



RUGBY BOROUGH COUNCIL LOCAL PLAN (2025 – 2042)

**STATEMENT OF COMMON GROUND BETWEEN RUGBY
BOROUGH COUNCIL AND SEVERN TRENT WATER**

APRIL 2026

1. Organisations

- 1.1. Rugby Borough Council (“the Council”)
- 1.2. Severn Trent Water (“Severn Trent”)

2. Introduction

- 2.1. This Statement of Common Ground (SoCG) has been prepared jointly by Rugby Borough Council (RBC) and Severn Trent Water.
- 2.2. The Statement identifies areas of agreement and disagreement between Rugby Borough Council and Severn Trent Water in relation to the Rugby Borough Local Plan (2025-2042) (“the Local Plan”) and its supporting evidence base.
- 2.3. It has been prepared to demonstrate that the Council and Severn Trent Water have effectively cooperated on strategic planning issues relating to the management of water, as required by the Duty to Co-operate and the National Planning Policy Framework (NPPF).
- 2.4. Severn Trent Water are the water company responsible for the provision of water, the removal and treatment of wastewater, and the maintenance of water infrastructure across the Midlands including Rugby Borough.

3. Duty to Co-operate

- 3.1. The Council has engaged with Severn Trent Water throughout the plan-making process.
- 3.2. Severn Trent Water made representations in response to the Issues and Options Consultation (Regulation 18) stating that a majority of the broad areas identified for development were acceptable, while flagging a concern about any further growth at South West Rugby and noting likely constraints with the Rugby-Newbold Wastewater Treatment Works. Severn Trent indicated that they wished to be kept informed about the scale and location of planned development, and recommended wordings for policies relating to drainage hierarchy, sustainable drainage, blue and green Infrastructure, open space, the protection of water resources, and water efficiency.
- 3.3. Further representations were made in response to the Preferred Option Consultation (Regulation 18) in which the prior policy recommendations were reiterated, and comments were made about the risks presented by each of the sites proposed as allocations. Again, Severn Trent water iterated their desire to be kept informed about the scale, location and timeline for planned development so that any necessary infrastructure upgrades could be arranged appropriately.

- 3.4. The Council have fulfilled Severn Trent's request to be kept informed, including by inviting Severn Trent to make representations about the Proposed Submission Local Plan which specifies the type, location, scale and trajectory of proposed developments. A requirement for water efficiency of 110 l/p/d has been carried through into policy, and several of Severn Trent's suggested policy wordings have also been adopted. In the instances where their suggested wordings have not been adopted, the Council believes that its policies (or national policies) adequately address the same points (see the Appendix for a detailed breakdown).
- 3.5. In addition to being consulted on the Issues & Options (Regulation 18) and the Preferred Option Consultation Document (Regulation 18), Severn Trent Water were also separately consulted on the Council's Water Cycle Study (Stages 1 & 2) and Strategic Flood Risk Assessment (Levels 1 & 2).
- 3.6. In sum, the Council have continually engaged Severn Trent Water throughout the plan-making process, and have taken their representations into account with a view to ensuring the Local Plan can deliver sustainable development.



4. Agreed Matters

- 4.1. Rugby Borough Council and Severn Trent Water **agree** that the proposed submission version of the Rugby Borough Local Plan 2025-2042 is sound insofar as it relates to the duty of the Council to co-operate with Severn Trent Water.
- 4.2. It is **agreed** that the strategy, allocations and policies within the Local Plan provide a sound basis for the Borough's water resources to be managed up to 2042 in accordance with national legislation.
- 4.3. It is **agreed** that the plan's supporting evidence including the Water Cycle Study (Stage 1 & 2), Strategic Flood Risk Assessment (Levels 1 & 2), and Infrastructure Delivery Schedule provide an adequate assessment of the required water infrastructure to support planned growth up to 2042.

5. Monitoring

- 5.1 This Statement will be maintained by the Council and updated as necessary with the input and authorisation of the Severn Trent Water.
- 5.2 Rugby Borough Council will continue to work with the Severn Trent Water beyond the adoption of the Plan Review for the monitoring and implementation of the Plan.
- 5.3 The Council commit to inform Severn Trent Water of any changes that are made to the Local Plan prior to its adoption.

6. Signatories

	Signature: 
Husna UI-Haq Planning Analyst	Nicola Smith, Chief Officer – Growth and Investment, Rugby Borough Council
Date: Wednesday 22nd April 2026	Date: Monday 20 th April 2026

Appendix I: Summary of STW Representations and Council Responses

Preferred Option Consultation

Ref	Severn Trent Water Representation (summary)	Council Action or Response
1	<p>25 sites proposed as allocations in the Preferred Option Consultation Document were identified by STW as being “Medium/High Risk”. These were the larger allocations which would require treatment at Brinklow, Coventry-Finham, Rugby-Newbold and Wolston treatment works.</p> <p>For each of these sites STW concluded that “Overall this development site is considered a medium/high risk location, there is some capacity however in order to accommodate growth, infrastructure upgrades will be required and we would need to work closely to understand build timelines, in order to plan accordingly.”</p>	<p>The Council has continued to consult STW on its emerging local plan since the Preferred Option consultation. Data was provided by STW for the Water Cycle Study, and STW were consulted on the draft version of the Study before it was finalised. Furthermore, STW have been invited to comment on the Proposed Submission Local Plan, which includes a trajectory for housing.</p>
2	<p>Three sites proposed as allocations in the Preferred Option Consultation Document were identified by STW as being “Medium Risk”.</p> <p>For these sites, STW concluded: “Overall this development site is considered a medium risk location, there is some capacity however in order to accommodate growth, infrastructure upgrades will be required and we would need to work closely to understand build timelines, in order to plan accordingly.”</p>	<p>See answer above.</p>
3	<p>Two sites proposed as allocations in the Preferred Option Consultation Document were identified as being “Low Risk”.</p> <p>For both of these sites STW commented: “This development will likely require treatment at WOLSTON (STW) Treatment Works, this treatment works has available capacity and low environmental constraints. Due to the size of the development, this development site is considered a low risk location.”</p>	<p>See answer above.</p>

Issues & Options Consultation

Ref	Severn Trent Water Representation (summary)	Council Action or Response
1	Broadly supportive of the locations identified for employment land. We would welcome early insight into the scale and likelihood of the proposed additional employment land.	The Council has continued to inform STW about the proposed allocations within its emerging local plan, including the scale and location of sites at the Preferred Option (Reg 18) stage, and the scale, location and trajectory of sites at the Proposed Submission Local Plan (Reg 19) stage.
2	We are supportive of measures to ensure that both residential and non-residential development meets the higher water efficiency standards of 110l/p/d.	Support acknowledged. Proposed policy requires this standard of water efficiency.
3	From an initial high level review the majority of locations appear to be acceptable. Scale will be key in determining whether sewerage issues will be caused, therefore, we wish to be kept informed about this. An initial concern is that any additional growth at South West Rugby will necessitate revision of improvement plans. We also note that there are likely constraints with the Rugby Newbold Wastewater Treatment Works.	The Council has continued to inform STW about the proposed allocations within its emerging local plan, including the scale and location of sites at the Preferred Option (Reg 18) stage, and the scale, location and trajectory of sites at the Proposed Submission Local Plan (Reg 19) stage.
4	Recommend adopting the following drainage hierarchy policy wording: <i>“New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.”</i>	We have not adopted this specific wording, but believe that Policy D5 has the same effect. The policy requires that all developments that create a need for surface water drainage shall include SuDS; that infiltration SuDS are preferred; and that where infiltration is proven not to be possible, water should be discharged into a watercourse and then only a surface water sewer if there is no nearby surface water body.
5	Recommend adopting the following sustainable draining policy wording: <i>“All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface</i>	We acknowledge this suggested policy wording, though we are content that our policy (D5) addresses all the same points.

	<p><i>water run-off are included, unless proved to be inappropriate.</i></p> <p><i>All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.</i></p> <p><i>Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.”</i></p>	
6	<p>Recommend adopting the following Blue and Green Infrastructure policy wording: <i>“Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.”</i></p>	<p>We have not adopted this specific wording, but believe that our policies adequately address the same points. For example: Policy EN1 gives protection to watercourses that have national or local environmental designations; Policy EN5 requires that developments shall deliver biodiversity net gain; Part C of Policy EN7 specifies that areas within 8 metres of watercourses will be safeguarded from development; and Policy EN8 specifies that development shall not cause unacceptable harm to the natural environment.</p>
7	<p>Recommend adopting the following Green Open Spaces policy wording: <i>“Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.”</i></p>	<p>We believe this point is already adequately addressed by national and local policy, including Policy D5 which gives support to SuDS which provide good quality open spaces.</p>
8	<p>Recommend adopting the following policy wording relating to the protection of water resources: <i>“New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute</i></p>	<p>This wording has been used in part B of policy CL3 Water Supply and Efficiency.</p>

	<p><i>groundwater, a groundwater risk assessment will be needed to support a planning application.”</i></p>	
<p>9</p>	<p>Recommend adopting the following policy wording relating to water efficiency: <i>“New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.”</i></p>	<p>This wording has been used in part C of policy CL3 Water Supply and Efficiency.</p>

Appendix II: Growth Planned for via the Local Plan 2025-2042 (including existing commitments)

Residential

Source	Number of Homes 2025-2042
South West Rugby S8 & S9	3,505
Houlton remainder deliverable by 2042	3,060
Eden Park, Rugby	602
Other allocations under Local Plan 2011-2031	205
Other sites with planning permission	621
Allocations under Policy S6	2,886
Small site windfalls (fewer than 5 homes)	850
Total	11,729

Allocations under Policy S6		
Ref.	Site name	Units
62	Morgan Sindall House, Rugby	90
332	Albert Street, Rugby	25
353	Town Hall, Rugby	114
283	Rugby Central Shopping Centre	200
350	Rounds Gardens, Rugby	70
351	North of Rounds Gardens, Rugby	60
354	92 Lower Hillmorton Rd, Rugby	34
355	Land adjacent to 44 Craven Road, Rugby	5
279	Stagecoach Car Park, Rugby	32
153	Westway Car Park, Rugby	24
294	Land adjacent 9 Railway Terrace, Rugby	14
356	The Railings (NHS) Rugby	10
357	28-29 High St, Rugby	8
352	Former snooker hall, Railway Terrace	7
249	Land to rear of Albert St, Rugby	5
338	Land south of Crick Road, Houlton	250
59	Newton Manor Lane, Brownsover	285
54	Oakdale Nursery, Brandon (adj Binley Woods)	43
337	West Farm and Home Farm, Brinklow	75
315	Land south of Rugby Road, Brinklow	250
129	Land N of Lilbourne Rd, Clifton upon D'more	60
202	Newton Road, Clifton upon Dunsmore	80
307	North Road, Clifton upon Dunsmore	10
253	Lawford Fields Farm, Long Lawford	250
316	Land at Long Lawford	400
172	Elizabeth Way, Long Lawford	5
87	Hillcrest Farm, Newton	25
100	Land at High St., Ryton-on-Dunsmore	37
6	Fosse Way, Stretton-on-Dunsmore	3
81	Land W of Fosse Way, Stretton-on-D'more	40
348	The Croft, Stretton-on-Dunsmore	70
39	Dyers Lane, Wolston	15

136	North of Warwick Rd, Wolston	80
358	Land at Coventry Road, Wolvey	60
309	Land north of B4109, Wolvey	150

Greater detail about each of the above sources of housing over the new plan period (2025-2042) is available in the [Whole Plan Trajectory document](#).

Employment Land

Source	Approx. square metres of floorspace 2025-2042
Prospero Ansty and Ansty Park	26,663
Coton Park east of Castle Mound Way	26,421
Padge Hall Farm	137,730
Houlton remaining employment land	15,000
Employment planning permission on small sites as at 1 April 2025	13,429.4
Crowner Fields Farm, Ansty (Allocation)	275,000
Coton Park east (Allocation)	115,000
South West Rugby phase 2 (Allocation)	60,000
Ansty Park north (Allocation)	75,000
Land at Walsgrave Hill (Allocation)	290,000
Total	1,034,243