

Non-technical summary of the SA Report published alongside the Proposed Submission Rugby Borough Local Plan

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Rugby Borough Local Plan being prepared by Rugby Borough Council. Once adopted, the plan will set a strategy for growth and change up to 2042, allocate sites to deliver the strategy, and establish policies against which planning applications will be determined.

SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. The formally required SA Report is currently published alongside the “proposed submission” version of the Local Plan under ‘Regulation 19’, with a view to informing representations and subsequent plan finalisation.

The SA Report is presented in three parts:

- Part 1 – explains work that has been undertaken to explore **reasonable alternatives (RAs)** in the form of alternative approaches to growth, or ‘growth scenarios’. Specifically, work is explained to define RAs (Section 5), appraise RAs (Section 6) and then feed-back to RBC officers (Section 7).
- Part 2 – presents an appraisal of **the Local Plan** (under the ‘SA framework’).
- Part 3 – explains **next steps**, namely submission of the Local Plan for an Examination in Public.

Part 1 comprises the bulk of the SA Report and, in particular, the report explains an in-depth process to define RA growth scenarios (Section 5).

A starting point is an understanding of the emerging preferred approach, which is an evolution of that previously published for consultation in 2025, and then the task is to define a series of alternative (i.e. non-preferred) approaches. Section 5 works through a process (introduced in Section 5.1) involving considering strategic factors (Section 5.2), site options (Section 5.3) and settlement-specific considerations / scenarios (Section 5.4) before ultimately reaching a conclusion on RA growth scenarios (Section 5.5). Ultimately two sets of RA growth scenarios are defined:

- Housing – eight RA growth scenarios are defined comprising the proposed submission approach (Scenario 1) alongside four alternatives involving a similar quantum of growth and then three higher growth scenarios. Several ‘omission sites’ involving urban extensions to Rugby feature across Scenarios 2 to 8 plus one new settlement option (Lodge Farm), although it is important to be clear that the new settlement option features only in the highest growth scenario (Scenario 8). Expansion south of Long Lawford (650 homes) is the only proposed allocation that is a ‘variable’ across the growth scenarios, i.e. such that all of other proposed allocations are ‘constants’.
- Employment – four RA growth scenarios are defined comprising the proposed submission approach (Scenario 1) alongside three alternatives, which involve substituting one of the proposed allocations (Walsgrave Hill) for one or more omission sites. Again, it is the case that proposed allocations other than Walsgrave Hill are held constant.

Section 6 of the SA report then presents an appraisal of the two sets of RA growth scenarios under the ‘SA framework’ which is essentially a series of sustainability topics / objectives (see Section 3). In respect of both sets of scenarios the appraisal finds that the proposed submission approach performs well or reasonably well but that there is a case to be made for certain of the higher growth scenarios in respect of certain sustainability topics / objectives.

With regards to Section 7, which presents RBC officers' response to the appraisals:

- Housing – The appraisal shows the proposed submission approach (Scenario 1) to perform suitably well overall, albeit alternatives are shown to have merit in certain respects.

In terms of growth quantum, the proposed approach provides for local housing need (LHN) in full to 2042, and there are limited strong arguments to be made for higher growth. In particular, the appraisal shows there to be clear drawbacks to scenarios involving higher growth via support for a new large scale strategic site. In this respect the appraisal draws on and adds to the evidence provided in the Strategic Transport Assessment and Viability Study.

Officers would highlight the ongoing delivery of the strategic sites at South West Rugby and Houlton and Rugby's historically high rates of recent growth, together with high-level of public concern about infrastructure keeping pace with growth, as further strong arguments against high growth scenarios.

The weak performance of the high growth scenarios also weakens the case for extending the plan period and supports the council's view that decisions about longer-term strategy for the mid 2040s and beyond are better taken by the successor unitary authority in the context of a strategic development strategy, the new plan-making system and new national policy.

The appraisal finds there to be limited case to be made for scenarios involving non-allocation at Long Lawford, which is helpful in terms of demonstrating that there are exceptional circumstances for Green Belt release here. The appraisal highlights that there is a case to be made for additional growth outside of the Green Belt to the south of Rugby, potentially with a view to not releasing Green Belt at Long Lawford, but there are also clear constraints to growth in this area, given the Rainsbrook Valley and proximity to the committed strategic urban extension at South West Rugby. This echoes public concerns about these options highlighted through the Regulation 18 consultation and ties in with new landscape evidence gathered since that consultation.

- Employment land – Whilst the appraisal finds all of the scenarios to have pros and cons, the proposed submission approach (Scenario 1) is shown to perform most strongly in transport terms and is also shown to be one of the two best performing scenarios in terms of delivering on economy / employment land objectives. These are two key factors such that, overall, it is possible to conclude that Scenario 1 best represents sustainable development.

This supports the council's exceptional circumstances case. Overall, it is considered that Scenario 1 provides the greatest level of opportunities both in economic terms and for wider community benefits while raising fewer transport concerns than the alternative scenarios. In particular, the submission approach has potential to deliver sustainable transport to a large workforce that is superior to other scenarios.

A further consideration is the possible higher growth scenario involving Scenario 1 plus additional employment land allocated in the Thurlaston area (a scenario that is not formally appraised but is discussed above at para 6.3.4). However, this approach is not supported given the weak strategic case plus local sensitivities around: maintaining a settlement gap to Thurlaston and Dunchurch; the need to deliver and mitigate the impacts of South West Rugby; and the constraints on this part of the highway network.

Moving onto **Part 2** of the SA Report, this essentially builds upon the appraisal of Scenario 1 in Section 6.2 (Housing growth scenarios appraisal) and Scenario 1 in Section 6.3 (Employment growth scenarios appraisal). Specifically, added consideration is given to: A) site allocations that are a 'constant' across the growth scenarios; and B) thematic and site specific policies.

The appraisal concludes as follows:

The appraisal predicts: **significant positive effects** under two headings (economy / employment and homes); moderate or uncertain **positive effects** under three headings (accessibility, communities/health/wellbeing and transport) and moderate or uncertain **negative effects** under one heading (resources). Neutral effects are predicted under the remaining headings (which is not to suggest that there are not certain tensions with sustainability objectives to explore further). There is strong support for changes made since the Draft Plan stage, albeit also some aspects of the changes can be questioned in some respects (i.e. under specific sustainability topic headings).

There will be the potential to make adjustments to the plan through the examination in public in order to improve the performance of the plan, albeit the remit/role of the Planning Inspector(s) will be limited. The appraisal highlights a number of specific matters that might be given further consideration; however, it is difficult to make specific **recommendations**, because any recommendation made with a view to improving the performance of the plan under one sustainability topic heading could have knock-on implications for performance under another heading. For example, it would be easy to recommend more stringent requirements in respect of affordable housing within the urban area, but there would be implications for wider objectives with cost implications and/or the deliverability of the sites would be called into question.

Focusing on Development Management policy, moving forward it will be important to consider policy requirements in the round where they are associated with a cost for developers, with a view to striking the right balance between policy priorities (e.g. affordable housing vs infrastructure vs wider policy asks) in the context of development **viability**. It is important to be clear what is being prioritised and what compromises are being made / trade-offs accepted with a view to a 'whole plan' with good viability credentials and, in turn, minimal delivery risk (albeit delivery risk is reduced by a healthy supply buffer).

Finally, as part of SA there is a requirement to consider '**cumulative effects**', i.e. the effects of the plan in combination with other plans / strategies, with a key matter being collaboration with Coventry and the Warwickshire authorities in respect of providing for employment land needs. Overall the proposed strategy is judged to perform very well, but the new reduced plan period is acknowledged. Moving forward it is important to recall the context of Local Government Review (LGR) and devolution, under which there will be potential to provide for sub-regional development needs.

Finally, with regards to the discussion of next steps in **Part 3** of the report, it is essentially the case that:

Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the aim is to submit the plan for examination in public alongside a summary of the issues raised through the Regulation 19 publication period. Following examination, and assuming the plan is found to be sound, it will then be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

Part 3 then ends with a discussion of matters that might be a focus of monitoring following plan adoption, in light of the appraisal presented in Part 2. The suggestion is a focus on:

- Employment land – as a nationally significant growth location it will be important to monitor employment land delivery closely, including in respect of the specific types of employment units coming forward within strategic employment sites.
- Schools capacity – this is a key issue locally, and effective monitoring of capacity issues and opportunities will assist with future plan-making.
- Delivery on policy requirements – given viability challenges there should be a focus on monitoring the extent to which policy requirements are being delivered in full, including in respect of transport infrastructure, affordable housing and net zero development.