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From: M Willis [REDACTED]
Sent: 28 February 2026 17:20
To: Local Plan
Subject: Local Plan - Employment Allocation (S3 & S7) for Coton Park East (Site 64)

I am writing to object to the proposal for employment allocation at Coton Park East (Site 64) within the Local Plan.

Whilst I understand the Council is obliged to build a number of houses to comply with Central Government Policy, I believe there is no similar requirement for a minimum volume of industrial build. Below is a number of points which I believe question the methodology and evidence used to establish a clear need for this new industrial allocation:

- Rugby Borough Council references four documents to arrive at their choice of employment land to provide 1,053,761.3 square metres of floor space by 31 March 2042. These are:
 - A report by Rugby’s Chief Planning Officer in December 2025 called *Topic Paper: Development Needs*. This sets out the background to the 1,053,761.3 square metres of “need” and provides an audit trail to three earlier documents.
 - A report written by Rugby Borough Council’s consultants, Icen Projects Ltd, a month earlier in November 2025 called *Coventry & Warwickshire Employment Needs: Addendum to the Coventry & Warwickshire Alignment Paper*.
 - A report written by Rugby Borough Council’s consultants, Icen Projects Ltd, in November 2024 called *Coventry & Warwickshire HEDNA-WMSESS Alignment Paper*.
 - Finally a report written by a consortium of four consultants, including Icen Projects Ltd, for Dudley Metropolitan Borough Council in August 2024 called *West Midlands Strategic Employment Sites Study 2023/24*.
- The *West Midlands Strategic Employment Sites Study 2023/24 (WMSESS)* does not cover all of the West Midlands and does not address the impact on Rugby of the **additional** 122 hectares of employment land proposed by Harborough District Council at Mere Lane, Magna Park or the 106 **additional** hectares of employment land proposed by West Northamptonshire Council at DIRFT, Crick. (Whilst both these sites are within seven miles of Rugby’s town centre they lie in the East Midlands rather than the West Midlands).
- The authors of the *WMSESS* had four answers to the question of how much space the West Midlands needed ranging from 7.9 million square metres to 14.9 million square metres. The top end of their range was almost twice as high as the bottom end of their range. Their two middle answers ranged from 10.0 million square metres to 12.9 million square metres.
- The next thing the authors of the *WMSESS* did was to look at nine areas within the West Midlands. Only one of these areas, area 7, needs to worry us. Area 7 contains most of Coventry and parts of six other local authorities including Rugby. They then divided up the land needed over the nine areas and decided area 7 should have anywhere between 75 and 150 hectares of strategic space for “big boxes”.

- If the consultants thought the range of need lay somewhere between 75 hectares and 150 hectares with their second answer being **twice as big** as their first how could anyone logically come to the conclusion that you could predict need to the nearest one tenth of a square metre? We can also note that on the very borders of Rugby West Northamptonshire Council and Harborough District Council are proposing a total allocation of 228 hectares which is **one and a half times** the size of the total maximum proposed allocation for the whole of area 7.
- In November last year came news that one of the consultants behind the *WMSESS* recognised that they had made two significant mistakes in the study. One mistake in particular underestimated the “need” for strategic sites by 90 hectares. Rather than redo the study the consultants decided they would take 50 of the 90 hectares mistake and allocate it to area 7. This now gave area 7 a range of “need” of strategic sites for big boxes between 125 hectares and 200 hectares. Had the error been spread out evenly between the nine areas then the range would have been 85 hectares to 160 hectares.
- In December last year the Chief Planning Officer decided first to ignore all the lower estimates of “need” and just take the top estimate of 200 hectares and secondly that the entire “need” for area 7 should be met within the Rugby Borough Council area.
- The total estimate for employment land in Rugby has been calculated using four different sources:
 - The need for office space has been calculated using a forecast for the increase in office workers in Rugby to 31 March 2042 and multiplying this by 14 square metres of office space to give a total need for office space.
 - The need for small (less than 9,000 square metres or [sources vary] 9,300 square metres units comes from the rate at which these units have been built over the last twelve years.
 - The need for “big boxes” on non-strategic sites has been taken from an estimate of need for Coventry & Warwickshire and then an assumption that Rugby should take just over a quarter (25.5%) of that need – despite the fact that no such unit has been built in Rugby over the last twelve years.
 - Finally the need for “big boxes” on strategic sites has been taken as shown in paragraph 12 by taking the largest “need” for area 7 [ignoring other calculations of need which were 37.5% smaller and then assuming that all the area 7 “need” should be built in our borough.
- At an earlier stage in the calculations the number of hectares required for a “strategic site” was increased by 10% to allow for the fact that some “strategic sites” also had smaller units built on them – taking up on average 10% of the strategic sites. However the 10% of the area of the “strategic sites” which was calculated to be available for smaller sites was **not** deducted from the area required for the smaller units. This results in an overestimate of the space available.
- We can do a reality check on the floorspace required by comparing the approach Rugby Borough Council has taken to calculating office space need and the figure it places on industrial and warehouse needs. The figure for offices starts with the projected increase in full time equivalent office jobs, adds another couple of steps and uses fourteen square metres per job to arrive at the amount of office

space required. HMG figures for the amount of space taken up by industrial and warehouse workers are 44 square metres for an industrial worker and 80 square metres for a warehouse worker. The majority of the “big box” space RBC is planning for will be warehouse space so I will use the higher figure of 80 square metres per worker. The 1,034,000 square metres RBC is proposing would provide space for 12,925 additional workers. However the total growth in Rugby’s workforce to 31 March 2042 is only expected to be 6,800 workers and only some 2,300 of these are expected to take up work in the warehousing sector. That means that over ten thousand workers would have to commute into our borough to staff the extra space. More commuters, more cars, more congestion.

- Finally Rugby cannot find the almost thirteen thousand extra workers to staff these warehouses and Lutterworth (with a population of around eleven thousand) cannot find all the extra workers required at Magna Park. As for Crick its entire population from babes in arms to centenarians would have to work double shifts to staff the extra workers required at DIRFT.

Regardless of the robustness and validity of the evidence used to determine the extent of need for employment allocation, there are also questions about why this particular site has been deemed to be appropriate for such use. I believe this land was initially allocated for residential usage but the landowner has stated no one is willing to purchase the land for residential, and therefore the landowner owner has requested the Council change the usage to employment. If the land could not be used for residential, then why can it not simply be left as is rather than be allocated for employment, given there is no central government diktat regarding the minimum volume of employment allocation necessary?

I believe use of Site 64 for employment allocation contravenes the environmental considerations detailed in sections EN1, EN2, EN7 and EN8, and the infrastructure considerations detailed in sections I1 of the Local Plan. Of particular concern is the access to and from the proposed site, where the state of the roads (A426 and roads from A426 into Coton Park) is already in very poor condition (multiple large potholes) and this will be exacerbated by increased LGV and possibly HGV traffic.

If objections to this proposal are unsuccessful then I request robust mitigations are stipulated in the planning process, some of which I believe may already be under consideration. These should include monitoring and controls around noise and air pollution, measures to maintain pedestrian safety (noting increased risks associated with proximity of school), and a strong commitment to better maintenance of roads in the area.

Mr Mark Willis

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