



RUGBY BOROUGH COUNCIL LOCAL PLAN (2025 – 2042)

STATEMENT OF COMMON GROUND BETWEEN RUGBY
BOROUGH COUNCIL AND NATURAL ENGLAND

MARCH 2026

1. Organisations

- Rugby Borough Council (RBC)
- Natural England (NE)

2. Introduction

2.1. This Statement of Common Ground (SoCG) identifies areas of agreement and disagreement between RBC and NE in relation to the Rugby Borough Local Plan (2025-2042) and supporting evidence base. This statement has been prepared to assist the examination of the plan and covers the administrative area of RBC.

2.2. Rugby borough is located to the east of Coventry on the eastern edge of Warwickshire and borders the counties of Leicestershire and Northamptonshire.

2.3 RBC has fully engaged with NE on the development of its Local Plan from the outset. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, NE has been formally consulted at every stage of consultation on RBC's new local plan together with its accompanying Sustainability Appraisal and the Habitat Regulations Assessment. NE made representations to the Regulation 18 stages of consultation on the local plan.

2.4 The Council's Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes.

3. Strategic Matters

Areas of agreement

3.1 There has been constructive engagement between RBC and NE in the preparation of the emerging local plan, and NE considers that the duty to cooperate has been complied with.

3.2 Natural England has reviewed the Habitat Regulations Appropriate Assessment and considers it to be sufficient.

3.3 Natural England has reviewed the sustainability appraisal.

3.4 The plan's evidence base included ecological constraints assessment of sites: <https://www.rugby.gov.uk/w/local-plan-evidence-base#climate-and-environment> .

3.5 In its responses to Regulation 18 consultations Natural England identified the most sensitive locations proposed through the plan as Ansty Business Park expansion/A45 Walsgrave Junction (sites 121 and 14) and the safeguarded land

within the South West Rugby allocation (site 17). Since then the quantum of development at the South West Rugby allocation has been reduced.

3.6 In relation to these more sensitive sites, further detailed ecology work will need to be undertaken at planning application stage. Consider any potential recreational pressures that may emerge on Draycote Meadows SSSI for Policy S8.

Areas of disagreement

3.7 None identified.

4. Further Joint Working

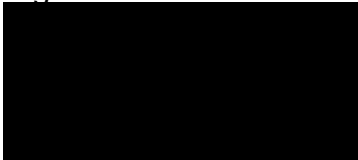
4.1. This Statement of Common Ground will be kept up to date through continuous engagement and cooperation between RBC and NE.

5. Monitoring

5.1 This Statement will be maintained by RBC and updated as necessary with NE.

5.2 RBC will continue to work with NE beyond the adoption of its local plan for the monitoring and implementation of the plan.

6. Signatories

Signature: 	Signature: Phil Burton, Senior Officer in the West Midlands Sustainable Development Team. Natural England.
	Nicola Smith, Chief Officer Growth and Investment, Rugby Borough Council.
Date: 6 th March 26	Date:

Appendix: Summary of Natural England representations and RBC responses

Preferred Option Consultation

	Natural England representation (summary)	Council response
1.	Response to be read in conjunction with the Issues and Options response letter. Points raised at Issues and Options stage will not be repeated here.	Noted. Representations made at Issues and Options stage are included below.
2.	<p>The strategy for allocating land for development should:</p> <ul style="list-style-type: none"> • avoid protected sites and apply the biodiversity mitigation hierarchy (NPPF 180a) • give great weight to conserving and enhancing designated landscapes • avoid the loss of best and most versatile agricultural land. <p>Selecting sites and setting design principles for their delivery should conserve and enhance the natural environment. This includes considering potential impacts and opportunities set out in the HRA, SEA/SA and secured through planning policy.</p>	<p>Resolved: the strategy was developed with reference to the following evidence:</p> <ul style="list-style-type: none"> • Ecological Constraints Assessment • Ecological Technical Advice notes <p>Policy EN3 seeks to protect, reinforce and enhance the enhanced landscape sensitivity of the Rainsbrook Valley.</p> <p>Best and most versatile agricultural land is considered in the stage 2 site assessments where relevant.</p> <p>The HRA and SA have informed site selection, and design principles are included in the plan annex.</p>
3.	<p>An appropriate evidence base should be used to support the selection of sites and inform the policies for their delivery. This should include:</p> <ul style="list-style-type: none"> • Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. • Soil surveys and mapping (Agricultural Land Classification available on Magic maps) • ecological surveys, green infrastructure and biodiversity opportunity mapping. 	<p>Resolved: The evidence base was published at 'preferred options' stage and has been updated for the proposed Submission Plan. This includes:</p> <ul style="list-style-type: none"> • Landscape Character Assessment (2025) • Landscape Sensitivity Assessments (larger and smaller sites) (2025) • Agricultural land Classification considered in the Stage 2 Site Assessments • Ecological Constraints Assessment • Ecological Technical Advice notes

	Natural England representation (summary)	Council response
		<ul style="list-style-type: none"> Warwickshire, Coventry and Solihull Sub-regional Green Infrastructure Strategy
4.	<p>Natural England broadly agrees with the removal of sites from allocation which were highlighted in our previous response including the most notable and sensitive to development:</p> <ul style="list-style-type: none"> <ul style="list-style-type: none"> Ansty Business Park expansion A46 Walsgrave, within the IRZ for Combe Pool SSSI. (Particularly site ref: 121 Land at Walsgrave Hill). Prologis Park Ryton expansion, within the IRZ for Brandon Marsh and Ryton Wood SSSIs. (All sites at Ryton require full assessment within the SEA). Safeguarded land within the South West Rugby allocation, and A45/A4071 junction, are within the IRZ for Draycote Meadows SSSI. 	<p>Prologis Park Ryton expansion has been removed as an allocation since the Preferred Option consultation.</p> <p>The other two sites referenced are included as allocations in the submission plan, and site 121, Land at Walsgrave Hill has been proposed for allocation in addition. It is acknowledged that these sites lie within IRZs of SSSIs. This is noted in the stage 2 site assessment.</p>
5.	<p>The Local Plan should set criteria-based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites.</p>	<p>Resolved: refer to policy EN1.</p>
6.	<p>Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development.</p>	<p>Resolved: SSSIs are included on the policies maps including the interactive version.</p>
7.	<p>Designated sites should be protected and, where possible, enhanced. The direct and indirect impacts of proposed development on designated sites should be considered, including impacts on water quality/supply and the impacts on air quality from increased traffic, intensive agriculture or industrial developments.</p>	<p>Resolved: refer to policy EN1, also EN8 (environmental protection) and EN9 (air quality).</p>

	Natural England representation (summary)	Council response
8.	Criteria-based policies to guide development should include application of the mitigation hierarchy and how the direct, indirect, and cumulative impacts of development on designated sites will be addressed.	Resolved: see policy EN1. Clause A specifically refers to the mitigation hierarchy.
9.	Natural England welcomes the submission of a HRA in support of the Local Plan process, particularly the assessment of likely significant effects to The Humber Estuary SAC and The Severn Estuary / Môr Hafren SAC Designated Sites. Regarding site allocation mitigation and avoidance measures identified through the HRA should be secured through policies in the Plan. Where mitigation or avoidance is not possible the site should not be allocated.	Resolved: A Habitats Regulations Assessment (HRA) has been produced for Regulation 19.
10.	Natural England welcomes the submission of a SEA/SA in support of the Local Plan process. Natural England notes however, that the SA (SEA) interim report does not contain any assessment of the potential effects of the plan on designated sites , such as Sites of Special Scientific Interest (SSSIs). It should outline proposals to protect and enhance biodiversity, including designated nature conservation sites (internationally, nationally and locally designated sites of importance for biodiversity). The direct and indirect impacts of proposed development on designated should be considered, including impacts on water quality and the impacts on air quality from increased traffic, intensive agriculture or industrial developments.	Resolved: Please see the ecology sensitivity assessments prepared for sites, the level 2 water cycle study and the HRA appropriate assessment which consider these points.

Issues and Options

	Natural England representation (summary)	Council response
1.	Natural England understands that currently the suggested locations are	Some allocation sites are within an IRZ of a SSSI. Where this is the case, this

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	<p>vary broadly defined. However, please take into consideration the locations which are within the impact risk zones (IRZ) of several Sites of Special Scientific Interest (SSSI).</p> <ul style="list-style-type: none"> • The most notable and sensitive to industrial developments are: <ul style="list-style-type: none"> • Ansty Business Park expansion/A45 Walsgrave Junction, within the IRZ for Combe Pool SSSI. • Prologis Park Ryton expansion, within the IRZ for Brandon Marsh and Ryton Wood SSSIs. • Safeguarded land within the South West Rugby allocation, and A45/A4071 junction, are within the IRZ for Draycote Meadows SSSI. 	<p>is noted in the stage 2 site assessment.</p>
2.	<p>The Local Plan should set criteria-based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites.</p>	<p>Resolved: refer to policy EN1</p>
3.	<p>Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development.</p>	<p>Resolved: SSSIs are included on the policies maps including the interactive version.</p>
4.	<ul style="list-style-type: none"> • Designated sites should be protected and, where possible, enhanced. The direct and indirect impacts of proposed development on designated sites should be considered, including impacts on water quality/supply • and the impacts on air quality from increased traffic, intensive agriculture or industrial developments. <p>Criteria-based policies to guide development should include application of the mitigation hierarchy and how the direct,</p>	<p>Resolved: see policy EN1. Also CL3 (water supply, quality and efficiency), EN9 (air quality).</p>

	Natural England representation (summary)	Council response
	indirect, and cumulative impacts of development on designated sites will be addressed.	
5.	<ul style="list-style-type: none"> Site selection must also be informed by the relevant environmental assessments. These are: Sustainability Appraisal incorporating Strategic Environmental Assessment: it should be clear how this has informed and provided justification for the sites selected for allocation assessed against reasonable alternatives. Recommendations and findings from the assessments should also be used to inform mitigation measures and design principles for the allocated sites. Habitats Regulations Assessment: mitigation and avoidance measures identified through the HRA should be secured through policies in the Plan. Where mitigation or avoidance is not possible the site should not be allocated. 	Resolved. A Sustainability Appraisal has been prepared to inform the preparation of the plan. A Habitats Regulation Assessment has also been prepared, with mitigation measures included in the plan.
6.	Natural England supports the principle of more housing in the town centre. However, policy should also make provision for transport (NPPF 108), active travel, green infrastructure, and biodiversity net gain (see Q11).	Resolved. The development principles for each site allocation are included in the annex. Active travel requirements and relevant green infrastructure opportunities/constraints are included in these principles. Policies relating to green infrastructure and Biodiversity Net Gain are included in the 'environment' chapter.
7.	In setting an overall strategy to guide development and allocate land the Plan should: conserve and enhance the natural environment, including landscapes and green infrastructure (GI) make as much use as possible of previously developed or 'brownfield' land allocate land with the least environmental or amenity value. It should be recognised that some previously developed land is important for biodiversity as it can contain the open mosaic habitats (dataset), a priority habitat.	Resolved. The strategy has sought to maximise the use of brownfield sites, particularly in Rugby town centre. Policy EN6 (D) seeks to maximise opportunities for canopy cover on town centre sites in addition to other green infrastructure.
8.	Natural England strongly suggests that polices included within the Local Plan should be underpinned by a	Resolved: The Warwickshire, Coventry and Solihull Sub-regional Green Infrastructure Strategy underpins the

	Natural England representation (summary)	Council response
	Green Infrastructure Strategy. The strategy can be used to help embed green infrastructure informed decision making across local authority departments and for sharing with external stakeholders.	plan and is published as part of the evidence base.
9.	The Plan should identify and pursue opportunities for securing measurable net gains for biodiversity. This should include setting a percentage target level of provision of at least 10% net gain, higher targets should be supported by evidence. The plan should include a BNG strategy.	Resolved: see policy EN5.
10.	Care should be taken when allocating land for solar or wind energy production, particularly the effects that such infrastructure can have on designated sites, wildlife sites, habitats and species such as birds and bats. Another consideration is any potential loss, either temporary or permanent, or disturbance to Best and Most Versatile Agricultural Land (BMV).	Resolved: the plan does not allocate sites specifically for wind or solar energy production, though it does identify areas considered suitable for wind turbine development. Policy CL2 sets out the criteria for renewable energy schemes. Part D specifically addresses and most versatile agricultural land.
11.	Welcome the addition of a tree canopy policy, though tree planting may not be appropriate for all sites. A variety of habitats is needed. Where tree planting or habitat creation is undertaken, the specimens should be chosen from native species and a management plan implemented.	Resolved: policy EN6 addresses tree canopy cover, and policy EN5 addresses biodiversity net gain.
12.	Include policies and proposals for nature recovery. Consider wider benefits of carbon capture, flood risk management and enhanced access to nature.	Resolved: policy EN1 requires proposals to contribute towards the Local Nature Recovery Strategy.
13.	In assessing greenspace provision, consideration should be given to the quality and accessibility of space, as well as the various uses that may need separate provision such as children's play space, opportunities for connecting with nature, formal sports areas and facilities for groups with a variety of needs.	Resolved: an Open Space Quality Audit and Open Space Study are published as part of the evidence base.
14.	The Plan should identify, designate and have policies to protect and enhance areas of Local Green	We have not included Local Green Spaces in the plan. These are already included in made and emerging

	Natural England representation (summary)	Council response
	Space that are of particular importance to local communities.	neighbourhood plans across the borough.
15.	The Plan should have policies to maintain and improve access to nature and enjoyment of the countryside. Policies should be in place to protect and enhance public rights of way, access land and national trails. Consider a range of modes.	Site specific connections and PRoWs are referenced in the development principles for each site in the annex, in addition to active travel connections.
16.	Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration.	The plan refers to the Local Nature Recovery Strategy, including for example in policy EN1 (D).
17.	Policies should address water use, promoting the use of sustainable drainage systems (SuDS) and water sensitive design as part of a wider green infrastructure approach. In areas of known water constraint, plans should include policies to manage available resources, such as water efficiency or water reuse measures.	Resolved: see policies CL3 (Water supply, quality and efficiency), and D5 (Sustainable drainage)
18.	The strategy for allocating land for development should: avoid protected sites and apply the biodiversity mitigation hierarchy (NPPF 180a) give great weight to conserving and enhancing designated landscapes avoid the loss of best and most versatile agricultural land. Refers to types of evidence on which site selection should be based.	Resolved: evidence suggestions and studies listed have informed the site selection process. See stage 2 site assessment for further information.