

Sustainability Appraisal of the Rugby Local Plan: Clarification Note for the Inspector

This clarification note addresses queries that were raised during the hearing session on Tuesday 23rd January 2018 regarding some changes that were made to SA scores between the versions of the SA Report that were prepared for the Preferred Options Local Plan (December 2015) and the Publication Draft Local Plan (September 2016).

These queries were raised by SALFV for the first time during the first day of the hearings and did not form part of SALFV's written statement relating to Issue 1b. Therefore, as stated during the hearings, it was necessary to revisit our records in order to provide a full and accurate response, due to the detailed nature of the query and the time that has passed since preparation of the SA Reports as well as the scale of the appraisal work undertaken.

During the hearing session, SALFV highlighted differences in the scores attributed to development strategy option 2 (urban and urban edge focus) in the SA reports for the Preferred Options and Publication Draft Local Plan, as summarised in Tables 5.2 and 5.9 respectively in those reports. A summary of the score changes is provided below:

- The score for SA objective 8 (regeneration) changed from significant positive (++) at Preferred Options stage to minor positive (+) at Publication Draft stage.
- The score for SA objective 9 (resources) changed from uncertain significant positive (++?) at Preferred Options stage to uncertain minor positive (+?) at Publication Draft stage.
- The score for SA objective 10 (waste) changed from uncertain significant positive (++?) at Preferred Options stage to uncertain minor positive (+?) at Publication Draft stage.
- The score for SA objective 17 (landscape) changed from uncertain minor negative (-?) at Preferred Options stage to uncertain significant negative (--?) at Publication Draft Stage.

In summary, the changes described above were made as a result of changes in our professional judgement about the likely effects of the 'urban and urban edge focus' option (Option 2), based on a better developed understanding of what that development strategy option would involve.

Option 2 was originally considered likely to have a potential minor negative effect (-?) on SA objective 17 (landscape), based on the judgement that it would involve some boundary alterations at the main rural settlements which could have a negative effect on the landscape if this were to alter the scale and form of the settlement. However, any such impacts were expected to be minor as the development would still be part of an existing settlement. It was noted that the option could also involve urban extensions at Rugby town which may have impacts on the landscape depending on their location and design. Overall, for these reasons, an uncertain minor negative (-?) effect was considered to be the most appropriate score at Preferred Options stage. This was changed to uncertain significant negative (--?) effect at Publication Draft stage because (through discussions with Council officers) it was recognised that Option 2 could in fact involve some development in the open countryside. Option 2 states that if Rugby's urban edge cannot meet all the strategic growth, then additional growth will be focused on Coventry's edge – this would also be on land that is open countryside. On reflection it was therefore considered inappropriate that Option 2 should score less favourably with regards to impacts on the landscape than Option 5 (new town) which was considered to have a potential significant negative effect due to the option involving development in the open countryside.

This same fundamental issue also resulted in the changes that were made to the scores for SA objectives 8, 9 and 10 described above. Because it was recognised that Option 2 could in fact result in some development in the open countryside, it was considered to be inappropriate that the option scored the same as Option 4 (intensified urban focus) in relation to SA objectives 8, 9 and 10. The development in the open countryside that could be associated with Option 2 could result in less positive effects on regeneration (SA objective 8) in comparison with an intensified urban focus (Option 4) and it was considered appropriate for the SA scoring to reflect this. Similarly, the fact that some development could

take place in the open countryside under Option 2 meant that it was considered appropriate to reduce the positive effect on SA objectives 9 (efficient land use) and 10 (waste) in comparison to Option 4 as even limited development in the countryside is likely to involve more development on greenfield land compared an intensified urban focus (Option 4). While development in the open countryside is not the main focus of Option 2, the fact that it could be involved should be recognised in the SA.

In summary, it was considered (based on our evolving understanding of what Option 2 would look like) that more differentiation should be made between Options 2 and 4 in relation to the above SA objectives, to reflect the fact that Option 2 could involve some development in the open countryside. On that basis, it was appropriate that the option scored more similarly to Options 1, 3 and 5 than Option 4 for certain SA objectives.

The changes to the summary text in Chapter 5 of both reports reflect the above score changes. Full justification for the scores attributed to each option at each stage can be found in the detailed SA matrices in Appendix 8 of both reports.

It should be recognised that the SA is an iterative process and we consider it to be entirely appropriate that judgements about the likely effects of options are reviewed throughout the process, and that this may result in changes being made to scores. The SA should respond to new evidence and changing circumstances and if the SA were not to evolve similarly there could be criticism that the approach lacks flexibility.

It should also be noted that the SA process was undertaken by external consultants (LUC) working independently on behalf of the Council. While Council officers had the opportunity to comment on draft reports prepared by LUC, judgements made about the likely effects of options were made independently by the LUC team carrying out the SA.

LUC
25th January 2018