

Nicola Smith  
Strategic Director for Place  
Rugby Borough Council

Ref: LDF002324

Date: 12 June 2026

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Dear Ms Smith,

### **Rugby Local Plan Examination - Inspectors' Initial Questions**

Having reviewed the Sustainability Appraisal Scoping Report [CD21], Sustainability Appraisal Report (2025) [RBC1] and Sustainability Appraisal Final Report [CD5] and non-technical summary [CD6], we would be grateful if the Council could respond to the following initial questions in respect of the submitted Sustainability Appraisal (SA) documentation.

#### **Issue: Compliance with Strategic Environmental Assessment (SEA) Requirements**

It is currently unclear to us how certain requirements of the SEA Regulations have been addressed within the submitted SA.

1. Please provide a clear explanation and precise references to the relevant section(s) of the submitted SA Final Report to demonstrate that the following have been undertaken:
  - a) assessment of the likely evolution of the environment in the absence of the submission Local Plan
  - b) identification of the environmental characteristics of areas likely to be affected
  - c) summary of the key existing environmental problems, including those affecting protected or sensitive areas of particular importance within the Borough
  - d) explanation of relevant international, EU, and national environmental objectives and how these have been considered
  - e) the approach to identifying and selecting reasonable alternatives; and
  - f) demonstration that the SA methodology has been applied consistently in assessing all reasonable alternatives across all policies and proposals in the Submission Plan.

## **Issue: How the reasonable alternative options were identified and assessed**

### Link between SA and the preferred strategy

The SA identifies the Council's preferred approach; however, it is unclear to us how it demonstrates that its findings have informed the final strategy, and how differences in the performance of reasonable alternatives have been assessed and weighed in selecting the preferred option.

2. Please clearly demonstrate how the SA has led to the selection of the preferred strategy. Where alternatives perform differently, explain how those differences have been evaluated and balanced in reaching the final Plan.

### Approach to Gypsies and Travellers needs

The SA appears to present a single approach to meeting the needs of Gypsies, Travellers and Travelling Showpeople.

3. Please clarify whether alternative approaches, including for transit stop over provision and the inclusion of windfall policy criteria, were considered and upon what basis any were discounted.
4. Please explain how the chosen approach has been assessed against other reasonable alternatives.

### Development management policy alternatives

The SA states that it has not identified reasonable alternatives for development management policies.

5. How were reasonable alternative development management policy options scoped out, and on what grounds is the conclusion that no such alternatives exist supported?
6. How does the SA demonstrate that the Plan was tested as a whole, rather than focusing primarily on the spatial strategy and sites?

### Strategy and sites

We note that the SA appears to focus primarily on "growth scenarios".

7. Can you explain why alternatives have been defined in this way, rather than assessing different site options and/or different combinations of sites?
8. Given the approach taken, how can we be satisfied that all reasonable alternatives have been fully identified, considered and compared?
9. Where there are key decisions between sites (for example alternative strategic employment locations), can you indicate where in the submitted SA documentation these options have been assessed against each other?

### Higher growth options

The SA considers higher growth by testing a range of growth scenarios and strategic site options.

10. Please explain how the higher growth options were assessed, and how their assessment outcomes compare with that of the preferred strategy.

### **Issue: How SA influenced site selection**

The submitted SA indicates that site options were assessed through earlier stages (for example through site assessment work) before the SA considered them in detail. It is unclear to us how the SA has influenced the shortlist of sites at different stages of plan preparation ahead of them being finalised as part of an iterative approach.

11. Please can you explain how the SA influenced site selection, providing documentary evidence and references to clearly show how and when sites were appraised, choices were made, and that the approach in the Plan has evolved in response to the different iterations of the SA throughout plan preparation. Where in the SA submission is a clear audit trail showing how reasonable alternatives were considered before arriving at the preferred options?

### Rejecting alternatives

The Regulations require clear reasons for choosing some site options and rejecting others. The SA Report sets out the preferred approach and discusses alternatives. However, in terms of how decisions were reached:

12. Please identify clearly where, within the submitted Sustainability Appraisal (SA), the reasons for rejecting alternatives are set out.
13. For sites that were promoted but not progressed, where is the explanation set out as to why they were not considered reasonable alternatives?

### Comparing reasonable alternative site options

The SA uses a set of sustainability objectives to evaluate options. Given that much of the assessment is narrative, it is unclear to us how reasonable alternative site options have been scored against the preferred option.

14. How have the different options been assessed and compared in a consistent way and where is this set out in detail in the evidence?
15. On what basis is the methodology clear for readers to understand why some options perform better than others?

### **Issue: Effects before and after mitigation**

The SA should identify measures to avoid, minimise, or compensate for adverse effects. The submitted SA refers to mitigation being delivered through plan policies and site-specific requirements.

16. Could you explain what the likely effects of the Submission Plan would be in the absence of mitigation, and to what extent mitigation is expected to lessen those effects?

### **Issue: Cumulative impacts**

It is unclear to us how the submitted SA clearly demonstrates how it has evaluated the overall combined effects of the Submission Plan.

17. Could you clarify how the SA has assessed the cumulative effects arising from the Plan in its entirety and as it has evolved?

### **Next steps**

The Council's response should be provided within the next 10 working days, if not sooner, in order that we may proceed to the publication of our Matters Issues and Questions in the coming weeks as previously indicated to you. Any difficulties in meeting this deadline should be communicated to us at the earliest possible time.

We may write to the Council about other issues that arise in the meantime.

We are not currently inviting responses from interested parties on the matters raised in this letter.

Yours sincerely,

*C Dillon, K Ford and J Glasin*

INSPECTORS