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Rugby Borough Local Plan

Sustainability Appraisal Post-Adoption Statement

Prepared by LUC
May 2019

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1 Introduction

- 1.1 Rugby Borough Council adopted the Rugby Borough Local Plan (the Local Plan) on 4th June 2019.
- 1.2 During the preparation of the Local Plan the Council was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports published alongside the different versions of the Local Plan during its development.
- 1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires the Council to make the SA Report available alongside the Adopted Local Plan. The SA Report was the Rugby Borough Council Local Plan 2011-2031: Publication Draft Sustainability Appraisal Report (September 2016). This was published alongside the Rugby Borough Council Local Plan – 2011-2031: Publication Draft (September 2016) and both were published for consultation between September and November 2016.
- 1.4 Subsequent SA work was carried out in August 2018 to consider proposed Main Modifications to the Local Plan. These modifications were prepared with guidance from the Inspector to take account of matters raised during the examination by the Inspector and participating representors. The Addendum concluded that the proposed modifications would result in a number of changes to the SA scores previously identified for the Local Plan, and these changes were summarised in the document.
- 1.5 The final SA Report for the adopted Local Plan therefore comprises the following documents:
 - Rugby Borough Council Local Plan 2011-2031: Publication Draft, Sustainability Appraisal Report (September 2016).
 - Rugby Borough Local Plan: Publication Draft, Sustainability Appraisal Report: Non-Technical Summary (September 2016).
 - Rugby Borough Local Plan: Main Modifications, Sustainability Appraisal Addendum (August 2018).

Requirement for the Adoption Statement

- 1.6 In addition to the requirement in Regulation 26 of the Town and Country Planning (England) Regulations (2012) for publishing the SA Report alongside the adopted Local Plan, the SEA Regulations¹ also require a number of steps to be taken upon adoption of a Local Plan (in this case the Rugby Borough Council Local Plan). Specifically, SEA Regulation 16 sets out the post adoption procedures for the SEA and requires that, as soon as reasonably practicable after the adoption of a plan for which an SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the Environmental Report and an 'SEA adoption statement', and inform the public and consultation bodies about the availability of these documents. The consultation bodies are the Environment Agency, Historic England and Natural England. The SEA adoption statement must explain:
 - How environmental considerations have been integrated into the Plan.
 - How the Environmental Report (which, for Rugby Borough Local Plan, is contained within the SA Report) has been taken into account during the preparation of the Plan.

¹ The Environmental Assessment of Plans and Programmes 2004 – SI No. 1633

- How the opinions expressed by the public, consultation bodies and (where appropriate) other European Member States during consultation on the plan and the Environmental Report have been taken into account.
- The reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Plan.

1.7 As the SEA process was incorporated in the SA process for Rugby Borough Local Plan, and the Environmental Report integrated within the SA Report, this document constitutes the SA/SEA Adoption Statement for the Local Plan. The document is organised according to the SEA Regulation requirements listed above and reflects the following structure:

- **Chapter 2** summaries how environmental considerations have been integrated into the plan by explaining who carried out the SA/SEA and what assessment framework was used.
- **Chapter 3** summarises the links between the plan-making and SA/SEA processes and how the SA/SEA recommendations were taken into account.
- **Chapter 4** summarises the consultation opinions provided on the SA/SEA at each stage and describes what changes were made to the SA/SEA process in response to these comments.
- **Chapter 5** describes the alternatives/options considered as part of the Local Plan preparation process and why certain options were chosen.
- **Chapter 6** describes how the significant sustainability/environmental impacts of the Local Plan will be monitored.

2 How environmental and sustainability considerations have been integrated into the Rugby Borough Council Local Plan

- 2.1 The SA (incorporating SEA) of the Local Plan process began in March 2013 with the production of a Scoping Report for the Rugby Borough Plan and the Traveller Sites DPD which the Council was intending to produce at that time². The SA Scoping Report was prepared by LUC on behalf of Rugby Borough Council. Although the Scoping Report was produced in relation to those two DPDs, it was considered to remain relevant for setting the scope of the SA work that was subsequently undertaken for the new Local Plan and was refined to ensure it was appropriate for the SA of the full Local Plan. LUC carried out the remainder of the SA process, including this Post-Adoption Statement.
- 2.2 The purpose of the SA was to assist the Council in preparing the Local Plan by identifying the key sustainability/environmental issues that face the plan area, to predict what would be the likely effects of the Local Plan on these issues and put forward recommendations to improve the Local Plan. The aim was to ensure that the Local Plan has as many positive effects as possible and that any significant negative effects are avoided or mitigated as reasonably possible alongside implemented policies, particularly those resulting in new development within the plan area.
- 2.3 The SA was undertaken iteratively, such that at each stage of the Local Plan's preparation, the sustainability including environmental effects of the options for the Local Plan were assessed. SA Reports were produced to describe the approach taken and to identify the likely effects of the Plan. In this way, environmental and sustainability considerations were integrated into the Local Plan as it was developed.
- 2.4 The way in which the environmental and sustainability effects of the Local Plan were described, analysed and compared was through the use of a set of SA objectives. The SA objectives for the Local Plan were developed during the Scoping stage of the SA process, drawing on a review of relevant European, national and regional policies, plans and programmes and the objectives they contained, as well as a review of key sustainability issues in the area. The resulting SA 'framework' comprised 18 SA objectives, each with supporting sub-questions, which were used to decide whether the Local Plan would be likely to achieve each objective. This SA framework was the main tool used at each stage of the SA for assessing the likely effects of the options and policies of the Local Plan. Using the same SA framework ensured that reasonable alternatives were assessed in a comparable way as part of developing the Local Plan.
- 2.5 **Table 2.1** below presents the SA framework for the Local Plan. The right-hand column shows how the 'SEA topics' (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives.
- 2.6 The Local Plan was also required to be subject to Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (as amended)³. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Local Plan was undertaken separately from the SA but the findings of the HRA Reports informed the SA process, particularly in relation to judging the potential effects on SA objective 16, Conserve and where possible enhance the Borough's biodiversity, flora and fauna.

² The production of the Traveller Sites DPD has been delayed.

³ Note that at the start of the process, an earlier (2012) version of these regulations applied. However, the HRA has since been amended to ensure it complies with the updated regulations.

Table 2.1: SA framework for the Rugby Borough Council Local Plan

SA objectives	Sub-questions	Relevant topic(s) as set out in the SEA Regulations
1. Reduce/eliminate poverty, disadvantage and social exclusion	<ul style="list-style-type: none"> • Will it promote or support employment opportunities across the Borough for the most deprived wards? • Will it encourage active involvement of local people in community activities? • Will it maximise opportunities for all members of society? • Will it reduce fuel poverty? • Will it maintain and enhance rural facilities? 	<ul style="list-style-type: none"> • Population • Human health
2. Provide good quality local services, leisure and cultural opportunities with good access for all sections of the community	<ul style="list-style-type: none"> • Will it promote good quality local services with good access for all sections of the community? • Will it promote mixed-use development with good accessibility to local services that will reduce the need to travel? • Will it provide a range of leisure and cultural opportunities for all? 	<ul style="list-style-type: none"> • Population • Human health • Material assets
3. Promote/improve health of the population and reduce health inequalities	<ul style="list-style-type: none"> • Will it promote healthy, active lifestyles through the protection and provision of facilities and locations of sporting/recreational activities (e.g. playing fields, sports facilities, cycleways, footpaths etc.)? • Will it reduce obesity? • Will it improve access for all to health facilities? 	<ul style="list-style-type: none"> • Population • Human health
4. Provide affordable and decent housing, which meets the needs of the Borough	<ul style="list-style-type: none"> • Will it provide an adequate supply of affordable housing? • Will it support the provision of a range of house types and sizes to meet the needs of all sectors of the community? • Will it reduce homelessness? • Will it provide a decent home for all? • Will it ensure that all new development contributes to local distinctiveness and improve the local environment? • Will it meet the building specification guidance in the Code for Sustainable Homes? 	<ul style="list-style-type: none"> • Material assets
5. Reduce crime, fear of crime and anti-social behaviour	<ul style="list-style-type: none"> • Will it reduce crime, fear of crime and anti-social behaviour? • Will it promote design of buildings and public spaces to reduce the potential of crime? 	<ul style="list-style-type: none"> • Population

SA objectives	Sub-questions	Relevant topic(s) as set out in the SEA Regulations
6. Promote/enable a strong, stable and sustainable local economy	<ul style="list-style-type: none"> • Will it provide employment opportunities for all? • Will it improve business development and enhance competitiveness? • Will it assist businesses in finding appropriate land and premises? • Will it support the rural economy and farm diversification? • Will it promote sustainable tourism opportunities? • Will it support or encourage social enterprise and the development of new environmental technologies? 	<ul style="list-style-type: none"> • Population • Material assets
7. Promote the vitality and viability of the town centre	<ul style="list-style-type: none"> • Will it promote Rugby as a destination of choice of shopping? • Will it improve the quality of the public realm? • Will it make land and property available for a range of different business needs within the town centre? 	<ul style="list-style-type: none"> • Material assets
8. Promote the regeneration of urban areas	<ul style="list-style-type: none"> • Will it provide affordable housing and decent homes? • Will it allow access for all? • Will it assist businesses in finding appropriate land and premises? • Will it provide employment opportunities for all? • Will it promote design of buildings and public spaces to reduce the potential of crime? • Will it ensure the provision of new development, including conversions, on previously developed land as opposed to greenfield sites and through conversion of existing buildings? • Will it require good design to create attractive, high quality environments where people will choose to live, work and/or spend leisure time? • Will it improve people's satisfaction with their neighbourhood? • Will it ensure development is co-ordinated with essential infrastructure to support future sustainable growth? 	<ul style="list-style-type: none"> • Material assets
9. Use and manage land, energy, soil, mineral and water resources prudently and efficiently, and increase energy generated from renewables	<ul style="list-style-type: none"> • Will it exacerbate water abstraction levels? • Will it increase water consumption? • Will it include energy efficiency measures? • Will it encourage energy production from sustainable sources? • Will it safeguard Rugby's material resources for future use? • Will it utilise derelict, degraded and under-used land and buildings? • Will it lead to reduced consumption of materials and resources? • Will it lead to higher density development? 	<ul style="list-style-type: none"> • Soil • Water • Material assets
10. Minimise waste and manage it sustainably	<ul style="list-style-type: none"> • Will it reduce the amount of waste produced? • Will it maximise the recovery, re-use and recycling of waste? • Will it promote 'on-site' sustainable waste management facilities within new developments? 	<ul style="list-style-type: none"> • Material assets

SA objectives	Sub-questions	Relevant topic(s) as set out in the SEA Regulations
11. Reduce the Borough's contribution to climate change	<ul style="list-style-type: none"> • Will it reduce non-renewable energy consumption and greenhouse gas emissions? • Will it help reduce Rugby's carbon footprint? • Will it reduce the rate of increase in transport-related carbon and greenhouse gas emissions by reducing the need for private car use? • Will it require that development proposals are guided by 'climate proofing' principles (to allow an increase in use of renewable energies in the future)? 	<ul style="list-style-type: none"> • Climatic factors
12. Avoid, reduce and manage flood risk	<ul style="list-style-type: none"> • Will it minimise the risk of flooding from rivers and watercourses to people and property? • Will it reduce the risk of damage to property from storm events? • Will it increase the number of new developments that incorporate sustainable drainage techniques including SuDS? 	<ul style="list-style-type: none"> • Water
13. Conserve and enhance the historic environment, heritage assets and their settings.	<ul style="list-style-type: none"> • Will it preserve buildings of architectural or historic interest and, where necessary, encourage their conservation and renewal? • Will it preserve or enhance archaeological sites/remains? • Will it improve and broaden access to, understanding and enjoyment of the historic environment? • Will it support heritage-led regeneration and capitalise on the social and economic contribution of the historic environment to the regeneration of the Borough? • Will it preserve or enhance the setting of cultural heritage assets? • Will it safeguard and enhance the character of the landscape/townscape and local distinctiveness and identity? • Will it reduce the amount of derelict, degraded and under-used land? • Will it increase the economic benefit derived from the historic environment (e.g. promoting heritage based tourism)? • Will it support the sustainable use of historic farmsteads? 	<ul style="list-style-type: none"> • Cultural heritage including architectural and archaeological heritage
14. Promote a sustainable and accessible transport network	<ul style="list-style-type: none"> • Will it promote the use of sustainable modes of transport? • Will it promote mixed-use development that reduces reliance on the private car? • Will it provide good access to services/facilities for all? • Will it promote travel plans, car share schemes? • Will it promote the development of park and ride schemes? • Will it reduce traffic volumes? • Will it reduce the negative environmental impacts of transport? 	<ul style="list-style-type: none"> • Material assets

SA objectives	Sub-questions	Relevant topic(s) as set out in the SEA Regulations
15. Reduce all forms of pollution	<ul style="list-style-type: none"> • Will it maintain and improve local air quality? • Will it improve levels of noise, light pollution, odour and vibration? • Will it maintain and improve the biological and chemical water quality of water bodies in the Borough? • Will it minimise soil contamination and improve soil quality? • Will it minimise diffuse as well as point source pollution? • Will it promote more sustainable transport patterns, particularly in areas of low air quality (e.g. AQMAs)? • Will it separate polluting development away from sensitive receptors? 	<ul style="list-style-type: none"> • Soil • Water • Air
16. Conserve and where possible enhance the Borough's biodiversity, flora and fauna	<ul style="list-style-type: none"> • Will it lead to habitat creation, matching BAP priorities? • Will it conserve and enhance species diversity and in particular avoid harm to protected species? • Will it maintain and enhance sites designated for their nature conservation interest? • Will it maintain and enhance woodland/hedgerow cover and management? • Will it maintain and enhance sites designated for their geodiversity interest? • Will it increase awareness of biodiversity and geodiversity issues? • Will it encourage the development of new biodiversity assets and linkages to existing habitats within/alongside development? • Will it increase the provision of and access to green infrastructure? 	<ul style="list-style-type: none"> • Fauna • Flora
17. Maintain and where possible enhance the quality of landscapes	<ul style="list-style-type: none"> • Will it safeguard and enhance the character of the landscape and local distinctiveness and identity? • Will it reduce the amount of derelict, degraded and under-used land? • Will it preserve distinctive historic landscapes? 	<ul style="list-style-type: none"> • Landscape
18. Maintain and where possible enhance the quality of townscapes	<ul style="list-style-type: none"> • Will it maintain and enhance the character of the townscape and local distinctiveness and sense of place? • Will it reduce the number of derelict, under-used and vacant buildings? • Will it achieve high quality and sustainable design for the built environment sensitive to the locality? 	<ul style="list-style-type: none"> • Material assets • Cultural heritage including architectural and archaeological heritage

3 How the Environmental/SA Report has been taken into account

- 3.1 As already stated, the SA process for the Local Plan was undertaken iteratively, such that an assessment of the sustainability and environmental effects was made at each stage of the Local Plan's development.
- 3.2 The SA assessed each of the policies and proposals in the Local Plan and all reasonable alternatives to these and this helped the Council to formulate its approach with regards to which options to take forward. A summary of the reasons for selecting or not selecting each site option were set out in Appendix 7 of the 2016 SA Report, which includes considerations from the SA, as well as wider planning considerations. Chapter 1 of the SA Addendum explains that no further reasonable alternatives requiring SA were identified at the Main Modifications Stage. However, Appendix 2 of the SA Addendum comprises the schedule of Main Modifications prepared by Rugby Borough Council, which includes the reasons for including each proposed Main Modification.
- 3.3 Chapter 6 of the 2016 SA Report also includes a section outlining the recommendations for the Local Plan made through previous iterations of the SA and how these were addressed in the Local Plan.
- 3.4 **Table 3.1** shows how preparation of the SA Reports (which included the Environmental Report requirements) corresponded with each stage of the Local Plan preparation, and how the SA was taken into account.

Table 3.1: Iterations of the Rugby Borough Council Local Plan and accompanying SA work

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
N/A	Sustainability Appraisal Scoping Report for the Rugby Borough Plan and Gypsy and Traveller Site Allocation Development Plan Document (March 2013)	<p>The scoping stage involved compiling baseline information about the social, economic and environmental issues for the plan area as well as the policy context. The SA framework was then developed, setting out the SA objectives against which plan options initially, and subsequently policies, would be appraised.</p> <p>This stage set the scope for the SA, rather than assessing any element of the Local Plan.</p>
Discussion Document (June 2013)	Rugby Borough Local Plan Discussion Document Sustainability Appraisal Report (June 2013)	<p>The Discussion Document sought to identify existing policy gaps and proposed an approach to address each one. The SA assessed the proposed approaches. A draft version of the Discussion Document was subject to SA and the draft SA Report was shared with the Council in order for them to be taken into account when finalising the document. The SA was then updated to reflect the final document.</p> <p>Chapter 4 of the SA of the Discussion Document sets out the recommendations made in the draft SA Report and how these were addressed in the final version of the Discussion Document. It was noted that some recommendations would be more appropriately considered once the full policy wording was drafted.</p>
Rugby Borough Emerging Local Plan: Preferred Option (December 2015)	<p>Sustainability Appraisal of Policy Options for Rugby Local Plan (May 2015)</p> <p>Rugby Borough Emerging Local Plan: The Preferred Option Sustainability Appraisal Report (December 2015)</p>	<p>Following publication of the Discussion Document, the Council decided to produce a new Local Plan in place of the previous Core Strategy. This represented an increase in scope of the emerging plan and therefore an additional suite of options was identified to cover the policy areas not considered in the Discussion Document. Due to the time elapsed between previous stages, all options (both previously assessed and new) were subject to SA.</p> <p>The SA of Policy Options (May 2015) was an internal summary note setting out all policy options for the Local Plan and their performance against the SA objectives. These results were sent to the Council and informed the Council’s decisions of which options to take forward when preparing the Local Plan Preferred Option.</p> <p>The SA of the Preferred Option assessed the preferred draft of the Local Plan, from the options assessed previously. At this stage, the Council had also identified site allocation options, therefore the SA assessed site options at this stage. The Council took the assessment results into account when preparing the Publication Draft Local Plan. Chapter 6 of the Preferred Option SA included recommendations to enhance the sustainability of the Local Plan. Chapter 6 of the 2016 SA Report contains a section explaining how these recommendations were addressed.</p>

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
Rugby Borough Council Local Plan – 2011-2031: Publication Draft (September 2016)	Rugby Borough Council Local Plan 2011-2031: Publication Draft Sustainability Appraisal Report (September 2016)	<p>The Publication Draft Local Plan included detailed policies and included sites to be allocated for development. This included some updates from previous versions of the Local Plan, therefore the SA was updated to reflect these.</p> <p>The SA concluded that the allocated development sites in the Local Plan would generally have fewer significant negative effects than the alternative options considered and while some potential negative effects do exist, these generally reflect the widespread constraints within the Borough, for example in terms of the broad extent of high quality agricultural land and the wide distribution of biodiversity and geodiversity designations. The SA also concluded that the Local Plan policies should go a long way towards mitigating the potential negative effects of the development proposed.</p> <p>As the Local Plan at this stage was a draft as proposed to be adopted, the purpose of the SA was to inform consultees and the Inspector on the sustainability implications of the plan. However, had any major issues been identified, the Council would have proposed modifications to the plan.</p>
Rugby Borough Local Plan – 2011-2031 – Publication Draft, Table of Main Modifications (August 2018)	Rugby Borough Local Plan: Main Modifications, Sustainability Appraisal Addendum (August 2018)	<p>Following the Examination hearings the Inspector advised that Main Modifications to the plan were required in order to make the plan legally compliant and sound. The SA Addendum considered the implications of the Main Modifications for the previous SA findings. As explained above, no additional reasonable alternatives were identified at this stage. The SA concluded that the Main Modifications would result in a number of changes to the SA scores previously identified and set these out in Table 2 of the Addendum. The Main Modifications and SA Addendum were subject to public consultation.</p> <p>At this stage the role of the SA was to inform the Council and Inspector of the implications of the Main Modifications, rather than to propose further changes to the Plan. However, had any major issues been identified, the further modifications could have been proposed.</p>
Rugby Borough Council Local Plan – 2011-2031: as adopted (June 2019)	SA/SEA Post-Adoption Statement (June 2019) (this document)	<p>Following consultation on the Main Modifications and the SA Addendum Report, the Inspector’s Report concluded that, with the inclusion of recommended Main Modifications, the Local Plan satisfies the requirements of Section 20 (5) of the Planning and Compulsory Purchase Act 2004 and meets the criteria for soundness in the National Planning Policy Framework. The Inspector made some amendments to the detailed wording of the Main Modifications and added consequential modifications where necessary for consistency or clarity. However, the Inspector stated that none of the amendments significantly altered the content of the Main Modifications previously assessed, therefore the SA and consultation process would not be undermined by these further changes, therefore no further SA assessment work was required.</p>

4 How opinions of consultation bodies and the public have been taken into account

- 4.1 During the early stages of the Local Plan preparation the SA Scoping Report was subject to consultation with the statutory consultation bodies specifically relating to the SEA Directive i.e. the Environment Agency, Natural England and English Heritage (now Historic England). The later stages of the Local Plan were open to public consultation. The SEA Regulations require the SEA Adoption Statement to summarise how any opinions expressed by the public and the consultation bodies in relation the SEA have been taken into account.
- 4.2 The Local Plan consultation stages and responses received relating to the SA documents are summarised below.

SA Scoping

- 4.3 The SA Scoping Report was published in March 2013 for a five week consultation period with the statutory consultees that existed at the time (Natural England, the Environment Agency and English Heritage (now Historic England)).
- 4.4 The Scoping Report provided the opportunity for consultees to comment on a number of issues, including whether the objectives in the SA framework provided a reasonable framework for assessing the likely significant effects of the Local Plan and whether the review of relevant plans, policies and programmes (the PPP review) and baseline information were appropriate and complete.
- 4.5 Appendix 1 of the 2016 SA Report lists the comments that were received during the Scoping consultation and describes how each one has been addressed. In light of the comments received a number of amendments were made to the review of plans, policies and programmes, the baseline information and the key sustainability issues during the preparation of the SA Report for the Discussion Document. In addition, the review of plans, policies and programmes and the baseline information were subject to a general update at each stage of the SA, to ensure that they reflected the current situation in Rugby Borough.

Preferred Option Local Plan

- 4.6 The Discussion Document and Preferred Option Local Plan are considered together here, as the SA for the Preferred Option Local Plan superseded the SA of the Discussion Document. This is because the consultation questions that were included in the Discussion Document related to whether a separate DPD (the Rugby Borough Plan) should in fact be produced to sit alongside the adopted Core Strategy, or whether the two documents should instead be merged into one DPD. The responses received by the Council indicated that the preference amongst consultees was for the production of a single DPD and therefore the Council went back to ensure all relevant options were considered. At the Preferred Option stage, the SA assessed all relevant options, including policy and site allocation options.
- 4.7 The SA Report for the Preferred Option Local Plan was subject to consultation between December 2015 and February 2016.
- 4.8 Appendix 1 of the 2016 SA lists the consultation comments received, including how the matters raised were addressed by the SA. Many consultation responses related to specific development management policies, and how the SA had identified effects in relation to these. Others questioned the alternatives assessed or made general comments about the approach of the SA.

- 4.9 A further call for sites exercise was held alongside the consultation on the Preferred Option, which led to the Council identifying a further 46 reasonable alternative residential site options, which were assessed at the next stage of SA.

Publication Draft Local Plan

- 4.10 The Publication Draft Local Plan was subject to SA and underwent public consultation between September and November 2016. All responses collected that were 'duly made' were submitted to the Government for consideration by the Planning Inspector.
- 4.11 The majority of comments received related to site allocations in the Publication Draft Local Plan (particularly DS10: Lodge Farm), and reasonable alternative site allocations considered during the Local Plan preparation process. Most challenged the SA scores for sites, and a small number of consultees raised concerns regarding the SA process and how the SA findings were taken into account by Rugby Borough Council when deciding which sites should be included as allocations in the Publication Draft Local Plan, and which should not.
- 4.12 LUC used a consistent approach throughout for the site appraisals, using a set of SA assumptions presented in Appendix 4 of the 2016 SA Report. This enabled each site to be appraised on its own merits, prior to mitigation. The Council used this information, and its own evidence base and consideration of consultation responses, in order to select sites for inclusion in the Local Plan.
- 4.13 LUC reviewed the comments received and concluded that none of these had material implications for the SA, therefore no further SA work was required at this stage.

Main Modifications

- 4.14 The Main Modifications and accompanying SA Addendum (which considered the implications of Main Modifications for the SA) were published for consultation between August and October 2018. These documents and the consultation responses received were sent to the Inspector for consideration.

5 Why the adopted Rugby Borough Council Local Plan was chosen in light of reasonable alternatives

- 5.1 The options or reasonable alternatives considered during the development of the Local Plan included policy options and a range of site options, including potential site allocations for residential and employment development. The stages that were involved in assessing and refining the plan options are summarised below.

Identification and appraisal of policy options

- 5.2 High level options for the policies that were originally intended to be included in the Rugby Borough Plan were identified and presented in the Discussion Document in 2013. Those options were subject to SA by LUC at that time, with the findings described in the June 2013 SA Report. Reasonable alternative options for those policies were identified by the Council and were drawn from the most up-to-date evidence and guided by the national level policy set out in the NPPF.
- 5.3 Once the decision was taken to produce a full new-style Local Plan in place of the Rugby Borough Plan, it was necessary to identify and appraise options for the other policies that would be included, i.e. the strategic policies relating to how much development would take place and where it would be located. The Council therefore identified a further set of reasonable alternative policy options and these were subject to SA by LUC in May 2015. The SA matrices for these additional policy options were provided to the Council in the form of an internal SA summary note so that the findings could inform the preparation of the Local Plan Preferred Option. This summary note was a working document intended to inform the plan preparation process rather than a full SA report and was not made publicly available at the time (the findings of that stage of work were later presented in Chapter 5 of the SA Report for the Preferred Option (December 2015)). The SA findings for the options previously set out in the Discussion Document and presented in the June 2013 SA Report also informed the Council's decision making about which of those options to take forward into draft Local Plan policies, along with other factors.
- 5.4 Once the Council had produced the Local Plan Preferred Option the more detailed draft policies (including preferred site allocations) were also subject to SA and the findings were presented the December 2015 SA Report for the Preferred Option. The Council took into account the findings of this stage of SA work when preparing the current version of the Local Plan, the Publication Draft. The SA work for the Local Plan policies and site allocations were updated to reflect the changes made since the Preferred Option stage and this was presented in the SA of the Publication Draft Local Plan.

Identification and appraisal of site options

- 5.5 An initial set of reasonable alternative options for the residential and employment sites to be allocated in the Local Plan was identified by Rugby Borough Council and these site options were subject to SA by LUC prior to the Preferred Option consultation.
- 5.6 Residential sites that were identified through a 'Call for Sites' exercise and the Council's Strategic Housing Land Availability Assessment (SHLAA) were taken as the starting point and were subject to a sieving exercise by Council officers to identify any that were not considered to be reasonable and so would not require SA. Those sites which were smaller than the SHLAA site threshold of 0.2ha or that were being promoted for another land use such as employment, retail or Gypsy and Traveller pitches were not considered to be reasonable options for residential development. All other SHLAA submission sites were selected as reasonable options for residential sites and were subject to SA.

- 5.7 The Council identified employment sites through desktop research and a 'Call for Sites' exercise. The SHLAA focused on residential sites, although some submissions included details of employment land to be incorporated as well.
- 5.8 Once the Council had completed the site sieving exercise, 142 reasonable residential site options and five reasonable employment site options were identified and subject to SA by LUC in accordance with the methodology described further ahead in this chapter. The findings were presented in a summary SA document which was made available to the Rugby Borough Council officers preparing the Local Plan in September 2015. This was a working document intended to inform the plan preparation process rather than a full SA report and was not made publicly available at the time (the findings of that stage of work were later presented in Chapter 4 of the SA Report for the Preferred Option (December 2015)).
- 5.9 The Council took into account the findings of the SA as well as other relevant factors when deciding which residential and employment sites to include in the Preferred Option and which site options to reject. Appendix 7 in the SA Report for the Preferred Option listed the site options considered and stated whether or not each one was included as a preferred site allocation at that stage, also giving the Council's reasons for selecting or rejecting each site at that stage.
- 5.10 A further Call for Sites exercise was held alongside the consultation on the Preferred Option between December 2015 and February 2015, and this led to the Council identifying a further 46 reasonable alternative residential site options. The Council considered all sites that were submitted during the consultation and identified those that it considered to be reasonable options for SA by identifying only those sites that accord with the distribution strategy that was set out in the Preferred Option Local Plan (and which has been subject to SA during the Plan preparation process). On that basis, reasonable alternative sites were taken to be those that were located on the urban edge of Rugby town, that were adjacent to or within main rural settlements or that are within the open countryside/Green Belt and were of sufficient scale to accommodate a new settlement. One new employment site option was also identified through that further Call for Sites exercise.
- 5.11 The 46 new residential site options and the new employment site option were subject to SA and the findings are presented in Chapter 4 of the 2016 SA Report along with the SA findings for the residential and employment site options appraised previously. Ten of the new residential site options were alternative, larger or smaller areas of site options that had already been submitted and appraised at the previous stage – these alternative areas were submitted during the second Call for Sites exercise.
- 5.12 The Council's reasons for selecting or not selecting site options are included in Appendix 7 of the 2016 SA Report. These include reasons relating to the SA as well as wider planning issues. For example, many sites were not taken forward on the basis that they had poor access to local services or would have a significant adverse impact on landscape character.

6 How will the environmental and sustainability effects of the Local Plan be monitored?

- 6.1 The SEA Regulations require that “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*” (Regulation 17), and that the environmental report should provide information on “*a description of the measures envisaged concerning monitoring*” (Schedule 2).
- 6.2 The Government’s latest SA Guidance in the National Planning Practice Guidance (PPG) states that proposals for monitoring the potential significant effects should be included in the Sustainability Appraisal report, or the Post-Adoption Statement. Monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Therefore, monitoring measures have been proposed in this SA Report in relation to only those SA objectives in the SA framework for which likely (or uncertain) significant positive or negative effects were identified from the Publication Draft Local Plan and SA Addendum.
- 6.3 **Table 6.1** sets out a number of indicators for monitoring the potential significant effects of implementing the Local Plan. Where possible, the indicators proposed draw from those in the monitoring framework prepared by Rugby Borough Council and presented in the Publication Draft Local Plan.
- 6.4 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the Council continues the dialogue with statutory environmental consultees and other stakeholders that has already been commenced, and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 6.1: Proposed Monitoring Framework for the Rugby Local Plan

SA objectives for which likely (or uncertain) significant positive or negative effects have been identified for the Publication Draft Local Plan	Proposed monitoring indicators
2. Provide good quality local services, leisure and cultural opportunities with good access for all sections of the community	<ul style="list-style-type: none"> • Amount of new and loss of community facilities (sqm) • Amount of additional 'town centre use' floorspace provided in Rugby town centre • Amount of open space and sport and recreation facilities
3. Promote/improve health of the population and reduce health inequalities	<ul style="list-style-type: none"> • Life expectancy • Number of new healthcare facilities provided • Infant mortality rates • Obesity rates • Number of people living with a disability • Percentage of people regularly participating in sport • Number of new developments that submit a Health Impact Assessment
4. Provide affordable and decent housing, which meets the needs of the Borough	<ul style="list-style-type: none"> • Supply and delivery of allocated sites • Affordable housing completions • Average house prices • Number of people in housing need (SHMA) • Annual housing completions –total houses built, types, sizes and tenures • Total vacant dwellings • Total number of Gypsy and Traveller pitches • Number of statutory homeless people • Number or proportion of local authority homes falling below Decent Homes Standards • Supply, delivery and type of new Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation
6. Promote/enable a strong, stable and sustainable local economy	<ul style="list-style-type: none"> • Amount of new employment land delivered • Amount of employment land lost to alternative uses • Supply and delivery of new retail premises • Number of people claiming Jobseekers' Allowance
7. Promote the vitality and viability of the town centre	<ul style="list-style-type: none"> • Amount of additional 'town centre use' floorspace provided in Rugby town centre
8. Promote the regeneration of urban areas	<ul style="list-style-type: none"> • Percentage of development taking place on previously developed land
9. Use and manage land, energy, soil, mineral and water resources prudently and efficiently, and increase energy generated from renewables	<ul style="list-style-type: none"> • Percentage of development taking place on previously developed land • Number of planning applications approved within a Minerals Consultation Area • Amount of development that takes place on best and most versatile agricultural land • Number of buildings built each year above required building standards for energy efficiency • Number of dwellings that meet the required water efficiency target

SA objectives for which likely (or uncertain) significant positive or negative effects have been identified for the Publication Draft Local Plan	Proposed monitoring indicators
11. Reduce the Borough's contribution to climate change	<ul style="list-style-type: none"> • Number of new developments incorporating low carbon technologies • Installed renewable energy capacity
12. Avoid, reduce and manage flood risk	<ul style="list-style-type: none"> • Amount of housing and employment land delivered within flood zones 2 and 3 • Number of planning permissions granted contrary to EA advice • Number of new developments incorporating SUDS
13. Conserve and enhance the historic environment, heritage assets and their settings.	<ul style="list-style-type: none"> • Number of entries on the Heritage at Risk Register
14. Promote a sustainable and accessible transport network	<ul style="list-style-type: none"> • Proportion of people who travel to work by public transport • Railway Station footfall • Bus patronage levels • Number of Travel Plans implemented with new development • Number of users of cycle paths
15. Reduce all forms of pollution	<ul style="list-style-type: none"> • Number of Air Quality Management Areas declared • Number of planning permissions granted contrary to sustained objection of the Environment Agency on water quality grounds
16. Conserve and where possible enhance the Borough's biodiversity, flora and fauna	<ul style="list-style-type: none"> • Amount of greenfield land lost to development • Change in condition of SSSIs • Number of Local Wildlife Sites • Amount of development that takes place on Local Green spaces
17. Maintain and where possible enhance the quality of landscapes	<ul style="list-style-type: none"> • Percentage of new development taking place on brownfield land
18. Maintain and where possible enhance the quality of townscapes	<ul style="list-style-type: none"> • Percentage of development taking place on previously developed land

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