



Historic England

Our ref:  
Your ref:

Telephone:  
Email:

01 February 2024

FAO: Development Strategy Team  
[localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk)

Dear Sir/Madam,

**Re: Rugby Borough Local Plan – Issues and Options Consultation, October 2023 and Sustainability Appraisal (SA) Scoping Report October 2023**

Thank you for consulting Historic England on the Rugby Borough Local Plan Issues and Options and accompanying Sustainability Appraisal Scoping Report. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully considered at all stages and levels of the Local Plan.

We note that this is the first stage of the Local Plan consultation, published alongside the Sustainability Appraisal Scoping Report. In relation to this **Issues and Options** consultation, we have the following comments:

General Comments

Firstly, Historic England notes that this is both the first iteration of the consultation on Rugby Borough's Local Plan, and that this Issues and Options document has been limited to seven planning issues considered to be the most significant in the Borough. We also note that heritage is not included either as a stand-alone issue or encompassed as part of any of the issues identified, despite there being clear connections between heritage and other issues, such as town centre regeneration and climate change.



Historic England, Midlands Regions Group, The Foundry, 82 Granville Street, Birmingham, B1 2LH

Telephone 0121 6256888 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Historic England considers that a good spatial strategy will offer a positive holistic approach throughout the whole plan, whereby the historic environment is considered not just as a stand-alone topic, but as an integral part of every aspect of the plan and should therefore be interwoven within the entire document.

The NPPF is clear that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment (para. 196) to ensure that growth options and site allocations avoid harming the significance of both designated and non-designated heritage assets, including effects on their setting. There may also be opportunities to enhance or better reveal the significance of heritage assets (NPPF para. 212), or opportunities to tackle heritage at risk through sensitive development.

As it is not clear how the historic environment has been considered within this Issues and Options document, this lack of clarity therefore raises issues over the soundness of the Plan at this current stage.

However, from the information included in the Sustainability Appraisal, it is evident that some analysis of the historic environment of Rugby Borough has been undertaken. Historic England strongly advises that this should be encompassed within the Local Plan, especially as some of the issues identified in the Issues and Options document have implications for the historic environment, as set out below. It would be worth considering setting out this analysis in more detail, either as a stand-alone piece of evidence base work for the Local Plan, for instance as a topic paper, or as a heritage assessment section within a wider evidence document.

Within the seven areas currently included in the Issues and Options document, Historic England considers that the historic environment should be encompassed within the following:

#### **4. Town Centre Regeneration**

Historic England considers that the historic built environment should play an active role when considering town centre regeneration, and regeneration more broadly. Rugby Borough has many listed buildings, including several within the identified local centres. Again, we refer to the accompanying Sustainability Appraisal for some analysis of the historic environment and suggest that this information is linked into any consideration and strategy for the regeneration of these town and local centres.

We note that heritage assets are included on the map showing identified development sites for the Regeneration Strategy and we would therefore question as to why these have not been mentioned when discussing possible site allocation policies. To ensure that plans are positively prepared Historic England advises undertaking the process of the 'Site Selection Methodology' as set out in Historic England's Advice Note 3 The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3):

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>





Where appropriate, we would also recommend that Heritage Impact Assessments (HIAs) are prepared, either by, or on behalf of, the Local Authority, with reference to Historic England's Advice Note 3 The Historic Environment & Site Allocations in Local Plans, 2015 (HEAN3) and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3) :

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

With specific reference to non-designated heritage assets, these can make a positive contribution to the character of an area and enrich a sense of place. Any regeneration strategies must robustly consider their impact on the historic environment, in line with NPPF guidelines. We recommend that the views of your chosen specialist archaeological adviser are sought, to ensure that any proposed regeneration scheme is deliverable in accordance with national and local planning policies. Your adviser will inform you on whether further assessment work is required, to ensure the extent, character, setting, and significance have been understood to inform the allocation of any sites.

## 7. Climate Change Policies

Historic England considers that the historic built environment has a significant role to play in achieving Net Zero, and therefore also should be considered as part of any climate change policies. The current section on Energy and Water Efficient Buildings considers the possibility of requiring new builds to be 'net zero' but fails to mention the importance of the role of the current building stock in diminishing carbon emissions.

Historic buildings represent an investment of embodied carbon and other resources and demolishing and replacing them requires a significant reinvestment of both energy and the resources required. Retrofitting and restoring the existing building stock has a much lower carbon output and will also contribute to lower carbon emissions over the course of a building's lifespan. This should be a consideration during the preparation of climate policies in the Local Plan.

We refer you to Historic England's recent consultation on its draft Climate Change advice note, which we hope will be of assistance:

<https://historicengland.org.uk/content/docs/guidance/climate-change-historic-building-adaptation-consultation-draft/>



