



Historic England

Our ref: PL – 00794393 & PL-00794397

Your ref:

[REDACTED]

15 May 2025

FAO: Development Strategy Team
localplan@rugby.gov.uk

Dear Sir/Madam,

Re: Rugby Borough Local Plan – Preferred Option Consultation, March 2025 and Interim Sustainability Appraisal (SA) Report March 2025

Thank you for consulting Historic England on the Rugby Borough Local Plan Preferred Options and accompanying Sustainability Appraisal Report. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully considered at all stages and levels of the Local Plan.

We note that this consultation follows the Issues and Options Local Plan consultation, published in October 2023. In relation to this **Preferred Options** consultation, we have the following comments:

General Comments

The NPPF is clear that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment (para.203), to ensure that growth options and site allocations avoid harming the significance of both designated and non-designated heritage assets, including effects on their setting. There may also be opportunities to enhance or better reveal the significance of heritage assets (NPPF para. 219), or opportunities to tackle heritage at risk through sensitive development.

Historic England considers that a good Local Plan will offer a positive holistic approach to heritage throughout the whole plan, whereby the historic environment is considered not just as a stand-alone topic, but as an integral part of every aspect of the plan and



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should be interwoven within the entire document. Therefore, we are pleased to see that the historic environment is positively focused within the Preferred Options document, as it is proposed to be included within several topics, such as Climate, Centres, Environment and Design, as well as within a focussed policy on the historic environment and that some of our comments made at the Issues and Options stage have been taken on board.

We also welcome the recent evidence in relation to heritage that has been produced to inform the Preferred Options, namely: the '*Heritage assessment of local plan site allocations for Rugby Borough Council*', March 2025 and *Addendum*, April 2025. We are pleased to see that this assessment has followed the 'Site Selection Methodology' as set out in Historic England's Advice Note 3: *The Historic Environment and Site Allocations in Local Plans*, 2015 (HEAN3).

Likewise, we welcome that the historic environment is a key consideration in the Council's '*Landscape Character Assessment*', January 2025 and that designated heritage assets and cultural heritage features form part of the assessment criteria in the Council's '*Landscape Sensitivity Assessment of Strategic Site Options*', March 2025.

We are also pleased to see that all of the above assessments have been utilised to inform the '*Rugby Borough Stage 2 Site Options Assessment*', March 2025, and thus heritage considerations have been integral to the site selection process of the Local Plan.

Specific Comments

Objectives

Historic England suggests that the Objectives of the Local Plan should also encompass the conservation and enhancement of historic environment.

Strategy

Policy S6 Residential Allocations and Policy S7 Employment Allocations - our tabulated comments on individual site allocations are contained in the attached **Appendix A**. These and your own assessments, highlight a number of designated and non-designated heritage assets that may be affected by the proposed allocations, and we have set out relevant recommendations in relation to further assessments and/or suggested policy improvements.

Climate

Policy CL1 Net Zero Buildings - Historic England considers that the historic built environment has a significant role to play in achieving Net Zero, and therefore also should be considered as part of any climate change policies. The policy as written requires new builds to be 'net zero' but fails to mention the importance of the role of the current building stock in diminishing carbon emissions.





Historic buildings represent an investment of embodied carbon and other resources and demolishing and replacing them requires a significant reinvestment of both energy and the resources required. Retrofitting and restoring the existing building stock has a much lower carbon output and will also contribute to lower carbon emissions over the course of a building's lifespan. The Local Plan should therefore encourage and recognise the benefits of sympathetic restoration, retention, refurbishment and retrofitting of historic buildings and reference should also be made to the importance of regular building maintenance, as the benefits of caring for and re-using historic buildings can lead to energy savings and a reduction in carbon emissions.

Policy CL2 Renewable energy and low carbon technology –

Historic England notes that paragraph 2.5 requires renewable energy development proposals to be considered against other relevant policies of the local plan, including Policy D4 (Historic Environment). However, we consider that the impact on heritage and landscape character should be included as specific policy criteria against which schemes for large-scale energy generation and storage will be considered.

We note that the Policies Map will show suitable areas for wind turbine development, but that such a map could not be found anywhere within the Preferred Options document. If further work is to be undertaken on this issue, then to ensure that the historic environment is fully considered, we advise undertaking the process of the 'Site Selection Methodology' as set out in Historic England's Advice Note 3: *The Historic Environment and Site Allocations in Local Plans*, 2015 (HEAN3), to ensure that the plan is positively prepared.

We would also direct you to our guidance on commercial renewable energy: Historic England Advice Note 15 (February 2021) '*Commercial Renewable Energy Development and the Historic Environment*':

<https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/heag302-commercial-renewable-energy-development-historic-environment/>

Policy CL4 Climate Adaptation –

We note that paragraph 2.10 refers specifically to 'new development', and we suggest that the policy is broadened to encompass reducing energy consumption in existing buildings, as this is a key factor in achieving net zero.

Historic England has a wealth of published guidance in relation to the historic environment and energy and carbon efficiency. In particular we refer you to the following:

our recently published Historic England Advice Note 18 (July 2024) '*Adapting Historic Buildings for Energy and Carbon Efficiency*':





<https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/>

and we would also recommend reference to:

<https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/>

Centres

Historic England considers that the historic built environment should play an active role when considering town centre regeneration, and regeneration more broadly. Rugby Borough has many listed buildings, including several within the identified town and local centres.

Policy C1 Rugby Town Centre – we welcome that the enhancement of heritage buildings is included within the policy as a placemaking principle. However, we suggest that it would be useful to show these heritage buildings/assets on the accompanying plan on page 30.

Environment

Policy EN2 Landscape Protection – we welcome the policy position with reference to the setting of a heritage asset within clause C and we suggest that paragraph 5.6 could include heritage assets as an example of character. Therefore, we suggest the following amendment to the wording of this paragraph:

‘These elements could include for example habitats (woodland etc), trees and veteran trees, hedgerows and heritage assets (e.g. ridge and furrow) that combine to provide a distinctive character that is the product of the interaction between human activity and the natural environment’.

Design

Policy D1 Well-designed places - the NPPF is clear that a strategic design policy should be grounded in an understanding and evaluation of each area’s defining characteristics (paragraph 132). Historic England therefore considers that this policy could be made clearer with regard to local character, the historic built environment, and landscape setting considerations for development.

Historic England supports the use of Design Codes and Design Guides to inform development and ensure that it is responsive to its setting. Information on good practice for design and on Historic England’s role in encouraging and facilitating new development which is based on an understanding of each site’s unique history, character and context, can be found at:

<https://historicengland.org.uk/advice/planning/design-in-the-historic-environment/>





Policy D4 Historic Environment - we suggest that the policy makes clear that it refers to both designated and non-designated heritage assets. We also suggest that clauses A and B should be amended to refer to the setting of a heritage asset, such that the first sentence of clause C is amended to add after heritage asset '*including any contribution made by its setting,*' to better reflect the guidance of the NPPF.

We note that clause C requires 'historic building reports' and we suggest amending this to 'Heritage Impact Assessments', which have a broader scope and would encompass the host building it's setting, as well as other buildings/assets and their setting also.

We also suggest that paragraph 8.10 could be re-worded as '*...heritage asset, including any contribution made by its setting, in the development process*', to better reflect the guidance of the NPPF.

Sustainability Appraisal (SA) Interim Report

Historic England welcomes that the historic environment has been incorporated as part of the Sustainability Appraisal process and is pleased to see consideration of different heritage assets, including heritage at risk, within the Borough.

We also welcome that the Council's evidence base in relation to heritage, namely the '*Heritage assessment of local plan site allocations for Rugby Borough Council*', March 2025 and *Addendum*, April 2025, have been utilised in the assessment of likely impacts on the historic environment.

Historic England welcomes the inclusion of the SA objective of protecting and enhancing the historic environment and we are pleased to see that the various growth scenarios have been assessed in relation to impacts on the historic environment and also in relation to impacts on landscape and townscape character.

With regard to the '*Draft plan appraisal*' we would agree with the assessment of proposed site allocations 337 and 129 being sensitive in relation to the historic environment and that for sites 315 and 316 a site-specific policy should be considered (as the plan proposes) and we refer you to our specific comments on these sites in the attached **Appendix A**.

To assist your preparation of the SA in relation to the assessment of effect upon the historic environment we refer you to Historic England's Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, 2016 (HEAN8):

[Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment](#)





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Historic England would be happy to provide further comments as the Rugby Borough Local Plan review is progressed over the coming months. We should like to stress that the above opinion is based on the information provided by the Council in their consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation, or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.

We hope that the above comments will assist, but if you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours faithfully,

[Redacted signature block]



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APPENDIX A – Rugby Borough Local Plan Preferred Options (Regulation 18) – Proposed Site Allocations

Site ID & name Use & estimated housing capacity	Historic England (HE) comments
<p>337</p> <p>West Farm & Home Farm, Brinklow</p> <p>Residential – 75 dwellings</p>	<p>HE notes '<i>Development requirements</i>' include restoration and re-purposing of the historic agricultural buildings. HE welcomes this approach as we consider that the retention of the Listed Buildings and curtilage listed barns is key here, as they make a positive contribution to the significance of the Listed Buildings and the Brinklow Conservation Area. Development should also enhance the setting of the Grade II* Church of St. John the Baptist and the Conservation Area and to respond to the grain of the historic development within the site.</p> <p>We also note that the site includes some ridge and furrow in the east part of the site and an embankment for the Old Oxford Canal with a section still in water just to the north of the proposal site. The ridge and furrow is part of the setting of Brinklow Castle preserving evidence of the medieval open field system. We welcome the inclusion of the better preserved part of the ridge and furrow in the green space and this should be excluded from construction traffic, storage or use during construction and landscaping operations to ensure its preservation. We recommend that the views of the County Council archaeological advisor are sought, in particular in relation to the conservation of the Old Oxford Canal embankment which should be conserved in any forthcoming scheme to ensure the section of waterfilled canal is retained.</p> <p>We note that this site has been reviewed as part of the '<i>Heritage Assessment of local plan site allocations for Rugby Borough Council</i>', 2025 and we support the recommendations for 'Avoiding harm and maximising enhancements' listed. HE recommends that these are carried through into the 'Development requirements' of the site specific policy (particularly in relation to the preservation of the historic earthworks, including the ridge and furrow and canal embankment) and additionally we suggest that a full planning application, rather than an outline, be required for this site.</p>



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315 Land south of Rugby Road, Brinklow Residential – 340 dwellings	HE notes that the eastern part of the site contains well preserved ridge and furrow; part of the medieval open field system associated with Brinklow Castle and its medieval settlement. It contributes to the significance of both the Castle and the settlement (Brinklow Conservation Area) and we recommend that this should be preserved in any forthcoming scheme within the green space. We suggest that this should be added to 'Development requirements' of the site specific policy.
129 North of Lilbourne Road, Clifton upon Dunsmore Residential – 60 dwellings	HE notes that the site lies close to the Clifton Upon Dunsmore Conservation Area and within close proximity to Clifton Manor and The Old Hall, both Grade II listed buildings. We note that this site has been reviewed as part of the ' <i>Heritage Assessment of local plan site allocations for Rugby Borough Council</i> ', 2025 and we support the recommendations for 'Avoiding harm and maximising enhancements' listed. HE recommends that all five of these are carried through into the 'Development requirements' of the site specific policy in order to ensure that development of this sensitive site is responsive to the historic environment.
202 Newton Road, Clifton upon Dunsmore 80 dwellings	HE - No concerns
307 North Road, Clifton upon Dunsmore 10 dwellings	HE - No concerns



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341 Land south of Coventry Road, Dunchurch 180 dwellings	HE - No concerns
90 Homestead Farm, Coventry Road, Dunchurch 30 dwellings	HE - No concerns
316 Land at Long Lawford 400 dwellings	<p>HE notes that whilst there are no designated heritage assets within the site the top NW corner of site wraps around Grade II Avon Lodge.</p> <p>We note that this site has been reviewed as part of the '<i>Heritage Assessment of local plan site allocations for Rugby Borough Council</i>', 2025 and we agree with the comments that whilst mitigation is strongly encouraged, it is unlikely that harm to the setting of the Listed Building can be wholly avoided and that development should be informed by a Heritage Assessment of the 19th century working buildings, prior to the determination of a planning application. We also support the recommendations for 'Avoiding harm and maximising enhancements' listed. HE recommends that all four of these are carried through into the '<i>Development requirements</i>' of the site specific policy in order to ensure that development is responsive to the historic environment, particularly the provision of open space to create a buffer to the rear of the farmhouse and working buildings, as part of the mitigation measures.</p>
75 Lea Crescent, Newbold on Avon 20 dwellings	HE - No concerns



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<p>87</p> <p>Hill Crest Farm, Newton</p> <p>25 dwellings</p>	<p>HE - No concerns</p>
<p>62</p> <p>Morgan Sindall House, Rugby Town Centre</p> <p>90 dwellings</p>	<p>HE notes that whilst there are no designated heritage assets within the site the Rugby Conservation Area lies to the South & West, containing many Listed Buildings, including the Grade II* Church of St. Andrew.</p> <p>HE raises concerns regarding the potential impact of re-development on the setting of the church and Conservation Area, especially if the existing building is demolished and a taller building developed here. We note that the 'Development requirements' include the possible re-use of parts of the existing building and this is supported. A Heritage Assessment should also be required prior to determination of any planning application and a Certificate of Immunity would confirm the significance of this 1960s brutalist building and establish parameters of development.</p>
<p>332</p> <p>Former Rugby Borough Council Depot, Albert Street, Rugby</p> <p>25 dwellings</p>	<p>HE notes that whilst there are no designated heritage assets within the site nos. 68 and 70 Albert Street, located immediately north east of the garage which abuts site to north east, are Grade II Listed Buildings.</p> <p>We note that the 'Development requirements' include possible building heights of five storeys towards the eastern end of the site, which would be right against the Listed Buildings and suggest that five storey building heights would be better located at the western end of the site, where there are a few existing five storey buildings in close proximity.</p>
<p>122</p> <p>Land at Fenley Fields, Old Laurentian Rugby Club, Cawston</p> <p>80 dwellings</p>	<p>HE - No concerns</p>



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40 Land east of Kilsby Lane, Hillmorton, Rugby 125 dwellings	<p>HE notes that whilst there are no designated heritage assets within the site, the Grade II Wharf Farmhouse & Grand Union & Oxford Canals Conservation Area lie to south. We consider that the setting of canal CA is particularly important as a boundary is shared with the canal. The towpath along the canal is very rural and a good relationship between the canal and development should be encouraged.</p> <p>HE notes that the '<i>Development requirements</i>' include that development should come forward in accordance with a masterplan which is produced in consultation with the Canal & River Trust and we are supportive of this approach.</p> <p>We also suggest that a connection between the canal CA and the Hillmorton Locks CA should be considered when any review of these CAs are undertaken in the future.</p>
334 Land off Barby Lane, Hillmorton, Rugby 380 dwellings	HE - No concerns
59 Newton Manor Lane, Brownsover 240 dwellings	HE - No concerns
338 Land south of Crick Road, Houlton 250 dwellings	HE - No concerns



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100 Land at High Street, Ryton-on-Dunsmore 35 dwellings	HE - No concerns
6 Land east of Fosse Way opposite Knob Hill, Stretton-on-Dunsmore 3 dwellings	HE - No concerns
81 Land west of Fosse Way, Stretton-on-Dunsmore 40 dwellings	HE notes that whilst there are no designated heritage assets within/near the site the projected course of the Roman Road (Fosse Way) which linked the Roman towns of Corinium (Cirencester) and Venonis (High Cross) runs through the site. HE recommends that any forthcoming proposal should identify its survival and any associated Roman archaeology at an early stage and seek to preserve it in proposal in accordance with local and national policy. Your County archaeological advisor will be able to advise you further.
134 Land north of Plott Lane, Stretton-on-Dunsmore 125 dwellings	HE - No concerns



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39 Dyers Lane, Wolston 15 dwellings	HE - No concerns
84 South of Leicester Road, Wolvey 60 dwellings	HE notes that whilst there are no designated heritage assets within the site the Grade II* Church of St. John the Baptist lies to south-west and there is the potential for substantial harm to the setting of the church. We also consider that the connectivity between the proposed site and the town is key and should be well thought through. HE recommends that a Heritage Impact Assessment should be undertaken prior to allocation and that the findings of this should inform the development requirements of a site specific policy.
96 Land south of Coventry Road, Wolvey 500 dwellings	HE - No concerns
309 Land north of B4109, Wolvey 150 dwellings	HE - No concerns



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64 Coton Park East, Rugby 115,000m ² employment floorspace	HE - No concerns
17 South west Rugby employment phase 2 130,000m ² employment floorspace	HE - No concerns
14 North of Ansty Park 75,000m ² employment floorspace	HE - No concerns
95 Crowner Fields Farm and Home Farm, Hinckley Road, Ansty 275,000m ² employment floorspace & 18,000m ² office space	HE - No concerns



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<p>328</p> <p>Prologis Park West and Mountpark, Ryton-on-Dunsmore</p> <p>350,000m² employment floorspace</p>	<p>HE notes that whilst there are no designated heritage assets within the site there is the Scheduled Monument (SM) Pit alignments N of Bubbenhall village to south-west and Bubbenhall Conservation Area containing a number of GII Listed Buildings further to the south.</p> <p>Although the pit alignment is suggested as east-west in alignment, there can be multiple pit alignments, and these features can be long (sometimes a few kilometres long). We therefore recommend a Heritage Impact Assessment (HIA) and geophysical survey are undertaken prior to allocation to inform conservation requirements.</p> <p>We also recommend that a HIA and a Landscape and Visual Impact Assessment (LVIA) are undertaken in relation to the impact on the Conservation Area and Listed Buildings prior to allocation.</p> <p>The findings of these studies should then inform the development requirements of a site specific policy.</p>
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