

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 **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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Elizabeth"/>	<input type="text"/>
Last Name	<input type="text" value="Boden"/>	<input type="text"/>
Job Title	<input type="text" value="Historic Environment Planning
Adviser"/>	<input type="text"/>
(where relevant) Organisation	<input type="text" value="Historic England"/>	<input type="text"/>
(where relevant) Address Line 1	<input type="text" value="Historic England, Granville
Street, Birmingham, UK"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="██████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address	<input type="text" value="████████████████████"/>	<input type="text"/>
(where relevant)		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	Centres C1 Rugby town centre	Policies Map	<input type="text"/>
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Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

(2) is Sound

(3) complies with the
Duty to co-operate

<input type="text"/>
Yes
<input type="text"/>

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Historic England (HE) considers that 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".

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

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Historic England (HE) suggest the following wording for Policy C1 Rugby town centre Clause B vii. "support the conservation and enhancement of heritage buildings and their setting", in order to better reflect the wording of the NPPF.

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Historic England (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.

At Regulation stage HE recommended that any forthcoming proposal should identify the survival of this Roman Road and any associated Roman archaeology at an early stage and seek to preserve it in proposal in accordance with local and national policy and that the County archaeological advisor would be able to advise further.

HE is pleased to see that the updated development requirements for the site now include

proactive archaeological investigation to inform the mitigation strategy.

However, HE would also 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.

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

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Historic England (HE) suggests a modification to clause 7 of the development requirements for Site ID:81, Lawford Fields Farm, to include 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.

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Name or Organisation:

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Site ID

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This representation relates to the Sustainability Appraisal (SA) of the Rugby Borough Local Plan, SA Report, December 2025.

(Please refer also to our representation for Site 121 Land at Walsgrave Hill, where HE is objecting to the inclusion of this site within the Regulation 19 Plan).

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.

Table 6.2 'Employment land growth scenarios appraisal' clearly shows Scenario 1 as having

been ranked 3 (worst) for the Historic Environment topic.

However, the discussion of this in paragraph 6.3.3, whilst referring to the heritage assets that would be affected, including those of the highest grades, merely states "However, there is understood to be good potential to avoid and mitigate impacts".

No mention is made of the Council's Heritage Assessment for the site, which at p.131 states that "As a minimum, more detailed heritage, landscape and visual assessment should be provided.....prior to any decision making as to the developable area. This is on account of the high significance of the heritage assets affected, and high potential for impacts".

This is in stark contrast to the attention drawn to the Heritage Impact Assessment for Scenario 3: North of Houlton, which is given a better ranking for its impacts on the historic environment, but a much more detailed commentary.

HE notes the conclusion of the section on the Historic Environment topic in paragraph 6.3.3, which states that "there is a need to flag a concern with Walsgrave Hill given the significance of the designated assets ahead of consultation on mitigation".

Continued below....

Continued.....

However, HE disagrees with this statement, as we 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, as we have stated in our representation relating to Site 121 Land at Walsgrave Hill.

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

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Historic England considers that further explanation of the potential impacts of employment land growth Scenario 1 on the historic environment is required within the SA Report to ensure that this meets the requirements of the Directive and Legislation in relation to heritage.

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Historic England objects to the inclusion of the proposed employment site allocation 121 'Land at Walsgrave Hill' in the Local Plan for the reasons set out below.

The site lies adjacent to the Grade II* Coombe Abbey Registered Park and Garden (RPG) and Coombe Abbey Conservation Area containing Grade I Coombe Abbey and many associated Grade II listed buildings and structures. The site itself contains Grade II Walsgrave Hill Farmhouse and the Grade II Hungerley Hill Farmhouse and associated Grade II listed buildings are situated on opposite side of A46 at most southerly tip of site.

The significance of the Coombe Abbey RPG lies in its connection with the surrounding

pastoral landscape, as well as with heritage assets, including the Scheduled Monument, the Listed buildings, and the Conservation Area.

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.

HE notes that the Council's Heritage Assessment for the development of the proposed allocation includes key concerns as "the further encroachment of modern development into the setting of Coombe Abbey and the historic farmsteads, and the erosion of the tranquil setting of the park which is a primary feature of its significance".

Whilst HE notes that the heritage assessment recommends several specific mitigation measures in relation to heritage and that these have been carried through into the development requirements for Site 121, we nevertheless consider that this mitigation is not clear and convincing justification for the high level of harm that is likely to be caused to the significance of the highly graded heritage assets from the development of this allocation.

Overall therefore, HE considers that the development of the proposed employment allocation would cause unwarranted harm to significance which the nationally important Grade II* Registered Park and Garden of Coombe Abbey and the associated listed buildings within it derive from their setting, and HE therefore recommends that this site is removed from the Local Plan.

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

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In order that the Plan be made sound, Historic England considers that the removal of the proposed employment allocation site ref:121 'Land at Walsgrave Hill' is necessary.

As this site is a new addition at this Regulation 19 stage, and we appreciate the Council will be keen to progress its Plan, an alternative modification would be to revise the potential allocation site to remove the two parcels of 'developable area' indicated to the west of the heritage assets to result in a smaller site to the north, including a green buffer as set out on the indicative information provided as part of the consultation.

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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.

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Possible modification may be required to site 253, Lawford Fields Farm, as once the advice of the County archaeological advisers has been obtained in relation to the Ridge and Furrow present on the site, the area of open space may need to be adjusted to encompass the Ridge and Furrow in order to maximise the preservation of this heritage asset.

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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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Elizabeth"/>	<input type="text"/>
Last Name	<input type="text" value="Boden"/>	<input type="text"/>
Job Title	<input type="text" value="Historic Environment Planning
Adviser"/>	<input type="text"/>
(where relevant) Organisation	<input type="text" value="Historic England"/>	<input type="text"/>
(where relevant) Address Line 1	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Telephone Number	<input type="text" value="[REDACTED]"/>	<input type="text"/>
E-mail Address	<input type="text" value="[REDACTED]"/>	<input type="text"/>
(where relevant)		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph		Local Plan Policy	Strategy S6 Residential allocations	Policies Map	
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Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

(2) is Sound

(3) complies with the Duty to co-operate

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.

Historic England (HE) has previously welcomed the heritage assessments for the proposed site allocations to assess the impact of development on the significance of designated and non-designated heritage assets and their settings.

However, without a heritage assessment for site 283 (Rugby Central Shopping Centre) the Plan is not underpinned by relevant and up-to-date evidence and therefore is not justified and cannot be deemed sound.

HE considers that as proposed site allocation 283 was not included within the October 2025 Heritage Review document it is not possible to understand what heritage analysis has taken

place to inform its selection and inclusion within this latest iteration of the Local Plan. Although, we note that there is an extant permission for re-development of the site (<https://planning.agileapplications.co.uk/rugby/application-details/34839>).

Notwithstanding the above, in line with HE's guidance on the historic environment significance and setting (HEAN12 & GPA3), and as per the approach taken in the October 2025 Review document, we would expect to see a thorough assessment of relevant heritage context, potential impacts and any opportunities available to mitigate those impacts, for any new scheme on the site.

Whilst HE considers that residential development at the site could, in principle, be acceptable, we have previously raised concerns on planning applications in both 2022 and 2023, regarding the perceived bulk and height of the development put forward at that time - particularly onto North Street - and these would remain valid concerns for any development of the site given its sensitive location within the city.

Continued below.....

Reasons continued.....

Focus on scale, height and mass in relation to the context of the streetscape within the CA 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*). All of the above factors should be considered within the heritage assessment.

(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.

In relation to the proposed site allocation 283 Rugby Central Shopping Centre, HE considers that residential development at the site could, in principle, be acceptable but we strongly suggest that further work be undertaken in respect of the historic environment prior to allocation to ensure that the level of development sought at the site could be achieved whilst minimising harm to the historic environment.

(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)

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:

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.

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-notice>

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 **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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Elizabeth"/>	<input type="text"/>
Last Name	<input type="text" value="Boden"/>	<input type="text"/>
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Adviser"/>	<input type="text"/>
(where relevant) Organisation	<input type="text" value="[REDACTED]"/>	<input type="text"/>
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Post Code	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Telephone Number	<input type="text" value="[REDACTED]"/>	<input type="text"/>
E-mail Address	<input type="text" value="[REDACTED]"/>	<input type="text"/>

(where relevant)

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph

Local Plan Policy

Strategy S6 Residential allocations

Policies Map

Site ID

353

4. Do you consider the Local Plan:

(1) is Legally compliant

(2) is Sound

(3) complies with the Duty to co-operate

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.

Historic England (HE) has previously welcomed the heritage assessments for the proposed site allocations to assess the impact of development on the significance of designated and non-designated heritage assets and their settings.

However, without a heritage assessment for site 353 (Town Hall, Rugby) the Plan is not underpinned by relevant and up-to-date evidence and therefore is not justified and cannot be deemed sound.

Historic England considers that as proposed site allocation 353 was not included within the

October 2025 Heritage Review document it is not possible to understand what heritage analysis has taken place to inform its selection and inclusion within this latest iteration of the Local Plan.

In line with Historic England's guidance on historic environment significance and setting (HEAN12 & GPA3), and as per the approach taken in the October 2025 Review document, we would expect to see a thorough assessment of relevant heritage context, potential impacts and any opportunities available to mitigate those impacts.

Views of St. Andrew's Church Spire (Grade II*) rising above the existing Town Hall building are currently experienceable from Newbold Road when approaching the city centre from the north, and so scale and height will likely be relevant considerations in this context.

Although it appears Benn Hall will be retained as part of the site's redevelopment, there still may be opportunities through re-development to improve the setting of the Lawn (Grade II) and The Retreat (Grade II) when approaching them from the south along Park Walk and such enhancements should be considered within the heritage assessment.

(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.

In relation to the proposed site allocation 353 Town Hall, Rugby, HE considers that residential development at the site could, in principle, be acceptable but we strongly suggest that further work be undertaken in respect of the historic environment prior to allocation to ensure that the level of development sought at the site could be achieved whilst minimising harm to the historic environment.

(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.

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

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