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27	Vivien Burdon	1257921	SA Framework	Appendix A	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					No 1 Climate Change Mitigation- The WBL Greenway supports the indicators that are proposed but would wish to see the definition of Access to Sustainable Transport widened beyond rail and bus to include Active Travel Routes No 3 Biodiversity and geodiversity- Indicators should include number of miles of new Greenways No 8 Health and Wellbeing- Within the decision making criteria it is proposed that a decision would encourage healthy lifestyles - an indicator for this therefore should include number of people within 600m of an Active Travel corridor, cycle routes or ProW network No 9 Cultural Heritage - Indicators should recognise that disused rail lines are heritage assets and should be protected No. 10. Transport and Accessibility- These indicators reflect the Development Plan's systematic refusal to recognise the benefits and need to encourage active travel whether walking or cycling.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
28	Vivien Burdon	1257921	B.4.8.3	Appendix B	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					WBL Greenway CIC notes that it is anticipated that pavements and additional pedestrian and cycle routes would be provided as part of this new development (Lower Broadheath strategic site refers) which would be expected to encourage active travel with benefits to mental and physical well being. The WBL Greenway CIC would welcome consideration of ensuring a link between the site to the proposed WBL Greenway, this would enhance further the scope of active travel and provide access to residents to the wider countryside and other tourist attractions along its route.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
29	Vivien Burdon	1257921	Para B.4.10.3	Appendix B	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					The WBL greenway CIC notes and supports the expectation that development at this strategic location would be accompanied by enhanced footpaths and cycle routes. Being close to the A44 and the Rushwick Strategic Location (which is the gateway to the proposed WBL Greenway / Active travel corridor) it would be beneficial to include in the plans for the development cycle and walking links to the proposed station at Rushwick and the proposed employment sites there and the WBL Greenway. This would enhance all residents' access to the countryside and provide for active travel commuter options.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
30	Vivien Burdon	1257921	Para B.6.8.3	Appendix B	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					The WBL Greenway CIC notes that there are footpath providing links to Worcester and the countryside. In addition that there is a cycle path adjacent to the Strategic Location along the A4440. The CIC also supports the expected provision of additional pedestrian and cycle routes as part of the development, which are expected to encourage active travel with benefits to mental and physical wellbeing, as well as facilitating sustainable access to local services. The WBL Greenway CIC considers that the Proposed WBL Greenway linking Worcester, Bromyard and Leominster along the line of the disused railway starts at Rushwick which would therefore act as a gateway to this Active Travel route and be an essential element in Supporting SA Objective * - Health and Wellbeing. The WBL Greenway CIC considers therefore that this route should be included within the list in Bullet Point I. of Policy SWDPR Strategic Transport Links which seeks to safeguard from development that would prejudice sustainable transport network developments.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
31	Vivien Burdon	1257921	B.10.3	Appendix B	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					The WBL Greenway CIC notes that there are footpath providing links to Worcester and the surrounding countryside. The CIC also supports the expected provision of additional bus, pedestrian and cycle routes as part of the new development, which are expected to encourage active travel with benefits to mental and physical wellbeing, as well as facilitating sustainable access to local services. The WBL Greenway CIC considers that the Proposed WBL Greenway linking Worcester, Bromyard and Leominster along the line of the disused railway starts at Rushwick which would therefore act as a gateway to this Active Travel route and be an essential element in Supporting SA Objective * - Health and Wellbeing. The WBL Greenway CIC considers therefore that this route should be included within the list in Bullet Point I. of Policy SWDPR Strategic Transport Links which seeks to safeguard from development that would prejudice sustainable transport network developments.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
32	Vivien Burdon	1257921	Para C.1.3.1	Appendix C	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					WBL Greenway supports Strategic Policy SWDPR 3 in seeking to promote sustainable transport throughout the plan area through a wide range of measures including, inter alia, improved connections to onward travel, and encouraging walking and cycling. We also note and support that this policy would be expected to improve residents' access to services and facilities, including leisure activities. Importantly the policy aims to "manage and limit single occupancy private car use in favour of incentivising cycling, walking and public transport use, as active and space efficient modes of transport". The WBL Greenway CIC considers that since Rushwick would act as a 'gateway' to the Proposed WBL Greenway linking Worcester, Bromyard and Leominster along the line of the disused railway, this Active Travel route should be an essential element of the SWDP's Strategic Transport Links policy. The WBL Greenway CIC considers therefore that this route should be included within the list of Sustainable transport network developments in Bullet Point I. of Policy SWDPR 3 Strategic Transport Links which seeks to safeguard from development that would prejudice sustainable transport network developments. This is because it would provide sustainable access to leisure activities and the wider countryside, promote health and well being and potentially result in a degree of modal shift to bicycle for people coming onto Worcester from settlements along its route.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
33		1235966		Methodology	CPE-1	Innova	1235922	CPE	Mr Phillip Corylus	Director Corylus Planning & Environmental Ltd		The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects of the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowledge) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help assess significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Sustainability appraisal and strategic environmental assessment are tools used to assess the likely effects of the plan when judged against reasonable alternatives. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council [2012], Citation Number: [2012] EWHC 2542 (Admin). The SA process for the SWDPR has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The Regulation 18 (III) consultation provides greater clarification and updates to elements of the Sustainability Appraisal evidence base work.
34	Vivien Burdon	1257921	Para C.1.7.2	Appendix C	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					WBL Greenway CIC supports Strategic Policy SWDPR 7 in seeking to promote opportunities to improve health and well being. We note that this policy would be expected to encourage physical exercise through active travel and this would be likely to benefit physical health as well as encouraging access to outdoor space. The WBL Greenway CIC considers that the Proposed WBL Greenway linking Worcester, Bromyard and Leominster along the line of the disused railway, would be an excellent active travel corridor to meet the aims of Policy SWDPR 7. In particular it would provide opportunities for beneficial active travel for, at least, the proposed residents of Lower Broadheath and Rushwick Strategic Locations. For this reason and to help the plan meet the aims of SWDPR Policy 7 - the WBL Greenway should be an essential element of the SWDP's Strategic Transport Links policy. The WBL Greenway CIC considers therefore that this route should be included within the list of Sustainable transport network developments in Bullet Point I. of Policy SWDPR 3 Strategic Transport Links which seeks to safeguard from development that would prejudice sustainable transport network developments.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
35	Vivien Burdon	1257921	Para C.1.7.4	Appendix C	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					WBL Greenway CIC supports Strategic Policy SWDPR 7 in seeking to promote opportunities to improve health and well being. We note that this policy also states that development proposals should provide "a permeable environment that promotes active travel such as walking and cycling" and that this would be expected to help improve accessibility across the Plan area. The WBL Greenway CIC considers that the Proposed WBL Greenway linking Worcester, Bromyard and Leominster along the line of the disused railway, would be an excellent active travel corridor to meet the aims of Policy SWDPR 7. In particular it would provide strategic active travel access for a large part of the western plan area and opportunities for beneficial active travel for, at least, the proposed residents of Lower Broadheath and Rushwick Strategic Locations. For this reason and to help the plan meet the aims of SWDPR Policy 7 - the WBL Greenway should be an essential element of the SWDP's Strategic Transport Links policy. The WBL Greenway CIC considers therefore that this route should be included within the list of Sustainable transport network developments in Bullet Point I. of Policy SWDPR 3 Strategic Transport Links which seeks to safeguard from development that would prejudice sustainable transport network developments.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
36	Vivien Burdon	1257921	C.2.4.3	Appendix C	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					WBL greenway CIC notes that the assessment of Policy SWDPR 1: Employment in Rural Areas finds that overall, this policy would be expected to have a minor positive impact on the local economy. We consider that creating an Active travel corridor along the line of the disused railway between Worcester and Leominster would stimulate tourism and leisure activities along the route. This in turn would help promote rural regeneration by providing opportunities for diversification for tourism, leisure and recreation uses as per the plans aims. The WBL Greenway should be promoted as an outcome of this SA of the SWDP as it would enhance many objectives of the plan. In particular the SA should recommend that the WBL Greenway should be included in Policy SWDPR 3 bullet point I. as an Active travel corridor that should be protected. In this way the SA .	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
37	Vivien Burdon	1257921	Para C.1.3	Appendix C	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					WBL Greenway supports the approach in SWDPR 3. It also notes that under Policy subsection titled "Delivering Transport Infrastructure to Support Economic Prosperity" bullet point F states that "The following transport schemes, as identified within the Worcestershire LTP4, are the most significant for the successful implementation of the SWDPR. Active travel corridor and network enhancement". It is noted that elsewhere in the SA it has been recommended that the WBL Greenway supports the recommendation in Table 4.3 SA 10: Access to sustainable Transport options which states that design codes and policies should ensure development proposals consider the recommendations of the National Cycle Strategy. In addition the first bullet point of SAR Health and Well Being - Access to natural and outdoor space, the SA states that consideration should be given to the findings of the Rights of Way Improvement Plan. In particular we support the recommendation that an update to this Plan is prepared alongside LTP4. The WBL Greenway CIC considers that these reviews should be carried out expeditiously, and we would wish to engage actively in the updates of these plans with a view to adopting the WBL Greenway proposal and incorporating it in the List of Active Travel Corridors that will be supported in Policy SWDPR 3.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
38	Vivien Burdon	1257921	Para C.3.9	Appendix C	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					WBL Greenway CIC supports policy SWDPR 20: Replacement Dwellings in the Open Countryside bullet point iv, which makes provision for the "replacement of existing dwellings on the existing footprint unless there is a better position for visual, landscape, highways safety, environmental or other public gain grounds to justify an alternative location within the curtilage". This would be particularly supported if such a request to relocate resulted in a removal of hindrance to the proposed WBL Greenway route along the disused railway line since this would be a public gain in the spirit of the Policy.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
39	Vivien Burdon	1257921	B Health	Appendix F	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					WBL Greenway CIC agrees that the issue of the impact on development on "limited access to ProW or cycle network" would be mitigated by SWDPR policies 7, 10 and 25. Any proposals that enhance that provision of ProW and cycle network must therefore also be encouraged. WBL Greenway CIC considers that the proposals for the WBL Greenway would enhance these mitigating effects.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
40	Vivien Burdon	1257921	10 Transport	Appendix F	Vivien Burdon	Worcester, Bromyard Leominster Community Interest Company					WBL Greenway CIC agrees that the issue of the impact of restricted or "limited access to ProW or cycle network" of development would be mitigated by SWDPR policies 3, 7, 10 and 25. Any proposals that enhance that provision of ProW and cycle network must therefore also be encouraged. WBL Greenway CIC considers that the proposals for the WBL Greenway would enhance these mitigating effects.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
41	Mr and Mrs Roger and Linda Perkins	1269055	Para 2.11	Appendix A	RandlPerkins						Flooding as a result of development in rural areas where green field land and fields are being concreted over needs to be carefully assessed. New housing developments have caused raw sewage flooding problems. SWDPR 2 states that the openness of greenbelt and significant gaps are important. Urbanisation of the countryside should not be allowed to happen for sustainability of climate change adaptation reasons.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
42	Mr and Mrs Roger and Linda Perkins	1269055	2.12	Introduction	RandlPerkins						Permanent damage to local wildlife and their habitats is irreversible and unsustainable, so needs to be looked at carefully in rural locations.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
43	Mr and Mrs Roger and Linda Perkins	1269055	2.13	Appendix A	RandlPerkins						There is a great need to protect and enhance the character of a rural landscape to maintain its distinctiveness. Landscape destruction does not have a minor negative impact. Rural developments should be small, in keeping with their surroundings and use locally sourced materials. In the cases of all our recent new developments, landscape has not been destroyed, development has not been in keeping with the surroundings and locally sourced materials have not been used. The rural landscape looks exactly the same as other developments in urban areas with wholesale corporate materials not made locally. This does not fit with the sustainability agenda. SWDPR 43 states we must protect existing green space from development unless there is a demonstrated community need for the development. This is certainly the case in rural locations where a 'community need' is demonstrated by developers with 'confidential' documents and then when the development is built, no 'community need' people live in the built development. It is a practice which needs to be stopped and does not contribute anything to the sustainability agenda.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
44	Mr and Mrs Roger and Linda Perkins	1269055	2.14	Appendix A	RandlPerkins						Road traffic in rural areas because of development will increase air and noise pollution which is not good for any sustainability agenda including energy consumption. Increased waste is often not a priority on rural development sites and is not managed well. Poor waste management from new developments can result in sewage problems. Increased travel to work raises pollution issues. There is a major impact of 100 dwellings on local air pollution, so developers often build 99 houses to avoid this clause (only one house short of new regulations). Ground water and water courses are often not seen as important and when the development is built, but the community is left to deal with the problem of excess water. The increase of waste of 1% and more is often overlooked and is a major negative and the community is left to deal with the problems.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.



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64	Mrs Katharine Harris	1270655		Methodology	katharine24						CFS0407sc and CFS0905sc have each been treated as single developments. The cumulative impacts of 360 extra houses, which will cause significant problems to the road network, should have been assessed. Air quality will be considerably worse and the air quality monitoring point must be on the main road, not on side roads. The Sustainability Report refers to benefits for a site end user; what benefits are there for the current residents? The SA does not mention the impact of CFS0407sc and CFS0905sc on the setting of the AONB. They would have a significant detrimental impact on the views from the Hills and on the key view from the Guarrford road to the Hills. It is the Commons that help to give the Hills their setting and context. Without the Commons, the value of the Hills are diminished. No amount of mitigation measures can make up for the loss of open countryside or indeed prevent a significant impact on the setting of the AONB. The findings of the AONB Environs Report are not mentioned or referred to in the SA. The impact magnitude measure in the SA (p.18) is on a rather simplistic 3-point scale, rather than on the more usual 5 point scale, which allows for a much more realistic assessment of the potential impact on the locality of such developments. Local designations eg. LWS haven't been considered in the SA.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. Sites subject to criteria such as being located in areas subject to high levels of flood risk are ruled out at an earlier stage in the SHELA process and do not progress as reasonable alternatives in the SA. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
65	Mr Christopher Mowbray	1240965	Paragraph D3.2.2 Paragraph D3.4.6 Paragraph D3.4.10 Paragraph D3.4.11 Paragraph D3.4.12 Paragraph D3.4.13 Paragraph D3.6.2	Appendix D	cmowbr@aol.com						The below has direct relevance to CFS0630sc. Paragraph D3.2.2 - the major negative impact on pluvial flooding risk for houses built on this land. Paragraph D3.4.6 - the loss of pastoral land and hedgerows. Paragraph D3.4.10 - a 'minor negative' of the impact on the landscape character. It could be argued that this would actually be a major impact due to the loss of green space for residents and walkers and the visual and noise impact on nearby residents. Paragraph D3.4.11 - impact on the users of footpaths and on the landscape. Paragraph D3.4.12 - impact on the views for residents. Paragraph D3.4.13 - Contribution towards urban sprawl and a 'minor negative impact' on the local landscape. Again, it could be argued that it would be a major impact particularly as it could very likely lead to further expansion of housing. There have been on-site inspections carried out by surveyors, (presumably on behalf of the land owners), which seem to be looking at the possibility of extending the housing right across the field and driving a major new road to serve the development into the village by a different route across virgin countryside and over a new bridge to be built across the nearby canal. The eventual intention is clearly to turn the original development of 26 units into a sprawl of several hundred houses. Paragraph D3.6.2 - This site has historic significance as the site has fruit orchards owned by Lea and Perrins to produce the vinegar they needed for the manufacture of Worcestershire Sauce.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
66	Mr Adrian M Darby	1270902	3.4 Identifying the best performing option.	Strategic Locations	ad@kemerton.com						Made comments on this appraisal when this report was discussed at JAP, and pointed out errors in relation to Mitton. However there are also flaws in the methodology used. This was to rank the pre-identified sites over a series of criteria and then to add the scores to provide an overall ranking. This had two consequences. (i)It meant that each site was being judged against all the others, whereas the relevant comparison would have been with other sites that would have been realistic alternatives i.e. those providing for the same population, presumably lying in the same local authority or close to the border between two of them. (ii)It also meant that each SA objective was given equal weight, whereas most people would not necessarily accept that this was the case. Moreover because the size of the sites was taken as given and set as a minimum of 1000 dwellings, it was not possible to consider a site of a different magnitude. This was particularly relevant in the case of Mitton, where half of the dwellings are provided to satisfy Tewkesbury Borough's needs under the duty to co-operate whereas the remaining allocation of 500 dwellings is to provide for the needs of Wychavon. Therefore the appraisal should have examined the sustainability of the two parts separately and might have come to very different conclusions in relation to the northern (Wychavon) section.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowledge) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work.
67	Mrs Lynn STEWART	1270904	All	Strategic Locations	Stoulton Parish Council						This is a duplicate rep of 68	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowledge) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA methodology (see Chapter 2 of the R18(III) SA Report) identifies six scoring categories. There is no legislative basis for the scoring protocol. Scores with symbols are used to provide rapid snapshot summaries of sustainability performance. They should never be read alone and always read with the narrative interpretation of the scores that is provided in the SA report. The uncertain category is used to indicate that it is entirely uncertain whether impacts would be positive or adverse; they may both exist but cannot be tangibly determined at the high level of assessment that forms the cornerstone of the SEA process. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The effects of the Covid 19 Pandemic remain unclear. The SA process has been prepared using best available information at the time of writing. There is no available evidence from the pandemic to inform the preparation of the SA report. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
68	Mrs Lynn STEWART	1270904	All	Site Assessments	Stoulton Parish Council						The SA is flawed, wrongly scored and incorrect in a number of ways. There is already a train service from Pershore and Evesham into Worcester and it is never busy why therefore are people from new development going to be using the service when others currently do not? The use of Parkway is low which is presumably partly due to Covid and to what degree there will be any uptake in rail use, yet the station is the single most important factor in the siting of this proposed development. The Plan puts an undue and unrealistic emphasis on rail transport and ignores post Covid work and leisure travel patterns. The Parkway scoring is unsound, subjective and biased with the scores not weighted in any way. Some objectives are more impacting than others but the SA doesn't consider this and the report needs rewriting. The SA fails to measure the impact one proposed development may have on another proposed development. 17 of the M5 is already busy and an extra 43,000 people by 2041 will all access the motorway from here. The S.A. has failed to consider other sites within the SWDP area, all which would ease the congestion in this one area. Only Hanley Castle, Strensham, Milton and Hinton on the Green use alternative road networks avoiding J6 and J7 of the M5. Yet of these 4 locations 3 are prioritised in the bottom 4 of all sites. The S.A. is incorrect in the way it has scored highway issues. The S.A. fails to consider how other less prioritised sites could be made more sustainable for example by reducing the size of Hinton on the Green. This reduction has not been considered and building away from Worcester would relieve the pressure on M5 and surrounding areas. The impact on the surrounding villages will be catastrophic.  We support a proper garden community but one based on the reality of normal car ownership. All independent and pro housing research of Garden Towns indicates that these new towns become car based commuter estates. Putting 12,000 people at Parkway in the middle of rural Worcestershire and then saying there will be few cars because this is a garden community town indicates complete lack of knowledge. All the land within the Parkway proposal is within either Grade 2 or Grade 3 agricultural land and the UK needs to grow more of its own food. Worcester Hospital is operating beyond capacity and a new town will worsen this. Scoring Parkway highly against the criteria of Health and Wellbeing because it is only 1.7 km from an over capacity hospital is only a theoretical positive impact, the reality is very different and indicates a total lack of local understanding.  The rail based strategy is flawed as it assumes that peoples places of work and leisure are easily reached by existing or future train lines. That is unlikely to be true now and even less so in the future. The landscape scoring for Parkway is completely arbitrary backed up by sweeping statements that should be applied to all proposals. There are also inconsistencies with how Hanley Castle site and Parkway have been scored showing he scoring and narrative are inconsistent, flawed, subjective and biased in promoting Parkway whilst pretending to be a scientific analysis. Parkway inevitably scores one of the highest in this Biodiversity/geodiversity. If there is no difference why is Parkway not scored the lowest?  Climate Change Mitigation: The amount of Co2 emissions produced by Parkway will be the highest and this is played down. One of the reasons Parkway scores well is because of the proposed solar farm but why not put solar farms in all locations? Parkway has at every turn in this report been projected as the ideal location irrespective of the reality resulting in erroneous and biased scoring as indicated in the many examples above. Parkway will be nothing more than a suburb of Worcester separated solely by the M5 motorway and the additional urban sprawl will destroy 612 hectares of best and more versatile land yet these factors hardly raise a mention. In our opinion this S.A. report is subjective to fit the planners' narrative and flawed at its core and consequently invalid.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. 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The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The effects of the Covid 19 Pandemic remain unclear. The SA process has been prepared using best available information at the time of writing. There is no available evidence from the pandemic to inform the preparation of the SA report. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
69	Mrs Helen Oldham	1270487	Box 2.1	Methodology	Helen Oldham						Omission in calculation of carbon emissions - non-residential emissions are not included. Given that Wychavon has a large percentage of employment area, this makes the carbon calculations inaccurate. Wychavon aims to halve its carbon emissions by 2030 (ref. Methodology 1) How can Wychavon plan for this, never mind achieve it in reality, if the carbon emissions have been omitted at planning stage? Also any renewable energy production in employment areas is not factored in to calculations, which is a disincentive to plan in renewables in an area which has massive potential for solar arrays and air source heat pumps. Stating that "Development proposals which include the generation or use of renewable energy would be likely to have a positive impact on climate change mitigation, or offset identified negative impacts to some extent." is a 'truism'; it cannot be argued with, but is based on assumptions and generalisations, not specific proposals or even estimates to carbon emission calculation. This style of writing is repeated throughout the report, which is fundamentally lacking in data and specific proposals, but is based on the second hand data provided by councils or taken from the internet, rather than first hand data collection. The report is also full of generalised statements which could apply to any site, and assumptions such as if people have employment land nearby, they will get a job locally, thereby reducing commuting miles.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
70	Mrs Helen Oldham	1270487	1.3.6	Introduction	Helen Oldham						"Public consultation is an important aspect of the integrated SA/SEA process" If this is really the case, the consultation has been presented and carried out in an extremely wordy, tricky to access for a lot of people, manner. There will be many residents for whom this process has been off-putting and inaccessible. As such it will have been an extremely expensive tick box exercise, to say that the public have had their opportunity to respond. This lack of proper communication with and learning from the community means that valuable local insights will be missed, making any development less appropriate to the area. It is also likely to mean that the feelings of resentment and anger of locals will be increased because of the insensitive and inappropriate nature of this development to the local communities and natural environment, and its wider effects on climate change and inability of local councils to attain their climate change targets.	Comments noted.
71	Mrs Helen Oldham	1270487	Box 2.2	Methodology	Helen Oldham						Increased pluvial flooding is assumed in these proposed new housing developments. The SWDP area already experiences significant pluvial and more significantly fluvial flooding. Any extra building will increase pluvial flooding risk. As the area's water courses are already frequently overwhelmed, additional development of land adjacent to or on flood plains, will significantly affect flooding risk. I can find no reference to increased flooding risk down stream such as where the A4104 passes through the flood plain area from the river Avon, just to the south west of Pershore and the proposed new housing estates near Tidesley Wood. From this area, the flood waters drain rapidly towards Tewkesbury which already lives with considerable flood risk. With the proposed CEE Bill and upcoming environmental legislation where the polluter pays, it may not be long before developers who build on land where it is known that flood risk will increase markedly, will be liable for the increased flooding that occurs following development.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.

A	B	C	D	E	F	G	H	I	J	K	L	M	
65	72	Mr Adrian M Darby	1270902	3.3.18	Strategic Locations	ad@kemerton.com						<p>This judgement on the landscape impact of development at Mitton fails to take account of views from the summit of Bredon Hill, which lies at its western end, and from its lower SW slopes, all in the Cotswolds AONB. The footpaths on this corner of the hill are exceptionally well used, and the tower of Tewkesbury Abbey is a key feature in this view. While the abbey would not be hidden by development at Mitton its prominence would draw the viewer's eye to the new development. The tower on the summit of Bredon is the focal point of a very large number of tourist visits and it is most important to safeguard the landscape which visitors enjoy over both Mitton and Strensham.</p>	<p>The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work.</p>
66	73	Mr Adrian M Darby	1270902	3.3.27	Strategic Locations	ad@kemerton.com						<p>Is not happy giving so much weight to Grade 3a agricultural land rather than Mineral Safe Guarding Area. It is argued that Throckmorton scores better than Mitton because it is all Grade 3a land or better while it has no MSA. However inspection of the West Midlands Region 1250 000 Series Agricultural Land Classification Map, which does not differentiate between Grade 3a and Grade 3b, shows that Throckmorton contains no Grade 2 or Grade 1 land, whereas the north eastern section of Mitton is shown to be grade 2. The interactive map attached to the Worcestershire Emerging Minerals Local Plan shows that Mitton has an area of Mineral Safeguarding Area, while Throckmorton has none. Therefore if one uses the criteria of Grade 2 (very good) agricultural land and protection of MSA Mitton is shown to be less sustainable than Throckmorton on both counts.</p>	<p>The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work.</p>
67	74	Mr Adrian M Darby	1270902	3.3.16	Strategic Locations	ad@kemerton.com						<p>This paragraph fails to take account of the fact that Strensham is immediately adjacent to Upham Meadow and Summer Leasow SSSI, which is the most important site for breeding curlew in the Severn and Avon Vale. It is also the nearest strategic location to that part of the Bredon Hill Strategic Area of Conservation, in which the Violet Click Beetle for which this SAC is designated, has actually been recorded. It therefore is less sustainable than Hinton on the Green and should be ranked accordingly.</p>	<p>The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work.</p>
68	75	Mr Michael Huskinson	1270930		Methodology	MHuskinson3002						<p>Sites CF50407c and CF50905c ('the Sites') have each been treated as single developments with their impact on the locality being considered individually instead of looking at the cumulative effect of these two developments within a quarter of a mile of each other which is so important. The cumulative impact of 360 extra houses in the area and the resultant vast increase in traffic will cause very significant problems for the current road network. The Sustainability Appraisal (SA) does not mention the impact of the Sites on the setting of the AONB, as seen from Worcestershire Beacon. They would have a significant detrimental impact on the views from the Hills showing marked and extended urbanisation. There would be a significant negative impact too on the iconic view from the Guifford Road to the Hills, valued greatly by local persons and visitors alike. It is the Commons that help to give the Hills their setting and context. Without the Commons the value of the Hills is diminished. No amount of mitigation measures can make up for the loss of open countryside or indeed prevent a significant impact on the setting of the AONB. The findings of the AONB Envisors Report are not mentioned or referred to in the SA. The impact magnitude measure in the SA is on a rather simplistic 3-point scale, rather than on the more usual 5 point scale, which allows for a much more realistic assessment of the potential impact on the locality of such developments. The air quality due to increased traffic pollution would be considerably negatively affected. The air quality monitoring point must be on the main road if it is accurately to reflect changes in air quality. It is understood that in the Guifford Road area the air monitoring point is on a quiet residential road some distance from the main road. The Sustainability Report refers to benefits for 'site end users'; what benefits are there for the current residents? Local designations eg. Local Wildlife Site(LWS) do not seem to have been considered in the SA.</p>	<p>Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. Sites subject to criteria such as being located in areas subject to high levels of flood risk are ruled out at an earlier stage in the SHELAA process and do not progress as reasonable alternatives in the SA. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>
69	76	Cllr Margaret Rowley	1190548	TABLE F.1.1	Appendix F	amrowley	Vice Chair Tibberton Parish Council					<p>Para 1. admits the mitigation policies will not fully mitigate the increased carbon emissions expected, and yet where individual developments are mentioned the increase is 'negligible'. This seems disingenuous as all the 'negligibles' will add up to something significant</p>	<p>The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The cumulative effects assessment process is quite different to the assessment of single sites or locations alone. The thresholds used in the SA methodology to guide the scoring process have been prepared for the assessment of significance at sites alone. Cumulative effects are considered in terms of total effects at the plan level for the respective SEA topics. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>
70	77	Mrs Helen Oldham	1270487	3.3.10	Strategic Locations	Helen Oldham						<p>Even if the development areas have very efficient SUDS schemes so that there is no increase in flooding risk over the current green field site, there is still the difference in impact between a field being flooded for a week and a housing estate being flooded for a week. Potential residents need to be warned about the flooding risk before they commit to live there. Any increase in drainage will result in more flooding downstream. If the CEE Bill becomes law, polluters will have to pay. So if a developer knowingly increases flood risk they may well be liable for the damage caused. Tewkesbury is downstream of all these building sites.</p>	<p>Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>
71	78	Mrs Helen Oldham	1270487	3.3.25	Strategic Locations	Helen Oldham						<p>The use of agricultural land ALC 1.2 and 3, for development is shocking. In ten years time we will wonder why we considered it better to have a housing estate than a productive field. This sustainability report has not taken into account the change in our society over the last year, now that more people are working more from home and many offices in Worcester are underused or redundant. Some enterprising people are converting a few of them. This will relieve the housing situation in Worcester to some extent and reduce the demand for new housing. These houses could be build and then only sold at a reduced price due to a drop in demand.</p>	<p>Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>
72	79	Mrs Helen Oldham	1270487	3.3.30	Strategic Locations	Helen Oldham						<p>The demographics of our country have changed radically in the last few years. If the assumptions of housing need are based on 2014 population data and projections they will be incorrect. Since then we have left the EU and had a pandemic. These have changed not only the numbers of people, but their needs. With office buildings being empty or underused now, they could and are being converted into accommodation. All these factors decrease demand for new housing.</p>	<p>Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>
73	80	Mrs Helen Oldham	1270487	3.3.34	Strategic Locations	Helen Oldham						<p>The latest cqc report on Worcester Royal Hospital 19/2/21 said that it required improvement and urgent and emergency services were inadequate. To justify building housing because the residents would receive health care from an already struggling hospital does not make sense.</p>	<p>Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>
74	81	Mrs Helen Oldham	1270487	3.6.7	Strategic Locations	Helen Oldham						<p>The proximity of Throckmorton to the community of Pershore means that Pershore will be heavily impacted - traffic, pollution, merging of communities, pressure on facilities eg the railway station car park is tiny, loss of community identity, increase in flooding as Pershore is downstream of Throckmorton. Where are the calculations to support the statement that the entire community would be powered by renewable energy, especially with the increase in EVs?</p>	<p>The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites.</p>
75	82	Cllr Margaret Rowley	1190548	F.1.1	Appendix F	amrowley	Vice Chair Tibberton Parish Council					<p>Climate Change Adaptation: Risk of fluvial or surface water flooding. In the descriptions of the various developments in relation to fluvial flooding it is assumed that as long as the site itself does not flood, then there are no problems. The preferred site in Himbleton for example does not itself flood, but the road immediately to the SE of the site is regularly flooded cutting off access to local facilities. Other sites currently affected by surface water flooding, such as the preferred site CF50529 ( table G.1.1) do not appear to take the problem into account.</p>	<p>Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>
76	83	Mrs Helen Oldham	1270487	Box 5.2	Site Assessments	Helen Oldham						<p>The major negative impact on bio and geo diversity noted about the land at Orchard Farm CF50350c because of its proximity to the ancient woodland Tiddesley Wood (see D.3.3.2), is not noted on the impact matrix 5.2. It is down as a minor impact only. This means that the land at Orchard Farm should have 5 major negative impacts, more than any of the other sites.</p>	<p>The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>





A	B	C	D	E	F	G	H	I	J	K	L	M
105	Various Land Owners	1249684		Methodology	tony@harrisstrategicland.com	Harris Strategic Land Ltd	1249682	Philip Rawle/PDRPI	Philip Rawle	PDR Planning	The representations relate to the strategic locations and in particular west of Worcester West ad shows how the site is an acceptable strategic location for the urban extension west of Worcester. Objective 1 - This scoring would apply to any large urban extension. This strategic location is accessible by a range of transport methods, including pedestrian and links to public transport. Objective 2 - Worcestershire County Council require an e metre easement for all watercourses and all developments and SuDS would be kept out of this zone. Objective 3 - There is the opportunity to create a 50ha Country Park. The landscape, nature conservation and amenity value and potential for the Laughem Brook has already been recognised by Worcestershire County Council, Natural England, the EA, Worcs Wildlife Trust and English Heritage. It is envisaged development of the site would have a neutral impact on biodiversity and geodiversity. Objective 4 - The site is considered typical of its landscape type and has a number of urban influences. Objective 5 - This scoring would apply to any large urban extension. The site can be developed to keep development away from the A443 in the north east corner. All development and SuDS would be kept away from Laughem Brook. Objective 6 - This scoring would apply to any large urban extension and only Grade 3a land is BMV. There is also minerals safeguarding in the area and any application conditioned to ensure minerals assessment. A major negative impact is not considered justified. Objective 7 - The site has the capacity to deliver 1,000 dwellings over the plan period. Objective 8 - The HSL land can accommodate a 50ha Country Park. Objective 9 - No heritage assets are impacted by HSL land interests. Objective 10 - There would need to be improvements to local roads to accommodate 1,000 dwellings on HSL land and any negative transport impact could be mitigated against. Objective 11 - A major positive to education is agreed and a primary school would be provided. Objective 12 - A major positive to the economy and employment is agreed with 5ha of employment land provided under SWDP45/2 to be provided.	Comments Noted. The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDRP, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDRP plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
106	G D Crow	1238658		Site Assessments	G D Crow	Chairman Hampton Lovett and Westwood Parish Council					Highlighted concerns with CF50501 and CF50502 in 2019 and how it would negatively impact the community, heritage assets and that adjacent developments had been dismissed at appeal. We consider the alternative sites submitted to the Preferred Options should be subject to SA as reasonable alternatives. The Parish Council have submitted a parcel of land and this will also provide green space. There are accessibility hazards for CF50501 and CF50502 where the cost needs to be taken into account and will depend on what needs doing to the A442. To develop these sites without the required infrastructure upgrade to the A442 could leave to more accidents.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
107	Rod Wood	1235663		Methodology	RodWood						2.19 CF50880 is initially graded correctly as having a major negative impact in this category, failing in every single category. However magically after applying mitigation from F7 this ridiculous location manages a minor negative. This appraisal is farcical, the only way to achieve this regrade would be to create a very significant and costly change to the local road network. If this is reasonable then every single site assessed by this Appraisal process would be graded as suitable for development with respect to Transport and Accessibility. Furthermore within the Appraisal SWDP49/3 and 51/3 have been rejected despite having a vastly more suitable access to the road network if mitigation along the lines necessary for Strensham CF50880 were applied. The appraisal is consequently inconsistent. Section 2.14 Pollution and Waste defines any employment site of greater than 10ha as having a major negative impact, and yet CF50880 has been regraded in Table 5.3 as having a minor impact. Nowhere is any justification for this change made, and none of the mitigations apply within the Mitigation Draft Policy in F.1. Furthermore even if they did, it could not override the definition in Section 2.14 other than by making the Industrial Park smaller. Therefore the appraisal for CF50880 within Table 5.3 is factually incorrect with respect to Pollution and Waste.	The SA methodology (see Chapter 2 of the R18(III) SA Report) identifies six scoring categories. There is no legislative basis for the scoring protocol. Scores with symbols are used to provide rapid snapshot summaries of sustainability performance. They should never be read alone and always read with the narrative interpretation of the scores that is provided in the SA report. The uncertain category is used to indicate that it is entirely uncertain whether impacts would be positive or adverse; they may both exist but cannot be tangibly determined at the high level of assessment that forms the cornerstone of the SEA process. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
108	Rod Wood	1235663		Site Assessments	RodWood						5.2 and 5.3 The report is inaccurate because it has not considered the existence of the Historic Park of Strensham Court. Today this Park is listed on the Wychovan website within the Wychovan Historic Parks and Gardens SPD. A Planning Inspector as recently as 2010 supported the value of the Park from both a cultural heritage and landscape viewpoint. CF50880 is positioned 50% on the Park land and 50% adjacent to the Parkland. The consequent impact matrices are therefore incorrect. I am however even more concerned that although this impact and mistake had been notified to the SWDP consultation previously with at least 66 comments having been entered within the SWDP reports as well as directly to the Planning Department, this error has persisted.	Comments noted. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
109		605640		Appendix B	William Davis (Define)	William Davis	537823	Define	Mr Mark Rose	Director Define Planning & Design Ltd	The approach taken in relation to the identification of strategic locations is appropriate and justified, particularly at Rushwick however CF50692 is a sustainable location and can contribute to the Rushwick Strategic expansion as the Concept Plan fails to take account of the highway and drainage infrastructure required and as such more land is needed. The Concept Plan as a result must be revisited.	Comments Noted. The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDRP, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDRP plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
110		605640		Methodology	William Davis (Define)	William Davis	537823	Define	Mr Mark Rose	Director Define Planning & Design Ltd	In relation to Objective 4, detailed emerging proposals for an individual site should be taken into consideration when assessing against SA Objectives. For the SA to accurately reflect the actual sustainability impact of proposals, it is important that the inputs are up to date and that these inputs are taken in context and mitigation is taken into account. Critically the SA must reflect discordance with the Landscape Character Assessment. The assessment of the perceived impact of urban sprawl / coalescence that the inputs within Box 2.4 are complex and interconnected and illustrates the importance of considering proposed mitigation. The SA must consider the parcel in its context, reflect the interconnect impact of other inputs and the effectiveness of mitigation measures. The SA has failed to do this for some sites such as CF50691 where the application of the methodology is not clear as there is a suggestion that there would be a high landscape impact and it is not clear how this could be. A robust analysis within the submitted vision document explains how the site would not have a high landscape impact. On other sites such as CF53506, allowances have been made for sensitive design and mitigation to deal with landscape sensitive areas and these sites have been selected as a result. The SA is clearly inconsistent and this undermines the soundness of an important part of evidence base.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
111		605640		Introduction	William Davis (Define)	William Davis	537823	Define	Mr Mark Rose	Director Define Planning & Design Ltd	Each reasonable alternative should be afforded the same level of assessment to ensure consistency and transparency both in the methodology of the SA and identification of sites. This hasn't been done as there is no detailed analysis for rejected sites. The assessment of CF50689 is limited and it would be useful to understand the various matters to assist in the promotion of the site. Equally, assessments of the rejected sites such as CF50242 must be made available. This is a sustainable site in a sustainable character. SWDRP10 doesn't reference strategic development proposal within the plan delivering centres to serve those communities and it should do. Support is given to the minor positive impact on the transport and accessibility as a result of SWDRP12 and in particular C.3.1.4. SWDRP14 needs to be realistic to commercial realities as this can cause significant delays when left to development management process.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
112		1196698	G1.1	Appendix G	Hallam Land Management Limited	Hallam Land Management Ltd	1196697	Francesca Parmenter at David Lock	Ms Francesca Parmenter	Senior Associate David Lock Associates	Supports the inclusion of land at Cales Farm CF50482 and is committed to delivering a landscape-led approach to the masterplanning of the site. Development impacts, including those in relation to landscape are explicitly considered and addressed through the development management process. An ecological survey has been undertaken to identify an appropriate strategy for reducing impacts on the Malvern Hills SSSI and local wildlife sites.	Comments noted. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
113	Trustees The Spetchley Estate	1233174		Appendix C	the spetchley estate	The Spetchley Estate	1233173	Geraint Jones Savills	Mr Geraint Jones	Savills (UK) Ltd	Specific support is given to SWDRP2 C.1.2.1. The WPNSA Transport Vision is in line with SWDRP3. This policy should reference Manual for Streets criteria. Generally supports SWDRP5 but can't support reference to the protection of a historic assets landscape or townscape character. SWDRP10 doesn't reference strategic development proposal within the plan delivering centres to serve those communities and it should do. Support is given to the minor positive impact on the transport and accessibility as a result of SWDRP12 and in particular C.3.1.4. SWDRP14 needs to be realistic to commercial realities as this can cause significant delays when left to development management process.	Comments noted. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
114	Trustees The Spetchley Estate	1233174		Methodology	the spetchley estate	The Spetchley Estate	1233173	Geraint Jones Savills	Mr Geraint Jones	Savills (UK) Ltd	Generally supports the process and methodology of the SA and that it takes a balanced approach across a series of technical objectives and supports the conclusions that the WPNSA is the highest scoring strategic location as it is close to a railway station, 17 and pedestrian and cycle routes. The SWCs must ensure the identification of the 3 strategic locations are based on a proportionate level of evidence which has also been used to assess the 6 alternative strategic sites. Objective 1 Advice removal of 2.1 due to the emergence of Net Zero proposals. Objective 2 Climate change is only assessed solely on fluvial and pluvial flood risk. Climate Change is far more wide ranging than this which aren't considered. SuDS features for surface water management will be fully integrated into the Estates proposals. Concurs that a negligible result of flood risk will occur due to Parkway development. Objective 3 Support the SL ranking for the WPNSA but further information is needed. Reports detailing the baseline habitat data across the WPNSA is being produced and this will supplement the SA evidence base. The estate acknowledges there would be an adverse impact to biodiversity, the delivery of biodiversity net gain ensures overall ecological enhancement. The estate therefore supports the SA findings that 40% GI requirement across the WP allocation could help contribute toward maintaining habitat connectivity and enhancement and the WPNSAs score should be altered to minor positive. As part of the recommendations for improvements to the SWDRP, Table 4.3 should consider including a biodiversity net gain target. It is difficult to assess the impacts of future development on individual trees and a better understanding could be achieved by the review of masterplans. Objective 4 Supports the ranking for WPNSA and that landscape mitigation is needed through design and SLVA. Objective 5 The SA should consider the role of Worcestershire Parkway rail station within the context of reducing pollution. The landowners at WP are exploring suitable level of internalisation across WPSN to reduce local trips. Objective 7 Supports the WPNSAs score for this objective. Objective 8 Supports the RPNAs ranking for this objective. It should be added that the Concept Plan seeks to promote active lifestyles through active travel routes and GI corridors. Objective 9 Supports the statement within paragraph B.9.4 Future development on the estates land parcel will be sensitively designed and will have a appreciation of heritage assets in the surrounding area. Objective 10 It is not clear how distances to rail and bus provision has been measured. Moreover the use of public transport is often based on convenience and the quality of access route. The SA should acknowledge both of these. The estate supports the SL ranking for this Objective. Objective 11 Supports the identification that access to education across the WPNSA will result in a major positive impact and land will be safeguarded for a primary school. Objective 12 Supports the ranking for this Objective and agrees with B.9.12.2.	Comments noted. The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDRP, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDRP plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The cumulative effects assessment process is quite different to the assessment of single sites or locations alone. The thresholds used in the SA methodology to guide the scoring process have been prepared for the assessment of significance at sites alone. Cumulative effects are considered in terms of total effects at the plan level for the respective SEA topics. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
115		1242961		Site Assessments	Tesni2	Tesni Property Ltd	1235672	ZW	Mr Zac Wade	Graduate Planner WSP   Indigo	The submission promotes CF50362 as a viable site and submits appendices to support this view for 110 dwellings. Asks for criteria as to why the site has been marked down for drainage and transport to allow for improvements.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.



A	B	C	D	E	F	G	H	I	J	K	L	M
116	Mr Lewis Searle	1276434		Introduction	LewisSearle1	Wyre Piddle Parish Council					Concerned that the SA and SWDPR32 and 33 do not take into account current pluvial rainfall totals when rainfall has increased over 150% and will increase by 265% over the next 30 years. Flood risk mitigation and surface water run off designs should be designed to take into account the worst case scenario for rainfall plus the percentage addition for climate change. The SA and the two policies mentioned do not take into account how surface water run off from higher ground will be affected by the developments. Surface water run off is calculated for each site but no mention is made of water percolating into or around the sites from higher ground and how this will affect properties lower down. As we have seen from recent applications, unless drainage systems are designed for extreme events, this type of situation will increase. It would appear that the average home owner cannot rely on this policy unless there is a matrix for identifying a remedy for flooding which might occur if increased flooding occurs once a development is built. If there is evidence that there will be an increase in rainfall, then it is patently wrong to continue to use outdated rainfall averages. The SWDPR needs to be proactive and not set in the past. In the end it is people who are more important than a 'one off' consideration of financial savings. Development in all strategic locations will result in adverse impacts on climate change. These adverse impacts should be designed out to result in a zero or better impact on climate change to mitigate against flooding.	The cumulative effects assessment process is quite different to the assessment of single sites or locations alone. The thresholds used in the SA methodology to guide the scoring process have been prepared for the assessment of significance at sites alone. Cumulative effects are considered in terms of total effects at the plan level for the respective SEA topics. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
117	Mr Nevin Holden	1192568		Appendix G	Nevin Holden MMG	Strategic Land Manager, South Mactaggart and Mickel Group	1192567	KatherineElse	Mrs Katherine Else	Claremont Planning	It is requested that the discounting of CF50136 is revised to remove reference to the proximity to the gas main and the removal of the site being inappropriate.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
118	Mr Nevin Holden	1192568		Site Assessments	Nevin Holden MMG	Strategic Land Manager, South Mactaggart and Mickel Group	1192567	KatherineElse	Mrs Katherine Else	Claremont Planning	The reallocation of SWDPS9zzi is supported and the assessment should take into account its previous allocation and approved planning consent. The assessment of adjacent CF50136 is flawed and contrary to the approach of previous allocations at Hallow as it must take the surrounding sites into account. The Gas Line is not a constraint here and the Hallow NP includes an allocated site on CF50136, showing the site is deliverable. The SA needs correcting to remove reference to the proximity of the gas main as a limiting factor to the sites suitability. 19/00561/FULL demonstrates that the proximity of the gas pipeline to SWDPS9zzi was not a material consideration that should influence the consideration of promoted sites. This represents a clear methodological inconsistency of the SWDP evidence base and SA process notwithstanding that the Health and Safety Executive has identified minimum and maximum acceptable assessment distances from gas pipelines which Greenhill Lane is suitable for. The SA review and evidence base is based on incorrect evidence and hasn't considered sites fairly or accurately. The error in the application of the methodology and inconsistent approach represents a fundamental flaw to the evidence base that will not be defensible at examination	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
119	Mrs Ann Dobbins	1173349		Site Assessments	Ann Dobbins	Town Clerk Pershore Town Council					Disappointed in the quality of the consultation - with a difficult to read and understand document in the time frame given. The SA makes many assumptions about the effect the application of proposed policies will have on the sustainability of sites, these are viewed as unrealistic. For example the policy on sustainable drainage will mitigate surface water drainage impacts are unsupported. Comments CF50350sc the assessment fails to address the practical issues which is not defined. These include access. Finally, the assessment of Tiddesley Woods SSSI fails to consider the impacts on ground-nesting and foraging birds, disturbance by pets and walkers and habitats effect by light pollution.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
120	Art Lavelle	1241819		Methodology	Art Lavelle						The methodology used for identifying the best performing options for the nine strategic locations through a ranking exercise however, there is no justification as to why this method has been chosen. Secondly, underlying such an approach, is the unstated notion that all the SA objectives have equal value - if this is intentional it needs to be explicit. A more rational approach would be to allocate numerical values of worth rather than ranking. In two cases, CF50350sc (page D38) and SWDP60/15 (page E54), comments note the proposed development 'could potentially have a major negative on the SSSI'. However, the site CF50325 (page G15) is rejected largely because of harm to the SSSI. It presents a lack of objectivity to the approach which was taken.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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. Chapter 11 of the PPG (Paragraph 018 Reference ID: 11-018-20140306 ÆC" see para 3) states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores are used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA Objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level and it is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites.
121	Spitfire Homes	1276499		Site Assessments	Spitfire Homes	Spitfire Homes	1196795	Darren Oakley RPS	Darren Oakley	Principal Planner RPS	CF50404 should be re-considered and due to the fact the assessment did not take on board information which was provided during the Preferred Options Consultation in 2019. And that the assessment has been unduly harsh on the site and the appraisal has not been applied consistently across all sites. Which have been proposed for allocation specifically a number of sites have been selected based on a net, or smaller developable area being applied as part of their reason for selecting the site. This has not been applied CF50404 as subdivision of the site was not considered following the submission of representations at the previous consultation stage. Therefore, there are no reasons are given in the SHELAA or Reg 18 (III) SA that the site should be treated differently. This raises concerns about the site assessment process in the SA.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
122	Mr Sharanjit Singh Purewal	1276501	Chapter 3 Para: 3.6.1 - 3.6.4	Introduction	Mr Sharanjit Singh Purewal		1188199	DavidAddison	Mr David Addison	AddisonRees Planning Consultancy Ltd	Agree with the appraisal of Worcestershire Parkway allocation.	Comments noted.
123	Mr Sharanjit Singh Purewal	1276501	Para B9.1 - B9.12.3	Appendix B	Mr Sharanjit Singh Purewal		1188199	DavidAddison	Mr David Addison	AddisonRees Planning Consultancy Ltd	Agree with the strategic location assessment of the Worcestershire Parkway allocation. Highlights the findings would suggest development to the north of BA084 due to existing infrastructure and housing.	Comments noted.
124	Faccenda Properties	1276506		Site Assessments	Faccenda Properties		1276505	Emma Bilton	Emma Bilton	Quod	In support of the rejection of CF50116 ('All Things Wild') in the SA but recommend that Honeybourne Neighbourhood Plan allocation is reflected in the final SWDP. The comments are too simplified within appendix G23 and highlight that the SA neglects to acknowledge the area is at risk of fluvial flooding and high risk of surface water flooding which makes it not suitable for residential development. As well as the loss of priority habitat woodland, impact on landscape/townscape, impacts on air quality, site of employment and the housing needs have been assessed which is in the Honeybourne Neighbourhood Plan.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
125	Mr and Mrs J and N Cottrill	1233309		Appendix G	mr and mrs j cottrill		1184733	Julia Day	Julia Day	Inchbald Day Planning and Development Ltd	In regards to CF50663 there are mistakes in the assessment in regards to TPO's and the Significant Gap and should be re-assessed in the SA.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
126	Dr Graeme Neil Crisp	1276541		Methodology	Dr Graeme Crisp						No assessment has been carried out to look at the effects of multiple sites which are closely located, for example CF50407sc and CF50905sc. Furthermore, the impact on air quality has not been properly assessed through the siting of emission monitoring points. Finally, the impact on the ANOB due to the close proximity of these two sites has not been taken into proper account.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
127	Mrs Donna Williams	1276598	B7.1	Appendix B	Donna Williams						Section B7.1 has factual inaccuracies such as widening Church Road would not provide direct access onto strategic highway network. As well as a number of distances significantly incorrect and undermines the carbon emissions calculations. As well as a number of inaccuracies about local facilities, and the impact on the SSSI.	Comments noted. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
128	Mr Richard Burrell	1238980	3.6.11	Strategic Locations	RichardBurrell						Regarding the statement 'it was agreed that Wychavon would assist Tewkesbury to meet its outstanding housing requirement'. This statement is incorrect and therefore leads the reader to an incorrect assumption. Can Wychavon demonstrate that there is a full assessment of development alternatives within Tewkesbury and the wider JCS area?	A duty to co-operate commitment has been established with Tewkesbury Borough Council. An additional allocation of 500 dwellings to meet Tewkesbury's growth needs has been allocated in Wychavon district. It is important to make clear that this allocation of 500 dwellings has not been included in the South Worcestershire Council's housing requirement and a additional growth that is being accommodated in South Worcestershire to meet Tewkesbury borough's needs. The SWDP Review proposes the allocation of a further 500 dwellings to meet South Worcestershire's need.

A	B	C	D	E	F	G	H	I	J	K	L	M
129	Mr Richard Burrell	1238980	B.5.1, B.5.2, B.5.3, B.5.4, B.5.5, B.5.6, B.5.8, B.5.9, B.5.10, B.5.11, B.5.12	Appendix B	RichardBurrell						The SA objective comments and rankings in the report need to be revised based on the following: B.5.1 The site is constrained and served by two minor roads which are already busy roads leading to congestion. This development would cause greater congestion due to the lack of employment opportunities resulting in commuting elsewhere, which isn't mentioned in the report. There is also no appraisal of the local grid capacity in supplying electricity. B.5.2 This is a desktop exercise without knowledge as to what happens on the site due to its flooding issues. B.5.3 Many birds reside in this area as well as it being an ancient woodland, hedgerows and wildlife. Facts in this section have not been gathered from visit or local knowledge and should be included. B.5.4 The lay of the land cannot be appreciated from a map. This development will be highly visible. As well as the proposed development would protrude into Wychavon District and subsume the neighbouring hamlet, this contradicts the parish plan. B.5.5 The sewage system is barely adequate now before added pressures by any development. No mention of fumes and odours from the motorway. Finally, Tewkesbury suffers from air pollution and this development will only exacerbate this problem. B.5.6 There is conflict between what is stated in paragraph 3.3.2.7 and paragraph 3.3.2.7 should be amended. B.5.7 Due to the flood risk will result the housing will be on one side of the site. Thus creating a higher density than the overall figures would suggest as not all of the land can be used. B.5.8 All facilities funding will go to Wychavon despite people using the Gloucestershire facilities. The bridges referred to in paragraph B.5.8.3 are misleading to the reader and should be corrected. Finally, B.5.8.4 refers to a play area which is in a flood zone and frequently floods. B.5.9 The site is urban sprawl and negatively impacts Tewkesbury. B.5.10 The development will increase congestion on the road network, the railway station carpark is already at capacity, and it is difficult to get public transport. Also, there is no mention of Ashchurch Garden Town and the impacts that will have on the road network. As well as there being a transient population which hasn't been mentioned due to the camping site adjacent to the site. B.5.11 The report doesn't reflect the reality of the different education systems in Worcestershire and Gloucestershire and the capacity available at the schools. As well as the impacts of Ashchurch Garden Town on education. B.5.12 The report lacks detail and does not consider the wider public service economy and how this is affected by development at this location. There is no resolution or mentioned in the report of the issues as to how this site will be financially sustainable in terms of Tewkesbury and Gloucestershire service into the future due to its cross border locations, with Wychavon DC receiving s106 funding as well as funding for services.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
130	Mr Graham Boocock	1241678	Box 2.1	Methodology	GrahamBoocock						The report basis is from desktop based data which is out of date and using calculations from 2014. Malvern Hills District Council and Worcester City Council have committed to going carbon neutral by 2030 whereas, Wychavon has not -does this mean that there is a likelihood for Wychavon to be required more of the impact as a result? (based on box 2.1).	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. Wychavon District Council have developed an 'Intelligently Green' Plan (2020 to 2030) that reflects the Worcestershire Energy Strategy targets comprising the need to reduce the council's own emissions by at least 75% in 2030, and to have the district wide carbon emissions by 2030. Malvern Hills District Council have produced a 'Destination Zero' plan with a vision to lead the district to become carbon neutral as quickly as possible, with at least a 50% reduction by 2030. Worcester City Council have produced an 'Environmental Sustainability Strategy' (2020) which seeks to make Worcester a carbon neutral city by 2030.
131	Mr Graham Boocock	1241678		Policy Assessments	GrahamBoocock						Much of the report focuses on environment and there is little consideration in the evidence for the social and economic impact of creating a new town of 6000 dwellings. What are the economic impacts for small rural businesses etc and the social impacts on rural communities by the new town. The report also lacks a realistic assessment of the impact of commuter traffic to the surrounding towns and direct travel to Redditch and beyond. The SA makes many assumptions about the effects the impact of the proposed policies will have on the sustainability of sites, including strategic ones. The SA makes the assumption that the policies will mitigate the negative impacts of development to an unrealistic extent. For example, the statement surrounding Sustainable Drainage mitigating surface water drainage impacts is unsupported by evidence.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
132	Mr Graham Boocock	1241678	Table 2.4	Methodology	GrahamBoocock						The criteria for impacts seems to have little rigour behind the application of the scoring. With a small number of points are made in each objective section and this results in a score.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SA methodology (see Chapter 2 of the R18(III) SA Report) identifies six scoring categories. There is no legislative basis for the scoring protocol. Scores with symbols are used to provide rapid snapshot summaries of sustainability performance. They should never be read alone and always read with the narrative interpretation of the scores that is provided in the SA report. The uncertain category is used to indicate that it is entirely uncertain whether impacts would be positive or adverse; they may both exist but cannot be tangibly determined at the high level of assessment that forms the cornerstone of the SEA process.
133	Maclaggart and Mickel England Ltd	1276609		Introduction	Maclaggart and Mickel England Ltd		1196820	russellsmith3	Mr Russell Smith	Principal Consultant Walsingham Planning	This consultation has not been presented in a clear and transparent manner. Firstly the reasons for carrying out this consultation have not been made clear; an explanation of what specific matters the SA Reg 18 (III) is addressing. Secondly the revisions to the SA have not been clearly signed posted making it difficult to spot the differences with the SA Reg 18 (II). It is also not clear where the Reg 18 (III) fits into the plan preparation and SA process. It is unclear whether the SA Reg 18 (III) is an addendum to or a replacement of the SA Reg (II). Comments on the Reg 18 SA (III) are by extension comments on the site allocations and policies in the preferred options. The signposting in the report in paragraph 1.10 does not match the contents in paragraph 1.10.2 or the contents page or the report itself.	5.19 (5) of the Planning and Compulsory Purchase Act 2004 requires that an appraisal of the sustainability of the proposals in each document known as a 'sustainability appraisal' is carried out and that the plan makers prepare a report of the findings of the appraisal. Regulation 22(1)(a) of the Town and Country Planning (England) Regulations 2012 requires that a sustainability appraisal report be submitted to the Secretary of State alongside the local plan. PPG (Chapter 11, para 018) recognises that the development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The SA process for the SWDPR has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. Sustainability appraisal and strategic environmental assessment are tools used to assess the likely effects of the plan when judged against reasonable alternatives. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The requirements of the SEA Directive for an environmental report are defined in terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council (2012), Citation Number: [2012] EWHC 2542 (Admin). The Regulation 18 (III) consultation provides greater clarification and updates to elements of the Sustainability Appraisal evidence base work.
134	Bloor Homes (Western) Limited	1197567		Site Assessments	Bloor Homes (Western) Limited	Bloor Homes (Western) Limited	1276626	Jonathan Dodd	Jonathan Dodd	Turley	The site at Birmingham Road (Claybook Farm), Badsey (CF50952) has not been adequately assessed in the further SA report. This is a flaw in the plan preparation process as a gap in the evidence base. This site is suitable for development.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work.
135	Metacre Ltd	1276630		Site Assessments	Metacre1		1276629	Grant Baylis 1	Mr Grant Baylis	Ridge and Partners LLP	Supports the inclusion of CFS844 as a preferred option and its analysis in the SA. CFS122b and CFS844 should be merged as a single site in the regulation 19 consultation. The assessment completed by Ridge and Partners LLP based off the SA appraisal the site is suitable for development.	Comments noted. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
136	Susan Wingate	1276636		Site Assessments	Susan Wingate	Strensham Parish Council					Oppose housing and employment development in Strensham as this is not in conformity with the SA objectives. Objective 1: There will be increased car usage due to distance to the station and main routes. Objective 2: Development would increase the flood risk and the flood level. Objective 3: The development next to the SSSI would pose a serve threat and there is incursion into the IRR and LWS identified in the appraisal would have a great negative impact on biodiversity. Objective 4: Development will a major negative impact on the landscape. Objective 5: Due to the topography of the site any pollutants would naturally drain towards the river. Objective 6: Some of agricultural land exemplifies the description of 'best and most versatile'. Objective 8: The measurement of the distance to Bredon Surgery does not take the river crossing into consideration, a practicable road distance is 12km. Objective 10: The roads are unsuitable for pedestrians and cyclists. Objectives 12: There are limited job opportunities in Strensham so any residents would need to commute further to work.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work.



A	B	C	D	E	F	G	H	I	J	K	L	M
144	Mr Graham Boocock	1241678		Strategic Locations	GrahamBoocock							<p>The ranking of the site is significantly influenced by the statement that it will be 100% powered by solar power. There is no evidence that this can be achieved. The scoring of this in objective 1 is unsupported. It is also assumed all the energy from the new 2000 homes at Throckmorton will be from renewable source. Furthermore, the definition of a negative impact is a 1% increase in emissions as a result of a site and a minor negative if between 0.1 and 0.99%. Based on 2017 data Throckmorton = 3.5% increase and Worcester Parkway = 7.9% - how has this report managed to reduce both of these sites under 1% of our 2017 emission - can this calculation be shown? Furthermore, in regards to house building how can estimates of CO2 production of house construction? and where is this included in the sustainability report? Is there a figure on how much emission comes from the construction industry? The analysis recognises the flood risk - but provides little indication of reasons for the ranking scores. What consideration is given to the likelihood of two or three main commuters routes being prone to flooding and how does this factor into the site rankings? Objective 3 - The assessment takes no account of the wider impact of this pollution, or the effectiveness of policies promoting Sustainable Drainage (SuDS). There is a claim that Throckmorton is the most suitable as it is not close to any "European sites". No further justification is given for the ranking? why? The biodiversity and geodiversity impacts all acknowledged to be negative at all sites how is this going to be offset? Objective 4 - The existence of the airfield is being used as justification for the score without consideration of the rest of the area. Objective 5 - Throckmorton is an environmental hazard in itself - how will this be overcome? What cost has been considered for the extensive archaeological work which would be required at their airfield? What costs have been considered for the protection of the foot and mouth burial site and clean up of the illegally deposited toxic waste at the land neighbouring the airfield? Objective 6 - The amount of pre developed land fails to recognise the reality of the Throckmorton site. Objective 7 - No evidence is provided beyond the number of houses which is believed to be possible. Objective 8 - Analysis lacks clear evidence to substantiate. Objective 9 - There are known archaeological sites throughout the area and the council has already acknowledged that investigation of these sites could run into the millions of pounds. Given the known archaeological sites around the proposed Throckmorton airfield, and the potential for investigations to cost millions of pounds, how will developers be reassured that the chosen land space is sustainable to build upon? Objective 10 - The assumption in the figures that people will cycle or walk to the train station is contradicted by local evidence. Has any study been undertaken of the impacts on the smaller local roads especially Northbound direction which was completely ignored by the earlier consultation exercise but is in fact a well utilised and logical commuting route? Given it's distance from employment centres has any sense check or impact assessment been conducted on traffic volumes if the population should fail to follow the vague predictions that everyone will walk or cycle and take the train? Objective 11 - The education analysis lacks clear evidence to be substantiated. Objective 12 - What consideration has been given to attractiveness of the different locations in terms of transport links, access to markets and accessibility to skilled workforce? What consideration has been given to the negative impact of loss of rural businesses or businesses relocating away from a large residential development? The site specifically: Where is the promised buffer between Pivvin, Wyre Piddle, Throckmorton and other villages going to go? You also want to include amenities including a school, a country park?</p>
145	Mr Graham Boocock	1241678	Paragraph B8.1.2 and B8.1.3	Appendix B	GrahamBoocock							<p>The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.</p>
146		1197100	B.8.1.0	Appendix B	Platform1	Platform Housing Group	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited		<p>Throckmorton to Pershore Railway station is a similar distance as Kempsey to Worcester Parkway. Giving Kempsey a positive rating and Throckmorton a negative one is inconsistent. Kempsey also has far more services than Throckmorton.</p>
147		1197100	B.8.7.1	Appendix B	Platform1	Platform Housing Group	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited		<p>The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A full viability update is being undertaken and will form part of the evidence base for the Regulation 19 Publication version of the SWDP Review.</p>
148		1197100	B.8.10.1	Appendix B	Platform1	Platform Housing Group	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited		<p>The inclusion of Throckmorton on the basis of previous SA scores are misguided. The sort of modal transport shift assumed by the SA would be difficult to achieve on a significant scale in this location. Under the travel and transport category within the previous SA, Throckmorton scored a double negative. The potential to bring a few buses onto the site won't address the issue to the degree it is alleged in the SA. It is not clear why this site now performs better than it did. Evidence should be requested as to how it is financially viable for Throckmorton to be powered entirely by solar energy and that appropriate levels of battery storage is provided and that infrastructure will be able to cope with future electric car provision. If the evidence is not forthcoming then this factor shouldn't be given weight. It should be made clear to land promoters at Throckmorton that the solar farm would need to be delivered in addition to 40% GI provision and not instead of.</p>
149		1197100	2.17 and 2.19	Methodology	Platform1	Platform Housing Group	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited		<p>There is no obvious link drawn between the generation of traffic from sites onto uncongested rural routes, as opposed to congested urban routes and strategic road network. More should be made of this in determining whether the strategy of dispersal - expansion of existing market towns and other settlements in rural locations would be more appropriate.</p>
150		1197100	C.3.4	Appendix C	Platform1	Platform Housing Group	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited		<p>SWDPR15 has only been lightly assessed with no impact identified. This policy is concerning to medium and large housebuilders who will see it as a substantial constraint. Multiple contractors and vehicle movements could hamper delivery and little consideration has been given to the requirements of Registered Providers or promote numerous sites. They wouldn't wish to lose affordable homes in favour of self build plots to people who do not need an affordable home. Further consideration of this policy is needed.</p>



A	B	C	D	E	F	G	H	I	J	K	L	M
154	161	1197380	C.3.4	Appendix C	Piper Homes	Piper Homes	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	SWDR15 has only been lightly assessed with no impact identified. This policy is concerning to medium and large housebuilders who will see it as a substantial constraint. Multiple contractors and vehicle movements could hamper delivery and little consideration has been given to the requirements of Registered Providers or promote numerous sites. They wouldn't wish to lose affordable homes in favour of self build plots to people who do not need an affordable home. Further consideration of this policy is needed.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
155	162	1197380		Appendix D	Piper Homes	Piper Homes	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	Note that CF50885A&B are assessed against a quantum of development of 600 dwellings. We consider this is unachievable and further SA work is needed to justify it. The majority of Reasonable alternative sites are also proposed sites within the PO document. It is therefore unclear how these sites can be considered as alternatives, this also applies to CF50194sc which has been divided into four parcels. The sites minor negative at D.3.3.1 is overly cautious and the major negative against education is inaccurate. We support it's allocation but suggest the other three umbrella sites should also be allocated.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
156	163	1197380		Appendix G	Piper Homes	Piper Homes	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	Entirely support the proposed allocation of CF50194sc. CF50194a is rejected due to impact on character whilst CF50194b and CF50194c are not listed in selection or rejected and as such a reassessment of the sites is needed.	The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. The SA process for the SWDR has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council [2012], Citation Number: [2012] EWHC 2542 (Admin). Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELA) and the accompanying detailed site assessment evidence base work.
157	164	1276660		Site Assessments	GreyfortGroup	Greyfort Group	1276663	AndrewTildesley	Mr Andrew Tildesley	Director Copperfield L&P Ltd	Since the Chateau Impney was purchased in 2012 there has been a significant amount of investment into the hotel facilities, however in 2020 the business permanently ceased trading. Existing businesses and residents on site will be retained. The proposed site is an opportunity to create a sustainable future for the Impney estate with a mix of commercial, leisure and residential land uses. Would like the site considered as a reasonable alternative as a site for future development and identified as a major development site in the review of the SWDP.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
158	165	1276660	SA1	Methodology	GreyfortGroup	Greyfort Group	1276663	AndrewTildesley	Mr Andrew Tildesley	Director Copperfield L&P Ltd	The site is brownfield and it was built at a time when energy consumption and generation was not a high priority consideration. The re-use of this site with a reduced volume of development should deliver a net-positive response to climate change.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
159	166	1276660	SA9	Methodology	GreyfortGroup	Greyfort Group	1276663	AndrewTildesley	Mr Andrew Tildesley	Director Copperfield L&P Ltd	The site would use some areas of greenfield land, but return other areas back to greenfield through reinstatement of the grounds around the historic asset. The zones of theoretical vision are have informed that an improved zone of theoretical visibility could be provided to reinstate historic parkland and enhance the setting of the Impney Hall (Grade II*). There would be significant benefits to heritage through removal of poor quality buildings attached to the hall, removal of buildings surrounding the hall and re-landscaping areas, removal of roads and infrastructure and re-landscaping these areas.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
160	167	1276660	SA10	Methodology	GreyfortGroup	Greyfort Group	1276663	AndrewTildesley	Mr Andrew Tildesley	Director Copperfield L&P Ltd	The site is highly sustainable, with a dedicated cycle route and sited on a bus route. Health and wellbeing benefits associated to its proximity to the John Corbett way public right of way. Reasonably accessible to the train station.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
161	168	1276660	SA2	Methodology	GreyfortGroup	Greyfort Group	1276663	AndrewTildesley	Mr Andrew Tildesley	Director Copperfield L&P Ltd	Some level of redevelopment would lead to a reduction in site run-off through being designed to a greenfield rather than brownfield run-off rate.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
162	169	1276660	SA3	Methodology	GreyfortGroup	Greyfort Group	1276663	AndrewTildesley	Mr Andrew Tildesley	Director Copperfield L&P Ltd	The proposed site could lead to a positive outcome in respect to biodiversity and geodiversity.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
163	173	1276660	sa5 and sa6	Methodology	GreyfortGroup	Greyfort Group	1276663	AndrewTildesley	Mr Andrew Tildesley	Director Copperfield L&P Ltd	Impact on pollution and waste would be neutral. None of the land is BMVAL.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
164	174	1276660	sa11	Strategic Locations	GreyfortGroup	Greyfort Group	1276663	AndrewTildesley	Mr Andrew Tildesley	Director Copperfield L&P Ltd	The development is not of a scale to provide a new school.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
165	175	1197100		Appendix D	Platform1	Platform Housing Group	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	It is unclear how sites can be considered alternative where they are already proposed for housing. No alternative for smaller sites in Malvern have been considered, contrary to paragraph 68 of the NPPF. Land at Pickersleigh Grove has been refused Planning Permission since the 2019 SA as it is allocated as Green Space in the Neighbourhood Plan and SWDP. It isn't understood how this could be as there is no access to the site. The benefits provided by residential development on this parcel of land far outweigh the harm. The sites score could be improved with an approved application in categories such as Transport and Accessibility, which has incorrectly been scored as a minor negative as the site is close to a number of services in Malvern, including bus stops. The site shouldn't have scored a major negative on Cultural Heritage. A reassessment would result in greater appreciation as to the sustainability of the site and it would score higher than many, or all, of the reasonable alternatives. The site should be considered as a reasonable alternative at the very least and it is unclear why two adjacent sites that have scored poorly have been selected.	The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SA process for the SWDR has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council [2012], Citation Number: [2012] EWHC 2542 (Admin).
166	176	1197100		Appendix D	Platform1	Platform Housing Group	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	The SA has not considered any new sites in Crowle but the site at Foxmere Road had not been submitted before the last SA. This site could accommodate 12 dwellings and has been the subject of a previous planning application demonstrating that development on the site was achievable. The site would benefit from similar or a more positive sustainability ratings than sites in nearby Tibberton and Himbleton as Crowle has extensive facilities. The site should be assessed and a greater number of smaller sites considered to avoid being contrary to NPPF paragraph 68.	The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SA process for the SWDR has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council [2012], Citation Number: [2012] EWHC 2542 (Admin). A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
167	177	The Kirby Family	1276686	8.8.7.1	Appendix B	KirbyFamily	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	Has concerns that the housing objective for strategic sites only looks at housing delivery in capacity terms and there is no further examination of the likelihood of affordable housing delivering as a proportion of the figure. This is particularly relevant to Throckmorton which is largely previously developed and where infrastructure costs is a constraint to development. It isn't clear whether affordable housing can therefore be reduced on this site as a result of viability.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021. The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021. To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A full viability update is being undertaken and will form part of the evidence base for the Regulation 19 Publication version of the SWDP Review.
168	178	The Kirby Family	1276686	8.8.10	Appendix B	KirbyFamily	1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	Throckmorton to Pershore Railway station is a similar distance as Kempsey to Worcester Parkway. Giving Kempsey a positive rating and Throckmorton a negative one is inconsistent. Kempsey also has far more services than Throckmorton.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021. The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021. To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.

A	B	C	D	E	F	G	H	I	J	K	L	M
179	The Kirby Family	1276686	B.8.10.1	Appendix B	KirbyFamily		1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	The inclusion of Throckmorton on the basis of previous SA scores are misguided. The sort of modal transport shift assumed by the SA would be difficult to achieve on a significant scale in this location. Under the travel and transport category within the previous SA, Throckmorton scored a double negative. The potential to bring a few buses onto the site won't address the issue to the degree it is alleged in the SA. It is not clear why this site now performs better than it did. Evidence should be requested as to how it is financially viable for Throckmorton to be powered entirely by solar energy and that appropriate levels of battery storage is provided and that infrastructure will be able to cope with future electric car provision. If the evidence is not forthcoming then this factor shouldn't be given weight. It should be made clear to land promoters at Throckmorton that the solar farm would need to be delivered in addition to 40% GI provision and not instead of.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites.
180	The Kirby Family	1276686	C.3.1 and C.3.2	Appendix C	KirbyFamily		1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	Affordable housing is only considered under SWDP14 and not under the health and wellbeing objective. The delivery of affordable housing would make a contribution to health and wellbeing where it would be delivered by a Registered Provider and for those at risk of homelessness, in inappropriate accommodation or those unable to afford their own home.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
181	The Kirby Family	1276686	2.17 and 2.19	Methodology	KirbyFamily		1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	There is no obvious link drawn between the generation of traffic from sites onto uncongested rural routes, as opposed to congested urban routes and strategic road network. More should be made of this in determining whether the strategy of dispersal - expansion of existing market towns and other settlements in rural locations would be more appropriate.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
182	The Kirby Family	1276686	C.3.4	Appendix C	KirbyFamily		1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	SWDPR15 has only been lightly assessed with no impact identified. This policy is concerning to medium and large housebuilders who will see it as a substantial constraint. Multiple contractors and vehicle movements could hamper delivery and little consideration has been given to the requirements of Registered Providers are promote numerous sites. They wouldn't wish to lose affordable homes in favour of self build plots to people who do not need an affordable home. Further consideration of this policy is needed.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
183	The Kirby Family	1276686	D.3	Introduction	KirbyFamily		1241469	Joe Bennett	Joe Bennett	RCA Regeneration Limited	600 dwellings assessed at CFS0855A and B is too much for the site. No additional RAs are put forward for Lower Broadheath but CFS0045 was chosen as it is located adjacent to the development boundary. CFS0119 was rejected due to scale and in response a smaller cut was instead promoted. This would be more appropriate and relates very well to the village. It could accommodate 55 dwellings and the site would still score highly. Whilst the site is within the Significant Gap, the site would not project further into the open countryside an would have a negligible impact in terms of coalescence and urban sprawl. As such, the amended smaller cut should have been subject to SA testing as it is in a category one village close to services.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
187	Mr B Minder	1276759	sa10	Methodology	Mr B Minder						If the cycle paths are going to be like the cycle paths that were put in the last two big developments, (Wardon Villages & St Peters) then they are such a bad design, to the point they are dangerous.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
188	Mr B Minder	1276759	sa12	Introduction	Mr B Minder						In terms of commuting then where are these X amount people that are going to live in the SWDP going to work? I hope it's not going to be London as the closeness of the Worcester Parkway station is very close to drive to. Commuting to London is not very sustainable.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
189	Mr B Minder	1276759	sa2	Methodology	Mr B Minder						The houses are run of the mill. Just scrapping by to pass the current green credentials. Nevermind what is needed 10, 20 years down the line.	Comments Noted. This response does not relate to the Sustainability Appraisal process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
190		1196642	B.8.7.1	Appendix B	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Has concerns that the housing objective for strategic sites only looks at housing delivery in capacity terms and there is no further examination of the likelihood of affordable housing delivering as a proportion of the figure. This is particularly relevant to Throckmorton which is largely previously developed and where infrastructure costs is a constraint to development. It isn't clear whether affordable housing can therefore be reduced on this site as a result of viability.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A full viability update is being undertaken and will form part of the evidence base for the Regulation 19 Publication version of the SWDP Review.
191		1196642	B.8.10	Appendix B	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Throckmorton to Pershore Railway station is a similar distance as Kempsey to Worcester Parkway. Giving Kempsey a positive rating and Throckmorton a negative one is inconsistent. Kempsey also has far more services than Throckmorton.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
192		1196642	B.8.10.1	Appendix B	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	The inclusion of Throckmorton on the basis of previous SA scores are misguided. The sort of modal transport shift assumed by the SA would be difficult to achieve on a significant scale in this location. Under the travel and transport category within the previous SA, Throckmorton scored a double negative. The potential to bring a few buses onto the site won't address the issue to the degree it is alleged in the SA. It is not clear why this site now performs better than it did. Evidence should be requested as to how it is financially viable for Throckmorton to be powered entirely by solar energy and that appropriate levels of battery storage is provided and that infrastructure will be able to cope with future electric car provision. If the evidence is not forthcoming then this factor shouldn't be given weight. It should be made clear to land promoters at Throckmorton that the solar farm would need to be delivered in addition to 40% GI provision and not instead of.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites.
193		1196642	C.3.1 and C.3.2	Appendix C	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Affordable housing is only considered under SWDP14 and not under the health and wellbeing objective. The delivery of affordable housing would make a contribution to health and wellbeing where it would be delivered by a Registered Provider and for those at risk of homelessness, in inappropriate accommodation or those unable to afford their own home.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.

A	B	C	D	E	F	G	H	I	J	K	L	M
181	194	1196642	2.16	Methodology	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Paragraph 2.16 being assessed as a capacity matter rather than providing a range of housing needs readdressing.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
182	195	1196642	2.17 and 2.19	Methodology	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	There is no obvious link drawn between the generation of traffic from sites onto uncongested rural routes, as opposed to congested urban routes and strategic road network. More should be made of this in determining whether the strategy of dispersal - expansion of existing market towns and other settlements in rural locations would be more appropriate.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
183	196	1196642	C.3.4	Appendix C	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	SWDPR15 has only been lightly assessed with no impact identified. This policy is concerning to medium and large housebuilders who will see it as a substantial constraint. Multiple contractors and vehicle movements could hamper delivery and little consideration has been given to the requirements of Registered Providers are promote numerous sites. They wouldn't wish to lose affordable homes in favour of self build plots to people who do not need an affordable home. Further consideration of this policy is needed.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
184	197	1196642	D.3	Appendix D	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	The SA assesses CFS0855A&B against a quantum of development of 600 dwellings. We consider this is unachievable and consider further SA work will be required against this site as the magnitude of impact will not be correct.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
185	198	1196642		Appendix G	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	We have considered the reasonable alternatives in the SA and note these should be assessed against the baseline economic, environmental and social characteristics and the likely situation were the plan not to be adopted. A number of reasonable alternatives are missing from the SA and it is not clear why these haven't been assessed. A number of plans have been subject to successful legal challenges on the grounds that reasonable alternatives were not adequately identified and/or appraised by the local planning authority during the plan preparation process including Calverton PC vs Nottingham CC; Heard vs Broadland DC; South Norfolk DC and Norwich City Council; Chiltern DC EWCA Civ 1393; Ashdown Forest Economic Development vs Wealden DC; Ashdown Forest Economic Development vs Wealden DC South Downs NPA; R. vs Welsh Ministers.	The SA process for the SWDPR has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Sustainability appraisal and strategic environmental assessment are tools used to assess the likely effects of the plan when judged against reasonable alternatives. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council (2012), Citation Number: [2012] EWHC 2542 (Admin). A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
186	199	1196642		Appendix G	Richborough Estates 3	Richborough Estates	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Considers that CFS0428 should have been included as a reasonable alternative and we have submitted how noise on the site isn't an issue. The SHELAA identifies a number of sites in the village as suitable for development but none are picked up in the SA.	The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include "an outline of the reasons for selecting the alternatives dealt with". See Annex 1(h) of the SEA Directive. The SA process for the SWDPR has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council (2012), Citation Number: [2012] EWHC 2542 (Admin). Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work.
187	200	1242892	B.8.7.1	Appendix B	Harris Land Management	Harris Land Management	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Has concerns that the housing objective for strategic sites only looks at housing delivery in capacity terms and there is no further examination of the likelihood of affordable housing delivering as a proportion of the figure. This is particularly relevant to Throckmorton which is largely previously developed and where infrastructure costs is a constraint to development. It isn't clear whether affordable housing can therefore be reduced on this site as a result of viability.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A full viability update is being undertaken and will form part of the evidence base for the Regulation 19 Publication version of the SWDP Review.
188	201	1242892	B.8.10	Appendix B	Harris Land Management	Harris Land Management	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Throckmorton to Pershore Railway station is a similar distance as Kempsey to Worcester Parkway. Giving Kempsey a positive rating and Throckmorton a negative one is inconsistent. Kempsey also has far more services than Throckmorton.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
189	202	1242892	B.8.10.1	Appendix B	Harris Land Management	Harris Land Management	1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	The inclusion of Throckmorton on the basis of previous SA scores are misguided. The sort of modal transport shift assumed by the SA would be difficult to achieve on a significant scale in this location. Under the travel and transport category within the previous SA, Throckmorton scored a double negative. The potential to bring a few buses onto the site won't address the issue to the degree it is alleged in the SA. It is not clear why this site now performs better than it did. Evidence should be requested as to how it is financially viable for Throckmorton to be powered entirely by solar energy and that appropriate levels of battery storage is provided and that infrastructure will be able to cope with future electric car provision. If the evidence is not forthcoming then this factor shouldn't be given weight. It should be made clear to land promoters at Throckmorton that the solar farm would need to be delivered in addition to 40% GI provision and not instead of.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites.





A	B	C	D	E	F	G	H	I	J	K	L	M
213		1276764	3.14	Strategic Locations	BredonPC		1276763	MrSimonKelly	Mr Simon Kelly		As I will explain, the revised sustainability appraisal that is now the subject of consultation has positively reassessed the Milton sites, albeit, without any explanation as to why the site scores have improved. The second complaint has not been addressed at all.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA Objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
214		1276764	3.14	Strategic Locations	BredonPC		1276763	MrSimonKelly	Mr Simon Kelly		The extent of the difference in the assessment of Milton are significant and not explained. The obvious concern is that the assessment has been amended in the light of earlier criticism to retrospectively justify the proposed allocation. Without an explanation of why the Milton sites have been 'upgraded' in the assessment, it is difficult for the consultees to provide an intelligent response to the consultation. In these circumstances, the common law imposes a duty on the Council to provide reasons for the changed assessment. In the absence of such reasons, the RSA consultation also breaches the Gunning Principles and is therefore unlawful.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA Objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
215	Millstrand Properties Ltd	1276652	8.8.7.1	Appendix B	Millstrand1		1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Has concerns that the housing objective for strategic sites only looks at housing delivery in capacity terms and there is no further examination of the likelihood of affordable housing delivering as a proportion of the figure. This is particularly relevant to Throckmorton which is largely previously developed and where infrastructure costs is a constraint to development. It isn't clear whether affordable housing can therefore be reduced on this site as a result of viability.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA Objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A full viability update is being undertaken and will form part of the evidence base for the Regulation 19 Publication version of the SWDP Review.
216	Millstrand Properties Ltd	1276652	8.8.10	Appendix B	Millstrand1		1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Throckmorton to Pershore Railway station is a similar distance as Kempsey to Worcester Parkway. Giving Kempsey a positive rating and Throckmorton a negative one is inconsistent. Kempsey also has far more services than Throckmorton.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA Objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
217	Millstrand Properties Ltd	1276652	8.8.10.1	Appendix B	Millstrand1		1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	The inclusion of Throckmorton on the basis of previous SA scores are misguided. The sort of modal transport shift assumed by the SA would be difficult to achieve on a significant scale in this location. Under the travel and transport category within the previous SA, Throckmorton scored a double negative. The potential to bring a few buses onto the site won't address the issue to the degree it is alleged in the SA. It is not clear why this site now performs better than it did. Evidence should be requested as to how it is financially viable for Throckmorton to be powered entirely by solar energy and that appropriate levels of battery storage is provided and that infrastructure will be able to cope with future electric car provision. If the evidence is not forthcoming then this factor shouldn't be given weight. It should be made clear to land promoters at Throckmorton that the solar farm would need to be delivered in addition to 40% GI provision and not instead.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA Objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites.
218	Millstrand Properties Ltd	1276652	c.3.3.1 and c.3.3.2	Appendix C	Millstrand1		1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Affordable housing is only considered under SWDP14 and not under the health and wellbeing objective. The delivery of affordable housing would make a contribution to health and wellbeing where it would be delivered by a Registered Provider and for those at risk of homelessness, in inappropriate accommodation or those unable to afford their own home.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
219	Millstrand Properties Ltd	1276652	2.16	Methodology	Millstrand1		1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	Paragraph 2.16 being assessed as a capacity matter rather than providing a range of housing needs readdressing.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
220	Millstrand Properties Ltd	1276652	2.17 and 2.19	Methodology	Millstrand1		1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	There is no obvious link drawn between the generation of traffic from sites onto uncongested rural routes, as opposed to congested urban routes and strategic road network. More should be made of this in determining whether the strategy of dispersal - expansion of existing market towns and other settlements in rural locations would be more appropriate.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.

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221	Millstrand Properties Ltd	1276652	c.3.4	Appendix C	Millstrand1		1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	SWDRP15 has only been lightly assessed with no impact identified. This policy is concerning to medium and large housebuilders who will see it as a substantial constraint. Multiple contractors and vehicle movements could hamper delivery and little consideration has been given to the requirements of Registered Providers are promote numerous sites. They wouldn't wish to lose affordable homes in favour of self build plots to people who do not need an affordable home. Further consideration of this policy is needed.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
222	Millstrand Properties Ltd	1276652	d.3	Introduction	Millstrand1		1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	The SA assesses CFS085A&B against a quantum of development of 600 dwellings. We consider this is unachievable and consider further SA work will be required against this site as the magnitude of impact will not be correct. We have considered the reasonable alternatives in the SA and note these should be assessed against the baseline economic, environmental and social characteristics and the likely situation were the plan not to be adopted. A number of reasonable alternatives are missing from the SA and it is not clear why these haven't been assessed. A number of plans have been subject to successful legal challenges on the grounds that reasonable alternatives were not adequately identified and/or appraised by the local planning authority during the plan preparation process including Calverton PC vs Nottingham CC; Heard vs Broadland DC, South Norfolk DC and Norwich City Council; Chiltern DC EWCA Civ 1393; Ashdown Forest Economic Development vs Wealden DC; Ashdown Forest Economic Development vs Wealden DC South Downs NPA; R vs Welsh Ministers.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Sustainability appraisal and strategic environmental assessment are tools used to assess the likely effects of the plan when judged against reasonable alternatives. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council (2012), Citation Number: [2012] EWHC 2542 (Admin). A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
223	Millstrand Properties Ltd	1276652		Appendix D	Millstrand1		1171769	Ms Sian Griffiths	Ms Sian Griffiths	Director RCA Regeneration Ltd	We have considered the reasonable alternatives in the SA and note these should be assessed against the baseline economic, environmental and social characteristics and the likely situation were the plan not to be adopted. A number of reasonable alternatives are missing from the SA and it is not clear why these haven't been assessed. A number of plans have been subject to successful legal challenges on the grounds that reasonable alternatives were not adequately identified and/or appraised by the local planning authority during the plan preparation process including Calverton PC vs Nottingham CC; Heard vs Broadland DC, South Norfolk DC and Norwich City Council; Chiltern DC EWCA Civ 1393; Ashdown Forest Economic Development vs Wealden DC; Ashdown Forest Economic Development vs Wealden DC South Downs NPA; R vs Welsh Ministers. Note that no sites within Lower Moor and Drakes Broughton have been considered as reasonable alternatives. Considers CFS0229, CFS0095 and CFS0297 would be appropriate reasonable alternatives and should be assessed against the SA objectives. Had a smaller cut been made CFS0097 was considered appropriate but not subject to SA assessment and it is not clear why? The assessment of this site was not undertaken in light of the planning permission granted on adjacent land. CFS0299 was considered in Appendix G but dismissed on the grounds that it was removed from the Development Boundary which makes no sense as it abuts the boundary.	The SA process for the SWDP has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Sustainability appraisal and strategic environmental assessment are tools used to assess the likely effects of the plan when judged against reasonable alternatives. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council (2012), Citation Number: [2012] EWHC 2542 (Admin). A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
224	Yana Burlachka	1276773	SA3	Strategic Locations	YanaBurlachka	Lead Advisor Natural England					With regards to the impacts on the Objective 3 Biodiversity and Geodiversity, we agree with the supporting comments in para. 3.3.13 - 3.3.16. We anticipate that more detailed ecological evidence gathering will be required to inform decision making for the preferred sites. The proposed allocations at Throckmorton (potentially include areas of higher biodiversity value than currently understood) and Mitton (consideration of the potential impacts on functionally linked lands used by migratory bird species associated with the Severn Estuary SPA) would particularly benefit from further assessment.	Comments noted. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
225	Yana Burlachka	1276773	BOX 2.6	Methodology	YanaBurlachka	Lead Advisor Natural England					Box 2. 6 Natural Resources. We support the assumption that development proposals which would result in the loss of 20ha or more of greenfield land would be expected to have a major negative impact on this objective. In particular, we welcome reference to the potential impacts on ecological networks and ability of ecological receptors to adapt to the effects of the climate change.	Comments noted. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
226	Yana Burlachka	1276773	TABLE 5.3	Site Assessments	YanaBurlachka	Lead Advisor Natural England					Table 5.3 Impacts matrix of the 41 additional reasonable alternative sites and 79 reallocated sites post-mitigation scoring the site CFS0350ic to have a negligible effect on biodiversity. Given our previous representations which outlined our concerns in relation to the location of this development adjacent to Tiddesley Wood SSSI, in particular extremely limited scope for the mitigation, we disagree that a negligible effect on biodiversity can be achieved and would welcome further clarification.	Comments Noted. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
227		1197380	B.8.7.1	Appendix B	Piper Homes	Piper Homes	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	Has concerns that the housing objective for strategic sites only looks at housing delivery in capacity terms and there is no further examination of the likelihood of affordable housing delivering as a proportion of the figure. This is particularly relevant to Throckmorton which is largely previously developed and where infrastructure costs is a constraint to development. It isn't clear whether affordable housing can therefore be reduced on this site as a result of viability.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDP, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDP plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA Objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A full viability update is being undertaken and will form part of the evidence base for the Regulation 19 Publication version of the SWDP Review.
228		1197380	B.8.10	Appendix B	Piper Homes	Piper Homes	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	Throckmorton to Pershore Railway station is a similar distance as Kempsey to Worcester Parkway. Giving Kempsey a positive rating and Throckmorton a negative one is inconsistent. Kempsey also has far more services than Throckmorton.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDP, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDP plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA Objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
229		1197380	B.8.10.1	Appendix B	Piper Homes	Piper Homes	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	The inclusion of Throckmorton on the basis of previous SA scores are misguided. The sort of modal transport shift assumed by the SA would be difficult to achieve on a significant scale in this location. Under the travel and transport category within the previous SA, Throckmorton scored a double negative. The potential to bring a few buses onto the site won't address the issue to the degree it is alleged in the SA. It is not clear why this site now performs better than it did. Evidence should be requested as to how it is financially viable for Throckmorton to be powered entirely by solar energy and that appropriate levels of battery storage is provided and that infrastructure will be able to cope with future electric car provision. If the evidence is not forthcoming then this factor shouldn't be given weight. It should be made clear to land promoters at Throckmorton that the solar farm would need to be delivered in addition to 40% GI provision and not instead of.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDP, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDP plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA Objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
230		1197380	c.3.3.1 and c.3.3.2	Appendix C	Piper Homes	Piper Homes	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	Affordable housing is only considered under SWDP14 and not under the health and wellbeing objective. The delivery of affordable housing would make a contribution to health and wellbeing where it would be delivered by a Registered Provider and for those at risk of homelessness, in inappropriate accommodation or those unable to afford their own home.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
231		1197380	2.16	Methodology	Piper Homes	Piper Homes	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	Paragraph 2.16 being assessed as a capacity matter rather than providing a range of housing needs readdressing.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
232		1197380	2.17 and 2.19	Methodology	Piper Homes	Piper Homes	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	There is no obvious link drawn between the generation of traffic from sites onto uncongested rural routes, as opposed to congested urban routes and strategic road network. More should be made of this in determining whether the strategy of dispersal - expansion of existing market towns and other settlements in rural locations would be more appropriate.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.







A	B	C	D	E	F	G	H	I	J	K	L	M
267		1196106	B.8.10	Introduction	2 Counties Construction	2 Counties Construction	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	Throckmorton to Pershore Railway station is a similar distance as Kempsey to Worcester Parkway. Giving Kempsey a positive rating and Throckmorton a negative one is inconsistent. Kempsey also has far more services than Throckmorton.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021. The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021. To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
268		1196106	C.3.3.1 and C.3.3.2	Introduction	2 Counties Construction	2 Counties Construction	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	Affordable housing is only considered under SWDP14 and not under the health and wellbeing objective. The delivery of affordable housing would make a contribution to health and wellbeing where it would be delivered by a Registered Provider and for those at risk of homelessness, in inappropriate accommodation or those unable to afford their own home.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
269		1196106	2.16	Methodology	2 Counties Construction	2 Counties Construction	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	Paragraph 2.16 being assessed as a capacity matter rather than providing a range of housing needs readdressing.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
270		1196106	2.17 and 2.19	Methodology	2 Counties Construction	2 Counties Construction	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	There is no obvious link drawn between the generation of traffic from sites onto uncongested rural routes, as opposed to congested urban routes and strategic road network. More should be made of this in determining whether the strategy of dispersal - expansion of existing market towns and other settlements in rural locations would be more appropriate.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
271		1196106	C.3.4	Appendix C	2 Counties Construction	2 Counties Construction	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	SWDPR15 has only been lightly assessed with no impact identified. This policy is concerning to medium and large housebuilders who will see it as a substantial constraint. Multiple contractors and vehicle movements could hamper delivery and little consideration has been given to the requirements of Registered Providers are promote numerous sites. They wouldn't wish to lose affordable homes in favour of self build plots to people who do not need an affordable home. Further consideration of this policy is needed.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
272		1196106	d.3	Appendix D	2 Counties Construction	2 Counties Construction	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	The SA assesses CF50855A&B against a quantum of development of 600 dwellings. We consider this is unachievable and consider further SA work will be required against this site as the magnitude of impact will not be correct.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
273		1196106		Appendix G	2 Counties Construction	2 Counties Construction	1241473	Rob Wall	Rob Wall	RCA Regeneration Ltd	We have considered the reasonable alternatives in the SA and note these should be assessed against the baseline economic, environmental and social characteristics and the likely situation were the plan not to be adopted. A number of reasonable alternatives are missing from the SA and it is not clear why these haven't been assessed. A number of plans have been subject to successful legal challenges on the grounds that reasonable alternatives were not adequately identified and/or appraised by the local planning authority during the plan preparation process including Calverton PC vs Nottingham CC; Heard vs Broadland DC, South Norfolk DC and Norwich City Council; Chiltern DC EWCA Civ 1393; Ashdown Forest Economic Development vs Wealden DC; Ashdown Forest Economic Development vs Wealden DC South Downs NPA; R. vs Welsh Ministers. Are disappointed that CF51062 has not been assessed within the SA. The fact the site was ruled out due to it becoming a Significant Gap for Parkway is at odds with the nature of the Significant Gap as the proposed SG includes existing dwellings. As such there is no clear reason was CF51062 was ruled out or considered as a reasonable alternative.	The SA process for the SWDPR has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Sustainability appraisal and strategic environmental assessment are tools used to assess the likely effects of the plan when judged against reasonable alternatives. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council (2012), Citation Number: [2012] EWHC 2542 (Admin). A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
275		1276781	SA3 and SA6	Methodology	FormulaLandLtd		1171743	brownrichard	Mr Richard Brown		SA Objective 3 and 6 Natural Resources and Provided ecological report to be clarify its impact.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
276		1276781	sa10	Methodology	FormulaLandLtd		1171743	brownrichard	Mr Richard Brown		Transport and accessibility report undertaken which the response on page 4 asks for the SA scoring to be reassessed based on the additional information.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
277	Bloor Homes (Western) Limited	1197567	SA2	Methodology	Bloor Homes (Western) Limited	Bloor Homes (Western) Limited	1276801	FelicityTozer	Felicity Tozer	Savills	The site is within Flood Zone 1 according to the Environment Agency maps. In work undertaken to support the initial SWDP, the site was identified as being subject to potential fluvial flooding, and this has been retained through to the SWDP Review evidence base. However, a previous planning application on the site (13/00283/OUT) confirmed that the Authorities flood risk model did not accord with local topography, and this was agreed with the Environment Agency through the planning application process. It is therefore not appropriate to use the out of date SFRA work in respect to this site.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
278	Bloor Homes (Western) Limited	1197567	SA4	Methodology	Bloor Homes (Western) Limited	Bloor Homes (Western) Limited	1276801	FelicityTozer	Felicity Tozer	Savills	If the only assessment of landscape is undertaken as part of the SA, and this affords a blanket significant adverse score to sites in the AONB which precludes their development, then the SA is not appropriately accounting for the need for all communities to deliver housing, and indeed, it may be that some development in the AONB represents a more sustainable strategy than the alternatives. Landscape and Visual Appraisal enclosed to give site specific assessment, but not based on a specific development proposal. Paragraph 5.9 of Landscape and Visual Appraisal - Development should arrange new built form to the west of the site where it closely and nestles against the existing settlement edge.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
280	Bloor Homes (Western) Limited	1197567	SA8 and SA10	Methodology	Bloor Homes (Western) Limited	Bloor Homes (Western) Limited	1276801	FelicityTozer	Felicity Tozer	Savills	The methodology underpinning the SA should be reconsidered given three years have passed since the initial consultation, and the plan itself is not likely to be adopted for another couple of years. In particular, consideration should be given in regard to accessibility standards (as per Table 2.4, Issue and Options SA) with the digitalisation of service changing significantly over the last three years. For example, the need for a physical GP appointment is much reduced, with the move to digital service provision.	Sustainability appraisal and strategic environmental assessment are tools used to assess the likely effects of the plan when judged against reasonable alternatives. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council (2012), Citation Number: [2012] EWHC 2542 (Admin). The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
281	Bloor Homes (Western) Limited	1197567	SA4	Methodology	Bloor Homes (Western) Limited	Bloor Homes (Western) Limited	1276801	FelicityTozer	Felicity Tozer	Savills	We are particularly concerned in regard to the robustness of the landscape assessment underpinning the SA. The earlier SA work indicates that the assessments have been desk-based for the most part, and a 'drive-over' in July 2019. Whilst we appreciate that there are challenges in compiling an appropriate evidence base for the local plan stage, we do not consider that in regard to landscape the assessment is sufficiently robust at this stage. For example, we note that the SA(III) scores a number of the major strategic sites as a minor adverse on landscape impact, which is the same assessment made in respect to a number of the smaller scale sites assessed in the plan.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.







A	B	C	D	E	F	G	H	I	J	K	L	M
288	316	1231694	D.3	Appendix D	Rooftop_Housing_Association	Rooftop_Housing_Association	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	The SA assesses CF50855A&B against a quantum of development of 600 dwellings. We consider this is unachievable and consider further SA work will be required against this site as the magnitude of impact will not be correct. It is unclear how the reasonable alternatives can be considered alternative if they have already been selected. CF50472zc was selected on account of location adjacent to the development boundary despite large parts of the site being at high risk of surface water flooding. Contrastingly our clients site as Land at Farm Lane, South Littleton has been rejected on account of its medium flood risk. This site has also been rejected on account as POS but the SWDP policies map does not show this. It is well positioned abutting the development boundary and would naturally expand the village. CF5383 has similar levels of surface water flooding to CF50472zc yet has not been selected as a reasonable alternative. This is inconsistent and CF50383 should be reconsidered. CF50383 is also rejected due to it being backland development, but Hanbury is dominated by backland development. Our clients site is well positioned and should be considered for development. CF50562 abuts only residential land and the Badesy Development Boundary but has been rejected. On the basis of it diminishing separation between Badesy and Aldington. The SA selects CF50844c and CF50102 as a reasonable alternative. This site clearly impedes onto Wyre Piddle which would eradicate the separation between Pershore and Wyre Piddle more to the extent that CF50562 does between Badesy and Aldington. CF50683 is adjacent to the development boundary and would appropriately expand Broadway. The site could retain separation between the village and the bypass. The SA also is inconsistent in assessing PROs across sites in Broadway. CF50683 would best serve Broadway.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
289	317	1242836	b.8.7.1	Appendix B	St Philips Land Ltd	St Philips Land Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	Has concerns that the housing objective for strategic sites only looks at housing delivery in capacity terms and there is no further examination of the likelihood of affordable housing delivering as a proportion of the figure. This is particularly relevant to Throckmorton which is largely previously developed and where infrastructure costs is a constraint to development. It isn't clear whether affordable housing can therefore be reduced on this site as a result of viability.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDP, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowledge) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDP plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A full viability update is being undertaken and will form part of the evidence base for the Regulation 19 Publication version of the SWDP Review.
290	318	1242836	b.8.10	Appendix B	St Philips Land Ltd	St Philips Land Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	Throckmorton to Pershore Railway station is a similar distance as Kempsey to Worcester Parkway. Giving Kempsey a positive rating and Throckmorton a negative one is inconsistent. Kempsey also has far more services than Throckmorton.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDP, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowledge) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDP plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
291	319	1242836	b.8.10.1	Appendix B	St Philips Land Ltd	St Philips Land Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	The inclusion of Throckmorton on the basis of previous SA scores are misguided. The sort of modal transport shift assumed by the SA would be difficult to achieve on a significant scale in this location. Under the travel and transport category within the previous SA, Throckmorton scored a double negative. The potential to bring a few buses onto the site won't address the issue to the degree it is alleged in the SA. It is not clear why this site now performs better than it did. Evidence should be requested as to how it is financially viable for Throckmorton to be powered entirely by solar energy and that appropriate levels of battery storage is provided and that infrastructure will be able to cope with future electric car provision. If the evidence is not forthcoming then this factor shouldn't be given weight. It should be made clear to land promoters at Throckmorton that the solar farm would need to be delivered in addition to 40% GI provision and not instead of.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDP, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowledge) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDP plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites.
292	320	1242836	c.3.3.1 and c.3.3.2	Appendix C	St Philips Land Ltd	St Philips Land Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	Affordable housing is only considered under SWDP14 and not under the health and wellbeing objective. The delivery of affordable housing would make a contribution to health and wellbeing where it would be delivered by a Registered Provider and for those at risk of homelessness, in inappropriate accommodation or those unable to afford their own home.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
293	321	1242836	2.16	Methodology	St Philips Land Ltd	St Philips Land Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	Paragraph 2.16 being assessed as a capacity matter rather than providing a range of housing needs readdressing.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
294	322	1242836	2.17 and 2.19	Methodology	St Philips Land Ltd	St Philips Land Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	There is no obvious link drawn between the generation of traffic from sites onto uncongested rural routes, as opposed to congested urban routes and strategic road network. More should be made of this in determining whether the strategy of dispersal - expansion of existing market towns and other settlements in rural locations would be more appropriate.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
295	323	1242836	c.4	Appendix C	St Philips Land Ltd	St Philips Land Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	SWDP15 has only been lightly assessed with no impact identified. This policy is concerning to medium and large householders who will see it as a substantial constraint. Multiple contractors and vehicle movements could hamper delivery and little consideration has been given to the requirements of Registered Providers are promote numerous sites. They wouldn't wish to lose affordable homes in favour of self build plots to people who do not need an affordable home. Further consideration of this policy is needed.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
296	324	1242836		Appendix G	St Philips Land Ltd	St Philips Land Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	We have considered the reasonable alternatives in the SA and note these should be assessed against the baseline economic, environmental and social characteristics and the likely situation were the plan not to be adopted. A number of reasonable alternatives are missing from the SA and it is not clear why these haven't been assessed. A number of plans have been subject to successful legal challenges on the grounds that reasonable alternatives were not adequately identified and/or appraised by the local planning authority during the plan preparation process including Calverton PC vs Nottingham CC; Heard vs Broadland DC, South Norfolk DC and Norwich City Council; Chiltern DC EWCA Civ 1393; Ashdown Forest Economic Development vs Wealden DC; Ashdown Forest Economic Development vs Wealden DC South Downs NPA; R. vs Welsh Ministers.	The SA process for the SWDP has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Sustainability appraisal and strategic environmental assessment are tools used to assess the likely effects of the plan when judged against reasonable alternatives. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council (2012), Citation Number: [2012] EWHC 2542 (Admin). A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
297	325	1242836	D.3	Appendix D	St Philips Land Ltd	St Philips Land Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	The SA assesses CF50855A&B against a quantum of development of 600 dwellings. We consider this is unachievable and consider further SA work will be required against this site as the magnitude of impact will not be correct. The only reasonable alternative put forward in Hartlebury are employment sites. CF50429 has not been assessed as a reasonable alternative presumably as the site is within the Green Belt. This should not immediately discount the site and it should have been included as a reasonable alternative. The site relates well to existing development and would provide a logical rounding off of the settlement. It is not significantly constrained by access and noise. More alternative sites should be included within the assessment. The only reasonable alternative in Droitwich Spa is CF50855A&B. CF50002 hasn't been assessed as a reasonable alternative or a suggested or rejected site presumably as the site is in the Green Belt. However, this should not automatically rule it out. The role and function of the Green Belt in this location focuses on openness and the site is adjacent to the development boundary and capable of delivering development should it be removed from the Green Belt as there are no physical constraints. Inclusion of the site would ensure that a suitable level of residential land is available in the town and it is less constrained in landscape and visual terms than other sites in the town and can integrate with the Pridor Road development. Without considering Green Belt sites within the SA, there is the risk of unsustainable patterns of development around Droitwich. We urge that more alternative sites are included in the assessment.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SA Directive and PPG requires that plan makers provide an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.

A	B	C	D	E	F	G	H	I	J	K	L	M
326		1196996	B.8.7.1	Appendix B	Limes Developments Ltd	Limes Developments Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	Has concerns that the housing objective for strategic sites only looks at housing delivery in capacity terms and there is no further examination of the likelihood of affordable housing delivering as a proportion of the figure. This is particularly relevant to Throckmorton which is largely previously developed and where infrastructure costs is a constraint to development. It isn't clear whether affordable housing can therefore be reduced on this site as a result of viability.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A full viability update is being undertaken and will form part of the evidence base for the Regulation 19 Publication version of the SWDP Review.
327		1196996	B.8.10	Introduction	Limes Developments Ltd	Limes Developments Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	Throckmorton to Pershore Railway station is a similar distance as Kempsey to Worcester Parkway. Giving Kempsey a positive rating and Throckmorton a negative one is inconsistent. Kempsey also has far more services than Throckmorton.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
328		1196996	B.8.10.1	Introduction	Limes Developments Ltd	Limes Developments Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	The inclusion of Throckmorton on the basis of previous SA scores are misguided. The sort of modal transport shift assumed by the SA would be difficult to achieve on a significant scale in this location. Under the travel and transport category within the previous SA, Throckmorton scored a double negative. The potential to bring a few buses onto the site won't address the issue to the degree it is alleged in the SA. It is not clear why this site now performs better than it did. Evidence should be requested as to how it is financially viable for Throckmorton to be powered entirely by solar energy and that appropriate levels of battery storage is provided and that infrastructure will be able to cope with future electric car provision. If the evidence is not forthcoming then this factor shouldn't be given weight. It should be made clear to land promoters at Throckmorton that the solar farm would need to be delivered in addition to 40% GI provision and not instead of.	The objective of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The SA process, which incorporates the requirements of the SEA Directive, leads to the preparation of a report in which the likely significant effects on the environment of implementing the SWDPR, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. Annex 1(h) of the Directive requires that the environmental report includes 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 knowhow) encountered in compiling the required information. Chapter 11 of the PPG1 states that reasonable alternatives need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The SWDPR plan making team has identified nine strategic development locations and supplied them to the SA team (see section 3.2 of the R18(III) SA Report, February 2021). Summary descriptions of each strategic location are available in Appendix B of the R18(III) SA Report, February 2021). The methodology which has been used to evaluate significant effects is presented in Chapter 2 of the R18(III) SA Report, February 2021). To help express significance, a system of scores is used to guide the reader. These must be read in conjunction with the assessment narrative. The ranking exercise has used a scale of numbers to help the reader understand which is the likely best performing site for that SA objective. These individual rankings by topic are then summed to provide an indication of best performing strategic location. Some strategic locations may have the same evaluation of scored significance for a given SA objective because the SA methodology is geared up to high level (strategic) assessment as required by the SEA Directive e.g. p.46 of the Reg 18(III) report. Any judgement about overall best performing site is high level. It is challenging to deliver an absolute evaluation of performance because of the strategic nature of the plan making and the different intrinsic qualities of the SEA topics listed in Annex 1(f) of the SEA Directive. These limitations to the ranking exercise are set out in section 3.4 of the R18 (III) SA Report. Numerical scoring of significance by totalling or any other means is deliberately resisted since the SA objectives represent different SEA topics, none of which can be summed together since they have different intrinsic qualities. Evaluation of significant effects uses the same methodology for strategic and non-strategic sites.
329		1196996	2.16	Methodology	Limes Developments Ltd	Limes Developments Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	Paragraph 2.16 being assessed as a capacity matter rather than providing a range of housing needs readdressing.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process.
330		1196996	c.3.3.1 and c.3.3.2	Appendix C	Limes Developments Ltd	Limes Developments Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	Affordable housing is only considered under SWDP14 and not under the health and wellbeing objective. The delivery of affordable housing would make a contribution to health and wellbeing where it would be delivered by a Registered Provider and for those at risk of homelessness, in inappropriate accommodation or those unable to afford their own home.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
331		1196996	2.17 and 2.19	Methodology	Limes Developments Ltd	Limes Developments Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	There is no obvious link drawn between the generation of traffic from sites onto uncongested rural routes, as opposed to congested urban routes and strategic road network. More should be made of this in determining whether the strategy of dispersal, expansion of existing market towns and other settlements in rural locations would be more appropriate.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
332		1196996	c.4	Appendix C	Limes Developments Ltd	Limes Developments Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	SWDPR15 has only been lightly assessed with no impact identified. This policy is concerning to medium and large householders who will see it as a substantial constraint. Multiple contractors and vehicle movements could hamper delivery and little consideration has been given to the requirements of Registered Providers are promote numerous sites. They wouldn't wish to lose affordable homes in favour of self build plots to people who do not need an affordable home. Further consideration of this policy is needed.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
333		1196996	Appendix D.3	Appendix D	Limes Developments Ltd	Limes Developments Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	The SA assesses CF50855A&B against a quantum of development of 600 dwellings. We consider this is unachievable and consider further SA work will be required against this site as the magnitude of impact will not be correct.	The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. Further information relating to site assessment work in the SWDP Review can be found in the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the accompanying detailed site assessment evidence base work. A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
334		1196996		Appendix G	Limes Developments Ltd	Limes Developments Ltd	1276803	VictoriaLane1	Ms Victoria Lane	RCA Regeneration Ltd	We have considered the reasonable alternatives in the SA and note these should be assessed against the baseline economic, environmental and social characteristics and the likely situation were the plan not to be adopted. A number of reasonable alternatives are missing from the SA and it is not clear why these haven't been assessed. A number of plans have been subject to successful legal challenges on the grounds that reasonable alternatives were not adequately identified and/or appraised by the local planning authority during the plan preparation process including Calverton PC vs Nottingham CC; Heard vs Broadland DC; South Norfolk DC and Norwich City Council; Chiltern DC EWCA Civ 1353; Ashdown Forest Economic Development vs Wealden DC; Ashdown Forest Economic Development vs Wealden DC South Downs NPA; R. vs Welsh Ministers. There appear to be no reasonable alternatives in Broadway with CF51064 selected and CF50923 rejected. CF50923 performed only marginally worse than CF51064 related to education. CF50923 should therefore be considered as a reasonable alternative and a reassessment is appropriate. Disagree that the site is disconnected from the village and CF51064 will have a greater impact on the AONB.	The SA process for the SWDPR has so far included several stages of SA and will continue to prepare as many more as are appropriate to help inform the plan. Nothing about the SA process is retrospective; all assessment information that is prepared is used by the plan makers to help shape the plan and seek to improve sustainability performance. There is no requirement to prepare the information in any particular order only to ensure that all proposals in the Local Plan have been appraised by the process and the findings explored transparently via public consultation. The SA process relies chiefly on secondary data. The high-level assessment process is pitched at the plan level. Assessment detail explored at the project scale through approaches such as landscape and visual impact assessment or ecological impact assessment is not typically sought. The level of detail and scrutiny at project level is quite different to high level assessment. The SA process uses evidence that has been prepared or outsourced by the Council to help inform policy preparation. Such evidence is usually plan-wide and is often high level. The SA process assesses all sites in the same way using the same information. Where detailed evidence is available from site promoters for a given site, the SA process will engage with such evidence but also be clear to avoid any bias and be transparent in the reporting process. The SEA Directive and PPG requires that plan makers prepare an outline of the reasons for selection and rejection of plan content. Information to be prepared as part of the environmental report should include 'an outline of the reasons for selecting the alternatives dealt with'. See Annex 1(h) of the SEA Directive. Sustainability appraisal and strategic environmental assessment are tools used to assess the likely effects of the plan when judged against reasonable alternatives. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings. The requirements of the SEA Directive for an environmental report are distinct. In terms of sequencing the plan making, including the preparation of the sustainability appraisal, it is helpful to prepare sustainability appraisal information on an iterative basis so that the plan makers can take account of SA findings. This is the basis on which more than one SA report is prepared at different stages of the plan making process. Case Law has established that it is possible to publish SA information at various stages in the plan making process so long as it is subject to the proper transparency, in other words consultation, with stakeholders, statutory consultees and the public. See Cogent Land LLP v Rochford District Council (2012). Citation Number: [2012] EWHC 2542 (Admin). A public consultation on the Publication version of the SWDP Review will be carried out later in 2022 where you will have the opportunity to comment on a wider range of matters relating to the production of the plan and site allocations.
335		1277025		Introduction	WAHT	Worcestershire Acute Hospital Trust	1277024	Alex_Roberts	Mr Alex Roberts	DLP Planning Ltd	No comments made.	No comments made.





