



RUGBY BOROUGH COUNCIL LOCAL PLAN (2025 – 2042)

**STATEMENT OF COMMON GROUND BETWEEN RUGBY
BOROUGH COUNCIL AND HISTORIC ENGLAND**

APRIL 2026

1. Organisations

- 1.1. Rugby Borough Council (RBC)
- 1.2. Historic England (HE)

2. Introduction

- 2.1. This Statement of Common Ground (SoCG) has been prepared jointly by RBC and HE. It identifies areas of agreement and disagreement between RBC and HE in relation to the Rugby Borough Local Plan (2025-2042) and supporting evidence base.
- 2.2. This statement It has been prepared to demonstrate that RBC and HE have effectively cooperated on strategic planning issues as required by the Duty to Co-operate and the National Planning Policy Framework (NPPF).

3. Duty to Co-operate

- 3.1. As set out in the RBC's Duty to Co-operate Statement, the RBC has engaged with HE throughout the plan-making process.
- 3.2. HE made representations in response to the Issues and Options, Preferred Options (both Regulation 18) and Proposed Submission (Regulation 19) consultations. A list of the points raised by HE, and RBC's responses is provided in the appendix to this statement.

4. Agreed matters

Site 283, Rugby Central Shopping Centre

- 4.1. HE notes that this site now has planning permission and that HE raised concerns regarding the perceived bulk and height of the development put forward at that time – particularly onto North Street. These would remain valid concerns for any development of the site given its sensitive location within the town.
- 4.2. Focus on scale, height and mass in relation to the context of the streetscape within the Conservation Area along North Street remain valid parameters to consider within any scheme and are further relevant as the site partly forms the backdrop to views above several Grade II listed buildings from Church Street and St. Andrew's Churchyard (Grade II*).
- 4.3. Any new scheme on this site should be accompanied by a Heritage Impact Assessment (HIA), taking into account all of the above factors, along with a thorough assessment of potential impacts and any opportunities available to mitigate those impacts.
- 4.4. While HE wishes the above comments to be noted and implemented in any

further development proposals for the site, it is not maintaining an objection to the allocation of the site nor arguing that it is unjustified.

Site 353 (Town Hall, Rugby)

- 4.5. Based on the heritage assessment that has now been completed and will be submitted as part of the plan's evidence base, HE is not maintaining an objection to the allocation of the site nor arguing that it is unjustified.

Other issues raised by HE at Regulation 19 stage

- 4.6. Except as set out under "areas of disagreement" below, HE is content with the responses of RBC to the other points raised in its response to the Regulation 19 consultation, as detailed in the appendix to this statement.

5. Areas of disagreement

Site 121 Land at Walsgrave Hill

- 5.1. As set out in the Appendix, in its response to the RBC's proposed submission local plan HE objected to the allocation of the above site.
- 5.2. Following the close of the Regulation 19 consultation HE has met with RBC and its heritage adviser and has considered additional material prepared by the site promoter of site 121 at the request of RBC. The scope and methodology for the new material was agreed by RBC's heritage adviser, Node. The new material was prepared by the site promoter in response to HE's objection. The purpose of the new material is to provide more detail of how the mitigation strategy for the site could be delivered and to provide greater detail of the proposed country park, which is relevant to understanding public benefits.
- 5.3. The new material includes an updated masterplan and landscape strategy for the site, together with verified views and zone of theoretical visibility mapping. RBC intend this material to form part of the plan's evidence base. Node's involvement advising RBC ensures that RBC is not just taking the site promoter's view but is independently scrutinising their material.
- 5.4. Node has also prepared an addendum to its March 2025 Heritage Assessment for site 121 based on the new material.

RBC's position on site 121

- 5.5. Node's Heritage Assessment Addendum (April 2026) confirms the conclusions of its original March 2025 assessment. In summary, in relation to Coombe Abbey Registered Park and Garden and Conservation Area it states:

"Balancing the nature and extent of potential effects with the demonstrated capacity for their mitigation, we conclude that there is scope for heritage impact to be contained to the "less than substantial harm" category of NPPF. We

anticipate the 'Year 0' (at point of completion) impact would likely be towards the upper end of that spectrum, on account of the prominence of new industrial units in multiple locations, and the legibility of the mitigation measures as being artificial constructions. The level of harm could reduce, and become more geographically focussed, as the mitigation matures, bringing impact into at least the 'moderate less than substantial' bracket, and potentially lower. Such an outcome would, however, be subject to the extent and ambition of mitigation measures matching those of the submitted, illustrative proposals."

5.6. The additional heritage note also highlights the opportunities for enhancements consistent with the objectives of Historic England's HEAN3 guidance and constituting additional public benefits. In particular:

"A significant extension of the area of publicly accessible amenity landscape associated to the Country Park.

- Enhancements of surviving but degraded historic hedgerows and woodland elements within the site, historically associated to the estate landscape.
- Improved pedestrian and cycle links between the Registered Park and Garden and residential areas in the east of Coventry, and potential future connections to the emerging light rail system. Elevating levels of accessibility to the historic landscape that is largely reliant on vehicular access.
- Interpretation opportunities to enable greater understanding of the registered park and garden's significance.
- Securing a long-term, viable use for the grade II listed Walsgrave Hill Farm, as a focal point within both the new development and extended country park landscape."

5.7. RBC considers that there are further public benefits:

- In providing significant new employment opportunities close to the workforce in the city of Coventry, including deprived areas, which can reduce commute distances and deliver opportunities to travel to work by non-car modes;
- To the local economy by expanding the regionally significant industrial cluster on the eastern edge of Coventry, delivering a range of unit sizes including those suitable for start-ups;
- In providing a development in a location where the new Walsgrave A46 junction can facilitate access and the impacts on the wider transport network are shown to be acceptable.
- In delivering of a 'blue light' route for ambulances connecting the new Walsgrave A46 junction with University Hospital Coventry and Warwickshire (UHCW). This will enable ambulances to avoid traffic on the approach to the hospital and was specifically requested by and is

supported by UHCW.

- Facilitation of the future creation of a very light rail route linking Coventry to Ansty Park across the A46, a benefit that is supported by Coventry City Council's transport team.
- Delivery of a small, single-family gypsy and traveller site to help address the significant unmet need for this type of accommodation.

5.8. Overall, RBC considers that the more detailed technical analysis, details of mitigation and details of the new country park support its position that there is potential for the scheme to be compliant with the heritage policies of National Planning Policy Framework, and that the RBC can fulfil its statutory duties within Planning (Listed Buildings and Conservation Areas) Act 1990. Specifically, RBC considers that the public benefits of the scheme can outweigh the less than substantial harm to the significance of the designated heritage assets.

5.9. To further ensure that the scheme delivers the mitigation and public benefits, RBC is proposing the following modifications to the development requirements for site 121 through the examination process:

Reference	Change	Explanation
Page 146. Development site allocations annex for site 121 Land at Walsgrave Hill. First bullet point.	Add the following text to the first bullet point: "Creation of a continuous circa 75ha publicly accessible country park adjoining Combe Abbey County Park. <u>The planning application shall include a detailed country park masterplan for approval.</u> "	To provide additional details of the country park to be secured through the site allocation.
Page 146. Development site allocations annex for site 121 Land at Walsgrave Hill. Eleventh bullet point.	Amend the eleventh bullet point as follows: "Planted boundaries are to be reinforced <u>and woodland planting introduced alongside topographical reprofiling</u> to screen or filters views in and out of the site, particularly <u>in relation to from</u> the registered park and garden and nearby historic farmsteads. <u>This shall be set out in a comprehensive landscape strategy.</u> "	To provide additional detail on the mitigation strategy for the site.

HE's position on site 121

- 5.10. HE maintains that the development of the proposed site allocation for large buildings/warehouses would result in a harmful change to the character of the existing open agricultural landscape associated with the Coombe Abbey complex RPG. It is HE's view that this would cause unwarranted harm to significance which the nationally important Grade II* RPG and the associated listed buildings within it derive from their setting, many of which are highly graded.
- 5.11. In response to the Regulation 19 consultation stage of the Rugby Local Plan, HE objected to on the above grounds and recommended that the site allocation be removed from the Local Plan. However, being aware that the Council would be keen to progress the Plan at this late stage, HE also suggested a modification to revise the potential allocation site to delete the two parcels of the 'developable area' indicated to the west of the heritage assets, which would result in the allocation of a smaller employment area in the northern portion of the site.
- 5.12. The new material prepared by the site promoter (see paras. 5.2 & 5.3 above), does not indicate that development is removed from the area to the west of the heritage assets, but instead includes an updated masterplan proposing two smaller units (Units 601 and 602) in place of one very large building (former Unit 601) in this area. It also includes verified views and zone of theoretical visibility mapping (ZTVs), which have been used to inform a landscape strategy as part of a package of mitigation.
- 5.13. HE considers that without mitigation the proposed warehouse buildings and associated infrastructure would be alien and dominant within this landscape setting and would erode the permeability which allows key features and spatial relationships to be appreciated from multiple vantage points. Furthermore, the development would have an industrialising and urbanising impact – both visually and experientially – extending development beyond Coventry's Eastern Ring Road and deep into the sensitive setting of Coombe Abbey.
- 5.14. With regard to the landscape proposals included in the recently submitted 'Heritage and Landscape Analysis' (April 2026), HE considers that the creation of a new country park would have the potential to harm the significance the registered park derives from its setting. While proposed mitigation and landscape planting may over time soften certain visual effects, these measures do not fully address the fundamental spatial and landscape impacts arising from the subdivision and erosion of the landscape and the introduction of development and infrastructure within an area that currently makes a positive contribution to the significance and setting of the registered park.
- 5.15. With regard to the specific mitigation proposed, HE considers that the introduction of a bund and dense tree buffers would disrupt key views and sightlines out from the RPG and the Conservation Area and diminish



experiential qualities of this agricultural setting by altering the perceived scale of the landscape, making it appear smaller, more enclosed and consequently more fragmented. The cumulative effect of such interventions would be a wholly material change in character, not a minor or reversible alteration.

- 5.16. In terms of the 'heritage benefits' set out in the recent Heritage Assessment Addendum, April 2026, HE considers that these benefits are, in part, intrinsic to the development rather than additional or heritage specific, and that they do not clearly or directly address the identified harm to the significance of Coombe Abbey Park and its setting.
- 5.17. HE considers that the new information from the site promoter, and submitted to the Secretary of State with the Local Plan as part of the Council's evidence base, does not address HE's reasons for objection to the inclusion of the site allocation in the Regulation 19 Plan. Furthermore, HE recommends that the Council looks holistically at future employment provision across Rugby Borough, in order to secure allocations which would sustain and enhance the significance of heritage assets.
- 5.18. Therefore HE is not in agreement with the Council on this issue and considers that as the Council cannot demonstrate that the site can be delivered in a manner which would contribute to protecting or enhancing the historic environment, HE concludes that this site allocation is contrary to the Council's own extant and proposed policies and the national planning policy of the NPPF. HE considers that the site's inclusion in the Local Plan therefore renders the Local Plan unsound.

6. Future joint working

- 6.1. This statement will be updated, if necessary, through agreement between RBC and HE.

7. Signatories

Signature: 	Signature: 
Elizabeth Boden, Historic Environment Planning Adviser, Historic England	Nicola Smith, Strategic Director for Place, Rugby Borough Council
Date: 3 June 2026	Date: 3 June 2026

Appendix: Summary of Historic England representations and RBC responses

Proposed Submission Local Plan (Regulation 19)

Historic England representation (summary)	Council response
Without a heritage assessment for site 283 (Rugby Central Shopping Centre) the plan is not underpinned by relevant up to date evidence and is not justified.	See agreed matters above.
Without a heritage assessment for site 353 (Town Hall, Rugby) the plan is not underpinned by relevant up to date evidence and is not justified.	See agreed matters above. A heritage assessment has now been prepared and shared with Historic England. This will be published when the plan is submitted for examination.
Historic England (HE) notes the presence of some Ridge and Furrow in the proposed allocation 253, Lawford Fields Farm. Therefore we suggest that the advice of the County archaeological advisers are sought and that the area of green space proposed in the southern part of the site may need to be potentially adjusted to maximise preservation of the Ridge and Furrow.	Noted. This can be considered at the pre-app and planning application stage.
Site 81, West of Fosse Way, Stretton-on-Dunsmore. Because of the Roman Fosse Way running through the site HE would suggest including the requirement for the archaeological investigation to inform preservation by design if the Roman Road is present and any associated roadside Roman buildings and/or evidence are present.	RBC will propose a modification to the plan to reflect this recommendation.
Policy C1 Rugby town centre Clause B vii. could be worded to better reflect the guidance of the NPPF by stating "support the conservation and enhancement of heritage buildings and their setting".	RBC will propose an additional (minor) modification to the plan to reflect this recommendation
HE objects to site 121, land at Walsgrave Hill and recommends its removal from the local plan. The development of the allocation for large buildings/warehouses for employment (B2, B8 or E(g) uses) would result in a harmful change in the character of the existing open agricultural landscape associated with the Abbey complex, resulting in harm to the significance the RPG and harm to the significance that the associated listed buildings derive from their setting. Although the development requirements propose mitigation, this mitigation is not clear and convincing justification for the high	See areas of disagreement above

Historic England representation (summary)	Council response
level of harm that is likely to be caused to the significance of the highly graded heritage assets from the development of this allocation.	
Site 121 Walsgrave Hill, Historic England (HE) considers that the appraised impacts of Employment Growth Scenario 1 (Land at Walsgrave Hill) have not been adequately addressed within the SA Report. Specifically, HE note that the scenario is rated worst on the historic environment topic but feel there should be more reference to the Heritage Assessment for the site. HE consider that there is a need to address the impacts of the proposed allocation on the significance of the heritage assets prior to its inclusion within the Local Plan.	See areas of disagreement above

Preferred Options

Historic England representation (summary)	Council response
Pleased to see the historic environment positively focused within the Preferred Option document and responds to many of the comments made at Issues and Options stage.	Noted.
Welcome recent evidence produced in the site selection process, including the <i>Heritage Assessment of local plan site allocations for Rugby Borough Council</i> , March 2025 and Addendum, April 2025, plus the inclusion of heritage in <i>Landscape Sensitivity of Strategic Site Options</i> , March 2025. Note that these have informed Stage 2 Site Options Assessment.	Noted.
Suggest objectives should encompass conservation and the enhancement of the historic environment.	We think we have embedded conservation and enhancement of the historic environment through the plan, and this is reflected elsewhere in the feedback from Historic England. Therefore, a specific objective in relation to this is not needed.

Historic England representation (summary)	Council response
Tabulated responses on site allocations in policies S6 and S7 included.	Fulfilled. These have been incorporated as far as possible, including recommendations from the Heritage Assessments of the local plan sites.
Policy CL1 – policy should recognise the role of existing building stock, and desirability to retrofit, not just deliver new builds at net zero.	Policy CL1 focuses on new buildings because they represent a significant opportunity to ensure that new development contributes to the borough’s net zero ambitions in operation.
Policy CL2 - Consider there should be a heritage criteria in the policy for the assessment of large scale energy production and storage schemes.	We do not consider this necessary. It is not necessary to duplicate these considerations across multiple policies. There are existing heritage and landscape policies (policies D4 and EN2) which apply these considerations to all relevant planning applications.
CL2 – unable to locate on a map.	Resolved: interactive map available on the Council’s webpage.
Policy CL4 – suggest broadening this to reduce energy consumption in existing buildings.	We recognise the benefits of reducing energy consumption in existing buildings, however such a policy can only be applied through the planning system where development proposals are made via a planning application.
Policy C1 – welcome the inclusion of enhancing heritage assets in this policy. Suggest included on the plan.	The plan referenced (included on p33 of the proposed Submission Plan) indicates the locations of proposals noted under policy C1, and other allocation sites. We have not sought to include heritage assets on this plan because this would make the plan too busy and difficult to read.
Policy EN2 – suggest amended wording to paragraph 5.16 to include heritage assets.	Resolved: see page 39, paragraph 5.4

Historic England representation (summary)	Council response
Policy D1 – suggest that this be made clearer in respect of local character, historic built environment and landscape setting.	We think that local character and the historic built environment are specifically addressed in Part Bii of this policy. Landscape setting (existing) is addressed in the 'environment' chapter, and integration of landscape is addressed in D3.
Policy D4 – suggest make clear that this policy refers to both designated and non-designated heritage assets. include reference to setting in clauses A & B, amend clause C to refer to Historic Impact Assessments, and amend para 8.10 to better reflect wording of the NPPF.	Resolved: Clauses A & B refer to setting, Clause C refers to Historic Impact Assessments, and 8.10 amended as recommended.

Issues and Options

Historic England representation (summary)	Council response
Lack of clarity regarding how the historic environment has been considered in the Issues and Options consultation, raising issues of soundness.	Resolved. The Preferred Option consultation and subsequent Submission Plan have sought to interweave heritage throughout, and heritage has been an evident consideration in the site selection process – see above.
Town centre regeneration – heritage should play a key role in town centre regeneration. Heritage assets should be considered in the site selection process, and use Heritage Impact Assessments recommended.	Resolved: heritage has played a role in the site selection process as a whole, including in town centre locations. The use of Heritage Impact Assessments is included in policy D4.
Climate policies should reference the importance of existing building stock, not just new build.	See above in respect of policy CL1 in the Preferred Options document.
Welcome inclusion of the historic environment in the Sustainability Appraisal process, and recommend this is encompassed in future stages of the local plan review.	Resolved: see above regarding the Preferred Option document.