



# **RUGBY BOROUGH COUNCIL LOCAL PLAN (2025 – 2042)**

**STATEMENT OF COMMON GROUND BETWEEN RUGBY  
BOROUGH COUNCIL AND NUNEATON AND BEDWORTH  
BOROUGH COUNCIL**

**MARCH 2026**

# 1. Organisations

- 1.1. Rugby Borough Council (RBC)
- 1.2. Nuneaton and Bedworth Borough Council (NBBC)

# 2. Introduction

- 2.1. This Statement of Common Ground (SoCG) identifies areas of agreement and disagreement between RBC and NBBC in relation to the Rugby Borough Local Plan (2025-2042) and supporting evidence base. This statement has been prepared to assist the examination of RBC's local plan and covers the administrative area of RBC.
- 2.2. Under the Duty to Co-operate the both councils work with a wide range of local authority partners on a range of strategic social, economic and environmental issues, primarily via the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO).
- 2.3. Rugby Borough is located to the east of Coventry City on the eastern edge of Warwickshire and borders the counties of Leicestershire and Northamptonshire. Appendix 1 shows the geographical relationship between the local authorities.
- 2.4. RBC has fully engaged with NBBC on the development of the councils' respective local plans from the outset. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, NBBC has been formally consulted and made representations at every stage of consultation on the RBC's local plan together with its accompanying Sustainability Appraisal and the Habitat Regulations Assessment.
- 2.5. RBC's Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes, together with the joint evidence base studies, undertaken during preparation of RBC's local plan.
- 2.6. This SoCG should be read in conjunction with the Memorandum of Understanding (MoU) to which RBC and NBBC are both signatories (see Appendix 2). The MoU provides the overarching context, whilst this SoCG is intended to provide further detail on localised matters.

# 3. Strategic Matters – Areas of Agreement

- 3.1. That RBC has worked collaboratively with NBBC to ensure that all cross boundary strategic issues have been properly considered and where appropriate reflected in RBC's Proposed Submission Local Plan. Effective and ongoing joint working will continue to be undertaken.

## Housing needs

- 3.2. The housing need position has been set out in the MOU which both NBBC and RBC signed in 2025.
- 3.3. NBBC's Borough Plan Review (2021-2039) was adopted on 10 December 2025 and is therefore an up to date local plan. It sets a housing requirement of 545 dwellings per annum and does not identify any unmet housing need.
- 3.4. RBC does not have any unmet housing need that it is seeking NBBC to meet.

## Employment needs

- 3.5. The Alignment Paper (referenced in the MoU) and later Addendum (November 2025) (issued post agreement of the MoU) are the most up to date jointly prepared evidence documents which set out the employment need for each of the Functional Economic Marker Area authorities.
- 3.6. It is agreed that RBC has identified sufficient supply of employment land to accommodate all the strategic need associated with Opportunity Area 7 (as identified in the West Midlands Strategic Employment Sites Study 2024) to 2042. Opportunity Area 7 principally includes Rugby Borough, and Coventry City's administrative areas, whilst overlapping slightly into Nuneaton and Bedworth Borough and Warwick District.
- 3.7. It is acknowledged that the submission version of the Coventry Local Plan identifies 9ha of unmet employment land need of which RBC proposes in its Proposed Submission Local Plan to accommodate 2.5ha leaving 6.5ha. The contribution that other Warwickshire authorities, who are preparing local plans, will be able to make to meeting this residual unmet need is not yet established.

## Review of the adopted NBBC Local Plan

- 3.8. Policy DS8 of the NBBC Borough Plan Review (2021-2039) covers the circumstances in which the plan will need to be reviewed.
- 3.9. It is agreed that in accordance with Policy DS8 given changes to national planning policy and guidance an immediate review of the Borough Plan Review is triggered. The reference to NBBC commencing a new Local Plan is a statement of procedural fact and does not create a strategic presumption that this is the primary mechanism for accommodating any employment land shortfall from Coventry that cannot be accommodated by other authorities.
- 3.10. It is agreed that the provisions of the Levelling Up and Regeneration Act 2023 to enable plan preparation under the new plan-making and the Town and Country Planning (Local Planning) (England) Regulations 2026 will come into force on 25 March 2026, and a new NPPF is anticipated to be published summer 2026.
- 3.11. It is agreed NBBC are an authority which falls under the NPPF transitional

arrangements, having submitted a plan before 12 March 2025, but meeting less than 80% of its local housing need and therefore are required to give notice to commence a new local plan by 30 June 2026 and publish the Gateway 1 self-assessment by 31 October 2026.

- 3.12. It is agreed that, on the basis of backstop stop dates NBBC are required to meet under the new plan making system, NBBC would not have reached adoption of its new local plan before the currently anticipated local government reorganisation date in Warwickshire of 1 April 2028.
- 3.13. It is therefore agreed that at present there are no established unmet development needs for NBBC. It is further agreed that if such needs are in future established, the mechanism for addressing them will be a plan of the successor unitary authority or authorities for Warwickshire and/or a future spatial development strategy. At the time of writing neither the geography of future unitary authority/ies nor the geography of a future strategic authority and spatial development strategy is known.

## Gypsy and Traveller Accommodation needs

- 3.14. It is agreed that in March 2025 RBC published a Gypsy and Traveller Accommodation Needs Assessment which identifies a need for 94 pitches in the period 2024 to 2042. RBC has identified supply sufficient to accommodate 64 pitches. RBC wrote to all its neighbouring local authorities in Warwickshire, Leicestershire and Northamptonshire requesting assistance with accommodating the remaining shortfall in April 2025. It is agreed that by the time the shortfall was quantified to be 47 pitches (subsequently revised to 30 pitches), NBBC's Borough Plan Review was already at a very advanced stage, and was subsequently adopted in December 2025.
- 3.15. RBC has identified supply sufficient to provide pitches through the period to 2036 and therefore can identify supply for years 1-5 and 6-10 consistent with Planning Policy for Traveller Sites (PPTS) paragraph 10. There is only a need to identify sites for years 11-15 onwards, "where possible", under PPTS paragraph 10b.
- 3.16. It is agreed that if and when NBBC commences preparation of a new plan, NBBC will explore its ability to contribute to meeting RBC's unmet need for Gypsy and Traveller accommodation in the period after 2036.

## 4. Strategic Matters - to be resolved

- 4.1. NBBC has asked RBC to investigate the additional contribution that employment site windfalls could make to meet local need, particularly the unmet local need of Coventry City Council. NBBC's adopted local plan includes a windfall allowance based on past rates of delivery which contributes to meeting local need. RBC will review this as part of its response to the Reg 19 consultation.
- 4.2. This is therefore a matter on which further work is ongoing, but is not considered

by either party to be a significant outstanding issue on which agreement has not yet been reached.

- 4.3. If through the currently ongoing examination of Coventry City Council’s Local Plan further unmet employment land need beyond that outlined in para 3.7 above is established, then participating authorities will continue to engage constructively to consider whether that need can reasonably be addressed through local plans currently in preparation or examination, having regard to the stage of plan preparation. It is agreed that any additional unmet need identified during the Coventry examination will be addressed against a unified evidence base by the Functional Economic Market Area authorities to identify whether they can contribute to meeting that need, if necessary by main modifications to their local plans (if in examination at that point). If further Coventry unmet employment land need is identified but cannot reasonably all be accommodated through local plans at that point in preparation or examination, then it is agreed that any shortfall would need to be addressed through the local plan of the successor unitary authority/ies.

## 5. Further Joint Working

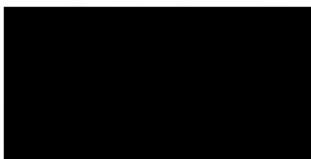
- 5.1. This Statement of Common Ground will be kept up to date through continuous engagement and cooperation between RBC and NBBC. Joint working will continue to take place through the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) group.

## 6. Monitoring

- 6.1. This statement will be maintained by RBC and updated as necessary with NBBC.
- 6.2. RBC will continue to work with NBBC beyond the adoption of the new RBC Local Plan for the monitoring and implementation of the plan.

## 7. Signatories

Signature:



Nicola Smith, Strategic Director for Place, Rugby Borough Council

Date: 18 March 2026

Signature:



Cllr Tony Venson, Portfolio Holder for Planning and Enforcement, Nuneaton and  
Bedworth Borough Council

Date: 24 March 2026

# Appendix 1 – Map of Rugby Borough and surrounding districts



## Appendix 2 - Memorandum of Understanding

Warwickshire area are only in the early stages of reviewing their adopted plans (and acknowledging that not all have commenced such reviews, nor are required to at this stage), the situation is evolving in identifying levels of supply for housing and employment needs within authority boundaries. Through capacity assessment and a strategy of promoting best use of development land it is understood that Coventry anticipates being able to meet its own local housing needs as identified in the HEDNA – Table 1.

- 3.3 The Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (November 2024) establishes that Coventry has 105 Ha of local employment need to 2041, a supply of 60ha and a residual need of 45Ha (Table 3). In regard to strategic need, Appendix 1 of the Alignment Report sets out details of committed sites across the FEMA. Discussions with partners as to how to address residual local and strategic employment needs across the FEMA are underway, therefore the MoU is iterative and will be updated as discussions progress.
- 3.4 This Memorandum of Understanding commits Coventry City Council and the five Borough/District Councils within Warwickshire to an ongoing collaborative process to address the housing and economic development needs of the market area and to maintain realistic assumptions about the availability, suitability and viability of land to meet that need. In addition, given the importance of Warwickshire County Council's role and responsibilities within the area they are a signatory to this MoU.

#### 4. POINTS OF AGREEMENT

- 4.1 It is agreed that for plan making purposes there is a housing market area and functional economic market area comprising Coventry and the whole of Warwickshire. In addition, North Warwickshire Borough Council and Stratford-on-Avon District Council fall within the Greater Birmingham and Black Country Housing Market Area and therefore have a functional relationship with that area.
- 4.2 The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA), produced by independent consultants ICENI Projects on behalf of the Coventry and Warwickshire local authorities, sets out an objective assessment of housing need and employment need for the Coventry and Warwickshire area. The figures below are taken directly from the HEDNA and do not include the 35% 'cities uplift' for Coventry (see para.4.6.3)

**Table 1: Local Housing Need (dwellings per annum) Trend-based - HEDNA**

Authority	HEDNA Housing Need (dpa)
Coventry	1455
North Warwickshire	119

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Authority	HEDNA Housing Need (dpa)
Coventry	1455
North Warwickshire	119

Nuneaton and Bedworth <sup>2</sup>	409
Rugby	735
Stratford-on-Avon	868
Warwick	811
<b>Total</b>	<b>4397</b>

Source: Table 5.33 HEDNA 2022

- 4.3 It is agreed that the 2022 HEDNA, utilising 2021 Census Data, forms the most robust evidence base of establishing the housing and employment needs of the HMA/FEMA for plans being prepared by Coventry City Council and Nuneaton and Bedworth Borough Council, under the December 2023 NPPF.
- 4.4 It is agreed that for plans being prepared under the December 2024 NPPF, the HEDNA Housing Needs are superseded by the December 2024 NPPF Standard Method outcomes of Local Housing Need, as shown in Table 2 below.

**Table 2: December 2024 National Planning Policy Framework - Local Housing Need**

Authority	2024 NPPF Indicative Local Housing Need (dpa)
Coventry	1388
North Warwickshire	364
Nuneaton and Bedworth <sup>3</sup>	737
Rugby	618
Stratford-on-Avon	1126
Warwick	1062
<b>Total</b>	<b>5295</b>

Source: NPPF Standard Method December 2024

- 4.5 It is agreed that the West Midlands Strategic Employment Sites Study (WMSESS) 2023/2024 further informs the strategic employment needs of the HMA/FEMA, and that the Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (2024) accurately updates the HEDNA employment evidence and presents the current levels of employment need and supply across the HMA/FEMA.

<sup>2</sup> Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' to be read alongside the HEDNA which provides more specific consideration of housing and employment need in Nuneaton and Bedworth Borough taking into account relevant local considerations. This identifies a housing requirement of 545 dwellings per annum for Nuneaton and Bedworth Borough.

<sup>3</sup> See Footnote 2 regarding the figure for NBBC.

**Table 3: Local Industrial Residual Need 2021-41 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024**

Authority	Need	Supply	Residual Need
Rugby	58	5	53
North Warwickshire	60	34	26
Nuneaton and Bedworth <sup>4</sup>	41	52 <sup>5</sup>	-11
Coventry	105	60	45
Stratford	144	56	88
Warwick	83	37	46
<b>Total</b>	<b>492</b>	<b>244</b>	<b>248</b>

*NB: figures may not sum due to rounding*

**Table 4: Local Industrial Residual Need 2021-45 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024**

Authority	Need	Supply	Residual Need
Rugby	68	5	63
North Warwickshire	70	34	36
Nuneaton and Bedworth	48	52	-4
Coventry	122	60	62
Stratford	167	56	111
Warwick	97	37	60
<b>Total</b>	<b>572</b>	<b>244</b>	<b>328</b>

**Table 5: Local Industrial Residual Need 2021-50 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024**

Authority	Need	Supply	Residual Need
Rugby	80	5	75
North Warwickshire	82	34	48
Nuneaton and Bedworth	56	52	4
Coventry	143	60	83
Stratford	196	56	140
Warwick	113	37	76
<b>Total</b>	<b>670</b>	<b>244</b>	<b>426</b>

- 4.6 Each Council will cooperate in the delivery of the local housing and employment need which ensures that the overall needs across the housing market area will be met. To achieve this objective, it is agreed that:

<sup>4</sup> Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' and to be read alongside the HEDNA and 'Review of Nuneaton & Bedworth Employment Land Portfolio'. These documents identify a local industrial and warehouse employment need figure for Nuneaton and Bedworth of 66.45 ha.

<sup>5</sup> Figure only includes allocated sites.

- 4.6.1 At the time of signing this agreement it is considered that the HEDNA and WMSESS Alignment paper constitutes robust evidence for future plan-making for both housing and employment land for Coventry and Warwickshire (noting the provisions for calculating housing need as set out in paragraph 4.3 and 4.4).
- 4.6.2 The local authorities consider that the exceptional circumstances in Coventry and Warwickshire which are identified in the HEDNA<sup>6</sup>, justify a departure from the use of the Government's Standard Method for assessing local housing need, in line with paragraph 61 of the NPPF December 2023<sup>7</sup>.
- 4.6.3 It is agreed the 35% cities uplift applies specifically to the Government's Standard Method as referred to in the 2023 NPPF paragraph 62 and supporting Guidance and has been deleted in the 2024 NPPF revision. It relates only to specific cities and there is no requirement for this to be redistributed. It is agreed this figure was not evidenced by Government and did not reflect local need.
- 4.6.4 All parties will work together to address Strategic Employment Needs as shown in Table 6.

**Table 6: Residual Strategic Site needs 2022-2045 – Icen HEDNA - WMSESS Alignment Paper – November 2024**

Opportunity area*	Residual Need
Area 5 – North Warwickshire	50 – 100ha
Area 7 – M6/A45/A46/M45 Coventry and Rugby	9 – 84ha
Area 8 – A46 / M40 Warwick	75 – 125ha

\*As set out in the WMSESS these are broad areas they do not represent Local Authority administrative boundaries

- 4.6.5 The plan making process will ultimately establish the capacity of each area, and the quantities of housing and employment development that can be delivered.
- 4.6.6 Each local authority is committed to ongoing cooperation and engagement by both officers and members in relation to delivery of housing and employment land for the Coventry and Warwickshire area. Should any authority identify a shortfall, the Local Authorities will seek to work constructively together to explore how the needs of the HMA and/or FEMA may be accommodated within the appropriate geography.
- 4.6.7 This MOU will be reviewed as necessary in light of any changes to the National Planning Policy Framework (NPPF) and any new relevant new legislation.
- 4.6.8 All parties confirm the understanding that Coventry City Council is proceeding with

<sup>6</sup> See summary section 5, paragraph 5.159 to 5.161 of the HEDNA.

<sup>7</sup> In line with the Transitional Arrangements under which the Coventry Local Plan is being reviewed.

progressing its plan under the current transitional arrangements and as such it is being prepared in line with the NPPF December 2023. Should this position change the MoU will be reviewed.

## 5. POINTS YET TO BE RESOLVED

- 5.1 Distribution of housing and employment: if any LPA within the area determines they are unable to deliver the amount of housing or employment as identified in the tables contained in this MoU then further discussions will be held and the MoU will be revised as appropriate.
- 5.2 Coventry City Council considers that it cannot meet its residual need of 45 hectares to 2041 and is requesting assistance from partners across the FEMA to help meet its Local Employment Need shortfall. However, the extent of this shortfall has not yet been agreed with partners and has been subject to challenge by other FEMA authorities. The detailed extent of agreement and disagreement will be set out in Statements of Common Ground with the relevant FEMA authorities.
- 5.3 Discussions regarding strategic employment need are underway across the FEMA in relation to the Opportunity Areas identified in the WMSESS but how this will be accommodated is yet to be resolved.
- 5.4 Rugby Borough Council has identified a need for 47 Gypsy and Traveller pitches beyond that which it can meet within its administrative boundaries. It has written to the other signatories to this MOU, together with its neighbouring authorities in Leicestershire and Northamptonshire to seek assistance in meeting this unmet need.

## 6. LIMITATIONS

- 6.1 For the avoidance of doubt, this Memorandum shall not fetter the discretion of any of the Councils in the determination of any planning application, or in the exercise of any of their statutory powers and duties, or in their response to consultations, and is not intended to be legally binding but shows clear commitment and intent to meeting the full housing and employment needs of the market area.
- 6.2 The objectively assessed need figures set out in this MOU have not yet been tested at examination and do not supersede the housing or employment land requirements in current local plans.

## 7. LIAISON

- 7.1 Member level representatives of the Local Authorities will meet when appropriate, in order to:
  - Maintain and update the memorandum, as necessary.

- Monitor the preparation of Local Plans across the six authorities and discuss strategic issues emerging from them.

## 8. MONITORING

- 8.1 Annual monitoring will be carried out for both housing and employment. This will be overseen by the Joint Monitoring Officers Group (JMOG) for the Coventry and Warwickshire area, who will agree monitoring targets to include permissions and completions.

## 9. SIGNATORIES

Signed on behalf of Coventry City Council:



Councillor N Akhtar, Cabinet Member, Housing and Communities

Date: 27th August 2025

Signed on behalf of North Warwickshire Borough Council:

Date:

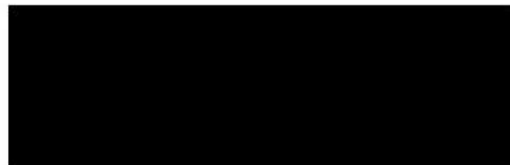
Signed on behalf of Nuneaton & Bedworth Borough Council:

Cllr Tony Venson



Date: 26.06.2025

Signed on behalf of Rugby Borough Council:



Date: 28 July 2025

Authorised Officer: KAREN HILLMAN

Signed on behalf of Stratford-on-Avon District Council:

Susan Juned – Leader of the Council



Date: 21/10/25

Signed on behalf of Warwick District Council:

Councillor Ian Davison – Leader



Date: 15/08/2025

Signed on behalf of Warwickshire County Council:



Date: 05-Mar-26 | 15:35 GMT

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