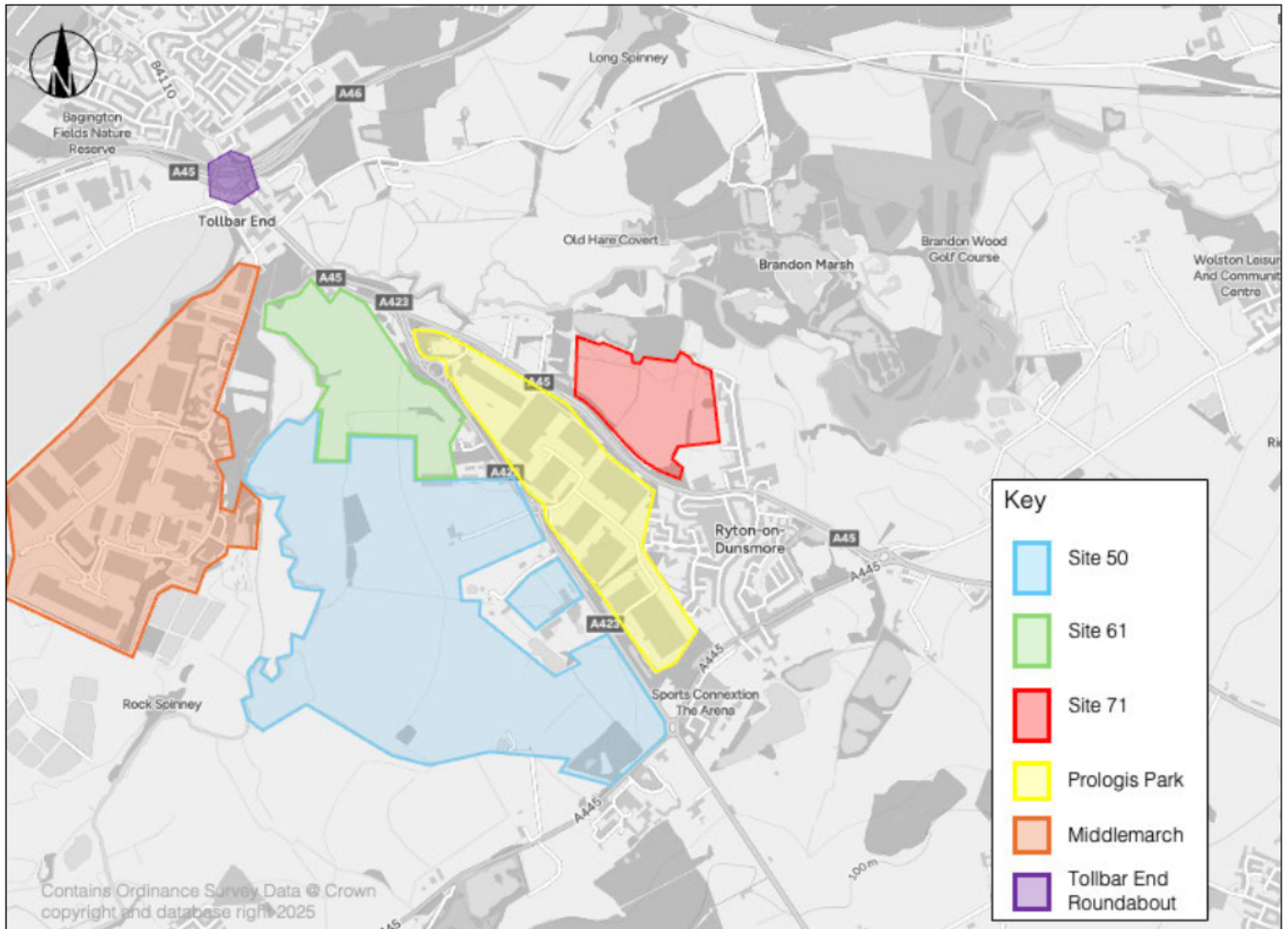
Figure 1.1 Proposed Concept Site Plan



1.1.4 This TN supplements a Transport Appraisal submitted in May 2025 (the 'May 2025 TA'). The TA included a comparative assessment between the land at London Road, Ryton-on-Dunsmore site (Site 71), the adjacent Prologis expansion site (Site 50), and Mountpark Ryton (Site 61), which together formed the Site 328 allocation.

1.1.5 The location of these sites in the context of Site 71 is shown in [Figure 1.2](#).

Figure 1.2 Site Context Plan



1.1.6 The May 2025 TA demonstrated that Site 71 was comparable to adjacent sites with regard to accessibility and was also noted to perform well with regard to traffic flow efficiency, with minimal impact of speeds and delay on the wider road network. As such, at the time of the TA, the transport evidence supports that Site 71 should be reconsidered for allocation within the RBC Local Plan.

1.1.7 Notwithstanding the above, since the May 2025 TA was prepared, the Prologis expansion (Site 328, i.e. Sites 50 and 61 combined) has been removed from the Local Plan, principally on highways grounds relating to traffic impacts at the A45/A46 Tollbar End Roundabout. However, other concerns were raised in relation to ecological and biodiversity impacts.

1.1.8 The removal of this site has two important implications for Site 71:

- First, the comparative basis of the May 2025 TA is no longer directly applicable (although the principle of development and accessibility remain appropriate), and this note therefore presents the transport case for Site 71 on its own merits; and

- Second, and critically, the removal of the Prologis scheme from the Local Plan significantly reduces the quantum of development traffic that would be generated in the area. Site 71 proposes approximately 70,600 sqm of floorspace, which is roughly one-fifth of the circa 350,000 sqm proposed under the Prologis expansion. The traffic impact of Site 71 at the Tollbar End Roundabout would therefore be materially lower than the impact that was considered unacceptable for the larger scheme.

1.1.9 On this basis, the removal of the Prologis site makes the proposed development site a significantly more attractive proposition for allocation, as the highway network, and the Tollbar Road Roundabout in particular, would be subject to materially lower levels of additional traffic than was previously anticipated with the allocation of the Prologis site.

1.1.10 The purpose of this note is to present the transport case for the allocation of Site 71, structured as follows:

- **Chapter 2** reviews the Regulation 19 transport evidence base and assesses the likely traffic impact of the proposed development, including the implications for the Tollbar End Roundabout and the application of the NPPF severity test;
- **Chapter 3** sets out the accessibility credentials of the site;
- **Chapter 4** details the principles of vehicular and sustainable transport access;
- **Chapter 5** reviews highway safety conditions and the benefits of the proposed access arrangements; and
- **Chapter 6** provides a summary and conclusions.

1.1.11 This note should be read in conjunction with the May 2025 TA, which provides the full policy context, site context plans, transport vision and concept masterplan.

2. Transport Evidence and Potential Traffic Impact

2.1 Overview

2.1.1 This chapter reviews the transport evidence supporting the Regulation 19 Local Plan, derives a high-level trip generation assessment of the proposed development based on the Prologis evidence base, and assesses the likely traffic impact on the Tollbar End Roundabout.

2.2 The Regulation 19 Evidence Base

2.2.1 A review of the transport evidence base supporting the Regulation 19 Local Plan has been undertaken. The evidence base does not include standalone modelling outputs of the Tollbar End Roundabout. There are no individual junction modelling results that quantify the existing capacity of the roundabout, its performance under baseline conditions, or its operation under various development scenarios.

2.2.2 Without standalone junction modelling, it is not possible to definitively determine what level of additional development traffic would be acceptable at the roundabout, nor to accurately quantify the specific impacts of individual sites on the junction's operation.

2.2.3 The strategic transport modelling used to inform the Regulation 19 Local Plan is derived from the Rugby Regional Assignment Model (RRAM). Strategic assignment models are primarily used to understand network-wide traffic patterns, link flows and overall congestion trends across a wide geographical area. Whilst appropriate for assessing strategic transport implications of Local Plan growth, such models do not replicate junction geometry or signal staging in detail.

2.2.4 Consequently, the outputs produced by the RRAM model provide information on:

- Link flows across the network;
- Changes in journey times; and
- Overall network queueing.

2.2.5 However, the model does not provide detailed operational modelling of individual junctions, such as:

- ARCADY modelling of roundabout capacity;
- LINSIG modelling of signalised junction operation; or
- microsimulation modelling (e.g. VISSIM) that would replicate lane geometry, signal phasing and driver behaviour.

2.2.6 As a result, the Regulation 19 evidence base does not include published outputs relating to:

- Queue lengths;
- Delays; or
- Degree of saturation / junction capacity utilisation.

2.2.7 This distinction is important when interpreting the outputs of the strategic modelling. Strategic models can identify where traffic growth may place pressure on the network; however, they are not typically relied upon to determine the detailed operational capacity of complex junctions. For large grade-separated interchanges such as the Tollbar End junction, which incorporates multiple lanes, signalised approaches and an underpass removing through traffic from the roundabout, detailed junction modelling would normally be required to establish the precise operational performance of the junction and the extent to which additional development traffic could be accommodated.

2.2.8 Notwithstanding this, the strategic transport modelling prepared by SLR in support of the evidence base provides total vehicle flow data at the Tollbar Road Roundabout across the modelled scenarios, as summarised in [Table 2.1](#).

Table 2.1 RRAM SRN Junctions Total Flows – A45/A46 Tollbar End (6 Hour Flows)

Junction	2018 Base Model	2042 Ref Case	% Ref Case vs Base	2042 LP + DS	% LP + DS vs Base	% LP + DS vs Ref Case
A45/A46 Tollbar End	56,717	67,851	+20%	72,320	+28%	+7%

2.2.9 As shown in [Table 2.1](#), between the 2018 Base Model and the 2042 Reference Case (which accounts for background traffic growth), total flows through the Tollbar Road Roundabout are forecast to increase by 20%. The addition of the Local Plan allocated development sites (LP + DS scenario) results in a further 7% increase over the Reference Case.

2.2.10 The 7% increase represents the additional traffic generated by the Local Plan allocated sites, over and above background growth (but does not include Site 328). This is the level of impact currently assumed within the evidence base. It is within this context that the impact of Site 71 should be assessed.

2.3 The 2021 Tollbar Road Roundabout Improvement Scheme

2.3.1 The Tollbar Road Roundabout was subject to a major improvement scheme, completed in 2021. The works included:

- Enlargement of the roundabout;
- Introduction of a new underpass connecting the A45 Stonebridge Highway and A46 Coventry Eastern Bypass, removing a significant proportion of through-traffic from the at-grade roundabout;
- Addition of an extra lane in each direction between Stivichall and Tollbar junctions (approximately 3km); and

- Provision of a new shared pedestrian/cycleway.

2.3.2 A post-opening evaluation report prepared by National Highways in December 2023 confirmed that the improvement scheme has reduced the overall volume of traffic using the at-grade junction, provided additional capacity, and improved journey times via the new underpass.

2.3.3 The junction now benefits from significantly greater capacity than it did prior to the 2021 works. This is a relevant material consideration when assessing the impact of any additional development traffic.

2.4 Trip Generation

2.4.1 In order to derive a robust estimate of the trip generating potential of the proposed development, the trip generation assumed for the Prologis expansion (Site 328, circa 350,000 sqm) within the Regulation 19 evidence base has been reviewed. The Prologis light vehicle trip generation across the modelled peak hours is set out in [Table 2.2](#).

Table 2.2 Site 328 – Light Vehicle Trip Generation

	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures	Two Way Total
AM Peak Hour	0700 – 0800		0800 – 0900		0900 – 1000		0700 - 1000
AM Trip Generation	871	240	1,027	381	647	509	3,675
PM Peak Hour	1600 – 1700		1700 – 1800		1800 – 1900		1600 - 1900
PM Trip Generation	482	951	332	805	242	409	3,221

2.4.2 As shown in [Table 2.2](#), the Prologis expansion (circa 350,000 sqm) is estimated to generate 3,675 two-way light vehicle movements across the three AM peak hours and 3,221 across the three PM peak hours, totalling 6,896 two-way movements across the six modelled hours. In the standard peak hours, this equates to 1,408 two-way movements in the AM peak (0800–0900) and 1,137 in the PM peak (1700–1800).

2.4.3 Site 71 proposes approximately 70,600 sqm of floorspace, approximately one-fifth of the Prologis quantum. On a proportional basis, dividing the Prologis trip generation by five provides a reasonable estimate of the trip generating potential of the proposed development. The resulting trip generation is set out in [Table 2.3](#).

Table 2.3 Proposed Development Estimated Light Vehicle Trip Generation (One-Fifth of Site 328)

Time Period	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures	Two Way Total
AM Peak Hour	0700 – 0800		0800 – 0900		0900 – 1000		0700 - 1000
AM Trip Generation	174	48	205	76	129	102	735
PM Peak Hour	1600 – 1700		1700 – 1800		1800 – 1900		1600 - 1900
PM Trip Generation	96	190	66	161	48	82	644

2.4.4 As shown in [Table 2.3](#), the proposed development is estimated to generate approximately 735 two-way light vehicle movements across the three AM peak hours and 644 across the three PM peak hours, totalling approximately 1,379 two-way movements across the six modelled hours. In the standard peak hours, this equates to approximately 281 two-way movements in the AM peak (0800–0900) and 227 in the PM peak (1700–1800).

2.4.5 It should be noted that these estimates are derived proportionally from the Prologis trip generation and represent a high-level, robust assessment. The actual trip generation could be lower, subject to the ultimate mix of use classes and the application of site-specific trip rates derived from a TRICS assessment. These trip rates would need to incorporate HGV movements and be agreed with WCC and NH at the planning application stage.

2.4.6 Notwithstanding the above, it is evident that Site 71 would stand to generate significantly less vehicle movements, for example:

- 0800–0900 AM Peak: approximately 281 two-way movements, compared with 1,408 two-way movements for the Prologis scheme; and
- 1700–1800 PM Peak: approximately 227 two-way movements, compared with 1,137 two-way movements for the Prologis scheme.

2.4.7 This represents a reduction of approximately 80% in peak hour traffic generation compared to the previously promoted scheme. The scale of traffic impact associated with Site 71 is therefore materially different to that considered for the Prologis expansion within the Regulation 19 evidence base.

Trip Distribution

2.4.8 As presented in the May 2025 TA, analysis of 2011 Census Journey to Work data (Nomis, MSOA level, Rugby 004 as place of work) indicates that commuting traffic would be distributed broadly evenly on the A45, with approximately 47% routing north-west towards Coventry via the Tollbar Road Roundabout and 53% routing south-east towards Rugby and Northampton.

2.5 Impact at the Tollbar End Roundabout

2.5.1 Applying the initial 53/47 distribution to the estimated trip generation, 47% of the site’s traffic would route through the Tollbar End Roundabout. This equates to approximately 648 two-way light vehicle movements across the six modelled hours (1,379 * 0.47). It should also be noted that if distribution were to change, this still would not materially change the level of traffic routing through the Tollbar End Roundabout and would still be significantly less than that assumed for Site 328.

2.5.2 The 2042 Reference Case total flow through the Tollbar Road Roundabout is 67,851 vehicles across six hours. The addition of 648 vehicles from the proposed development would represent an increase of approximately 1.0% over the Reference Case flows.

Table 2.4 Site 71 – Estimated Impact at Tollbar Road Roundabout

Parameter	Value
2042 Reference Case – Tollbar End (6hr total flows)	67,851
Local Plan allocated sites increase (LP+DS vs Ref Case)	+7% (+4,469 vehicles)
Proposed development estimated 6hr total trip generation	1,379
Proposed development trips through Tollbar End Roundabout (47%)	648
Proposed development as % increase of 2042 Reference Case flows	c.0.95%

2.5.3 As demonstrated in **Table 2.4**, the traffic from development traffic passing through the Tollbar Road Roundabout would equate to an approximate increase of 0.95% of the 2042 Reference Case flows. This is a modest and proportionate level of additional traffic, and within daily fluctuations in network traffic, particularly when compared to the 7% increase already assumed for the Local Plan-allocated sites.

- 2.5.4 The Prologis expansion (circa 350,000 sqm) was considered to generate an unacceptable level of traffic at the Tollbar Road Roundabout, leading to its removal from the Local Plan. The proposed development, at one-fifth of the Prologis floorspace, would generate approximately one-fifth of that traffic, a fundamentally different scale of impact.
- 2.5.5 The additional 0.95% increase from the proposed development would not be expected to materially increase congestion or delay at the junction, particularly in the context of the capacity improvements delivered through the 2021 improvement scheme.
- 2.5.6 It is also important to recognise that the Tollbar End junction operates as a major strategic interchange connecting the A45 and A46 corridors and serving movements to and from Coventry and the wider strategic highway network. The busiest movements at the junction are typically associated with strategic through traffic on the A45 corridor and movements between the A45 and A46. In comparison, the additional traffic associated with Site 71 would represent a very small proportion of overall junction flows and would be distributed across multiple arms of the junction rather than concentrated on a single approach. As such, the modest increase in traffic associated with the proposed development would not be expected to materially alter the operational characteristics of the junction.

2.6 The NPPF Severity Test

- 2.6.1 The Government published a draft revised NPPF for consultation in December 2025, which introduces a restructured approach to transport policy. Whilst the draft NPPF has not yet been adopted, it is a material consideration and provides an indication of the direction of national policy.
- 2.6.2 Draft Policy TR6(3) states that all development proposals should be capable of proceeding without having a severe adverse impact on the transport network, in terms of capacity and congestion including cumulative impacts, or an unacceptable impact on highway safety, taking into account any mitigation measures proposed as well as any wider network improvements. Draft Policy TR6(4) requires that all reasonable future scenarios should be considered, including potential cumulative impacts and the promotion of sustainable modes of travel.
- 2.6.3 An additional increase of approximately 0.95% of traffic at the Tollbar End Roundabout, directed to a junction that has been subject to major capacity improvements in 2021, would not be expected to result in a severe adverse impact on the transport network. The threshold for preventing development on highways grounds under the severity test, whether assessed against adopted Paragraph 116 or draft Policy TR6(3), is therefore unlikely to be met.

- 2.6.4 The draft NPPF also places greater emphasis on a vision-led approach to transport, with draft Policy TR6(2) requiring that transport assessments reflect the transport vision for the development and how it is intended to be achieved. The proposed development would be supported by a transport strategy aligned with a vision in line with this policy. This will prioritise sustainable travel for employees through active travel infrastructure, travel planning measures and public transport integration. Freight movements would be managed through operational measures including a Delivery and Servicing Management Plan (DSMP), seeking to minimise reliance on private car travel where practicable.
- 2.6.5 Furthermore, without standalone modelling of the Tollbar End Roundabout, there is insufficient evidence within the current Regulation 19 evidence base to suggest a severe impact at the Tollbar End Roundabout.

2.7 Summary

- 2.7.1 The Regulation 19 evidence base does not include standalone modelling of the Tollbar Road Roundabout. However, the available strategic model data shows that the Local Plan allocated sites increase traffic through the junction by 7% over the Reference Case.
- 2.7.2 The proposed development, at one-fifth of the Prologis floorspace, would add approximately 648 vehicles through the Tollbar End Roundabout across the six modelled hours, which is an increase of approximately 0.95% over the Reference Case.
- 2.7.3 This is considered to be a modest and proportionate level of traffic that would not be expected to result in a severe impact under the NPPF test (both adopted and emerging), particularly in the context of the 2021 improvement works. However, further assessment would be required to understand likely impacts as a result of the proposals.

3. Accessibility

3.1 Overview

- 3.1.1 This chapter sets out the accessibility credentials of the site. As noted in [Chapter 1](#), the accessibility of the area was not a reason for the removal of the Prologis expansion from the Local Plan, and the accessibility of the site is not considered to be an impediment for allocation, particularly in the context of Site's 328 previous allocation and removal not related to accessibility.

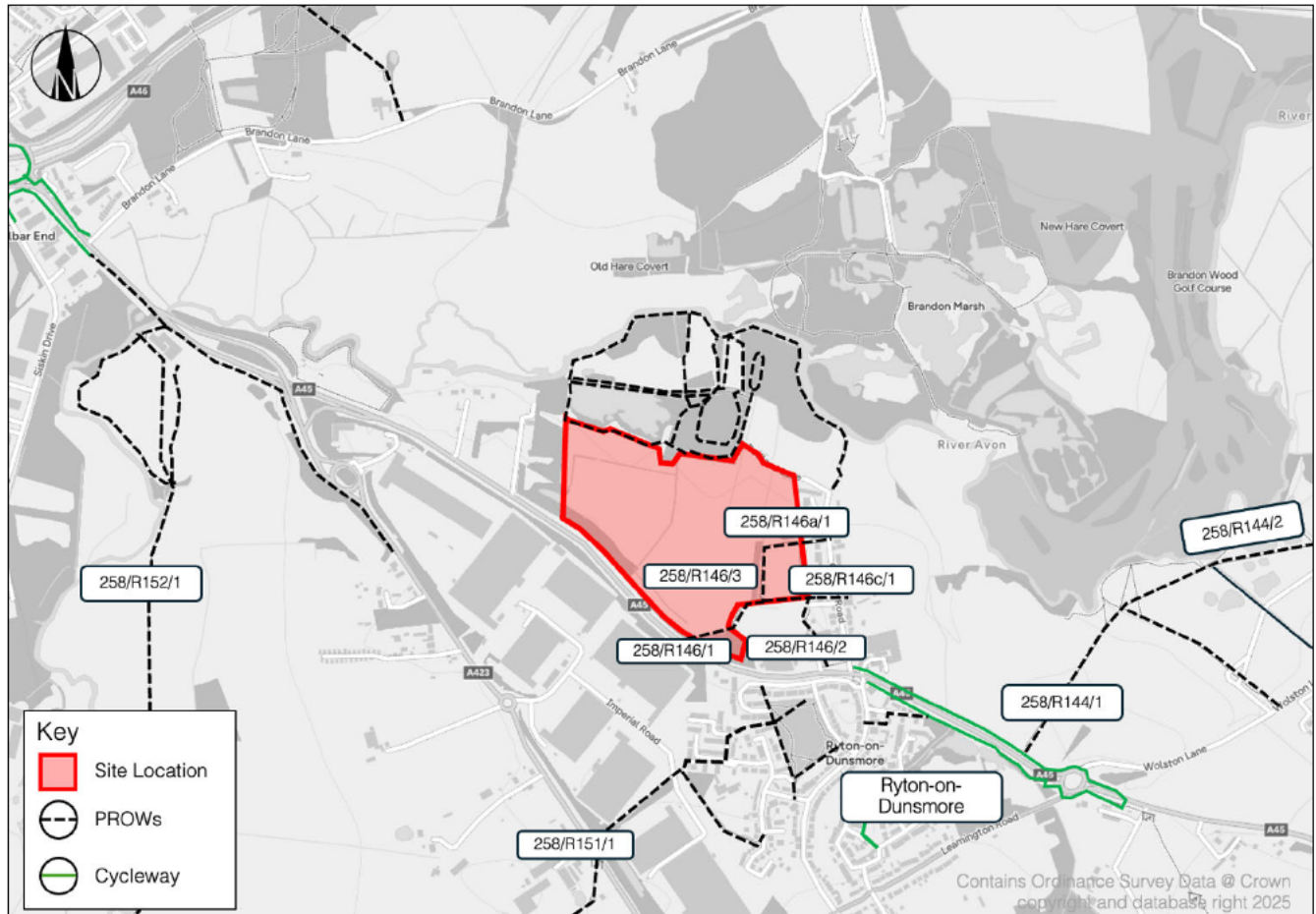
3.2 Strategic Highway Connectivity

- 3.2.1 The site is strategically positioned adjacent to the A45 London Road, a primary east-west arterial route forming part of the Strategic Road Network. The A45 provides direct connectivity to Coventry (approximately 6km north-west) and Rugby (approximately 12km east), with links to the M45, M1 and M6 motorways, facilitating regional and national freight and commuter movements.
- 3.2.2 The site's location on the A45 corridor is a significant asset for an industrial/employment development, providing efficient access for both HGV movements.

3.3 Walking and Cycling

- 3.3.1 There are a number of Public Rights of Way (PRoWs) in the vicinity of the site, providing connections into the villages of Ryton-on-Dunsmore and Bubbenhall. Footways are provided on both sides of the A45 in the vicinity of the site, and a pedestrian underpass adjacent to Church Road facilitates crossing of the A45.
- 3.3.2 A shared pedestrian/cycleway is provided on both sides of the A45 between Church Road and the Ryton Roundabout. The roads within Ryton-on-Dunsmore village are subject to a 20mph speed limit and are conducive to cycling. The pedestrian and cycle network within the vicinity of the site can be found in [Figure 3.1](#).

Figure 3.1 Pedestrian and Cycle Network



3.3.3 Local amenities within Ryton-on-Dunsmore, including a Co-operative supermarket, recreation grounds, a village hall, eateries and public houses, are within reasonable walking distance of the site.

3.4 Public Transport

3.4.1 Bus service 25 operates between Coventry and Rugby, with stops located approximately 500m (a 7-minute walk) to the east of the site. A summary of the local bus service is provided in **Table 3.1**.

Table 3.1 Bus Network

Bus No.	Route	Approximate Weekday Frequency	Approximate Weekend Frequency	
			Saturday	Sunday
25	Coventry – Rugby (via Baginton, Ryton & Bourton)	07:20, 10:15, 12:20, 14:50, 17:07 and 18:25	07:20, 10:15, 12:20, 14:50, 17:07 and 18:25	-

3.4.2 Coventry Railway Station is accessible by bus and is located approximately 6.6km to the north-west, providing frequent services to London Euston, Birmingham New Street and other regional destinations. A summary of rail services from Coventry Rail Station is provided in **Table 3.2**.

Table 3.2 Summary of Rail Services

Destination	Peak Hour Frequency		Weekend Frequency		Approximate Journey Times
	AM	PM	Saturday	Sunday	
London Euston	5 per hour	5 per hour	5 per hour	3 per hour	1h 10m
Birmingham New Street	4 per hour	4 per hour	4 per hour	3 per hour	30m
Bournemouth	1 per hour	1 per hour	1 per hour	1 per hour	2h 49m

3.5 Established Employment Area

3.5.1 The site is located within an area characterised by existing commercial and industrial activity, including Prologis Park Ryton to the south, Middlemarch Business Park to the south-west, Whitley Business Park and the Airport Retail Park to the north-west, and the West Midlands Gigafactory. The presence of established employment clusters in the immediate vicinity provides a strong indication that the area is inherently suited to industrial/employment development.

3.6 Summary

3.6.1 The site benefits from strong strategic highway connectivity and is located within an established employment area with consented and operational industrial/logistics uses. The accessibility of the area was not a reason for the removal of the Prologis expansion from the Local Plan and is not considered to be an impediment to the promotion of the proposed development.

4. Principles of Access

4.1 Vehicular Access

4.1.1 The primary vehicular access is proposed via a new roundabout junction from the A45 London Road on the southern boundary.

4.1.2 The roundabout would be designed in accordance with the Design Manual for Roads and Bridges (DMRB) and subject to detailed design discussions with WCC and NH. The exact geometries of the roundabout would be informed by a junction capacity modelling assessment. The design would accommodate a 16.5m articulated lorry, demonstrated through swept path analysis.

4.1.3 It is noted that the previously promoted Prologis expansion proposals also envisaged new access arrangements from the A45 corridor to serve the development. The principle of providing a new junction onto the A45 to accommodate employment development in this location has therefore previously been accepted within the Local Plan evidence base. The proposed roundabout access for Site 71 represents a similar strategic approach, providing a safe and efficient connection to the Strategic Road Network whilst maintaining the function of the A45 as a key east–west corridor.

4.2 Walking and Cycling Provision

4.2.1 The proposed roundabout would deliver improved pedestrian and cycle connectivity, including a connection across the A45 as an alternative to the existing Church Road underpass. Connections to the east via Church Road would improve permeability to Ryton-on-Dunsmore and the existing PRoW network. Infrastructure would be designed in accordance with LTN 1/20.

4.2.2 Further opportunities to enhance sustainable connectivity could be explored as part of a future planning application. This could include improvements to the wider active travel network, including potential enhancements to the shared pedestrian and cycle routes along the A45 corridor and improved connections towards the Tollbar End interchange and Coventry. Such measures would support wider policy objectives relating to active travel and sustainable transport.

4.3 Transport Vision

4.3.1 The transport vision for the proposed development is to create a well-connected, sustainable development prioritising non-car modes for employees whilst enabling efficient goods movement, underpinned by:

- Encouraging non-car travel through Travel Plans, active travel infrastructure and supporting facilities;
- Integrating with public transport through enhanced/bespoke services; and
- Managing HGV movements through time-based delivery management and a DSMP.

4.3.2 Parking provision within the development would be designed in accordance with WCC's adopted parking standards. A combination of staff and visitor car parking, accessible bays and HGV service yards would be provided, with each unit benefiting from dedicated servicing areas separated from car parking and pedestrian routes for safety and operational efficiency.

4.3.3 Cycle parking, electric vehicle charging infrastructure and disabled parking would also be provided in line with adopted standards. The quantum of parking would be determined at the planning application stage, having regard to the operational requirements of the proposed uses whilst also supporting the policy objective of encouraging travel by sustainable modes.

4.4 Summary

4.4.1 The development would be accessed via a new roundabout junction on the A45 London Road, designed in accordance with DMRB and informed by junction capacity modelling. The scheme would also improve walking and cycling connectivity, including a new crossing of the A45 and enhanced links to Ryton-on-Dunsmore and the surrounding PRow network in line with LTN 1/20.

4.4.2 The overall transport strategy seeks to prioritise sustainable travel for employees while supporting efficient movement through active travel provision, public transport integration and HGV management measures.

5. Highway Safety Review

5.1 Overview

5.1.1 This chapter reviews the existing highway safety conditions on the A45 London Road corridor in the vicinity of the site, drawing on collision data for the latest available period between 2019 - 2024.

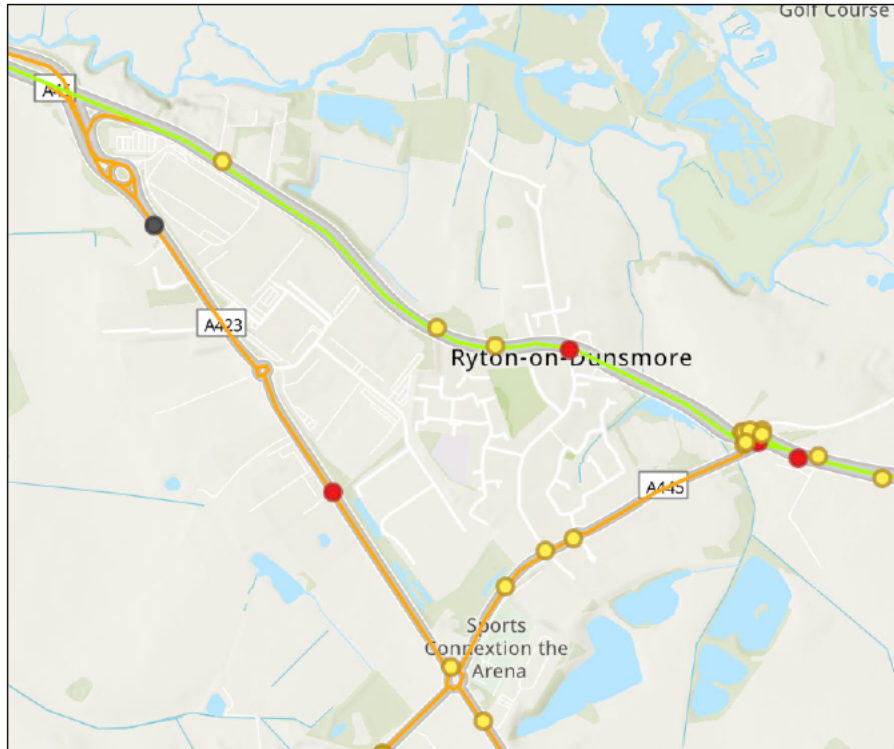
5.1.2 It also sets out the potential highway safety benefits that would be delivered through the proposed access arrangements, including the opportunity to remove the existing right-turn movement at Church Road.

5.2 Existing Conditions

5.2.1 The A45 London Road in the vicinity of the site is a dual carriageway subject to a 50 mph speed limit, carrying a mix of strategic, local and HGV traffic associated with the established employment and logistics uses in the area.

5.2.2 A review of collision data from the CrashMap database has been undertaken for the A45 corridor in the vicinity of the site, covering the most recent five-year period (2019–2024). The collision record is summarised below and illustrated in [Figure 5.1](#).

Figure 5.1 Collision Record 2019 - 2024



5.2.3 Within the study area, the following collisions have been recorded during the 2019–2024 period:

- One fatal collision (on the A423);
- Several serious collisions (denoted in red), including incidents on the A45 corridor to the east of the site in the vicinity of the Ryton Roundabout and on the A45 adjacent to the village; and
- A number of slight collisions (denoted in yellow) distributed along the A45 corridor and at key junction locations.

5.2.4 The collision record indicates that there have been a number of incidents recorded along the A45 corridor over the five-year study period. Given the strategic nature of the route and the high volumes of traffic it carries, the level of recorded collisions is not considered to be disproportionate to what would be expected on a road of this nature and function.

5.2.5 Whilst the collision record does not identify a specific cluster at the Church Road right-turn junction, the manoeuvre itself is recognised as a potential highway safety concern. The junction requires vehicles travelling from the south-east to undertake an uncontrolled right-turn across the westbound carriageway of the A45, crossing two lanes of high-speed opposing traffic. This type of manoeuvre on a 50mph dual carriageway is widely acknowledged to present a significant safety risk, regardless of the recorded collision history at that specific location.

5.2.6 A pedestrian underpass adjacent to Church Road provides a route for pedestrians crossing the A45. However, the at-grade vehicular junction remains a point of concern for residents and road users accessing Ryton-on-Dunsmore.

5.3 Potential Highway Safety Benefits of the Proposed Access

5.3.1 The proposed new roundabout junction on the A45 would be located to the west of the Church Road junction. Its introduction would deliver a number of potential highway safety benefits, which are set out below.

Speed Reduction

5.3.2 The roundabout would introduce a physical speed reduction feature on the A45 dual carriageway in the vicinity of Ryton-on-Dunsmore. Approaching vehicles from both directions would be required to reduce speed to navigate the roundabout, resulting in a meaningful reduction in prevailing speeds in the immediate vicinity of the village. This would change the character of the road environment and likely improve safety for all road users, including pedestrians and cyclists.

Removal of the Church Road Right-Turn Movement

5.3.3 The proposed roundabout would provide a controlled turning facility on the A45 in close proximity to Church Road. Vehicles wishing to access Church Road from the south-east would instead continue to the new roundabout, undertake a U-turn, and approach Church Road as a left-turn movement from the eastbound carriageway.

5.3.4 The provision of this facility would create the opportunity for the existing right-turn movement at Church Road to be removed. This could be achieved through the extension of the physical central reservation, preventing vehicles from crossing the opposing carriageway.

5.3.5 The removal of the right-turn movement would eliminate the conflict between turning vehicles and high-speed through-traffic at this location. Even in the absence of a recorded collision cluster at the junction, the removal of an uncontrolled right-turn across a dual carriageway represents a potential improvement to highway safety.

5.4 Consistency with WCC Road Safety Objectives

5.4.1 Warwickshire County Council's LTP4 (June 2023) Policy Position ST2 sets out evidence-led road safety interventions, including casualty reduction schemes, traffic calming initiatives and speed management measures. The introduction of a roundabout on the A45 at this location, combined with the potential removal of the Church Road right-turn, is consistent with these objectives and would deliver a measurable improvement in road safety on the A45 corridor.

5.5 Further Collision Assessment

- 5.5.1 It should be noted that the collision data reviewed above has been sourced from the CrashMap database, which provides publicly available records. Whilst this provides a useful indication of the collision record on the A45 corridor, a more detailed assessment would be undertaken as part of any future assessment for the site.
- 5.5.2 This would include the procurement of up-to-date collision data directly from Warwickshire Police, covering the most recent five-year period at the time of application. The data would provide a more comprehensive dataset, including detailed records of collision causation factors, vehicle manoeuvres, road conditions and contributory factors, which would enable a thorough analysis of collision patterns and any relationship between recorded incidents and the existing highway environment.

5.6 Summary

- 5.6.1 The collision record for the A45 corridor (2019–2024) demonstrates collisions occurring the vicinity of the site, including one fatal and several serious incidents. The proposed roundabout access would deliver material highway safety improvements: speed reduction on the A45 in the vicinity of Ryton-on-Dunsmore, and the opportunity to remove the existing uncontrolled right-turn movement at Church Road. These benefits are consistent with WCC's road safety policy and represent a positive contribution to the development of the site to the local highway network.

6. Summary and Conclusion

- 6.1.1 This Regulation 19 Representation Transport Note has been prepared by mode transport planning on behalf of Tarmac Trading Limited to support the representation for the allocation of land at London Road, Ryton-on-Dunsmore (Site 71) within the emerging Rugby Borough Local Plan.
- 6.1.2 Since the May 2025 Transport Appraisal was prepared, the adjacent Prologis expansion has been removed from the Local Plan on highways grounds, principally due to traffic impacts at the A45/A46 Tollbar End Roundabout. This is a material change in circumstances that significantly improves the transport case for potential development of Site 71.
- 6.1.3 The proposed development comprises approximately 70,600 sqm of floorspace, equivalent to roughly one-fifth of the Prologis quantum. Applying the Prologis trip generation on a proportional basis, the development would generate approximately 1,379 two-way light vehicle movements across the six modelled hours, compared to 6,896 for the Prologis scheme.

- 6.1.4 With 47% of trips distributed north-west via the Tollbar End Roundabout, the proposed development would add approximately 648 vehicles across the six modelled hours, an increase of approximately 0.95% over the 2042 Reference Case flows. This compares to the 7% increase already assumed from the Local Plan allocated sites.
- 6.1.5 The Tollbar End Roundabout was subject to major improvement works completed in 2021, including a new underpass removing through-traffic from the at-grade roundabout and additional lanes on the A45. The junction benefits from significantly greater capacity than was previously available, as confirmed by National Highways' post-opening evaluation (December 2023).
- 6.1.6 The Regulation 19 evidence base does not include standalone modelling of the Tollbar End Roundabout. Without this evidence, it is not possible for the Council to definitively demonstrate that the additional traffic from the proposed development would result in a severe impact. Standalone junction modelling should be undertaken at the appropriate stage to provide a definitive assessment.
- 6.1.7 An additional increase of approximately 0.95% of traffic at a junction that has been subject to major capacity improvements would not be expected to result in a severe residual cumulative impact under either Paragraph 116 of the adopted NPPF, or policy TR6 (3) of the December 2025 draft NPPF. The threshold for refusing development on highways grounds is therefore unlikely to be met.
- 6.1.8 The accessibility of the area was not a reason for the removal of the Prologis expansion. The site benefits from strong Strategic Road Network connectivity, existing walking and cycling infrastructure, public transport provision via bus service 25, and is located within an established employment area with consented and operational industrial/logistics uses. These factors reinforce the suitability of the location for employment development.
- 6.1.9 Safe and suitable vehicular access can be achieved via a new roundabout on the A45, designed in accordance with DMRB and informed by junction capacity modelling. Walking and cycling connectivity would be enhanced in accordance with LTN 1/20, with improved links to Ryton-on-Dunsmore and the surrounding PRow network.
- 6.1.10 The collision record for the A45 corridor (2019–2024) demonstrates collisions have occurred in proximity to the site, including one fatal and several serious incidents. The proposed roundabout would reduce prevailing speeds on the A45 in the vicinity of Ryton-on-Dunsmore and create the opportunity to remove the existing uncontrolled right-turn movement at Church Road by providing a U-turn facility. These benefits are consistent with WCC LTP4 Policy Position ST2.
- 6.1.11 On the basis of the above, it is considered that the proposed development could be suitable from a highways and transport perspective for allocation within the emerging Rugby Borough Local Plan.

6.1.12 The removal of the Prologis expansion makes the site a significantly more attractive proposition, as the Tollbar End Roundabout and A45 corridor would be subject to materially lower levels of additional traffic than previously proposed. The proposed development offers the opportunity to deliver meaningful highway safety improvements and can be served by appropriate vehicular and sustainable transport access.

6.1.13 Tarmac Trading Limited remains committed to working collaboratively with Rugby Borough Council, Warwickshire County Council and National Highways to ensure that the transport impacts of the proposed development are appropriately assessed and mitigated through any allocation and planning application process.

TARMAC SITE

BRANDON, RUGBY

VISION DOCUMENT
OCTOBER 2024



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Date: 22.10.2024 / Status: Final / Rev: B
Author: BR / SZ / Checked by: PV



THE VISION



Economic Driver

The development will provide 760,000 sqft of B1/B2/B8 and class E Commercial use floorspace helping to meet national demand for Industrial and Logistics Property.



Deliverable

The Site is available immediately with minimal constraints and requiring minor infrastructure improvements.



Connectivity + Accessibility

Easy access to national motorway network, traversing north/south and east/west.

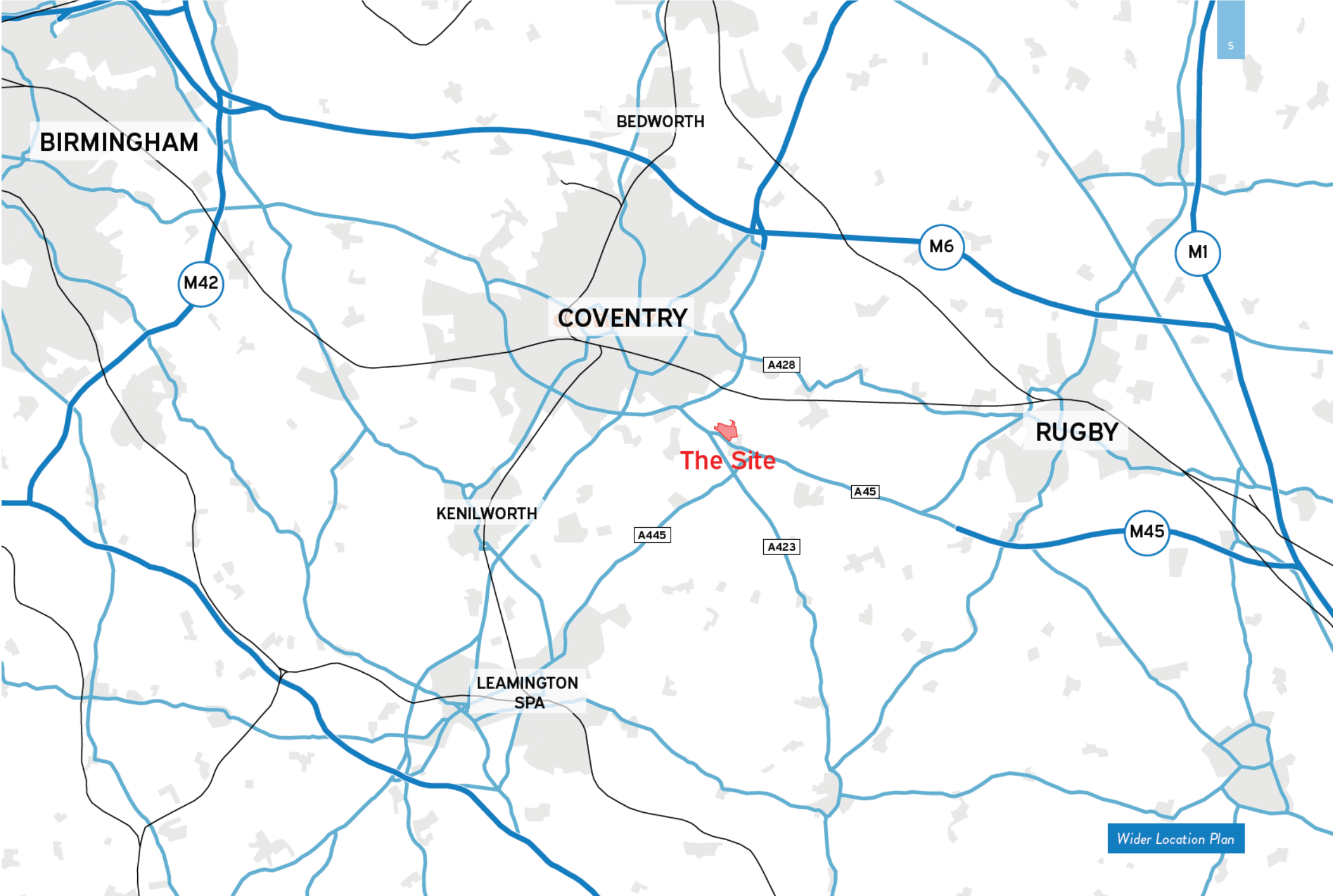
INTRODUCTION

This Vision Document has been prepared by Stantec on behalf of Tarmac, who are promoting the Site at Land off London Road, Ryton-on-Dunsmore.

The purpose of this document is to support the promotion of the Site to accommodate industrial/commercial development/highway improvements and associated public open space. The key aims and objectives of the document are to:

- Present a Vision and Design Framework which has guided and shaped the proposals.
- Review the Site in the context of current Planning Policy.
- Present an understanding of the Site, the local context and collate key opportunities and constraints affecting the Site, as well as design proposals with regard to each key discipline.
- Present the emerging Concept Masterplan, supported by an explanation of the key design principles that have informed it.





BIRMINGHAM

BEDWORTH

COVENTRY

RUGBY

KENILWORTH

LEAMINGTON
SPA

The Site

M42

M6

M1

A428

A45

A445

A423

M45

LOCAL CONTEXT

The Site lies approximately 6 km south-east of Coventry city centre and 12 km to the west of Rugby, adjacent to Ryton-on-Dunsmore.

Accessed directly off the A45, the site is located within 15 mins drive of junctions to both the M6 and M1.

Facilities and Services

There are a number of facilities located within walking distance of the site, in Ryton-on-Dunsmore there are 2 schools, a pub and a supermarket. The schemes proximity to Coventry also affords access to hospitals, larger scale retail parks and the amenities of a city centre.

There are a number of schools in the local area with the closest primary school being Provost Williams Church of England.

Recreational and community facilities are available at the sports connexion facility.

The site lies in close proximity to the Brandon Nature Reserve and Ryton Pools Country Park, offering opportunity for health and recreation benefits locally.

Transport

Bus

There are a number of bus stops within less than 1km of the site within Ryton-on-Dunsmore, with the no 25 service stopping on Leamington Road and London Road, as well as bus stops on Oxford Road offering onward travel to Rugby from Coventry.

Walking/Cycling

The Site is located within close proximity of a number of Public Rights of Way, with the opportunity to create new cycle and pedestrian routes within the site linking, to the surrounding countryside and local centres. There are no designated cycleways or active travel routes connecting the Site to the local centres or train station.

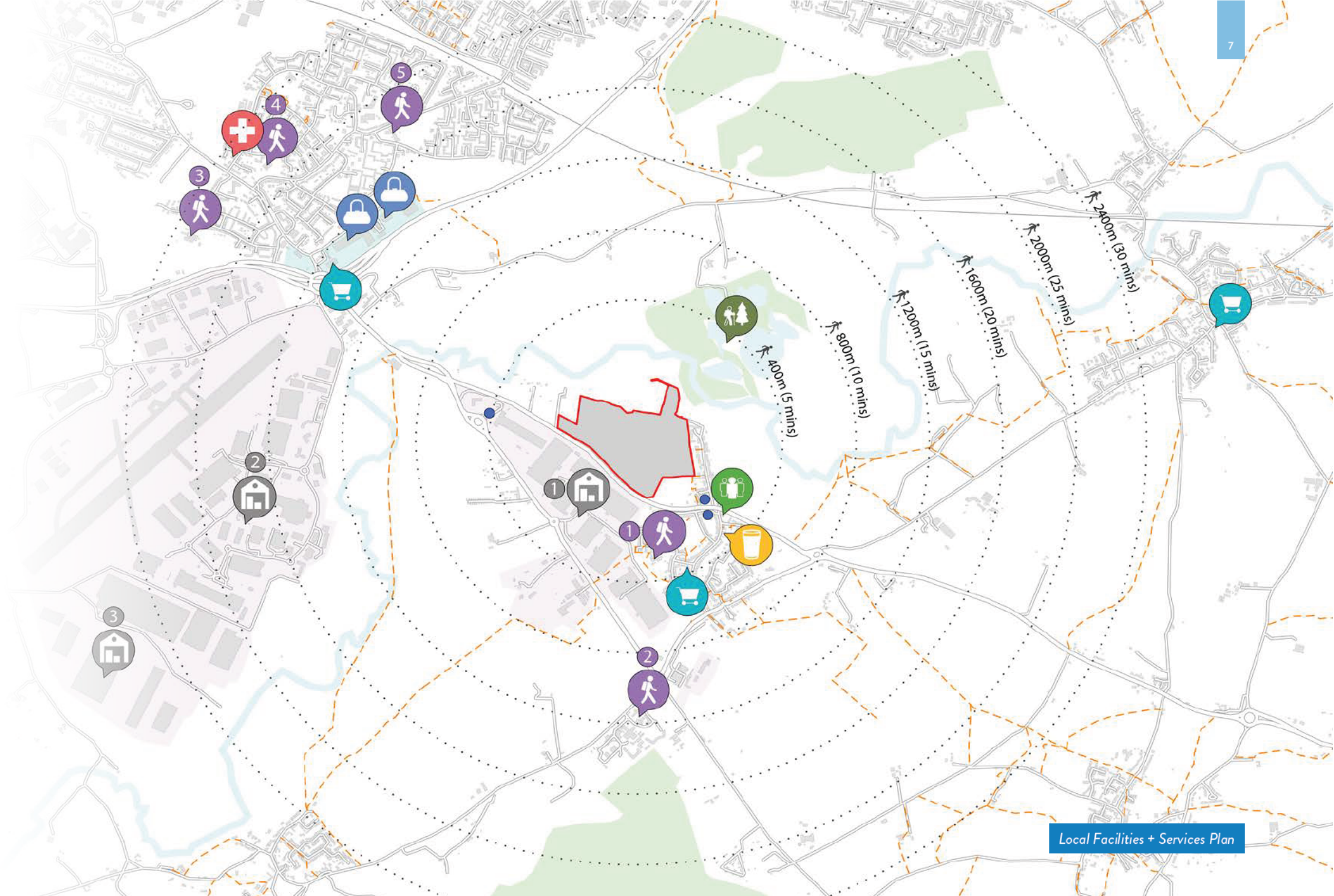
Car

The site is located adjacent to A45/London Road, a main A Road connecting Coventry and Rugby. It is well located for key road connections to the M6/M1 and M40.

Train

Coventry train station is located approximately 6km to the north west and accessible by various modes of transport.

-  Site Boundary
-  Public Rights of Way
-  400m Walking Distances (From Centre of Site)
-  Ryton on Dunsmore Village Hall
-  Schools
 1. Provost Williams Church of England School
 2. College of Policing
 3. Bagington Fields School
 4. Stretton Church of England Academy, Coventry
 5. Willenhall Community Primary School
-  Medical Centres + Pharmacies
-  Supermarkets + Local Shops
-  Pubs
-  Industrial Parks
 1. Prologis Park Ryton
 2. Segro Park
 3. Imperial Park / Middlemarch Business Park
-  Brandon Marsh Nature Reseve
-  Nearby Bus Stops



TRAVEL TIME

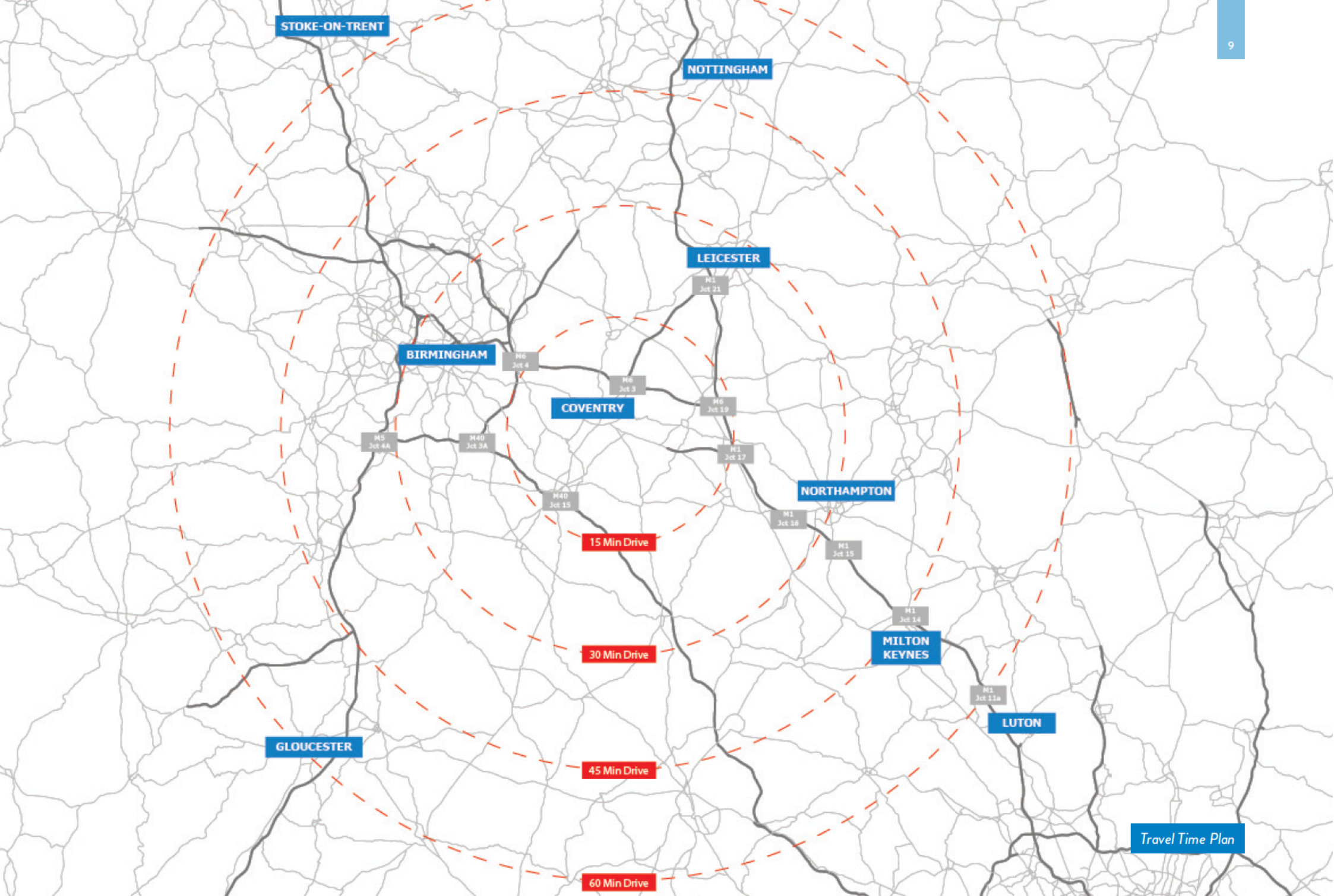
The site is well connected by national infrastructure being in close proximity to both the M6 and M1 motorways, that traverse North/South and East/West. A-roads also provide wider connections to the M5 and M40 beyond.

Within 15 minutes travel time, the site is accessible to junctions 1/2/3 of the M6, junction 18 of the M1 and junction 15 of the M40.

Within 2 hour travel time, the site is accessible to the M5, M50 and M54.

The map opposite shows proximity to major highway junctions with wider travel times highlighted on page 9.





STOKE-ON-TRENT

NOTTINGHAM

LEICESTER

BIRMINGHAM

COVENTRY

NORTHAMPTON

MILTON KEYNES

LUTON

GLOUCESTER

15 Min Drive

30 Min Drive

45 Min Drive

60 Min Drive

Travel Time Plan

OPPORTUNITIES AND CONSTRAINTS

The Opportunities and Constraints Plans opposite demonstrates a number of key Opportunities and Constraints located on the Site and in the surrounding area.

Opportunities

- The Site is in close proximity to existing commercial uses and as such can benefit from the existing highway Infrastructure and capacity.
- The Site is well screened to the north by Steetley Meadows and there are dense hedgerows to the screen development from the A45 to the south.
- The Site has little topographical variance with negligible impact on long distance views.
- There are public rights of way crossing the land with the eastern confines of the Site, connecting Church Road to the footpaths running adjacent to the A45.
- The A45 to the south is a busy A road and as such is a noise generator.
- The Site sits at a lower level from the A45.

Constraints

- The Site borders the conservation area Steetley Meadows, although the designation is confined to the woods and the nature reserve beyond.
- The River Avon lies to the north of the Site and has an associated flood zone highlighted on the constraints plan.





CONCEPT MASTERPLAN

The Concept Masterplan for the Site is presented opposite. The plan has been prepared in response to the Opportunities and Constraints detailed in the previous section. A summary of the key design principles of the Site are listed below:

- The concept masterplan shows 4 larger scale units at approximately 172,500 sqft of B1/B2/B8 and class E use.
- 3 smaller scales units at approximately 23,000 sqft.
- Total development of approximately 760,000 sqft of development.
- Improved connections to Brandon Nature reserve to the north.
- Introduction of a roundabout to the A45, incorporating highway works to reduce traffic speeds adjacent to the site, slowing traffic before it reaches the centre of Ryton-on-Dunsmore.
- Clear circulation routes for vehicles and pedestrians.
- Buildings delivered at a scale which responds well to the neighbouring context.
- Delivery of a new park and open space for residents.





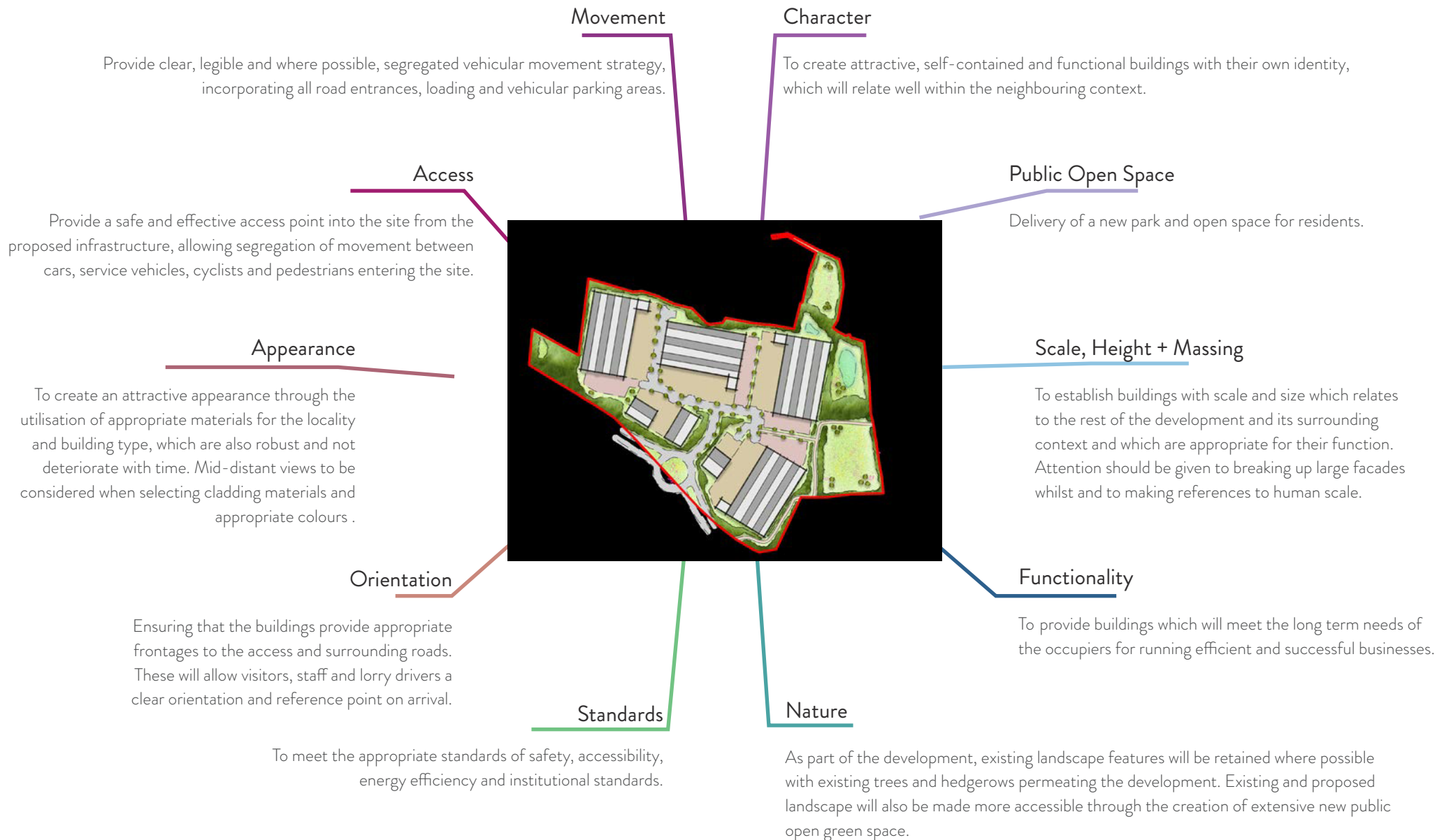
A45 / London Road

A423

Bagshaw Close

Concept Masterplan

DELIVERING A WELL DESIGNED PLACE



SUMMARY OF KEY BENEFITS



Creating jobs, investing in the area to support employment growth and economic stimulation.



Enhancement of public right of ways and improved connections to Steetley Meadows/Brandon Marsh.



Retention and enhancement of existing natural habitats.



The design seeks to minimise the impact on its surroundings; providing an opportunity for the development of attractive, contemporary and cohesive buildings that are fit for purpose and safe for all to use.

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*

**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

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

2. Agent's Details (if applicable)

(where relevant)

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	S3	Policies Map	Policies Map – Rugby and Ryton on Dunsmore inset
Site ID	71				

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.

We consider the plan to be unsound because it has not identified and allocated sufficient land for employment development to meet the identified needs across the sub-region. Tarmac's site at Ryton is capable of meeting identified employment land needs and should be allocated for employment development, in addition to the other sites as proposed to be allocated in the Publication Stage Plan.

A vision document as previously submitted at the Issues and Options Stage (and appended to this representation) outlines the location of the Tarmac site on London Road (A45) within 1.6km of the boundary with Coventry, where it meets the A46 at Tollbar End, in close proximity to Coventry Gateway South. The total site extends to 62 ha in size. It has been assessed and referenced by the Council as Site 71. It is also within Area 7 (West Midlands Strategic Employment Sites Study 2024).

We make two main points:

1. The Coventry and Warwickshire Alignment Paper (November 2025) confirms that additional sites should be allocated within Area 7 to account for a mistake in including 90ha of land at Coventry Gateway South in the supply – The Rugby Plan does not appear to engage with this requirement and therefore its contribution to the unmet need is insufficient; and

2. Coventry has a claimed 45 ha shortfall in the land that it has proposed to allocate in its Local Plan Review (based on the Reg 19 consultation Plan which is due to start

examination later this month). Whilst The Rugby Plan allocates 2.5 hectares of land to meet Coventry's requirements, its contribution to the unmet need is insufficient and it should allocate the Tarmac site to meet this shortfall.

How Much Land Should Rugby Borough Council be Planning For?

Paragraph 11 of the National Planning Policy Framework (NPPF), December 2024, states that plans should apply a presumption in favour of sustainable development. Paragraph 11b stated that for plan-making, "*strategic policies should, as a minimum, [our emphasis] provide for objectively assessed housing needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*". Para. 20a confirms that the delivery of employment development comprises a "strategic policy".

Section 6 of the NPPF is about building a strong, competitive economy. Para 86b states that planning policies should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet identified needs over the plan period. Para 86d confirms that policies should be flexible enough to accommodate needs not anticipated in the plan.

The key message from this guidance is to plan flexibly to meet needs in order to facilitate economic growth, not restrict it. The draft consultation version of NPPF (published in December 2025) reaffirms the Government's prioritisation of economic growth and intentions with regards to flexibility as part of a new proposed Policy E1 (which reworks paras. 86 and 87 of the current NPPF) in order to respond to changing commercial demands. It requires development plans to "*take a positive, proactive and realistic approach to encouraging sustainable economic growth having regard to the Industrial Strategy and other relevant strategic strategies*" (Policy E1.1a). It continues that plans should "*address potential barriers to growth*" (Policy E1.1b).

Whilst we recognise that the Council has allocated land within the Plan to meet its own needs and 2.5 hectares of Coventry's needs, our view is that this approach fails to adequately consider the sub-regional picture and thus fails to meet the minimum needs as required by NPPF and also fails to provide sufficient flexibility in terms of the quantum of land allocated to provide for economic growth. We also question whether the Council has provided a sufficient 'buffer' in providing for its own needs, in the interests of providing flexibility. In summary, it is not positively prepared as is the requirement.

The need for employment land is based on the West Midlands Strategic Employment Sites Study 2024 as updated through the Coventry and Warwickshire WMSESS Alignment Paper (September 2024) and the 2025 addendum (November 2025).

We note that the 2025 addendum updated the need for strategic sites following the erroneous inclusion of 90 hectares of land at Coventry Gateway South (within Area 7) as part of the supply. This site is less than 5km from our clients site which is also in Area 7. The effect is to increase the requirement for strategic sites by 90 hectares to 575-975 ha (table 2.1). It also states at para 2.9 that there is a potential need for two additional/mixed sites of a notional 50ha to be apportioned to meet the highest end of the needs range. At para. 2.10 it recommends that "*it would be appropriate for at least one of these additional sites i.e. 50 ha to be apportioned to Area 7*".

The Plan proposes to allocate five new sites for Class B2, B8 and E9g) (iii) employment development comprising 815,000 sqm in total (Policy S3). In contrast, the Previous version of the plan (Preferred Option, May 2025) proposed to allocate 945,000 sqm of floorspace (130,000 sqm more). The main change is the swapping out of the Prologis Park and Mountpark site (350,000 sqm) and adding in Walsgrave Hill (290,000 sqm). We also note that the quantum of floorspace at SW Rugby has reduced in the latest version (60,000sqm from 130,000sqm). However, whilst the Plan refers to "delivering

the sub-regional requirement as noted in the WMSESS Alignment Paper” the figures suggest that the issue of the additional requirement arising from the Coventry Gateway South error remains unmet. In the absence of additional sites in Coventry within Area 7, it would seem logical for the additional site requirement to be accommodated in Rugby, as close as possible to Coventry (and within Opportunity Area 7).

At this stage, we do not seek to challenge the figures derived through the sub-regional studies, merely to suggest that on the basis of the evidence provided, the Plan does not appear to address the sub-regional need for an additional 90 hectares of land within Area 7, which arose since the Preferred Options was published. If the Plan is to be positively prepared, promote growth and provide flexibility, it is reasonable to assume that the Plan should be planning to meet these ‘higher’ figures. Our view is that the plan cannot be found sound on the basis of the current approach.

In the Council’s Green Belt Exceptional Circumstances Topic Paper, it is commented that *“Opportunity Area 7 incorporates Coventry and Rugby and small parts of Nuneaton and Bedworth, and all junctions lie wholly or partly within Rugby Borough. Lack of available land at junctions means that (for the purposes of NPPF para 147(c)) there are no realistic non-Green Belt options for accommodating the residual large site need for Area 7 within the neighbouring authorities of Coventry, Warwick or Nuneaton and Bedworth. Indeed, Coventry City Council is also unable to accommodate part of its non-large-site ‘local need’ as documented in the memorandum of understanding between Coventry and Warwickshire authorities.”*

The Coventry City Council Regulation 19 Plan stated at para 3.14 *“The City Council is able to accommodate 60 ha of employment need with a remaining shortfall of 45 hectares which it is not able to accommodate within its own boundaries”*. Whilst the examination into that plan is ongoing, and the extent of this claimed shortfall may be subject to further debate at the examination, it seems unlikely to us, given the constrained nature of its boundaries, that Coventry will be able to identify more land to meet its own local needs.

Tarmac’s site at Ryton can accommodate this need and we set out the reasons for this below.

Suitability of London Road (Site 71)

The narrative above explains there is an additional requirement for a strategic site of up to 90 hectares and a requirement to meet Coventry’s local needs of 42.5 ha. Our assessment (Vision Document, October 2024) confirms that the site is capable of meeting a mix of strategic and local needs in the region of 76,000sqm of floorspace.

In terms of the HEDNA locational criteria (shown in italics) the following are relevant:

Road accessibility – sites should be located where they can be accessed from the strategic road network. The Tarmac site is on the A45 with links to the M45, M6 and M69.

Power Supply – sites should be located where there is sufficient power. The site is located close to the established Prologis Park (formerly Peugeot) where power can be extended as necessary.

Access to Labour – The site is strategically located close to Coventry where the majority of the labour force is located, accessible via the strategic road network and by public transport.

Neighbouring activities – sites should be located away from incompatible land uses.

The site abuts the western boundary of the settlement of Ryton, however there is potential for generous spacing of development away from the site's eastern boundaries, couples with landscape and, as necessary, acoustic buffers to both screen development from view and protect residents from noise. It should be noted that the existing dwellings are already close to the road and to Prologis Park Ryton.

NPPF para 145 explains that green belt boundaries should not be altered unless there are exceptional circumstances, for example where a local authority cannot meet its identified needs for homes, commercial or other development through other means. In this context, we attest that the site does need to be removed from the Green Belt because there is a need to accommodate employment development within Area 7 and meet Coventry's unmet needs as close to Coventry as possible (where the workforce are). This need can only be met with Green Belt release because there simply are no non-green belt sites along the A45 corridor.

We note that the Council has assessed Site 71 as part of its Stage 2 Assessment (December 2025). This assesses the site against Green Belt purposes, accessibility, ecology, landscape and heritage. We comment on each as follows:

- **Green Belt Purposes:** we wish to point out that other sites proposed to be removed from the Green Belt for employment development also score strongly against purposes A and C and make moderate contributions to purpose B (as assessed by the Council). Without advocating a different assessment at this stage, we simply note that this classification against Green Belt purposes is not fatal to a site being removed from the Green Belt and allocated for development.

- **Accessibility:** there appears to be some concern raised by National Highways about the impact of any new employment development in and around Area 7 on the Tollbar End junction. The impact of this development on that junction has been assessed with regard to the previous assessment work which saw the Prologis site taken out of the Plan because of impact on the Tollbar End junction. In contrast, Site 71 has one fifth of the traffic impact on that junction indicating there is no good reason in highway terms not to allocate this site (see attached technical note by Mode). The wider accessibility of the site for employment use was not a reason for the Prologis site being removed from the plan and is not considered to be an impediment to the allocation of this site for employment development. Conversely, through development the site's accessibility has the potential to be improved. A new roundabout junction has the potential to enhance highway safety by reducing vehicle speeds, and improve accident rates in respect of the number of right turn movements that may be necessary into Church Road which has seen collisions in the past. The attached technical note provides proportionate evidence that this is not a constraint to the site's development.

- **Ecology:** A baseline ecological appraisal of the site was carried out in May 2025 (this has been previously submitted to the Council). The site is to the immediate south of the Brandon Marshes SSSI which is owned and managed by Tarmac, leased to Warwickshire Wildlife Trust. The site itself comprises other neutral grassland, modified grassland, woodland, mixed-scrub, willow scrub, a pond a rural tree, bare ground, watercourses and hedgerows. All of the habitats are of moderate distinctiveness, apart from the species-rich hedgerows which are shown on the plan below - T3-T6 in green, extending into the site from the north and the orange line on the site's south eastern boundary. A small part of the site is identified as Brandon Gravel Pits (SSSI) (an isolated pocket to the westernmost part of the site) which will not be developed.

Figure 1: Baseline habitats at Land off London Road, Ryton-on-Dunsmore



In its stage 2 assessment, the Council suggested that "more than 40% of the site having medium or high distinctiveness...it is concluded that there are considerable constraints on the development of site 71". As set out above, this is an over-generalisation of the site's status. It is only the hedgerows that are of high distinctiveness and as demonstrated in the Vision document, can be retained whilst accommodating employment development. These represent less than 5% of the site area. The features of medium distinctiveness do not represent a reason for the site not to be developed. In addition, the baseline ecology assessment also concludes that the watercourses can be protected and any runoff directed away from the SSSI satisfactorily. In addition, Tarmac's wider site ownership offers the potential to further enhance biodiversity and to extend countryside access for greater public benefit. A preliminary assessment of the ability of the site to meet the mandatory BNG requirements has been undertaken and confirms that these can be viably accommodated.

- **Landscape:** We note that the site is not of high landscape value and whilst there are some historic field patterns evident, this is not a constraint to development.

Importantly, the site is deliverable over the plan period, can be viably brought forward including an allowance for project costs including extent of highway works planned, BNG obligations and other requirements.

Based on the above, the site is suitable for development and the following exceptional circumstances apply:

- Demonstrable employment need
- Lack of non-green belt land within Area 7
- Ability to achieve highway safety improvements
- Impacts on ecology are not widespread and can be mitigated

- Benefits of public access/extension of existing country park

The site's development would be consistent with achieving sustainable development and would serve to meet significant shortfalls in employment land floorspace to meet local and strategic needs.

In summary, the Plan is unsound because it is not positively prepared, failing to adequately allocate enough land to meet employment needs. The current approach is not justified. The evidence suggests need is greater and this cannot reasonably be provided elsewhere. The Plan is not effective as cross-boundary matters are not resolved in the face of evidence that the additional employment needs must logically be accommodated in Rugby.

The Tarmac site (Site 71) can plug this gap and should be allocated for employment development as set out below.

Attachments:

Vision Document, 'Tarmac Site, Brandon', October 2024.

(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.

Proposed Modifications to the Plan:

We suggest that Policy S3 be amended to add the Tarmac Site as follows (bold text is new, underlined is amended):

S3 Strategy for employment land

A. To meet Rugby Borough's need for employment land in the period 2025-2042 the following levels of new employment development will be delivered:

i. 19,761.3m² of use class E(g)(i) and (ii) office floorspace (approx. 3.95 hectares)

ii. 1,034,000m² (approx. 287 hectares) of floorspace for use classes B2, E(g) (iii), and B8

B. New floorspace in use classes B2, B8 and E(g) (iii) will be delivered in the locations set out in the table below:

Source	Approx. sqm of floorspace 2025-2042
Prospero Ansty and Ansty Park	26,663
Coton Park east of Castle Mound Wy	26,421
Padge Hall Farm	137,730
Houlton remaining employment land	15,000
Employment planning permissions on small sites as at 1 April 2025	13,429.4
New allocations under policy S7:	
Crownor 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
London Road, Ryton	70,600
TOTAL	<u>1,104,843</u>

(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)

Yes, I wish to participate in hearing session(s)

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

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

To fully explore the Council’s approach to the allocation of employment land and to test its justification for not allocating more land to meet Coventry’s needs, including Tarmac’s site at Ryton (site 71).

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

Not used.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council’s website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

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*

**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

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

2. Agent's Details (if applicable)

(where relevant)

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	S7	Policies Map	Policies Map – Rugby and Ryton on Dunsmore inset
Site ID	71				

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.

We consider the plan to be unsound because it has not identified and allocated sufficient land for employment development to meet the identified needs across the sub-region. Tarmac's site at Ryton is capable of meeting identified employment land needs and should be allocated for employment development, in addition to the other sites as proposed to be allocated in the Publication Stage Plan.

A vision document as previously submitted at the Issues and Options Stage (and appended to this representation) outlines the location of the Tarmac site on London Road (A45) within 1.6km of the boundary with Coventry, where it meets the A46 at Tollbar End, in close proximity to Coventry Gateway South. The total site extends to 62 ha in size. It has been assessed and referenced by the Council as Site 71. It is also within Area 7 (West Midlands Strategic Employment Sites Study 2024).

We make two main points:

1. The Coventry and Warwickshire Alignment Paper (November 2025) confirms that additional sites should be allocated within Area 7 to account for a mistake in including 90ha of land at Coventry Gateway South in the supply – The Rugby Plan does not appear to engage with this requirement and therefore its contribution to the unmet need is insufficient; and

2. Coventry has a claimed 45 ha shortfall in the land that it has proposed to allocate in its Local Plan Review (based on the Reg 19 consultation Plan which is due to start

examination later this month). Whilst The Rugby Plan allocates 2.5 hectares of land to meet Coventry's requirements, its contribution to the unmet need is insufficient and it should allocate the Tarmac site to meet this shortfall.

How Much Land Should Rugby Borough Council be Planning For?

Paragraph 11 of the National Planning Policy Framework (NPPF), December 2024, states that plans should apply a presumption in favour of sustainable development. Paragraph 11b stated that for plan-making, "*strategic policies should, as a minimum, [our emphasis] provide for objectively assessed housing needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*". Para. 20a confirms that the delivery of employment development comprises a "strategic policy".

Section 6 of the NPPF is about building a strong, competitive economy. Para 86b states that planning policies should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet identified needs over the plan period. Para 86d confirms that policies should be flexible enough to accommodate needs not anticipated in the plan.

The key message from this guidance is to plan flexibly to meet needs in order to facilitate economic growth, not restrict it. The draft consultation version of NPPF (published in December 2025) reaffirms the Government's prioritisation of economic growth and intentions with regards to flexibility as part of a new proposed Policy E1 (which reworks paras. 86 and 87 of the current NPPF) in order to respond to changing commercial demands. It requires development plans to "*take a positive, proactive and realistic approach to encouraging sustainable economic growth having regard to the Industrial Strategy and other relevant strategic strategies*" (Policy E1.1a). It continues that plans should "*address potential barriers to growth*" (Policy E1.1b).

Whilst we recognise that the Council has allocated land within the Plan to meet its own needs and 2.5 hectares of Coventry's needs, our view is that this approach fails to adequately consider the sub-regional picture and thus fails to meet the minimum needs as required by NPPF and also fails to provide sufficient flexibility in terms of the quantum of land allocated to provide for economic growth. We also question whether the Council has provided a sufficient 'buffer' in providing for its own needs, in the interests of providing flexibility. In summary, it is not positively prepared as is the requirement.

The need for employment land is based on the West Midlands Strategic Employment Sites Study 2024 as updated through the Coventry and Warwickshire WMSESS Alignment Paper (September 2024) and the 2025 addendum (November 2025).

We note that the 2025 addendum updated the need for strategic sites following the erroneous inclusion of 90 hectares of land at Coventry Gateway South (within Area 7) as part of the supply. This site is less than 5km from our clients site which is also in Area 7. The effect is to increase the requirement for strategic sites by 90 hectares to 575-975 ha (table 2.1). It also states at para 2.9 that there is a potential need for two additional/mixed sites of a notional 50ha to be apportioned to meet the highest end of the needs range. At para. 2.10 it recommends that "*it would be appropriate for at least one of these additional sites i.e. 50 ha to be apportioned to Area 7*".

The Plan proposes to allocate five new sites for Class B2, B8 and E9g) (iii) employment development comprising 815,000 sqm in total (Policy S3). In contrast, the Previous version of the plan (Preferred Option, May 2025) proposed to allocate 945,000 sqm of floorspace (130,000 sqm more). The main change is the swapping out of the Prologis Park and Mountpark site (350,000 sqm) and adding in Walsgrave Hill (290,000 sqm). We also note that the quantum of floorspace at SW Rugby has reduced in the latest version (60,000sqm from 130,000sqm). However, whilst the Plan refers to "delivering

the sub-regional requirement as noted in the WMSESS Alignment Paper” the figures suggest that the issue of the additional requirement arising from the Coventry Gateway South error remains unmet. In the absence of additional sites in Coventry within Area 7, it would seem logical for the additional site requirement to be accommodated in Rugby, as close as possible to Coventry (and within Opportunity Area 7).

At this stage, we do not seek to challenge the figures derived through the sub-regional studies, merely to suggest that on the basis of the evidence provided, the Plan does not appear to address the sub-regional need for an additional 90 hectares of land within Area 7, which arose since the Preferred Options was published. If the Plan is to be positively prepared, promote growth and provide flexibility, it is reasonable to assume that the Plan should be planning to meet these ‘higher’ figures. Our view is that the plan cannot be found sound on the basis of the current approach.

In the Council’s Green Belt Exceptional Circumstances Topic Paper, it is commented that *“Opportunity Area 7 incorporates Coventry and Rugby and small parts of Nuneaton and Bedworth, and all junctions lie wholly or partly within Rugby Borough. Lack of available land at junctions means that (for the purposes of NPPF para 147(c)) there are no realistic non-Green Belt options for accommodating the residual large site need for Area 7 within the neighbouring authorities of Coventry, Warwick or Nuneaton and Bedworth. Indeed, Coventry City Council is also unable to accommodate part of its non-large-site ‘local need’ as documented in the memorandum of understanding between Coventry and Warwickshire authorities.”*

The Coventry City Council Regulation 19 Plan stated at para 3.14 *“The City Council is able to accommodate 60 ha of employment need with a remaining shortfall of 45 hectares which it is not able to accommodate within its own boundaries”*. Whilst the examination into that plan is ongoing, and the extent of this claimed shortfall may be subject to further debate at the examination, it seems unlikely to us, given the constrained nature of its boundaries, that Coventry will be able to identify more land to meet its own local needs.

Tarmac’s site at Ryton can accommodate this need and we set out the reasons for this below.

Suitability of London Road (Site 71)

The narrative above explains there is an additional requirement for a strategic site of up to 90 hectares and a requirement to meet Coventry’s local needs of 42.5 ha. Our assessment (Vision Document, October 2024) confirms that the site is capable of meeting a mix of strategic and local needs in the region of 76,000sqm of floorspace.

In terms of the HEDNA locational criteria (shown in italics) the following are relevant:

Road accessibility – sites should be located where they can be accessed from the strategic road network. The Tarmac site is on the A45 with links to the M45, M6 and M69.

Power Supply – sites should be located where there is sufficient power. The site is located close to the established Prologis Park (formerly Peugeot) where power can be extended as necessary.

Access to Labour – The site is strategically located close to Coventry where the majority of the labour force is located, accessible via the strategic road network and by public transport.

Neighbouring activities – sites should be located away from incompatible land uses.

The site abuts the western boundary of the settlement of Ryton, however there is potential for generous spacing of development away from the site's eastern boundaries, couples with landscape and, as necessary, acoustic buffers to both screen development from view and protect residents from noise. It should be noted that the existing dwellings are already close to the road and to Prologis Park Ryton.

NPPF para 145 explains that green belt boundaries should not be altered unless there are exceptional circumstances, for example where a local authority cannot meet its identified needs for homes, commercial or other development through other means. In this context, we attest that the site does need to be removed from the Green Belt because there is a need to accommodate employment development within Area 7 and meet Coventry's unmet needs as close to Coventry as possible (where the workforce are). This need can only be met with Green Belt release because there simply are no non-green belt sites along the A45 corridor.

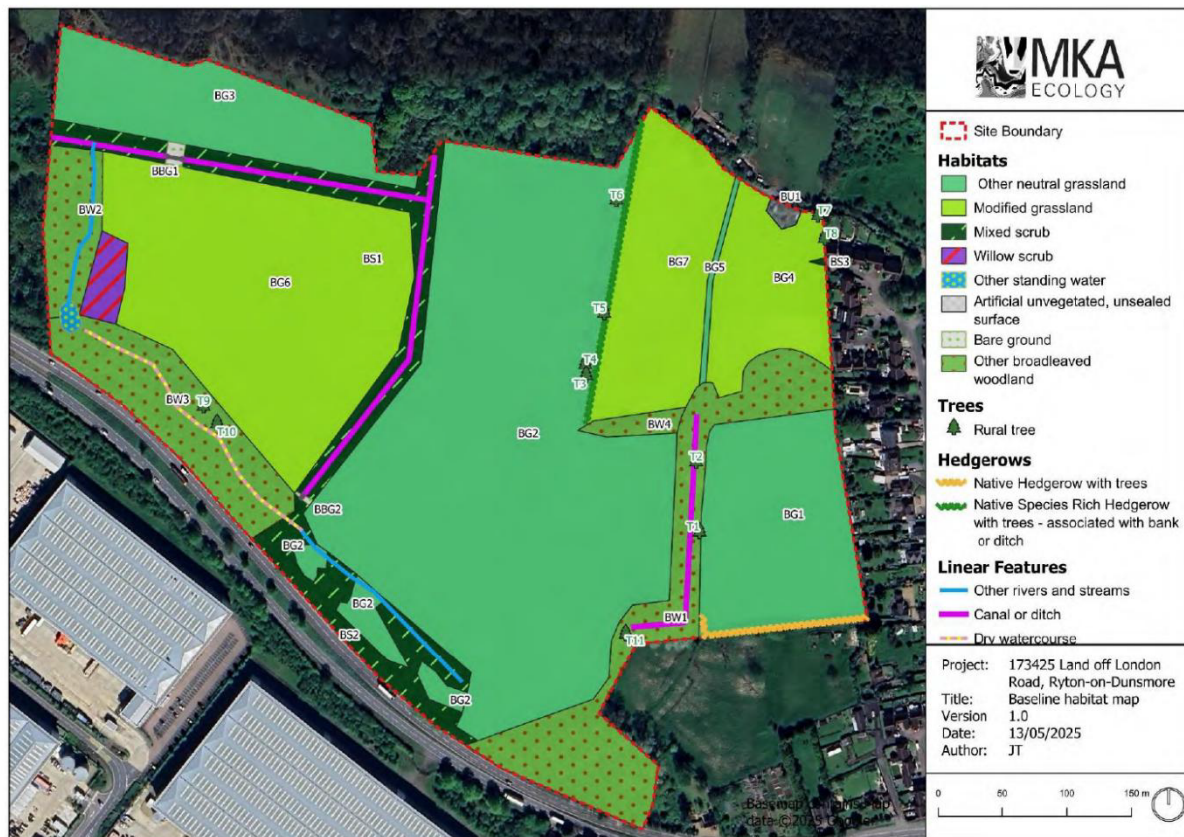
We note that the Council has assessed Site 71 as part of its Stage 2 Assessment (December 2025). This assesses the site against Green Belt purposes, accessibility, ecology, landscape and heritage. We comment on each as follows:

- **Green Belt Purposes:** we wish to point out that other sites proposed to be removed from the Green Belt for employment development also score strongly against purposes A and C and make moderate contributions to purpose B (as assessed by the Council). Without advocating a different assessment at this stage, we simply note that this classification against Green Belt purposes is not fatal to a site being removed from the Green Belt and allocated for development.

- **Accessibility:** there appears to be some concern raised by National Highways about the impact of any new employment development in and around Area 7 on the Tollbar End junction. The impact of this development on that junction has been assessed with regard to the previous assessment work which saw the Prologis site taken out of the Plan because of impact on the Tollbar End junction. In contrast, Site 71 has one fifth of the traffic impact on that junction indicating there is no good reason in highway terms not to allocate this site (see attached technical note by Mode). The wider accessibility of the site for employment use was not a reason for the Prologis site being removed from the plan and is not considered to be an impediment to the allocation of this site for employment development. Conversely, through development the site's accessibility has the potential to be improved. A new roundabout junction has the potential to enhance highway safety by reducing vehicle speeds, and improve accident rates in respect of the number of right turn movements that may be necessary into Church Road which has seen collisions in the past. The attached technical note provides proportionate evidence that this is not a constraint to the site's development.

- **Ecology:** A baseline ecological appraisal of the site was carried out in May 2025 (this has been previously submitted to the Council). The site is to the immediate south of the Brandon Marshes SSSI which is owned and managed by Tarmac, leased to Warwickshire Wildlife Trust. The site itself comprises other neutral grassland, modified grassland, woodland, mixed-scrub, willow scrub, a pond a rural tree, bare ground, watercourses and hedgerows. All of the habitats are of moderate distinctiveness, apart from the species-rich hedgerows which are shown on the plan below - T3-T6 in green, extending into the site from the north and the orange line on the site's south eastern boundary. A small part of the site is identified as Brandon Gravel Pits (SSSI) (an isolated pocket to the westernmost part of the site) which will not be developed.

Figure 1: Baseline habitats at Land off London Road, Ryton-on-Dunsmore



In its stage 2 assessment, the Council suggested that "more than 40% of the site having medium or high distinctiveness...it is concluded that there are considerable constraints on the development of site 71". As set out above, this is an over-generalisation of the site's status. It is only the hedgerows that are of high distinctiveness and as demonstrated in the Vision document, can be retained whilst accommodating employment development. These represent less than 5% of the site area. The features of medium distinctiveness do not represent a reason for the site not to be developed. In addition, the baseline ecology assessment also concludes that the watercourses can be protected and any runoff directed away from the SSSI satisfactorily. In addition, Tarmac's wider site ownership offers the potential to further enhance biodiversity and to extend countryside access for greater public benefit. A preliminary assessment of the ability of the site to meet the mandatory BNG requirements has been undertaken and confirms that these can be viably accommodated.

- **Landscape:** We note that the site is not of high landscape value and whilst there are some historic field patterns evident, this is not a constraint to development.

Importantly, the site is deliverable over the plan period, can be viably brought forward including an allowance for project costs including extent of highway works planned, BNG obligations and other requirements.

Based on the above, the site is suitable for development and the following exceptional circumstances apply:

- Demonstrable employment need
- Lack of non-green belt land within Area 7
- Ability to achieve highway safety improvements
- Impacts on ecology are not widespread and can be mitigated

- Benefits of public access/extension of existing country park

The site's development would be consistent with achieving sustainable development and would serve to meet significant shortfalls in employment land floorspace to meet local and strategic needs.

In summary, the Plan is unsound because it is not positively prepared, failing to adequately allocate enough land to meet employment needs. The current approach is not justified. The evidence suggests need is greater and this cannot reasonably be provided elsewhere. The Plan is not effective as cross-boundary matters are not resolved in the face of evidence that the additional employment needs must logically be accommodated in Rugby.

The Tarmac site (Site 71) can plug this gap and should be allocated for employment development as set out below.

Attachments:

Vision Document, 'Tarmac Site, Brandon', October 2024.

(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 cooperate 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.

Proposed Modifications to the Plan:

We suggest that Policy S7 be amended to add the Tarmac Site as follows (bold text is new, underlined is amended):

S 7 Proposed submission Local Plan Employment allocations

A. The sites shown on the policies map and set out in the development site allocations annex to this plan are allocated for development as detailed below.

B. The development of the sites shall accord with the development principles set out in the development site allocations annex and with other policies of this plan.

Site ref.	Site name	Floorspace
64	Coton Park East	Circa 115,000m ²
17	South West Rugby employment phase 2	Circa 60,000m ²
14	North of Ansty Park	Circa 75,000m ²
95	Crowner Fields Farm and Home Farm, Ansty	Circa 275,000m ²
121	Land at Walsgrave Hill	Circa 290,000m ²
71	London Road, Ryon on Dunsmore	Circa 70,600m²

Total 885,600m²

Proposed Modifications to the Proposals Map and Ryton on Dunsmore inset map:

The land identified as site 71 should be identified for employment development on the policies map, save for the land in the south western corner identified as a SSSI, which should be excluded.

(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)

Yes, I wish to participate in hearing session(s)

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

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

To fully explore the Council's approach to the allocation of employment land and to test its justification for not allocating more land to meet Coventry's needs, including Tarmac's site at Ryton (site 71).

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

Not used.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>