



Please ask for
E-mail Address

Nicola Smith
nicola.smith@rugby.gov.uk

Rebecca Quinlan
Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN
By email only:
Rebecca.Quinlan.07@planninginspectorate.gov.uk
Cc:
Plans.admin@planninginspectorate.gov.uk

Date

27 April 2026

Dear Rebecca

Submissions of the Rugby Borough Local Plan 2025-2042 to the Secretary of State for examination

1. Rugby Borough Council is pleased to formally submit our Local Plan 2025-2042 to the Secretary of State for examination. All submission documents are included in the enclosed submission documents list.
2. I also enclose, as a separate attachment, our completed Planning Inspectorate pre-submission checklist.
3. If the inspectors (once appointed) require hard copies of any of the documents, please let us know.
4. Copies of all submission documents will be deposited at Rugby Town Hall and at libraries and are available on the examination website:
<https://www.localplanservices.co.uk/rugbylocalplanexamination> The documents deposited at the town hall and libraries do not include hard copies of representations received at Regulation 19 stage. Under Regulation 22(3)(iii) of The Town and County Planning (Local Planning) (England) Regulations 2012 the volume of representations received means that it is not practicable to make hard copies of these available at the deposit points. Electronic copies of the Regulation 19 representations are available on the examination website.

Programme Officer

5. Ian Kemp Ian Kemp ian@localplanservices.co.uk T: 07723 009 166 has been appointed as programme officer.

Modifications

6. Rugby Borough Council requests under Section 20(7C) of the Planning and Compulsory Purchase Act 2004 that the Inspector(s) recommend modifications needed to make the plan sound and legally compliant, if necessary. Please treat this letter as our formal request.
7. Core document CD20 is a schedule of suggested modifications. The modifications are split into those that are corrections/minor clarification points and can be addressed as additional modifications and those which are relevant to issues of soundness and so may need to be considered as main modifications.
8. The modifications put forward are not extensive in scope and comprise relatively minor detailed wording changes or additions. These are modifications proposed by the council in response to representations made in response to the Regulation 19 consultation or based on statement of common ground negotiations with prescribed bodies. As such, these modifications have not been subject to public consultation.

Statements of common ground

9. Documents SOCG1-SOCG16 are statements of common ground with 15 neighbouring authorities and prescribed bodies.
10. One draft statement of common ground, with Historic England (SOCG10), is submitted. Historic England have advised that they need more time to formulate their response to the new material prepared in response to their objection to site 121 Walsgrave Hill (see the section titled “Additional Evidence” below).
11. It is anticipated that a signed statement of common ground with Historic England will be concluded on or around 13 May 2026 and will be submitted by the council at that point.
12. Additionally, SOCG6 with Stratford on Avon and Warwick District Councils is an agreed final version which has been signed by Warwick District Council and Rugby Borough Council but not yet signed by Stratford on Avon District Council. Once Stratford on Avon District Council has signed, an updated copy will be submitted to the examination.
13. All other submitted statements of common ground have been signed.

Additional Evidence

14. The following documents comprise additional evidence which did not form part of the Regulation 19 consultation. As detailed below, the new evidence is explanatory and is produced in direct response to representations made to the Regulation 19 consultation. The new evidence provides further explanation and technical detail to assist the examination of soundness. It supports the conclusions in the evidence base available at Regulation 19 stage and is not being used to justify proposals for modifications to the plan. The council’s view is that the plan is sound without this additional evidence.

15. Interested parties had fair opportunity to comment on the plan and its evidence base at Regulation 19 stage. The additional documents do not introduce materially new issues. Therefore, the council considers that no additional public consultation on these documents was necessary.
16. The documents are as follows:
 - Document SS28 Heritage assessment addendum for Site 353 Town Hall, Rugby – produced to respond to Historic England’s representation at Regulation 19 stage. This is evidence supports the submitted plan and no modifications are proposed based on it.
 - Documents WH1 Walsgrave Hill Heritage and Landscape Analysis and WH2 Walsgrave Hill County Park Strategy comprise material produced by the Walsgrave Hill (site 121) site promoters in response to Historic England’s representations at Regulation 19 stage. The position of the council in the proposed submission plan is that the public benefits of the proposal can outweigh the harm to heritage assets, the degree of which can be reduced through mitigation. Historic England objected to the site allocation and to respond to that objection the site promoters prepared more detailed analysis of the heritage and landscape impacts, and more detail on the mitigation strategy and the proposed country park. Both the mitigation strategy and the country park were inherent in the proposed submission local plan consulted on at Regulation 19 stage. The new material provides greater detail on how these could be delivered and analysis of heritage and landscape impacts. Although the new material is prepared by the site promoter, it was prepared at the request of the council, and its scope and methodology were agreed by the council’s heritage consultant. Therefore, the new material is evidence to support the submitted plan and allow a greater understanding of the issues raised by Historic England. The documents also inform the draft Statement of Common Ground with Historic England.
 - Document WH3 Heritage assessment Addendum for Site 121 Land at Walsgrave Hill. This is an update to the heritage assessment prepared and consulted on at Regulation 19 stage. It confirms the conclusions of the original assessment and includes comments on the additional analysis and details of the mitigation strategy and country park provided through documents WH1 and WH2. The note confirms the council’s position in the proposed submission plan consulted on at Regulation 19 stage. This document was prepared in response to the Regulation 19 representations of Historic England and informs the draft Statement of Common Ground with Historic England.
 - Document H3 Rugby Updated Housing Needs Evidence Report- Addendum on Affordable Housing Need over the 2025-42 plan period. This is short clarificatory note on affordable housing need in response to representations submitted at Regulation 19. The note confirms the affordable housing need position in previous evidence. No modifications are proposed based on it.
 - Document I16 Response to National Highways review of traffic modelling. This document was produced in response to National Highways’ representation to the Regulation 19 consultation which requested this additional information.

This supports the submission plan, and no modifications are proposed based on it.

- Document I14 Rugby Strategic Transport Assessment Additional Responses to Regulation 19 Submissions – Walsgrave/Ryton Employment Allocations. This document is produced to respond to a representation made by Prologis (the promoter of the Ryton West employment omission site) in relation to the transport modelling of Toll Bar End junction at Regulation 19 stage. The note confirms the conclusions of the strategic transport assessment in relation to impact at that junction. The note provides, as an additional sensitivity, the results of further testing of the impacts of the plan and the Ryton West omission site on the Toll Bar End junction using the Kenilworth and Southam Wide Area model. This junction had already been modelled through the Strategic Transport Assessment and the additional modelling supports the conclusions reached therein. No modifications are proposed based on this evidence which supports the submission plan.
- Document I15 Local Plan Viability Study Comments on viability in responses to Regulation 19 consultation. The viability note responds to criticisms of the whole plan viability assessment raised by Miller Homes (the promoter of the Lodge Farm omission site) in its Regulation 19 consultation response. The note makes a correction to the appraisal of the Lodge Farm omission site. The clarificatory note confirms the position in the submitted plan and the whole plan viability assessment and no modifications are proposed based on it.
- Document I17 Updated Infrastructure Delivery Schedule. One addition is made to this schedule “New recycling centre and waste transfer station”. This is added to respond to a Regulation 19 representation from Warwickshire County Council which objected to the omission of this. The reference in the Infrastructure Schedule to provision of a recycling centre and waste transfer station support a proposed additional modification to the reasoned justification to Policy I4 (see document CD20). Neither change is considered by the council to be necessary to address an issue of soundness. The provision of these facilities is a matter for the waste local plan of Warwickshire County Council. This is clarificatory text only.

17. In addition, documents CD21 (Sustainability Appraisal Scoping Report 2023) and SD17 (Rugby Borough Economic Strategy 2025-2035) are documents that were published and available on the council’s website at the time of the Regulation 19 consultation but did not form part of the consultation document list. Document CD20 was published and consulted on at an earlier stage of plan making (Regulation 18 issues and options stage). Document SD17 is a corporate strategy of the council and was subject to its own public consultation and adoption process. Neither document comprises new evidence, but they are added to the submission documents list for completeness

Notice of submission

18. Notification will be sent to all those who have commented on the Proposed Submission Local Plan, requested to be kept informed of progress on the Local Plan, or have asked to be notified of when we have submitted the Local Plan for examination.

19. We look forward to hearing from you with details of appointment of the inspector(s) and likely hearing dates.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Nicola Smith". The signature is written in a cursive style with a large initial 'N'.

Nicola Smith MRTPI
Strategic Director for Place

Encs.