



Rugby Borough Gypsy and Traveller Site Allocations DPD Sustainability Appraisal

Rugby Borough Council

Final report

Prepared by LUC

June 2022

Version	Status	Prepared	Checked	Approved	Date
1	Draft report	H Ennis	K Nicholls	K Nicholls	22.06.2022
2	Final report	H Ennis	K Nicholls	K Nicholls	23.06.2022



Land Use Consultants Limited

Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

Rugby Borough Gypsy and Traveller Site Allocations DPD

Contents

Chapter 1 **1**

Introduction

The Plan Area	1
Rugby Borough Gypsy and Traveller Site Allocations DPD	4
Outline of the Issues and Options Rugby Borough Gypsy and Traveller Site Allocations DPD	4
Sustainability Appraisal and Strategic Environmental Assessment	5
Meeting the Requirements of the SEA Regulations	7
Structure of the SA Report	12

Chapter 2 **13**

Methodology

SA Stage A: Scoping	15
SA Stage B: Developing and refining options and assessing effects	19
SA Stage C: Preparing the Sustainability Appraisal Report	20
SA Stage D: Consultation on the DPD and the SA Report	21
SA Stage E: Monitoring implementation of the DPD	21
Appraisal methodology	21
Difficulties and Data Limitations	23

Chapter 3 **25**

Sustainability Context

Relationship with other Relevant Plans or Programmes	25
Policy Context	26
International	28
National	28

Contents

Other National Policies, Plans and Programmes	32
Key Local Plans, Policies and Programmes	41
Chapter 4	44
Sustainability Appraisal Findings for the DPD Options	
Chapter 5	82
Monitoring	
Chapter 6	90
Conclusions and Next Steps	
Appendix B	92
Scoping Consultation Comments	
Appendix C	94
Review of Relevant Plans, Policies and Programmes	
Appendix D	126
Baseline Information	
Appendix E	171
Site Assessment Criteria and Assumptions	
References	185

Contents

Table of Tables

Table 4.1: SA findings for Issues 1 and 2 options	50
Table 4.2: SA findings for Issue 3 option	56
Table 4.3: SA findings for Issue 4 options	61
Table 4.4: SA findings for Issue 5 options	71
Table 4.5: SA findings for Issue 6 options	76
Table C.1: Carbon dioxide emissions estimates in Rugby Borough 2005-2019	127
Table C.2: Changes in carbon dioxide emissions by sector for Rugby Borough between 2005 and 2019	128
Table C.3: Energy Consumption in Rugby Borough by type	131
Table D.4: Gypsy or Irish Traveller population by gender	133
Table D.5: Age Structure of Gypsy or Irish Traveller in Rugby Borough	133
Table D.6: Number of pitches required	135
Table C.7: Permanent Residential Pitches in Rugby Borough (2017)	136
Table C.8: Accommodation type by Ethnic Group	137
Table C.9: Tenure by Ethnic Group	138
Table D.10: Number of people in household	139
Table D.11: Employment Land Overview (ha)	143
Table D.12: Economic Activity by Ethnic group	144
Table C.13: Occupation by Ethnic Group	146
Table D.14: Renewable electricity installations in Rugby Borough	160

Table of Figures

Figure 1.1: Location of Rugby Borough	3
Figure 2.1: Corresponding stages in plan-making and SA	14
Figure 2.2: SA Framework symbol and colour coding	22
Figure 3.1: Relationship between the Rugby Borough Gypsy and Traveller DPD and other relevant plans or programmes	26
Figure D.1: Capital CO2 emissions compared to neighbouring authorities	130
Figure D.2: Indices of Multiple Deprivation	142
Figure D.3: Sustainable Transport Links	149
Figure D.4: Designated Biodiversity Assets	152

Contents

Figure D.5: Heritage Assets	155
Figure D.6: National Character Areas	159
Figure D.7: Agricultural Land Classification	164
Figure D.8: Watercourse in Rugby Borough	168
Figure D.9: Flood Risk	170

Chapter 1

Introduction

1.1 Rugby Borough Council commissioned LUC in March 2022 to carry out Sustainability Appraisal (SA) of the Rugby Borough Gypsy and Traveller Site Allocations Development Plan Document (DPD). The DPD will allocate land to meet the requirements for Gypsy, Traveller and Travelling Showpeople's accommodation, as identified by the latest Gypsy and Traveller Accommodation Assessment (GTAA). This report relates to the Issues and Options version of the DPD (to be published for consultation in September 2022) and it should be read in conjunction with that document.

1.2 It should be noted that this report was prepared on the basis of a draft version of the Issues and Options consultation document in June 2022 and that the authors did not have sight of the final consultation document.

The Plan Area

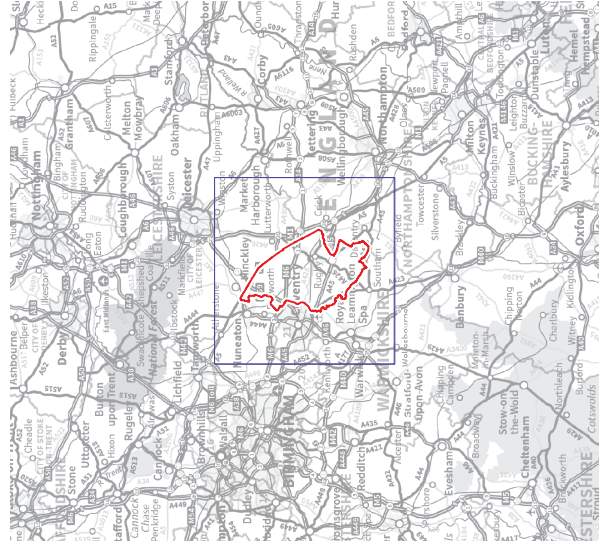
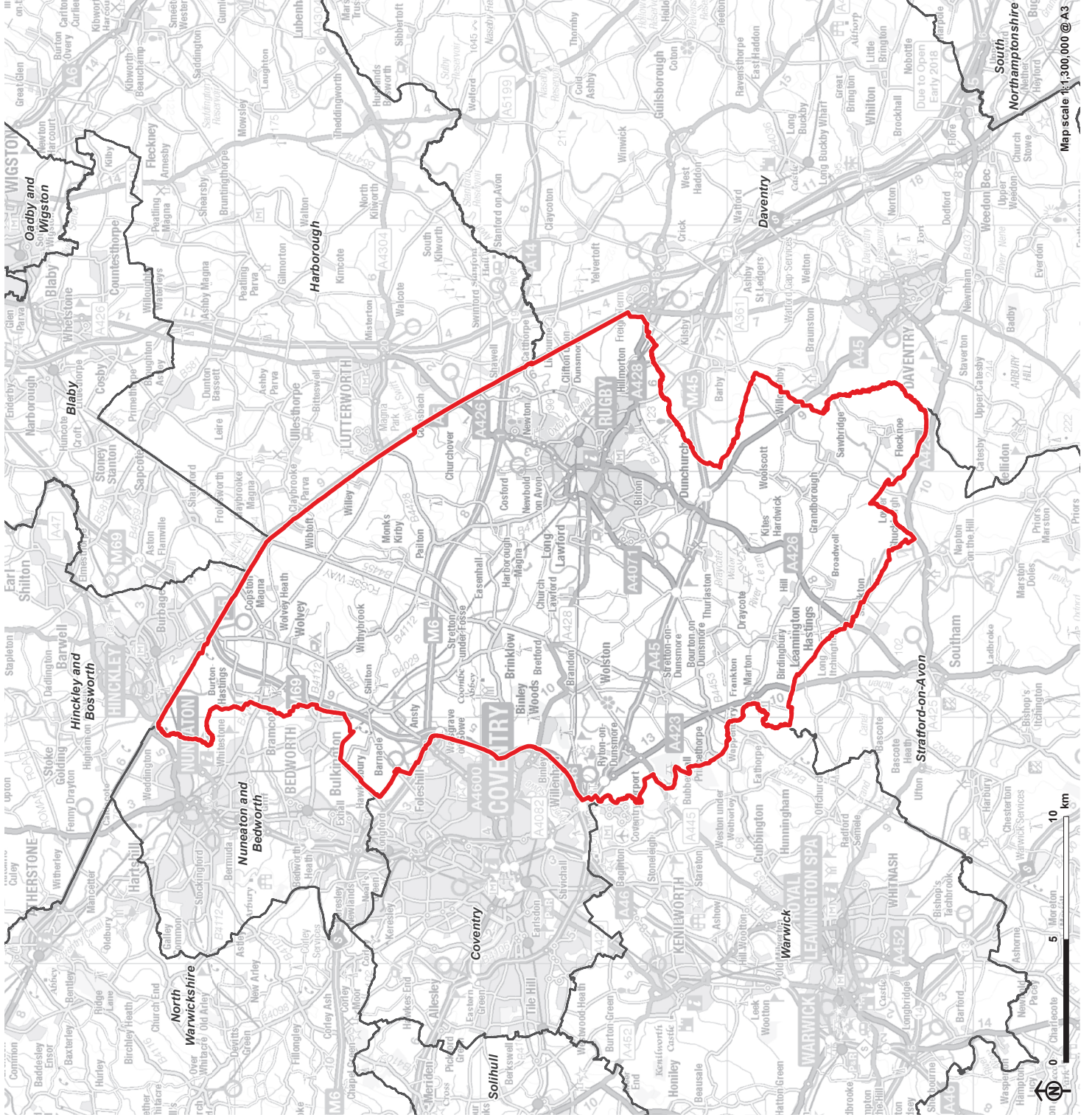
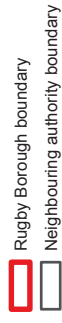
1.3 Rugby Borough lies within the county of Warwickshire on the eastern edge of the West Midlands. The Borough of Rugby covers an area of 351.2 km² with a population of 110,650 [See reference 1]. The Borough has 41 parishes and the largest centre of population is the attractive market town of Rugby, with two thirds of the Borough's population living in the town and the remainder residing in the rural area. The villages in the Borough range in size from 20 to 3,000 people.

1.4 Rugby town is the key hub for the provision of further and higher education, healthcare facilities, employment and shopping facilities. The Borough lies within close proximity of Coventry and Birmingham and is well-connected via railway links as well as the A45 to Coventry and the M6 to Birmingham.

Chapter 1

1.5 The location of the plan area is shown in Figure 1.1.

Figure 1.1: Location of Rugby Borough



Rugby Borough Gypsy and Traveller Site Allocations DPD

1.6 Rugby Borough Council adopted the Rugby Borough Local Plan 2011-2031 in June 2019. The adopted Local Plan outlines how the Borough will develop and grow over the plan period. The adopted Local Plan includes Policy DS2: Sites for Gypsy, Travellers and Travelling Showpeople, which sets out the requirement to allocate land through a separate Gypsy and Traveller Site Allocations DPD. Policy DS2 also sets out the criteria against which planning applications for Gypsy, Traveller and Travelling Showpeople sites will be assessed.

1.7 The Gypsy and Traveller Site Allocations DPD will be an integral document in the statutory Local Plan for Rugby Borough. It will provide more detailed policy advice on allocating sites/yards for Gypsies, Travellers and Travelling Showpeople. All policies in the Rugby Borough Gypsy and Traveller Site Allocations DPD and the other documents that comprise the Development Plan are interdependent and should be read alongside each other. As well as Policy DS2, Local Plan policies relating to sustainable development (Policy GP1), economic development (policies ED1 – ED4), and the natural and built environment (policies NE1-NE3) will be of particular relevance to the Gypsy and Traveller Site Allocations DPD.

Outline of the Issues and Options Rugby Borough Gypsy and Traveller Site Allocations DPD

1.8 The Issues and Options version of the Rugby Borough Gypsy and Traveller DPD (September 2022) has been prepared to inform statutory consultees, the

public and relevant organisations of the Council's intention to produce a DPD and to seek feedback on what it should contain.

1.9 There are ten issues identified within the Issues and Options version of this DPD, with various options identified in relation to each (see Chapter 4):

- Issue 1: Gypsy and Traveller Accommodation Need
- Issue 2: Travelling Showpeople Accommodation Need
- Issue 3: Transit Accommodation Need
- Issue 4: The Location of Permanent Residential Pitches
- Issue 5: Transit Pitches
- Issue 6: Size of Sites
- Issue 7: Design Standards
- Issue 8: Site Assessment Criteria
- Issue 9: Sustainability Appraisal of the Issues and Options
- Issue 10: Any other Issues

1.10 In addition, a Call for Sites is being run alongside consultation on the Issues and Options version of the Rugby Borough Gypsy and Traveller DPD, seeking to identify sites to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople. Any reasonable alternative site options that are identified through that process will be subject to SA.

Sustainability Appraisal and Strategic Environmental Assessment

1.11 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the Strategic

Environmental Assessment (SEA) Regulations (as amended) [\[See reference 7\]](#). The SEA Regulations remain in force post-Brexit and it is a legal requirement for the DPD to be subject to SA and SEA throughout its preparation.

1.12 On 11th May 2022 the Government published the Levelling up and Regeneration Bill, which sets out in detail the Government's proposals for reforming the planning system. Amongst other things, the Bill proposes the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however at present the requirement for SEA remains as set out in existing legislation. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the DPD is prepared.

1.13 SA and SEA are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. In simple terms, SEA considers only the environmental effects of a plan, while SA considers the plan's wider economic and social effects in addition to its potential environmental impacts. SA should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, so a separate SEA should not be required. An approach which satisfies the requirements for both SA and SEA is advocated in the Government's Planning Practice Guidance (PPG) [\[See reference 8\]](#). Practitioners can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken for the Rugby Borough Gypsy and Traveller Site Allocations DPD. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

1.14 The SA process comprises a number of stages, as shown below.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal Report.

Stage D: Consulting on the plan and the SA Report.

Stage E: Monitoring the significant effects of implementing the plan.

Meeting the Requirements of the SEA Regulations

1.15 The section below signposts the relevant parts of this SA Report that are considered to meet the SEA Regulations requirements. This information will be included in the SA Report at each stage of plan preparation to show how the requirements of the SEA Regulations have been met through the SA process.

1.16 SEA guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline, or reports not yet published, these are highlighted in this report. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the SA process as and when data are published.

Environmental Report

- Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible Authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs

(2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:

(e) Implementing the plan or programme; and

(f) Reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2).

- **Covered in this Report?** This SA Report which has been produced to accompany consultation on the Issues and Option Rugby Borough Gypsy and Traveller Site Allocations DPD constitutes the 'environmental report'.
- An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
- The environmental characteristics of areas likely to be significantly affected.
- Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.
- The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.
- **Covered in this report?** Chapter 1, Chapter 3, Appendix B and Appendix C.
- The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:
 - biodiversity;

- population;
- human health;
- fauna;
- flora;
- soil;
- water;
- air;
- climatic factors;
- material assets;
- cultural heritage, including architectural and archaeological heritage;
- landscape; and
- the interrelationship between the issues referred to in sub-paragraphs (a) to (l).
- **Covered in this report?** Chapter 4.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.
 - **Covered in this report?** Chapter 4.
- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.
 - **Covered in this report?** Chapter 2 and Chapter 4.
- A description of the measures envisaged concerning monitoring in accordance with regulation 17.
 - **Covered in this report?** Chapter 5.

- The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:
 - Current knowledge and methods of assessment;
 - The contents and level of detail in the plan or programme;
 - The stage of the plan or programme in the decision-making process; and
 - The extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.
- (Regulation 12 (3))
 - **Covered in this report?** The Environmental Report at each stage of the SA will adhere to this requirement.

Consultation

- When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible Authority shall consult the consultation bodies. (Regulation 12(5))
 - **Covered in this report?** The SA Scoping Report was produced by LUC and consulted on from May to June 2022. The responses received are summarised in Appendix A.
- Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).
 - **Covered in this report?** Consultation on the Issues and Options Rugby Borough Gypsy and Traveller Site Allocations DPD is taking place during Summer 2022. The consultation document is accompanied by this SA Report.

- Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).
- **Covered in this report?** The DPD is not expected to have significant effects on other EU Member States.

Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)

- Provision of information on the decision:
 - When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:
 - The plan or programme as adopted;
 - A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
 - The measures decided concerning monitoring.
- **Covered in this report?** To be addressed after the DPD is adopted.

Monitoring

- The responsible Authority shall monitor the significant 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(1))

- **Covered in this report?** Chapter 5 suggests a framework for monitoring the likely significant effects of the DPD.

Structure of the SA Report

1.17 This chapter has described the background to the production of the Rugby Borough Gypsy and Traveller Site Allocations DPD and the requirement to undertake SA. The remainder of this SA Report is structured into the following sections:

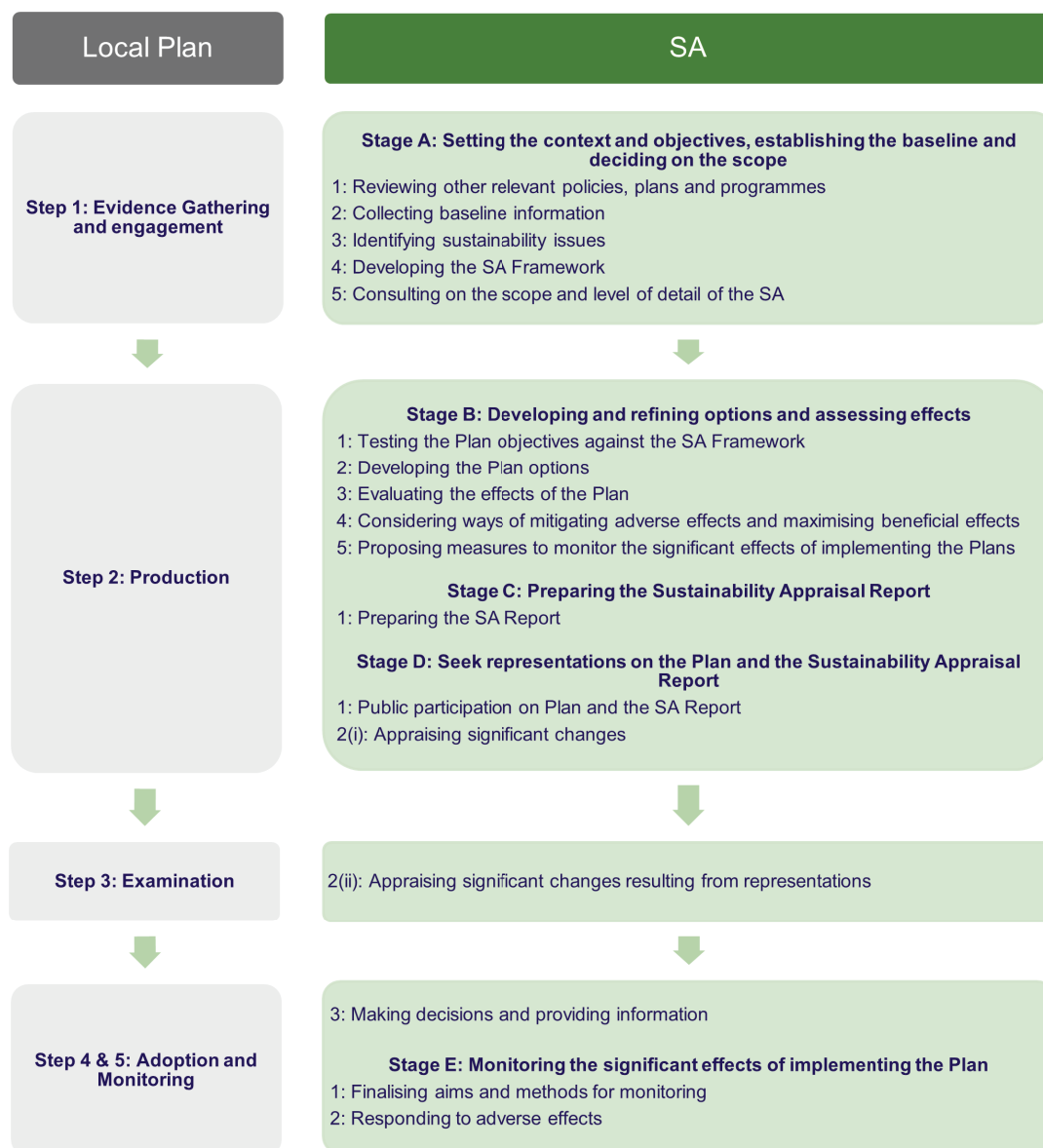
- Chapter 2 describes the approach that is being taken to the SA of the Rugby Borough Gypsy and Traveller Site Allocations DPD.
- Chapter 3 describes the relationship between the DPD and other relevant plans, policies and programmes; summarises the social, economic and environmental characteristics of Rugby Borough and identifies the key sustainability issues facing the Borough.
- Chapter 4 presents the SA findings for the options that have been considered for the DPD to date.
- Chapter 5 describes suggested indicators for monitoring the potential sustainability effects of the DPD.
- Chapter 6 presents the conclusions of the SA of the Issues and Options version of the DPD and describes the next steps to be undertaken.
- Appendix A presents a summary of the consultation comments received in relation to the SA Scoping Report and explains how they have been addressed.
- Appendix B presents a review of international, national and local plans, policies and programmes of relevance to the DPD and the SA.
- Appendix C presents baseline information for Rugby Borough.
- Appendix D sets out the assumptions that will be used to inform the consistent appraisal of Gypsy and Traveller site options.

Chapter 2

Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the SA of the Rugby Borough Gypsy and Traveller Site Allocations DPD is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance (PPG). This calls for SA to be carried out as an integral part of the plan-making process. Figure 2.1 overleaf sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Figure 2.1: Corresponding stages in plan-making and SA



2.2 The sections below describe the approach that has been taken to the SA of the DPD to date and provide information on the subsequent stages of the process.

SA Stage A: Scoping

2.3 The Scoping stage of SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues, and using these to inform the appraisal framework as follows.

Review other relevant policies, plans and programmes to establish policy context

2.4 A DPD is not prepared in isolation; rather it is prepared within the context of other policies, plans and programmes. The SEA Regulations require the Environmental Report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support the attainment of sustainability objectives that have been established at the international, national, and regional/sub-regional levels.

2.5 A review was therefore undertaken of other policies, plans, and programmes at the international, national, regional and sub-regional levels that were considered to be relevant to the scope of the Rugby Borough Gypsy and Traveller Site Allocations DPD. This review was presented in the SA Scoping Report [\[See reference 2\]](#). The review of plans, policies and programmes has been updated during the preparation of this report to reflect the most recent policy context and Scoping consultation comments received, particularly in relation to the historic environment. The updated review is summarised in Chapter 3 and presented in full in Appendix B.

Collect baseline information to establish sustainability context

2.6 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the DPD's effects can be assessed in the SA and monitored during the plan's implementation.

2.7 Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the DPD to understand the likely future sustainability conditions in the absence of the DPD.

2.8 The SEA Regulations require the Environmental Report to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the DPD itself, allows the SA to report on the likely cumulative effects of the DPD, which is another requirement of the SEA Regulations.

2.9 The SEA Regulations require an assessment of effects in relation to the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to the SEA topics as well as additional sustainability topics covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the SA and SEA processes. As part of the preparation of this SA Report, the baseline information for Rugby Borough which was originally presented in the SA Scoping Report has been updated to reflect the most recent sources of data and to address the Scoping consultation comments received, in particular additional information has been collated in relation to the historic environment. The baseline information for the Borough is presented in Appendix C.

Identify key sustainability issues

2.10 The baseline information also allows the identification of existing sustainability issues, including problems as required by the SEA Regulations.

2.11 Key sustainability issues facing Rugby Borough and an analysis of their likely evolution without the DPD are detailed in Chapter 3. Key sustainability issues for Rugby Borough were originally identified in the SA Scoping Report (May 2022).

Develop the SA framework

2.12 The relevant sustainability objectives identified by the review of other policies, plans, and programmes, together with the key sustainability issues facing the Borough identified by the collection and review of baseline information, helped to inform the development of a set of sustainability objectives (the 'SA framework') against which the effects of the DPD would be assessed.

2.13 Development of the SA framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The SA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan.

2.14 The SA framework for the Rugby Borough Gypsy and Traveller Site Allocations DPD was informed initially by a review of the SA framework that was previously used in the SA of the adopted Local Plan. That SA framework was updated in light of the review of relevant policies, plans and programmes as well as the baseline information for the plan area. The SA objectives have also been refined taking into account the types of issues that are capable of being affected

by a Gypsy and Traveller Site Allocations DPD. No changes have been made to the SA objectives as a result of the Scoping consultation.

2.15 The SA framework for the Rugby Borough Gypsy and Traveller Site Allocations DPD is presented in Figure 2.2 at the end of this chapter.

Consult on the scope and level of detail of the SA

2.16 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA Report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.

2.17 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England, and Natural England) to be consulted “when deciding on the scope and level of detail of the information that must be included” in the SA Report. This consultation on the SA Scoping Report was undertaken between May and June 2022.

2.18 Appendix A lists the comments that were received on the scope of the SA during this period of consultation and describes how each one has been addressed in the SA report for the Rugby Borough Gypsy and Traveller Site Allocations DPD. In light of the comments received, a number of amendments were made to the review of policies, plans, and programmes; historic environment baseline information; and the SA objective 13 site assessment criteria.

SA Stage B: Developing and refining options and assessing effects

2.19 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

2.20 In relation to the SA report, Part 3 of the SEA Regulations 12 (2) requires that:

The report must identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”

2.21 Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of:

“(h) an outline of the reasons for selecting the alternatives dealt with”

2.22 The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not

meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework (NPPF)).

2.23 The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

2.24 The options associated with the 10 issues in the Issues and Options version of the DPD are appraised in Chapter 4 of this report, where they are of a format appropriate for appraisal. As noted in Chapter 1, the timescales for preparing the DPD and the SA Report were such that the authors of this report did not have sight of the final consultation document, the figures within which were to be informed by the emerging update to the Gypsy and Traveller Accommodation Assessment (GTAA). However, the fundamental principles of each option have been able to be appraised against the SA objectives.

SA Stage C: Preparing the Sustainability Appraisal Report

2.25 This SA Report describes the process that has been undertaken to date in carrying out the SA of the Rugby Borough Gypsy and Traveller Site Allocations DPD and sets out the SA findings for the reasonable alternative options considered to date for the DPD. Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects where possible at this early stage of the SA (cumulative effects, for example, are more able to be assessed once decisions have been made about which combinations of options to take forward in the next iteration of the DPD).

2.26 The SA findings for the options are set out in Chapter 4 of this SA Report.

SA Stage D: Consultation on the DPD and the SA Report

2.27 Information about consultation on the SA that has already taken place at earlier stages of plan-making has been provided above. Rugby Borough Council is now inviting comments on the Issues and Options version of the Rugby Borough Gypsy and Traveller Site Allocations DPD. This SA Report is being published on the Council's website alongside the DPD, so that the two documents can be read in parallel. Consultation comments received on this SA Report will be taken into account at the next stage of the SA.

SA Stage E: Monitoring implementation of the DPD

2.28 Draft recommendations for monitoring the likely significant social, environmental and economic effects of implementing the DPD are included in Chapter 5 of this SA Report and these will be updated as appropriate during later stages of the SA.

Appraisal methodology

2.29 Reasonable alternative options for the DPD have been appraised against the SA objectives in the SA framework with symbols being attributed to each option to indicate its likely effects on each SA objective as shown in Table 2.1. Where a potential positive or negative effect is uncertain, a question mark was added to the relevant symbol (e.g. +? or -?) and the symbol was colour coded in line with the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

2.30 The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown in Table 2.1. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

Figure 2.2: SA Framework symbol and colour coding

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
++/--	Mixed significant positive and significant negative effects likely
+/-	Mixed minor positive and minor negative effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Uncertain effect

The use of site assessment criteria and uncertainty

2.31 A Call for Sites exercise is being conducted by the Council alongside the Issues and Options consultation, in order to identify reasonable alternative options for site allocations to be included in the DPD. Once any reasonable options are identified, they will be subject to SA at the next stage of the process.

2.32 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, a detailed set of site assessment criteria has been developed and will be applied. These site assessment criteria are included within Appendix D. The criteria relate specifically to the type of site options being considered (sites for Gypsies, Travellers and Travelling Showpeople) and set out clear parameters within which certain SA effects would be identified, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The assumptions will be applied through the use of Geographical Information Systems (GIS) data.

Difficulties and Data Limitations

2.33 The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

“...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

2.34 A number of difficulties and limitations arose in the course of the SA as follows:

- Some of the data which are available at the national and district levels are based on the reporting of the 2011 Census. This data allows for comparisons to be made between Rugby Borough and national performance in relation to number of indicators; however it recognised that data is now relatively old considering the timings of the national census. If data from the 2022 Census becomes available later in the SA process it will be used to inform the SA as appropriate.
- The available Landscape Sensitivity Study and Heritage Asset Review were outdated as an evidence base to assess site allocations in relation to landscape and historic environment. In the absence of more recent data these sources are being used, although their limitations are recognised.
- This SA Report has been prepared on the basis of a draft incomplete version of the Issues and Options consultation document, some aspects of which were still to be finalised at the time of writing. In particular, updated figures from the 2022 GTAA were still to be included. This report appraises the principles of each of the options being considered which are not expected to change as the consultation document is finalised.

Chapter 3

Sustainability Context

3.1 Schedule 2 of the SEA Regulations requires information on the following (numbering relates to the specific numbered list in Schedule 2):

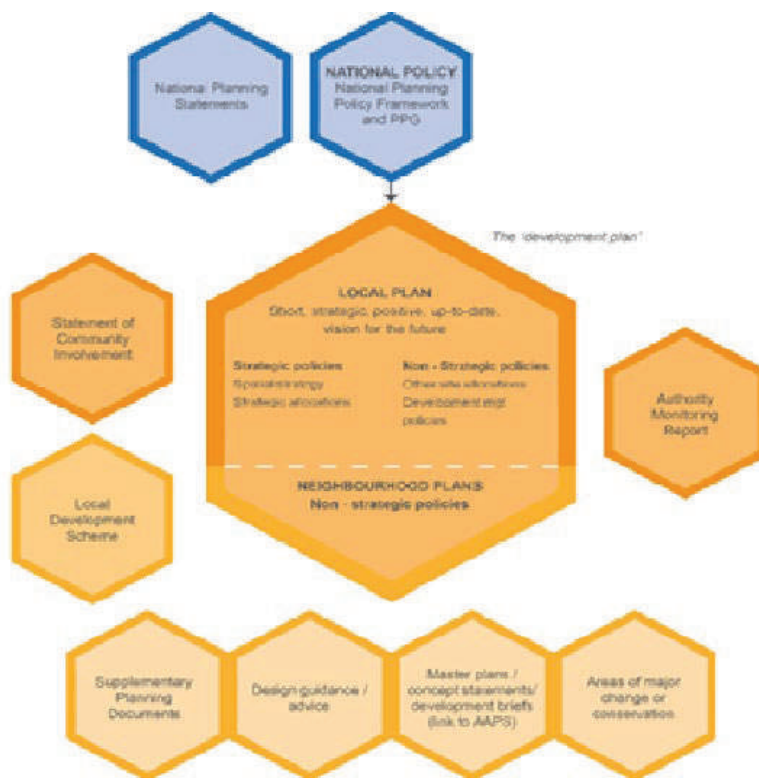
1. “an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes” and
5. “the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”.

3.2 An outline of the Rugby Borough Issues and Options Gypsy and Traveller Site Allocations DPD was provided in Chapter 1. The other reporting requirements are met in this chapter.

Relationship with other Relevant Plans or Programmes

3.3 The Rugby Borough Gypsy and Traveller DPD is not prepared in isolation and must be in conformity with a range of international and national plans and programmes as shown below in Figure 3.1. The Rugby Borough Gypsy and Traveller Site Allocations DPD will form part of the Development Plan for Rugby Borough.

Figure 3.1: Relationship between the Rugby Borough Gypsy and Traveller DPD and other relevant plans or programmes



Policy Context

1.1 The policy context in which the Rugby Borough Gypsy and Traveller DPD is being prepared informs consideration of what constitute reasonable alternative policy options for that document as well as the framework of sustainability objectives against which it will be appraised. It should be noted that the policy context is inherently uncertain as the current framework outlined here is likely to change in response to a number of key factors:

- Brexit - Following the United Kingdom's (UK) departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. Directly applicable EU law now no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law.
- On 11th May 2022 the Government published the Levelling up and Regeneration Bill, which sets out in detail the Government's proposals for reforming the planning system. Amongst other things, the Bill proposes the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however at present the requirement for SEA remains as set out in existing legislation. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the Local Plan is prepared.
- COVID-19 – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development, changes to permitted development rights, increased remote working and reduced commuting and related congestion and air pollution, increased prioritisation of walking and cycling over public transport; and increasing pressure to ensure satisfactory living standards are set and enforced.

3.4 It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of local authorities, including Rugby Borough Council, that have declared a climate emergency.

International

3.5 Former EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') were transposed into the Strategic Environmental Assessment (SEA) Regulations [See reference 3] and Habitats Regulations [See reference 4]. Following the UK's departure from the EU, these Regulations still apply and require environmental assessment processes to be undertaken in relation to the Rugby Borough Gypsy and Traveller DPD. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

3.6 There were also a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which are transposed into UK law through Acts, Regulations and national-level policy. The UK has now fully left the EU and therefore EU Directives no longer apply to the UK. The relevant Regulations are summarised in Appendix B.

National

3.7 There is an extensive range of national policies, plans and programmes that are of relevance to the Rugby Borough Gypsy and Traveller DPD and the SA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies, plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) of relevance to the Rugby Borough Gypsy and Traveller DPD and the SA is provided below. In addition, the main sustainability objectives of other national plans and programmes which are of most relevance to the DPD and the SA are summarised in Appendix B.

The National Planning Policy Framework and Planning Practice Guidance

3.8 The NPPF [\[See reference 5\]](#) is the overarching planning framework which provides national planning policy and principles for the planning system in England. The NPPF was originally published in March 2012, revised in July 2018, updated in February 2019 and again in July 2021. The most recent update to the NPPF places an increased focus on design quality. This includes for sites as well as for places as a whole. The terminology included in the Framework on protecting and enhancing the environment and promoting a sustainable pattern of development has been revised. Furthermore, revisions are included in relation to policies which address opting out of permitted development, the use of masterplans and design codes and the important contribution of trees in new developments.

3.9 The DPD must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

3.10 The PPG [\[See reference 6\]](#) provides guidance for how the Government’s planning policies for England are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

3.11 Specific planning policy for Gypsy and Traveller sites is contained in the Planning Policy for Traveller Sites [\[See reference 7\]](#). It sets out the Government’s aims in respect of Travellers’ sites:

- “that local planning authorities should make their own assessment of need for the purposes of planning;
- to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
- to encourage local planning authorities to plan for sites over a reasonable timescale;
- that plan-making and decision-taking should protect Green Belt from inappropriate development;
- to promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites;
- that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
- for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
- to increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
- to reduce tensions between settled and Traveller communities in plan making and planning decisions;
- to enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure; and,
- for local planning authorities to have due regard to the protection of local amenity and local environment”.

3.12 In relation to planning for Traveller sites, national policy states that local planning authorities should, in producing their Local Plans:

- “identify and update annually, a supply of specific deliverable sites sufficient to provide five years’ worth of sites against their locally set targets;
- identify a supply of specific, developable sites or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
- relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density; and,
- protect local amenity and environment”.

3.13 The Government guidance also states that local planning authorities should ensure that Traveller sites are sustainable economically, socially and environmentally. They should, therefore, ensure that their policies:

- “promote peaceful and integrated co-existence between the site and the local community;
- promote, in collaboration with commissioners of health services, access to appropriate health services;
- ensure that children can attend school on a regular basis;
- provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
- provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any Travellers that may locate there or on others as a result of new development;

- avoid placing undue pressure on local infrastructure and services;
- do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and,
- reflect the extent to which traditional lifestyles (whereby some Travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability”.

Other National Policies, Plans and Programmes

3.14 Numerous other policies, plans and programmes at a national level are of relevance to preparation of the DPD and the SA. Unlike the NPPF, most of the documents are focussed on a specific topic area which the SA will consider. There will be some overlap between SA topics covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance for the SA have been grouped by the topics they most directly seek to address, and green boxes below each topic heading summarise the implications of the national PPPs (including the NPPF) for the DPD and the SA.

Climate change adaptation and mitigation, energy efficiency and waste minimisation

3.15 The relevant national PPPs under this topic are:

- Glasgow Climate Pact 2021
- UK Climate Change Strategy 2021-2024
- British Energy Security Strategy (2022)
- Net Zero Strategy: Build Back Greener (2021).

- Department for Transport, Decarbonising Transport: Setting the Challenge (2020).
- The Industrial Decarbonisation Strategy (2021)
- 25 Year Environment Plan (2018)
- Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018).
- The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018)
- UK Climate Change Risk Assessment (2017)
- HM Government, The Clean Growth Strategy (2017).
- National Planning Policy for Waste (NPPW) (2014).
- Defra, Waste Management Plan for England (2013).
- The Energy Efficiency Strategy (2012)
- Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England (2011)
- Defra and the Environment Agency, Understanding the risks, empowering communities, building resilience: The National Flood and Coastal Erosion Risk Management Strategy for England (2011).
- The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009)
- The UK Renewable Energy Strategy (2009)
- The Heat and Buildings Strategy (2021)
- The UK Hydrogen Strategy (2021)
- British Energy Security Strategy 2022
- The Energy Performance of Buildings Regulations (2021)
- The Energy white paper: Powering our net zero future (2020)

- Flood and Water Management Act 2010
- The Flood and Water Regulations 2019
- Historic England's Climate Change Strategy (2022)

Implications for the DPD and SA: The DPD should consider setting out policies to achieve climate change and adaptation while also encouraging development which would help to minimise carbon emissions. This can be done through siting development allocations in areas where sustainable transport patterns can be best achieved and encouraging development to make use of more sustainable sources of energy. The DPD should also contain policies to encourage appropriate use of SuDS and handling of waste in line with the waste hierarchy.

The SA can test policy options in relation to the contributions they make towards these aims. It should also appraise the contribution individual site options can make to limiting carbon emissions (including through the uptake of more sustainable sources of energy). Sites should also be considered in terms of the impact they will have in promoting climate change adaptation as well as reducing flood risk and the amount of waste that goes to landfill.

Health and well-being

3.16 The relevant national PPPs under this topic are:

- National Design Guide (2021)
- National Model Design Code (2021)
- Build Back Better: Our Plan for Health and Social Care (2021)
- COVID-19 mental health and wellbeing recovery action plan (2021)

- The Charter for Social Housing Residents: Social Housing White Paper (2020)
- Using the planning system to promote healthy weight environments (2020), Addendum (2021)
- Planning for the Future White Paper (2020)
- Homes England Strategic Plan 2018 to 2023 (2018)
- Planning Policy for Traveller Sites (2015)
- The health of Gypsies and Travellers in the UK (2008)
- Fair Society, Healthy Lives (2011)
- Public Health England, PHE Strategy 2020-25
- Healthy Lives, Healthy People: Our strategy for public health in England
- HM Government, Laying the foundations: housing strategy for England (2011)
- Homes England Strategic Plan 2018 to 2023

Implications for the DPD and SA: The DPD needs to consider the need for infrastructure as this has a significant impact on the environment and it should be prepared to ensure that the population has access to sustainable low carbon infrastructure and services and facilities and that there is sufficient capacity within them to serve the Gypsy and Traveller community. This should include healthcare, education and open space. Site allocations should be located in areas where facilities are most accessible, issues of overcapacity would be less likely to result, and active modes of travel might be promoted. The provision of an appropriate level of Gypsy and Traveller accommodation over the plan period will help address issues of disparity in terms of access to decent accommodation in the plan area. The provision of new Gypsy and Traveller accommodation should be considerate of local needs with regards to sites and pitches.

Policy options considered for the DPD can be tested through the SA in relation to the contributions they make towards these aims. The SA should also appraise the contribution individual site options can make to health and wellbeing. This should be considered through the access that the site provides to facilities which might benefit public health. It may be necessary to consider the capacity of existing facilities when considering individual site options.

Environment (biodiversity/geodiversity, landscape and soils)

3.17 The relevant national PPPs under this topic are:

- The Environment Act 2021
- Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- Defra, Biodiversity offsetting in England Green Paper (2013).
- Biodiversity 2020: A Strategy for England's wildlife and ecosystem services (2011)
- Defra, Safeguarding our Soils – A Strategy for England (2009)
- England Biodiversity Strategy Climate Change Adaptation Principles (2008)

Implications for the DPD and SA: The DPD should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes and higher value soils. The plan area contains a number of internationally and nationally important biodiversity sites which will need to be protected through planning policy. The plan should also take into account non-designated landscapes identified to be particularly sensitive to development and non-designated habitats which form part of the wider ecological network. The plan also presents opportunities to

promote the achievement of net gain in biodiversity. It can also be used to encourage the re-use of brownfield land and protect more valuable agricultural soils from development. Benefits may be achieved by directing development to less sensitive locations. The allocation of new Gypsy and Traveller sites and updated planning policy can also be used to achieve habitat connectivity through the provision of new green infrastructure.

It will be the role of the SA to test the policy options in terms of the effect they will have on biodiversity sites and habitats as well as high value landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural soils should also be appraised. Site options should be considered in these terms also.

Historic environment

3.18 The relevant national PPPs under this topic are:

- The Heritage Alliance, Heritage 2020.
- Historic England, Corporate Plan 2018-2021.
- Historic England, Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016).
- Historic England Advice Note 1: Conservation Area Appraisal Designation and Management (second edition) 2019
- Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets 2019
- Historic England Good Practice Advice Note 3: The Setting of Heritage Assets (second edition) 2017
- Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans 2015

- Historic England Good Practice Advice in Planning 1: The Historic Environment in Local Plans 2015
- Historic England; Conservation Principles, Policies and Guidance 2008

Implications for the DPD and SA: The potential impact of new Gypsy and Traveller sites on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings, should also inform the preparation of the DPD. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk'. Policies should be included to address these issues and site options should be considered with regard to the potential for related issues.

The SA should appraise both policy and site options in terms of the potential for effects on the historic environment. It should identify those locations at which new Gypsy and Traveller sites would have the greatest potential to adversely impact the historic environment.

Water and air

3.19 The relevant national PPPs under this topic are:

- The Waste (Circular Economy) (Amendment) Regulations (2020)
- The Water Supply (Water Quality) Regulations
- Defra, Clean Air Strategy (2019).
- The Road to Zero (2018)
- Our Waste, Our Resources: A strategy for England (2018)
- The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)
- Environment Agency, Managing Water Abstraction (2016).

- Defra, Water White Paper (2012).
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
- Air Quality Standards Regulations

Implications for the DPD and SA: The DPD should consider setting out policies to promote the efficient use of water and limit all types of pollution including water and air pollution. It should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of new Gypsy and Traveller sites should take account of areas which have highest sensitivity in relation to these issues, including Source Protection Zones (SPZ) and Air Quality Management Areas (AQMA). To limit the potential for air quality issues to be intensified as development is delivered over the plan period the DPD should also factor in the contribution specific site options can make to achieving modal shift and limiting the need for residents to travel.

The contribution that policy options can make to achieving these aims can be tested through the SA.

Economic growth

3.20 The relevant national PPPs under this topic are:

- Build Back Better: Our Plan for Growth (2021).
- UK Industrial Strategy: Building a Britain fit for the future (2018).
- HM Government, Industrial Strategy: building a Britain fit for the future (2017).
- LEP Network, LEP Network response to the Industrial Strategy Green Paper Consultation (2017).

- National Infrastructure Delivery Plan 2016-2021 (2016).
- Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016-2021.
- The White Paper Levelling Up the United Kingdom (2022)
- Agricultural Transition Plan 2021 to 2024

Implications for the DPD and SA: The DPD should allocate new Gypsy and Traveller sites in locations where people will be more easily able to access employment opportunities. DPD policies may also seek to promote the viability of Town Centres.

The SA can test individual site and policy options in relation to the contribution they can make to achieving these aims.

Transport

3.21 The relevant national PPPs under this topic are:

- Decarbonising Transport: A Better, Greener Britain (2021)
- Transport Investment Strategy (2017).
- Highways England Sustainable Development Strategy and Action Plan (2017).
- The Environmental Noise Regulations.

Implications for the DPD and SA: The potential for reducing the need to travel, limiting congestion and associated benefits for air quality and climate change as well as public health should inform the preparation of the policies for the DPD and its site allocations. The DPD can also be supportive of more sustainable modes of transport. This may include support for the

infrastructure necessary for electric vehicles. Furthermore, the selection of site options for Gypsy and Traveller accommodation should be informed by issues such as the potential for access to new and existing public transport nodes and active transport routes, and specific highways capacity issues. The selection of individual site options should also be informed by their proximity to essential services and facilities which is likely to reduce the need for residents to regularly travel long distances.

The SA should be used to test policy and site options in terms of the contribution they can make to making transport choices more sustainable in the Borough. As well as testing site options in terms of limiting the need to travel in Rugby Borough, policy options should be tested with regard the contribution they make to the uptake of more sustainable transport options, such as walking and cycling and public transport.

Key Local Plans, Policies and Programmes

Rugby Borough Local Plan 2011-2031

3.22 The Rugby Borough Local Plan 2011-2031 was adopted on 4th June 2019. The Local Plan sets out the overall vision, objectives and policies to guide future development in Rugby Borough [See reference 8]. At the centre of the Local Plan is the principle of sustainable development.

3.23 The housing requirement included within the Local Plan will be provided in two distinct phases with different annual rates of delivery. Phase 1 of the plan period is between 2011-2017. The annual housing target in Phase 1 is 540 dwellings per annum. Phase 2 of the plan period is between 2017-2031. The annual housing target in phase 2 is 654 dwellings per annum. The total

anticipated provision within the plan period is 13,664. A new neighbourhood of up to 5,000 dwellings and 35ha of B8 employment land is allocated at land to the South West of Rugby. The South West Allocation will be an important extension to Rugby Town.

3.24 Rugby town is the most sustainable location for growth in the Borough and the Local Plan seeks to maximise the potential of the urban area and land immediately adjacent to accommodate growth. 58.5 ha of employment land will be provided as part of the strategic urban extensions allocated in the plan at Coton Park East, Rugby Radio Station and South West Rugby.

3.25 Through examination, amendments to Policy DS2 (Sites for Gypsy, Travellers and Travelling Showpeople) were proposed to ensure the Plan is positively prepared in seeking to meet the needs of the travelling community.

3.26 There are currently five 'made' Neighbourhood Plans within Rugby Borough (Coton Forward; Willoughby; Ryton-on-Dunsmore; Wolvey and Brandon and Bretford). A public consultation was held between 8th February to 22nd March 2022 in relation to the Draft Brinklow Neighbourhood Plan. Four areas have been recently designated as Neighbourhood Areas (Clifton-upon-Dunsmore, Monks Kirby, Grandborough, Dunchurch) with the intention to prepare a Neighbourhood Plan. None of the Neighbourhood Plans (adopted or draft) refer to Gypsies and Travellers.

GTAAs and Gypsies, Travellers and Travelling Showpeople Local Plan policies in adjoining local authorities

3.27 Development in Rugby Borough will not be delivered in isolation from those areas around it. The following GTAAs for local authority areas which surround Rugby Borough have been prepared:

- Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment: Warwick (2012)

- Stratford-on-Avon District Gypsy and Traveller Accommodation Assessment Update Study (2019)
- West Northamptonshire Traveller's Accommodation Needs Study (2017)
- Leicester City and Leicestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017)
- Hinckley and Bosworth Gypsy and Traveller Accommodation Assessment (2016)
- Nuneaton and Bedworth Borough Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2021 Update
- Coventry Gypsy and Traveller Accommodation Assessment (2015)
- Lichfield District Council, North Warwickshire Borough Council and Tamworth Borough Council Gypsy and Traveller Accommodation Assessment (2019)

3.28 A summary of the following Gypsy and Traveller plans for local authority areas which surround Rugby Borough is also provided in Appendix B:

- Warwick District Council Local Plan Sites for Gypsies and Travellers (2013)
- Stratford-on-Avon Gypsy and Traveller and Travelling Showpeople Supplementary Planning Document (2021)
- Harborough Gypsy, Traveller and Travelling Showpeople Site Identification Study Report (2017)
- Nuneaton and Bedworth Borough Gypsy and Traveller Site Allocations DPD 2022)
- North Warwickshire Update on Gypsies and Travellers needs and 5 year site/pitch supply

Chapter 4

Sustainability Appraisal Findings for the DPD Options

4.1 This chapter presents the SA findings for the options that have been considered to date. The Issues and Options version of the DPD (September 2022) sets out 10 issues with a total of 32 associated options for the Gypsy and Travellers Site Allocations DPD.

4.2 A number of the options identified under each issue were not suitable to be appraised through the SA, for example because they comprise of open-ended questions.

Issue 1 – Gypsy and Traveller Accommodation Need

- Option 1: Should the Council be planning for the level of permanent residential pitches identified in the latest 2022 GTAA?
 - **Was the option appraised?** Yes
- Option 2: Should the Council be planning for a higher level of permanent residential pitches, if so, what evidence do you have to justify this need?
 - **Was the option appraised?** Yes
- Option 3: Should the Council be planning for a lower level of permanent residential pitches, if so, what evidence do you have to justify this need?
 - **Was the option appraised?** Yes
- Option 4: There is another approach to identify the Gypsy and Traveller accommodation need that the Council should consider. Please provide details of this approach in your response.
 - **Was the option appraised?** No, open ended question not suitable for appraisal.

Issue 2 – Travelling Showpeople Accommodation Need

- Option 1: Should the Council be planning for the level of plots for Travelling Showpeople identified in the latest 2022 GTAA?
 - **Was the option appraised?** Yes
- Option 2: Should the Council be planning for a higher level of plots for Travelling Showpeople, if so, what evidence do you have to justify this need?
 - **Was the option appraised?** Yes
- Option 3: Should the Council be planning for a lower level plots for Travelling Showpeople, if so, what evidence do you have to justify this need?
 - **Was the option appraised?** Yes
- Option 4: There is another approach to identify the Travelling Showpeople need that the Council should consider. Please provide details of this approach in your response.
 - **Was the option appraised?** No, open ended question not suitable for appraisal.

Issue 3 – Transit Accommodation Need

- Option 1: a) Should the Council be planning for ? transit/ emergency stopping sites in Rugby Borough as identified in the 2022 GTAA?
 - **Was the option appraised?** Yes in principle, although the specific number of sites could not be considered as the DPD had not been finalised at the time of appraisal.
- Option 1: b) What size should the temporary or transit/ emergency stopping sites be?
 - **Was the option appraised?** Yes (a high-level narrative appraisal of the likely effects of smaller/larger sites)

- Option 2: There is another approach to the provision of transit/ emergency stopping sites that the Council should consider. Please provide details of this approach in your response.
- **Was the option appraised?** No, open ended question not suitable for appraisal.

Issue 4 – The Location of Permanent Residential Pitches

- Option 1: Increase capacity on existing authorised sites, where possible.
 - **Was the option appraised?** Yes
- Option 2: Expansion of the site area of existing authorised sites, where possible.
 - **Was the option appraised?** Yes
- Option 3: Increase capacity/ expand existing authorised sites outside of Wolvey and Shilton ward, and Dunsmore ward?
 - **Was the option appraised?** Yes
- Option 4: Allocation of new sites around the outskirts of Rugby town and the Main Rural Settlements as identified in Policy GP2 of the Rugby Borough Local Plan with good access to services and facilities.
 - **Was the option appraised?** Yes
- Option 5: Allocation of new sites in more rural areas (Rural Villages and Countryside), but still with reasonable access to essential services. [Contrary to Policy GP2]
 - **Was the option appraised?** Yes

Issue 5 – Location of Transit Pitches

- Option 1: One or two single sites close to Rugby.
 - **Was the option appraised?** Yes

- Option 2: Along highway corridors. This would need to be informed through local evidence of traditional Traveller movement patterns across Rugby Borough along with detailed highways discussions.
 - **Was the option appraised?** Yes
- Option 3: Combined residential/ transit pitches where provision for one or two pitches are provided for in conjunction with new permanent residential pitch provision.
 - **Was the option appraised?** Yes

Issue 6 – Size of sites

- Option 1: Provide fewer larger permanent sites to accommodate, for example, no more than 10 pitches each.
 - **Was the option appraised?** Yes
- Option 2: Provide a greater number of smaller sites to accommodate, for example, no more than 2 pitches each.
 - **Was the option appraised?** Yes
- Option 3: There is another approach to the size of sites. Please provide details of this approach in your response.
 - **Was the option appraised?** No, open ended question not suitable for appraisal.

Issue 7 – Design Standards

- Option 1 A: Design standards should be set for all Gypsies, Travellers and Travelling Showpeople sites. The design standards set out in Table 1 are appropriate.
 - **Was the option appraised?** Yes (a high-level narrative appraisal of the likely effects of more/less stringent design standards)
- Option 1 B: Design standards should be set for all Gypsies, Travellers and Travelling Showpeople sites. However, the design standards set out in

Table 1 are not appropriate. Please explain what you consider to be appropriate design standards.

- **Was the option appraised?** (a high-level narrative appraisal of the likely effects of more/less stringent design standards)
- Option 2: Given the diversity of sites and locations it is not possible to set design standards. Please explain your response.
- **Was the option appraised?** No, option is of a format not suitable for appraisal.

Issue 8 – Site assessment criteria

- Option 1: Do you agree with the existing suitability criteria listed in Policy DS2 of the adopted Rugby Borough Local Plan 2011-2031?
 - **Was the option appraised?** No, not of a format suitable for appraisal.
- Option 2: Should some, or all, of the existing suitability criteria listed in Policy DS2 be deleted or amended, and if so, which criteria? Please explain your response.
 - **Was the option appraised?** No, not of a format suitable for appraisal.
- Option 3: Should new criteria be added to the existing suitability criteria in Policy DS2? Please explain your response.
 - **Was the option appraised?** No, not of a format suitable for appraisal.
- Option 4: Do you agree with the availability and achievability criteria in Paragraph 6.2 above? Please explain your response.
 - **Was the option appraised?** No, not of a format suitable for appraisal.
- Option 5: Should the suitability criteria in Policy DS2 and the availability and achievability criteria in Paragraph 6.2 above be used for transit sites? If not, please explain in your response why not and if you think another approach should be used instead.
 - **Was the option appraised?** No, not of a format suitable for appraisal.

Issue 9 – Sustainability Appraisal of the Issues and Options

- Option 1: The Sustainability Appraisal of the Issues and Options is appropriate.
 - **Was the option appraised?** No, option not suitable for appraisal. The option is effectively a duplication of the separate consultation on the SA Report.
- Option 2: The Sustainability Appraisal of the Issues and Options is inappropriate. Please explain in your response why you consider the SA is inappropriate and provide details of how you think it should be amended.
 - **Was the option appraised?** No, option not suitable for appraisal. The option is effectively a duplication of the separate consultation on the SA Report.

Issue 10 – Any other issues

- No Options identified for appraisal.

SA findings for the Issues and Options DPD

4.3 The options that have been identified as appropriate for appraisal have been appraised against the SA objectives in the SA framework below. The options associated with each issue have been appraised together, with the likely effects set out in a table and summarised below.

Issues 1 and 2: Gypsy, Traveller and Travelling Showpeople Accommodation Need

4.4 The options associated with Issues 1 and 2 are identical apart from Issue 1 refers to the amount of Gypsy and Traveller accommodation to be provided and Issue 2 refers to the amount of Travelling Showpeople accommodation to be provided. Both groups of options consider the principle of whether provision should be made in line with the identified need, or at a higher or lower level. The appraisals of the two groups of options would therefore be effectively identical and in order to avoid duplication, the options have been appraised only once below in relation to both Gypsies and Travellers and Travelling Showpeople. Table 4.1 summarises the SA findings for the options considered in relation to Issues 1 and 2.

4.5 As recorded earlier in this chapter, the fourth option set out in the Issues and Options document was not of a format appropriate for appraisal.

Table 4.1: SA findings for Issues 1 and 2 options

SA objectives	Option 1: Plan for level of need identified in 2022 GTAAA	Option 2: Plan for a high level of need	Option 3: Plan for a lower level of need
SA Objective 1: Poverty and social exclusion	+	+	--
SA Objective 2: Services and facilities	0	0	-
SA Objective 3: Health	+	+	--
SA Objective 4: Accommodation	++	++	--
SA Objective 5: Crime	0	0	0

SA objectives	Option 1: Plan for level of need identified in 2022 GTAAA	Option 2: Plan for a high level of need	Option 3: Plan for a lower level of need
SA Objective 6: Economy	+	+	-
SA Objective 7: Town centre	?	?	-
SA Objective 8: Regeneration	0	0	0
SA Objective 9: Natural Resources and Renewable Energy	+/-	-?	+/-
SA Objective 10: Waste	+/-	+/-	+/-
SA Objective 11: Climate Change	+/-	+/-	-
SA Objective 12: Flood Risk	+/-	-	0
SA Objective 13: Cultural Heritage	+/-	-	0
SA Objective 14: Sustainable Transport	+	+	-
SA Objective 15: Pollution	+/-	+/-	-
SA Objective 16: Biodiversity	+/-	- ?	0
SA Objective 17: Landscape	+/-	- ?	0
SA Objective 18: Townscape	+/-	-	0

Summary of SA Findings for Issues 1 and 2 options

Option 1: Should the Council be planning for the level of permanent residential pitches and plots for Gypsies,

Travellers and Travelling Showpeople identified in the latest 2022 GTAA

4.6 Meeting the need identified within the 2022 GTAA for the level of permanent residential pitches and plots will provide suitable numbers of plots and pitches to meet the accommodation needs of Gypsy, Travellers and Travelling Showpeople. Therefore, minor positive effects are likely on **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health** as providing locations for suitable accommodation will support improvements in health and reductions in social exclusion. A significant positive effect is expected in relation to **SA Objective 4: Accommodation** as this option will plan for the level of pitches and plots required to meet the evidence-based need.

4.7 An adequate provision of pitches and plots could support access to employment opportunities by enabling people to live relatively close to their workplace and not being forced to live further afield due to a lack of accommodation. A minor positive effect is therefore expected in relation to **SA Objective 6: Economy**. The location of pitch and/or plot provision will have the most influence on accessibility to Rugby town and so an uncertain effect is identified in relation to **SA Objective 7: Town centre**.

4.8 The use of natural resources will likely be required in delivering the pitch and plot provision as set out with the 2022 GTAA. However, there is the potential to incorporate renewable energy initiatives and to encourage the sustainable use of materials. Therefore, a mixed minor positive and minor negative effect is expected in relation to **SA Objective 9: Natural Resources and Renewable Energy**. A mixed minor positive and minor negative effect is also expected in relation to **SA Objective 10: Waste** as any new pitch and plot provision will likely result in increased in waste. However, there may be opportunities to incorporate better recycling and re-use of waste onsite.

4.9 Mixed minor positive and minor negative effects are expected in relation to **SA Objective 11: Climate Change** and **SA Objective 15: Pollution** as any level of pitch and plot provision is likely to result in increased energy

consumption and may also involve increases in air, noise and light pollution. However, providing the required number of pitches and plots within Rugby Borough could reduce the need to travel longer distances and therefore reduce associated vehicle emissions. For the same reason, a minor positive effect is expected in relation to **SA Objective 14: Sustainable Transport**.

4.10 The likely effects of this option on the environmental SA objectives (**SA objectives 12: Flood Risk, 13: Cultural Heritage, 16: Biodiversity, 17: Landscape and 18: Townscape**) are uncertain as they will depend largely on the location of individual plots/pitches and their proximity to sensitive receptors and constraints. While the provision of new pitches/plots may mean that negative effects on these objectives occur as a result of new development, they may be sited in appropriate locations to avoid negative effects and the provision of pitches/plots at a level that meets the evidence based need may reduce the number of unauthorised sites being used, which may be in less suitable locations where negative environmental effects are more likely. Overall, mixed minor positive and minor negative but currently uncertain effects are identified against those objectives.

Option 2 – Should the Council be planning for a higher level of permanent residential pitches and plots for Gypsies, Travellers and Travelling Showpeople, if so, what evidence do you have to justify this need?

4.11 Providing a higher level of pitches and plots is expected to have a minor positive effect on **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health** and a significant positive effect in relation to **SA Objective 4: Accommodation** as an adequate level of pitch and plot provision will be still be provided but will be over the need as set out with the 2022 GTAA. Providing a higher number of pitches and plots will offer more choice for Gypsies, Travellers and Travelling Showpeople when choosing where to locate and will also offer flexibility in the future if the need for Gypsy, Traveller and Travelling Showpeople accommodation increases.

4.12 A higher level of provision of pitches and plots could support access to employment opportunities by increasing the likelihood of there being available sites that provide appropriate access. However, the location of pitch and/or plot provision will most likely influence accessibility to Rugby town centre. Therefore, a minor positive effect is expected in relation to **SA Objective 6: Economy** and an uncertain effect in relation to **SA Objective 7: Town centre**.

4.13 Mixed minor positive and minor negative effects are expected in relation to **SA Objective 11: Climate Change** and **SA Objective 15: Pollution** as any level of pitch and plot provision is likely to result in increased energy consumption and may result in increases in air, noise and light pollution. However, providing more than the required number of pitches and plots could reduce the need to travel longer distances, reducing associated vehicle emissions. For the same reason, a minor positive effect is expected in relation to **SA Objective 14: Sustainable Transport**.

4.14 Provision of pitches and plots over and above what is required could result in higher levels of waste that may not be as easily managed if pitches and plots all become occupied. However, there may also be good opportunities to incorporate better recycling and waste management systems. Therefore, a mixed minor positive and minor negative effect is expected in relation to **SA Objective 10: Waste**.

4.15 Planning for a higher level of pitches and plots than required could result in an oversupply of pitches and plots and additional land being lost to development. This would be more likely to have a negative effect on the natural environment and local landscape, although effects will depend to a large extent on the location of sites in relation to constraints and sensitive receptors, which is not yet known. Additionally, there could be increased disruption to the environment through the provision of utilities that are not well utilised unless the pitches and plots are occupied. Therefore, potential but uncertain minor negative effects are expected in relation to **SA Objectives 9: Natural resources and Renewable Energy, 12: Flood Risk, 13: Cultural Heritage, 16: Biodiversity, 17: Landscape and 18: Townscape**.

Option 3 – Should the Council be planning for a lower level of permanent residential pitches and plots for Gypsies, Travellers and Travelling Showpeople, if so, what evidence do you have to justify this need

4.16 A significant negative effect is expected in relation to **SA Objective 4: Accommodation** as this option will not plan for the level of pitches and plots which the evidence shows is required for Gypsy, Travellers and Travelling Showpeople. This could result in an under supply of pitches and plots resulting in a negative impact on health and an increase in poverty and social exclusion. Therefore, significant negative effects are expected in relation to **SA Objective 1: Poverty and Social exclusion** and **SA Objective 3: Health**.

4.17 Minor negative effects expected in relation to **SA Objective 2: Services and facilities**; **SA Objective 6: Economy** and **SA Objective 7: Town Centre** due to the lower level of pitch and plot provision providing less opportunities to access services; engage with the community; and access employment opportunities. Failing to meet the evidence-based need for plots and pitches could mean that people are less able to make use of accommodation near to their workplaces. However, the location of pitch and/or plot provision will most likely influence accessibility to employment, Rugby town and the availability of sustainable transport links.

4.18 The use of natural resources will still be required in delivering a lower level of pitch and plot provision, although at a lower level compared to Options 1 and 2. However, there is the potential to incorporate renewable initiatives and encourage the sustainable use of materials. Therefore, mixed minor positive and minor negative effects are expected in relation to **SA Objective 9: Natural Resources and Renewable Energy**. With any level of pitch and plot provision there is likely to be an increase in waste. However, there could be opportunities for the incorporation of the use of recycling. Therefore, a mixed minor positive and minor negative effect is also expected in relation to **SA Objective 10: Waste**.

4.19 A minor negative effect is expected in relation to **SA Objective 11: Climate Change**. Any level of pitch and plot provision is likely to result in increased energy consumption but this is expected to be minimal. However, under delivery of pitches and plots to meet the evidence-based need could result in longer distances being travelled by Gypsies, Travellers and Travelling Showpeople due to not being able to live where they need or want to be. This could result in an increased in vehicle emissions. Therefore, a minor negative effect is also expected in relation to **SA Objective 14: Sustainable Transport** as well as in relation to **SA Objective 15: Pollution** as a lower level of pitch and plot provision is still likely to result in an increase in air, noise and light pollution and there may be increased air pollution from more vehicle journeys.

Issue 3: Transit Accommodation Need

4.20 Table 4.2 summarises the SA findings for only option under Issue 3 which is appropriate for appraisal against the SA objectives, as recorded earlier in this chapter. A narrative summary of the broad likely effects of smaller or larger transit sites has been provided at the end of this section in relation to option 1 b).

Table 4.2: SA findings for Issue 3 option

SA Objectives	Option 1: a) Plan for level of need identified in 2022 GTAAA
SA Objective 1: Poverty and social exclusion	+
SA Objective 2: Services and facilities	0
SA Objective 3: Health	+

SA Objectives	Option 1: a) Plan for level of need identified in 2022 GTAAA
SA Objective 4: Accommodation	++
SA Objective 5: Crime	0
SA Objective 6: Economy	0
SA Objective 7: Town centre	0
SA Objective 8: Regeneration	0
SA Objective 9: Natural Resources and Renewable Energy	+/-
SA Objective 10: Waste	+/-
SA Objective 11: Climate Change	+/-
SA Objective 12: Flood Risk	+
SA Objective 13: Cultural Heritage	+
SA Objective 14: Sustainable Transport	+
SA Objective 15: Pollution	+/-
SA Objective 16: Biodiversity	+
SA Objective 17: Landscape	+
SA Objective 18: Townscape	+

Summary of SA findings for Issue 3 options

Option 1: a) Should the Council be planning for ? transit/emergency stopping sites in Rugby Borough as identified in the 2022 GTAA?

4.21 Meeting the level of need identified within the 2022 GTAA for transit/emergency stopping sites will provide suitable transit accommodation to meet needs. Providing transit/emergency stopping sites at the level identified as required in the 2022 GTAA is expected to have minor positive effects on **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health** as it will provide locations for suitable transit accommodation supporting improvements in health and wellbeing and reducing social exclusion. A significant positive effect is expected in relation to **SA Objective 4: Accommodation** as this option will plan for the level of transit accommodation required to meet the evidence-based need.

4.22 The use of natural resources will likely be required in delivering transit accommodation as set out with the 2022 GTAA. However, there is the potential to incorporate renewable initiatives and encourage the sustainable use of materials. Therefore, a mixed minor positive and minor negative effect is expected in relation to **SA Objective 9: Natural Resources and Renewable Energy**. A mixed minor positive and minor negative effect is also expected in relation to **SA Objective 10: Waste** as any new transit accommodation will likely result in increased in waste. However, there may be opportunities to incorporate better recycling and re-use of waste on a site, but this will depend on design and location.

4.23 Mixed minor positive and negative effects are expected in relation to **SA Objective 11: Climate Change** and **SA Objective 15: Pollution** as any level of transit accommodation is likely to result in increased energy consumption and increases in air, noise and light pollution but this is expected to be minimal. However, providing the required amount of transit accommodation within the Borough could reduce the need to travel longer distances reducing associated

vehicle emissions. Therefore, a minor positive effect is expected in relation to **SA Objective 14: Sustainable Transport**.

4.24 Providing the required level of transit pitches will also help to reduce unauthorised encampments, which can otherwise be at more risk of negative environmental effects as they may arise in sensitive locations that would not have been used for a planned and authorised transit pitch. Therefore, providing an appropriate number of transit pitches is expected to have minor positive effects on **SA Objectives 9: Natural resources and Renewable Energy, 12: Flood Risk, 13: Cultural Heritage, 16: Biodiversity, 17: Landscape and 18: Townscape**.

Option 1: b) What size should the temporary or transit/emergency stopping sites be?

4.25 As recorded earlier in this chapter, this option is not suitable for appraisal against each of the SA objectives, being an open-ended question. However, it is possible to identify broad in-principle effects of smaller versus larger transit sites and these are described below.

4.26 Smaller and larger sites for temporary/emergency stopping both offer sites for temporary or transit stays. Smaller sites to accommodate temporary or transit/emergency stopping could allow for more variety and flexibility as it is assumed that a larger number of smaller sites would be required to meet the same overall level of provision. This approach could also reduce travel times by reducing the distances between transit/emergency stopping sites, if more smaller sites are provided as opposed to fewer larger sites.

4.27 The provision of either smaller or larger sites is likely to put a strain on natural resources in the immediate area and potentially cause disturbance to the natural environment. However, a larger site will likely put more strain on natural resources within that area and will result in larger areas of land being lost to development within one locality.

4.28 Smaller sites may be better placed to be located within more sustainable locations, allowing better access to sustainable modes of transport and reducing reliance on the private car. Larger sites due to their scale and availability of land are more likely to be located on the edge of town or village centres potentially reducing the proximity to services and employment opportunities. Larger sites are more likely to be located in more rural locations that are less connected to urban centres resulting in increased use of the private vehicle.

4.29 Smaller sites are more likely to have more favourable effects in relation to **SA Objective 1: Poverty and social exclusion; SA Objective 3: Health; SA Objective 4: Accommodation; SA Objective 11: Climate Change; SA Objective 14: Sustainable Transport; and, SA Objective 15: Pollution.** Larger sites are likely to have more favourable effects in relation to **SA Objective 1: Poverty and social exclusion; SA Objective 3: Health; SA Objective 4: Accommodation; and, SA Objective 10: Waste.** However, effects of both smaller and larger sites will be largely determined by their specific locations.

Issue 4: The Location of Permanent Residential Pitches

4.30 There is an uneven distribution of existing authorised Gypsy and Travellers sites across Rugby Borough, with a concentration of the existing sites in the north west of the Borough in Wolvey and Shilton ward and in the west of the Borough in Dunsmore ward. Dunsmore ward includes the only Council owned Gypsy and Traveller site in Rugby Borough. This context is important in considering the likely effects of the options for locating new permanent residential pitches.

4.31 Table 4.3 summarises the SA findings for the options considered in relation to Issue 4. The questions listed in the consultation document under Issue 4 are not appraised as they relate to which of the options (which have been appraised) should be selected.

Table 4.3: SA findings for Issue 4 options

SA Objectives	Option 1 – Increase capacity on existing authorised sites	Option 2 – Expansion of the site area of existing authorised sites	Option 3 – Increase capacity/ expand existing authorised sites outside of Wolvey and Shilton ward, and Dunsmore ward	Option 4: Allocation of new sites around the outskirts of Rugby town and the Main Rural Settlements	Option 5: Allocation of new sites in more rural areas
SA Objective 1: Poverty and social exclusion	+/-	+	+	+	+
SA Objective 2: Services and facilities	+?	+	+/-	+	-
SA Objective 3: Health	+/-	+	+	+	+
SA Objective 4: Accommodation	++	++	++	++	++
SA Objective 5: Crime	0	0	0	0	0
SA Objective 6: Economy	+	+	+/-	+	0
SA Objective 7: Town centre	0	0	0	+	0
SA Objective 8: Regeneration	0	0	0	0	0
SA Objective 9: Natural Resources and	-	-	-	+/-	-

SA Objectives	Option 1 – Increase capacity on existing authorised sites	Option 2 – Expansion of the site area of existing authorised sites	Option 3 – Increase capacity/expand existing authorised sites outside of Wolvey and Shilton ward, and Dunsmore ward	Option 4: Allocation of new sites around the outskirts of Rugby town and the Main Rural Settlements	Option 5: Allocation of new sites in more rural areas
Renewable Energy					
SA Objective 10: Waste	-	+/-	+/-	+/-	+/-
SA Objective 11: Climate Change	+/-	+/-	+/-	+/-	-
SA Objective 12: Flood Risk	-	-	-	0	0
SA Objective 13: Cultural Heritage	0	0	0	0	0
SA Objective 14: Sustainable Transport	+	+	+/-	+	-
SA Objective 15: Pollution	+/-	+/-	+/-	+/-	-
SA Objective 16: Biodiversity	0	-	-	0	-
SA Objective 17: Landscape	0	-	-	0	-
SA Objective 18: Townscape	0	0	0	0	0

Summary of SA findings for Issue 4 options

Option 1: Increase capacity on existing authorised sites, where possible

4.32 A significant positive effect is expected in relation to **SA Objective 4: Accommodation** as increasing the capacity on existing authorised sites will provide more residential pitches to meet the needs of the Gypsy and Travellers. It is likely to be more straightforward to increase capacity at existing sites compared to developing entirely new sites, and so the accommodation needs of Gypsies and Travellers may be more likely to be met under this approach. However, increasing capacity on existing authorised sites, without considering their location or the conditions on those existing sites, could result in negative impacts on the health of residents if there is overcrowding or a decline in the overall living environment. There is potential for a site in poor condition to have an increased capacity at a detriment to Gypsy, Travellers and Travelling Showpeople, potentially increasing poverty levels. However, these existing authorised sites are likely to have been chosen because they have locational advantages for meeting the needs of Gypsies and Travellers. Overall, mixed minor positive and minor negative effects are expected in relation to **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health**.

4.33 The majority of authorised sites in Rugby Borough are located next to major roads including the M69 and A45 and within close proximity to Coventry. Therefore, increasing the capacity of these sites would represent development in a generally sustainable location within close proximity to services/facilities and employment opportunities. However, increasing a site's capacity could have implications for local services, putting a strain on resources such as healthcare facilities and school places. Overall, a minor positive effect is expected in relation to **SA Objective 2: Services and facilities** and **SA Objective 6: Economy** although there is some uncertainty attached in relation to SA objective 2. The nearest authorised site (R09/0971) to Rugby town is approximately three miles away and therefore increasing the capacity of this site is not likely to have an effect on the viability and health of Rugby town and a

negligible effect is expected in relation to **SA Objective 7: Town Centre**. A negligible effect is also expected in relation to **SA Objective 8: Regeneration** as increasing the capacity of the existing authorised sites will not support the regeneration of brownfield land.

4.34 A minor negative effect is expected in relation to **SA Objective 10: Waste** as increasing the capacity of a site will likely result in increased in waste generation. Opportunities to incorporate better recycling and re-use of waste onsite could be limited in comparison to where new sites are developed along with the associated new facilities.

4.35 Four existing authorised sites (R18/1555, R18/0177, R12/1690, R11/0715) lie next to Flood Zone 3 and may be at risk from fluvial flooding in association with the River Avon. Increasing capacity at these authorised sites could put an increased number of Gypsy and Travellers in areas that are susceptible to flood risk. Caravans, motorhomes and park homes are also considered more susceptible to flood risk compared to permanent housing and due to climate change, the risk of flooding will likely increase with heavier rainfalls. Therefore, a minor negative effect is expected in relation to **SA Objective 12: Flood Risk**.

4.36 Mixed minor positive and negative effects are identified in relation to **SA Objective 11: Climate Change** and **SA Objective 15: Pollution** as increasing the capacity of a site is likely to result in increased energy consumption and increases in air, noise and light pollution. However, increasing the capacity of the sites in the most sustainable locations could reduce the need to travel longer distances, reducing associated vehicle emissions, particularly with the majority of the existing sites being located next to a major road or town. Therefore, a minor positive effect is expected in relation to **SA Objective 14: Sustainable Transport**.

4.37 All the existing authorised sites in Rugby Borough are located in the Green Belt and in the countryside. Any further development could have an impact on the integrity of the Green Belt and a negative effect on the natural environment and local landscape. However, increasing the capacity of an authorised site would avoid the removal of further land from the Green Belt. Therefore, a minor

negative effect is expected in relation to **SA Objective 9: Natural Resources and Renewable Energy** and negligible effect in relation to **SA Objective 16: Biodiversity** and **SA Objective 17: Landscape**.

Option 2: Expansion of the site area of existing authorised sites, where possible

4.38 A significant positive effect is expected in relation to **SA Objective 4: Accommodation** as increasing the capacity on existing authorised sites will provide more residential pitches to meet the needs of the Gypsy and Travellers. Expanding existing authorised sites could be favourable as these existing authorised sites are likely to have been chosen due to having locational advantages for meeting the needs of Gypsies and Travellers. The expansion of a site area and allowing a community to grow could have a positive impact on health and support social inclusion. Overall, minor positive effects are expected in relation to **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health**.

4.39 The majority of the existing authorised sites are located next to major roads including the M69 and A45 and within close proximity to Coventry. Therefore, increasing the capacity of these sites would present a sustainable location within close proximity to services/facilities and employment opportunities. However, increasing a site capacity could have implications for local services putting a strain on resources such as health and school. Overall, a minor positive effect is expected in relation to **SA Objective 2: Services and facilities** and **SA Objective 6: Economy**. The nearest authorised site (R09/0971) to Rugby town is approximately three miles away and therefore increasing the capacity of this site is not likely to have an effect on the viability and health of Rugby town. Overall, a negligible effect is expected in relation to **SA Objective 7: Town Centre**. A negligible effect is also expected in relation to **SA Objective 8: Regeneration** as increasing the size of the existing authorised sites will not support the use of previously developed land.

4.40 A mixed minor positive and minor negative effect is expected in relation to **SA Objective 10: Waste** as increasing the capacity of a site will likely result in increased in waste. However, there may be opportunities to incorporate better recycling and re-use of waste as part of the expansion of an existing site area but this will depend on design and location.

4.41 Four authorised sites (R18/1555, R18/0177, R12/1690, R11/0715) lie next to Flood Zone 3 meaning that they are at risk from fluvial flooding associated with the River Avon. Expansion of these authorised sites could result in parts of the sites falling within Flood Zone 3. Caravans, motorhomes and park homes are more susceptible to flood risk compared to permanent housing and due to climate change, the risk of flooding will likely increase with heavier rainfalls. Therefore, a minor negative effect is expected in relation to **SA Objective 12: Flood Risk**.

4.42 Mixed minor positive and negative effects are expected in relation to **SA Objective 11: Climate Change** and **SA Objective 15: Pollution** as increasing the area of a site is likely to result in increased energy consumption and increases in air, noise and light pollution. However, increasing the area of the sites in the most sustainable locations could reduce the need to travel longer distances, reducing associated vehicle emissions particularly given that the majority of existing sites are located next to a major road or town. Therefore, a minor positive effect is expected in relation to **SA Objective 14: Sustainable Transport**.

4.43 All the existing authorised sites in Rugby Borough are located in the Green Belt and in the countryside. Any further development beyond the existing site boundaries could have an impact on the integrity of the Green Belt and a negative effect on the natural environment and local landscape. However, the scale of Green Belt release is likely to be minimal. Therefore, minor negative effects are expected in relation to **SA Objective 9: Natural Resources and Renewable Energy**; **SA Objective 16: Biodiversity** and **SA Objective 17: Landscape**.

Option 3: Increase capacity/expand existing authorised sites outside of Wolvey and Shilton ward, and Dunsmore ward

4.44 Increasing the capacity/expanding existing authorised sites outside of Wolvey and Shilton Ward and Dunsmore Ward would create a more equal distribution of sites across Rugby Borough, providing more variety and flexibility in terms of site locations. A significant positive effect is expected in relation to **SA Objective 4: Accommodation** as increasing the capacity/expanding existing authorised sites (including in this location) will provide more residential pitches to meet the needs of the Gypsy and Travellers. Expanding existing authorised sites could be favourable as these existing authorised sites are likely to have been chosen due to having locational advantages for meeting the needs of Gypsies and Travellers. The expansion of a site area and allowing a community to grow could have a positive impact on health and support social inclusion. Overall, minor positive effects are expected in relation to **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health**.

4.45 Two of the authorised sites (R14/0546 and R09/0971) outside of Wolvey and Shilton ward and Dunsmore ward are located within more rural parts of the borough and therefore residents at those sites will likely have to travel longer distance using private car to access to services/facilities and employment opportunities. Residents at these sites may also be less likely to take up opportunities to use sustainable transport modes. The other four authorised sites (R11/0715, R18/1555, R18/0177, R12/1690) are located on the outskirts of Coventry within Rugby Borough and therefore are more accessible to a large variety of services/facilities and employment opportunities. The sites lie in close proximity to the A45 where there are bus stops. Overall mixed minor positive and minor negative effects are therefore expected in relation to **SA Objective 2: Services and facilities** and **SA Objective 6: Economy**.

4.46 A mixed minor positive and minor negative effect is expected in relation to **SA Objective 10: Waste** as increasing the capacity/expanding a site (including in this location) will likely result in increased in waste. However, there may be

opportunities to incorporate better recycling and re-use of waste on a site, but this will depend on design and location.

4.47 Four authorised sites (R18/1555, R18/0177, R12/1690, R11/0715) outside of Wolvey and Shilton ward and Dunsmore ward fall next to Flood Zone 3 where there is a risk of fluvial flooding in association with the River Avon. Increasing the capacity of, or expanding, these authorised sites could put an increased number of Gypsy and Travellers in areas that are susceptible to flood risk. Caravans, motorhomes and park homes are also considered more susceptible to flood risk and due to climate change, the risk of flooding will likely increase with heavier rainfalls. Therefore, a minor negative effect is expected in relation to **SA Objective 12: Flood Risk**.

4.48 The four authorised sites (R11/0715, R18/1555, R18/0177, R12/1690) outside of Wolvey and Shilton ward, and Dunsmore ward located on the outskirts of Coventry within Rugby Borough will have good access to bus links along the A45 reducing the need for a private car. This will reduce associated vehicle emissions and the impact on climate change and pollution levels. The other two authorised sites (R14/0546, R09/0971) outside of Wolvey and Shilton ward, and Dunsmore ward sit in more rural parts of the borough and so residents will be more reliant on the use of a private vehicle. However, any increase in capacity/expansion of a site will likely result in an increase in energy consumption. Therefore, mixed minor positive and minor negative effects are expected in relation to **SA Objective 11: Climate Change**, **SA Objective 14: Sustainable Transport** and **SA Objective 15: Pollution**.

4.49 The existing authorised sites outside of Wolvey and Shilton ward and Dunsmore ward in Rugby Borough are located in the Green Belt and in the countryside. Any further development involving increasing the site area of those sites could have an impact on the integrity of the Green Belt and a negative effect on the natural environment and local landscape. However, the scale of Green belt release is likely to be minimal. Therefore, a minor negative effect is expected in relation to **SA Objective 9: Natural Resources and Renewable Energy**; **SA Objective 16: Biodiversity** and **SA Objective 17: Landscape**.

Option 4: Allocation of new sites around the outskirts of Rugby town and the Main Rural Settlements as identified in Policy GP2 of the Rugby Borough Local Plan with good access to services and facilities.

4.50 The allocation of new sites around the outskirts of Rugby town and the main rural settlements will provide the accommodation needed for Gypsy and Travellers. Therefore, a significant positive effect is expected in relation to **SA Objective 4: Accommodation**. Minor positive effects on **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health** are also likely as this approach will provide locations for suitable accommodation supporting improvements in health and reducing poverty.

4.51 Minor positive effects are expected in relation to **SA Objective 2: Services and facilities**; **SA Objective 6: Economy** and **SA Objective 7: Town Centre**. The allocation of new sites around the outskirts of Rugby town and main rural settlements will allow for better access to a variety of services and facilities and employment opportunities. New development on the outskirts of Rugby town or a main rural settlement also has the potential support and enhance the viability of that town centre and/or main rural settlement.

4.52 The use of natural resources will likely be required in delivering the new site allocations, regardless of location. However, there is the potential to incorporate renewable initiatives and encourage the sustainable use of materials. Therefore, a mixed minor positive and minor negative effect is expected in relation to **SA Objective 9: Natural Resources and Renewable Energy**. A mixed minor positive and minor negative effect is also expected in relation to **SA Objective 10: Waste** as allocating a new site will likely result in increased in waste. However, there may be opportunities to incorporate better recycling and re-use of waste on a site but this will depend on design and location.

4.53 Minor positive effects are expected in relation to **SA Objective 14: Sustainable Transport** as locating new sites around the outskirts of Rugby

town and the main rural settlements will likely provide better access to sustainable transport modes and reduce the need to travel longer distances and reduce the use of a private vehicle. Overall, this will reduce vehicle related emissions and limit increases in pollution levels. However, new development is expected to increase emissions levels slightly and energy consumptions. Therefore, mixed minor positive and minor effects are expected in relation **SA Objective 10: Climate Change** and **SA Objective 15: Pollution**.

Option 5 – Allocation of new sites in more rural areas (Rural Villages and Countryside), but still with reasonable access to essential services [Contrary to Policy GP2]

4.54 A significant positive effect is expected in relation to **SA Objective 4: Accommodation** as the allocation of new sites will provide more residential pitches to meet the needs of the Gypsy and Travellers. Overall, minor positive effects are expected in relation to **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health**. The allocation of new sites in more rural areas will support the health and wellbeing of Gypsy and Travellers reducing levels of poverty although it is noted that access to healthcare facilities may be less good in rural locations.

4.55 Sites allocated in more rural areas are less likely to be accessible to services/facilities and employment opportunities. Therefore a minor negative effect is expected in relation to **SA Objective 2: Services and facilities** and a negligible effect in relation to **SA Objective 6: Economy**.

4.56 A mixed minor positive and minor negative effect is expected in relation to **SA Objective 10: Waste** as the allocation of new sites will likely result in increased in waste. However, there may be opportunities to incorporate better recycling and re-use of waste on a site but this will depend on design and location.

4.57 The allocation of sites in more rural areas is less likely to provide good access to sustainable transport links, increasing the reliance on the private car.

This would therefore increase vehicle related emissions and contribute to climate change. Development of a new site in any location will also result in an increase in energy consumption. Overall, minor negative effects are expected in relation to **SA Objective 11: Climate Change**, **SA Objective 14: Sustainable Transport** and **SA Objective 15: Pollution**.

4.58 Any further development in more rural areas could have a negative impact on the integrity of the Green Belt and on the natural environment and local landscape. Much of Rugby Borough outside of Rugby town is classed as Grade 3 Agricultural Land and the allocation of sites in rural areas could therefore result in the loss of this higher grade agricultural land. Therefore, a minor negative effect is expected in relation to **SA Objective 9: Natural Resources and Renewable Energy**; **SA Objective 16: Biodiversity** and **SA Objective 17: Landscape**. A negligible effect is expected in relation to **SA Objective 8: Regeneration** as allocating new sites in more rural areas will most likely not support the use of previously developed land.

Issue 5: Location of Transit Pitches

4.59 Table 4.4 overleaf summarises the SA findings for the options considered under Issue 5.

Table 4.4: SA findings for Issue 5 options

SA Objectives	Option 1: One or two single sites close to Rugby	Option 2: Along highway corridors	Option 3: Combined residential/transit pitches
SA Objective 1: Poverty and social exclusion	+	+	+
SA Objective 2: Services and facilities	+	0	0

Chapter 4 Sustainability Appraisal Findings for the DPD Options

SA Objectives	Option 1: One or two single sites close to Rugby	Option 2: Along highway corridors	Option 3: Combined residential/transit pitches
SA Objective 3: Health	+	+	+
SA Objective 4: Accommodation	++	++	++
SA Objective 5: Crime	0	0	0
SA Objective 6: Economy	+	0	0
SA Objective 7: Town centre	0	0	0
SA Objective 8: Regeneration	0	0	0
SA Objective 9: Natural Resources and Renewable Energy	-	-	+/-
SA Objective 10: Waste	+/-	+/-	+/-
SA Objective 11: Climate Change	0	-	+/-
SA Objective 12: Flood Risk	0	0	0
SA Objective 13: Cultural Heritage	0	0	0
SA Objective 14: Sustainable Transport	+	0	+
SA Objective 15: Pollution	0	-	+/-
SA Objective 16: Biodiversity	0	0	0
SA Objective 17: Landscape	0	0	0
SA Objective 18: Townscape	0	0	0

Summary of SA findings for Issue 5 options

Option 1: One or two single sites close to Rugby

4.60 Providing one or two single sites for transit use close to Rugby town provides little flexibility and variety in sites across Rugby Borough for transiting Travellers. However, the provision of transit sites will provide the accommodation needs for transit communities improving health and wellbeing and reducing poverty levels. Therefore, a minor positive effect is expected in relation to **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health** and a significant positive effect is expected in relation to **SA Objective 4: Accommodation**. One or two sites could result in transit communities having to travel further to reach a site due their limited location. However, providing transit pitches in close proximity to Rugby town provides better opportunities to access services and facilities and sustainable transport modes. There would also be improved access to employment opportunities, although this may not be relevant to users of transit sites. Therefore, minor positive effects are expected in relation to **SA Objective 2: Services and facilities**; **SA Objective 6: Economy** and **SA Objective 14: Sustainable Transport**.

4.61 Providing transit sites close to Rugby town may help to enhance the vitality and viability of the town centre by slightly increasing footfall, although any such effects are unlikely to be of a measurable scale due to the small numbers of people. Therefore, a negligible effect is likely in relation to **SA Objective 7: Town centre**.

4.62 A minor negative effect is expected in relation to **SA Objective 9: Natural resources and Renewable Energy** as new development will put more strain on natural resources concentrated around Rugby town. A mixed minor positive and minor negative effect is expected in relation to **SA Objective 10: Waste** as any new site will likely result in increased in waste. However, one or two single sites may offer more opportunities to incorporate better recycling and re-use of waste onsite but this will depend on design and location.

4.63 Due to the transit sites' close proximity to Rugby town and public transport links, effects on pollution and climate change under this option are likely to be limited. However, transit sites are used for Gypsy, Travellers and Travelling Showpeople that are continually moving and use of public transport modes is likely limited. Therefore, a negligible effect is expected in relation to **SA Objective 11: Climate Change** and **SA Objective 15: Pollution**.

Option 2: Along highway corridors. This would need to be informed through local evidence of traditional Traveller movement patterns across Rugby Borough along with detailed highways discussions.

4.64 The two main highway corridors that run through Rugby Borough are the A45 to Coventry and the M6 to Birmingham. Providing transit sites along highway corridors used by Travellers provides easy access to the sites and sites for accommodation along evidenced routes used by Travellers. The provision of transit sites will provide the accommodation needs for Travellers improving health and wellbeing and reducing poverty levels. Therefore, a minor positive effect is expected in relation to **SA Objective 1: Poverty and social exclusion** and **SA Objective 3: Health**. A significant positive effect is expected in relation to **SA Objective 4: Accommodation**.

4.65 A minor negative effect is expected in relation to **SA Objective 9: Natural resources and Renewable Energy** as new development will put more strain on natural resources and result on loss of land to development. Providing transits sites along highway corridors allows for easy waste and recycling collection, potentially reducing the negative impact on the level of waste produced through a development. However, all development produces waste and therefore a mixed minor positive and minor negative effect is expected in relation to **SA Objective 10: Waste**.

4.66 Providing transit sites along highway corridors could encourage the use of private vehicles increasing vehicles emissions and pollution levels adding to climate change. In particular, there could be an issue with noise pollution from

highway corridors. Therefore, a minor negative effect is expected in relation to **SA Objective 11: Climate Change** and **SA Objective 15: Pollution**. There are limited bus routes running along the A45 with the main bus stop located within Ryton-on-Dunsmore on the outskirts of Coventry within Rugby Borough. Therefore, a negligible effect is likely in relation to **SA Objective 14: Sustainable Transport**.

Option 3: Combined residential/transit pitches where provision for one or two pitches are provided for in conjunction with new permanent residential pitch provision

4.67 Option 3 will provide the required need for transit pitches supporting Gypsy, Travellers and Travelling Showpeople. Providing transit pitches alongside residential pitch provision offers opportunities for community cohesion with permanent communities. The delivery of transit pitches will support healthy living and improve levels of poverty. Therefore, minor positive effects are expected in relation to **SA Objective 1: Poverty and social exclusion**; **SA Objective 3: Health**; and a significant positive effect is likely in relation to **SA Objective 4: Accommodation**.

4.68 Combined residential/transit pitches offer the opportunity to share utilities and waste provision. This could improve the efficiency of recycling and waste provision through larger facilities on site. There would also be better opportunities to incorporate renewable energy. However, any development will likely have some impact on natural resources and the natural environment, although this will likely be minimal. Therefore, mixed minor negative and minor positive effect are expected in relation to **SA Objective 9: Natural Resources and Renewable Energy** and **SA Objective 10: Waste**.

4.69 The provision of transit pitches within sustainable locations (where permanent sites are most likely to be found) could reduce reliance on the private car and encourage the use of sustainable transport modes. Therefore, a minor positive effect is expected in relation to **SA Objective 14: Sustainable Transport**. This has the potential to reduce vehicle emissions associated with a

site. However, emissions and other forms of pollution are expected from any development though minimal. Overall, mixed minor positive and minor negative effects are expected in relation to **SA Objective 12: Climate Change** and **SA Objective 15: Pollution**.

Issue 6: Size of sites

4.70 Table 4.5 summarises the SA findings for the options associated with Issue 6.

Table 4.5: SA findings for Issue 6 options

SA Objectives	Option 1: Provide fewer larger permanent sites	Option 2: Provide a greater number of smaller sites
SA Objective 1: Poverty and social exclusion	+	+
SA Objective 2: Services and facilities	?	?
SA Objective 3: Health	+	+
SA Objective 4: Accommodation	++	++
SA Objective 5: Crime	0	0
SA Objective 6: Economy	?	?
SA Objective 7: Town centre	?	?
SA Objective 8: Regeneration	0	0
SA Objective 9: Natural Resources and Renewable Energy	-	0
SA Objective 10: Waste	+/-	-

SA Objectives	Option 1: Provide fewer larger permanent sites	Option 2: Provide a greater number of smaller sites
SA Objective 11: Climate Change	-	+/-
SA Objective 12: Flood Risk	0	0
SA Objective 13: Cultural Heritage	0	0
SA Objective 14: Sustainable Transport	-	+
SA Objective 15: Pollution	-	+/-
SA Objective 16: Biodiversity	0	0
SA Objective 17: Landscape	0	0
SA Objective 18: Townscape	0	0

Summary of SA findings for Issue 6 options

Option 1: Provide fewer larger permanent sites to accommodate, for example, no more than 10 pitches each

4.71 Providing fewer larger permanent sites will not affect meeting the total accommodation need of Gypsy, Travellers and Travelling Showpeople and improving standards of living. Larger permanent sites will likely offer a greater community and provide more security. Therefore, minor positive effects are expected in relation to **SA Objective 1: Poverty and social exclusion**, **SA Objective 3: Health** and a significant positive effect is expected in relation to **SA Objective 4: Accommodation**.

4.72 Larger sites, due to their scale and requirements for land, are more likely to be located on the edge of town or village centres, potentially reducing the proximity to services and employment opportunities. However, this is variable depending on the actual location of the site. Therefore, an uncertain effect is identified in relation to **SA Objective 2: Services and Facilities**, **SA Objective 6: Economy** and **SA Objective 7: Town centre**.

4.73 A minor negative effect is expected in relation to **SA Objective 9: Natural resources and Renewable Energy** as larger site will put more strain on natural resources within that area and will result in a few large areas of land being lost to development. A mixed minor positive and minor negative effect is expected in relation to **SA Objective 10: Waste** as any new site will likely result in increased in waste. However, larger sites may offer more opportunities to incorporate better recycling and re-use of waste onsite but this will depend on design and location.

4.74 Larger sites are more likely to be located in more rural locations that are less connected to urban centres resulting in increased use of the private vehicle. This would likely result in an increase in vehicle emissions having a negative impact on climate change and increasing pollution levels. Therefore, minor negative effects are expected in relation to **SA Objective 11: Climate Change**, **SA Objective 14: Sustainable Transport** and **SA Objective 15: Pollution**.

Option 2: Provide a greater number of smaller sites to accommodate, for example, no more than 2 pitches each

4.75 Providing a greater number of smaller sites will not affect meeting the total accommodation need of Gypsy, Travellers and Travelling Showpeople and improving standards of living. Provision of a great number of smaller sites to accommodate Gypsy, Traveller and Travelling Showpeople allows for more variety and flexibility in accommodation available to these communities. Therefore, a minor positive effect is expected in relation to **SA Objective 1:**

Poverty and social exclusion, SA Objective 3: Health and a significant positive effect in relation to **SA Objective 4: Accommodation**.

4.76 Smaller sites may be more likely to be located near a town or village centre which would offer better access to employment and services and facilities. However, this is uncertain and depends on the actual location of the site. Therefore, an uncertain effect is identified in relation to **SA Objective 2: Services and Facilities, SA Objective 6: Economy** and **SA Objective 7: Town centre**.

4.77 The provision of a greater number of smaller is likely to put a strain on natural resources in the immediate area and cause as much disturbance to the natural environment as Option 1 as the same total land area would be required and there may be disturbance in more individual areas. Therefore, a negligible effect is expected in relation to **SA Objective 9: Natural Resources and Renewable Energy**. A minor negative effect is expected in relation to **SA Objective 10: Waste** as any new site will likely result in increased in waste. Smaller sites may not be able to process waste and manage recycling as efficiently but this will depend on design and location.

4.78 Smaller sites are better placed to be located within more sustainable locations allowing better access to sustainable modes of transport and reducing reliance on the private car. Therefore, this could reduce the level of vehicle emissions. However, any development is likely to increase emissions levels though minimal. Overall, mixed minor positive and minor negative are expected in relation to **SA Objective 11: Climate Change** and **SA Objective 15: Pollution**. A minor positive effect is expected in relation to **SA Objective 14: Sustainable Transport**.

Issue 7: Design Standards

4.79 The options set out under this Issue are not of a format suitable for detailed appraisal against each SA objective, as recorded earlier in this chapter. The options centre around whether the design standard from the adopted Local

Plan are appropriate, or whether other design standards should be set. It is not appropriate for this SA report to appraise policy from the adopted Local Plan. Therefore, the section below provides an overview of the key issues and likely effects associated with potentially increasing or decreasing the design standards to be set out in the DPD.

Summary of SA findings of Issue 7 options

4.80 Setting stringent design standards for all Gypsy, Travellers and Travelling Showpeople sites could ensure higher standards of living and restrictions on the density of sites reducing the risk of overcrowding and poor living conditions. High design standards can also allow for minimum standards to be set in relation to utilities, further supporting healthy living and higher standards of living for Gypsy, Travellers and Travelling Showpeople. Therefore, an approach involving setting high design standards would likely have positive effects in particular in relation to **SA Objective 1: Poverty and Social exclusion**, **SA Objective 3: Health** and **SA Objective 4: Accommodation**. Well-designed Gypsy, Traveller and Travelling Showpeople sites can support the use of sustainable transport options and offer a safe environment that encourages community cohesion.

4.81 However, setting higher and more restrictive design standards could affect the deliverability of sites and so standards should be balanced with the need to ensure that sites are delivered to meet the identified local needs.

4.82 Any draft DPD policy setting out specific design standards for Gypsy and Traveller sites will be subject to SA later in the plan-making process, once the details of the standards are known.

Issue 8: Site assessment criteria

4.83 The options set out in relation to this issue relate to the site assessment criteria listed in the adopted Local Plan and whether they are suitable. The role

of this SA is not to appraise existing policy within Rugby Borough Local Plan 2011-2031, including Policy DS2. Therefore, the options set out in relation to this issue have not been appraised; however any policy that may be drafted for inclusion in the DPD in relation to site assessment criteria will be appraised when it has been worked up by plan-makers.

Chapter 5

Monitoring

5.1 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” and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring”. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

5.2 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. Given the relatively early stage of the DPD, indicators for all SA objectives have been included. The suggested indicators will be updated at the next stage of the SA to focus on the SA objectives against which significant (including uncertain) effects have been recorded.

5.3 The proposed SA monitoring framework for the Rugby Borough Gypsy and Traveller Site Allocations DPD below sets out a number of suggested indicators for monitoring the potential sustainability effects of the DPD. 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 a dialogue with statutory environmental consultees and other stakeholders 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.

Proposed SA Monitoring Framework for the Rugby Borough Gypsy and Traveller Site Allocations DPD

SA Objective 1

- Reduce/eliminate poverty, disadvantage and social exclusion

Indicator

- Access to community facilities for Gypsies and Travellers
- Access to employment opportunities for Gypsies and Travellers
- Fuel poverty
- Number of Gypsies and Travellers claiming Jobseekers' Allowance

SA Objective 2

- Encourage increased engagement in leisure, cultural activity, recreation and improve access across all sections of the community

Indicator

- Access to community facilities
- Number of sites allocated within proximity to Rugby town centre
- Access to open space and sport and recreation facilities

SA Objective 3

- Protect and enhance the health and well-being of the Gypsy, Traveller and Travelling Showperson communities and reduce health inequalities

Indicator

- Life expectancy
- Accessibility to healthcare facilities
- Infant mortality rates
- Obesity rates
- Number of Gypsy and Travellers living with a disability
- Percentage of Gypsy and Travellers regularly participating in sport

SA Objective 4

- Provide all Gypsies, Travellers and Travelling Showpeople with the opportunity to live in a decent home which meets their needs

Indicator

- Supply and delivery of allocated sites
- Number of Gypsies and Travellers in accommodation need (GTAA)
- Annual brick and mortar accommodation completions
- Total vacant pitches
- Total number of Gypsy and Traveller pitches
- Number of homeless Gypsy and Travellers
- Number or proportion of brick and mortar accommodation falling below Decent Homes Standards

SA Objective 5

- Reduce crime, fear of crime and anti-social behaviour

Indicator

- Number of crimes reported against Gypsies and Travellers

SA Objective 6

- Promote/enable a strong, stable and sustainable local economy

Indicator

- Amount of sites allocated near areas of employment
- Amount of employment land lost to alternative uses
- Number of Gypsies and Travellers claiming Jobseekers Allowance

SA Objective 7

- Promote the vitality and viability of the town centre

Indicator

- Number of sites allocated within proximity to Rugby town centre
- Number of sites allocated within Rugby Town centre

SA Objective 8

- Promote the regeneration of urban areas

Indicator

- Percentage of sites allocated on previously developed land

SA Objective 9

- Use and manage land, energy, soil, mineral and water resources prudently and efficiently, and increase energy generated from renewables

Indicator

- Percentage of sites allocated on previously developed land
- Number of planning applications approved within a Minerals Consultation Area
- Amount of sites allocated on best and most versatile agricultural land
- Number of bricks and mortar accommodation built each year above required building standards for energy efficiency
- Number of bricks and mortar accommodation that meet the required water efficiency target

SA Objective 10

- Minimise waste and manage it sustainably

Indicator

- Amount of waste sent to landfill
- Proportion of household waste recycled
- Proximity of site allocation to a recycling centre.

SA Objective 11

- Reduce the Borough's contribution to climate change

Indicator

- Number of new sites allocated incorporating low carbon technologies
- Installed renewable energy capacity

SA Objective 12

- Avoid, reduce and manage flood risk

Indicator

- Amount of site allocations within flood zones 2 and 3
- Number of planning permissions granted contrary to Environment Agency advice
- Number of new sites allocated incorporating SUDS

SA Objective 13

- Conserve and enhance the historic environment, heritage assets and their settings

Indicator

- Number of site allocations in close proximity to a heritage asset

SA Objective 14

- Promote a sustainable and accessible transport network

Indicator

- Proportion of people who can travel to work by public transport
- Proportion of people who have good access to railway station and bus stop
- Number of users of cycle paths

SA Objective 15

- Reduce all forms of pollution

Indicator

- Number of car borne journeys from site allocation
- Number of planning permissions granted contrary to sustained objection of the Environment Agency on water quality grounds

SA Objective 16

- Conserve and where possible enhance the Borough's biodiversity, flora and fauna

Indicator

- Amount of greenfield land lost to site allocation
- Impact of site allocation on SSSIs
- Number of Local Wildlife Sites close to site allocation Number of site allocations that takes place on Local Green spaces

SA Objective 17

- Maintain and where possible enhance the quality of landscapes

Indicator

- Percentage of sites allocated on brownfield land

SA Objective 18

- Maintain and where possible enhance the quality of townscapes

Indicator

- Percentage of sites allocated on previously developed land

Chapter 6

Conclusions and Next Steps

6.1 The SA of the Issues and Options version of the Rugby Borough Gypsy and Traveller Site Allocations DPD has been undertaken to accord with current best practice and the guidance on SA/SEA as set out in the National Planning Practice Guidance. The SA objectives developed at the Scoping stage of the SA process have been used to undertake an appraisal of the options in the current consultation document, where they are of a format that enables this. Where options comprise open ended questions and so are not able to be appraised, any draft policies that relate to those issues will be appraised at the next stage of the SA process.

6.2 Most of the options considered in the Issues and Options version of the Rugby Borough Gypsy and Traveller DPD focus on the extent of accommodation provision that should be made for Gypsies and Travellers, as well as the high level approach to where this provision should be made, particularly whether provision should be made as part of new sites or expanding/increasing the capacity of existing sites. The SA has shown a wide range of effects across the objectives; however it is clear that planning to meet the evidence-based need for accommodation will have more positive effects than failing to do so.

6.3 Mainly positive effects are expected in relation to some of the SA objectives, particularly in relation to poverty and social exclusion, accommodation, and health, regardless of how and where accommodation provision is made – as long as it is made at the required level. However, more variety in effects is evident for the options that consider smaller versus larger sites, or sites closer to Rugby and the main settlements compared to more rural areas. In general, locating sites in better connected areas will have more positive effects on the SA objectives. Focussing the majority of new sites and/or increasing capacity/expansion of sites in close proximity to Rugby town or Coventry will maximise access to jobs, services and facilities, and should help to stimulate the use of non-car based modes of transport.

6.4 If reasonable alternative site options are identified through the Call for Sites that will run in parallel to the Issues and Options consultation, these will be subject to SA at the next stage along with any draft policies worked up for inclusion in the DPD. At that stage, consideration will also be able to be given to the likely cumulative effects of the DPD.

Next Steps

6.5 This SA Report will be available for consultation alongside the Issues and Options document during Summer 2022.

6.6 The consultation responses on the Issues and Options Version of this DPD and this SA Report will be taken into account in the next stages of the DPD preparation process.

LUC

June 2022

Appendix A

Scoping Consultation Comments

A.1 The consultation on the SA Scoping Report for the Rugby Borough Gypsy and Traveller Site Allocations DPD took place between 4th May and 10th June 2022.

A.2 Set out below are a summary of consultee comments received on the SA Scoping Report and the SA team's response to these comments.

Consultee comments received on the SA Scoping Report

Comments received from statutory consultee:

Historic England

■ Summary of comment:

- Pleased to see consideration of non-designated heritage assets, and reference to the setting of historic assets, as well as particular regard to protecting heritage assets which have been identified as being 'at risk'.
- Welcomes that HEAN8 is included within the relevant national plans, policies and programmes and also that other Historic England publications are noted in para.2.21 and at Appendix A.
- A more comprehensive list of relevant plans, policies and programmes reference should be made
- Reference should be made to the published Character Appraisals for the Borough's 19 conservation areas and to The Warwickshire Historic Landscape Characterisation (HLC) project.

Appendix A Scoping Consultation Comments

- Pleased to see that this baseline presents a comprehensive background into the designated and non-designated heritage assets, and also encompasses heritage at risk.
- Query the necessity for the note alongside Figure 3.5. References to English Heritage should be amended to refer to Historic England. The Local Authority is responsible for Conservation Area designation and de-designation and therefore should have information relating to designations, and also the information on Conservation Area Appraisals and Management Plans.
- Welcomes that heritage at risk has been identified as a key sustainability issue and the recognition that the SA process provides an opportunity to guide development to new sites for Gypsies and Travellers to locations which are less sensitive in terms of their impact on heritage Assets.
- Welcomes SA Objective 13, 17 and 18 and associated appraisal questions.
- With reference to SA Objective 13 we would query as to how the 500m distance figure has been derived? Historic England do not recommend stipulating a specific figure, although we welcome the acknowledgment that there may still be some potential for impacts on non-designated heritage features and that the effects on designated heritage assets may extend beyond 500m in some cases.
- Historic England considers that the amendments are necessary to ensure that it meets the requirements of the Directive and Legislation.
- Action taken:
 - Relevant plans and programmes have been updated.
 - Reference has been made to the published Character Appraisals for the Borough's conservation areas and to The Warwickshire Historic Landscape Characterisation (HLC) project.
 - The note on Figure 3.5 has been removed.
 - Reference to the 500m distance has been removed from SA Objective 13.

Appendix B

Review of Relevant Plans, Policies and Programmes

International plans and programmes of most relevance for the DPD

B.1 The Glasgow Climate Pact 2021 was adopted at the COP26 UN climate conference in November 2021. The Pact sees signatory countries increase climate ambition and action from the Paris Agreement in 2015 and sets out new rules to reduce greenhouse gas emissions including phasing down coal and a global carbon market. The Glasgow Climate Pact is the first global agreement to explicitly include parties pledging to reduce the use of fossil fuels.

B.2 The 2030 Agenda for Sustainable Development (2015): This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 1: No Poverty
- SDG 2: Zero Hunger
- SDG 3: Good Health and Well-being
- SDG 4: Quality Education
- SDG 5: Gender Equality
- SDG 10: Reduced Inequalities
- SDG 11: Sustainable Cities and Communities

B.3 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998) - Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

B.4 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) - Sets broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

B.5 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage 1972 seeks to protect both cultural and natural heritage. The Convention defines the kind of sites which can be considered for inscription of the World Heritage List (ancient monuments, museums, biodiversity and geological heritage all come within the scope of the Convention) and sets out the duties of States Parties in identifying potential sites and their role in protecting them.

B.6 European Environmental Noise Directive (2002) - Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.

B.7 European Nitrates Directive (1991) - Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.

B.8 European Urban Waste Water Directive (1991) - Protects the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.

B.9 European Air Quality Framework Directive (1996) and Air Quality

Directive (2008) - Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.

B.10 European Drinking Water Directive (1998) - Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.

B.11 European Landfill Directive (1999) - Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.

B.12 European Water Framework Directive (2000) - Protects inland surface waters, transitional waters, coastal waters and groundwater.

B.13 European Waste Framework Directive (2008) - Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health.

B.14 European Industrial Emission Directive (2010) - Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

B.15 European Floods Directive (2007) - A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

B.16 European Energy Performance of Buildings Directive (2010) - Aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.

B.17 United Nations Paris Climate Change Agreement (2015) - International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

B.18 International Convention on Wetlands (Ramsar Convention) (1976) - International agreement with the aim of conserving and managing the use of wetlands and their resources.

B.19 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) - Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

B.20 International Convention on Biological Diversity (1992) - International commitment to biodiversity conservation through national strategies and action plans.

B.21 European Habitats Directive (1992) - Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

B.22 European Birds Directive (2009) - Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

B.23 United Nations Declaration on Forests (COP26 Declaration) (2021) -

Sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

B.24 United Nations (UNESCO) World Heritage Convention (1972) -

Promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

B.25 European Convention for the Protection of the Architectural Heritage of Europe (1985) - Defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

B.26 European Landscape Convention (2002) - Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National plans and programmes (beyond the NPPF) of most relevance for the DPD

Climate change adaptation and mitigation

B.27 UK Climate Change Strategy 2021-2024 - In 2019 the UK became the first major economy to pass into law a domestic requirement for net zero greenhouse gas emissions by 2050. Now, we are also committing to net zero greenhouse gas emissions by 2050 across UKEF’s portfolio and operations. The Strategy is split across five strategic pillars:

- By increasing our support to clean growth and climate adaptation

Appendix B Review of Relevant Plans, Policies and Programmes

- By reducing our portfolio greenhouse gas emissions
- By understanding and mitigating our climate-related financial risk
- Through transparency and disclosure
- By providing international leadership on climate change amongst export credit agencies and relevant financial institutions

B.28 The British Energy Security Strategy (2022) sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aims to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas - a licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plant to consult on developing partnerships with a limited number of supportive communities who wish to

host new onshore wind infrastructure in return for guaranteed lower energy bills.

- Heat pump manufacturing: The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

B.29 Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018) sets out the strategy for adapting both to the climate change that is already evident, and that which we might see in the future.

B.30 Department for Transport, Decarbonising Transport: Setting the Challenge (2021) sets out the strategic priorities for a new Transport Decarbonisation Plan (TDP), published in July 2021, will set out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP will take a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.31 Defra and the Environment Agency, Understanding the risks, empowering communities, building resilience: The National Flood and Coastal Erosion Risk Management Strategy for England (2020) sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. An update to the document was adopted on 25th September 2020.

B.32 National Planning Policy for Waste (NPPW) (2014) sets out a number of key planning objectives. It requires that local planning authorities help deliver sustainable development through measures including driving waste

management up the waste hierarchy; ensuring that waste management is considered alongside other spatial planning concerns; and providing a framework in which communities can take more responsibility for their own waste.

B.33 The Industrial Decarbonisation Strategy (2021) aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050.

B.34 Defra, Waste Management Plan for England (2013) sets out the measures for England to work towards a zero waste economy.

B.35 HM Government, The Clean Growth Strategy (2017) sets out the approach of the government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

B.36 The UK Hydrogen Strategy (2021) sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030.

B.37 British Energy Security Strategy (2022) seeks to reduce the UK's reliance on international fossil fuel markets to strengthen energy security and

cut bills over the next decade. To enable this is a new ambition to produce 95% of the country's electricity from low-carbon sources by 2030. The strategy includes a range of new targets to accelerate the deployment of key low carbon technologies, alongside renewed support for domestic oil and gas production.

B.38 The Energy Performance of Buildings Regulations (2021) seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

B.39 The Energy white paper: Powering our net zero future (2020) builds on the Prime Minister's Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050.

B.40 The Heat and Buildings Strategy (2021) sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.

Appendix B Review of Relevant Plans, Policies and Programmes

- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

B.41 The Net Zero Strategy: Build Back Greener (2021) - sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon

budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste); and,
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

B.42 The 25 Year Environment Plan - sets out policy priorities with respect to responding to climate change, are using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

B.43 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018) sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.
- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.

Appendix B Review of Relevant Plans, Policies and Programmes

- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local government plays a central in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.

B.44 UK Climate Change Risk Assessment 2017 (2017): sets out six priority areas needing urgent further action over the next five years. These include:

- flooding and coastal change risks to communities, businesses and infrastructure,
- health, well-being and productivity from high temperatures,
- shortages in public water supply, and for agriculture, energy generation and industry with impacts on freshwater ecology,
- natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity,
- domestic and international food production and trade and
- new and emerging pests and diseases and invasive non-native species affecting people, plants and animals

B.45 The Energy Efficiency Strategy (2012) aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

B.46 The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009): sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new

international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

B.47 The UK Renewable Energy Strategy (2009) describes out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies.

B.48 The Flood and Water Management Act 2010 and The Flood and Water Regulations 2019 sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.49 Historic England's Climate Change Strategy, March 2022 describes Historic England's response to the climate crisis. There are three strands that guide the climate change programme:

- Mitigation - Historic England will proactively remove sources of emissions to achieve net zero by 2040.
- Managing risk - We will identify, understand, and respond to threats to heritage from a changing climate. We will share our insights: listening, learning, and collaborating with partners to effect, enable and catalyse change and risk management.
- Adaptation - engage and equip people to take action in support of the places they care about.

Health and well-being

B.50 National Design Guide (2021) sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built

form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

B.51 National Model Design Code 2021 provides detailed guidance on the production of design codes, guides and policies to promote successful design. The guidance note sets out possible contents for a design code, modelled on the ten characteristics of well-designed places set out in the National Design Guide.

B.52 Build Back Better: Our Plan for Health and Social Care (2021) sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

B.53 Covid-19 mental health and wellbeing recovery action plan (2021) - sets out the government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing, to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes, and to support services to meet the need for specialist support.

B.54 The Charter for Social Housing Residents: Social Housing White Paper (2020) sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

B.55 Using the planning system to promote healthy weight environments (2020), Addendum (2021) provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve

healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

B.56 Healthy Lives, Healthy People: Our strategy for public health in England: Sets out how the Government's approach to public health challenges will:

- Protect the population from health threats – led by central Government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

B.57 Fair Society, Healthy Lives (2011) - investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

B.58 Homes England Strategic Plan 2018 to 2023: Sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

B.59 Select Committee on Public Service and Demographic Change report Ready for Ageing? (2013) - warns that society is underprepared for the ageing population. The report states “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

B.60 Public Health England, PHE Strategy 2020-25 - identifies PHE’s priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

B.61 HM Government, Laying the foundations: a housing strategy for England (2011) – aims to provide support to the delivery of new homes and to improve social mobility.

B.62 Planning for the Future White Paper (2020) - Sets out a series of potential reforms to the English planning system, to deliver growth faster. The White Paper focuses on the following:

- Simplifying the role of Local Plans and the process of producing them.
- Digitising plan-making and development management processes.
- Focus on design, sustainability and infrastructure delivery.
- Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.

B.63 Planning Policy for Traveller Sites (2015) sets out the Government’s planning policy for traveller sites. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the

traditional and nomadic way of life of travellers while respecting the interests of the settled community.

B.64 The health of Gypsies and Travellers in the UK (2008) - Communities and Local Government and the Race Equality Foundation prepared a foundation briefing paper on the health of Gypsies and Travellers. It found that:

- The health status of Gypsies and Travellers is much poorer than that of the general population.
- Poor access to, and uptake of, health services is a major factor in Gypsy and Traveller health.
- Gypsy and Traveller health receives scant attention in policy documents on health inequalities.

Environment (biodiversity/geodiversity, landscape and soils)

B.65 Environment (biodiversity/geodiversity, landscape and soils)The **Environment Act 2021** - sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation of the natural environment of the land or its natural resources, or to conserve the place or setting of the land for its 'archaeological, architectural, artistic, cultural or historic interest.'

B.66 Defra, Biodiversity offsetting in England Green Paper (2013) - sets out a framework for biodiversity offsetting. Offsets are conservation activities designed to compensate for residual losses.

B.67 Defra, Safeguarding our Soils – A Strategy for England (2009) - Sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing

soil pollution; effective soil protection during construction and; dealing with contaminated land.

B.68 Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

B.69 England Biodiversity Strategy Climate Change Adaptation Principles (2008): sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these.

Historic environment

B.70 The Heritage Alliance, Heritage 2020 – sets out the historic environment sector's plan for its priorities between 2015 and 2020.

B.71 Historic England, Corporate Plan 2018-2021 - contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes priorities to demonstrate how Historic England will continue to work towards delivering the heritage sector's priorities for the historic environment.

B.72 Historic England, Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 (2016) - sets out Historic England's guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment processes.

B.73 Historic England Advice Note 1: Conservation Area Appraisal

Designation and Management (second edition) 2019 supports the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management. This 2nd edition updates the advice in light of the publication of the 2018 National Planning Policy Framework and gives more information on the relationship with local and neighbourhood plans and policies.

B.74 Historic England Advice Note 12: Statements of Heritage

Significance: Analysing Significance in Heritage Assets 2019 covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets. Understanding the significance of heritage assets, in advance of developing proposals for their buildings and sites, enables owners and applicants to receive effective, consistent and timely decisions.

B.75 Historic England Good Practice Advice Note 3: The Setting of Heritage Assets (second edition) 2017

sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. T

B.76 Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans 2015

- The identification of potential sites for development within a Local Plan is an important step in establishing where change and growth will happen across local authority areas, as well as the type of development and when it should occur. This document is intended to offer advice to all those involved in the process, to help ensure that the historic environment plays a positive role in allocating sites for development.

B.77 Historic England Good Practice Advice in Planning 1: The Historic Environment in Local Plans 2015 - The purpose of this Good Practice Advice note is to provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG). This document sets out information to help local planning authorities make well informed and effective local plans.

B.78 Historic England; Conservation Principles, Policies and Guidance 2008 is intended mainly to guide Historic England staff on best practice. We hope that, like all of our guidance, the principles will also be read and used by local authorities, property owners, developers and professional advisers. 'Conservation Principles, Policies and Guidance' sets out six high-level principles:

- The historic environment is a shared resource
- Everyone should be able to participate in sustaining the historic environment
- Understanding the significance of places is vital
- Significant places should be managed to sustain their values
- Decisions about change must be reasonable, transparent and consistent
- Documenting and learning from decisions is essential

B.79 Planning (Listed Buildings and Conservation Areas) Act 1990 is a UK Act of Parliament introduced in 1990 that changed laws relating to the granting of planning permission for building works, with a particular focus on listed buildings and conservation areas. It created special controls for the demolition, alteration or extension of buildings, objects or structures of particular architectural or historic interest, as well as conservation areas.

B.80 Ancient Monuments and Archaeological Areas Act 1979 - An Act to consolidate and amend the law relating to ancient monuments; to make provision for the investigation, preservation and recording of matters of

archaeological or historical interest and (in connection therewith) for the regulation of operations or activities affecting such matters; to provide for the recovery of grants under section 10 of the Town and Country Planning (Amendment) Act 1972 or under section 4 of the Historic Buildings and Ancient Monuments Act 1953 in certain circumstances; and to provide for grants by the Secretary of State to the Architectural Heritage Fund.

Water and air

B.81 Environment Agency, Managing Water Abstraction (2016) - is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

B.82 Defra, Water White Paper (2012): Sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

B.83 Defra, Clean Air Strategy (2019) - sets out the comprehensive action that is required from across all parts of government and society to meet goals relating to ensuring cleaner air. This is to be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.84 Our Waste, Our Resources: A strategy for England (2018) - aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

B.85 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations

(2017) provides the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULESvs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.86 The Waste (Circular Economy) (Amendment) Regulations (2020) -

amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

B.87 The Water Supply (Water Quality) Regulations focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

B.88 The Road to Zero (2018) sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.89 Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018) - sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The gov.uk website notes that the 25 Year Plan sits alongside two other important government strategies: the Industrial Strategy and Clean Growth Strategy (the former summarised in the Economic growth section below, the latter under Climate Change above).

B.90 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

B.91 The Air Quality Standards Regulations set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM₁₀ and PM_{2.5}) and nitrogen dioxide (NO₂). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

Economic growth

B.92 National Infrastructure Delivery Plan 2016-2021 (2016) - sets out the government's plans for economic infrastructure over a five-year period with those to support delivery of housing and social infrastructure.

B.93 UK Industrial Strategy: Building a Britain fit for the future (2018) lays down a vision and foundations for a transformed economy. Areas including

artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four ‘Grand Challenges’ of the future.

B.94 HM Government, Industrial Strategy: building a Britain fit for the future (2017) – sets out a long-term policy framework for how Britain will be built to be fit for the future in terms of creating successful, competitive and open economy. It is shaped around five ‘foundations of productivity’ – the essential attributes of every successful economy: Ideas (the world’s most innovative economy); People (good jobs and greater earning power for all; Infrastructure (a major upgrade to the UK’s infrastructure); Business Environment (the best place to start and grow a business); Places (prosperous communities across the UK).

B.95 LEP Network, LEP Network Response to the Industrial Strategy Green Paper Consultation (2017) – seeks to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government’s strategy. Consultation responses set out how the 38 Local Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

B.96 Build Back Better: Our Plan for Growth (2021) - Sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

B.97 The White Paper Levelling Up the United Kingdom (2022) sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to economy and employment state that by 2030:

- Pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.
- The number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this

will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas.

- Domestic public investment in Research & Development outside the Greater South East will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.
- Every part of England that wants one will have a devolution deal with powers at or approaching the highest level of devolution and a simplified, long-term funding settlement.

B.98 Agricultural Transition Plan 2021 to 2024 aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

Transport

B.99 Decarbonising Transport: A Better, Greener Britain (2021) commits to decarbonising all forms of transport to deliver net zero by 2050. Transport is the largest contributor to UK domestic greenhouse gas (GHG) emissions, responsible for 27% in 2019. The strategy has three strategic policies to achieve net zero transport:

- Accelerating modal shift to public and active transport
- Decarbonising road transport
- Decarbonising how we get our goods

B.100 Transport Investment Strategy (2017): Sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

B.101 Highways England Sustainable Development Strategy and Action Plan (2017): This strategy is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

B.102 The Environmental Noise Regulations apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

Sub-national plans and programmes of most relevance for the DPD

B.103 Stratford-on-Avon District Gypsy and Traveller Accommodation Assessment Update Study (2019) was undertaken to inform the emerging Gypsy and Traveller Plan. The assessment identified a need up to 2035 for between 59-70 additional permanent pitches for Gypsies and Travellers (depending on the definition used), plus six additional Travelling Showpeople plots. The council would firstly meet the need of 59 (28 within the first five years) as its obligation, but accept the need of a further 11 (8 within the first five years) as potential need in the area, if further applications are brought forward through windfall. The assessment recommends that this need is met within the District in two ways:

- The intensification and / or extension of existing sites; and
- The provision of new permanent sites

Policy CS.21 (Gypsy and Travellers and Travelling Showpeople) within Stratford-upon-Avon District Council Core Strategy 2011-2031 supports proposals for the provision of permanent, temporary and transit Gypsy and Traveller pitches and Travelling Showpeople plots and sets out the criteria that will be used to assess such proposals.

B.104 West Northamptonshire Traveller's Accommodation Needs Study (2017) - The West Northamptonshire Joint Planning Unit (JPU) was a partnership of Daventry District Council, South Northamptonshire Council, Northampton Borough Council and Northamptonshire County Council - now incorporated into the unitary West Northamptonshire Council. Of relevance to the DPD is the Traveller's Accommodation Needs identified in the West Northamptonshire Study for Daventry District, which adjoined Rugby Borough and is now part of the unitary West Northamptonshire Council. There were no Gypsy or Traveller households identified in Daventry District that meet the planning definition, 24 unknown households that may meet the planning definition and 2 households that do not meet the planning definition. Given that no households in Daventry meet the planning definition, there is no need for any

additional pitches. Need of up to 7 additional pitches for unknown households is made up of new household formation of 6 from a maximum of 24 households. Need for 1 additional pitch for the household that does not meet the planning definition is made up of 1 unauthorised pitch. There is no other current or future accommodation need associated with this household. Policy HO9 (Gypsies, Travellers and Travelling Showpeople) within the Daventry Part 2 Local Plan 2011-2029 sets out criteria for which any provision to be made between 2016 to 2029 will be assessed against.

B.105 Leicester City and Leicestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017) covers Harborough District Council and Blaby District Council. Between 2016 to 2036, the GTAA identified a need for three additional pitches within Blaby District. Upto 23 additional pitches are needed for unknown households which is made up of new household formation of up to 29 from a maximum of 83 households. Within Harborough District, six additional pitches were identified as required between 2016 to 2036. There is a need for upto 18 additional pitches for unknown households which is made up of new household formation from a maximum of 52 households. Policy H6 (Gypsy, Traveller and Travelling Showpeople Accommodation) of the Harborough Local Plan 2011-2031 sets out the requirements for sites and allocates a number of sites to meet the need. Those requirements are set out within Policy CS9 (Accommodation for Gypsies and Travellers) of the Blaby District Local Plan Core Strategy 2013. Blaby District Local Plan 2013 sets out the minimum provision that will be made for Gypsies and Travellers between 2012 to 2029 and the criteria that any planning application will be assed against within Policy CS9 (Accommodation for Gypsies and Travellers).

B.106 Hinckley and Bosworth Gypsy and Traveller Accommodation Assessment (2016) has indicated there is a need for an additional 42 residential pitches (26 up to 2011, 16 from 2011- 2016), capacity for up to 10 transit caravans that equates to 5 transit pitches (to 2011), and up to three show people family pitches (two up to 2011, one from 2011- 2016). It also suggested that 25% of new pitch provision should be socially rented. This is supported through Policy 18 (Provision of Sites for Gypsies, Travellers and Travelling Showpeople) of the Hinckley and Bosworth Core Strategy 2009. The Hinckley

and Bosworth Core Strategy 2009 Policy 18 (Provision for Gypsies, Travellers and Travelling Showpeople) sets out the pitches allocation for the plan period and planning application assessment criteria. Hinckley and Bosworth have recently consulted on their Local Plan Regulation 19 covering 2020 to 2039.

B.107 Nuneaton and Bedworth Borough Gypsy and Traveller and

Travelling Showperson Accommodation Assessment 2021 Update that with the current occupied and vacant pitches within the borough there is a need for 16 additional residential and no transit pitches to meet the needs of those who meet the definition of travellers between 2021/22 to 2036/37; this increases by four to a total of 20 additional residential pitches to meet a cultural need (that is, people who do not meet the definition of a traveller but nevertheless live on pitches). For travellers, this is change of 23 residential pitches and 5 transit pitches from those figures published in the Borough Plan (both decreasing). Policy H3 (Gypsies and Travellers) within the Nuneaton & Bedworth Borough Council Borough Plan 2011-2031 sets out criteria for identify suitable sites.

B.108 Coventry Gypsy and Traveller Accommodation Assessment (2015)

identified two Gypsy and Traveller sites in Coventry. The first at Siskin Drive is owned by the Council, but requires regeneration. Only 4 pitches are currently occupied on the site, despite its existing capacity of 22. The second site is situated at Burbages Lane and is privately owned with all 14 pitches fully occupied. The study identified a need for 34 permanent pitches across Coventry over the next 5 years, however five of these pitches related to needs originating from existing families living in bricks and mortar accommodation. Based on the amendments to national guidance there is uncertainty as to whether it remains justified to plan for these specific provisions. As such, this would mean Coventry requires a total of 29 permanent pitches over the next 5 years. To meet this need the study identifies a total supply of 30 permanent pitches across the 2 existing sites. In addition to permanent pitches the updated needs assessment identifies a need for at least six temporary or transit pitches to avoid nuisance caused by uncontrolled encampments in unsuitable areas. This is supported through Policy H7 (Gypsy and Traveller Accommodation) within the Coventry City Council Local Plan (2017).

B.109 Lichfield District Council, North Warwickshire Borough Council and Tamworth Borough Council Gypsy and Traveller Accommodation Assessment (2019). There were 14 Gypsy or Traveller households identified in North Warwickshire that met the planning definition, 12 undetermined households that may meet the planning definition and 11 households that did not meet the planning definition. The GTAA identifies a net need for 28 pitches up to 2040 for households that met the planning definition. There are six pitches on private family sites with planning permission that have not been implemented, these pitches have not been included. However, they can be used to meet the identified needs of the households living on these sites. The effect of this would be to reduce overall need for households that met the planning definition from 28 pitches to 22 pitches. The GTAA identifies a potential need of up to five pitches up to 2040 for undetermined households. Whilst there is no longer a requirement to include them in a GTAA there is a need for 11 pitches up to 2040 for households that did not meet the planning definition. The GTAA is supported by Policy LP10 (Gypsy & Travellers Sites) within the North Warwickshire Local Plan 2021.

Surrounding Plans

B.110 Warwick District Council Local Plan Sites for Gypsies and Travellers (2013) allocated sustainable and affordable sites to meet the permanent residential needs of this District's Gypsy and Traveller Community and Travelling Show People through the Local Plan process. A total of 20 site options and areas of search were identified. In September 2015 Warwick District Council sought advice from the Sustainable Housing & Urban Studies Unit (SHUSU) at the University of Salford on updating projected household formation rates from the GTAA produced in November 2012. Using a 2% household growth rate, a total of 31 pitches would be required between 2021-2031.

B.111 Stratford-on-Avon Gypsy and Traveller and Travelling Showpeople Supplementary Planning Document (2021) - On 18th October 2021, the Council adopted the Gypsy and Traveller and Travelling Showpeople SPD. The SPD accompanies the Core Strategy and provides detailed advice and

guidance to applicants when submitting planning applications relating to Gypsy and Traveller and Travelling Showpeople accommodation. The Council ran a 'call for sites' which ended on the 1st March 2021. Any sites submitted will be assessed and used to inform the preparation of the review of the Council's Core Strategy.

B.112 Harborough Gypsy, Traveller and Travelling Showpeople Site

Identification Study Report (2017) sought to identify sites required to meet the potential accommodation needs as identified in the GTAA. Within Harborough District there are currently nine Gypsy and Traveller sites of varying size. There are five occupied Travelling Showpeople's sites with a total of 63 plots. A total of 52 sites were assessed as part 1 of the study with four sites identified as potentially available and suitable.

B.113 Nuneaton and Bedworth Borough Gypsy and Traveller Site

Allocations DPD (2022) sets out a plan to provide sufficient pitches for the needs of the travelling community; to provide provision in sustainable locations with good access to local services; and to provide provision in such a way that the local environment is protected and, where appropriate, enhanced. The Council ran a call for sites between 17th September 2021 and 22nd October 2021. No sites were put forward. Therefore, three sites assessed independently for the Council remain the only sites for consideration. The three sites assessed have been allocated to provide at least 14 residential pitches. Also, the existing travelling Showpeople site in Nuneaton has been safeguarded from alternative uses.

B.114 North Warwickshire Update on Gypsies and Travellers needs and 5

year site/pitch supply 2021 sets out the identified needs, the five year supply of deliverable gypsy and traveller sites in North Warwickshire Borough for the period of 1st April 2018 – 31st March 2023 and also provides information on the current site and pitch availability and supply in the Borough as at 1st January 2019. The report concluded that the current supply of both residential and transit pitches over the period assessed for the 2013 GTAA, up to 2028, is more than adequate to address the needs identified in the GTAA. In addition, if current per annum pitch needs are projected forward up to 2033, it can be seen

Appendix B Review of Relevant Plans, Policies and Programmes

that the current supply of pitches, completed and with consent, is sufficient to address that extended need/requirement.

B.115

Appendix C

Baseline Information

Climate Change

C.1 Climate change presents a global risk, with a range of different impacts that are likely to be felt within Rugby Borough. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change. The consequences include predictions of warmer, drier summers and wetter winters with more severe weather events all year as well resulting in higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

C.2 The 2018 Intergovernmental Panel on Climate Change (IPCC) identified a reduced timeframe to act to keep world temperatures rises to 1.5 degrees Celsius before 2050 in line with the Paris Agreement [\[See reference 9\]](#).

C.3 The Tyndall Centre has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for Rugby Borough [\[See reference 10\]](#):

- The Borough should stay within a maximum cumulative carbon dioxide emissions budget of 6.5 million tonnes (MtCO₂) for the period of 2020 to 2100. It should be noted at 2017 CO₂ emission levels, Rugby Borough would use this entire budget within 7 years from 2020;
- The Borough should initiate an immediate programme of CO₂ mitigation to deliver cuts in emissions averaging a minimum of -12.1% per year to deliver a Paris aligned carbon budget; and,
- The Borough should reach zero or near zero carbon no later than 2044.

C.4 In light of the IPCC work, Rugby Borough declared a Climate Emergency in July 2019. The declaration commits Rugby Borough to be carbon neutral by 2030 [\[See reference 11\]](#).

Carbon Dioxide Emissions

C.5 The Government regularly publishes Local Authority and regional carbon dioxide emissions national statistics. Emissions for Rugby Borough have fallen between 2005-2019 from 23.7t per capita to 16.4t per capita. Per capita emissions in the plan area within the scope of influence of the local authorities fell most years between 2005 and 2019 as shown in Table 3.1. It should be noted the figures in Table C.1 do not account for Land Use, Land Use Change and Forestry (LULUCF) figures in Rugby Borough. In 2019, LULUCF accounted for the removal of 5.8Kt carbon dioxide from the atmosphere in Rugby Borough [\[See reference 12\]](#).

Table C.1: Carbon dioxide emissions estimates in Rugby Borough 2005-2019

Year	Total Emissions (kt CO ₂)	Per Capita Emissions (t)
2005	2,167.3	23.7
2006	2,225.5	23.9
2007	2,454.2	25.9
2008	2,219.1	23.0
2009	2,087.6	21.4
2010	2,100.5	21.2
2011	2,088.2	20.8
2012	1,931.1	19.1
2013	1,955.1	19.2

Year	Total Emissions (kt CO ₂)	Per Capita Emissions (t)
2014	1,979.3	19.2
2015	1,839.5	17.6
2016	1,956.0	18.6
2017	1,814.9	17.1
2018	1,862.2	17.4
2019	1,791.0	16.4

C.6 Domestic and commercial between 2005 and 2019 saw the greatest drop in carbon dioxide emissions. Within Rugby Borough, industry remained the main contributor of the highest level of emissions mainly related to large industrial installations.

Table C.2: Changes in carbon dioxide emissions by sector for Rugby Borough between 2005 and 2019

Source of Emissions	2005	2019
Industry (kt)	1,273.8	1,093.9
Commercial (kt)	130.3	83.6
Public Sector (kt)	39.0	19.1
Domestic (kt)	240.7	157.4
Transport (kt)	481.4	442.9
Grand Total (kt)	2,167.3	1,791.0

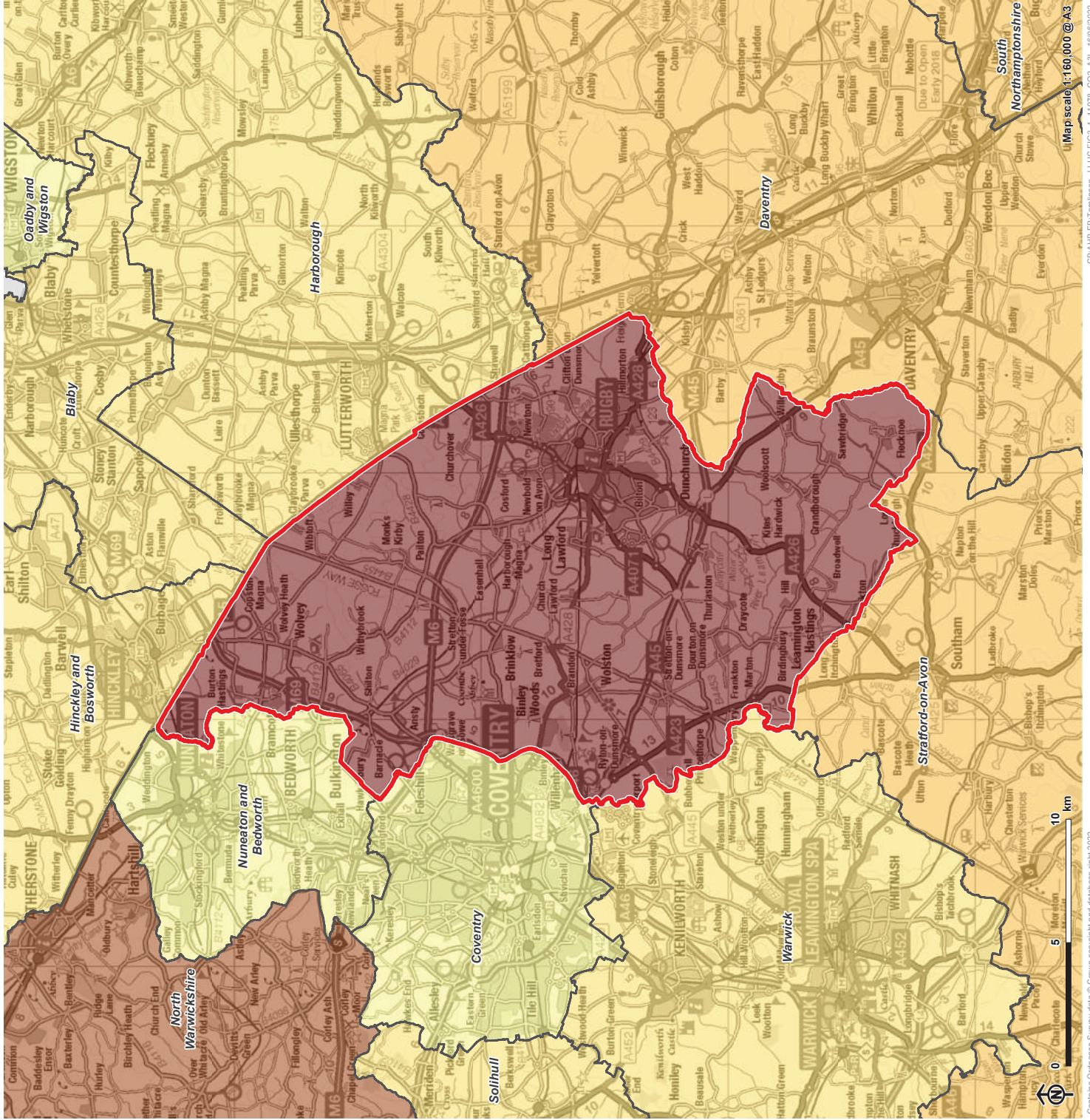
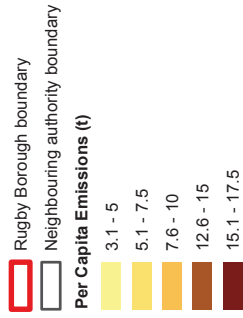
C.7 In 2020 transport was still the largest source of carbon dioxide in the UK, accounting for 29% of total emissions. The majority of emissions from transport in the UK are from road transport. Transport emissions include freight and passenger transport, both for private and business purposes. In the UK,

transport CO₂ emissions saw a decrease of 24.3% in 2020 compared to 2019. However, the drop is in part due to travel restrictions as a result of the Covid-19 pandemic [\[See reference 13\]](#).

C.8 The national target is for 60% of all new cars and vans to be electric by 2030. Within Rugby Borough, there are a total of 58 public electric vehicle charging devices, of which 27 are rapid charging devices. There are approximately 52.4 public charging devices per 100,000 people in Rugby Borough. Rugby Borough performs better than the UK average of 42.3 public charging devices per 100,000 population [\[See reference 14\]](#).

C.9 Rugby Borough Council will consult on a draft Climate Change Strategy. The strategy will address the Council's commitment of moving toward net zero by 2030, along with the broader measures which will be needed to take to move towards a more sustainable Borough, relying on collaborative working with partners, businesses, voluntary groups, parish councils and residents. The strategy is being developed following analysis of the Council's current carbon footprint, analysis of responses received to its current residents survey and through matters identified at the Rugby Climate Summit. Rugby Borough Council held its first ever summit on addressing climate change on the 18th September 2021.

Figure C.1: Capital CO2 emissions compared to neighbouring authorities



Overall Energy Consumption

C.10 The Department for Business, Energy and Industrial Strategy produced the following consumption figures for Rugby Borough in 2019 [\[See reference 15\]](#):

- All fuels – a total of 428.6Ktoe across domestic, transport and industrial and commercial use
- Coal - a total of 52.8Ktoe predominantly through industrial and commercial use.
- Manufactured fuels - a total of 0.4Ktoe through domestic and industrial and commercial use.
- Petroleum - a total of 151.1Ktoe predominantly from road transport.
- Gas - a total of 91.8Ktoe predominantly through domestic use.
- Electricity - a total of 55.0Ktoe through domestic and industrial and commercial use.
- Bioenergy and wastes - a total of 77.5Ktoe predominantly through industrial and commercial use.

C.11 The changes in consumption by energy type for Rugby Borough are shown in Table C.3. With the exception of energy from biomass and wastes, the consumption of all energy types fell between 2005 and 2019. The use of bioenergy and wastes has seen a dramatic increase between 2005 and 2019.

Table C.3: Energy Consumption in Rugby Borough by type

Energy Type	Energy Consumption in Ktoe (2005)	Energy Consumption in Ktoe (2019)
Coal	117.6	52.8

Energy Type	Energy Consumption in Ktoe (2005)	Energy Consumption in Ktoe (2019)
Manufactured Fuels	0.8	0.4
Petroleum	157.8	151.1
Gas	92.1	91.8
Electricity	60.2	55.0
Bioenergy and Wastes	4.1	77.5
Total	432.6	428.6

Population, Health and Wellbeing

Population

C.12 Rugby Borough lies within Warwickshire and covers an area of 351.2 km². The only town within the Borough is Rugby, with the remainder of the Borough comprising smaller villages and rural areas.

C.13 The latest population estimate for Rugby, the 2020 population, was 110,650 people of which 55,073 were male and 55,577 were female. The population projections for Rugby predict that the population will increase to 126,536 by 2043 [\[See reference 16\]](#). The 2011 Census estimated that 160 of the population of Rugby Borough identified as Gypsies or Irish Travellers (0.2%) [\[See reference 17\]](#). For the first time, the 2011 Census recorded data on the Gypsy or Irish Traveller ethnic group. Data was not gathered for people who identified as ‘Roma’ or ‘Travelling Showpeople’, as they are a distinct group with different needs to Gypsies or Irish Travellers. There are some limitations to the 2011 Census data in that some Gypsies and Irish Travellers will not have disclosed their ethnicity and some may have been in transit on Census day. It is also noted that the survey undertaken to inform the 2017 GTAA recorded 384 Gypsies and Travellers living on authorised and unauthorised developments and encampments, which is significantly higher than the 2011 Census figures

which suggest there are only 160 Gypsies and Travellers living in the study area.

C.14 Notwithstanding these limitations, the SA will utilise the Census 2011 data and, with regards to other ethnic groups such as Travelling Showpeople and Romany, this report will refer to other available local data sources such as the GTAA. Population data from the 2021 Census will be taken into account if it becomes available later in the SA process.

C.15 Table C.4 shows the population and gender of the Gypsy and Irish Traveller ethnic group compared to the entire population of Rugby, as recorded in the 2011 Census [\[See reference 18\]](#).

Table D.4: Gypsy or Irish Traveller population by gender

Ethnic Group	All Persons	Males	Females
All Categories: Ethnic Groups	100,075	49,884	50,191
Gypsy or Irish Travellers	160	72	88

C.16 Table C.5 shows the age structure of the Gypsy and Irish Traveller ethnic group compared to the entire population of Rugby, as recorded in the 2011 Census.

Table D.5: Age Structure of Gypsy or Irish Traveller in Rugby Borough

Age	All Ethnic Groups	% of Population	Gypsy or Irish Traveller	% of Population
0-14	18,066	18.1%	62	38.8%

Age	All Ethnic Groups	% of Population	Gypsy or Irish Traveller	% of Population
15-19	6,174	6.2%	17	10.6%
20-24	5,182	5.2%	17	10.6%
25-34	12,641	12.6%	13	8.1%
35-44	14,568	14.6%	29	18.3%
45-59	20,048	20.0%	12	7.5%
60-74	15,466	15.5%	7	4.4%
Age 75 and over	5,556	5.6%	3	1.9%
Total	100,075		160	

C.17 It is evident from the table above that the highest percentage of Gypsies or Irish Travellers falls within the 0–14 years age-bracket at 38.8%. This has implications when planning for the Gypsy and Traveller population as younger populations are likely to continue to grow. It will also have implications for the provision of healthcare and school places. The Gypsy and Traveller population within Rugby also has a high percentage of people at working age. The total population of Rugby Borough is ageing, unlike the Gypsy and Traveller group specifically which has a lower percentage of people aged 60+ years.

C.18 In 2011 there were 62 dependent children in Rugby Borough that identified as Gypsy or Irish Travellers with the predominant age group being between 0-4 years (16 children) [\[See reference 19\]](#). In 2011, 45% of Gypsy and Irish Travellers in 2011 had dependent children. This is above the average for England and Wales as a whole (29%) [\[See reference 20\]](#).

Accommodation

C.19 No new Gypsy and Traveller pitches were approved during the 2020-2021 monitoring period [\[See reference 21\]](#).

C.20 Rugby Borough Council is required to provide the Department for Levelling up, Housing and Communities with a bi-annual statistical count of Traveller caravans on both authorised and unauthorised sites within the Borough. The count takes place every January and July. The most recent count in July 2021 identified that there are 183 caravans on authorised permanent sites, with two caravans on authorised temporary sites. Twenty four caravans were on unauthorised tolerated sites, adding to a total of 209 caravans [\[See reference 22\]](#). The majority of unauthorised encampments between April 2017 and September 2021 have been in Rugby town (76%).

C.21 The requirements identified in the 2017 GTAA are as follows:

Table D.6: Number of pitches required

Phase	Timeframe	Total Pitches (minimum)
1	2017 to 2022	35
2	2022 to 2027	12
3	2027 to 2032	14
4	2032 to 2037	15
	Total	76

C.22 At the time when the 2017 GTAA was prepared, there were 20 sites in Rugby Borough with full planning permission, accommodating a total of 101 permanent residential pitches. Nineteen sites were private and one site was owned by Rugby Borough Council. Seventeen of these pitches were occupied by non-Gypsy and Traveller households. Table C.7 below provides information about the permanent residential pitches as of 2017 within Rugby Borough.

Table C.7: Permanent Residential Pitches in Rugby Borough (2017)

Type of Site	Number of Pitches
Authorised with permanent planning permission, occupied	73
Authorised with permanent planning permission, vacant	3
Authorised with permanent planning permission, potential	8
Authorised with planning permission, occupied by non Gypsy and Traveller households	17
Total permanent residential pitches with planning permission	101

C.23 In addition, at the time when the 2017 GTAA was published, there were two private sites in Rugby Borough with temporary planning permission accommodating six residential pitches. There were a further three unauthorised sites without planning permission, accommodating a total of 16 pitches.

C.24 Between 1st April 2017 and 31st October 2021, planning permission was granted for 24 permanent residential pitches and one temporary residential pitch. The 2017 GTAA includes a total of four pitches at two sites in the authorised permanent sites which were granted planning permission after 1st April 2017. However, these two sites should not be counted as permissions since 1 April 2017, as they had already been counted in the baseline in the 2017 GTAA.

C.25 This means that 20 permanent residential pitches that have been granted planning permission since 1st April 2017 can be counted as contributing to the 61 permanent residential pitches required between 2017/18 and 2031/32.

C.26 Therefore, the remaining requirement for permanent residential pitches as at 1st November 2021 is 41 pitches. The GTAA is currently being updated via survey work to gather updated baseline numbers and this will inform future stages of the DPD and the SA.

C.27 Table C.8 outlines the Census 2011 data on ethnic group by accommodation type which shows that 'Flat, maisonette or apartment, or mobile/temporary accommodation' was the most common type of accommodation (65.6%) for respondents within Rugby Borough who identified as Gypsy or Irish Traveller [\[See reference 23\]](#).

Table C.8: Accommodation type by Ethnic Group

Accommodation Type	All Ethnic Groups	% of Population	Gypsy or Irish Traveller	% of Population
Flat, maisonette or apartment, or mobile/temporary accommodation	8,227	8.4%	101	65.6%
Whole house or bungalow: Total	89,953	91.6%	53	34.4%
Whole house or bungalow: Detached	30,871	31.4%	35	22.7%
Whole house or bungalow: Semi-detached	34,260	34.9%	11	7.1%
Whole house or bungalow: Terraced (including end-terrace)	24,822	25.3%	7	4.5%
All Categories	98,180	100%	154	100%

C.28 Table C.9 outlines the Census 2011 data on tenure by ethnic group. In Rugby Borough, 22 (51.1%) respondents who identified as Gypsies or Irish Travellers lived in accommodation that was ‘owned or share owned’. This is a lower proportion when compared to all ethnic groups in Rugby Borough (70.4%). The Gypsy or Irish Traveller ethnic group had one of the highest proportions of people living in ‘social rented accommodation’ (11 respondents) with nine of the respondents renting from Rugby Borough Council. This is a higher proportion when compared to all other ethnic groups in Rugby Borough, of which 14.3% are in socially rented accommodation, with 3,860 renting from Rugby Borough Council [\[See reference 24\]](#).

Table C.9: Tenure by Ethnic Group

Tenure	All Ethnic Groups	% of Population	Gypsy or Irish Traveller	% of Population
Owned or shared ownership: Total	29,489	70.4%	22	51.2%
Owned outright	13,772	32.9%	16	37.2%
Owned with a mortgage or loan or shared ownership	15,717	37.5%	6	14.0%
Social rented: Total	5,993	14.3%	11	25.6%
Rented from council (Local Authority)	3,860	9.2%	9	20.9%
Other social rented	2,133	5.1%	2	4.7%
Private rented or living rent free: Total	6,393	15.3%	10	2.3%
Private landlord or letting agency	5,281	12.6%	8	18.6%
Other private rented or living rent free	1,112	2.7%	2	4.7%

Tenure	All Ethnic Groups	% of Population	Gypsy or Irish Traveller	% of Population
All categories: Tenure	41,875	100%	43	100%

C.29 Reflecting longevity of tenure, over four fifths of respondents (85%) had lived on a site for more than five years. However, three respondents (3%) had lived on site for between 7-12 months, three (3%) for between 1-2 years, and nine (9%) for between 3-5 years.

C.30 Household composition classifies households according to the relationship between the household members. Households may be one or more families or they may consist of one person living alone or unrelated adults sharing. The average size of families living on the survey sites is 4.1 people compared to a 2011 UK average of 2.4 people. Table 3.10 below shows the number of people per household based on figures within the GTAA 2017 (noting that the figures again indicate a higher population of Gypsies and Travellers locally than the 2011 Census figures indicate). There was a fairly even distribution of respondent household sizes although 33% contained only one or two people. However, 42% of households contained five or more people [\[See reference 25\]](#).

Table D.10: Number of people in household

	Number	Percentage
1 person	12	13%
2 people	19	20%
3 people	9	10%
4 people	15	15%
5 people	13	14%
6 people	9	10%

	Number	Percentage
7 people	10	11%
8 people	7	8%
Total	94	100%

Social inclusion and deprivation

C.31 The English Indices of Deprivation 2019 [\[See reference 26\]](#) is a measure of multiple deprivation in small areas or neighbourhoods within England, called Lower-layer Super Output Areas (LSOAs). Deprivation is a multi-faceted and complex problem which influences and is influenced by a number of different factors. Seven domains of deprivation are measured: Income Deprivation; Employment Deprivation; Health Deprivation and Disability; Education, Skills and Training Deprivation; Crime; Barriers to Housing and Services; and Living Environment Deprivation. Each domain contains a number of indicators. The seven domains are combined to give a multiple deprivation score. There are 61 LSOAs in Rugby Borough and 32,844 LSOAs nationally.

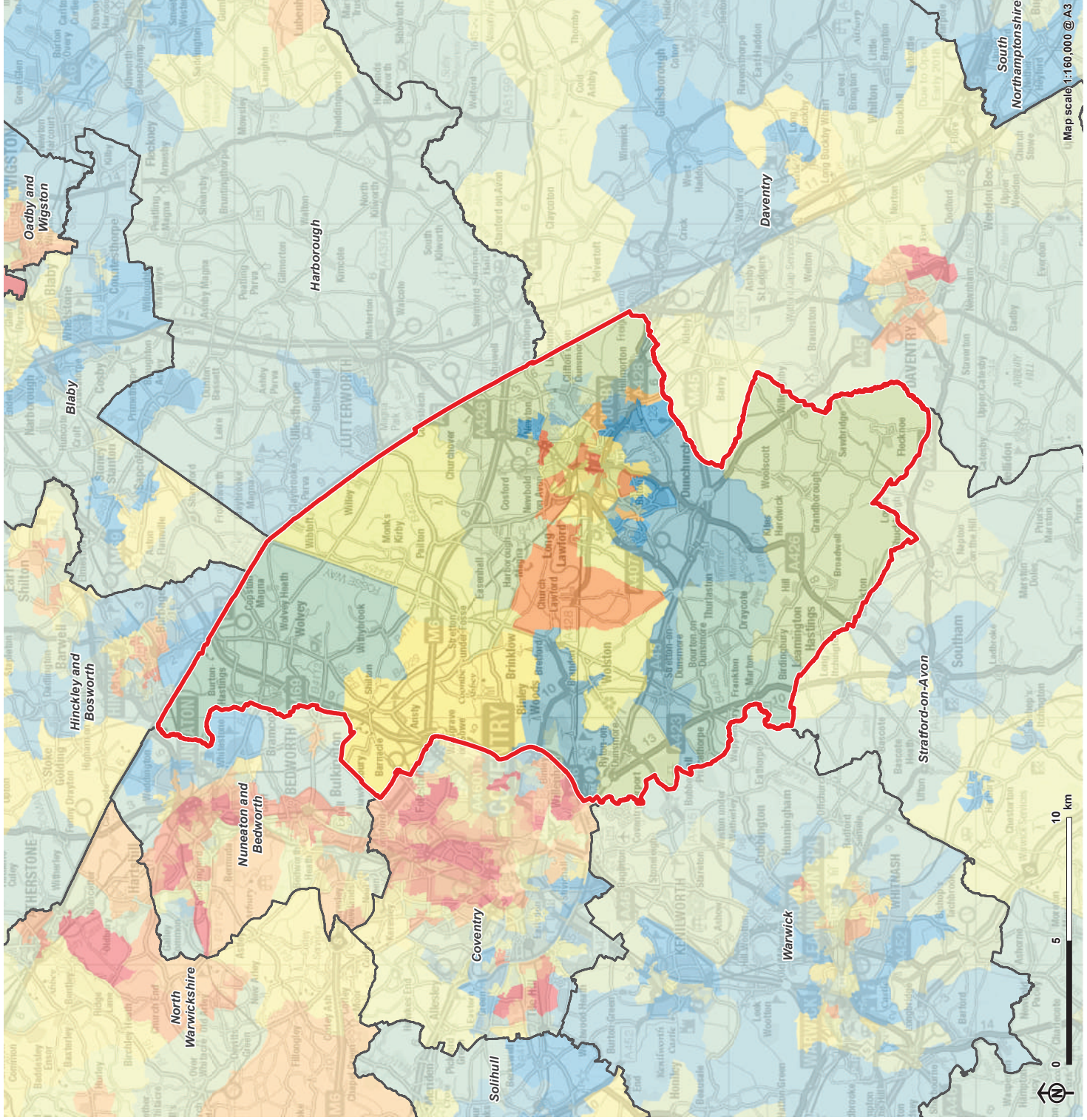
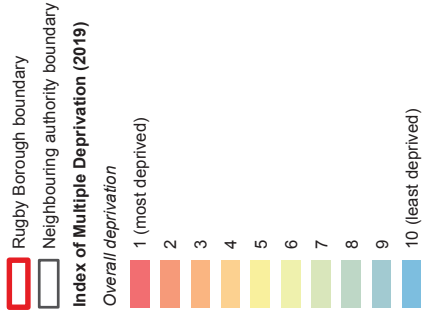
C.32 In 2019, Rugby Borough ranked out 222 of 317 local authorities (1 being the most deprived). Rugby performs particularly well in relation to measures relating to IDAOPI (Income Deprivation Affecting Older People Index), Employment and Educations, Skills & Training. The Borough performs less favourably in relation to Crime (ranked 142 out of 317). It also performed lower than other ranks in relation to Living Environment which considers the quality of housing as well as air quality and road traffic accidents. The majority of the most deprived areas fall around the centre of Rugby town and to the North and West of Rugby Borough [\[See reference 27\]](#). However, there is evidence of disparity between the settled and the Travelling communities. The Traveller Movement report [\[See reference 28\]](#) outlines the results of its research into Gypsy and Travellers' experiences of prejudice, discrimination and social exclusion:

- 4 out of 5 (77%) of Gypsies and Travellers have experienced hate speech or hate crime.

Appendix C Baseline Information

- Half of Gypsies and Travellers have experienced discrimination in the workplace.
- 70% of Gypsies and Travellers said they have experienced prejudice in education.
- 55% of Gypsies and Travellers have been refused services because of their ethnicity

Figure C.2: Indices of Multiple Deprivation



Economy

C.33 The Rugby Borough Local Plan under Policy DS1 requires 208 hectares of employment land to be delivered, including 98 hectares to contribute to Coventry's unmet need. The Coventry unmet need is split between 41ha at Ansty (Ansty Park) and 57 at Ryton-upon Dunsmore (Former Peugeot works) [See reference 29]. There have been strong delivery rates across the Borough's strategic employment sites throughout the current Local Plan period. This past trend indicates the potential for strong delivery at Local Plan allocations to meet the Local Plan employment target. In 2020/21 a total floorspace of 61,198.6 sqm was permitted on 33 hectares. The new employment space consisted of a mix of B1, B2, B8.

C.34 Table C.11 below shows employment development within Rugby Urban Area [See reference 30].

Table D.11: Employment Land Overview (ha)

	Ha	Total	Rugby	Coventry
A	Local Plan Requirement	208	110	98
B	Delivery 2011-2019	151.85	73.25	78.6
C	Delivery in 2020-2021	0.44	0.44	0
D	Delivery to date (B+C)	152.29	73.69	78.6
E	Remaining Requirement (A-D)	55.71	36.31	19.4

C.35 Between 2020 and 2021, 81% (55,000) of Rugby Borough's population was economically active which is higher than the figures for the West Midlands (77.7%) and England (78.5%). A total of 3.7% of Rugby Borough's population are unemployed. In the 2011 Census, 53 (55.8%) of the respondents who identified as Gypsies or Irish Travellers were economically active and 42 (44.2%) were economically inactive. The proportion of Gypsies and Irish Travellers that are economically active is slightly higher than the average across England and Wales which is 46.7%.

C.36 Forty respondents who identified themselves as Gypsies or Irish Travellers were in employment, with a further 13 unemployed. The full breakdown of economic activity is outlined in Table C.12 below.

Table D.12: Economic Activity by Ethnic group

Economic Activity	All Ethnic Groups	% of Population	Gypsy or Irish Travellers in Rugby Borough	% of Population
Economically Active: Total	53,691	66.5%	53	55.8%
In Employment: Total	50,716	62.9%	40	42.1%
Employee: Total	42,650	52.9%	27	28.4%
Part-time	10,178	12.6%	7	7.4%
Full-time	32,472	40.2%	20	21.1%
Self-employed: Total	6,597	8.2%	10	10.5%
Part-time	1,097	1.4%	4	4.2%
Economically Active: Total	53,691	66.5%	53	55.8%
Full-time	4,690	5.8%	6	6.3%

Appendix C Baseline Information

Economic Activity	All Ethnic Groups	% of Population	Gypsy or Irish Travellers in Rugby Borough	% of Population
Full-time Students	1,469	1.8%	3	3.2%
Unemployed: Total	2,975	3.7%	13	13.7%
Unemployed (exc. Full-time students)	2,616	3.2%	12	12.6%
Full-time Students	359	0.4%	1	1.1%
Economically Inactive: Total	26,998	33.5%	42	44.2%
Retired	18,200	22.6%	8	8.4%
Student (inc. full-time students)	2,844	3.5%	5	5.3%
Looking after home or family	2,582	3.2%	16	16.8%
Long-term sick or disabled	2,118	2.6%	8	8.4%
Other	1,254	1.6%	5	5.3%
All Categories: Economic Activity	80,689		95	

C.37 With regards to gender, data from Nomis has identified that at the time of the 2011 Census, 29 male Gypsy and Traveller respondents were economically active and nine were economically inactive. The majority (33) of female Gypsy and Traveller respondents were economically inactive, with 24 being economically active [\[See reference 31\]](#).

C.38 For Gypsies or Irish Travellers who were aged 16 and over and in employment, the largest group worked in 'skilled trade occupations' (11 respondents). The next most common occupations were 'Managers, directors and senior officials' (seven respondents) and 'Elementary occupations' (six

respondents). Further information is set out within Table C.13 below [\[See reference 32\]](#).

Table C.13: Occupation by Ethnic Group

Ethnic Group	All Ethnic Groups	Gypsy or Irish Traveller
Occupation		
All categories: Occupation	50,176	40
1. Managers, directors and senior officials	5,765	7
2. Professional occupations	8,938	3
3. Associate professional and technical occupations	6,116	2
4. Administrative and secretarial occupations	5,646	3
5. Skilled trades occupations	5,361	11
6. Caring, leisure and other service occupations	4,031	3
7. Sales and customer service occupations	3,428	3
8. Process, plant and machine operatives	3,994	2
9. Elementary occupations	7,437	6

C.39 Across all ethnic groups in England and Wales, Gypsies and Irish Travellers had the highest proportion of elementary and skilled workers. Gypsies and Irish Travellers aged 16 and over had the lowest proportion across the ethnic groups for professional occupations [\[See reference 33\]](#).

C.40 According to the 2011 Census, the proportion of Gypsies and Travellers who are unemployed is 13.7% of the population which is significantly higher than the national average (3.8%) [\[See reference 34\]](#).

C.41 Travelling Showpeople are involved in the funfair industry and have traditionally provided entertainment at fairs across the UK for several centuries. Travelling Showpeople are self-employed and transport large amounts of mechanical fairground equipment by road from site to site, over the show season, which can last anything from four to 11 months of the year, only returning to a settled home site in the off-season. There is no data available for the consideration of economic activity of Travelling Showpeople.

Transport

C.42 Rugby Borough is positioned in a central part of England, within close proximity of key parts of the strategic road network. The principal roads that run through the Borough are the M6, A5, M45 and M69, and the A46 forms part of the border between Rugby Borough and Coventry. The M1 and A1 are within close proximity of the eastern boundary of the Borough.

C.43 Rugby is on the national rail network, providing access to London, the Midlands, the North West and Scotland, with connections to Coventry and Nuneaton in the west and Milton Keynes and Northampton in the east. A regular train service runs from Rugby town to Birmingham. The number of trips at Rugby Train station has increased by 39% over the last five years. A new strategic parkway station at Houlton, close to M1 Junction 18, east of Rugby with 260+ car parking spaces has been proposed with an estimated delivery timescale between 2019-2028 [\[See reference 35\]](#).

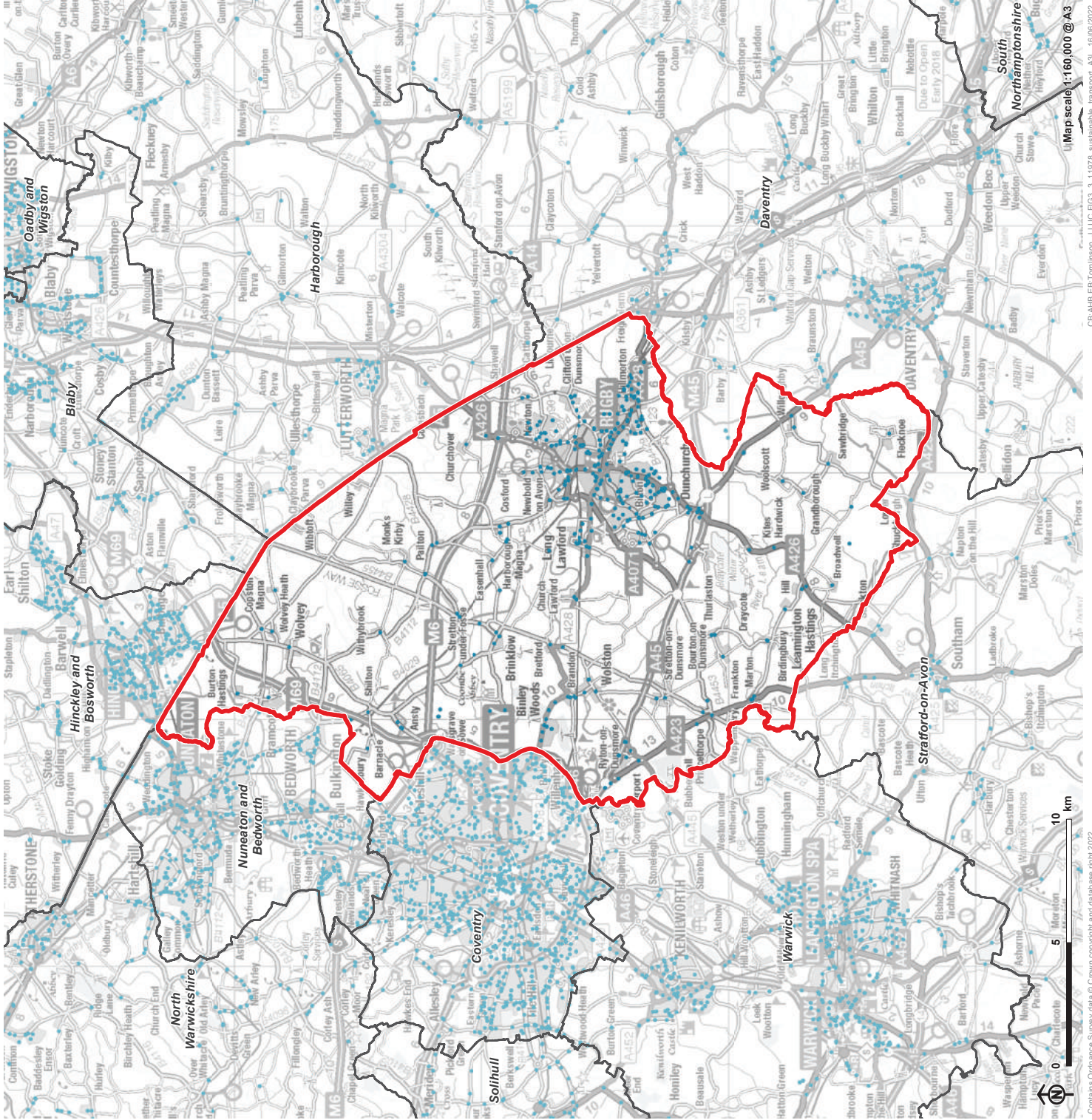
C.44 Approximately four miles from Rugby Town Centre is the Daventry International Rail Freight Terminal, one of the key rail freight interchanges in Europe. Birmingham Airport is approximately 27 miles east of the Borough.

C.45 Key pieces of highway infrastructure are to be delivered as part of the South West Rugby development including the Homestead Link and the Potsford Dam Link. These mitigation measures were identified in the transport modelling work prepared for the Local Plan. The Homestead Link will minimise impacts on the existing highway network and relieve pressure on other areas, in particular the Dunchurch Crossroads. High quality public transport services to the town centre and a comprehensive walking and cycling network to link residential areas with key facilities on site will also be provided. Work is underway, with the County Council to identify the bus services required as well as the new cycling and walking routes and infrastructure.

C.46 The majority of households in Rugby Borough have at least one car or van in their household (87.7%), with 37% of the population having one car in the household, and 50.6% having two or more. The total number of respondents to the 2011 Census that identified as Gypsies or Irish Travellers without a car (15.6%, 24 respondents) is slightly higher than the average for Rugby Borough (12.3%). 66.9% of respondents highlighted that they had one car or van in the household, and 17.5% had two or more cars or vans in the household [\[See reference 36\]](#).

Figure C.3: Sustainable Transport Links

- Rugby Borough boundary
- Neighbouring authority boundary
- Rail station
- Bus stop



Biodiversity

C.47 Rugby Borough contains several national and local designated biodiversity and geodiversity sites [See reference 37]. There are no sites of international importance within Rugby Borough. However, Rugby Borough contains many national and local designations as set out below:

- Seven Sites of Special Scientific Interest (SSSI)
- Four Local Nature Reserves
- 12 Sites of Importance for Nature Conservation (SINCs)
- Two Regionally Important Geological Sites

C.48 All of the SSSIs are located to the West and South West of the Rugby Urban Area. Rugby Borough contains two geological SSSIs, Ryton and Brandon Gravel Pits and Wolston Grave Pit. Rugby Borough contains all or parts of five biological SSSIs: Brandon Marsh, Coombe Pool, Ryton Wood, Draycote Meadows and Stockton Railway Cutting and Quarry. The four Local Nature Reserves within Rugby Boundary are Ashlawn Cutting, Newbold Quarry Park, Swift Valley and Cock Robin Wood. Throughout Rugby Borough the 12 SINCs are Oxford Canal Meadows, Abbotts Farm, Lime Kilns, Osier Meadow, Cawston Spinney, Wolvey Rush Pasture, Manor Farm Meadows, Home Farm Grasslands, Sally's Hole, Brandon Little Wood and Burton Hill Meadows.

C.49 There are no SACs in Rugby Borough. Ensor's Pool, located in Nuneaton and Bedworth Borough and within 10km of the Rugby Borough boundary, has three statutory designations as a Special Area of Conservation (SAC), a Site of Special Scientific Interest (SSSI) and a Local Nature Reserve (LNR). Ensor's Pool is designated as part of the Natura 2000 network because of the presence of the white clawed-crayfish [See reference 38].

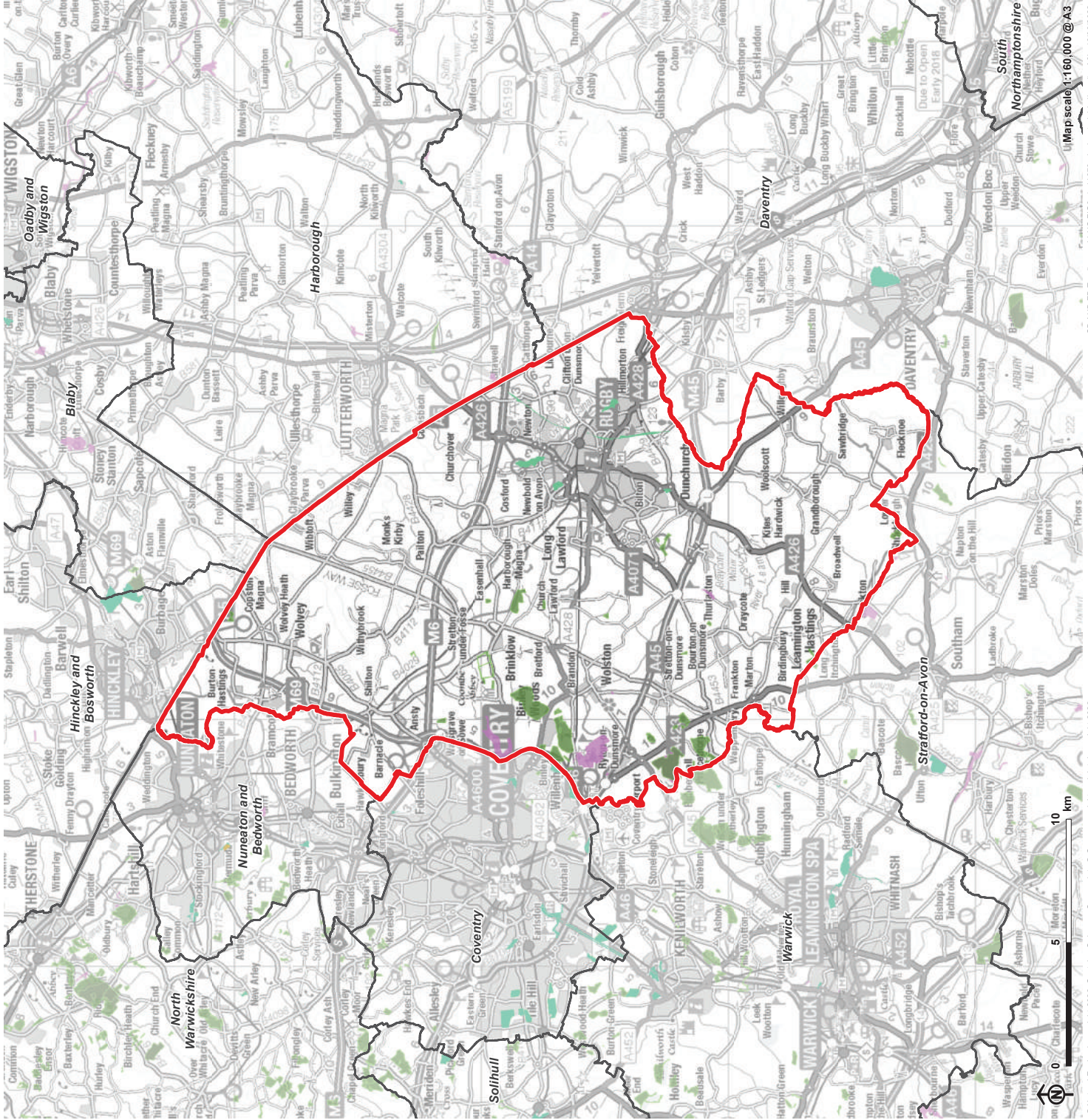
C.50 Rugby Borough contains three broad habitats: woodland, grassland and marsh and open water. There is a large concentration of ancient woodland

Appendix C Baseline Information

located to the west of Rugby Borough. The Oxford Canal in Rugby provides a valued semi-natural habitat for wildlife and its connectivity to the wider canal network and proximity to other areas of Green Infrastructure.

Figure C.4: Designated Biodiversity Assets

- Rugby Borough boundary
- Neighbouring authority boundary
- Site of Special Scientific Interest (SSSI)
- Special Area of Conservation (SAC)
- Ancient woodland
- Local Wildlife Site



Historic Environment

C.51 Within Rugby Borough there are 19 Conservation Areas which are located in a number of the villages throughout the Borough and within the urban area. A Conservation Area covers a larger part of Rugby Town Centre with an additional designation covering the Rugby School grounds and adjoining residential/commercial areas. Beyond the urban area there is a large Conservation Area covering Coombe Abbey Registered Park and Garden and Listed Buildings. The remaining conservation areas are found in the following villages throughout the Borough:

- Brandon
- Brinklow
- Churchover
- Clifton upon Dunsmore
- Dunchurch
- Easenhall
- Leamington Hastings
- Monks Kirby
- Stretton-on-Dunsmore
- Thurlaston
- Wolston

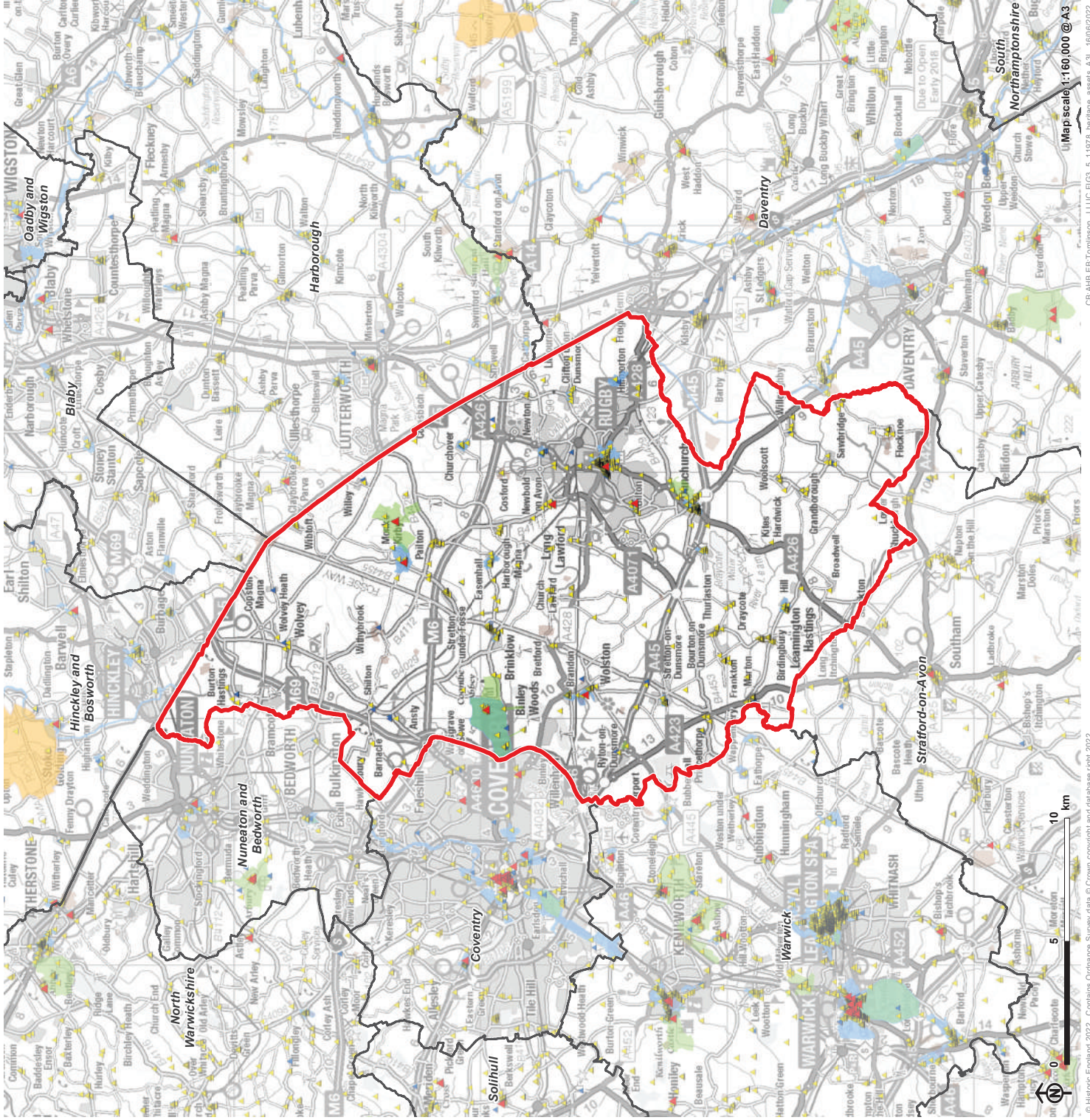
C.52 Character Appraisals have been published for Rugby Borough's 19 conservation areas [\[See reference 39\]](#). Warwickshire County Council carried out the Warwickshire Historic Landscape Characterisation (HLC) project. The project forms part of a national programme of Historic Landscape Characterisation funded and administered by Historic Environment. HLC provides an overview of complex aspects of the historic environment in order to

provide new and wide-ranging information for conservation, management and development decisions. The objective of HLC is to promote better management and understanding of the historic landscape resource [\[See reference 40\]](#).

C.53 There are six Grade I Listed Buildings, 30 Grade II* Listed Buildings and 460 Grade II Listed Buildings in the Borough. In addition, there are 26 Scheduled Monuments and five Registered Gardens at Bilton Grange (Grade II), Coombe Abbey (Grade II*), Ryton House (Grade II), Newnham Paddox (Grade II) and Dunchurch Lodge (Grade II). There are currently nine assets on the Heritage at Risk Register within the Borough [\[See reference 41\]](#). The majority of these assets consist of Scheduled Monuments with one building (Ryton House, Ryton-on-Dunsmore) which is in an unsatisfactory condition.

Figure C.5: Heritage Assets

- Rugby Borough boundary
- Neighbouring authority boundary
- Registered Battlefield
- Scheduled Monument
- Registered Parks and Gardens
- Conservation Area
- Listed building (by grade)**
 - ▲ I
 - ▲ II*
 - ▲ II



Landscape

C.54 The landscape of Rugby Borough is a gently undulating lowland of hills and vales traversed by the rivers of the Avon and Leam. A plateau rises to the north and ironstone fringe hills lie to the south east. Outside the urban area of Rugby town the area is a generally well-settled rural landscape with major roads running through it, with associated large-scale commercial development. The area includes three national character areas- the Leicester Vales to the north, Dunsmore and Feldon to the south and the Northamptonshire Uplands covering the eastern fringes. There are no nationally or locally designated landscapes within the Borough [\[See reference 42\]](#).

C.55 The most comprehensive recent landscape character assessment for Rugby Borough was carried out in 2006. It found that the landscape in the north of Rugby is in particularly weak condition. To the south of the town the southern escarpment is of particular importance being highly sensitive and in strong condition. There are a number of sites of local significance around the urban fringe whose condition is in decline. These areas would benefit from further protection and enhancement measures to ensure their long-term benefit to future generations. These include Hillmorton Locks, Newbold, Cosford, Newton and the River Avon corridor. There are large areas to the east of the town where the condition of the landscape is also in decline but which are in less sensitive locations. There is no landscape located within the urban fringe that is of low sensitivity [\[See reference 43\]](#).

C.56 A further Landscape Sensitivity Study was carried out in August 2016; however it covers only parts of Rugby Borough – Binley Woods, Brinklow, Long Lawford, Ryton-on-Dunsmore, Stretton-on-Dunsmore, Wolston and Wolvey.

C.57 National Character Area (NCA) profiles created by Natural England are used to define the specific combination of landscape, geodiversity, biodiversity, history, culture and economic activity in the area. NCAs follow natural lines in the landscape instead of administrative boundaries.

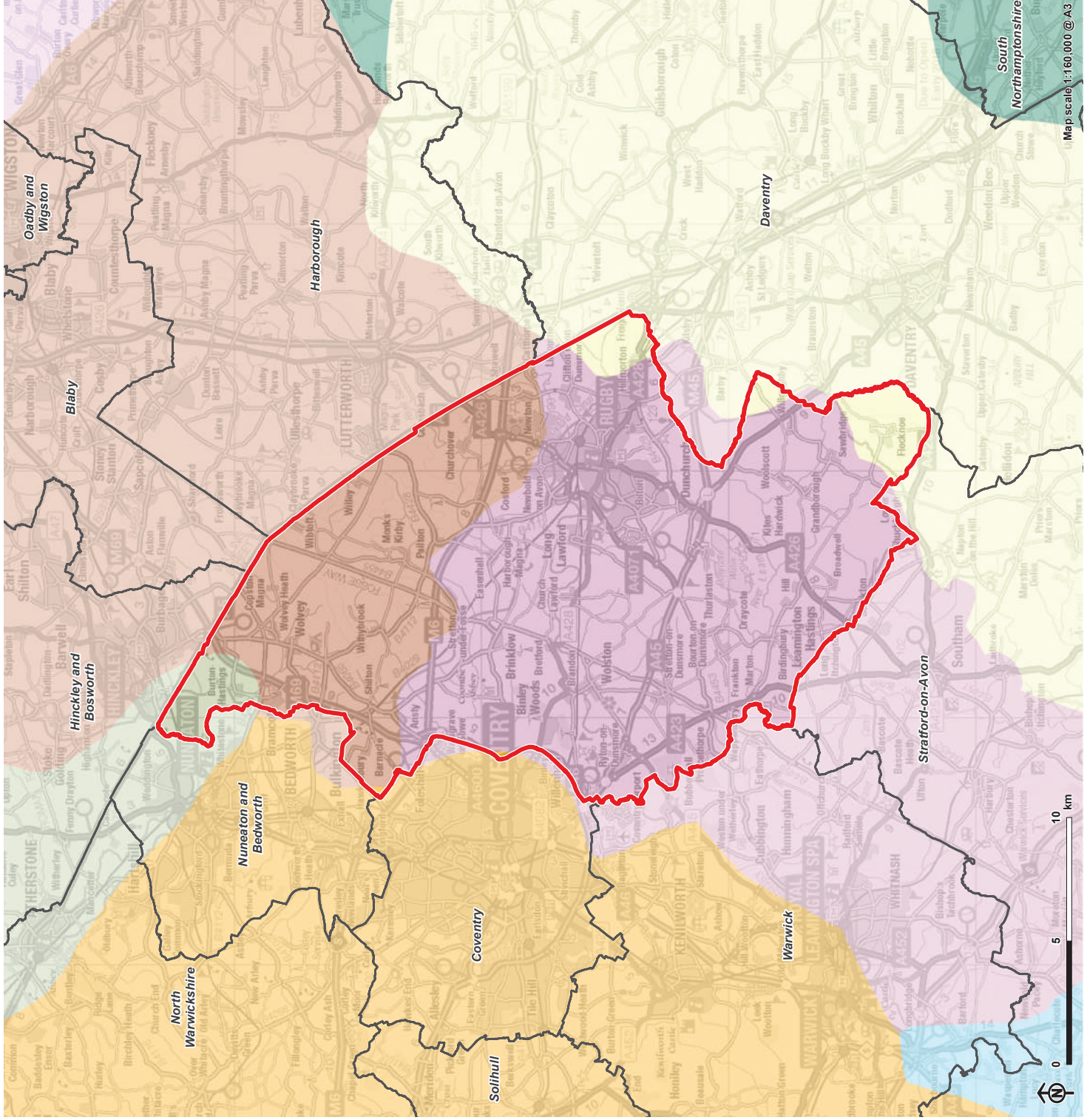
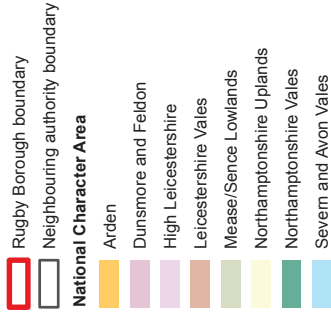
C.58 Rugby Borough lies within three National Character Areas. The parishes of Binley Woods; Brinklow; Long Lawford; Ryton-On-Dunsmore, Stretton-On-Dunsmore; and Wolston lie within National Character Area 96: Dunsmore and Feldon. Wolvey lies within National Character Area 94: Leicestershire Vales. Small areas to the east within Rugby Borough lie within National Character Area 95: Northamptonshire Uplands. Much of the west of the Borough, around Coventry, is Green Belt [\[See reference 44\]](#). These National Character Areas are summarised below:

- 94 Leicestershire Vales - Leicestershire Vales National Character Area (NCA) shares many characteristics with the neighbouring Northamptonshire Vales NCA. The Leicestershire Vales extend between the town of Hinckley in the west to Leicester in the northeast and southwards towards Market Harborough and Lutterworth. This is a large, relatively open, uniform landscape composed of low-lying clay vales interrupted by a range of varied river valleys. Its sense of place comes less from its overall landform and more from its visually dominant settlements and views towards surrounding higher ground. The city of Leicester dominates the north-eastern corner of the NCA. Other large- to medium-sized settlements include the towns of Market Harborough, Lutterworth and Hinckley, with many attractive small towns, villages and buildings and features of historic interest in between. The north of the area has a predominance of settlements and a general lack of tranquillity; this contrasts strongly with the distinctly more rural feel in the southern part of the area, where a mixture of arable and pastoral farmland is found. [\[See reference 45\]](#).
- 95 Northamptonshire Uplands - The Northamptonshire Uplands National Character Area (NCA) is an area of gently rolling, limestone hills and valleys capped by ironstone-bearing sandstone and clay Lias, with many long, low ridgelines. Rivers flow out from the NCA in all directions, including several major rivers – the Cherwell, Avon, Welland, Tove, Ouse, Nene and Ise. While there are areas of differing character, there are strong unifying landscape features across the Northamptonshire Uplands, most importantly the extensive areas of open field systems with ridge and furrow and the earthworks of deserted and shrunken settlements which occur throughout. Other features include the strong, mostly Parliamentary enclosure pattern with high, wide, A-shaped hedgerows bounding the

largely rectilinear fields with their frequent mature ash and oak trees; the many country houses and their associated extensive areas of historic and nationally important designed parkland landscapes; the distinctive ironstone, cob and brick nucleated settlements with their large stone churches, often with prominent steeples; the narrow lanes with very wide grassy verges; and the small, scattered but prominent broadleaved woods and coverts. There are also wide, long-distance views from the edges and across the ridgetops throughout the area [\[See reference 46\]](#).

- 96 Dunsmore and Feldon - Dunsmore and Feldon is predominantly a rural, agricultural landscape, crossed by numerous small rivers and tributaries and varying between a more open character in the Feldon area and a wooded character in Dunsmore. The name Feldon refers to the old English term feld meaning 'open cleared land' and expresses the contrast, in medieval times, with the more wooded Arden area to the north-west. The area is mainly within Warwickshire, with the southern boundary delineated by the steep limestone escarpment of the Cotswolds, and the northern boundary by the Leicestershire Vales. To the west lie the well-wooded pastures of Arden, together with the Severn and Avon Vales, while the undulating pastures and low hills of the Northamptonshire Uplands form the eastern border. It is an important food producing area and the agricultural expanse of large arable fields, improved pasture and small villages forms a transitional landscape between the surrounding National Character Areas (NCAs). The land to the north comprises the wedge-shaped area of low ridges and valleys lying between Leamington Spa, Coventry and Rugby, and is known as Dunsmore. This still retains a character of historic heathland and woodlands such as the Princethorpe Woodlands which are the most important cluster of ancient woodlands in Warwickshire and an outstanding example of a large area of semi-natural habitat. The woods sometimes create a sense of confinement in the generally open landscape. The fringes of the plateaux are all similar in character but have open views framed by low hills and settlements [\[See reference 47\]](#).

Figure C.6: National Character Areas



Renewable Energy

C.59 Table C.14 provides a summary of the number of renewable energy installations in Rugby Borough as at end of 2020 [\[See reference 48\]](#).

Table D.14: Renewable electricity installations in Rugby Borough

Installation Type	Installed Capacity (MW)
Photovoltaics	7.803
Onshore Wind	0.018
Hydro	0
Anaerobic Digestion	0.998
Offshore Wind	0
Wave/Tidal	0
Sewage Gas	0.425
Landfill Gas	6.063
Municipal Solid Waste	0
Animal Biomass	0
Plant Biomass	0.460

C.60 During the monitoring period of 1st April 2020 to 31st March 2021, no planning applications were approved concerning sustainable energy sources.

Pollution

Air Quality

C.61 Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas.

C.62 Rugby Borough Council produces an annual report outlining the air quality monitoring which has taken place and potential impacts to air quality not currently being monitored. The monitoring of air quality focuses on nitrogen dioxide, particulate matter (dust) and sulphur dioxide. The main pollutants within Rugby Borough are from road traffic in particular the M6, M69 and M45. Monitoring data for 2020 showed a continuation of an overall decreasing trend in annual mean NO₂ concentrations since 2016. Concentrations in 2020 decreased at all monitoring locations compared to 2019. There were no exceedances of the annual mean NO₂ Air Quality Standard (AQS) objective in 2020, with a highest annual mean concentration of 33.5 µg/m³. The reduced NO₂ concentrations in 2020 are likely to be in part due to the COVID-19 pandemic and associated government restrictions [\[See reference 49\]](#).

Air Quality Management Areas

C.63 There is an obligation on all local authorities under Part IV of the 1995 Environment Act to review regularly and assess air quality in their areas and to determine whether or not national air quality objectives are likely to be achieved. Where exceedances are considered likely, the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of required air quality improvements.

C.64 Rugby Borough Council declared an Air Quality Management Area (AQMA) in 2004 for exceedances of the annual mean NO₂ objective. This area covers the whole urban area of Rugby bounded by the southern boundary with Daventry District Council, the A5, M6, minor roads to the west of Long Lawford, A45 and M45. Between 2011 and 2015, Rugby has been below the national average for the Public Health Framework Indicator, 'Fraction of mortality attributable to particulate air pollution'. However, in 2016 the fraction value increased markedly from 4.6% to 5.5% and was higher than the national average (5.3%) for that time. In 2017, the fraction value decreased to 5.0% and was below the national average of 5.1% [\[See reference 50\]](#).

Waste

C.65 Warwickshire County Council has adopted the Warwickshire Waste Core Strategy Local Plan 2013-2028 which sets out the Spatial Strategy, Vision, Objectives and Policies for managing waste for a 15-year plan period up to 2028. It also provides the framework for waste development management including implementation and monitoring. There are currently five active landfills in the county receiving the complete range of waste including stabilised non-reactive hazardous waste cells at two landfills. New waste facilities will be developed on industrial estates, brownfield industrial land and existing waste management facilities [\[See reference 51\]](#).

C.66 Between 2020-2021, a total of 47,109 tonnes of waste was collected within Rugby Borough, of which 43,297 tonnes was household waste. This compares with 47,146 tonnes and 43,680 tonnes respectively in 2014-2015. Within the same period, 19,476 tonnes of household waste were sent for recycling/composting/re-use, equating to 45% of waste collected. This figure is slightly higher than the overall recycling rate for England of 42.3% of all waste. Between 2014-2015 within Rugby Borough, 46% of household waste was recycled/composted/re-used [\[See reference 52\]](#).

C.67 Unauthorised Traveller sites usually lack facilities and services, such as waste disposal, and can cause communities significant distress from extensive litter and waste [\[See reference 53\]](#). Research and experience tend to strongly

suggest that over the last four years most local authority areas in Warwickshire have experienced an increase in unauthorised encampments by Gypsy and Traveller communities [See reference 54].

C.68 The 2016 report by De Montfort University and the Joseph Rowntree Foundation, published by the Chartered Institute of Housing, identified that fly-tipping is also upsetting for residents of authorised sites as often residents do not know who is dumping rubbish or it is being brought by people from off the site [See reference 55].

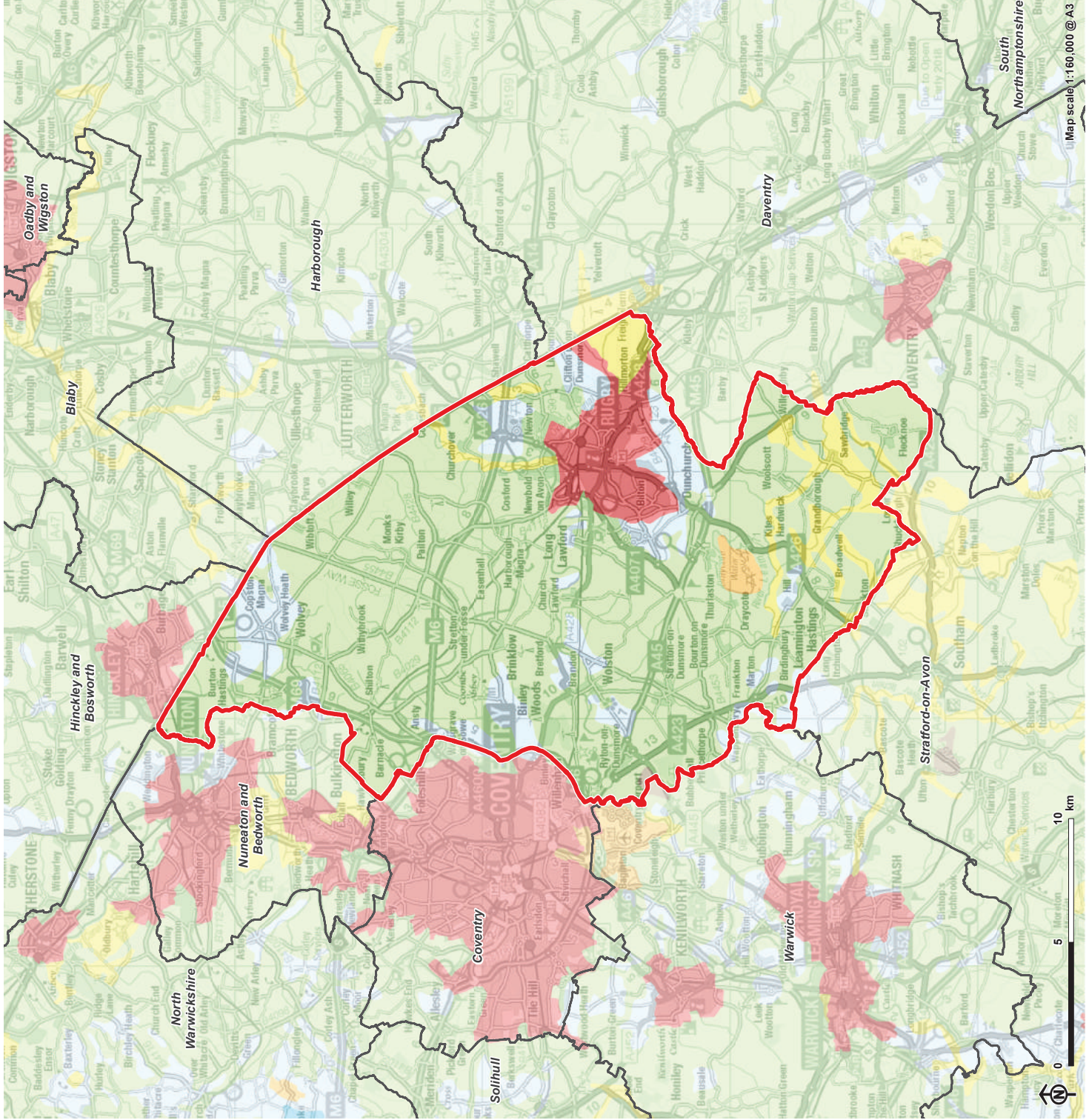
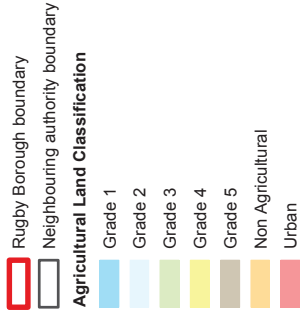
Natural Resources

Soil

C.69 The Agricultural Land Classification (ALC) system [See reference 56] provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought and erosion. These factors, together with interactions between them, form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be best and most versatile agricultural land.

C.70 According to Natural England's Agricultural Land Classification, land within Rugby Borough mainly comprises Grade 3 agricultural land, although there are small areas of Grade 2 land in the north and west of the Borough as well as to the south of Rugby town.

Figure 3.7: Agricultural Land Classification



Geology and Minerals

C.72 The geology of Rugby Borough consists predominantly of sedimentary rocks and is represented by three major geological periods from the older Permian rocks through the Triassic to the younger Jurassic period. The Permian rocks make up less than 0.5% of the geology consisting of some Sherwood Sandstones. The Borough is dominated by Triassic limestone rocks, which make up approximately 60% of the geology. Limestones are impervious and do not allow water to percolate so readily but tend to be indicative of well-drained land due to their common well-jointed characteristics. The remaining 40% of the geology in the Borough is represented by Jurassic argillaceous rocks; clay rich rocks where soils are not so well drained.

C.73 There are two sites designated as Local Geological Sites (formerly Regionally Important Geological Sites, RIGS) in the Borough (Parkfield Road Quarry, and Royal Oak Gravel Pit & Cutting). Parkfield Road Quarry was designated as it is a good example of Rugby Limestone, while Royal Oak Gravel Pit and Cutting is a good example of the Hillmorton Member of the Middle Pleistocene Wolston Formation.

Contaminated Land

C.74 Land can be contaminated by a variety of sources, such as waste disposal, industry or naturally occurring substances. For land to be classed as contaminated, it must pose a significant risk to either humans, wildlife or water resources. Rugby Borough published its Contaminated Land Strategy in 2001. The Contaminated Land Strategy sets out the steps taken to identify, inspect and remediate contaminated land.

C.75 By law, a local authority must keep a public register of contaminated land. There are currently no entries on the Rugby Borough register of contaminated land. A 2016 report by De Montfort University and the Joseph Rowntree

Foundation, published by the Chartered Institute of Housing, outlined some of the challenges in turning evidenced need for accommodation into Gypsy and Traveller sites identified in Local Plans, and then from plans into accommodation on the ground [\[See reference 57\]](#). One of the challenges to delivering sites is the cost of decontamination of sites from previous uses.

C.76 According to the Authority Monitoring Report 2020/21, 55% of new homes built in that monitoring year were constructed on previously developed land [\[See reference 58\]](#).

Water




C.77 The major river running through Rugby Borough is the River Avon which flows through Rugby town and eventually meets the River Severn. The other main rivers in Rugby Borough are the River Swift, River Anker, Clifton Brook, Withy Brook, River Leam, Millholme Brook, Birdingbury Brook, River Itchin and Sow Brook.

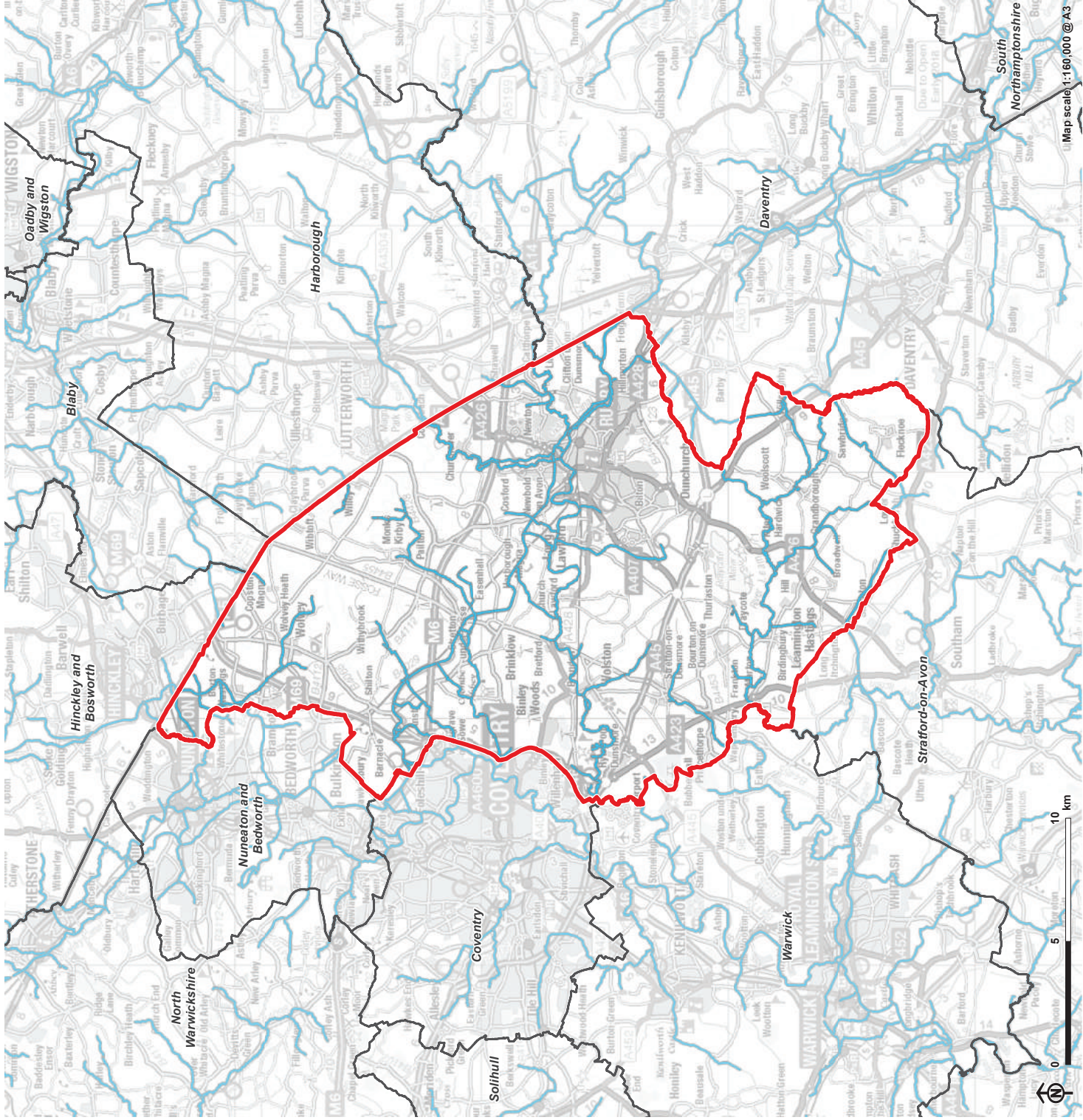
C.78 The EU Water Framework Directive (2000/60/EC) looks at the ecological and chemical health of both groundwater and surface water with the aim of achieving 'moderate or good ecological status' and 'good chemical status' by 2027, and to ensure that there is no deterioration from existing statuses. The House of Commons published a water quality in rivers report in 2022 [\[See reference 59\]](#). Only 14% of rivers in England can currently claim to have good ecological status. The Government is not on track to meet the Water Framework Directive requirement for all rivers to reach good status by 2027 .

C.79 The Environment Agency collects data in relation to the Avon Warwickshire Management Catchment. The latest published data was 2019. Within this catchment there are three operational catchments, all of which fall within Rugby Borough: Avon Rural Rivers and Lakes; Avon – Midlands West and Avon Urban Rivers and Lakes. Across the Avon Warwickshire Management Catchment there are 78 water bodies mainly consisting of river, canals and surface water transfers and lakes. All of the 78 waterbodies failed the chemical

Appendix C Baseline Information

status. In relation to ecological status, one waterbody was rated as good; 54 waterbodies were rated as moderate; 22 were rated as poor and one was rated as bad [\[See reference 60\]](#).

 Rugby Borough boundary
 Neighbouring authority boundary
 Watercourse



Flood Risk

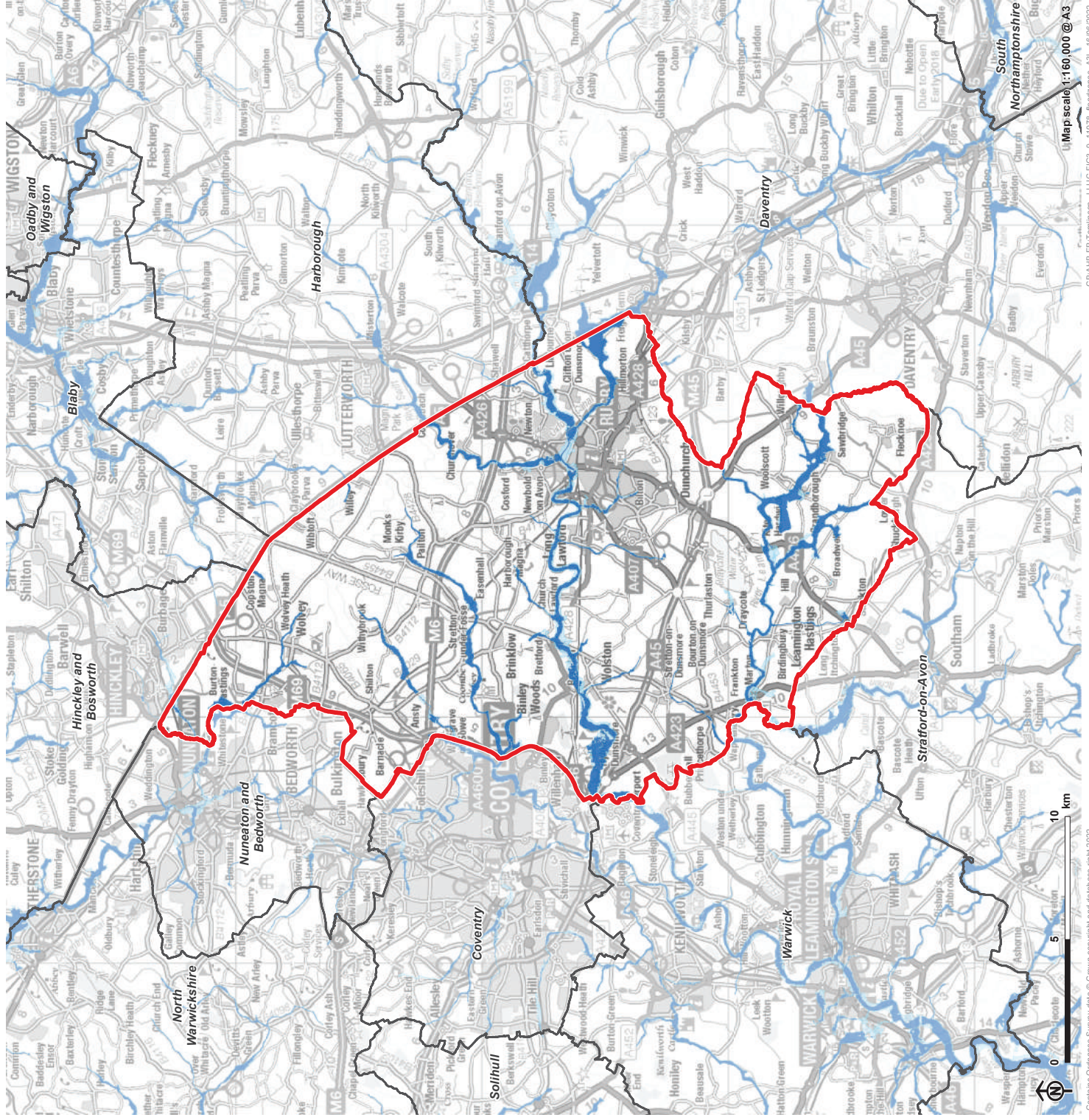
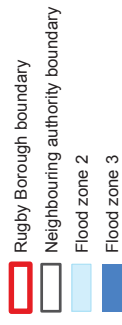
C.80 Flood risk in the Borough is implicitly linked to climate change considering the changes predicted in weather patterns and the impact this will have on river levels and the ability for safe infiltration of surface water.

C.81 The most substantial areas of flood risk lie along the main water bodies of Rugby Borough particularly the River Avon which flows through Rugby town. The floodplains along the River Avon and its tributaries largely fall within Flood Zone 3 with small areas within Flood Zone 2. There are multiple water storage areas along the River Avon within and on the edges of Rugby town. A large area on either side of the southern end of the A5 which cover mainly undeveloped land lies within Flood Zone 3 [\[See reference 61\]](#).

C.82 The risk of flooding in the Borough has been determined through the production of a Strategic Flood Risk Assessment (SFRA) [\[See reference 62\]](#), which identifies the Main Rivers, ordinary watercourses and flood zones, including the functional floodplains and provides an assessment of the implications of climate change on flood risk.

C.83 The Gypsy and Traveller community can be particularly vulnerable to the impacts of flooding. National Planning Practice Guidance identifies caravans, mobile homes and park homes intended for permanent residential use as a 'highly vulnerable use', which is suitable in areas of flood zone 1 but would require an exception test in flood zone 2 and is unsuitable in flood zones 3a or 3b [\[See reference 63\]](#).

Figure C.9: Flood Risk



Appendix D

Site Assessment Criteria and Assumptions

Assumptions regarding distances

D.1 A number of the appraisal assumptions refer to accessibility from site options to services, facilities, employment etc. There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation categorises distances depending upon location and purpose of the trip, and 'desirable', 'acceptable', and 'preferred maximum':

D.2 Town centres

D.3 Desirable – 200m

D.4 Acceptable – 400m

D.5 Preferred maximum – 800m

D.6 Commuting/School/Sight-seeing

D.7 Desirable – 500m

D.8 Acceptable – 1,000m

D.9 Preferred maximum – 2,000

Appendix D Site Assessment Criteria and Assumptions

D.10 Elsewhere

D.11 Desirable – 400m

D.12 Acceptable – 800m

D.13 Preferred maximum – 1,200m

D.14 For the purposes of the appraisal, distances in the appraisal will be measured as the straight line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances are likely to be greater (depending on the availability of a direct route).

D.15 It is recognised that many journeys to services and facilities will not be made in a straight line. When applying the Institute of Highways and Transportation distances for the appraisal of site options to each of the relevant distances a 10% buffer has therefore been applied to account for the potential difference between the straight line distance and the actual distance involved in a journey to services and facilities. For example, the relevant distance applied for walking distance for town and local centres has been decreased from 800m to 720m, and so on.

D.16 It is considered that this is a reasonable approach, and professional judgement will be used when applying these distances to each site option and the range of services and facilities considered by the appraisal (e.g. where there are significant barriers to straight-line movement, such as railway lines). The distances used in the appraisal will vary depending upon the type of destination being accessed and the mode of transport:

- 450m walking distance for primary schools on the basis that parents with young children are unlikely to want long distances with young children.
- 900m walking distance for secondary schools.
- 720m walking distance for town and local centres.

- 450m to a bus stop, as many people are unlikely to want to walk much further and then catch a bus to their destination.
- 1,800m walking distance to a train station.
- In terms of access to cycle route, a distance of 450m will be used in the appraisal on the assumption that links to cycle routes are likely to use road carriageways.

SA Objective 1: Reduce/eliminate poverty, disadvantage and social exclusion

D.17 Most of the issues covered by this SA objective will not be directly affected by the location of Gypsy and Traveller site options. While the location of sites could affect access to services, jobs and education opportunities, these factors are considered separately under SA objectives 2, 3 and 14. Therefore, all site options will have a negligible (0) effect on this SA objective.

SA Objective 2: Encourage increased engagement in leisure, cultural activity, recreation and improve access across all sections of the community

D.18 The effects of Gypsy and Traveller site options on this SA objective will depend on their proximity to Rugby town and the main rural settlements where leisure, sports and recreation facilities are likely to be concentrated. Impacts will also depend on access to open space. Some parts of Rugby Borough are in closer proximity to Coventry outside of the Rugby Borough boundary.

- Gypsy and Traveller site options that are within 200m (<200m) of Rugby, Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston, Wolvey, Coventry, or are within 400m (<400m) of a PRow, cycle route, or an area of open space are likely to have a significant positive (++) effect.

- Gypsy and Traveller site options that are within 200-400m of Rugby, Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston, Wolvey, Coventry or are within 400-800m of a PRow, cycle route, or an area of open space are likely to have a minor positive (+) effect.
- Gypsy and Traveller site options that are within 400m-800m or more than 800m from Rugby, Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston, Wolvey, Coventry, or that are within 800m-1,200m or more than 1,200m from a PRow, cycle route, or an area of open space are likely to have a minor negative (-) effect.

SA Objective 3: Protect and enhance the health and well-being of the Gypsy, Traveller and Travelling Showperson communities and reduce health inequalities

- Where Gypsy and Traveller site options are within walking distance of existing healthcare facilities, residents should have good access to healthcare facilities. Access to open space for sport and recreation (which can benefit health and well-being) is considered separately under SA objective 2 below. Gypsy and Traveller site options that are within 400m of either a hospital or a GP surgery are likely to have a significant positive effect (++).
- Gypsy and Traveller site options that are within 400-800m of either a hospital or a GP surgery are likely to have a minor positive effect (+).
- Gypsy and Traveller site options that are more than 800m from a hospital or a GP are likely to have a minor (-) negative effect.

D.19 The proximity of Gypsy and Traveller site options to motorways, motorway junctions, railway lines, railway stations, and Mineral and Waste safeguarded sites, are assumed to have a negative impact on residents' exposure to noise, light, odour, dust and/or air pollution. In line with the DMRB guidance, it is

assumed that receptors would be most vulnerable to these impacts within 200m of a main road. Therefore (which may result in mixed effects with the above):

- Gypsy and Traveller site options that are within 200m of a motorway, motorway junction, A road, railway line, railway station or a Mineral and Waste safeguarded site are likely to have a significant negative effect (--).

SA Objective 4: Provide all Gypsies, Travellers and Travelling Showpeople with the opportunity to live in a decent home which meets their needs

D.20 All of the Gypsy and Traveller site options would have positive effects on this SA objective as all would go some way towards meeting the identified need for Gypsy and Traveller sites in Rugby Borough. There is no one ideal size of site or number of pitches. It should be noted that smaller sites can be successful, particularly where designed for one extended family. Therefore, all sites are expected to result in significant positive effects (++).

SA Objective 5: Reduce crime, fear of crime and anti-social behaviour

D.21 The effects of new Gypsy and Traveller sites on levels of crime and fear of crime will depend on factors such as the incorporation of green space within the sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of Gypsy and Traveller sites (rather they will be determined through the detailed proposals for each site) and so the effects of all of the potential Gypsy and Traveller sites on this SA objective will be negligible (0).

SA Objective 6: Promote/enable a strong, stable and sustainable local economy

D.22 The locations of Gypsy and Traveller sites will not influence the number or type of employment opportunities available; however they will influence how easily people are able to access employment opportunities.

D.23 GIS data showing the location of existing employment sites is available; however it is assumed that employment opportunities will also be focussed in the main town of Rugby as well as neighbouring Coventry.

- Gypsy and Traveller site options that are within 200m of Rugby town and Coventry or are within 500m (<500m) of a known large employment site are likely to have a significant positive (++) effect.
- Gypsy and Traveller site options that are within 200-400m of Rugby town and Coventry or are within 500m-1000m of a known large employment site are likely to have a minor positive (+) effect.
- Gypsy and Traveller site options that are more than 400m from Rugby town and Coventry or are more than 1,000m from a known large employment site are likely to have a minor negative (-) effect.

SA Objective 7: Promote the vitality and viability of the town centre

D.24 The effects of Gypsy and Traveller sites on this SA objective will depend on their proximity and access to the main settlements and communities in Rugby Borough.

- Gypsy and Traveller site options that are within 200m of Rugby town, Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston or Wolvey are likely to have a significant positive (++) effect.

- Gypsy and Traveller site options that are within 200-400m of Rugby town, Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston or Wolvey are likely to have a minor positive (+) effect.
- Gypsy and Traveller site options that are more than 400m from Rugby town, Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston or Wolvey are likely to have a minor negative (-) effect.

SA Objective 8: Promote the regeneration of urban areas

D.25 Most of the issues covered by this SA objective will not be directly affected by the location of Gypsy and Traveller site options. While Gypsy and Traveller site options may be in built up areas, and would contribute more positively to this objective if they are on brownfield land, this issue is considered under SA objective 9 below. Therefore, all Gypsy and Traveller site options will have a negligible (0) effect on this SA objective.

SA Objective 9: Use and manage land, energy, soil, mineral and water resources prudently and efficiently, and increase energy generated from renewables

D.26 Gypsy and Traveller site options that are on previously developed (brownfield land) would represent more efficient use of land than development on greenfield sites. Where development takes place on previously undeveloped high quality agricultural land, this would result in the loss of those high quality soils. The energy efficiency of development will depend on its design and onsite practices rather than its location. Therefore:

Appendix D Site Assessment Criteria and Assumptions

- Site options that are entirely or mainly (>50%) on brownfield land would have a significant positive (++) effect, regardless of the agricultural quality of the land.
- Site options that are entirely or mainly (>50%) on greenfield land that is classed as Grade 2 agricultural land is likely to have a significant negative (--) effect.
- Site options that are entirely or mainly (>50%) on greenfield land that is classed as Grade 3 agricultural land are likely to have a significant negative (--?) effect although this is uncertain depending on whether the land is Grade 3a or 3b which is not known.
- Site options that are entirely or mainly (>50%) on greenfield land that is classed as Grade 4, Grade 5 or urban land are likely to have a minor negative (-) effect.

SA Objective 10: Minimise waste and manage it sustainably

D.27 The effects of new Gypsy and Traveller sites on minimising waste and manage it sustainably will depend on factors such as the incorporation of waste management systems and recycling within Gypsy and Traveller sites. However, such issues will not be influenced by the location of sites (rather they will be determined through the detailed proposals for each site) and so the effects of all of the potential Gypsy and Traveller sites on this SA objective will be negligible (0).

SA Objective 11: Reduce the Borough's contribution to climate change

D.28 Levels of greenhouse gas emissions from built development will depend on its design and onsite practices rather than its location; therefore the main way in which Gypsy and Traveller site options would affect this SA objective is

through the extent to which they allow for reduced car use. This is considered separately under SA objective 14; therefore negligible (0) effects are identified for all site options.

SA Objective 12: Avoid, reduce and manage flood risk

D.29 The development of Gypsy and Traveller sites on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. In terms of the impact on the Gypsy and Traveller community, National Planning Practice Guidance identifies caravans, mobile homes and park homes intended for permanent residential use as a 'highly vulnerable use', which is suitable in areas of flood zone 1 but would require an exception test in flood zone 2 and is unsuitable in flood zones 3a or 3b.

D.30 While new development in any location may offer good opportunities to incorporate SuDS, and therefore have a positive effect on reducing flood risk, this would depend on the design of the proposed development and not on the location of the site. Therefore:

- Gypsy and Traveller sites that are entirely or mainly (more than 50%) on greenfield land that is within flood zone 2, or sites that are within flood zones 3a or 3b (regardless of whether they are on greenfield or brownfield land) are likely to have a significant negative (--) effect. In addition, Gypsy and Traveller sites in areas of risk of surface water flooding would also have a significant negative (--) effect.
- Gypsy and Traveller sites that are either entirely or mainly (i.e. more than 50%) on greenfield land outside of flood zone 2, or that are entirely or mainly (more than 50%) on brownfield land within flood zone 2, are likely to have a minor negative (-) effect.
- Gypsy and Traveller sites that are on brownfield land outside of flood zones 2, 3a and 3b are likely to have a negligible (0) effect.

SA Objective 13: Conserve and enhance the historic environment, heritage assets and their settings

D.31 The NPPF states that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)”. However, development could also enhance the significance of the asset (provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset).

D.32 In all cases, effects will be uncertain at this stage as the potential for negative or positive effects on historic and heritage assets will depend on the exact scale, design and layout of the new Gypsy and Traveller sites and on opportunities which may exist to enhance the setting of heritage features.

D.33 Where a site option is within proximity of a designated heritage asset, professional judgement and evidence (such as Conservation Area Appraisals, heritage assessment work undertaken to support the DPD and input from conservation specialists) will be used to inform judgements. Where there are potential impacts on multiple heritage assets this will also be taken into account.

- Sites which have potential for heritage assets to be enhanced and their significance to be better revealed will have a minor positive (+?) or significant positive (++?) effect on this objective.
- Sites which are unlikely to cause adverse impacts on heritage assets will have a negligible (0?) effect on this objective.
- Sites which have the potential to cause harm to heritage assets, but can be mitigated, will have a minor negative (-?) effect on this objective.
- Sites which have the potential to cause harm to heritage assets where it is unlikely that these can be adequately mitigated will have a significant negative (--?) effect on this objective.

SA Objective 14: Promote a sustainable and accessible transport network

D.34 Where Gypsy and Traveller sites are located within or adjacent to Rugby town or Coventry (outside of the Borough boundary) there are likely to be good opportunities to reduce journey lengths and to walk and cycle day to day to access the jobs, services and facilities that tend to be focussed there.

D.35 Outside of the main towns, opportunities to reduce car use will depend largely on the availability of public transport links. Therefore:

- Gypsy and Traveller site options that are within 200m of Rugby town or Coventry, or that are within 400m of a bus stop or railway station are likely to have a significant positive (++) effect.
- Gypsy and Traveller site options that are within 200-400m of Rugby town or Coventry, or that are within 400-800m of a bus stop or railway station are likely to have a minor positive (+) effect.
- Gypsy and Traveller site options that are more than 400m from Rugby town or Coventry, or that are more than 800m from a bus stop or railway station are likely to have a minor negative (-) effect.

SA Objective 15: Reduce all forms of pollution

D.36 Gypsy and Traveller sites that are within, or directly connected via road, to the Air Quality Management Area (AQMA) that has been declared in the Borough, or AQMAs in surrounding Districts, could increase levels of air pollution in those areas as a result of increased vehicle traffic. Therefore:

- Site options that are within or directly connected via road to an AQMA are likely to have a significant negative (--) effect.
- Site options that are not within or directly connected via road to an AQMA are likely to have a negligible (0) effect on air quality

D.37 Construction activities and operation of sites in or near water have the potential to cause pollution, impacting upon the bed and banks of watercourses and impacting upon the quality and quantity of the water.

- Gypsy and Traveller site options that are within 10m of a watercourse are likely to have a significant negative (--) effect.
- Gypsy and Traveller site options that are within 10-200m of a watercourse are likely to have a minor negative (-) effect.
- Gypsy and Traveller site options that are more than 200m from a watercourse are likely to have a negligible (0) effect.

D.38 Exposure to noise and light pollution is covered under SA Objective 3.

SA Objective 16: Conserve and where possible enhance the Borough's biodiversity, flora and fauna

D.39 Gypsy and Traveller sites that are within close proximity of an internationally, nationally or locally designated biodiversity or geodiversity site have the potential to affect those sites, through habitat damage/loss, fragmentation, disturbance to species, air pollution, trampling etc. Conversely, there may be opportunities to promote habitat connectivity if Gypsy and Traveller sites include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential Gypsy and Traveller sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.

- Sites that are within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites may have a significant negative (--?) effect.

Appendix D Site Assessment Criteria and Assumptions

- Sites that are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or that are within 250m of a locally designated site may have a minor negative (-?) effect.
- Sites that are more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, or that are over 250m from a locally designated site could have a negligible (0?) effect.

D.40 Site options that contain an existing green infrastructure asset that could be lost as a result of new development may have a significant negative effect (--?) although this is currently uncertain as it may be possible to conserve or even enhance that asset through the design and layout of the new site.

SA Objective 17: Maintain and where possible enhance the quality of landscapes

D.41 As there are no National Parks or Areas of Outstanding Natural Beauty within or immediately adjacent to Rugby Borough, the location of Gypsy and Travellers sites is not expected to affect these landscape designations.

D.42 The sensitivity of the Borough to development was assessed in the Landscape Assessment of the Borough of Rugby: Sensitivity and Condition Study (2006). In 2016, a Landscape Sensitivity Study was carried out for Binley Woods; Brinklow; Long Lawford; Ryton-on-Dunsmore; Streeton-on-Dunsmore; Woolston & Wolvey.

- Sites that are within an area classed as being of very high or high overall sensitivity could have a significant negative (--?) effect.
- Sites that are within an area classed as being of moderate overall sensitivity could have a minor negative (-?) effect.
- Sites that are within an area classed as being of low overall sensitivity, or sites in an area classed as „urban“ could have a negligible (0?) effect.

D.43 In all cases effects are uncertain as they will depend to some extent on the design of the development and the incorporation of mitigation measures such as screening.

SA Objective 18: Maintain and where possible enhance the quality of townscapes

D.44 It is assumed that all new Gypsy and Traveller sites will be of high quality design. Where new sites take place on brownfield land, there are likely to be positive effects on the townscape as a result of reducing the number of derelict sites and buildings and replacing them with high quality new development.

- Sites on brownfield land are likely to have a minor positive (+) effect on this objective.
- Sites on greenfield land would have a negligible (0) effect on this objective.

D.45

References

- 1 ONS (2020) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland [online] Available at:
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwales/scotlandandnorthernireland>
- 2 Rugby Borough Gypsy and Traveller Site Allocations DPD (May 2022) SA Scoping Report
- 3 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531).
- 4 The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London.
- 5 Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework
- 6 Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance
- 7 Department for Communities and Local Government Planning policy for Traveller sites:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf
- 8 Rugby Borough Council Local Plan 2011-2031 (2019) [online] Available at:
https://www.rugby.gov.uk/downloads/file/2319/local_plan_2011-31
- 9 United Nations Treaty Collection (2016) Paris Agreement
- 10 Carbon Budget: Rugby [online] Available at:
<https://carbonbudget.manchester.ac.uk/reports/E07000220/>

References

- 11 Rugby Borough Council (2019) Becoming Carbon Neutral [online]
Available at:
https://www.rugby.gov.uk/info/20025/the_council/436/becoming_carbon_neutral
- 12 ONS and Department for Business, Energy & Industrial strategy (2019)
2005 to 2019 UK local and regional CO2 emissions – data tables,
available at: <https://data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019>
- 13 ONS on behalf of Department for Business, Energy & Industrial Strategy
(2020) 2019 UK greenhouse gas emissions, provisional figures
- 14 Department for Transport, Electric vehicle charging device statistics:
January 2022 [online] Available at:
<https://www.gov.uk/government/statistics/electric-vehicle-charging-device-statistics-january-2022>
- 15 GOV.UK (2019) Total final energy consumption at regional and local
authority level: 2005 to 2019 [online] Available at:
<https://www.gov.uk/government/statistics/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2019>
- 16 Warwickshire County Council (2021) Warwickshire Insights [online]
Available at: <https://data.warwickshire.gov.uk/population/reports/#/view-report/80ce2c2a7cf543688fb39ce97ec7478e/E07000220>
- 17 Warwickshire County Council (2021) Warwickshire Insights [online]
Available at: <https://data.warwickshire.gov.uk/population/reports/#/view-report/80ce2c2a7cf543688fb39ce97ec7478e/E07000220>
- 18 NOMIS (2011) Ethnic group by sex by age [online] available at:
https://www.nomisweb.co.uk/census/2011/DC2101EW/view/1946157183?rows=c_ethpuk11&cols=c_sex
- 19 Nomis (2011) DC1203EW - Dependent children by ethnic group of
Household Reference Person (HRP) by age [online] Available at:
https://www.nomisweb.co.uk/census/2011/DC1203EW/view/1946157183?rows=c_ethhuk11&cols=age_of_dependent_child

References

- 20** ONS (2014) What does the 2011 Census tell us about the Characteristics of Gypsy or Irish Travellers in England and Wales? Available at:
http://www.ons.gov.uk/ons/dcp171776_349352.pdf
- 21** Rugby Borough Council Authority Monitoring Report 2020-2021 [online] Available at:
https://www.rugby.gov.uk/downloads/download/48/annual_monitoring_reports
- 22** Rugby Borough Council Gypsy and Traveller Site Need and Supply Background Paper (2021) [pdf]
- 23** NOMIS (2011) Ethnic group by accommodation type [online] Available at:
https://www.nomisweb.co.uk/census/2011/DC2121EW/view/1946157183?rows=c_typaccom&cols=c_ethpuk11
- 24** NOMIS (2011) Tenure by ethnic group by age – Household Reference Persons [online] Available at:
https://www.nomisweb.co.uk/census/2011/DC4201EW/view/1946157183?rows=c_tenhuk11&cols=c_ethpuk11
- 25** Rugby Borough Council (2017) Gypsy and Traveller Accommodation Assessment Study [online] Available at:
<https://www.rugby.gov.uk/GTAA2017>
- 26** DCLG (2019) The English Indices of Deprivation [online] Available at:
<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>
- 27** Ministry of Housing, Communities & Local Government (2019) IdD2019 Interactive Dashboard – local Authority Focus – Rugby [online] Available at:
<https://app.powerbi.com/view?r=eyJrIjojOTdjYzlyNTMtMTcxNi00YmQ2LW11YzgtMTUyYzMxOWQ3NzQ2IiwidCI6ImJmMzQ2ODEwLTljN2QtNDNkZS1hODcyLTI0YTJlZjM5OTVhOCJ9>
- 28** The Traveller Movement (2017) The last acceptable form of racism? The pervasive discrimination and prejudice experienced by Gypsy, Roma and Traveller communities [pdf] Available at:
<https://travellermovement.org.uk/phocadownload/userupload/equality->

References

- [human-rights/last-acceptable-form-of-racism-traveller-movement-report.pdf](#)
- 29** Rugby Borough Council Authority Monitoring Report 2020-2021 [online]
Available at:
https://www.rugby.gov.uk/downloads/download/48/annual_monitoring_reports
- 30** Rugby Borough Authority Monitoring Report 2020-2021 [online] Available at:
https://www.rugby.gov.uk/downloads/file/3248/authority_monitoring_report_2020-2021
- 31** NOMIS (2011) Economic activity by ethnic group by sex by age [online]
Available at:
<https://www.nomisweb.co.uk/query/construct/components/stdSearch.asp?menuopt=12&subcomp=101>
- 32** NOMIS (2011) Occupation by ethnic group by sex by age [online]
Available at:
https://www.nomisweb.co.uk/census/2011/DC6213EW/view/1946157183?rows=c_occuk11_2&cols=c_ethpuk11
- 33** ONS (2014) What does the 2011 Census tell us about the Characteristics of Gypsy or Irish Travellers in England and Wales? [online] Available:
http://www.ons.gov.uk/ons/dcp171776_349352.pdf
- 34** NOMIS (2011) Economic activity by ethnic group by sex by age [online]
Available at:
<https://www.nomisweb.co.uk/query/construct/components/stdSearch.asp?menuopt=12&subcomp=101>
- 35** Warwickshire County Council (2019) Warwickshire Rail Strategy 2019-2034 [online] Available at:
<https://api.warwickshire.gov.uk/documents/WCCC-1615347118-475>
- 36** NOMIS (2011) Tenure by car or van availability by ethnic group [online]
Available at:
https://www.nomisweb.co.uk/census/2011/DC4203EW/view/1946157183?rows=c_ethpuk11&cols=c_carsno

References

- 37** Rugby Borough Council (2017) Habitat and Biodiversity Audit [online]
Available at:
https://www.rugby.gov.uk/downloads/file/1401/lp_41_habitat_and_biodiversity_audit_june_2017
- 38** Habitat and Biodiversity Audit Rugby Borough Council Local Plan 2011-2031 (2017) [online] Available at:
https://www.rugby.gov.uk/downloads/file/1401/lp_41_habitat_and_biodiversity_audit_june_2017
- 39** Rugby Borough Council Conservation Areas and Character Appraisal [online] Available at:
https://www.rugby.gov.uk/info/20084/planning_control/43/conservation_areas_and_character_appraisals/2
- 40** Warwickshire County Council 2010 Warwickshire Historic Landscape Characterisation Project [online] Available at:
https://www.warwickdc.gov.uk/downloads/file/2405/he01_warwickshire_historic_landscape_characterisation_web_-_2010
- 41** Rugby Borough Council (2019) Rugby Borough Council Local Plan 2011-31 [online] Available at;
https://www.rugby.gov.uk/downloads/file/2319/local_plan_2011-31
- 42** White Consultants (March 2011) Rugby Borough Landscape Capacity Study for Wind Energy Developments
- 43** Landscape Assessment of the borough of Rugby 2006
- 44** Natural England (2014) National Character Area Profiles [online] Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>
- 45** Natural England NCA Profile: 94 Leicestershire Vales (NE532) [online]
Available at:
<http://publications.naturalengland.org.uk/publication/4900422342934528?category=587130>
- 46** Natural England NCA Profile: 95 Northamptonshire Uplands [online]
Available at:

References

- <http://publications.naturalengland.org.uk/publication/5007752023769088?category=587130>
- 47 Natural England NCA profile: 96 Dunsmore and Feldon [online] Available at:
<http://publications.naturalengland.org.uk/publication/4878893332824064?category=587130>
- 48 GOV.UK (2020) Regional Renewable Statistics [online] Available at:
<https://www.gov.uk/government/statistics/regional-renewable-statistics>
- 49 Rugby Borough Council (2021) 2021 Air Quality Annual Status report (ASR) [online] Available at:
https://www.rugby.gov.uk/downloads/file/3199/draft_air_quality_annual_status_report_2021
- 50 Rugby Borough Council (2021) Rugby Borough Council Air Quality Supplementary Planning Document [online] Available at:
https://www.rugby.gov.uk/directory_record/50725/air_quality_supplementary_planning_document_spd/category/92/supplementary_planning_documents
- 51 Warwickshire County Council (2013) Warwickshire Waste Core Strategy Adopted Local Plan 2013-2028 [online] Available at:
<https://api.warwickshire.gov.uk/documents/WCCC-680-279>
- 52 GOV.UK (2020) ENV18 – Local authority collected waste: annual results table [online] Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>
- 53 House of Commons (2019) Gypsies and Travellers Briefing Paper [pdf] Available at: <https://dera.ioe.ac.uk/33756/2/CBP-8083.pdf>
- 54 Warwickshire Police (2017) The Warwickshire Protocol 2017: Dealing with Unauthorised Encampments in Warwickshire [online] Available at:
<https://www.stratford.gov.uk/doc/206671/name/Unauthorised%20Encampments%20Protocol%202017%20Final%20Version.pdf>
- 55 Chartered Institute of Housing, De Montfort University & Joseph Rowntree Foundation (2016) Managing and delivering Gypsy and Traveller sites: negotiating conflict [pdf] Available at:

References

- <http://www.cih.org/resources/PDF/Policy%20free%20download%20pdfs/GypsyTravellerSitesDec16.pdf>
- 56** Natural England (2013) Agricultural Land Classification (ALC) system
- 57** Chartered Institute of Housing, De Montfort University & Joseph Rowntree Foundation (2016) Managing and delivering Gypsy and Traveller sites: negotiating conflict [pdf] Available at:
<http://www.cih.org/resources/PDF/Policy%20free%20download%20pdfs/GypsyTravellerSitesDec16.pdf>
- 58** Rugby Borough Council Authority Monitoring Report 2020-2021 [online] Available at:
https://www.rugby.gov.uk/downloads/file/3248/authority_monitoring_report_2020-2021
- 59** House of Commons (2022) Water Quality in Rivers [online] Available at:
<https://committees.parliament.uk/publications/8460/documents/88412/default/>
- 60** Environment Agency (2019) Classifications data for Avon Warwickshire Management Catchment [online] Available at:
<https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3007/classifications>
- 61** GOV.UK (2022) Likelihood of flooding in this area [online] Available at:
<https://flood-map-for-planning.service.gov.uk/confirm-location?easting=451223&northing=275907&placeOrPostcode=rugby>
- 62** URS (2013) Stratford-on-Avon DC, Warwickshire CC, North Warwickshire BC & Rugby BC Level 1 SFRA Report [online] Available at:
https://www.rugby.gov.uk/downloads/file/84/strategic_flood_risk_assessment
- 63** Gov.uk (2021) Flood Risk and coastal change - Table 2: Flood risk vulnerability classification [online] Available at:
<https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-2-Flood-Risk-Vulnerability-Classification>

Report produced by LUC

Report produced by LUC

Bristol

12th Floor, Colston Tower, Colston Street, Bristol BS1 4XE
0117 929 1997
bristol@landuse.co.uk

Cardiff

16A, 15th Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 032 9006
cardiff@landuse.co.uk

Edinburgh

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 202 1616
edinburgh@landuse.co.uk

Glasgow

37 Otago Street, Glasgow G12 8JJ
0141 334 9595
glasgow@landuse.co.uk

London

250 Waterloo Road, London SE1 8RD
020 7383 5784
london@landuse.co.uk

Manchester

6th Floor, 55 King Street, Manchester M2 4LQ
0161 537 5960
manchester@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment
Development Planning / Urban Design & Masterplanning
Environmental Impact Assessment / Landscape Planning & Assessment
Landscape Management / Ecology / Historic Environment / GIS & Visualisation