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Site Boundary (Red) 39.23 acres / 15.88 ha

Willenhall Wood

South Coventry Royal Mail Sorting Office

Pilot Trade Park

Orchard Retail Park

A46

A 46

A 45 LONDON ROAD

Tollbar End
on currently under
development)

BRANDON LANE

Cardiff Close

Weymouth Close

Glamorgan Close

MONTGOMERY CLOSE

Metres

no.	date	revision	by

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client

project

Land off Brandon Lane
Coventry

drawing

Site Boundary Plan

scale 1:500 @ A0 drawn MD

checked TW date 08/02/2016

no

6000 - 001

PRELIMINARY

To Coventry Centre and Rail Station

To M6 junction 2 and M69

To University of Warwick

To Rugby

THE SITE

C&W INVESTMENT ZONE

Whitley

Whitley East

Whitley South

Willenhall

Airport Retail Park

Willenhall Wood

Black Spinney

Long Spinney

The Pools

Pit (dis)

Lower Farm

Brandon Grounds Farm

Brandon Marsh Nature Reserve

Old Hare Covert

Ryton Bridge

Tollbar End

Stonebridge Trading Estate

Stonebridge Meadows

Balancing Pond

River Sowe Bridge

Willenhall Bridge

Playing Field

Whitley Grove

Works

Schs

Pol Sta

Resr

Acad

Sch

Liby

Recn Gd

Met Dist Bdy

Spr

FB

A 444

A 45

A 46

A 423

B 4110

Rowley Road

The Lunt

ROMAN FORT (partly reconstructed)

Castle (remains of)

PO

Home Farm

Oak Farm

Baginton

BAGINTON CP

UK Battery Industrialisation Centre

F Sta

Greenpower Park

Segro Park

Middlemarch Business Park

CP Bdy

Hotel

Sluice

Sewage Works

Prologis Park

Manor Farm

Coney Grey Farm

Ryton Lodge

Warren Farm

Rock Spinney

Gospel Oak

Way & Shakespeare's Avon Way

Oxfor

try Heath

notes

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0m 200m 400m

Scale 1:5000

no.	date	revision	by
A	02.03.26	Minor revisions	ZI

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client

Windsor Developments Ltd

project

Land Off Brandon Lane
Coventry CV3 3GU

drawing

Site Context Plan

scale	1:5000 @ A0	drawn	ZI
checked	spp	date	26-02-2026

no

6000 - 008 A

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Amtico Training & Distribution Center

South Coventry
Royal Mail
Sorting Office

Pilot trade Park
units 1-14

Orchard Retail Park

A46

Earth bunding & planting

Attenuation Pond

Biodiversity Offset Habitat

Highways access
to underbridge

A46 NORTHBOUND

A46 SOUTHBOUND

Earth bunding & planting

50m Service Area

Two Storey Offices

2no. Level
Entry Doors

30no. Dock Levellers

Car Parking 163no. spaces

UNIT 2

50m Service Area

2no. Level
Entry Doors

15no. Dock Levellers

UNIT 1

Two Storey Offices

Car Parking 70no. spaces

Estate Road

Tollbar Island

A46

A46

Underground Stormwater
Retention Tank (Highways)

Biodiversity Offset Habitat

0.449 acres / 0.181ha

BRANDON LANE

A45 LONDON ROAD

SISKIN DRIVE

LINAKER

ROYAL CLOSE

OSMA CLOSE

PUTTRELL CLOSE

PUTTRELL CLOSE

MONTGOMERY CLOSE

0m 100m 200m

Scale

Schedule of Accommodation

All areas are approximate gross internal

Unit 1		
Warehouse	12,821 sq.m.	138,000 sq.ft.
Offices Two Storey	1,115 sqm.	12,000 sq.ft.
Total	13,936 sq.m.	150,000 sq.ft.
Car Spaces	70 Spaces	
Plot Area	2.58 hec.	6.38 acres
Unit 2		
Warehouse	29,729 sq.m.	320,000 sq.ft.
Offices Three Storey	2,787 sqm.	30,000 sq.ft.
Total	32,516 sq.m.	350,000 sq.ft.
Car Spaces	163 Spaces	
Plot Area	5.23 hec.	12.93 acres
Total Development	46,452 sq.m.	500,000 sq.ft.
Total Site Area	16.07 Ha	39.71 acres

no. date revision by

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client

Windsor Developments Ltd

project

Land Off Brandon Lane
Coventry CV3 3GU

drawing

Indicative Site Plan
Option 1

scale 1:1250 @ A1 drawn ZI

checked tw date 03/04/2018

no

6000 - 003 A

PRELIMINARY

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A46

Amtico Training & Distribution Center

South Coventry Royal Mail Sorting Office

Pilot trade Park units 1-14

Orchard Retail Park

Earth bunding & planting

Highways access to underbridge

A46 NORTHBOUND

A46 SOUTHBOUND

Earth bunding & planting

UNIT 6

30m Service Area

Car Parking 20no. spaces

Two Storey Offices

4no. Level Entry Doors

30m Service Area

UNIT 5

4no. Level Entry Doors

Two Storey Offices

Car Parking 20no. spaces

50m Service Area

UNIT 3

2no. Level Entry Doors

8no. Dock Levellers

Two Storey Offices

Car Parking 39no. spaces

Car Parking 46no. spaces

Two Storey Offices

Attenuation Pond

50m Service Area

2no. Level Entry Doors

10no. Dock Levellers

UNIT 4

50m Service Area

2no. Level Entry Doors

15no. Dock Levellers

UNIT 2

Two Storey Offices

Car Parking 70no. spaces

Biodiversity Offset Habitat

Biodiversity Offset Habitat

Underground Stormwater Retention Tank (Highways)

Estate Road

Car Parking 9no. spaces

First Floor Offices

30m Service Area

2no. Level Entry Doors

UNIT 1

0.449 acres / 0.181ha

BRANDON LANE

A45 LONDON ROAD

SISKIN DRIVE

Tollbar Island

A46

A46

MONTGOMERY CLOSE

PEGRAM CLOSE

PEGRAM CLOSE

COLNE CLOSE

COLNE CLOSE

LINAKER

0m 100m 200m

Scale

Schedule of Accommodation

All areas are approximate gross internal

Unit 1			
Warehouse	1,905 sq.m.	20,500 sq.ft.	
Offices First Floor	186 sq.m.	2,000 sq.ft.	
Total	2,091 sq.m.	22,500 sq.ft.	
Car Spaces	9 Spaces		
Plot Area	0.57 hec.	1.41 acres	
Unit 2			
Warehouse	12,821 sq.m.	138,000 sq.ft.	
Offices Two Storey	1,115 sqm.	12,000 sq.ft.	
Total	13,936 sq.m.	150,000 sq.ft.	
Car Spaces	70 Spaces		
Plot Area	2.58 hec.	6.38 acres	
Unit 3			
Warehouse	7,432 sq.m.	80,000 sq.ft.	
Offices Two Storey	743 sqm.	8,000 sq.ft.	
Total	8,175 sq.m.	88,000 sq.ft.	
Car Spaces	39 Spaces		
Plot Area	1.72 hec.	4.26 acres	
Unit 4			
Warehouse	8,454 sq.m.	91,000 sq.ft.	
Offices Two Storey	836 sqm.	9,000 sq.ft.	
Total	9,290 sq.m.	100,000 sq.ft.	
Car Spaces	46 Spaces		
Plot Area	1.89 hec.	4.67 acres	
Unit 5			
Warehouse	4,645 sq.m.	50,000 sq.ft.	
Offices Two Storey	465 sqm.	5,000 sq.ft.	
Total	5,110 sq.m.	55,000 sq.ft.	
Car Spaces	26 Spaces		
Plot Area	1.19 hec.	2.93 acres	
Unit 6			
Warehouse	3,530 sq.m.	38,000 sq.ft.	
Offices Two Storey	372 sqm.	4,000 sq.ft.	
Total	3,902 sq.m.	42,000 sq.ft.	
Car Spaces	20 Spaces		
Plot Area	0.88 hec.	2.17 acres	
Total Development	42,504 sq.m.	457,500 sq.ft.	
Total Site Area	16.07 Ha	39.71 acres	

no. date revision by

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client

Windsor Developments Ltd

project

Land Off Brandon Lane
Coventry CV3 3GU

drawing

Indicative Site Plan
Option 2

scale 1:1250 @ A1 drawn Zi

checked TW date 03/04/2018

no

6000 - 004 A

PRELIMINARY

Rugby Local Plan Reg 19 Submission

Transport Note

DTA

Transport Planning Consultants

1.0 INTRODUCTION AND CONTEXT

1.1 This report has been prepared by DTA Transportation (DTA) on behalf of Windsor Developments Ltd, to support a proposed employment allocation as part of the Rugby Local Plan Reg 19 Submission.

1.2 The proposed allocation comprises of new industrial, storage and distribution uses (Classes E(g)(iii), B2 and B8) on Land North of Brandon Lane in the Borough of Rugby. There are two design options presented at present. Option 1 comprises two units with a total floor area of 46,452sqm. Option 2 comprises six units with a total floor area of 42,504sqm.

1.3 As shown on both indicative site plans at **Appendix A**, one principal access is proposed to serve the development from Brandon Lane.

1.4 The latest version of the National Planning Policy Framework (NPPF) was published in December 2024 and sets out the government's planning policies for England and how these are expected to be applied.

1.5 Paragraph 115 of the NPPF is clear that:

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code48; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

1.6 The site is clearly and demonstrably appropriate for employment development.

2.0 DEVELOPMENT PROPOSALS

Access Options

2.1 As shown on both indicative site plans, one principal vehicle access is proposed to serve the development from Brandon Lane.

2.2 At present the London Road/ Brandon Lane junction is not suitable for left-in, left-out HGVs turning movements. Therefore, to accommodate HGVs, it is proposed that the junction would need to be widened to a 20m radii as shown in **Drawing 26002-01-03a** at **Appendix B**. Brandon Lane will also be widened to 7.3m to accommodate HGV movements.

2.3 In regard to pedestrian and cycle access a 3.0m wide footway/ cycleway is proposed on the northern side of Brandon Lane and a 2.0m wide footway on the southern side. This is also shown in **Drawing 26001-01-03a**. There are no constraints anticipated to the provision of the 3.0m wide footway/ cycleway, as the site frontage lies within the control of Windsor Developments Ltd.

2.4 To the north of the site, an alternate pedestrian and cycle route passes under the A46 Coventry Eastern Bypass and connects to a footpath adjacent to Amito Training and Distribution Centre. Yet, at present this route is obstructed due to vehicles using the underpass.

2.5 Therefore, the potential access options are in accordance with NPPF Paragraph 115, Point b which states that '*safe and suitable access to the site can be achieved for all users*'.

A46 Improvements

2.6 The A45/ A46 Tollbar End junction was subject to significant, strategic improvements undertaken by National Highways as part of a wider strategic to unlock congestion on the A45 / A46 corridor. The final scheme in that plan (Walsgrave Junction) has just received DCO approval and is expected to commence on site in Autumn 2026 and be

open to traffic in 2028.

2.7 **Car Parking Provision**

2.8 The maximum car parking standards are set out in Appendix 5 of the Rugby Local Plan 2011-2031. As the site is located outside the town of Rugby, it falls within a 'low access' area.

2.9 The indicative site plan shows Option 1 is proposed to provide a total of 203 car parking spaces while Option 2 is proposed to provide a total of 210 car parking spaces. This is well within the maximum standards set out in the current policy.

2.10 It should be noted that the site plans in **Appendix A** are illustrative and the precise details on floorspace and site layout arrangements would be negotiated.

2.11 There is scope to a secure a Travel Plan through the S106 agreement or other planning condition to reduce car use and improve public transport access to the site.

3.0 SUSTAINABILITY APPRAISAL

Walk and Cycle

3.1 There are currently no footway provisions along Brandon Lane until around 150m east of London Road/ Brandon Lane junction, where it then connects to the eastern footway along London Road. Brandon Lane is also an advisory cycle route as shown in **Figure 1**.

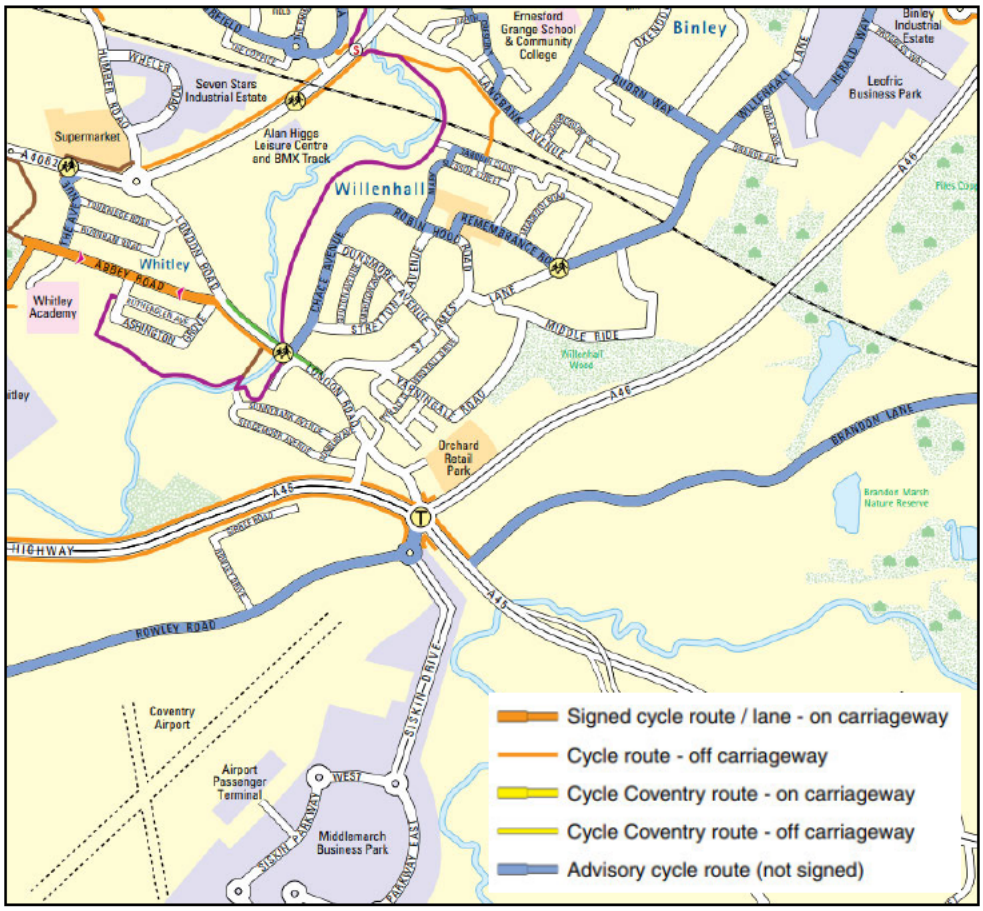
3.2 This deficiency in provision will be improved through the provision of a 3.0m footway/ cycleway along the northern side of Brandon Lane which priorities sustainable transport modes as stated in NPPF Para 15, Point A.

3.3 This will allow direct connection to the eastern footway along London Road which also forms part of an off-carriageway cycle route to Tollbar End Roundabout. There is signalised toucan crossings provided at Tollbar End Roundabout, which facilitate access to bus stops on London Road located north of the Roundabout and Siskin Drive. Signed cycle routes are provided at the Roundabout.

3.4 There are footways provided along both sides of Siskin Drive to the bus stops.

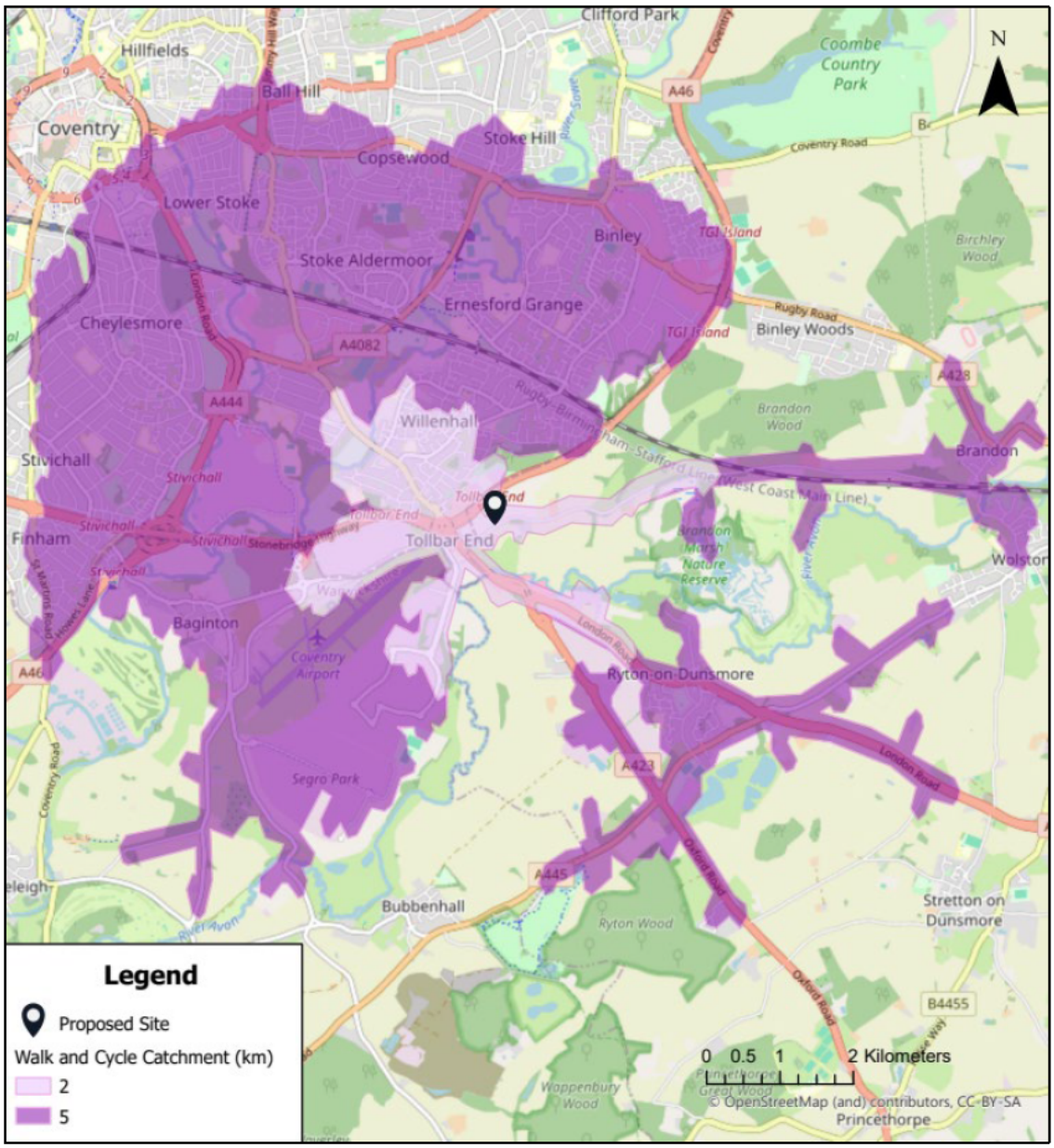
3.5 Public Right of Way (PRoW) W161 is located east of the site and runs across the site's north-easternmost area. PRoW W161 routes from Brandon Lane until the south of the A46 Coventry Eastern Bypass.

Figure 1 – Coventry Cycle Map (Source: Coventry City Council)



3.6 **Figure 2** shows the walk and cycle catchment from the proposed access. This indicates that both Tollbar End and Willenhall in Coventry are located within a 2km walk distance from the site, while south-eastern Coventry and Coventry Airport can be reached within a 5km cycle distance.

Figure 2 – Walk and Cycle Catchment from the Proposed Access



Bus

3.7 The nearest bus stop is located on London Road around 700m from the proposed site access. This stop includes a bus layby and is served by the no. 21A service to Middlemarch Business Park only.

3.8 The no. 21A operates hourly throughout the usual working day, running between Coventry City Centre and Middlemarch Business Park.

3.9 Further bus stops are located on Siskin Drive around 850m from the proposed site access. Both bus stops have a flag and pole arrangement with timetable information and are served by the no. 21A in both directions.

Rail

3.10 Coventry Railway Station is located around 5.6km from the site. The station has a ticket office and machines, car parking (545 spaces including 74 accessible spaces), sheltered cycle parking (around 450 spaces), customer help points, sheltered waiting rooms, CCTV, refreshments, shops induction loop and step free access.

3.11 The No. 21A bus service offers direct access to and from Coventry Station. In Coventry City Centre, passengers board at Greyfriars Road and alight at Mile Lane.

3.12 A summary of these services is presented in **Table 1**.

Table 1 – Railway Service Summary – Coventry

Destination	Journey time	Weekday Frequency
Birmingham International	9 mins (fast)	6 tph
Birmingham New Street	21 mins	6 tph
London Euston	58 mins	5 tph
Leamington Spa	11 mins	2 tph
Reading	1 hr 16 mins	1 tph
Manchester Piccadilly	1 hr 59 mins	1 tph
Bournemouth	2 hrs 46 mins	1 tph

3.13 As stated above the Tollbar End Roundabout pedestrian improvements and proposed 3.0m footway/ cycleway along the northern side of Brandon Lane priorities sustainable transport modes as stated in NPPF Para 15, Point A.

4.0 TRAFFIC IMPACT ISSUES AND EVIDENCE BASE

Forecast Traffic Generation

4.1 The TRICS database has been used to forecast the traffic generation associated with the development proposals which are for 46,452sqm of Classes E (g) (iii), B2 and B8 employment use. To do this, vehicle trip rates were extracted for Land-Use – 02 Employment/ C – Industrial Unit and also for F – Warehousing (Commercial).

4.2 The derived vehicle trip rates and associated trip generation are shown in **Table 2** (Option 2) and **Table 3** (Option 1) and the TRICS outputs are attached as **Appendix C** and **D** respectively. As a worse-case scenario, the associated trip generation is based on the total floor area for Option 1 (46,452sqm).

Table 2 – Forecast Vehicle Trip Generation (Industrial Unit) (42504sqm)

Time Period	Vehicle Trip Rate			HGV Trip Rate			Total Trip Rate		
	ARR	DEP	TOTAL	ARR	DEP	TOTAL	ARR	DEP	TOTAL
AM Peak (08:00-09:00)	0.257	0.016	0.273	0.011	0.01	0.021	0.295	0.035	0.33
PM Peak (17:00-18:00)	0.016	0.231	0.247	0.003	0.008	0.011	0.03	0.261	0.291
12 Hour (07:00-19:00)	1.303	1.277	2.58	0.085	0.085	0.17	1.599	1.579	3.178
	Vehicle Trips			HGV Trips			Total Trips		
	ARR	DEP	TOTAL	ARR	DEP	TOTAL	ARR	DEP	TOTAL
AM Peak (08:00-09:00)	109	7	116	5	4	9	125	15	140
PM Peak (17:00-18:00)	7	98	105	1	3	5	13	111	124
12 Hour (07:00-19:00)	554	543	1097	36	36	72	680	671	1351

Table 3 – Forecast Vehicle Trip Generation (Commercial Warehousing) (46,452sqm)

Time Period	Vehicle Trip Rate			HGV Trip Rate			Total Trip Rate		
	ARR	DEP	TOTAL	ARR	DEP	TOTAL	ARR	DEP	TOTAL
	Industrial Unit								
AM Peak (08:00-09:00)	0.131	0.014	0.145	0.035	0.038	0.073	0.185	0.058	0.243
PM Peak (17:00-18:00)	0.028	0.072	0.1	0.023	0.016	0.039	0.052	0.092	0.144
12 Hour (07:00-19:00)	0.508	0.548	1.056	0.313	0.331	0.644	0.924	0.98	1.904
	Vehicle Trips			HGV Trips			Total Trips		
	ARR	DEP	TOTAL	ARR	DEP	TOTAL	ARR	DEP	TOTAL
AM Peak (08:00-09:00)	61	7	67	16	18	34	86	27	113
PM Peak (17:00-18:00)	13	33	46	11	7	18	24	43	67
12 Hour (07:00-19:00)	236	255	491	145	154	299	429	455	884

4.3 The analysis shows that the proposed development could generate between 67 and 140 two-way vehicle trips in the respective peaks.

Forecast Traffic Distribution and Assignment

4.4 The distribution and assignment of development related traffic has been based on the 2011 Census Journey to Work using the Middle Super Output Area (MSOA) of Rugby 004 in which the site is located.

4.5 This has been assigned to the local road networking using the most direct route (shortest journey time) informed by the calculate travel cost (driving time) analysis function with ArcGIS. The traffic has been distributed to the following routes set out in **Table 4**.

4.6 As a worse-case scenario, the vehicle trips in the respective peaks are based on the associated industrial unit trip generation in **Table 2**.

Table 4 – Traffic Generation

Destination	Percentage	Trips AM Peak Two-Way	Trips PM Peak Two-Way
Brandon Lane East	13%	18	16
Brandon Lane West	87%	122	108
• London Road North	64%	90	79
- A46 Coventry Eastern Bypass	26%	36	32
- A46 Stonebridge Highway	29%	41	36
- London Road	9%	13	11
• London Road South	15%	21	19
• Oxford Road South	8%	11	10

4.7 The development is forecast to generate the majority of vehicle trips towards the Tollbar End Roundabout (64%) with more than half routing on the A46. It can be seen in **Table 4** that the development trips on Brandon Lane East are modest.

4.8 The majority of the traffic will route via the A45 / 46 corridor which as noted above has been subject to significant investment and improvement.

5.0 SUMMARY AND CONCLUSIONS

5.1 This report has considered the suitability of the site for employment development.

5.2 This review confirms that the site is clearly and demonstrably appropriate for employment development. The assessment undertaken has considered site specific impacts of the proposals and this confirms that:

a) Safe and Suitable vehicle access can be achieved to the site via the proposed widening of Brandon Lane and London Road/ Brandon Lane junction.

b) The provision of footway provisions along both sides of Brandon Lane will connect pedestrians and cyclists to the no. 21 bus route.

c) An assessment of the traffic generated by the development proposals has been undertaken and the analysis demonstrates that this is not severe.

d) The allocation of the land would therefore be sound and the development wholly deliverable in an acceptable manner.

APPENDIX A

notes

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South Coventry
Royal Mail
Sorting Office

Pilot trade Park
units 1-14

Orchard Retail Park

A46

Earth bunding & planting

Attenuation Pond

Biodiversity Offset Habitat

Highways access
to underbridge

A46 NORTHBOUND

A46 SOUTHBOUND

Earth bunding & planting

50m Service Area

Two Storey Offices

2no. Level
Entry Doors

30no. Dock Levellers

Car Parking 163no. spaces

UNIT 2

50m Service Area

2no. Level
Entry Doors

15no. Dock Levellers

UNIT 1

Two Storey Offices

Car Parking 70no. spaces

Estate Road

Underground Stormwater
Retention Tank (Highways)

Biodiversity Offset Habitat

0.449 acres / 0.181ha

Tollbar Island

A46

A46

A45 LONDON ROAD

BRANDON LANE

SISKIN DRIVE

MONTGOMERY CLOSE

PUTTRELL CLOSE

OSMA CLOSE

ROYAL CLOSE

LINAKER

0m 100m 200m
Scale

Schedule of Accommodation

All areas are approximate gross internal

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client

Windsor Developments Ltd

project

Land Off Brandon Lane
Coventry CV3 3GU

drawing

Indicative Site Plan
Option 1

scale 1:1250 @ A1 drawn ZI

checked tw date 03/04/2018

no

6000 - 003 A

PRELIMINARY

notes

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Amtico Training & Distribution Center

South Coventry Royal Mail Sorting Office

Pilot trade Park units 1-14

Orchard Retail Park

A46

A46 NORTHBOUND

A46 SOUTHBOUND

Highways access to underbridge

Earth bunding & planting

Earth bunding & planting

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30m Service Area

Car Parking 20no. spaces

Two Storey Offices

4no. Level Entry Doors

UNIT 5

30m Service Area

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Two Storey Offices

Car Parking 20no. spaces

UNIT 3

50m Service Area

2no. Level Entry Doors

8no. Dock Levellers

Two Storey Offices

Car Parking 39no. spaces

Attenuation Pond

Car Parking 46no. spaces

Two Storey Offices

UNIT 4

50m Service Area

2no. Level Entry Doors

10no. Dock Levellers

UNIT 2

50m Service Area

2no. Level Entry Doors

15no. Dock Levellers

Two Storey Offices

Car Parking 70no. spaces

Biodiversity Offset Habitat

Biodiversity Offset Habitat

Estate Road

UNIT 1

30m Service Area

2no. Level Entry Doors

First Floor Offices

Car Parking 9no. spaces

Underground Stormwater Retention Tank (Highways)

0.449 acres / 0.181ha

BRANDON LANE

A45 LONDON ROAD

SISKIN DRIVE

Tollbar Island

A46

A46

UNWIN CLOSE

COLMAN CLOSE

COLMAN CLOSE

PLOVELL CLOSE

PLOVELL CLOSE

MONTGOMERY CLOSE

0m 100m 200m

Scale

Schedule of Accommodation

All areas are approximate gross internal

Unit 1		
Warehouse	1,905 sq.m.	20,500 sq.ft.
Offices First Floor	186 sq.m.	2,000 sq.ft.
Total	2,091 sq.m.	22,500 sq.ft.
Car Spaces	9 Spaces	
Plot Area	0.57 hec.	1.41 acres
Unit 2		
Warehouse	12,821 sq.m.	138,000 sq.ft.
Offices Two Storey	1,115 sqm.	12,000 sq.ft.
Total	13,936 sq.m.	150,000 sq.ft.
Car Spaces	70 Spaces	
Plot Area	2.58 hec.	6.38 acres
Unit 3		
Warehouse	7,432 sq.m.	80,000 sq.ft.
Offices Two Storey	743 sqm.	8,000 sq.ft.
Total	8,175 sq.m.	88,000 sq.ft.
Car Spaces	39 Spaces	
Plot Area	1.72 hec.	4.26 acres
Unit 4		
Warehouse	8,454 sq.m.	91,000 sq.ft.
Offices Two Storey	836 sqm.	9,000 sq.ft.
Total	9,290 sq.m.	100,000 sq.ft.
Car Spaces	46 Spaces	
Plot Area	1.89 hec.	4.67 acres
Unit 5		
Warehouse	4,645 sq.m.	50,000 sq.ft.
Offices Two Storey	465 sqm.	5,000 sq.ft.
Total	5,110 sq.m.	55,000 sq.ft.
Car Spaces	26 Spaces	
Plot Area	1.19 hec.	2.93 acres
Unit 6		
Warehouse	3,530 sq.m.	38,000 sq.ft.
Offices Two Storey	372 sqm.	4,000 sq.ft.
Total	3,902 sq.m.	42,000 sq.ft.
Car Spaces	20 Spaces	
Plot Area	0.88 hec.	2.17 acres
Total Development	42,504 sq.m.	457,500 sq.ft.
Total Site Area	16.07 Ha	39.71 acres

no. date revision by

aja architects

aja architects llp
1170 Elliott Court
Herald Avenue
Coventry Business Park
COVENTRY CV5 6UB

T: 024 7625 3200
F: 024 7625 3210
E: aja@aja-architects.com
W: www.aja-architects.com

aja architects llp is a limited liability partnership registered in England No. OC326721

client

Windsor Developments Ltd

project

Land Off Brandon Lane
Coventry CV3 3GU

drawing

Indicative Site Plan
Option 2

scale 1:1250 @ A1 drawn Zi

checked TW date 03/04/2018

no

6000 - 004 A

PRELIMINARY

APPENDIX B

721a

El Sub Sta

7

3.0159
1.0000

7.3000
2.0000

Highway boundary extents

7.3m access
20m radii
3.0m footway/cycleway
with 50mph taper

End

Redline

The Fieldings

Grange Bungalow

Drain

Brandon lane widened
to 7.3m /1.0m verge/
3.0m footway / cycleway
on northern side with
2.0m on southern

1/1000@A3

Based upon the ORDNANCE SURVEY MAPS with the permission of
THE CONTROLLER OF HER MAJESTY'S STATIONERY OFFICE
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© David Tucker Associates

REV	DESCRIPTION	DRAWN	INITIALS	DATE

DTA
Transport Planning Consultants

Forester House, Doctors Lane,
Henley in Arden,
Warwickshire B95 5AW
Tel: +44(0)1564 793598
Fax: +44(0)1564 793983
www.dtatransportation.co.uk

JOB TITLE	CLIENT
Brandon Lane, Coventry	Windsor Developments Ltd

DRAWING TITLE

Potential Brandon Lane Improvements

SCALE	DRAWN BY	DATE	DRAWING No	REVISION
1/500@A3	BP	25-07-25	26002-01-3	A

APPENDIX C

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use: 02 - EMPLOYMENT

Category: C - INDUSTRIAL UNIT

Selected Vehicle Type: Total Vehicles

Selected regions and areas:

02	**SOUTH EAST**		
	HF	HERTFORDSHIRE	1 day
	WS	WEST SUSSEX	1 day
06	**WEST MIDLANDS**		
	WK	WARWICKSHIRE	1 day

This section displays the number of survey days per TRICS® sub-region in the selected set.

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Primary Filtering Selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	GFA
Actual Range:	9115 to 67459 (units:sqm)
Range Selected by User:	9000 to 100000 (units:sqm)
Parking Spaces Range:	4 - 1378

Public Transport Provision:

Selection by:	All Surveys Included
Date Range:	01/01/17 to 03/06/25

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Wednesday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	3
Direction ATC Count	0

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines

Selected Locations:

Edge of Town	2 days
Neighbourhood Centre	1 days

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Industrial Zone	2 days
Village	1 days

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicle Counts:

Servicing vehicles Included	3 days

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Secondary Filtering Selection:

Use Class:

Not Known	3 surveys

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

70 - 1641

Population within 1 mile:

15,001 to 20,000	1 surveys
5,001 to 10,000	2 surveys

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

125,001 to 250,000	1 surveys
75,001 to 100,000	2 surveys

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	1 surveys
1.1 to 1.5	2 surveys

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

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Petrol filling station:

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

No	2 surveys
Yes	1 surveys

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	3 surveys

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

COVID-19 Restrictions:

No

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1	**HF-02-C-02**	**FRESH PRODUCE**	**HERTFORDSHIRE**

COCKERELL CLOSE
STEVENAGE
Edge of Town
Industrial Zone
Gross floor area: 17834.00 sqm
Survey date: Wednesday 08/11/2023 Survey Type: Manual

2	**WK-02-C-01**	**MACHINE ENGINEERING**	**WARWICKSHIRE**

CASTLE MOUND WAY
RUGBY
Edge of Town
Industrial Zone
Gross floor area: 9216.00 sqm
Survey date: Wednesday 10/11/2021 Survey Type: Manual

3	**WS-02-C-04**	**ROLLS-ROYCE HQ & PLANT**	**WEST SUSSEX**

STANE STREET
NEAR CHICHESTER
WESTHAMPNETT
Neighbourhood Centre
Village
Gross floor area: 67459.00 sqm
Survey date: Wednesday 29/06/2022 Survey Type: Manual

DESELECTED SURVEYS

Site Ref	Survey Date	Reason for Deselection
DN-02-C-01|28-09-2020	28-09-2020	Covid-19 Restrictions
MG-02-C-03|12-10-2021	12-10-2021	Covid-19 Restrictions
MG-02-C-04|28-09-2023	28-09-2023	Republic of Ireland

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TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

Total Vehicles

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. GFA	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00	3	31503	0.453	0.015	0.468
06:00-07:00	3	31503	0.294	0.073	0.367
07:00-08:00	3	31503	0.295	0.035	0.330
08:00-09:00	3	31503	0.177	0.042	0.219
09:00-10:00	3	31503	0.084	0.043	0.127
10:00-11:00	3	31503	0.049	0.039	0.088
11:00-12:00	3	31503	0.037	0.037	0.074
12:00-13:00	3	31503	0.050	0.056	0.106
13:00-14:00	3	31503	0.095	0.072	0.167
14:00-15:00	3	31503	0.324	0.471	0.795
15:00-16:00	3	31503	0.122	0.272	0.394
16:00-17:00	3	31503	0.030	0.261	0.291
17:00-18:00	3	31503	0.042	0.178	0.220
18:00-19:00	3	31503	0.060	0.112	0.172
19:00-20:00	2	13525	0.000	0.033	0.033
20:00-21:00	2	13525	0.000	0.011	0.011
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			2.112	1.750	3.862

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	9000 - 100000 (units: sqm)
Survey date date range:	10/11/2021 - 08/11/2023
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	4
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

OGVs

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. GFA	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00	3	31503	0.005	0.000	0.005
06:00-07:00	3	31503	0.008	0.007	0.015
07:00-08:00	3	31503	0.011	0.010	0.021
08:00-09:00	3	31503	0.011	0.011	0.022
09:00-10:00	3	31503	0.007	0.006	0.013
10:00-11:00	3	31503	0.006	0.008	0.014
11:00-12:00	3	31503	0.007	0.004	0.011
12:00-13:00	3	31503	0.004	0.010	0.014
13:00-14:00	3	31503	0.010	0.007	0.017
14:00-15:00	3	31503	0.000	0.005	0.005
15:00-16:00	3	31503	0.010	0.004	0.014
16:00-17:00	3	31503	0.003	0.008	0.011
17:00-18:00	3	31503	0.008	0.005	0.013
18:00-19:00	3	31503	0.006	0.006	0.012
19:00-20:00	2	13525	0.000	0.000	0.000
20:00-21:00	2	13525	0.000	0.000	0.000
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			0.096	0.091	0.187

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Parameter Summary:

Trip rate parameter range selected:	9000 - 100000 (units: sqm)
Survey date date range:	10/11/2021 - 08/11/2023
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	4
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

Cars

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. GFA	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00	**3**	**31503**	**0.409**	**0.013**	**0.422**
06:00-07:00	**3**	**31503**	**0.267**	**0.057**	**0.324**
07:00-08:00	**3**	**31503**	**0.257**	**0.016**	**0.273**
08:00-09:00	**3**	**31503**	**0.134**	**0.013**	**0.147**
09:00-10:00	**3**	**31503**	**0.062**	**0.019**	**0.081**
10:00-11:00	**3**	**31503**	**0.026**	**0.015**	**0.041**
11:00-12:00	**3**	**31503**	**0.020**	**0.015**	**0.035**
12:00-13:00	**3**	**31503**	**0.031**	**0.032**	**0.063**
13:00-14:00	**3**	**31503**	**0.074**	**0.053**	**0.127**
14:00-15:00	**3**	**31503**	**0.290**	**0.433**	**0.723**
15:00-16:00	**3**	**31503**	**0.098**	**0.236**	**0.334**
16:00-17:00	**3**	**31503**	**0.016**	**0.231**	**0.247**
17:00-18:00	**3**	**31503**	**0.028**	**0.157**	**0.185**
18:00-19:00	**3**	**31503**	**0.043**	**0.091**	**0.134**
19:00-20:00	**2**	**13525**	**0.000**	**0.033**	**0.033**
20:00-21:00	**2**	**13525**	**0.000**	**0.011**	**0.011**
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			**1.755**	**1.425**	**3.180**

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	9000 - 100000 (units: sqm)
Survey date date range:	10/11/2021 - 08/11/2023
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	4
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

LGVs

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. GFA	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00	**3**	**31503**	**0.018**	**0.000**	**0.018**
06:00-07:00	**3**	**31503**	**0.007**	**0.004**	**0.011**
07:00-08:00	**3**	**31503**	**0.021**	**0.007**	**0.028**
08:00-09:00	**3**	**31503**	**0.029**	**0.016**	**0.045**
09:00-10:00	**3**	**31503**	**0.013**	**0.017**	**0.030**
10:00-11:00	**3**	**31503**	**0.015**	**0.015**	**0.030**
11:00-12:00	**3**	**31503**	**0.008**	**0.017**	**0.025**
12:00-13:00	**3**	**31503**	**0.013**	**0.013**	**0.026**
13:00-14:00	**3**	**31503**	**0.008**	**0.012**	**0.020**
14:00-15:00	**3**	**31503**	**0.013**	**0.016**	**0.029**
15:00-16:00	**3**	**31503**	**0.011**	**0.020**	**0.031**
16:00-17:00	**3**	**31503**	**0.008**	**0.016**	**0.024**
17:00-18:00	**3**	**31503**	**0.002**	**0.006**	**0.008**
18:00-19:00	**3**	**31503**	**0.008**	**0.011**	**0.019**
19:00-20:00	**2**	**13525**	**0.000**	**0.000**	**0.000**
20:00-21:00	**2**	**13525**	**0.000**	**0.000**	**0.000**
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			**0.174**	**0.170**	**0.344**

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	9000 - 100000 (units: sqm)
Survey date date range:	10/11/2021 - 08/11/2023
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	4
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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APPENDIX D

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use: 02 - EMPLOYMENT

Category: F - WAREHOUSING (COMMERCIAL)

Selected Vehicle Type: Total Vehicles

Selected regions and areas:

03	**SOUTH WEST**		
	DV	DEVON	1 day
	GS	GLOUCESTERSHIRE	1 day
	SG	SOUTH GLOUCESTERSHIRE	1 day
05	**EAST MIDLANDS**		
	NN	NORTH NORTHAMPTONSHIRE	1 day
07	**YORKSHIRE & NORTH LINCOLNSHIRE**		
	RI	EAST RIDING OF YORKSHIRE	1 day

This section displays the number of survey days per TRICS® sub-region in the selected set.

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Primary Filtering Selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	GFA
Actual Range:	18790 to 54445 (units:sqm)
Range Selected by User:	15000 to 100000 (units:sqm)
Parking Spaces Range:	4 - 1192

Public Transport Provision:

Selection by:	All Surveys Included
Date Range:	05/01/17 to 24/06/25

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	2 days
Thursday	2 days
Wednesday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	5
Direction ATC Count	0

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines

Selected Locations:

Edge of Town	3 days
Free Standing	1 days
Neighbourhood Centre	1 days

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Commercial Zone	1 days
Industrial Zone	2 days
Out of Town	1 days
Village	1 days

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicle Counts:

Servicing vehicles Excluded	1 days
Servicing vehicles Included	2 days
Servicing vehicles Unknown	2 days

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Secondary Filtering Selection:

Use Class:

B8	5 surveys

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

0 - 2100

Population within 1 mile:

1,001 to 5,000	4 surveys
10,001 to 15,000	1 surveys

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

100,001 to 125,000	1 surveys
125,001 to 250,000	2 surveys
50,001 to 75,000	1 surveys
75,001 to 100,000	1 surveys

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	1 surveys
1.1 to 1.5	4 surveys

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

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Petrol filling station:

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

No	5 surveys

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	5 surveys

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

COVID-19 Restrictions:

No

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1	**DV-02-F-03**	**LIDL DISTRIBUTION CENTRE**	**DEVON**

CHILLPARK BRAKE
NEAR EXETER
CLYST HONITON
Free Standing
Out of Town
Gross floor area: 49081 sqm
Survey date:

Survey Type: Manual

2	**GS-02-F-01**	**LOGISTICS WAREHOUSE**	**GLOUCESTERSHIRE**

GOLF CLUB LANE
NEAR GLOUCESTER
BROCKWORTH
Edge of Town
Commercial Zone
Gross floor area: 24500 sqm
Survey date: Wednesday 03/05/2023

Survey Type: Manual

3	**NN-02-F-01**	**WAREHOUSING & DISTRIBUTION CENTRE**	**NORTH NORTHAMPTONSHIRE**

HALLEY ROAD
CORBY
Edge of Town
Industrial Zone
Gross floor area: 18790 sqm
Survey date: Thursday 19/10/2023

Survey Type: Manual

4	**RI-02-F-01**	**WAREHOUSING & DISTRIBUTION**	**EAST RIDING OF YORKSHIRE**

JACKSON WAY
NEAR NORTH FERRIBY
MELTON
Neighbourhood Centre
Village
Gross floor area: 25084 sqm
Survey date:

Survey Type: Manual

5	**SG-02-F-01**	**WAREHOUSING & DISTRIBUTION**	**SOUTH GLOUCESTERSHIRE**

PALMER AVENUE
NEAR BRISTOL
SEVERN BEACH
Edge of Town
Industrial Zone
Gross floor area: 54445 sqm
Survey date: Thursday 17/10/2024

Survey Type: Manual

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TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)

Total Vehicles

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. GFA	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00	**5**	**34380**	**0.127**	**0.041**	**0.168**
06:00-07:00	**5**	**34380**	**0.076**	**0.065**	**0.141**
07:00-08:00	**5**	**34380**	**0.136**	**0.063**	**0.199**
08:00-09:00	**5**	**34380**	**0.185**	**0.058**	**0.243**
09:00-10:00	**5**	**34380**	**0.083**	**0.074**	**0.157**
10:00-11:00	**5**	**34380**	**0.078**	**0.053**	**0.131**
11:00-12:00	**5**	**34380**	**0.055**	**0.057**	**0.112**
12:00-13:00	**5**	**34380**	**0.067**	**0.076**	**0.143**
13:00-14:00	**5**	**34380**	**0.099**	**0.096**	**0.195**
14:00-15:00	**5**	**34380**	**0.048**	**0.134**	**0.182**
15:00-16:00	**5**	**34380**	**0.045**	**0.080**	**0.125**
16:00-17:00	**5**	**34380**	**0.042**	**0.148**	**0.190**
17:00-18:00	**5**	**34380**	**0.052**	**0.092**	**0.144**
18:00-19:00	**5**	**34380**	**0.034**	**0.049**	**0.083**
19:00-20:00	**5**	**34380**	**0.033**	**0.045**	**0.078**
20:00-21:00	**5**	**34380**	**0.042**	**0.039**	**0.081**
21:00-22:00	**1**	**18790**	**0.016**	**0.059**	**0.075**
22:00-23:00	**1**	**18790**	**0.005**	**0.043**	**0.048**
23:00-00:00	**1**	**18790**	**0.005**	**0.005**	**0.010**
Total Rates:			**1.228**	**1.277**	**2.505**

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	15000 - 100000 (units: sqm)
Survey date date range:	22/11/2021 - 28/04/2025
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)

OGVs

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. GFA	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00	**5**	**34380**	**0.024**	**0.019**	**0.043**
06:00-07:00	**5**	**34380**	**0.031**	**0.025**	**0.056**
07:00-08:00	**5**	**34380**	**0.035**	**0.042**	**0.077**
08:00-09:00	**5**	**34380**	**0.035**	**0.038**	**0.073**
09:00-10:00	**5**	**34380**	**0.034**	**0.047**	**0.081**
10:00-11:00	**5**	**34380**	**0.030**	**0.029**	**0.059**
11:00-12:00	**5**	**34380**	**0.027**	**0.029**	**0.056**
12:00-13:00	**5**	**34380**	**0.024**	**0.034**	**0.058**
13:00-14:00	**5**	**34380**	**0.021**	**0.024**	**0.045**
14:00-15:00	**5**	**34380**	**0.022**	**0.022**	**0.044**
15:00-16:00	**5**	**34380**	**0.024**	**0.017**	**0.041**
16:00-17:00	**5**	**34380**	**0.023**	**0.018**	**0.041**
17:00-18:00	**5**	**34380**	**0.023**	**0.016**	**0.039**
18:00-19:00	**5**	**34380**	**0.015**	**0.015**	**0.030**
19:00-20:00	**5**	**34380**	**0.015**	**0.015**	**0.030**
20:00-21:00	**5**	**34380**	**0.009**	**0.010**	**0.019**
21:00-22:00	**1**	**18790**	**0.000**	**0.000**	**0.000**
22:00-23:00	**1**	**18790**	**0.000**	**0.000**	**0.000**
23:00-00:00	**1**	**18790**	**0.000**	**0.000**	**0.000**
Total Rates:			**0.392**	**0.400**	**0.792**

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter Summary:

Trip rate parameter range selected:	15000 - 100000 (units: sqm)
Survey date date range:	22/11/2021 - 28/04/2025
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)

Cars

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. GFA	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00	**5**	**34380**	**0.095**	**0.022**	**0.117**
06:00-07:00	**5**	**34380**	**0.041**	**0.034**	**0.075**
07:00-08:00	**5**	**34380**	**0.091**	**0.015**	**0.106**
08:00-09:00	**5**	**34380**	**0.131**	**0.014**	**0.145**
09:00-10:00	**5**	**34380**	**0.042**	**0.018**	**0.060**
10:00-11:00	**5**	**34380**	**0.034**	**0.012**	**0.046**
11:00-12:00	**5**	**34380**	**0.020**	**0.020**	**0.040**
12:00-13:00	**5**	**34380**	**0.032**	**0.030**	**0.062**
13:00-14:00	**5**	**34380**	**0.064**	**0.058**	**0.122**
14:00-15:00	**5**	**34380**	**0.017**	**0.098**	**0.115**
15:00-16:00	**5**	**34380**	**0.015**	**0.054**	**0.069**
16:00-17:00	**5**	**34380**	**0.016**	**0.124**	**0.140**
17:00-18:00	**5**	**34380**	**0.028**	**0.072**	**0.100**
18:00-19:00	**5**	**34380**	**0.018**	**0.033**	**0.051**
19:00-20:00	**5**	**34380**	**0.017**	**0.027**	**0.044**
20:00-21:00	**5**	**34380**	**0.032**	**0.027**	**0.059**
21:00-22:00	**1**	**18790**	**0.016**	**0.059**	**0.075**
22:00-23:00	**1**	**18790**	**0.005**	**0.043**	**0.048**
23:00-00:00	**1**	**18790**	**0.005**	**0.005**	**0.010**
Total Rates:			**0.719**	**0.765**	**1.484**

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	15000 - 100000 (units: sqm)
Survey date date range:	22/11/2021 - 28/04/2025
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)

LGVs

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. GFA	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00	**5**	**34380**	**0.004**	**0.000**	**0.004**
06:00-07:00	**5**	**34380**	**0.002**	**0.002**	**0.004**
07:00-08:00	**5**	**34380**	**0.006**	**0.005**	**0.011**
08:00-09:00	**5**	**34380**	**0.017**	**0.006**	**0.023**
09:00-10:00	**5**	**34380**	**0.006**	**0.009**	**0.015**
10:00-11:00	**5**	**34380**	**0.012**	**0.011**	**0.023**
11:00-12:00	**5**	**34380**	**0.007**	**0.008**	**0.015**
12:00-13:00	**5**	**34380**	**0.008**	**0.012**	**0.020**
13:00-14:00	**5**	**34380**	**0.009**	**0.010**	**0.019**
14:00-15:00	**5**	**34380**	**0.008**	**0.008**	**0.016**
15:00-16:00	**5**	**34380**	**0.005**	**0.009**	**0.014**
16:00-17:00	**5**	**34380**	**0.003**	**0.005**	**0.008**
17:00-18:00	**5**	**34380**	**0.001**	**0.002**	**0.003**
18:00-19:00	**5**	**34380**	**0.001**	**0.002**	**0.003**
19:00-20:00	**5**	**34380**	**0.000**	**0.002**	**0.002**
20:00-21:00	**5**	**34380**	**0.000**	**0.001**	**0.001**
21:00-22:00	**1**	**18790**	**0.000**	**0.000**	**0.000**
22:00-23:00	**1**	**18790**	**0.000**	**0.000**	**0.000**
23:00-00:00	**1**	**18790**	**0.000**	**0.000**	**0.000**
Total Rates:			**0.089**	**0.092**	**0.181**

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	15000 - 100000 (units: sqm)
Survey date date range:	22/11/2021 - 28/04/2025
Number of weekdays (Monday-Friday):	5
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

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Appendix 5 – Response from Neil Holly, Development Strategy Manager, Rugby Borough Council

"We are not willing to hold a meeting at this stage. We are a small team and we receive a lot of requests from landowners, developers and land promoters for meetings. We therefore need to prioritise those meetings on sites that we consider have a reasonable prospect of allocation in the local plan.

There are a number of constraints that mean that I do not think the Brandon Lane site has reasonable prospects. In particular, this is a sensitive area of Green Belt, there would be traffic challenges, and the site was until recently largely wooded. In calculating biodiversity net gain site clearance after 30 January 2020 is disregarded. Therefore, the BNG requirement would be assessed based on the January 2020 or pre-clearance, biodiversity value at which point both aerial photography and the Warwickshire phase 1 habitat survey demonstrate that the site was deciduous woodland. In light of that, I don't think there is a reasonable prospect of 10% BNG being able to be demonstrated for a viable development of the site when assessed against the pre-clearance biodiversity value."

Regards,

Neil Holly

Representation Form for Local Plans

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

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

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

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

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
	**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*	
Title	Mr	Mr
First Name	Gary	Mike
Last Name	Scott	Straw
Job Title (where relevant)		Managing Director
Organisation (where relevant)	Windsor Developments Ltd	MSP+D Ltd
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		[redacted]
Post Code		[redacted]
Telephone Number		

E-mail Address (where relevant)		mike.straw@btinternet.com

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	1.35-1.37 3.6	Local Plan Policy	S3 (A) ii and B. S7 Employment Allocations E2 Employment Development	Policies Map	Employment allocations
Site ID					

4. Do you consider the Local Plan:

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

This representation to the Regulation 19 Draft of the Rugby Borough Plan is submitted on behalf of Windsor Developments Ltd (**WDL**) owners of the Brandon Lane site as shown in Appendix 1.

The site's locational context in terms of surrounding land uses and access is given in Appendix 2.

In summary, WDL consider that in order to make the Regulation 19 Draft Rugby Borough Plan sound the submitted plan requires the following main modifications:

- Removal of the Brandon Lane site from the Green Belt from the plan's proposals map and so Policy S5 (B).
- A site allocation of the Brandon Lane site for employment use in the proposals map and therefore amend the plan's proposals map green belt boundaries and employment site allocations and so modify submitted Policies S3, S7 and E2.

For details as to why we consider that the Local Plan is not sound in relation to employment policies S3, S7 and E2 see separately attached word document and also Appendix 3(a) and(b) which gives illustrative site layout for employment uses at the Brandon Lane site and Appendix 4 -Transport Note and Appendix 5.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate

is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The modifications sought are because the plan policies S3, S7 and Policy E2(Part E) are not sound for reasons given in Section 5 attached a separate word document.

Modifications to Policies S3 and S7 and Employment Site Allocation Annex.

Policy S3 – Strategic Employment Land

Modification to the table under the policy heading:

"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	Approximate square metres of floorspace 2025 2042
New allocations under Policy S7 Land at Brandon Lane	 46,000

Policy S7 – Employment Allocations

As highlighted in paragraphs 3.15-3.16 Policy S7 places undue reliance on the development of a limited number of very large sites (5 sites as listed) which as noted in the submissions in respect of draft Policy S3 may be impacted adversely by delays and viability issues. This contains no contingency if such delays occur. In turn, this may impact negatively on the overall delivery of employment land across the plan period to 2042.

The plan therefore needs to be modified to include a range of smaller sites including

Site Name	Floorspace
Land at Brandon Lane	46,000 sq m

Policy S7 Employment Site Allocations - Annex

Inclusion as an Employment site Anex - Land at Brandon Lane – Illustrative Site Options Plans 1 and 2 as given in Appendix 3 to this representation.

4.4 **Modifications to Policy E2- Employment Development**

Modification to Part E of Policy to an in new criteria

v." where there is evidence that during the plan period the employment allocations given in Policy 7 are unable deliver the plan's identified employment needs."

(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	**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:

Because as for reasons set out in this representation the Barndon Lane site should be allocated for employment use and also removed from the Green Belt because there are exceptional circumstances for removal of the site from the Green Belt and allocated for employment land uses.

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 applicable.

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

The Rugby Borough Council Privacy Notice for Development Strategy is available here:
https://www.rugby.gov.uk/w/privacy#development-strategy
The Planning Inspectorate's privacy notice can be accessed here:
https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices

3.8 Guidance in the current NPPF (2024) emphasises that the *"preparation and review of all policies should be underpinned by relevant and up to date evidence".* The proposed submitted local plan fails to carry out this guidance.

3.9 In summary, there are number of areas of concern that mean the figures are inadequate to provide employment land across the whole plan period.

1) The projected figures and the assumptions used to determine the overall level of employment land provision are out of date and fail to fully consider all factors that will influence the levels of need up to 2045.

2) Provision of the strategic land elements of overall employment land rely heavily on several of the large, allocated employment and mixed-use sites which depend on the provision of large significant infrastructure with complex delivery challenges and heavy infrastructure costs. These are likely to have a high degree of risk in the timing of delivery and is likely to impact on their ability to meet the employment need in the plan period.

3) The policy provision fails to take proper account of recent and current changing market trends and requirements for different types of employment accommodation. Consequently, the policy fails to provide employment land in the correct locations where employment needs and market demand exists.

3.10 The proposed level of land provision ignores a key part of the plan area on the fringes of the Coventry urban area related to the designated Coventry and Warwickshire Investment Zone (CWIZ). This results in overall provision falling short of what is necessary to meet overall levels of need to 2045 and failing to provide opportunities in the right places. The Investment Zone will, by definition, provide a major catalyst for growth across this whole part of the sub region.

3.11 It is therefore considered that the Council's evidence base is not justified because of the following:

Representation Form for Local Plans

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

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

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

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

Part A

	1. Personal Details*	2. Agent's Details (if applicable)
	**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*	
Title	Mr	Mr
First Name	Gary	Mike
Last Name	Scott	Straw
Job Title (where relevant)		Managing Director
Organisation (where relevant)	Windsor Developments Ltd	MSP+D Ltd
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		[redacted]
Post Code		[redacted]
Telephone Number		[redacted]

E-mail Address (where relevant)		mike.straw@btinternet.com

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	1.33	Local Plan Policy	S5(B)	Policies Map	Yes
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	•
(2) is Sound	Yes		No	•
(3) complies with the Duty to co-operate	Yes		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.
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This representation to the Regulation 19 Draft of the Rugby Borough Plan is submitted on behalf of Windsor Developments Ltd (**WDL**) owners of the Brandon Lane site as shown in Appendix 1.

The site's locational context in terms of surrounding land uses and access is given in Appendix 2.

In summary, WDL consider that in order to make the Regulation 19 Draft Rugby Borough Plan sound the submitted plan requires the following main modifications:

- Removal of the Brandon Lane site from the Green Belt from the plan's proposals map and so Policy S5 (B).
- A site allocation of the Brandon Lane site for employment use in the proposals map and therefore amend the plan's proposals map green belt boundaries and employment site allocations and so modify submitted Policies S3, S7 and E2.

2.Representation to make changes to the plan's Green Belt Boundary

Green Belt/Grey Belt Assessment

2.1 Section 13 of the National Planning Policy Framework gives national policy relating to the Green Belt.

2.2 Paragraphs 142-160 highlight that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and permanence.

2.3 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans

2.4 Paragraph 146 states that exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review green belt boundaries in accordance with the policies of the framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes(taken together) of the remaining Green belt, when considered across the area of the plan.

2.5 Before concluding that exceptional circumstances exist to justify changes to green belt boundaries the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development and so whether the strategy (a) makes as much use as possible of suitable brownfield sites and underutilised land (b) optimises the density of development in town and city centres an other locations well served by public transport and (c) informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need for development through statements of common ground.

2.6 Paragraph 148 states that *"Where it is necessary to release Green Belt Land for development plans should give priority to previously developed and land, then consider grey belt which is not previously developed and then other Green belt locations. However, when drawing up or reviewing green belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110-115 of this framework.*

2.7 Paragraph 155 states that the development of homes, commercial and other development i the Green Belt should also not be regarded as inappropriate development where all of the following apply

a. the development would utilise grey belt land and would not fundamentally undermine th purposes (taken together) of the remaining Green Belt across the area of the plan

b, there is a demonstrable unmet need for the type of development proposed across the area of the plan

c. the development would be in a sustainable location with particular reference to paragraphs 110-115 of the Framework

d. where applicable the development meets the "Golden Rules" requirements of paragraphs 156-157 of the framework.

2.8 Guidance relating to assessing whether sites within the green belt land should be removed from the green belt because the site is "grey belt" land is given in paragraph 004 Reference ID 64-004-20250225. This states that where it is assessed the Green Belt area does not

strongly contribute to Green Belt criteria a, b and d then the site can be identified as Grey Belt subject to footnote 7 of the NPPF.

2.9 Table 1 below gives our assessment as to why the Brandon Lane site is a Grey Belt site when assessed against these criteria and that it our opinion the site is not an "irreplaceable habitat" or designated as habitat site.

Grey Belt Criteria	**Purpose/Contribution as given in Paragraph 004 Reference ID 64-004-202500225**	**Assessment of purpose/contribution of Brandon Lane site**
Purpose A- to check the unrestricted sprawl of large built-up areas.	Strong Areas that contribute strongly likely to be free of existing development,and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features -be adjacent or near to a large built-up area -if developed, result in an incongruous pattern of development (such as an extended "finger" of development into the green belt Moderate Assessment areas that contribute moderately are likely to be adjacent or near to large built-up area, but include one or more features that weaken the land's contribution to this purpose a, such as (but not limited to): -having physical feature(s) in reasonable proximity that could restrict and contain development -be partially enclosed by existing development such that new development would not result in an incongruous pattern of development	**Moderate** There are existing residential properties immediately adjacent to the eastern, western and southern parts of the Brandon Lane site. To the north the site is the A46 and the Airport Retail Park, which could be accessed by foot/cycle to the site via the existing underpass – although currently blocked to prevent public access. There are existing employment sites within the green belt immediately to the south-west of the site at Prologis Park, Ryton. The site is subject to other urbanising influences: • To the east of the site - the Coventry Investment Zone is being developed for major employment uses and major employment land use allocations are proposed to the south and west in the Regulation 19 plan requiring the removal of extensive tranches of green belt land. Brandon Lane to the south of the site and its hedgerow will

	-contain existing development - being subject to other urbanising influences Weak or None Assessment areas that make only a weak or no contribution are likely to include those that: -are not adjacent to or near to large built-up area - are adjacent to or near to a large built-up area but containing or being largely enclosed by significant existing development	restrict and contain development to the south.
Grey Belt Criteria	**Purpose/Contribution as given in Paragraph 004 Reference ID 64-004-202500225**	**Assessment of purpose/contribution of Brandon Lane site**
Purpose B – to prevent neighbouring towns merging into one another	Strong Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: -forming a substantial part of a gap between towns -the development of which would be likely to result in the loss of visual separation of towns. Moderate Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to) -forming a small part of the gap between towns -being able to be developed without the loss of visual separation between towns. This could be (but is not	**None** The Brandon Lane site does not form part of a gap between towns.

	limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserver visual separation. Weak or none Assessment areas that contribute weakly are likely to include those that -do not form part of a gap between towns, or -form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation	
Grey Belt Criteria	**Purpose/Contribution as given in Paragraph 004 Reference ID 64-004-202500225**	**Assessment of purpose/contribution of Brandon Lane site**
Purpose D – to preserve the setting and special character of historic towns	Strong Assessment areas that contribute strongly are likely to be free of existing development and to include all of the following features -form part of the setting of the historic town -make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being adjacent to, or of significant visual importance to the historic aspects of the town. Moderate Assessment areas that preform moderately are likely to form part of the setting and /or contribute to the special character of a historic town but include one or more features that weaken their	**None** The Brandon Lane site does not form part of the setting and special character of a historic town.

	contribution to this purpose, such as (but not limited to) -being separated to some extent from historic aspects of the town by existing development or topography -containing existing development -not having an important visual, physical, or experiental relationship to the historic aspects of the town Weak or None Assessment areas that make no or only a weak contribution are likely to include those that -do not form part of the setting of a historic town -have no visual, physical, or experiental connection to the historic aspects of the town.	

Promotion of sustainable forms of development.

2.10 The allocation of the Brandon Road site as Grey Belt is also supported by paragraph 148 of the NPFF where development needs to promote sustainable forms of development as highlighted in paragraphs 110 -115 of the framework. This is because:

(A) Appendix 2 shows the site's strategic and proximity to:

- the strategic road network and Tollbar junction – serving the A45 London Road and A46 Coventry Eastern bypass to Coventry and Coventry City Centre and the adjacent existing major manufacturing and storage/distribution/R&D employment sites to the southwest and east of the Coventry urban fringe;
- other major manufacturing and logistical developments now being developed adjacent to the site as part of the Gigapark/Coventry investment Zone.
- established bus services serving the Coventry/Warwick Gigapark – /Middlemarch Business Park/Rugby including routes 13, 21A, 85/85A and 85B and 86 Public transport services to Coventry City Centre/Railway Station.

(B) Appendix 4 – transportation assessment - which gives evidence that:

- the two illustrative options as given in Appendix 3(a) and (b) for potential employment generating developments can meet on-site parking standards and servicing access requirements.
- vehicular movements associated with the two possible employment development options can be safely accessed to the strategic road network and will not cause any significant traffic impact upon the strategic and local road network.

(C) The Brandon Lane site meets employment needs and site locational requirements as identified by the Council's own submitted evidence Topic Paper Development Needs- December 2025 – Document 6:

- after existing committed supply requirement for new industrial land supply is for 529,882 (310,711m2 large sites + 219,170.6 small sites) or 143.56ha (88.77ha + 54.79ha) in total. – paragraphs 3.27- 3.32.
- there is no clear basis to identify separate 'local' and 'strategic' need requirements in local plan policy. This is not justified, given the overlap between these categories – strategic sites being above 25 hectares – paragraph 3.47.
- "strategic sites" should meet the following criteria:
    - Good connections with the strategic highway network (for road)
    - Sufficiently large and flexible - ideally sites would be a minimum of 25ha and readily over 50ha
    - Is or can be served from an electricity supply grid with sufficient capacity.
    - Is accessible to labour and includes a clear sustainable transport solution for the local road network.
    - Is located away from incompatible land-uses
    - The ability to deliver high-bay warehousing

Green Belt Boundary Assessment - Conclusions

2.11 Development of the Brandon Road site for employment uses is not inappropriate development because:

- Removal of the site's green belt designation is supported by paragraph 155 – a, b and c of the NPPF because the site is grey belt as evidenced by Table 1 and also evidence that:
    - the site's strategic location will promote sustainable development and as required by NPPF paragraph 148 employment development – see paragraph 2.10. – points A &B.
    - the site – although less than 25 hectares – is nevertheless a "strategic site" as specified by the Council's own definition of strategic sites given in Document 1 – this is because the site has good connection with the strategic highway network, is accessible to Coventry's labour force; is located away from incompatible uses and has the ability to deliver high bay warehousing – see paragraph 2.10 (C).
    - there is a pressing need for new employment development in the plan period and because most of that need cannot be accommodated on brownfield sites within existing settlements the submitted plan's evidence base accepts that there are exceptional circumstances for the development on green belt land to meet this need - see separate representations to Policy S3 – Strategic Employment Land; Policy S7 Employment Allocations and Policy E2 – Employment Development.

(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.

Modification to the plan's proposals map to:

- Removal of the Brandon Lane site from the green belt because the site is Grey Belt.
- Allocation of the Brandon Lane site for employment development as per the related representations to Policy S3 – Strategic Employment Land; Policy S7 Employment Allocations and Policy E2 – Employment Development.

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

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

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

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

Because the Brandon Lane site as given in Appendix 1 to this representation is grey belt and also needs to be allocated for employment uses because of the evidence given in Windsor Developments representations policies S3, S7 and E2.

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 applicable.

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Regulation Draft 19 Submission Rugby Borough Plan

Representation made on behalf of Windsor Development Limited.

Contents

1. Summary of sought changes to the Regulation 19 submission draft Rugby Borough Plan "**Regulation 19 Plan**") to make the plan sound.
2. "Grey Belt" assessment with reference to the plans evidence base document "Green Belt Contribution Study Strategic Assessment, LUC October 2025.
3. "Exceptional circumstances" assessment for an employment site allocation at Brandon Lane.
4. Required modifications to make the submitted plan sound:

   Modification to the proposals map

   Modification to Policy S3 – Strategic Employment Land

   Modification to Policy S7- Employment Allocations

   Modification to Policy E2- Employment Development

Appendices

1. The Brandon Road site boundary.
2. Strategic land use context of the Brandon Lane site.
3. Brandon Lane illustrative site layout options (a) and (b) for employment use.
4. Transportation Note – DTA.
5. Response from RBC 25 August 2025 re request for a meeting.

1. Introduction and summary of sought modifications to the submitted plan.

1.1 This representation to the Regulation 19 Draft of the Rugby Borough Plan is submitted on behalf of Windsor Developments Ltd (**WDL**) owners of the Brandon Lane site as shown in Appendix 1.

1.2 The site's locational context in terms of surrounding land uses and access is given in Appendix 2.

1.3 In summary, WDL consider that in order to make the Regulation 19 Draft Rugby Borough Plan sound the submitted plan requires the following main modifications:

- Removal of the Brandon Lane site from the Green Belt.
- Allocation of the Brandon Lane site for employment use.
- Therefore, amend the plan's proposals map green belt boundaries and employment site allocations and also modify submitted Policies S3, S7 and E2.

1.4 Section 2 of this representation gives evidence as to why WDL consider that the Brandon Road site should be removed from the Green Belt.

1.5 Section 3 of this representation gives evidence as to why there are also other exceptional circumstances for the removal of the site from the green belt and allocation of the site for employment uses.

1.6 Section 4 gives an overall summary of the actions considered necessary in order to make the submitted Regulation 19 Plan sound insofar as it relates to the Brandon Road site in light of the evidence submitted as part of these representations with reference to specific policies Policy E2- Employment Development S3 – Strategic Employment Land; Policy S7- Employment Allocations; amendments to the Proposals Map.

1.7 In support of the representation, WDL submit the following evidence

- Strategic Location plan – Appendix 2
- Illustrative employment site layout options – Appendix 3(a) and Appendix 3(b)
- Transportation Statement - Appendix 4
- Response for a request for a meeting with Neil Holly, RBC planning team – Appendix 5

1.8 This representation also refers to the following documents as numbered below and which reference to documents under the Council's broad headings as specified in their evidence base to the submitted plan:

Development Needs

Document 1: Development Needs Topic Paper – December 2025

Document 2: Coventry and Warwickshire HEDNA- WMSESS Alignment Paper – Final Report – ICENI – November 2024.

Strategic Assessment Documents:

Document 3: Sustainability Appraisal (SA) of the Rugby Borough Plan – AECOM -December 2025

Document 4: Green Belt Contribution Study – Strategic Assessment – Final Report prepared by LUC - October 2025

Site Selection Documents

Document: 5 Rugby Borough Housing & Economic Land Availability Assessment 2025 – Appendix 4 – Site reference 145 – Land at Brandon Lane – and Appendix 5 – Ryton on Dunsmore

Document 6: Exceptional Circumstances Case – Topic Paper-December 2025

Other Papers

Document 7: Summary of Green Belt Changes proposed by Rugby Borough Council proposed submission Plan. December 20225.

2. Representation to Changes to the Green Belt Boundary

Green Belt/Grey Belt Assessment

2.1 Section 13 of the National Planning Policy Framework gives national policy relating to the Green Belt.

2.2 Paragraphs 142-160 highlight that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and permanence.

2.3 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.

2.4 Paragraph 146 states that exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review green belt boundaries in accordance with the policies of the framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes(taken together) of the remaining Green belt, when considered across the area of the plan.

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a. the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan

b, there is a demonstrable unmet need for the type of development proposed across the area of the plan

c. the development would be in a sustainable location with particular reference to paragraphs 110-115 of the Framework

d. where applicable the development meets the "Golden Rules" requirements of paragraphs 156-157 of the framework.

2.8 Guidance relating to assessing whether sites within the green belt land should be removed from the green belt because the site is "grey belt" land is given in paragraph 004 Reference ID 64-004-20250225. This states that where it is assessed the Green Belt area does not strongly contribute to Green Belt criteria a, b and d then the site can be identified as Grey Belt subject to footnote 7 of the NPPF.

2.9 Table 1 below gives our assessment as to why the Brandon Lane site is a Grey Belt site when assessed against these criteria and that it our opinion the site is not an "irreplaceable habitat" or designated as habitat site.

Table 1: Grey Belt Land Assessment

Grey Belt Criteria	Purpose/Contribution as given in Paragraph 004 Reference ID 64-004-202500225	Assessment of purpose/contribution of Brandon Lane site
Purpose A- to check the unrestricted sprawl of large built-up areas.	Strong Areas that contribute strongly likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features -be adjacent or near to a large built-up area -if developed, result in an incongruous pattern of development (such as an extended "finger" of development into the green belt Moderate Assessment areas that contribute moderately are likely to be adjacent or near to large built-up area, but include one or more features that weaken the land's contribution to this purpose a, such as (but not limited to): -having physical feature(s) in reasonable proximity that could restrict and contain development -be partially enclosed by existing development such that new development would not result in an incongruous pattern of development -contain existing development - being subject to other urbanising influences Weak or None Assessment areas that make only a weak or no contribution are likely to include those that: -are not adjacent to or near to large built-up area - are adjacent to or near to a large built-up area but containing or being largely enclosed by significant existing development	**Moderate** There are existing residential properties immediately adjacent to the eastern, western and southern parts of the Brandon Lane site. To the north the site is the A46 and the Airport Retail Park, which could be accessed by foot/cycle to the site via the existing underpass – although currently blocked to prevent public access. There are existing employment sites within the green belt immediately to the south-west of the site at Prologis Park, Ryton. The site is subject to other urbanising influences: • To the east of the site - the Coventry Investment Zone is being developed for major employment uses and major employment land use allocations are proposed to the south and west in the Regulation 19 plan requiring the removal of extensive tranches of green belt land. • Brandon Lane to the south of the site and its hedgerow will restrict and contain development to the south.

Grey Belt Criteria	Purpose/Contribution as given in Paragraph 004 Reference ID 64-004-202500225	Assessment of purpose/contribution of Brandon Lane site
Purpose B – to prevent neighbouring towns merging into one another	Strong Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: -forming a substantial part of a gap between towns -the development of which would be likely to result in the loss of visual separation of towns. Moderate Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to) -forming a small part of the gap between towns -being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserver visual separation. Weak or none Assessment areas that contribute weakly are likely to include those that -do not form part of a gap between towns, or -form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation	**None** The Brandon Lane site does not form part of a gap between towns.

Grey Belt Criteria	Purpose/Contribution as given in Paragraph 004 Reference ID 64-004-202500225	Assessment of purpose/contribution of Brandon Lane site
Purpose D – to preserve the setting and special character of historic towns	Strong Assessment areas that contribute strongly are likely to be free of existing development and to include all of the following features -form part of the setting of the historic town -make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being adjacent to, or of significant visual importance to the historic aspects of the town. Moderate Assessment areas that preform moderately are likely to form part of the setting and /or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to) -being separated to some extent from historic aspects of the town by existing development or topography -containing existing development -not having an important visual, physical, or experiental relationship to the historic aspects of the town Weak or None Assessment areas that make no or only a weak contribution are likely to include those that -do not form part of the setting of a historic town -have no visual, physical, or experiental connection to the historic aspects of the town.	**None** The Brandon Lane site does not form part of the setting and special character of a historic town.

Promotion of sustainable forms of development.

2.10 The allocation of the Brandon Road site as Grey Belt is also supported by paragraph 148 of the NPFF where development needs to promote sustainable forms of development as highlighted in paragraphs 110 -115 of the framework. This is because:

(A) Appendix 2 shows the site's strategic and proximity to:

- the strategic road network and Tollbar junction – serving the A45 London Road and A46 Coventry Eastern bypass to Coventry and Coventry City Centre and the adjacent, existing major manufacturing and storage/distribution/R&D employment sites to the southwest and east of the Coventry urban fringe;

- other major manufacturing and logistical developments now being developed adjacent to the site as part of the Gigapark/Coventry investment Zone.
- established bus services serving the Coventry/Warwick Gigapark – /Middlemarch Business Park/Rugby including routes 13, 21A, 85/85A and 85B and 86 Public transport services to Coventry City Centre/Railway Station.

(B) Appendix 4 – transportation assessment - which gives evidence that:

- the two illustrative options as given in Appendix 3(a) and (b) for potential employment generating developments can meet on-site parking standards and servicing access requirements.
- vehicular movements associated with the two possible employment development options can be safely accessed to the strategic road network and will not cause any significant traffic impact upon the strategic and local road network.

(C) The Brandon Lane site meets employment needs and site locational requirements as identified by the Council's own submitted evidence Topic Paper Development Needs-December 2025 – Document 6:

- after existing committed supply requirement for new industrial land supply is for 529,882 (310,711m2 large sites + 219,170.6 small sites) or 143.56ha (88.77ha + 54.79ha) in total. – paragraphs 3.27- 3.32.
- there is no clear basis to identify separate 'local' and 'strategic' need requirements in local plan policy. This is not justified, given the overlap between these categories – strategic sites being above 25 hectares – paragraph 3.47.
- "strategic sites" should meet the following criteria:
    - Good connections with the strategic highway network (for road)
    - Sufficiently large and flexible - ideally sites would be a minimum of 25ha and readily over 50ha
    - Is or can be served from an electricity supply grid with sufficient capacity.
    - Is accessible to labour and includes a clear sustainable transport solution for the local road network.
    - Is located away from incompatible land-uses
    - The ability to deliver high-bay warehousing

Green Belt Boundary Assessment - Conclusions

2.11 Development of the Brandon Road site for employment uses is not inappropriate development because:

- Removal of the site's green belt designation is supported by paragraph 155 – a, b and c of the NPPF because the site is grey belt as evidenced by Table 1 and also evidence that:
    - the site's strategic location will promote sustainable development and as required by NPPF paragraph 148 employment development – see paragraph 2.10. – points A &B.

- the site – although less than 25 hectares – is nevertheless a “strategic site” as specified by the Council’s own definition of strategic sites given in Document 1 – this is because the site has good connection with the strategic highway network, is accessible to Coventry’s labour force; is located away from incompatible uses and has the ability to deliver high bay warehousing – see paragraph 2.10 (C).

- there is a pressing need for new employment development in the plan period and because most of that need cannot be accommodated on brownfield sites within existing settlements the submitted plan’s evidence base accepts that there are exceptional circumstances for the development on green belt land to meet this need - see Section 3 paragraph 3.3 of this representation.

3.Representation for an employment development site allocation at Brandon Lane.

3.1 WDL consider there also exceptional reasons to have the Brandon Lane site removed from the Green Belt – not only because the site is grey belt – as evidenced in Section 2 - but also because there are exceptional circumstances to also have the Brandon Lane site allocated for employment land use within the Rugby Borough Plan.

3.2 These exceptional circumstances are considered to comprise of the following:

- The Council's own evidence base agrees that there is need for new employment land allocations within the green belt – see paragraphs 3.3 and the submitted plan proposes to remove 141 hectares of green belt land at Site 121 and 21 hectares at site 14 – Land north of Ansty Park and also a further 37 hectares of green belt land between these sites.
- WDL consider that the council's own evidence base underestimates the need for new employment land and floorspace – see paragraphs 3.4 to 3.28.
- Brandon Lane's strategic and sustainable location – see paragraphs 3.29 to 3.39
- The Brandon Lane site is developable over the plan period – see paragraphs 3.40 to 3.43
- The plan's employment spatial strategy is therefore not sound because it is based upon its sustainable appraisal referred to as Document 3 of this representation which fails to consider alternative sites and so remove the Brandon Lane site from the green belt and also allocate the Brandon site as an employment land because of erroneous and unsubstantiated assumptions regarding the sites deliverability – see Appendix 5.

Need for employment allocations within green belt.

3.3 We note the following paragraphs from the Council's own assessment of the *"exceptional circumstances"* justifying the allocation of employment sites within the green belt – as given in Document 6.

Paragraph 2.20

"The residual need after existing commitments comprises 310,711m2 (88.77ha) for strategic sites and 219,170.6 square metres (54.79ha) for local need, together with 2.5ha (10,000sqm) of Coventry City Council unmet local need. Therefore, approximately 60% of the residual need is for large sites to meet strategic need derived from the WMSESS or is unmet need from Coventry."

Paragraph 2.28

"There are several reasons why avoiding the Green Belt and accommodating all the large employment site need for opportunity area 7 beyond the Green Belt is not a sustainable approach and therefore why exceptional circumstances exist justifying Green Belt release on the Coventry urban fringe."

Paragraph 2.45

"Locating a significant proportion of the new employment land close to the Coventry urban fringe would minimise the need for this long-distance commuting. Furthermore, as is detailed below, the proposed Green Belt site allocations can deliver high quality cycling and convenient public transport links to a large workforce in Coventry that would be unachievable beyond the Green Belt."

Paragraph 2.51

"The WMSESS makes a number of statements which support the greater potential for manufacturing uses on the Coventry urban fringe in comparison to Rugby: "5.40 In most cases where labour is concentrated there is a poor supply of sites due to Green Belt – notably around the Birmingham conurbation. When making investment decisions the labour market is a key factor. Advanced / high-tech manufacturing will seek high quality graduates – for example universities or legacy areas such as Coventry, Warwick, and Birmingham south" and (5.51) in comparison to logistics users "Manufacturing sites are more likely to need enhanced access to labour markets, closer priority to urban areas and quality public transport.".

Paragraph 2.107 - Summary

"The above summarises the full examination of all reasonable alternatives to Green Belt allocation for meeting the need for employment land. More detail is set out in the HELAA, Stage 2 site assessment and supporting technical reports, in the Strategic Transport Assessment and in the Sustainability Appraisal report. Overall, there are significant disbenefits and constraints affecting the non-Green Belt options for accommodating the need for employment land and these add to the exceptional circumstances for the proposed Green Belt allocations."

3.4 **Assessment of employment need and proposed employment site allocations.**

Submitted Policy S3 – Strategy for Employment Land of the Regulation 19 plan Part A (ii) considers that the total amount of land and floorspace needed between 2025-2042 for employment uses use classes B2, E(g) (iii) is 1,034,000m2 (approx. 287 hectares) of floorspace. Part B of Policy S3 and Policy S7 Employment allocations then make site specific allocations sites to meet this identified need.

3.5 Evidence in support of Policy is given Documents 1,2 and 6 as identified in this representation.

3.6 WDL consider for reasons given below that the policies S3 and S7 are not justified and so not sound because of the following assessment.

A. Assessment of employment Need.

3.7 Policy S3 Strategy for Employment Land in respect of the provision of approximately 1,034,000 sqm of floorspace is inadequate and therefore unsound. In particular, the plan's provision underestimates likely future levels of both strategic and local employment needs over the entire plan period. This policy needs to be amended to include additional employment allocations, including the land at Brandon Lane.

3.8 Guidance in the current NPPF (2024) emphasises that the *"preparation and review of all policies should be underpinned by relevant and up to date evidence".* The proposed submitted local plan fails to carry out this guidance.

3.9 In summary, there are number of areas of concern that mean the figures are inadequate to provide employment land across the whole plan period.

1) The projected figures and the assumptions used to determine the overall level of employment land provision are out of date and fail to fully consider all factors that will influence the levels of need up to 2045.

2) Provision of the strategic land elements of overall employment land rely heavily on several of the large, allocated employment and mixed-use sites which depend on the provision of large significant infrastructure with complex delivery challenges and heavy infrastructure costs. These are likely to have a high degree of risk in the timing of delivery and is likely to impact on their ability to meet the employment need in the plan period.

3) The policy provision fails to take proper account of recent and current changing market trends and requirements for different types of employment accommodation. Consequently, the policy fails to provide employment land in the correct locations where employment needs and market demand exists.

3.10 The proposed level of land provision ignores a key part of the plan area on the fringes of the Coventry urban area related to the designated Coventry and Warwickshire Investment Zone (CWIZ). This results in overall provision falling short of what is necessary to meet overall levels of need to 2045 and failing to provide opportunities in the right places. The Investment Zone will, by definition, provide a major catalyst for growth across this whole part of the sub region.

3.11 It is therefore considered that the Council's evidence base is not justified because of the following:

1. Shortfall of overall employment land provision.

3.12 The projected figures on which the strategic elements of employment provision have been calculated on underestimated levels of likely future need over the plan period. The core figures for strategic sites date back to the HEDNA 2022 and the subsequent

3.13 Alignment Study (2024) which updated them. This relied on work done by Iceni on behalf of a number of Coventry and Warwickshire local authorities .In particular ,they fail to acknowledge recent market performance relating to take up of units on large available sites across the Borough .These take up figures derived from the period April 2021-April 2025 and set out in monitoring reports indicate that significantly higher levels of provision are necessary to sustain growth and meet strategic and local needs across the plan period to 2042.Total completions in this period were some 97.9 ha which represents some 82,366 sqm per annum of net floorspace over the period 21-25. This figure is considerably higher than the annual plan review projected requirement of 36,250 sq m per annum covering the period to 2045(ref RBC Topic Paper: Development Needs Dec 2025). The figures suggest that if current market demand levels were sustained the current allocations will be absorbed before the end of the plan period.

3.14 The recent performance of the major developments in the period 2021-2025 such as at Prologis Ryton, Apollo Park/Prospero Ansty and units1-4 and 5-7 at Symmetry Park, Rugby provide sustained evidence of high take up. These levels of take up exceed assumptions on which the local plan estimates are based and indicate the need to review the assumptions and final employment allocation figures set out in the draft plan.

2. Reliance on the delivery of the plan's employment needs on a few large-scale employment land allocations

3.15 The plan depends on the delivery of its employment land requirements on just a few large site allocations which do have significant infrastructure requirements with complex multi service/ infrastructure challenges. Examples include the land at Walsgrave Hill Site 121, Crowner Fields Farm – Site 95, South-West Rugby (Phase2). With market fluctuations, increased costs due in part to regulatory frameworks and the delivery challenges of location on the edge of busy urban locations such as the fringes of Coventry and Rugby the provision of the very large-scale schemes are prone to risk of slippage and delay. Experience suggests some will require review and revised implementation programmes. As is recognised, these large schemes are likely to come forward in the latter plan period post 2034 and this combined with underestimated levels of take up on existing "committed sites" before this date will lead to shortages in overall provision. This should be addressed by increasing the levels of provision including the release of additional sites in key strategic locations.

3.16 In total around 77% of all plan allocations are contained in these large sites. It is argued that this makes the plan delivery programme high risk. To offset this risk, additional provision on a range of smaller sites (local and strategic) should be made across the plan area well related to the urban edge of Coventry – such as at Brandon Lane.

3.Changing trends and the need for more flexible employment accommodation

3.17 The NPPF 2024 (Para 86(c)) emphasises that policy should have regard to facilitating development to meet the needs of a modern economy. In particular Chapter 6 of the NPFF *" Building a strong competitive economy"* paragraph 86 *(a)requires plan policies to have regard to the UKs Modern Industrial Strategy June 2025 and in particular, to support the identified priority sectors such as advanced manufacturing, defence industries, digital and technological businesses, financial services, life sciences and professional and businesses.)*

3.18 Undoubtedly there is much "soft' evidence of significant recent changes in market demand and changing requirements for new space. These changes are taking place in relatively short periods of time, largely since 2021 and will have a fundamental long-term impact on the location and type of sites required. It does not appear from the plan's evidence base that these changes have been fully considered in terms of the overall levels of allocation required across the plan period.

3.19 It is widely acknowledged that demand is being strongly impacted by the continued growth in e-commerce and online retail shopping. This steadily increasing growth shift from retail centres and established urban centres is set to continue and should be regarded as a steady long term change in consumer spending patterns .Savills argue that in turn this steady growth and change will continue to represent a major factor influencing the need for the provision of warehousing and distribution facilities.(Savills Big Box Briefing 2025).This in turn generates steadily increasing demand for major retail warehousing and distribution of a wide variety of types.

3.20 In addition to this evidence regarding market take up, there is new market related evidence suggesting that the assumptions employed in the plan review to calculate plot ratios for large and small units and hence the overall land required are out of date and therefore incorrect.

3.21 It is evident from recent data across the East and West Midlands that the industrial and logistics market particularly for larger units in the sector are subject to recent changes .This is being caused by a variety of factors that revolve around a desire for more advanced ,adaptable and flexible buildings which sit on bigger footprints, are energy efficient and also impacted by a desire to meet a range of environmental objectives. The buildings are "robot friendly' and can accommodate technology in roof spaces .Data on recently completed warehouse and distribution buildings across the West Midlands indicates that development densities are on average lower than the assumed 0.35 plot ratio used to calculate land requirements in the plan (note -these assumptions date back to the WMSS 2023/24) .One local example would be SEGRO Park ,Coventry adjacent to the airfield, where a plot ratio of approximately 19% is achieved. This is not an isolated trend as research submitted by Stantec (reference local plan representations 2025) clearly highlights.

3.22 If the evidence of these very recent market trends on development densities for large warehousing and storage buildings were applied to the figures set out, additional employment land is required to meet needs across the plan review period to 2042.

3.23 At the other end of the spectrum the market for smaller units is also subject to change. For example, the growth of very large warehousing units (size reference) located near motorways and major junctions has also created a requirement for smaller "feeder" units linked to the large units and acting as local distribution hubs. This recent trend is not dealt with and further exemplifies a failure to address the changing trends and functional relationships between types of storage and distribution space. This indicates a functional need for a broader range of distribution sites to serve both local and regional markets.

3.24 There is currently an acknowledged shortage of smaller and medium sized developments across the plan area and this is recognised by the Council in its evidence base and in particular set out in Appendix 1 their Economic Strategy 2025-2035. The Local Plan Policy seeks to address this by the inclusion of a requirement on a two sites(for example Walsgrave Hill, and Coton Park East) to provide smaller units. However, as a significant element of this smaller site's contribution (i.e. sites under 25ha) are linked to the provision timing and implementation of a range of the large "strategic" units. It is unclear when and how these smaller sites will be brought to the market. This linkage may influence and constrain the timing and availability of the smaller units and, in turn, impact on the delivery and supply of smaller units.

3.25 In addition, the draft policy does not address the issue of the likely tenure of smaller and medium units which will be important in the targeting of smaller and medium sized units. It is clear from evidence that shortages of accommodation are in part related to a lack of availability of freehold tenure units. There has been and remains significant local and regional demand across Coventry and Warwickshire for smaller commercial and industrial units from both existing businesses wishing to expand and businesses that wish to move into the sub region. This is, in part, driven by the tax and pension advantages that exist for smaller companies and businesses from freehold investments linked to pension funding and other related purchase mechanisms (Ref; Coventry and Warwickshire Market Signals Report). However, it appears that new and second-hand smaller units (up to say 1500m2) are only

made available as leasehold properties that are part of managed larger scale developments. As noted above this is likely to be the case with land at Walsgrave Hill and Coton Park East where delivery of smaller units is likely to be linked to the provision of larger “strategic “units.

3.26 It is recommended that the level of provision for smaller industrial and warehouse units is increased and the range of locations on which smaller units are proposed is diversified. This increase in provision can be achieved by retaining a focus on land in Rugby borough close to the Ring Road and recognising the benefits of land areas close to the emerging Investment Zone provision. This is dealt with in more detail in the section below.

4.The geographical distribution of the proposed employment growth across the plan area.

3.27 As noted above in this submission the draft employment policy framework fails to acknowledge the significance and likely impacts of the designation of the Coventry and Warwickshire Investment Zone (CWIZ). As set out, this is focused on separate development areas around the Coventry Airport facility and is already the subject of considerable public investment and promotion. This is a national policy initiative that reflects the government’s Industrial Strategy 2025 and should be accorded much greater importance in the local plans policy framework. Failure to do this may undermine the importance and potential benefits that the range of measures that the WMIZ introduces to this part of the Coventry sub region.

3.28 The likely impacts of the WMIZ on areas in Coventry City, Warwick District and Rugby Borough that all abut the designated area should be recognised in the submission Local Plan. The likely impacts should be fully evaluated in this and the neighbouring development strategies. The plan strategy should provide for in the wider policy area to maximise the benefits of the considerable investments being made in this part of the Coventry area.

3.29 This work should review the potential of adjacent land currently allocated as Green Belt land alongside the Coventry Ring Road (A45/A46) including the Brandon Lane site.

Brandon Lane’s strategic & sustainable location

3.30 The Brandon Lane site strategically located at Coventry’s urban fringe and is within close proximity to existing major employment sites for manufacturing and logistics including battery storage facilities and the Coventry Investment Zone as shown in Appendix 3.

3.31 An allocation for employment uses as illustrated in Appendix 4 is supported by the Council’s own exceptional circumstances assessment – as given paragraph 3.3 – given the site’s strategic location with close proximity to Coventry’s urban fringe and workforce.

3.32 The site comprises approximately 16 Ha of relatively flat land located on the southern side of the Coventry urban area adjoining the public highway, Brandon Lane. The site was formerly occupied by a commercial fruit farming business which extended to the north across the Coventry Ring Road. The site is bounded by well-defined mature hedgerows. Brandon Lane itself is close to the junction with the main A45 London Road which lies some 150m from the Toll Bar End Junction on the Coventry ring road.

3.33 The site is in a highly sustainable and accessible location adjacent to main highway and transportation network that serves the Coventry city and surrounding area. As noted above , the site is close to the main Toll Bar End junction of the Coventry Ring Road (A45/A46) which provides good connectivity to both the main urban area of the city of Coventry and the sub regional and national motorway network (ref; M6 Junction2, M69 and the A 46 trunk road connecting to M40 motorway).The site is therefore well placed to function as both a sub-regional and a local hub for warehousing, distribution and industrial uses to service the adjoining urban area.

3.34 Its strategic location also offers the opportunity for the site to be serviced by a wide range of travel and movement modes including walking (to local service facilities), cycling and public transport as well as good access by car and HGV transport as noted below. (Ref illustrated on attached plan). Close to the site are a number of bus stops providing a range of frequent connection services to Coventry City Centre, Coventry rail station, Rugby town and the universities of Coventry and Warwick.(**See Footnote 1**)

3.35 The site has good access to Brandon Lane which in turn links the site to the main A45 and the A423 that are both served off the Tollbar End junction. Appendix 5 gives a transportation note highlighting that local junction improvements can be carried out to further improve local access between the site and the main strategic road networks.

3.36 The site adjoins the built up edge of the Coventry city urban area close to a range of facilities that include food retail, café's and other "district "level facilities .This part of the City is part of a vibrant sub area known as Willenhall that includes existing and proposed housing development ,retail provision and new employment growth focussed in and around the current Coventry airfield. The airfield is due to close in mid-2026 to accommodate new infrastructure. More details of these growth proposals are set out below(ref). The location also provides ready access to a large potential local labour market pool which can supply a range of new jobs arising from development of this site and other nearby proposals.

3.37 The Coventry City Council and Warwick District Council (the airport is mainly in this latter administrative area), have for some years been seeking the redevelopment of Coventry Airport and its surrounding land. In January 2022, these Councils granted planning permission to redevelop the airport site for a battery manufacturing facility, a so called "Gigafactory" unit. To date the site has not attracted investment likely due to constraints with power supply in the general area. In 2025 the outline consent was renewed, and proposals are now being brought forward to close the operational airfield and invest some £23m in developing a 30-megawatt electricity sub-station together with a range of new roads to enhance the investment potential of the site. The proposals for the redevelopment of the airfield have subsequently become an integral part of the designation of this part of the city region as the Coventry and Warwickshire Investment Zone (WMIZ), an initiative developed by the UK government.

3.38 One of the most significant and compelling factors that supports the release of the Brandon Lane site from Green Belt allocation and its allocation for development is the proximity of the C&W Investment Zone (CWIZ)part of an overall West Midlands Investment Zone, a central government initiative that dates back to March 2023.A delivery plan for the WMIZ was approved by central and local government in June 2024 aimed at boosting local specialist manufacturing ,"green industries" and the health technology sectors. The Zone is created as part of a "core mission" by Government to tackle barriers to growth using tax incentives, capital allowances, rates reliefs and direct funding investment. It is estimated that the designation will attract over £160m in funding and support. The Zone along with other designated areas across the country now sits within the UK Governments Modern Industrial Strategy 2025.

3.39 The Coventry& Warwickshire elements of the WMIZ are based on several key sites which are allocated for different types of development and which in part has already been implemented -these are illustrated in the attached context plan which show the extent of this part of WMIZ and its relationship to the site at Brandon Lane. The current phase of infrastructure funding in respect of this area is, as noted, dedicated to the provision of strategic infrastructure and power supplies and the redevelopment of the former Coventry airfield now known as "Greenpower Park". The land across the CWIZ is being actively marketed and promoted to potential developers and businesses on a national and international basis.

3.40 It is highly significant that this current draft Submission Local Plan review fails to acknowledge the emergence of the plans for the WMIZ or its significance for the immediate area and its importance to regional and national development policy. The proximity of the Zone and its all-round support by local regional and national government suggests that the Zone and its surrounding areas should be examined for their long-term development potential. It is argued here that all vacant land adjoining the Investment Zone will come under pressure to accommodate both development and infrastructure. As is set out here, there is a strong and compelling case that because the Investment Zone has to date been overlooked as an influence on Plan making it should now be re-evaluated and the area of land in which the Brandon Lane site sits be excluded from Green Belt to recognise its future development potential.

Footnote 1: *Bus Stops nearby in short walking distance from the Brandon Lane site are located on London Road, Siskin Drive, Rowley Rd, Middlemarch Business, Montgomery Close, Robert Close. The main bus services are numbers 21A,25,41,12X*

Brandon Lane Site – Developability during the plan period

3.41 In light of the Council's own assessment of exceptional circumstances justifying development of green belt land for employment land identified in paragraph 3.3, Windsor Developments consider that the plan is not sound because the plan omitted Brandon Lane as also an employment land allocation.

3.42 The Brandon Lane site was omitted as site allocation because both Rugby Borough Council's own consultants and Borough planning officers considered that the Brandon Lane site is not available for development over the plan period as given by:

(a) Rugby Borough Housing & Economic Land Availability Assessment 2025 – Appendix 4 – Site reference 145 – Land at Brandon Lane – and Appendix 5 – Ryton on Dunsmore – referred to as Document 5 in this representation.

"Green Belt site. At edge of Coventry. PROWs cross site. Not designated public open space. Adjacent Local Nature Reserve. Adjacent Local Wildlife Site. Potential impacts on the SRN. Within SSRI Impact Risk Zone - need to consult Natural England if large infrastructure such as warehousing / industry where total net additional gross internal floorspace following development is 1,000m² or more / residential of 100 houses or more. Majority of site covered by Priority Habitat Areas - Deciduous Woodlands and Traditional Orchard. Loss of this habitat would be unacceptable when other non-constrained sites are available."

(b) Response from RBC re request for a meeting to discuss the Brandon Lane site – see Appendix 5.

"We are not willing to hold a meeting at this stage. We are a small team and we receive a lot of requests from landowners, developers and land promoters for meetings. We therefore need to prioritise those meetings on sites that we consider have a reasonable prospect of allocation in the local plan.

There are a number of constraints that mean that I do not think the Brandon Lane site has reasonable prospects. In particular, this is a sensitive area of Green Belt, there would be traffic challenges, and the site was until recently largely wooded. In calculating biodiversity net gain site clearance after 30 January 2020 is disregarded. Therefore, the BNG requirement would be assessed based on the January 2020 or pre-clearance, biodiversity value at which point both aerial photography and the Warwickshire phase 1 habitat survey demonstrate that the site was deciduous woodland. In light of that, I don't think there is a reasonable prospect of 10% BNG being able to be demonstrated for a viable development of the site when assessed against the pre-clearance biodiversity value."

3.43 WDL reject these site assessments and consider that the Brandon Lane site is developable during the latter part of the plan period for employment generating use for the following reasons:

- The site is in a single ownership by Windsor Developments.
- The site is a grey belt and should therefore be removed from the Green Belt as evidenced in Section 2 of this representation.
- The site has no "traffic challenges" associated with a possible range of employment uses at the site as evidenced by the Transportation Statement as given in Appendix 5.
- The site was cleared in 2025 and is at the time of this representation subject to a restocking notice dated 16 January from the Forestry Commission. This restocking notice is now subject to an appeal and the outcome of that appeal is unlikely to be known before the plan is adopted.
- In the event that the appeal is unsuccessful the site will be replanted with trees as required by the replanting notice and this planting scheme will be in force for 10 years.

- However, after the 10 year period – i.e.at the end of the plan adoption period – a planning application can be submitted and negotiated for the site to be redeveloped for a mix of employment uses with an alternative tree planting scheme either on site and also replanted off site as part of a planning application.
- Bio-diversity net gain requirements can also be provided partly on site or off site and the Council have provided no evidence that development of the site for employment related uses are unviable.
- In making a planning application all material considerations need to be taken into account at the time of the submission of the planning application – including weighing the employment development at a sustainable and strategic location to meet employment needs set against environmental considerations.

3.44 Development of the site for employment uses is sustainable development or reasons given paragraph 2.10 of this representation.

Exceptional Circumstances – Conclusion

3.45 The Council's own evidence as given in Document 6 recognises that not all of the plan's employment needs can be met on brownfield sites and as a consequence exceptional circumstances exist justifying the submitted plan's spatial strategy to remove green belt land between Ansty Park – Site 14 and Site 121 – totalling some 37 hectares – and a further 21 hectares land north of Ansty Park and 141 hectares at site 121 – land at Wargrave Hill.

3.46 However, the spatial strategy dismissed the availability of the Brandon Road site at the outset because the site was considered not to be available for reasons given in paragraph 3.42 and Appendix 5 of this representation.

3.47 Consequently, the submitted plan omits the Brandon Lane in the sustainability appraisal – Documents 3 and the site's availability – Document 5 – for removal from the green belt and so dismisses the site as a sustainable location for an employment allocation.

3.48 The proposed spatial strategy is not sound because there are also exceptional circumstances for the allocation of the Brandon Lane site for employment land uses because:

A) The Council's own evidence base accepts there is a significant need for new employment land and this need cannot all be made on either brownfield sites or on land outside the green belt and therefore a requirement for allocating employment within the green belt – see paragraph 3.3.

The submitted plan's proposes major allocations of new employment land adjacent to Ansty Park and Wargrave Hill which requires the removal of significant amounts of isolated green belt parcels land.

This release of green belt land causes significant harm to the openness of the green belt compared to the release of green belt land at Brandon Lane – see paragraphs 3.2 to 3.3 because Section 2 and Table 1 gives evidence that the site grey belt.

(B) The submitted plan underestimates the supply and type of employment land required to meet the plan's needs – see paragraphs 3.4 to 3.26.

(C) The Brandon Lane site is strategically located at Coventry's urban fringe and represents sustainable development given the site's close proximity to existing strategic employment sites for manufacturing and logistics and Coventry's Investment Zone – see paragraphs 3.27-3.40 and Appendix 2.

(D) The Brandon Lane site is developable over the plan period for employment use – see paragraphs 3.41-44 and Appendices 3 and 4.

4. Sought Modifications to the submitted plan

4.1 In light of the evidence given in Section 2, with reference to Table 1, and Section 3 of this representation, to make the submitted plan sound the plan needs to make the following modifications.

4.2 **Modification to the plan's proposals map to:**

- Remove the Brandon Lane site from the green belt because the site is Grey Belt.
- Allocation of the Brandon Lane site for employment development.

4.3 **Modifications to Policies S3 and S7 and Employment Site Allocation Annex.**

Policy S3 – Strategic Employment Land

Modification to the table under the policy heading:

"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	Approximate square metres of floorspace 2025 2042
New allocations under Policy S7 Land at Brandon Lane	 46,000

Policy S7 – Employment Allocations

As highlighted in paragraphs 3.15-3.16 Policy S7 places undue reliance on the development of a limited number of very large sites (5 sites as listed) which as noted in the submissions in respect of draft Policy S3 may be impacted adversely by delays and viability issues. This contains no contingency if such delays occur. In turn, this may impact negatively on the overall delivery of employment land across the plan period to 2042.

The plan therefore needs to be modified to include a range of smaller sites including

Site Name	Floorspace
Land at Brandon Lane	46,000 sq m

Policy S7 Employment Site Allocations - Annex

Inclusion as an Employment site Anex - Land at Brandon Lane – Illustrative Site Options Plans 1 and 2 as given in Appendix 3 to this representation.

4.4 **Modifications to Policy E2- Employment Development**

Modification to Part E of Policy to an in new criteria

v." where there is evidence that during the plan period the employment allocations given in Policy 7 are unable deliver the plan's identified employment needs."

Appendices

Appendix 1 – Site Location Plan

Appendix 2 – Strategic Context Plan

Appendix 3 – AJA Indicative site layout options (a) and (b) for employment use at Brandon Lane.

Appendix 4 – Transportation Note - DTA

Appendix 5 - Response from Neil Holly, Development Strategy Manager at RBC, re a request from WDL for a meeting 25 August 2025 – as included in this document below.

Appendix 5 – Response from Neil Holly, Development Strategy Manager, Rugby Borough Council

"We are not willing to hold a meeting at this stage. We are a small team and we receive a lot of requests from landowners, developers and land promoters for meetings. We therefore need to prioritise those meetings on sites that we consider have a reasonable prospect of allocation in the local plan.

There are a number of constraints that mean that I do not think the Brandon Lane site has reasonable prospects. In particular, this is a sensitive area of Green Belt, there would be traffic challenges, and the site was until recently largely wooded. In calculating biodiversity net gain site clearance after 30 January 2020 is disregarded. Therefore, the BNG requirement would be assessed based on the January 2020 or pre-clearance, biodiversity value at which point both aerial photography and the Warwickshire phase 1 habitat survey demonstrate that the site was deciduous woodland. In light of that, I don't think there is a reasonable prospect of 10% BNG being able to be demonstrated for a viable development of the site when assessed against the pre-clearance biodiversity value."

Regards,

Neil Holly