

ID	Name	Organisation	Client	Policy Number	Summary of Representation	Changes to make plan legally compliant or sound	RBC Response
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Key	
	Added 23.11.17
	Added 6.12.17
	Added from another policy

1871	David Green	Delta Planning	Prologis UK Ltd	ED1	<p>Inset Map 26 - Prologis Park, Ryton has an extensive planning history and now benefits from employment use planning consent with developments extending to over 2 million sqft of floor space and offers a major benefit to both Ryton and Coventry's employment markets. Local plan still shows the site as within the green belt, however given the scale of the development approved it makes no logical sense to remain in the green belt as it serves no green belt purpose. As site not considered in Green Belt Review then it appears that it was considered such low value that wasn't regarded as worthy of consideration in Green Belt terms. Removal from Green Belt would assist from operational point of view</p>	<p>Prologis Ryton site should be removed from the Green Belt on Inset Map 26.</p>	<p>Despite its location within the Green Belt, this site remains a strategically significant employment site in the Borough and is covered by proposed local plan Policy ED1. The site adjoins the main rural settlement of Ryton on Dunsmore between the village and the urban area of Coventry; however the site is separated by open greenfield land to the north and west between the site and the main urban area. Whilst the site is undoubtedly an urbanising influence in this part of the Green Belt, it is important that the Green Belt designation is retained to prevent, in particular, the unrestricted sprawl of the urban area and the merging of settlements.</p>
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1872	Rob Wells	Savills	Neyland Properties Ltd	ED1	<p>We do not object to the overall objective of the policy to protect and renew existing employment sites but we consider that insufficient emphasis has been placed on their ability to contribute to achieving the qualitative demand for smaller units identified elsewhere in the plan. We therefore consider that the policy should be made more explicit in this regard which would then potentially reduce the burden currently being placed solely on Coton Park East to deliver such units.</p>	<p>For consistency of approach and unless existing sites can be proven to not be suitable or capable of delivering smaller units, there should be a requirement on all sites to do so as part of the redevelopment proposals. The following should be added: “Redevelopment of existing employment sites will be expected to provide smaller units in the range of 5,000 – 50,000sq, ft, in B1c, B2 and ancillary B8 employment”.</p>	<p>It is acknowledged that existing employment sites in supply, through further investment and potential redevelopment, also offer an opportunity for provision of smaller employment units to help meet a qualitative need identified by the Rugby ELS (2015). Supporting text (para.6.5) to proposed Policy ED1 is made to reflect this, as indicated by modification LP54.66.</p>

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1876	David Keene	David Lock Associates	Manse Opus LLP and Rolls Royce	ED1	<p>Policy fails to recognise importance of Rolls Royce site and allow for its optimum regeneration and redevelopment. The policy gives some positive support for the intensification of existing employment sites. Major development proposals are being prepared to demonstrate how this can be done at Rolls Royce Ansty. Strongly consider that Policy ED1 should be framed in the most positive way possible to encourage major investment.</p>	<p>Add additional sentence to para.2 of ED1 - "The potential regeneration and redevelopment of Rolls Royce Ansty is of major significance to the local and regional economy; significant intensification of employment uses on the site will be specifically encouraged when a comprehensive outline planning application is prepared."</p>	<p>It is considered that proposed Policy ED1, which continues protection of the Rolls Royce - Ansty site as a strategically significant employment site in the Borough, is positively prepared in supporting the improvement, expansion, redevelopment or intensification of existing employment areas. Despite the Green Belt location of this site, the Council has a strong track record of working with landowners and developers to enable development to occur on major developed sites in the Green Belt where they are clearly an important part of the existing local and sub-regional employment supply, as indicated by their inclusion in Policy ED1.</p>

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1907	Martin Herbert	Brown & Co	Edward Walpole Brown	ED1	<p>Whilst there is reference to Ansty Park, consistent with comments which have been made before, there is no facility in the Plan for this to be increased in size to reflect its importance, not only in terms of the Borough but also regionally. This, coupled with associated housing growth, would produce a mixed use site that is consistent with NPPF Policies and which should be preferred in preference to other sites proposed through the Plan process.</p>		<p>The Local Plan target allows for flexibility in supply to deliver employment land requirements based on consideration of forecast jobs growth, increases to resident labour supply, and projections of past take-up rates of employment land. Policy is formulated in relation to the evidence base and is considered to be sound. The Local Plan sets out how completions, existing supply and proposed new allocations meet this target and therefore no further employment land allocations are considered necessary. The provision of employment land in Rugby Borough to address a shortfall in meeting sub-regional strategic employment needs, arising from the unmet needs of Coventry City, has been addressed through Duty to Cooperate and the Coventry & Warwickshire Employment Land MoU agreed in 2016.</p>
1929	Martin Robeson	MRPP	Threadneedle Pensions Ltd	ED1	<p>The policy is based on NPPF paragraph 22's "No reasonable prospect test", which also states that "Land allocations should be reviewed regularly". The marketing period appears to be based on a 2007 DTZ study which identifies 21 factors in considering a planning application resulting in the loss of employment land- including marketing- but does not define a set marketing period- and marketing is one of only a</p>	<p>Paragraphs 3,4 and 5 of the Policy should be deleted. A new paragraph should be inserted stating "Proposals for the redevelopment or use of land currently or last used for B-Class purposes will be permitted subject to there being: No significant harm to the supply of remaining B-</p>	<p>Acknowledged that policies should avoid the long term protection of employment sites where there is no reasonable prospect of a site being used for that purpose. The evidence base demonstrates that marketing of existing employment land is an effective way of showing there is no longer a demand for land to be used for employment purposes, however it is important to distinguish in marketing duration required between those employment sites that are designated in policy and are higher quality strategic sites, and</p>

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					<p>number of factors. Insufficient weight given to market signals. Marketing is 1 of only 6 test identified by GL Hearn. The 2007 study does not appear to be a part of the evidence base despite the policies reliance upon it. The GL Hearn's study findings that 79ha of employment land is needed is conservative- the plans identified supply is sufficient to meet this. This should be monitored so that planning applications are assessed on the basis of up to date evidence. With information of market signals available there is no logic is delaying the delivery of development through the marketing exercise. Marketing exercises are problematic as every unit is incomparable and the delay they entail goes against the purpose of the planning system and the two years delay will affect investment and flexibility. The release of surplus employment land is crucial in meeting housing needs. The plan is unsound as ED1 is not positively prepared, justified, effective or consistent.</p>	<p>Class land and premises serving the borough in terms of qualitative and quantities considerations". The policy will then be positively prepared since it would seek to meet objectively assessed need, justified as it would be the most appropriate when compared with marketing, effective as it will support the plans deliverability and consistent with national policy.</p>	<p>other employment sites. Supporting text at para.6.8 provides flexibility for development proposals to demonstrate where other tests rather than marketing may be more appropriate to demonstrate there is no reasonable prospect of an employment site being used for that purpose.</p>

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1911	Peter Wilkinson	Salisbury Investments Ltd	R Galey	ED1	<p>NPPF Paragraph 22 states planning policies should avoid long-term protection of employment sites. NPPF Paragraph 51 states commercial to residential changes of use should normally be approved. Policy ED1 imposes onerous requirements on landowners to demonstrate that a site is no longer viable in B uses. Prolonged periods of marketing could be financially difficult for landowners to sustain.</p>	<p>Policy re-worded to: "For proposals that would involve the change of use or loss of any land used for employment purposes, evidence must be provided to demonstrate that the land or unit under consideration is no longer viable for a B-use class and/or that the loss of employment land would not have an adverse impact on the Borough wide supply of employment land. Evidence can comprise the results of the site being actively marketed with no serious interest shown by a B use class occupier or other appropriate tests, including a review of the supply of employment sites in the locality."</p>	<p>Acknowledged that policies should avoid the long term protection of employment sites where there is no reasonable prospect of a site being used for that purpose. The evidence base demonstrates that marketing of existing employment land is an effective way of showing there is no longer a demand for land to be used for employment purposes, however it is important to distinguish in marketing duration required between those employment sites that are designated in policy and are higher quality strategic sites, and other employment sites. Supporting text at para.6.8 provides flexibility for development proposals to demonstrate where other tests rather than marketing may be more appropriate to demonstrate there is no reasonable prospect of an employment site being used for that purpose.</p>
1986	Malcolm Hockaday	NA	NA	ED1	<p>ED1 not consistent with the evidence base, NPPF and would have unsustainable consequences. Supporting text provides no justification for the 12 months marketing for non-designated employment sites, the</p>		<p>Acknowledged that policies should avoid the long term protection of employment sites where there is no reasonable prospect of a site being used for that purpose. The evidence base demonstrates that marketing of existing employment land is an effective way of</p>

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					<p>2007 DTZ study provides a range of criteria for assessment, only one of which mentions marketing, these are: whether land is designated, whether the proposed alternative use fits with other strategic aims, whether there is adequate supply of employment sites, suitability of vehicular access, would loss be detrimental to local economy and whether there is suitable alternative accommodation- the policy limits the assessment purely to marketing evidence. The evidence base indicates a policy basis which includes a wide range of criteria for assessing applications for alternative- which 2015 GL Hearn study indicates is still relevant. Local Plan making should reflect the three strands of sustainable development- social aspects as well as economic. NPPF Paragraph 22 suggests only protection for allocated employment sites, not non-allocated sites- thus ED1 goes beyond the NPPF. Rugby already has a lot of employment land allocated. Unallocated land could be used for housing delivery, especially as there are numerous disused employment sites.</p>		<p>showing there is no longer a demand for land to be used for employment purposes, however it is important to distinguish in marketing duration required between those employment sites that are designated in policy and are higher quality strategic sites, and other employment sites. Supporting text at para.6.8 provides flexibility for development proposals to demonstrate where other tests rather than marketing may be more appropriate to demonstrate there is no reasonable prospect of an employment site being used for that purpose.</p>

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1467	Clare Siddaway	NA	NA	ED2	<p>Concerns over an increase of traffic and pollution at Dunchurch crossroads. Population projections are too high as they don't take into account reduction of immigration due to Brexit. Warehouse development at the A45 near Thurlaston is inappropriate and will change the nature of the area. There is currently a lack of GPs and schools in the Dunchurch and Bilton area.</p>		<p>The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The measures contained within the IDP and DS9 informed by the STA mitigate the impacts of the SW Rugby allocation. Consequences of Brexit on household projections not yet clear. Government maintains that local planning authorities must ensure continue working towards up to date adopted local plan. Household projections are the starting point for arriving at housing need. WCC Education and Highways, UHCW and CCG, and Highways England have all been fully engaged in development of the Local Plan and infrastructure measures as contained within IDP. None have raised objections to the plan. Detail of infrastructure to be provided to support local plan growth is contained in policies and the IDP which is a live document and has been updated at modifications LP54.116-140.</p>

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1530	Dr Edmund Hunt	NA	NA	ED2	<p>Overall I believe there is a lack of transparent information, notably the fact that prospective logistics developments that may support the South West Expansion have not been articulated or mentioned. Objectives - would support Economic objective 4 for no over reliance on logistics DS5 - defines strategic housing areas >100 but Coton House is at 100 yet this site meets very few of the criteria for 100 above even though it is so close to a strategic development (sceptically convenient?!). I appreciate a line has to be drawn but Coton House does little to meet sustainable development objectives and there should be limits to any further development at Coton House to mitigate against it becoming a large scale development with no sustainable benefits. DS8 - With strategic objective to not rely on logistics, there appears contradictions with the proposed Symmetry Park application near Dunchurch. Considerations need to be given to how this development would invest in the local road network to support the entry to South West Rugby and mitigate against Dunchurch travel flow. ED2 - Support this and would request</p>	<p>Ensure transparency of call to action for development sites Be more thorough and committed to how you will ensure the success of Rugby Town Centre It is disappointing that, within your duty to cooperate, I am not aware of you informing adjacent Parish Councils, whose residents use rugby, about the consultation more actively. Also see previous comments.</p>	<p>South West a proposed allocation-landowners are able to promote land outside of the Local Plan process. The Local Plan seeks to allocate 110 hectares of employment land based on a number of factors identified within the evidence base such as average rates of past employment land take-up. Employment mix is informed by the Employment studies contained within the evidence base. All sites submitted to the council through the SHLAA call for sites have been considered against the same SHLAA methodology to identify the most suitable, available and achievable, deliverable and developable. Coton House has been subject to an SA. The STA June 2017 updated the September 2016 STA by increasing the modelled area so that it extends south to the of the A45 and into Daventry DC, it has incorporated updated travel to work assumption, junction counts and queue surveys, to identify the strategic transport infrastructure to support the Local Plan. The delivery of the South West spine road is a necessity infrastructure requirement to support the delivery of the Local Plan. There is nothing before the Council that would suggested that the road will not be delivered. STA has shown that proposed mitigation schemes reduce traffic flows through Dunchurch crossroads compared to the existing levels.</p>

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					<p>the policy goes further to ensure that large scale logistics developments close to the town would be closely considered by RBC. The policy therefore needs to ensure Rugby and its Local Plan have influence on Magna Park and any prospective developments, notably 6.12 and the proximity of employment land to residential areas given the lack of close, viable residential amenity to Magna Park H2 - Do not agreed given the prospective increase in logistics in SW Rugby. Would suggest an increased proportion of affordable housing in particular at any sites close to employment land (e.g. New South West Rugby to accommodate potential logistics expansion for lower income employees) TC3 - not quite clear how this prioritisation of retail allocation will be delivered in reality - the current trend for rugby (and many other) citizens is for out of town convenience, therefore RBC will receive developer interest for large scale retail areas. Should a policy not focus on limiting out of town allocation, in other words, categorised between in town and out of town TC3 - I could not clearly understand how the local</p>		

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					<p>plan is going to commit or ensure improvements are made to the town centre. Surely a call for sites, or at least evidence of a similar process, should be done to transparently identify the town centre long term plan and sustainable future according to NPPF. D1 - some evidence behind to validity / success of Travel Plans and the rationale for including them should be provided as there is very mixed success of them D1 - it appears slightly surprising there is not a specific or clear policy that identifies key strategic routes around Rugby (e.g. A45 / A426) and how these need to be assessed an invested in as the Town grows significantly in the coming years. There is little emphasis on driving new technologies or lower carbon emission transport infrastructure to support a cleaner, quieter, safer town centre and surrounding traffic routes.</p>		

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1900	Louise Steele	Framptons	DB Symmetry, Taylor Wimpey, Gallagher Estates, Richborough Estates and Warwickshire County Council	ED2	The Parties consider that this policy is consistent with national policy as it will enable the delivery of sustainable development.		Support noted

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1429	Gemma Basterfield	Coventry & Warwickshire Chamber of Commerce	NA	ED3	<p>Concern that local authorities process for establishing employment allocations relies too much on demographic and labour force projections and not enough on market signals and market intelligence. The C&W sub-regional target of 714ha (cf. MOU) is grossly inadequate. Due to plan periods beginning in 2011, a time when the economy was still impacted on by the recession, levels of demand relied upon to set employment allocations are significantly understated against real business needs and land supply figures are already out of date. Supply indicates there is only one site (Coventry Gateway) in or near Coventry that could be available for major manufacturing inward investment to 2031. RBC should plan for significant growth of employment land available by removing land from the Green Belt near existing Ansty Park site (between Ansty/Rolls Royce site, M6, A46 and planned housing site at Walsgrave) through the Local Plan process, or as a minimum safeguarding this land for additional sub-regional employment needs beyond 714ha.</p>		<p>RBC's local employment needs evidence, which informs RBC's contribution to the 714ha employment land target for the sub-region, considers the performance of the local economy in the context of the recession of 2008-2013. For example, forecasts used from Cambridge Econometrics in December 2014 were consistent with actual jobs growth observed by ONS between 2011-13; in this respect RBC are confident that the methodology for projecting labour demand did not underestimate jobs growth for the entire plan period due to the effects of the recession. Whilst a plan period of 2011-31 does mean a proportion of the employment target will have been delivered prior to adoption of the plan and does not therefore represent future land supply, there is still a significant amount of land proposed in supply for the remainder of the plan period, particularly via existing undeveloped permissions and new local plan allocations. With regards to sub-regional needs, the C&W Employment MOU shows that RBC is in fact over providing on employment land provision for the needs of Coventry City based on the overall shortfall identified and redistribution attributed to Rugby Borough. No change.</p>

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1451	Anna Stocks (Jasbir Kaur)	WCC Archaeology	NA	ED3	Supports the need for conversion of a building for employment purposes being subject to its historic or architectural merit being suitable for the proposed use.		Support noted
1909	Paul Hill	RPS	St Modwen	ED3	Policy should be slightly amended to allow for the provision of employment provisions on allocated sites which do not form part of those sites listed on page 48 or fall with the urban area of Rugby. For example, as included within the comments for a revised policy DS10, employment provision on the Lodge Farm site is an important part of providing a vibrant and mixed community. It is necessary therefore to ensure that this policy reflects that employment provision on such sites and does not cause complications at the Development Management stage.	The first sentence of the policy should be amended as follows: With the exception of those sites allocated for employment purposes in this Local Plan, or with a current B use class, <u>or employment provision included as part of a mixed use within strategic sites</u> , employment development will not be permitted outside the Rugby urban area except in the following circumstances:	The Local Plan target allows for flexibility in supply to deliver employment land requirements based on consideration of forecast jobs growth, increases to resident labour supply, and projections of past take-up rates of employment land. Policy is formulated in relation to the evidence base and is considered to be sound. The Local Plan sets out how completions, existing supply and proposed new allocations meet this target and therefore no further employment land allocations are considered necessary.
1928	Tony Collins	Collins and Coward Ltd	Moto Hospitality Ltd	ED3	Policy ED3 should allow a further exception to allow for MSAs (motorway service areas)		Proposed Policy ED3 applies to proposals for only B use class development outside the urban area, and not other forms of development. A relatively rare development proposal in Sui Generis use class such as a motorway service area would not be suitable for inclusion in the exceptions to Policy ED3 for assessing general proposals for B use class development.

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1452	Public Health Warwickshire	Public Health Warwickshire		ED1 & ED2	<p>Protecting and encouraging employment in Rugby will have a direct impact in health. A secondary care or mental health facility may be required. Strategies for workers without the need for private motor vehicle should be devised. This should include sustainable modes such as frequent and reliable bus routes and dedicated cycle lanes. Those who use the bus will be likely to walk at least part of the journey, whilst those who cycle will be undertaking an intrinsically healthy commute.</p>		Warwickshire County Council are putting together a Public Transport Strategy. No change to Policies