

Sustainability Appraisal and Strategic Environmental Assessment of the South Worcestershire Development Plan Review 2021-2041

Post Adoption Statement

April 2026



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal and Strategic Environmental Assessment of the South Worcestershire Development Plan Review 2021-2041

Post-Adoption Statement

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Acronyms and abbreviations

AIR	Area of Informal Recreation
ALC	Agricultural Land Classification
BMV	Best and Most Versatile
DLUHC	Department for Levelling Up, Housing & Communities
EDNA	Economic Development Needs Assessment
EqIA	Equality Impact Assessment
GI	Green Infrastructure
GP	General Practitioner
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
LSOA	Lower Layer Super Output Areas
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PPG	Planning Practice Guidance
RTPI	Royal Town Planning Institute
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SWAMR	South Worcestershire Authorities Monitoring Report
SWC	South Worcestershire Councils
SWDP	South Worcestershire Development Plan
SWDPR	South Worcestershire Development Plan Review

1 Introduction

1.1 Context and purpose of this report

- 1.1.1 This report comprises the Sustainability Appraisal (SA) Post-Adoption Statement for the South Worcestershire Development Plan Review (SWDPR) 2021-2041. This report has been prepared under Regulation 16 of the Strategic Environmental Assessment (SEA) Regulations (SI 1633) 2004¹.
- 1.1.2 The SWDPR has been prepared by the South Worcestershire Councils (SWC), which is comprised of Malvern Hills District Council, Worcester City Council and Wychavon District Council. The aim of the SWDPR is to review existing planning policy documents and determine the development needed within the plan area up to 2041. The SWDPR sets out the overall development strategy to guide future development in South Worcestershire, providing homes and jobs to meet the needs of the area, whilst protecting the environment and promoting sustainability.
- 1.1.3 The SWDPR was adopted on 26th March 2026² following formal approval by each local authority on 24th and 25th March.
- 1.1.4 During the preparation of the SWDPR, the Councils were required to carry out an SA of the Plan. SA is a statutory process incorporating the requirements of the SEA Directive³.
- 1.1.5 The purpose of this Post-Adoption Statement is to outline how the SA/SEA process has informed and influenced the process of preparing the SWDPR, and to demonstrate how consultation on the SA/SEA has been taken into account.

1.2 The South Worcestershire area

- 1.2.1 South Worcestershire comprises three local authorities: Malvern Hills District, Wychavon District and Worcester City. The area lies on the southern edge of the West Midlands, bordering the South West. It is predominantly rural in character, with a network of market towns. Worcester is the main urban centre and largest settlement, followed by Great Malvern, Droitwich Spa and Evesham (see **Figure 1.1**).
- 1.2.2 The area is characterised by distinctive landscapes, including the Malvern Hills and Cotswolds National Landscapes, alongside river valleys (Avon, Severn and Teme) and notable historic features such as Worcester Cathedral and the historic town centres.
- 1.2.3 South Worcestershire benefits from good strategic transport connections, although rural accessibility remains an issue. Worcester and the main towns are the primary employment locations.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 01/04/26]

² South Worcestershire Development Plan Review Adopted March 2026. Available at: <https://www.swdevelopmentplan.org/latest-news/adoption-of-the-south-worcestershire-development-plan-review-2021-2041> [Date accessed: 07/06/26]

³ SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date accessed: 01/04/26]

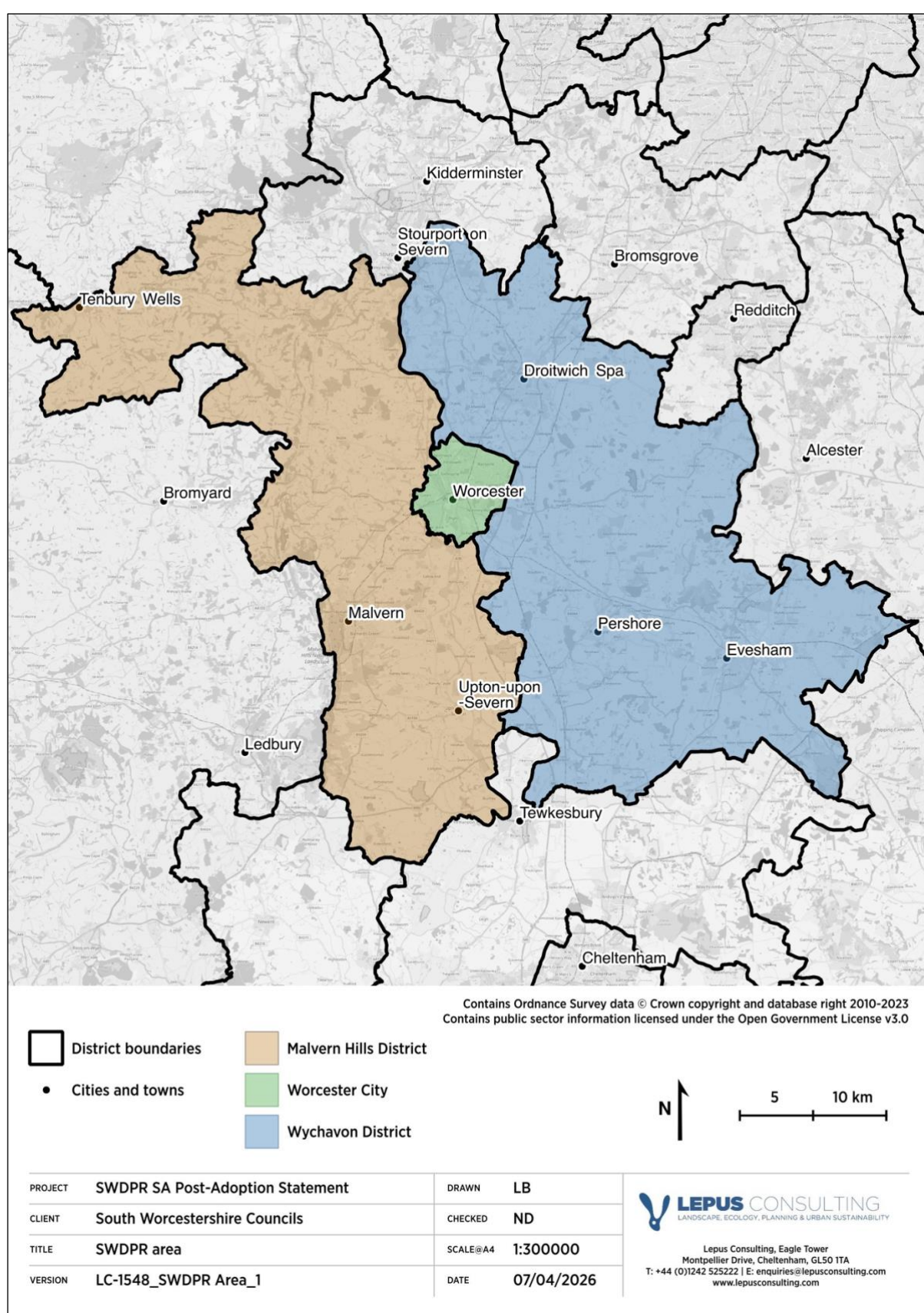


Figure 1.1: The South Worcestershire Development Plan Review area

1.3 About the SWDPR

- 1.3.1 In line with Government requirements that local plans should be reviewed every five years and updated as necessary, the SWCs undertook a review of the previous SWDP (2016) and determined that a whole plan review was required, which commenced in late 2017.
- 1.3.2 The purpose of the SWDPR is to review existing planning policy documents and determine the development needed within the Plan area for the period 2021-2041. It includes an overall development strategy, a vision for the future, relevant objectives, site allocations and site-based policies, as well as development management policies which will guide the determination of planning applications.
- 1.3.3 The vision of the SWDPR aims to ensure that South Worcestershire remains a highly desirable place in which to live, work and visit in 2041, with vibrant towns, improved infrastructure and accessibility, and is a place where climate change is proactively addressed. The SWDPR seeks to ensure a range of housing types and tenures are delivered, a skilled workforce is supported, and that high quality development incorporates environmentally friendly solutions and investment in green infrastructure.
- 1.3.4 The SWDPR comprises primarily of 73 policies, including 11 strategic policies, and a series of thematic / non-strategic policies under the following headings:
- economic growth;
 - housing;
 - environmental enhancement and protection;
 - climate change and resource management;
 - environmental quality and resources;
 - tourism, leisure and community facilities;
 - site allocations; and
 - implementation and monitoring.

1.4 Requirement for the Post-Adoption Statement

- 1.4.1 In order to meet the legislative requirements of the European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes (2004), a Post-Adoption Statement is required to be published “as soon as reasonably possible after the Plan has been adopted”⁴.
- 1.4.2 SEA Regulation 16⁵ sets out the post-adoption procedures, including the requirement to produce a statement containing a number of particulars (Regulation 16 Paragraph 4). **Box 1.1** presents the requirements of this SA/SEA Post-Adoption Statement.
- 1.4.3 Following best practice guidance, the SEA has been incorporated into the SA of the SWDPR. This Post-Adoption Statement therefore provides sustainability information beyond the strict environmental parameters outlined in **Box 1.1**, to reflect the broader SA process.

⁴ RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 01/04/26]

⁵ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/part/4/made> [Date accessed: 01/04/26]

Box 1.1: SEA Regulation 16 Post-Adoption Procedures

Information as to adoption of plan or programme

16.—

- 1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall—
 - a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and
 - b) take such steps as it considers appropriate to bring to the attention of the public—
 - i) the title of the plan or programme;
 - ii) the date on which it was adopted;
 - iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained;
 - iv) the times at which inspection may be made; and
 - v) that inspection may be made free of charge.
- 2) As soon as reasonably practicable after the adoption of a plan or programme—
 - a) the responsible authority shall inform—
 - i) the consultation bodies;
 - ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and
 - iii) where the responsible authority is not the Secretary of State, the Secretary of State; and
 - b) the Secretary of State shall inform the Member State with which consultations in relation to the plan or programme have taken place under regulation 14(4), of the matters referred to in paragraph (3).
- 3) The matters are—
 - a) that the plan or programme has been adopted;
 - b) the date on which it was adopted; and
 - c) the address (which may include a website) at which a copy of—
 - i) the plan or programme, as adopted,
 - ii) its accompanying environmental report, and
 - iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.
- 4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are —
 - a) how environmental considerations have been integrated into the plan or programme;
 - b) how the environmental report has been taken into account;
 - c) how opinions expressed in response to—
 - i. the invitation referred to in regulation 13(2)(d);
 - ii. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
 - d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
 - e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
 - f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

1.5 Using this document

- 1.5.1 This Post-Adoption Statement should be read alongside the SWDPR (2021-2041)⁶ and associated SA documents, which are summarised in **Chapter 2** and can be found on the SWDPR website⁷.
- 1.5.2 This report has been prepared in order to meet the requirements of the SEA Regulations (see **Box 1.1**). The chapters are structured as per the criteria presented in the Regulations, as shown in **Table 1.1**.

Table 1.1: Guide to the requirements of the SEA Regulations for this Post-Adoption Statement

Requirements of Regulation 16 (4)	Location in this report
a) how environmental considerations have been integrated into the plan or programme;	Chapter 2 (the SA Framework)
b) how the environmental report has been taken into account;	Chapter 4
c) how opinions expressed in response to— a. the invitation referred to in regulation 13(2)(d); b. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;	Chapter 5
d) how the results of any consultations entered into under regulation 14(4) have been taken into account;	Chapter 5
e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;	Chapter 3
f) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	Chapter 6

⁶ SWDPR (2026) Available at: <https://www.swdevelopmentplan.org/filelink/fileman-files/SWDPR%20Adopted%20Plan%2026%20March%202026/South%20Worcestershire%20Development%20Plan%20Review%20-%20Adopted%20March%202026.pdf> [Date accessed: 07/04/26]

⁷ South Worcestershire Development Plan. Available at: <https://www.swdevelopmentplan.org/> [Date accessed: 07/04/26]

2 Overview of the assessment process

2.1 Integrated approach to SA and SEA

- 2.1.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 2.1.2 The SEA Directive applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective is to ensure a high level of environmental protection and to integrate environmental considerations into plan-making to promote sustainable development.
- 2.1.3 The SEA Directive has been transposed into English law by the SEA Regulations. Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the SWDPR to be subject to SEA throughout its preparation.
- 2.1.4 SA is a UK-specific, legally required process as specified by S19(5) of the Planning and Compulsory Purchase Act 2004⁸ and should include an appraisal of the economic, social and environmental sustainability of development plans. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.
- 2.1.5 The SA/SEA of the SWDPR was also prepared to incorporate Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA). HIAs evaluate how developments may affect human health, identifying potential risks and benefits, although they are not legally required. EqIAs, required under the Equality Act 2010, ensure that policies and plans do not discriminate and promote equality for protected groups.

2.2 Best practice guidance

- 2.2.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance including the following:
- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment⁹.
 - Office of the Deputy Prime Minister (ODPM) (2005) A Practical Guide to the SEA Directive¹⁰.

⁸ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 01/04/26]

⁹ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 01/04/26]

¹⁰ ODPM (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date accessed: 01/04/26]

- Department for Levelling Up, Housing & Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)¹¹.
- DLUHC and Ministry for Housing, Communities & Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)¹².
- Royal Town Planning Institute (RTPI) (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans¹³.

2.3 SA and the sequential plan-making process

2.3.1 The SA (incorporating SEA) process has accompanied and informed the plan-making process on an iterative basis. The key SA outputs prepared alongside the stages of SWDPR preparation, and consultation dates where applicable, are summarised in **Table 2.1**.

Table 2.1: Timeline of SA reports in conjunction with SWDPR preparation

Date	SWDPR Stage	Sustainability Appraisal
June – August 2018	Plan-making commences.	SA Scoping Report (August 2018) ¹⁴ This report set the criteria for assessment, established the baseline data and provided an overview of key sustainability issues.
November – December 2018	Issues and Options Consultation The Issues and Options document outlined the main issues the SWCs identified for the new plan, assessed whether the current development strategy remains appropriate, and identified which previous adopted SWDP policies require revision.	Regulation 18 Issues and Options SA Report (October 2018) ¹⁵ This report assessed the SWDPR options for housing number, development strategy, housing distribution, employment distribution and development management policies.

¹¹ The SWDPR was prepared under the NPPF (September 2023). DLUHC (2023) National Planning Policy Framework. Available at: <https://webarchive.nationalarchives.gov.uk/ukgwa/20230929144819/https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 07/04/26]

¹² DLUHC and MHCLG (2023) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 07/04/26]

¹³ RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 01/04/26]

¹⁴ Lepus Consulting (2018) Sustainability Appraisal of the SWDPR: Scoping Report. Available at: https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Evidence%20Base/SA%20and%20HRA/LC-361_SWDP_SA_Scoping_8_030818JE.compressed.pdf?routed=1&container=fileman-files [Date accessed: 07/04/26]

¹⁵ Lepus Consulting (2018) Sustainability Appraisal of the SWDPR: Issues and Options Report. Available at: <https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Evidence%20Base/SA%20and%20HRA/Issues-and-Options-Final-SA-Report.pdf?routed=1&container=fileman-files> [Date accessed: 07/04/26]

Date	SWDPR Stage	Sustainability Appraisal
November – December 2019	Preferred Options Consultation This document presented the Councils' preferred options for sites and policies.	Regulation 18 (II) SA Report (September 2019) ¹⁶ This report contained an assessment of 503 reasonable alternative sites. The likely impact of the proposed development at each site was assessed pre-mitigation and post-mitigation, with the consideration of the draft SWDPR policies.
March – April 2021	Further Preferred Options Consultation This consultation provided further information relating to the SA process for the SWDPR and accompanied the work carried out for the Regulation 18 (II) stage SA Report.	Regulation 18 (III) SA Report (February 2021) ¹⁷ This report included an assessment of nine reasonable alternative strategic locations, 48 draft SWDPR policies, 41 additional reasonable alternative sites and 79 reallocated sites. The SA report also set out the reasons for selecting and rejecting reasonable alternative sites.
November – December 2022	Regulation 19 Publication SWDPR This consultation set out the final draft of the SWDPR prepared by the SWCs before it was submitted to the Planning Inspectorate for Examination.	Regulation 19 SA Report (September 2022) ¹⁸ This report was prepared to meet the requirements of an SEA Environmental Report. It included the evaluation of 65 SWDPR policies and proposed allocations, as well as 106 additional reasonable alternative sites, an update to the assessment of two strategic locations, six Areas of Informal Recreation (AIRs) and 12 renewable energy sites that had come forward since the previous consultation.
December 2024	Examination of the SWDPR.	Addendum to the Regulation 19 SA: Areas of Informal Recreation (December 2024) ¹⁹ An SA Addendum was prepared to assess updated information relating to AIRs and new reasonable alternatives identified by the SWCs to inform the SWDPR Examination.

¹⁶ Lepus Consulting (2019) Sustainability Appraisal of the SWDPR, Regulation 18 (II) SA Report. Available at: https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Evidence%20Base/SA%20and%20HRA/PO%20LC-503_SWDPR_SA_Reg18II_7_171019LB.pdf?routed=1&container=fileman-files [Date accessed: 07/04/26]

¹⁷ Lepus Consulting (2021) Sustainability Appraisal of the SWDPR, Regulation 18 (III) SA Report. Available at: <https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Reg%2018%203%20SA%20Consultation/SWDPR%20R18%28III%29%20Sustainability%20Appraisal%20Report%20FINAL.pdf?routed=1&container=fileman-files> [Date accessed: 07/04/26]

¹⁸ Lepus Consulting (2022) Sustainability Appraisal of the SWDPR 2021-2041: Publication Version. Regulation 19 SA Report. Volume 1, 2 and 3. September 2022. Available at: https://www.localplanservices.co.uk/files/uqgd/017f5b_19e30f5f40f54a6990cbff70df85c923.pdf [Date accessed: 07/04/26]

¹⁹ Lepus Consulting (2024) Sustainability Appraisal of the SWDPR: Addendum to the Regulation 19 SA Report concerning Areas of Informal Recreation. December 2024. Available at: https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/uqgd/017f5b_067d8ab1f5a745b5bb415c988535a25b.pdf [Date accessed: 07/04/26]

Date	SWDPR Stage	Sustainability Appraisal
January – February 2026	Main Modifications Schedules of proposed Main Modifications to the submitted version of the SWDPR to address the matters raised during the Examination, in particular the inspectors' post-hearing letter.	SA of the Main Modifications (December 2025) ²⁰ This report was prepared to evaluate the proposed modifications to the SWDPR following the examination process, including nine new SWDPR policies and other modified policies.

2.4 SA Framework

- 2.4.1 The SA process used an SA Framework to appraise the SWDPR as it evolved. The purpose of the SA Framework is to provide a way of ensuring that the Local Plan preparation process considers the environmental, social and economic impacts of the proposed site allocations and policies on the various environmental, social and economic receptors located in and around the borough. The SA Framework offers a consistent and robust means of description, analysis and comparison for these impacts.
- 2.4.2 The SA Framework for the SWDPR consists of 12 sustainability objectives, which can be measured using a range of indicators. The SA Objectives were largely informed by topics of Annex I (f) of the SEA directive (Schedule 2 of the SEA Regulations)²¹, alongside other relevant national, regional and local plans, programmes and key issues, enabling a thorough and meaningful SA.
- 2.4.3 The SA Objectives included within the SA Framework are set out in **Table 2.2**.

²⁰ Lepus Consulting (2025) Sustainability Appraisal of the SWDPR: SA of the Main Modifications. December 2025. Available at: <https://www.swdevelopmentplan.org/swdp-review/swdp-review-main-modifications-consultation> [Date accessed: 07/04/26]

²¹ Biodiversity flora and fauna; Population; Human health; Soil; Water; Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

Table 2.2: Objectives of the SA Framework

No.	SA Objective	Relevance to SEA Regulations
1	Climate Change Mitigation: Minimise South Worcestershire's contribution to climate change.	Climatic factors.
2	Climate Change Adaptation: Plan for the anticipated impacts of climate change.	Climatic factors, soil, water.
3	Biodiversity and Geodiversity: Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of South Worcestershire.	Biodiversity, flora and fauna.
4	Landscape and Townscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening its distinctiveness.	Landscape.
5	Pollution and Waste: Reduce waste generation, increase the reuse and recycling of materials whilst minimising the extent and impacts of water, air and noise pollution.	Air, water, soil and human health.
6	Natural Resources: Protect, enhance and ensure the efficient use of South Worcestershire's land, soils and water.	Soil, water and material assets.
7	Housing: Provide a range of housing to meet the needs of the community.	Population.
8	Health and Wellbeing: Safeguard and improve physical and mental health of residents.	Human health and population.
9	Cultural Heritage: Conserve, enhance and manage sites, features and areas of historic and cultural importance, including their setting.	Cultural heritage.
10	Transport and Accessibility: Improve choice and efficiency of sustainable transport in SW and reduce the need to travel.	Climatic factors and material assets.
11	Education: Improve education, skills and qualifications in South Worcestershire.	Population.
12	Economy and Employment: Support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	Population and material assets.

2.4.4 The likely adverse and positive sustainability effects of the SWDPR as identified in the various SA reports are presented in **Chapter 4** (see **Tables 4.1** and **4.2**).

2.4.5 The SA methodology, as set out in Chapter 4 and Appendix D of the Regulation 19 SA Report (2022)²², included a number of topic-specific methodologies and assumptions relating to each of the SA Objectives.

²² Lepus Consulting (2022) Sustainability Appraisal of the SWDPR 2021-2041: Publication Version. Regulation 19 SA Report. Volume 1, 2 and 3. September 2022. Available at: https://www.localplanservices.co.uk/files/ugd/017f5b_19e30f5f40f54a6990cbff70df85c923.pdf [Date accessed: 07/04/26]

2.5 Habitats Regulations Assessment

- 2.5.1 The SWDPR was subject to a Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)²³.
- 2.5.2 Following Stage 1 (screening), likely significant effects (LSEs) arising from policies and allocations within the SWDPR were identified at the following European sites:
- Bredon Hill Special Area of Conservation (SAC) – Public access and disturbance;
 - Lyppard Grange Ponds SAC – Public access and disturbance and water quality;
 - River Wye SAC – Public access and disturbance and air quality;
 - Walmore Common Special Protection Area (SPA) – Water quality;
 - Walmore Common Ramsar – Water quality;
 - Fens Pools SAC – Air quality;
 - River Clun SAC – Functionally linked land;
 - Severn Estuary SAC – Water quality and functionally linked land;
 - Severn Estuary SPA – Water quality and functionally linked land; and
 - Severn Estuary Ramsar – Water quality and functionally linked land.
- 2.5.3 Stage 2 (Appropriate Assessment) was then undertaken at the Regulation 19 stage²⁴ to assess LSEs in detail for each screened in European site (and associated areas of Functionally Linked Land) in view of its conservation objectives due to a change in air quality, water quality, recreational pressure and urbanisation effects. The Appropriate Assessment took into consideration mitigation measures included within policy wording, the hierarchical nature of plan making and concluded that the SWDPR would have no adverse impact on site integrity either alone or in-combination on any European site.
- 2.5.4 In December 2025, the proposed Main Modifications were assessed in the HRA process²⁵. On the basis of the protective and mitigation wording included in the SWDPR policies, it was concluded that the Main Modifications will not give rise to adverse impacts on the site integrity of any European site, either alone or in combination with other plans or projects.

²³ The Conservation of Habitats and Species Regulations (2017) SI No. 2017/1012, TSO (The Stationery Office), London.

²⁴ Lepus Consulting (2022) Habitats Regulations Assessment of the SWDPR Publication Version HRA Report. Available at: <https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Evidence%20Base/SA%20and%20HRA/SWDPR%20Reg%2019%20HRA%20Volume%201%20of%202%20-%20Main%20Report%20%28Oct%202022%29.pdf?routed=1&container=fileman-files> [Date accessed: 07/04/26]

²⁵ Lepus Consulting (2025) Habitats Regulations Assessment of the SWDPR: HRA of the Main Modifications. December 2025. Available at: <https://www.swdevelopmentplan.org/swdp-review/swdp-review-main-modifications-consultation> [Date accessed: 07/04/26]

3 Why the adopted plan was chosen, in light of reasonable alternatives

3.1 Reasonable alternatives

- 3.1.1 The SA needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach. These should be assessed against the baseline environmental, economic and social characteristics of the area, as well as the likely scenario if the plan is not adopted. Reasonable alternatives are the realistic options considered by the plan-maker when developing policies. They must be sufficiently distinct to allow meaningful comparisons of their sustainability effects.
- 3.1.2 At each stage of the SWDPR plan-making process, different reasonable alternatives were identified, described and evaluated through the SA process.
- 3.1.3 All reasonable alternatives have been prepared by the Council's plan makers, informed by consultation and stakeholder engagement. These covered a range of plan components, including (but not limited to) housing and employment requirements, spatial strategy options, strategic and non-strategic development sites, Areas of Informal Recreation (AIRs) and renewable energy sites as set out in **sections 3.2 – 3.7** below.

3.2 Housing and employment numbers

- 3.2.1 The Issues and Options SA²⁶ assessed a housing requirement of 13,998 dwellings based on the Government's standard methodology and existing commitments. No alternative housing numbers were identified by the SWCs. The assessment identified major positive impacts for housing (meeting local need) and major negative impacts for climate change mitigation, pollution, and waste, while impacts on other SA Objectives were largely uncertain, depending on site-specific distribution and service capacity.
- 3.2.2 The Regulation 18(III) SA²⁷ assessed draft Policy SWDPR 1, proposing 13,957 dwellings and 295ha of employment land. No alternative employment options were considered, with employment needs derived from the Economic Development Needs Assessment (EDNA). The appraisal identified major positive impacts for housing and the economy, major negative impacts for climate change mitigation, pollution, and natural resources, minor negative impacts for health and transport, and uncertain impacts on climate adaptation, biodiversity, landscape, heritage, and education.
- 3.2.3 At Regulation 19²⁸, Policy SWDPR 2 updated the housing requirement to at least 26,360 dwellings (13,498 from proposed allocations) and 362.45 ha of employment land. Although overall provision increased, the sustainability performance remained broadly similar to earlier stages due to the strategic nature of the appraisal.

²⁶ Lepus Consulting (2018) Sustainability Appraisal of the SWDPR: Issues and Options Report. Available at: <https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Evidence%20Base/SA%20and%20HRA/Issues-and-Options-Final-SA-Report.pdf?routed=1&container=fileman-files> [Date accessed: 07/04/26]

²⁷ Lepus Consulting (2021) Sustainability Appraisal of the SWDPR, Regulation 18 (III) SA Report. Available at: <https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Reg%2018%20SA%20Consultation/SWDPR%20R18%28III%29%20Sustainability%20Appraisal%20Report%20FINAL.pdf?routed=1&container=fileman-files> [Date accessed: 07/04/26]

²⁸ Lepus Consulting (2022) Sustainability Appraisal of the SWDPR 2021-2041: Publication Version. Regulation 19 SA Report. Volume 1, 2 and 3. September 2022. Available at: https://www.localplanservices.co.uk/files/ugd/017f5b_19e30f5f40f54a6990cbff70df85c923.pdf [Date accessed: 07/04/26]

- 3.2.4 In the adopted SWDPR, Policy SWDPR 02 confirms delivery of 18,852 dwellings (between 1st April 2025 and 31st March 2041) and 313.80ha of employment land (2021-2041), reflecting the latest housing and employment land supply information.

3.3 Spatial strategy

- 3.3.1 Four reasonable alternative development strategy options were identified by the SWCs and assessed in the Issues and Options SA Report²⁹:

- A) Rail station focused development;
- B) Dispersed development;
- C) Increasing densities through regeneration; and
- D) Large urban extensions.

- 3.3.2 Options A and C were identified as the best performing options in the SA. Option A was considered likely to deliver greater benefits in relation to the local landscape, educational opportunities and, in particular, sustainable transport within South Worcestershire. Option C was expected to provide benefits in respect of flood risk, biodiversity assets and natural resources. On this basis, it was considered that a combination of both strategies could potentially result in a greater overall range of sustainability benefits.

- 3.3.3 The chosen Spatial Strategy, as presented in Policy SWDPR 03, is driven by the SWDPR Vision, the SA outputs and technical evidence. It brings together land use, development and infrastructure considerations that flow from the economic, environmental and social characteristics of the area to deliver housing in accordance with the settlement hierarchy and focusing the majority of new development in areas that have, or can deliver, more sustainable travel connections.

3.4 Strategic development sites

- 3.4.1 Nine reasonable alternative strategic locations were identified by the SWCs which could potentially accommodate upwards of 900 dwellings over the Plan period:

- Land south of 'Worcester South' (Kempsey);
- Land west of 'Worcester West' (Lower Broadheath);
- Rushwick;
- Throckmorton Airfield (Throckmorton);
- Worcestershire Parkway;
- Land at Mitton (Mitton);
- Land south west of Evesham (Hinton on the Green);
- Land at Hanley Castle; and
- Strensham.

²⁹ Lepus Consulting (2018) Sustainability Appraisal of the SWDPR: Issues and Options Report. Available at: <https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Evidence%20Base/SA%20and%20HRA/Issues-and-Options-Final-SA-Report.pdf?routed=1&container=fileman-files> [Date accessed: 07/04/26]

- 3.4.2 These nine locations were assessed in the Regulation 18 (III) SA³⁰ and updated in the Regulation 19 SA³¹, and 'ranked' by SA Objective to help the SWCs determine which locations perform best in sustainability terms. Worcestershire Parkway emerged as the overall best performing location, followed by Kempsey and Mitton. Throckmorton and Rushwick achieved identical overall ranks, followed by Lower Broadheath. However, there was limited variation in ranking between Mitton, Rushwick, Kempsey, Throckmorton and Lower Broadheath. The lowest ranked locations, and therefore potentially the least sustainable options, were Hanley Castle, Hinton on the Green and Strensham.
- 3.4.3 Following consideration of the SA findings, as well as other evidence base studies, the SWCs have selected three strategic development sites for allocation in the SWDPR, each of which are allocated through a SWDPR Policy as follows:
- SWDPR 55 (Worcestershire Parkway);
 - SWDPR 56 (Rushwick Expanded Settlement); and
 - SWDPR 57 (Mitton).
- 3.4.4 During the production of the SWDPR, land at Throckmorton was also proposed as a strategic development site but was removed from the SWDPR as a result of the Inspectors' findings following Examination in Public.
- 3.4.5 These strategic allocations were considered the best options to develop new or expanded settlements in areas in proximity to existing, or with potential to build new, strategic transport infrastructure including train stations.

3.5 Non-strategic development sites

- 3.5.1 A total of 728 reasonable alternative non-strategic sites have been identified, described and evaluated throughout the iterative Plan-making process (at the Regulation 18 (II), Regulation 18 (III) and Regulation 19 SA stages).
- 3.5.2 The SA identified both positive and adverse impacts of the reasonable alternative sites on the SA Objectives. Negative impacts were mainly associated with the rural character of much development, including loss of undeveloped land and 'best and most versatile' (BMV) soil, increased carbon emissions, reduced air quality, and limited access to social facilities such as schools, healthcare, shops, and transport. Positive impacts included new housing and employment floorspace, health and accessibility benefits due to proximity to public greenspaces, Public Rights of Way, and cycle routes, and strong climate change adaptation potential, as many sites are in Flood Zone 1 with low fluvial flood risk.
- 3.5.3 Following consideration of the SA findings, as well as other evidence base studies such as viability assessments, the SWCs have selected a range of non-strategic development sites for allocation in the SWDPR. These sites are allocated through various SWDPR policies, some of which were introduced or modified during the Main Modifications process:
- SWDPR 58 (Cales Farm, Malvern);
 - SWDPR 59 (North East Malvern, Newland);
 - SWDPR 60 (Land South of Madresfield Road, Malvern);
 - SWDPR 61 (Land on the South Side of Guarford Road, Malvern);

³⁰ Lepus Consulting (2021) Sustainability Appraisal of the SWDPR, Regulation 18 (III) SA Report. Available at: <https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Reg%2018%203%20SA%20Consultation/SWDPR%20R18%28III%29%20Sustainability%20Appraisal%20Report%20FINAL.pdf?routed=1&container=fileman-files> [Date accessed: 07/04/26]

³¹ Lepus Consulting (2022) Sustainability Appraisal of the SWDPR 2021-2041: Publication Version. Regulation 19 SA Report. Volume 1, 2 and 3. September 2022. Available at: https://www.localplanservices.co.uk/files/ugd/017f5b_19e30f5f40f54a6990cbff70df85c923.pdf [Date accessed: 07/04/26]

- SWDPR 62 (Land at Mayfield Road, Malvern);
- SWDPR 63 (Land at Hanbury Road, Droitwich Spa);
- SWDPR 64 (Land at Union Lane, Droitwich Spa);
- SWDPR 65 (Land at Navigation Road, Diglis, Worcester);
- SWDPR 66 (Three Counties Showground);
- SWDPR 68 (Directions for Growth Outside the City Administrative Boundary: Existing Urban Extensions to be Reallocated);
- SWDPR 69 (Worcester City Allocations);
- SWDPR 70 (Malvern Hills Allocations); and
- SWDPR 71 (Wychavon Allocations).

3.6 Areas of Informal Recreation

3.6.1 The SWCs initially identified six reasonable alternative locations for the development of 'Areas of Informal Recreation' (AIRs) to increase the amount of natural green space available to local residents, which were appraised in the Regulation 19 SA (Appendix H)³²:

- AIR 1 (CP005a, CP005d, CP005e) – Area of Hill Court Farm, Hill, Pershore;
- AIR 2 (CP010b) – Ashmores Farm, Evesham Road, Norton and New Farm, Harvington Lane, Norton;
- AIR 3 (CP006c, CP006d) – Various locations;
- AIR 4 (CP006f, CP006h, CP006i) – Various locations;
- AIR 5 (CP003) – Land south of Jennet Tree Lane; and
- AIR 6 (CP001) – Lower Hall Farm, Doverdale Lane, Hampton Lovett, Droitwich.

3.6.2 Following submission of the SWDPR, two further reasonable alternative AIR locations were identified and updated information became available for one of the previously evaluated AIRs. As such, an SA Addendum³³ was prepared to evaluate the three up-to-date reasonable alternative AIRs:

- AIR 7 (CP006f) – Land north-east of Blenheim Farm, Honeybourne;
- AIR 8 (CP007) – Land to the west of Leigh Sinton; and
- AIR 9 (CP0018) – Land at Cowleigh Road, Malvern.

3.6.3 Positive effects were anticipated for health and wellbeing through increased access to greenspace at each location, while potential negative impacts on biodiversity and uncertain effects on the Malvern Hills National Landscape were identified at some sites.

3.6.4 Following consideration of the SA assessment findings and through consultation with Natural England, taking into account considerations including land constraints, flood risk, access, heritage and landscape, one AIR (AIR 7 at Honeybourne) has been allocated through Policy SWDPR 32, while support is set out for further AIRs to come forward.

³² Lepus Consulting (2022) Sustainability Appraisal of the SWDPR 2021-2041: Publication Version. Regulation 19 SA Report. Volume 1, 2 and 3. September 2022. Available at: https://www.localplanservices.co.uk/files/ugd/017f5b_19e30f5f40f54a6990cbff70df85c923.pdf [Date accessed: 07/04/26]

³³ Lepus Consulting (2024) Sustainability Appraisal of the SWDPR: Addendum to the Regulation 19 SA Report concerning Areas of Informal Recreation. December 2024. Available at: https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_067d8ab1f5a745b5bb415c988535a25b.pdf [Date accessed: 07/04/26]

3.7 Renewable energy sites

- 3.7.1 The SWCs identified 12 reasonable alternative locations for the development of renewable energy sites, which were appraised in the Regulation 19 SA (Appendix I)³⁴.
- 3.7.2 The SA identified major positive effects for all sites, owing to the proposed development of solar farms at each site which would contribute towards renewable energy generation (and consequently reduced reliance on energy from fossil fuels) within South Worcestershire. Potential negative effects were identified for most sites in relation to biodiversity, landscape and cultural heritage, whereby solar farms could alter the character of the local area including nearby heritage assets and may lead to adverse impacts on biodiversity in the short term such as degradation of priority habitats.
- 3.7.3 Nine renewable energy sites have been allocated through Policy SWDPR 67 (Renewable and Low Carbon Energy Site Allocations), which were considered to meet the essential site suitability criteria identified by the SWCs and in accordance with the findings of the SA.

3.8 Overall conclusions on reasonable alternatives

- 3.8.1 The SA process has demonstrated that the adopted SWDPR represents a balanced and justified approach to accommodating growth in South Worcestershire when considered against the range of reasonable alternatives.
- 3.8.2 The appraisal of spatial strategy options identified that no single approach performed strongly across all sustainability objectives. The preferred strategy therefore draws on the strengths of multiple options, combining elements of rail-focused development, urban intensification and sustainable urban extensions. This integrated approach enables the Plan to maximise accessibility and infrastructure efficiency, whilst responding to environmental constraints and the character of the area.
- 3.8.3 Similarly, the assessment of strategic and non-strategic sites has shown that all reasonable alternatives are associated with a mixture of positive and adverse effects. The selection of allocations has been informed not only by SA findings, but also by the wider evidence base, including landscape sensitivity, infrastructure capacity, deliverability and policy considerations. The SA has provided a consistent basis for comparing options and identifying where mitigation is required.
- 3.8.4 Overall, the adopted SWDPR reflects a reasoned and transparent response to the SA of reasonable alternatives. While some residual adverse effects are unavoidable, particularly in relation to climate change, air quality and the loss of undeveloped land, the Plan incorporates a range of policy measures to avoid, minimise and mitigate these effects. In this context, the SA demonstrates that the chosen strategy is appropriate and proportionate, and that reasonable alternatives have been properly considered in accordance with the SEA Regulations.

³⁴ Lepus Consulting (2022) Sustainability Appraisal of the SWDPR 2021-2041: Publication Version. Regulation 19 SA Report. Volume 1, 2 and 3. September 2022. Available at: https://www.localplanservices.co.uk/files/ugd/017f5b_19e30f5f40f54a6990cbff70df85c923.pdf [Date accessed: 07/04/26]

4 How the Environmental Report has been taken into account

4.1 SA findings

- 4.1.1 The SA, incorporating SEA, has played a central role in shaping the SWDPR throughout its preparation. The process has not been a standalone exercise; rather, it has informed key decisions relating to spatial strategy, site selection, policy development and mitigation.
- 4.1.2 At each stage of plan-making, the SA has provided a consistent and proportionate framework for testing the likely environmental, social and economic effects of emerging options. This has enabled the Councils to identify where adverse effects may arise, consider reasonable alternatives, and refine the Plan to improve overall sustainability performance.
- 4.1.3 The influence of the SA is evident in several aspects of the adopted SWDPR. In particular, the appraisal has:
- informed the evolution of the spatial strategy, including the balance between strategic growth locations and the distribution of development across the settlement hierarchy;
 - supported the comparative assessment and selection of strategic and non-strategic site allocations;
 - contributed to the strengthening of policy wording, particularly in relation to green infrastructure, biodiversity net gain, climate change, and environmental protection; and
 - highlighted the need for mitigation and monitoring measures to address residual adverse effects, including those relating to air quality, climate change and the use of natural resources.
- 4.1.4 The SA findings presented below should therefore be understood as part of an iterative process which has influenced the final form of the SWDPR, rather than a retrospective assessment of a fixed plan.
- 4.1.5 The SA of the SWDPR, in particular the Regulation 19 SA Report (SEA Environmental Report)³⁵, identified residual positive and negative effects associated with several SEA topics. This chapter discusses the significance of the residual effects and reviews the extent to which the SWDPR has responded to the findings.
- 4.1.6 A range of positive impacts on sustainability were identified as a result of the SWDPR, which are highlighted throughout the policy and site assessments in Appendices G and K of the Regulation 19 SA Report, and are summarised in **Table 4.1**.

³⁵ Lepus Consulting (2024) Sustainability Appraisal of the SWDPR: Addendum to the Regulation 19 SA Report concerning Areas of Informal Recreation. December 2024. Available at: https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_067d8ab1f5a745b5bb415c988535a25b.pdf [Date accessed: 07/04/26]

Table 4.1: Likely residual positive effects of the SWDPR recorded in the Regulation 19 SA (2022)

Residual positive effects	
1	Housing provision The proposed development of c.25,000 dwellings across South Worcestershire would be expected to make a significant and positive contribution towards meeting the identified local housing need. SWDPR planning policies would be expected to ensure that residential-led developments meet the needs of the local community, including provision of affordable and specialist housing.
2	Employment opportunities The proposed development of c.300ha of new employment land through development allocations in the SWDPR would be expected to make a significant and positive contribution to the employment needs of new and future residents and to the local economy.
3	Multi-functional green infrastructure network The SWDPR aims to ensure that development proposals incorporate green links, increase the provision of the multi-functional green infrastructure (GI) network and deliver biodiversity net gain. Although the proposed development would be expected to result in the loss of greenfield land and associated GI to some extent, SWDPR policies would be expected to help ensure that there are improvements to, and the increased provision of, the multi-functional GI networks across the Plan area.
4	Promoting good physical and mental health and wellbeing The SWDPR seeks to provide a range of open green spaces, GI and recreational assets (including AIRs) which would be expected to help facilitate healthy and active lifestyles for new and future residents. This would be expected to increase residents' access to outdoor space for physical exercise, as well as access to natural habitats, which are known to have mental health and wellbeing benefits.
5	Community cohesion The site allocations and policies within the SWDPR would be likely to support community cohesion through a wide range of approaches including meeting housing need, providing a suitable housing mix, affordable housing, provision of and sustainable access to employment opportunities, supporting sustainable transport (particularly active travel), access to and provision of new community buildings and schools, access to and provision of different types of publicly accessible greenspace and sports facilities to meet local needs. This would be expected to help facilitate vibrant and interactive communities, and lead to a greater sense of place within settlements.

4.1.7 The mitigation proposals presented in the SWDPR provide positive planning mechanisms for delivering sustainable development where the Plan is able to reasonably address the issue. It is recognised that the Plan cannot fully address the sustainability effects of national and international trends, such as increased frequency of storm events associated with climate change.

4.1.8 **Table 4.2** sets out the adverse residual effects identified in the Regulation 19 SA. These effects are generally minor, although some, particularly those relating to air quality and climate change, are subject to greater uncertainty and may be of a larger magnitude. Such effects require ongoing attention beyond the SWDPR and are reflected in the monitoring recommendations in **Chapter 6**. While the Plan incorporates mitigation measures, it cannot fully address these issues, which are expected to occur with or without the Plan. As a result, some residual adverse effects are still likely, particularly when considered cumulatively.

Table 4.2: Likely residual adverse effects of the SWDPR recorded in the Regulation 19 SA (2022)

Residual adverse effects	
1	Reduction in air quality Due to the volume of development proposed, an increase in traffic flows and subsequent reduction of air quality would be expected to have residual adverse effects on human health. In addition, many new residents could potentially be located within 200m of a main road. Cumulatively, this would be expected to result in a reduction of local air quality.
	Increased pollutant emissions, including greenhouse gases An increase in pollutants including greenhouse gases would be expected following the development proposed within the SWDPR. The introduction of c.25,000 new dwellings would be expected to increase the local population by a significant amount, resulting in higher traffic volumes and energy demand, which would be expected to result in an increase of pollutant emissions.
3	Fragmentation of the ecological network The SWDPR would be expected to result in the loss of a significant amount of previously undeveloped land. This loss of land would be expected to include habitats and ecological links between designated biodiversity assets ultimately affecting the integrity of the wider ecological network.
4	Increased risk of urbanisation of the open countryside and coalescence A large proportion of allocated sites within the SWDPR are located on previously undeveloped land in the open countryside of South Worcestershire. The proposed development in these locations would be expected to increase the risk of urbanisation of the countryside and coalescence.
5	Loss of tranquillity The proposed development of c.25,000 dwellings across South Worcestershire, with a number of developments located within rural areas of Wychavon and Malvern Hills Districts, would be likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.
6	Increased household waste generation The introduction of c.25,000 new households as proposed within the SWDPR would be expected to increase household waste generation within the Plan area to some extent. Although SWDPR policies seeks to support sustainable waste management and encourage behavioural change including promoting recycling, there is little scope to reduce the quantity of waste generated per household.
7	Loss of soil resources, including BMV land Over c.900ha of development allocated within the SWDPR is located on previously undeveloped land. This would be expected to result in the permanent and irreversible loss of ecologically, and potentially agriculturally, important soil resources, putting pressure on the ecosystem services. Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, filtering air, carbon storage and providing the basis for vegetation to flourish.
8	Impacts on the Cotswolds National Landscape and Malvern Hills National Landscape Although several SWDPR policies seek to ensure that development within the Cotswolds or Malvern Hills National Landscapes or their settings conserve and enhance the natural beauty of the landscape and its special qualities, it is unlikely that these impacts could be fully mitigated where allocated sites are located in areas identified as being of 'high' landscape sensitivity and/or have no capacity for development as identified in the Landscape and Visual Sensitivity Studies, as these areas are "unable to accommodate the relevant type of development without significant character change or adverse effects".

Residual adverse effects	
9	Alteration of landscape character Due to the large scale of development proposed within the SWDPR, it is expected that new built form in some areas may conflict with distinctive local character of existing landscapes and townscape, resulting in adverse impacts on the local landscape character. Although various SWDPR policies seek to ensure that development is designed to take into account the Landscape Character Assessment information and new buildings are integrated with the local context, it is expected that in some cases development will adversely impact, or potentially result in the loss of, landscape features or open countryside views.
10	Increased demand for water and wastewater management The introduction of a significant number of new residents would be expected to result in increased pressure on local water resources, such as increased demand for drinking water supply and wastewater treatment. A Water Cycle Study has been prepared, which recommends early and continued engagement with Severn Trent Water in order to ensure that where upgrades to water supply or wastewater infrastructure is required, it can be planned in to ensure that it is in place prior to occupation of development sites. In line with the precautionary principle, it is considered that the proposed development within the SWDPR could result in a residual adverse impact on water resources.

4.2 SA recommendations

- 4.2.1 Throughout the SA process, recommendations have been made to strengthen the SWDPR. As a result, the sustainability performance of the plan has been improved through the ongoing refinement of policies, supporting a process of continual improvement and helping to minimise identified adverse effects.
- 4.2.2 Recommendations were provided at each stage of the SA, with draft outputs shared with the SWCs during plan preparation. The most significant opportunities to influence SWDPR policies arose during the Regulation 18 (II) and (III) stages.
- 4.2.3 Recommendations generated throughout the SA process were fed back to the SWCs to inform decision-making as the SWDPR evolved. These are summarised in **Table 4.3** for each SEA topic, drawing on the Regulation 18 (II) and (III) SA reports. The recommendations identify measures to mitigate potential adverse effects highlighted during the SA. In many instances, suggested policy enhancements were incorporated into the final SWDPR policies by the SWCs, as reflected in the right-hand column of the table.

Table 4.3: Summary of key recommendations made during the SA process and SWC response

SA/SEA theme	Regulation 18 (II)	Regulation 18 (III)	Incorporation into the SWDPR
Air	- In line with the NPPF, development should seek to, wherever possible, help to improve environmental conditions, including air quality. This target should be incorporated into the development of policies. - Proposed improvements to the green infrastructure network provides the opportunity to naturally filter pollutants from the air. This would be likely to improve the quality of the environment in South Worcestershire. It is recommended that this vision be embedded into the policies and that a strategy for its implementation be developed in more detail.	Policy should reflect recommendations within the Air Quality Action Plan and the outputs of the Progress Reports.	- The SA recommendations relating to air quality informed the inclusion and refinement of Policy SWDPR 41 (Air Quality), which requires development to avoid significant impacts on air quality and to assess and mitigate effects where necessary, particularly supported by mandatory Air Quality Assessments. - In addition, the SA emphasis on preventative and strategic measures is reflected in Policy SWDPR 07 (Green Infrastructure), which requires the provision, protection and enhancement of GI networks which deliver multiple environmental benefits including pollution reduction and improvements to air quality. - Further, SWDPR 11 (Health and Wellbeing) – criterion B vii requires buildings to be planned to minimise (users/occupants) exposure to air pollution, with Health Impact Assessments required for certain proposals under criterion C.
Biodiversity, flora and fauna	- It is recommended that the findings and recommendations of the future SWDPR HRA be incorporated into final policies. - It is recommended that policies and site-specific masterplans seek to safeguard Sites of Special Scientific Interest (SSSIs) within the Plan area.	- Promote development which aims to provide supporting habitat to SACs, SPAs and Ramsar sites. - Improve the resilience of the ecological network through increased quantity of	The SA recommendations were considered through the strengthening of biodiversity-related policies within the SWDPR. Policies SWDPR 29 and SWDPR 30 require development to deliver measurable biodiversity net gain, support conservation and restoration

SA/SEA theme	Regulation 18 (II)	Regulation 18 (III)	Incorporation into the SWDPR
	This will ensure compliance with the NPPF which states that development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The output of the HRA would help to shape policies.	habitat and enhanced habitat connectivity through landscape scale management. • Ensure a high quality and comprehensive ecological network map is prepared and used to inform policy. • Retain individual trees, groups of trees, hedges and woodland. Ensure the provision of trees where appropriate. • It is recommended that a Tree and Woodland Strategy is prepared, or an update is prepared for the existing 'Trees and Woodland in Worcestershire: Biodiversity and Landscape Guidelines for their Planting and Management'. • Ensure policy recognises the wider benefits of natural capital and ecosystem services.	of priority habitats and species, and enhance ecological networks. SWDPR 29 also sets out the requirements of, and rationale for, Urban Biodiversity Corridors. The role of the HRA in shaping policy has been reflected through safeguards for designated sites and their settings, while Policy SWDPR 07 (Green Infrastructure) further supports landscape-scale ecological connectivity through the protection and enhancement of GI networks. Detailed mitigation and site-specific design responses are intended to be addressed through project-level assessment.
Climatic factors	• In order to further improve the sustainability and reduce the carbon footprint of South Worcestershire, the policies could include greater encouragement for development proposals to achieve greater than 15% of energy from renewable/low carbon sources.	• Consider setting higher standards than required by the Building Regulations for residential-led developments such as the former Code for Sustainable Homes Level 4. • Development proposals should aim to be low carbon. • Consider retrofitting buildings to make them more energy efficient. • Evidence the carbon capture and storage properties of the Plan area. • Consider local partnerships to establish locally appropriate solutions to the climate crisis.	• The SA identified opportunities to strengthen climate change mitigation and adaptation within the Plan. These recommendations informed the preparation of Policy SWDPR 01 (Climate Change Mitigation and Adaptation), which promotes and supports low-carbon development, energy efficiency, renewable and low-carbon energy generation, and resilience to climate impacts. Policy SWDPR 07 (Green Infrastructure) also contributes through green and blue infrastructure, including carbon sequestration and ecosystem services.

SA/SEA theme	Regulation 18 (II)	Regulation 18 (III)	Incorporation into the SWDPR
		- Understand what role the Local Plan can play in monitoring the plan areas' carbon footprint. - Understand and help set carbon budgets for land use activities determined through the development control process via appropriate policy development. - It is recommended that the Worcestershire Green Infrastructure Strategy is regularly updated to continue to inform the provision of green and blue infrastructure alongside development throughout the Plan period. - Design policy to help ensure that agriculture-related development proposals take into consideration the latest guidance on climate and farming, for example, 'Climate Smart Agriculture: Mapping guidance on climate change' and 'Land use: Reducing emissions and preparing for climate change'.	- Additionally, SWDPR 05 (Design and Sustainable Construction) sets out policy to mitigate the impacts of climate change through sustainable approaches to design and construction and SWDPR 37 (Renewable and Low Carbon Energy) requires all new developments over 100 sq. m gross or one or more dwellings to incorporate the generation of energy from renewable or low carbon sources equivalent to at least 20% of predicted total energy requirements. - While the SWDPR does not mandate standards exceeding national requirements, due to viability, deliverability, and regulatory considerations, it establishes a framework to support improved performance where feasible.
Cultural heritage	Draft Policy 'Management of the Historic Environment' should be enhanced to require any development proposal which could result in a significant impact on a heritage asset to prepare a Heritage Statement, proportionate to the significance of the asset. This would provide a site-specific assessment of the impact of a proposal on the heritage asset and thereby help to conserve or enhance the local historic environment.	- Development proposals which have the potential to harm the significance of a heritage asset should be subject to a site-specific Heritage Statement. - Policy and design codes should ensure development proposals adhere to the recommendations within the Historic Landscape Characterisation Report. - Ensure the SWDPR takes a positive approach to the conservation, enjoyment and understanding of the historic environment.	SA recommendations regarding the conservation and management of the historic environment were taken into account through the refinement of heritage policies. Policies SWDPR 09 (Historic Environment) and SWDPR 33 (Management of the Historic Environment) require development proposals affecting heritage assets or their conserve and enhance heritage assets and require proposals to include a Heritage Statement where appropriate.

SA/SEA theme	Regulation 18 (II)	Regulation 18 (III)	Incorporation into the SWDPR
	It is recommended that there is greater emphasis in the accompanying wording in the Plan regarding the irreplaceable nature of the historic environment.		The policies reflect the irreplaceable nature of heritage assets and require proposals to respond to relevant evidence.
Human health	The final policies should reference masterplan information regarding the provision of new health and leisure facilities and/or improved accessibility to existing facilities, especially in more rural areas that are located a significant distance from a hospital.	- Ensure the retention of existing, and increased provision / capacity of, General Practitioner (GP) surgeries and leisure centres across the Plan area. - Use policy to help ensure that development proposals take into consideration the findings of the reports within the South Worcestershire Sports Facilities Framework, along with other relevant documents within the Evidence Base. It is recommended that these documents are updated. - Policy or design codes for new development proposals should encourage applicants to take into consideration the findings of the Rights of Way Improvement Plan. It is recommended that an update to this plan is prepared alongside the Local Transport Plan 4. - Policy requirements should ensure development proposals take into consideration the findings of the Worcestershire GI Framework 3: Access and Recreation.	- The SA recommendations relating to health, wellbeing and access to facilities informed the inclusion of policies that support healthy communities. Policy SWDPR 11 (Health and Wellbeing) promotes development that supports physical and mental wellbeing through access to services, open space and active travel. SWDPR 11 also requires Health Impact Assessments to be carried out for certain proposals under criterion C. - Policies SWDPR 07 (Green Infrastructure), SWDPR 32 (Areas of Informal Recreation), and SWDPR 48 (Open Space) support recreational opportunities and access to green space. - Additionally, SWDPR 35 (Amenity) sets out policy requirements for proposals which may impact on human health in relation to noise, lighting and odour and effluvia. - While the delivery of specific health facilities lies outside the direct control of the Plan, the policy framework enables mitigation and provision to be secured where required including through developer contributions.

SA/SEA theme	Regulation 18 (II)	Regulation 18 (III)	Incorporation into the SWDPR
Landscape	There is no specific policy wording that relates to the protection of Country Parks or their setting. It is recommended that reference to Country Parks is implemented into the SWDPR policies, as some of the reasonable alternative sites are located in areas where adverse impacts on Country Parks could potentially occur.	Ensure development proposals aim to protect and enhance the special qualities of country parks (and AIRs).	- The SA recommendations relating to landscape protection and recreational landscapes were taken into account through a combination of strategic and development management policies. - Policies SWDPR 07, SWDPR 32 and SWDPR 48 support the protection and enhancement of landscape character, open countryside and recreational assets. Effects on sensitive landscapes, including National Landscapes and their settings, are managed through policy safeguards in SWDPR 31 (The Cotswolds National Landscape and Malvern Hills National Landscape) and reference to supporting landscape evidence, with detailed assessment undertaken at application stage.
Population and material assets	- There is no specific policy or policy wording that relates to the provision of new primary or secondary schools, or the expansion of existing schools, following a needs assessment. It is recommended that this is implemented into the SWDPR, as many of the reasonable alternative sites assessed in this SA Report are located outside of a sustainable distance to a primary school (800m) and/or secondary school (1500m). - It is recommended that the SWCs take a proactive, positive and collaborative approach to assessing the educational needs of the local population to ensure that all new residents are	- Use policy to ensure all development proposals are built to a high-quality design in line with the 'Design: process and tools' government guidance. - Where appropriate, the SWDPR should provide policy support for community ownership of facilities and services. - Increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need. - Development proposals which would exceed the identified employment need for the Plan area should ensure the proposal	The SA identified issues relating to education provision, transport accessibility, waste management and economic growth. These recommendations informed a range of policies addressing infrastructure, design quality and accessibility. Policy SWDPR 10 provides the mechanism for securing social infrastructure, including education provision, where required. Policies SWDPR 28 (Design) and SWDPR 07 (Green Infrastructure) support sustainable design, accessibility and active travel. Some matters, such as waste reduction and public transport service delivery, are influenced by

SA/SEA theme	Regulation 18 (II)	Regulation 18 (III)	Incorporation into the SWDPR
	located within a sustainable distance to a range of educational facilities. • Opportunities should be explored in the policies to achieve smart economic growth. This could be encouraged through the use of technology and innovative ways of working to increase productivity without damaging people's quality of life or the environment. • There is no specific policy or policy wording with regard to the provision of new bus stops or improvements to the bus services to increase access to public transport for new residents. It is recommended that this is considered and implemented into the SWDPR. • It is recommended that policies within the SWDPR make direct reference to policies set out in the Worcestershire Local Transport Plan, such as the Strategic Transport Schemes for South Worcestershire and the Droitwich, Vale of Evesham, Malvern and Tenbury Wells, Pershore and Worcester 'Packages'. • Although the SWDPR sets out aims to help to encourage appropriate waste disposal and recycling, it is considered unlikely that the SWDPR alone can reduce the quantity of waste generated per household. It is recommended that the SWDPR includes a requirement of the construction of new development to use recycled material where possible, and that any waste material during construction is recycled to help reduce overall waste generation in the Plan area.	should assess the potential need for increase in residential development or other infrastructure. • Policy and design codes should ensure development proposals consider the recommendations of the National Cycling Strategy. • Policy and design codes should ensure development proposals take into consideration the access of Heavy Goods Vehicles and emergency vehicles. • Policies should aim to ensure that development proposals demonstrate measures to minimise waste generation during construction. • Policy requirements and potentially design codes should be used to integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting. • Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with 'Net Zero, The UK's contribution to stopping global warming'.	wider strategies and delivery partners; however, the SWDPR provides a policy framework to support collaborative delivery.

SA/SEA theme	Regulation 18 (II)	Regulation 18 (III)	Incorporation into the SWDPR
Soil	- The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion. - Consider the requirement for Construction Environmental Management Plans and Planning Conditions. - Where sites contain bare soil following construction of development, it is recommended that vegetation, in particular native plant species, be used to cover the ground. - Where appropriate, site-specific Agricultural Land Classification (ALC) studies should be encouraged. - To protect the soil resource, where possible provide open space or green infrastructure, such as community orchards and allotments, in areas of BMV land within a site boundary.	It is recommended that a site-specific ALC study is carried out for all development proposals to determine whether the proposed development would result in the loss of some of the Plan area's BMV soil.	SA recommendations relating to soil protection and the loss of BMV agricultural land were taken into account through policies promoting sustainable site design and GI, including SWDPR 16. Policies SWDPR 07 and SWDPR 28 support tree retention, landscaping, permeable surfaces and multifunctional green space, contributing to soil stability and land quality. While mandatory site-specific agricultural land classification studies are not required in all cases, soil considerations can be addressed through layout, land use and mitigation at the project level.
Water	- It is noted that a number of reasonable alternative sites include land located within Flood Zone 3. It is recommended that masterplans for these development proposals specifically incorporate the requirements of draft Policy 'Management of Flood Risk'. - In line with the NPPF, development should seek to, wherever possible, help to improve environmental conditions, such as air and water quality. This target should be incorporated into the development of policies. - It is noted that draft Policy 'Sustainable Drainage Systems' refers to groundwater in the context of improving recharge. This policy could potentially	- Use policy to help ensure development proposals take into account the recommendations of the Sustainable Drainage Systems non-statutory technical standards for sustainable drainage systems - Policies should recognise the most recent Water Cycle Study and other relevant documents within the Evidence Base, including Water Resource Management Plans, Catchment Flood Management Plan and Basin Management Plans.	The SA recommendations regarding flood risk, water quality and sustainable drainage informed the preparation of Policies SWDPR 38, SWDPR 39 and SWDPR 40. These policies require development proposals to avoid inappropriate locations at high flood risk, incorporate Sustainable Drainage Systems, protect groundwater and water quality, have regard to the Water Cycle Study and other relevant water-related evidence and manage water supply, water usage, water drainage and foul treatment. The SWDPR therefore reflects a precautionary approach to water management, while recognising that detailed

SA/SEA theme	Regulation 18 (II)	Regulation 18 (III)	Incorporation into the SWDPR
	be strengthened through specific wording relating to protecting the quality of groundwater Source Protection Zones. It is recommended that the findings and recommendations of the SWDPR HRA be incorporated into final policies.		solutions are secured through site-specific design and engagement with infrastructure providers.

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

5.1 Consultation responses

- 5.1.1 As set out in **Table 2.1**, the SWDPR has been prepared across a number of iterative stages, accompanied by various SA outputs. At each stage, an SA report was published for consultation with both the statutory bodies (Natural England, Historic England and the Environment Agency) and the public, alongside SWDPR documents where relevant.
- 5.1.2 The following SA reports have been subject to consultation for the SWDPR:
- SA Scoping Report (June – August 2018);
 - Regulation 18 Issues and Options SA (November – December 2018);
 - Regulation 18 (II) SA (November – December 2019);
 - Regulation 18 (III) SA (March – April 2021);
 - Regulation 19 SA (November – December 2022); and
 - Main Modifications SA (January – February 2026).
- 5.1.3 A summary of the key responses received at each of the consultation stages relating to the SA, including those received from the statutory bodies, are summarised in **sections 5.2 to 5.6**.
- 5.1.4 All consultation responses to the SWDPR and the accompanying evidence base, including comments from the statutory consultees on the Plan itself, can be found on the SWDPR website³⁶.

5.2 SA Scoping Report comments

- 5.2.1 Between June and August 2018, the content of the Scoping Report was consulted with the statutory bodies Historic England, Natural England and the Environment Agency. **Table 5.1** summarises the key comments received, and actions taken.

Table 5.1: Consultation on the SA Scoping Report (2018)

Consultee	Summary of comments received	Incorporation into the SA
Environment Agency	Requested stronger reference to the sequential approach to flood risk, Flood Zone 1, surface water flooding, Strategic Flood Risk Assessment (SFRA) updates, water quality, sustainable drainage systems, and water resource / wastewater evidence.	Flood risk and climate resilience were addressed within SA Objective 2 and Chapter 15 (Water) of the Regulation 19 SA. Sequential testing and flood risk considerations were reflected through the appraisal and relevant SWDPR policies. Water matters, including fluvial and surface water flood risk, were incorporated into the SA framework and assessment.
Historic England	Requested clearer reference to the setting of heritage assets, conservation area character, and non-designated heritage assets, and	SA Objective 9 was updated to refer to heritage assets and their setting, and non-designated assets were included in the

³⁶ South Worcestershire Development Plan Review. Available at: <https://www.swdevelopmentplan.org/> [Date accessed: 07/04/26]

Consultee	Summary of comments received	Incorporation into the SA
	recommended engagement with heritage specialists.	assessment methodology. A Historic Environment Topic Paper was also prepared to support policy development and site assessment.
Natural England	Sought stronger emphasis on habitat protection, restoration and enhancement, water quality, ecological connectivity, National Landscape management plan aims, BMV agricultural land, and biodiversity net gain.	These matters were incorporated into the SA Framework, particularly SA Objective 3, which includes habitat protection and enhancement, connectivity, water quality, and biodiversity net gain. Relevant key issues text was updated in the Regulation 19 SA.

5.3 Regulation 18 Issues and Options SA comments

5.3.1 The Issues and Options SA Report was published for public consultation alongside the SWDPR Issues and Options document between November and December 2018. **Table 5.2** provides a summary of some key responses raised and how these were considered in the SA process going forward.

Table 5.2: Consultation on the Issues and Options SA (2018)

Consultee	Summary of comments received	Incorporation into the SA
Environment Agency	Requested that spatial options and site selection be informed by an updated SFRA and Water Cycle Study, with stronger emphasis on sequential testing, climate change allowances, flood risk from all sources, water resources, wastewater capacity, Source Protection Zones and water efficiency.	These matters informed subsequent evidence base work and the appraisal of spatial options and site allocations, including flood risk, climate resilience and water environment considerations within the SA.
Historic England	Suggested that the SA should better recognise the contribution of the historic environment, including links between heritage, place and environmental quality.	Heritage considerations were taken forward in subsequent iterations of the SA and in supporting evidence relating to the historic environment.
Natural England	No comments received on the SA.	N/A
Worcestershire County Council	Supported stronger integration of GI and masterplanning principles, including use of design codes and strategic GI planning for larger sites.	These comments informed later consideration of GI, placemaking and site design within the SA and the SWCs' policy development process.
Various – Climate change / transport / air quality	Comments highlighted the need to avoid over-reliance on private car use or electric vehicles alone, and to prioritise active travel, public transport and lower-emission patterns of development.	These matters were reflected in later appraisal of site options and policies, with continued emphasis on accessibility, sustainable transport and climate change mitigation.
Various – Spatial strategy and distribution of growth	Many representations commented on the relative merits of Options A-D, including support for rail-focused growth, dispersal, continuation of the existing strategy, or combinations of options. A recurring theme was the need for a flexible strategy	These representations informed the appraisal of reasonable alternatives and helped refine the preferred spatial strategy through subsequent stages of plan preparation.

Consultee	Summary of comments received	Incorporation into the SA
	capable of delivering housing in sustainable locations.	
Various – Housing evidence and reasonable alternatives	Some respondents requested use of updated housing evidence and suggested that combinations of options should be tested through the SA as reasonable alternatives.	These comments were taken into account in subsequent iterations of the SA and plan evidence base, including further consideration of alternatives and updated evidence.

5.4 Regulation 18 (II) SA comments

5.4.1 The Regulation 18 (II) SA Report was published for public consultation alongside the SWDPR Preferred Options consultation document between November and December 2019. **Table 5.3** provides a summary of some key responses raised and how these were considered in the SA process going forward.

Table 5.3: Consultation on the Regulation 18 (II) SA (2019)

Consultee	Summary of comments received	Incorporation into the SA
Environment Agency	No comments received on the SA.	N/A
Historic England	Raised concerns about how heritage considerations were presented and evidenced, including mapping inconsistencies, absence of the Heritage Topic Paper at that stage, and lack of clear site-specific explanation in the SA showing how historic environment impacts informed site selection.	A Historic Environment Topic Paper was subsequently prepared by the SWCs. Heritage impacts were considered through the SA and the wider site assessment process, including SWC engagement with heritage and archaeological officers. Reasonable alternatives were appraised against historic environment data as part of the evidence informing decisions.
Natural England	No comments received on the SA.	N/A
Various – Spatial strategy / distribution of growth	Concerns were raised that the Preferred Options spatial strategy over-relies on new settlements, does not sufficiently test alternatives, and may conflict with environmental objectives.	The Regulation 18 (III) SA evaluated updated strategic locations and other reasonable alternative sites. This ensured that a range of options were assessed at a strategic level, to inform the Regulation 19 version of the SWDPR and remain compliant with the SEA Regulations.
Various – Site-specific comments	Specific sites were highlighted where respondents felt the SA was incomplete, scored incorrectly, or did not adequately reflect environmental constraints, biodiversity impacts, or deliverability.	The Regulation 18 (III) SA evaluated the latest suite of reasonable alternative sites identified by the SWCs, including strategic locations, to inform the Regulation 19 stage. The SA methodology remains a high-level, plan-wide assessment, with inherent limitations, but is consistent and compliant with the SEA Regulations.
Various – Compliance with SEA /	Some respondents expressed concern that certain sites were included without full SEA	The Regulation 18 (III) SA was prepared as an additional consultation stage to ensure all reasonable alternatives were evaluated. This

Consultee	Summary of comments received	Incorporation into the SA
legal requirements	assessment, potentially contradicting environmental assessment regulations.	process, along with the Regulation 19 SA, ensures full compliance with the SEA Regulations.
Various – Housing targets and impact	Comments suggested that the SA should reconsider housing targets, particularly for rural areas, to prevent overdevelopment and ensure impacts on services, schools, and infrastructure are adequately assessed.	The SA considered housing targets at a strategic, plan-level and highlighted potential impacts on services and infrastructure. Detailed site-level impacts, including capacity of schools and other services, are addressed through policies and planning controls.

5.5 Regulation 18 (III) SA comments

5.5.1 The Regulation 18 (III) SA Report was published for public consultation between March and April 2021. **Table 5.4** provides a summary of some key responses raised and how these were considered in the SA process going forward.

Table 5.4: Consultation on the Regulation 18 (III) SA (2021)

Consultee	Summary of comments received	Incorporation into the SA
Environment Agency	No comments received on the SA.	N/A
Historic England	Requested clearer and more robust treatment of the historic environment in the SA, including stronger site-specific assessment, clearer use of heritage evidence, and better explanation of how heritage impacts and mitigation informed policy and site appraisal.	Chapter 10 of the Regulation 19 SA addressed cultural heritage effects, and the SWCs prepared a Historic Environment Topic Paper to support policy development and site allocations. Historic Landscape Characterisation and other heritage evidence informed the assessment, with further clarification provided on site-level effects and mitigation in the Regulation 19 SA.
Natural England	Supported the overall SA approach to biodiversity and ecological networks, but sought stronger consideration of National Landscape setting, site-specific ecological sensitivities, and the relationship between GI, recreation and biodiversity impacts.	Landscape and visual sensitivity, including effects on National Landscape settings, were taken into account in the assessment of reasonable alternatives using relevant evidence base studies. Site effects were considered at a strategic level within the SA, with further detail provided in Appendix G and Chapter 12 (Landscape) of the Regulation 19 SA.
Worcestershire County Council	Sought stronger integration of GI, health and recreation considerations, including links between GI, wellbeing and ecological resilience.	These issues informed subsequent consideration of GI, placemaking, accessibility and environmental quality within the SA and policy development process.
Various – Flood risk and water environment	A recurring concern was whether growth options and allocations were sufficiently informed by flood risk, drainage, water supply and wastewater infrastructure constraints.	These matters informed later evidence base updates and site appraisal work, including consideration of mitigation and infrastructure requirements.

Consultee	Summary of comments received	Incorporation into the SA
Various – Landscape / settlement character	Comments highlighted potential effects on landscape sensitivity, National Landscape setting, views, and the character of settlements and the countryside.	These matters were considered through the SA and supporting landscape evidence, including comparative appraisal of site and strategy options.
Various – Biodiversity / ecological constraints	Representations raised concern about impacts on designated sites, ecological networks, functionally linked land, and the adequacy of ecological evidence for some allocations.	These issues informed the environmental assessment of site options and subsequent refinement of SA conclusions where appropriate.
Various – Spatial strategy and distribution of growth	Many comments addressed whether the preferred spatial strategy represented the most sustainable option, including debate around strategic growth locations, urban intensification, villages, and accessibility.	These comments informed refinement of the preferred strategy and the appraisal of reasonable alternatives through later plan-making stages.
Various – Transport / accessibility / climate change	Responses emphasised the need to reduce car dependency, support active travel and public transport, and align the strategy more clearly with climate objectives.	These matters were reflected in subsequent appraisal of accessibility, emissions, transport effects and the sustainability of site allocations.
Various – Infrastructure / deliverability / viability	Some comments questioned whether proposed allocations and strategy choices were supported by adequate infrastructure, mitigation and realistic delivery assumptions.	These issues were considered through the wider evidence base, site assessment and policy refinement process.
Various – Design / placemaking / healthy communities	Comments sought stronger emphasis on design quality, local distinctiveness, health, liveability and the relationship between development and place quality.	These matters informed subsequent policy drafting and SA consideration of social and environmental effects.

5.6 Regulation 19 SA comments

- 5.6.1 The Regulation 19 SA Report was published for public consultation alongside the Regulation 19 Publication version of the SWDPR between November and December 2022. **Table 5.5** provides a summary of some key responses raised and how these were considered in the SA process going forward.

Table 5.5: Consultation on the Regulation 19 SA (2022)

Consultee	Summary / extract of comments received	Incorporation into the SA
Environment Agency	No comments received on the SA.	N/A
Historic England	No comments received on the SA.	N/A
Natural England	Recommended the SA is updated to take into account the new evidence regarding recreational pressures on the Malvern Hills Site of Special Scientific Interest (SSSI).	These comments were addressed by the SWCs through updates to Policy SWDPR 07 in the Main Modifications, which included measures for developer contributions toward the SSSI mitigation strategy. The Main Modifications SA evaluated these policy

Consultee	Summary / extract of comments received	Incorporation into the SA
		changes, ensuring that potential recreational impacts were considered.
Various – Methodology and assumptions	Several respondents suggested that the SA contained errors in assumptions or methodology. Concerns were raised about the use of numerical scoring and ranking of strategic locations, with some arguing that differences between sites (e.g., Mitton vs Throckmorton) were not consistently or transparently applied.	The SA was prepared using a consistent, high-level methodology in line with the SEA Regulations. While some respondents questioned scoring and site comparisons, these issues were considered and discussed during the examination hearings. The approach taken remains appropriate for a strategic plan-level assessment.
Various – Reliance on secondary data	Respondents noted that the SA primarily relied on secondary sources and suggested this limited the accuracy of site-specific assessments.	The SA relied primarily on secondary sources to inform a plan-wide appraisal. Comments regarding data limitations were noted and considered during examination, but the strategic, high-level approach was confirmed as suitable.
Various – Site-specific comments	Several respondents focused on how the SA assessed individual sites or objectives. This included challenges to how particular SA Objectives were applied, questioning whether the scoring accurately reflected sustainability impacts, and concerns that certain assumptions (such as delivery of supporting infrastructure prior to development) were unjustified.	Responses regarding the assessment of individual sites or specific SA Objectives were reviewed during the examination hearings. The SA is a strategic, plan-level tool and does not provide detailed project-level assessment; the methodology and assumptions were considered appropriate for the level of appraisal required.
Various – Appraisal of strategy options	Some respondents raised concerns about how the SA assessed spatial distribution options for development. This included whether alternative patterns of growth (e.g. more dispersed versus concentrated development) had been fully considered, and whether the appraisal adequately reflected their relative environmental, social and economic impacts.	Comments on spatial distribution options and the relative sustainability of alternative patterns of growth were considered during the examination process. The SA provided a strategic-level evaluation of reasonable alternatives and options, which the SWCs and Inspectors concluded was proportionate and consistent with regulatory requirements.

5.7 Main Modifications SA comments

- 5.7.1 In September 2023, the SWDPR was submitted for Independent Examination under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Subsequent Examination Hearing Sessions were held in March and April 2025, with an additional hearing on 4th September 2025. The Inspectors recommended a number of Main Modifications to the Plan in order for it to be found legally compliant and sound.
- 5.7.2 The Main Modifications consultation was held between January and February 2026, including the Schedules of Main Modifications and accompanying SA and HRA of the Main Modifications.
- 5.7.3 No comments were received in relation to the Main Modifications SA during the consultation.

5.8 Comments on the SWDPR

- 5.8.1 The Statement of Consultation³⁷ sets out how the SWDPR has been prepared in line with the consultation requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It summarises the stages of consultation undertaken, including who was consulted and the methods used, and provides an overview of the main issues and representations received from stakeholders and the public. The document also explains how these representations have informed the evolution of the SWDPR, demonstrating that the preparation process has been transparent, inclusive, and responsive, and that the legal requirements for public participation were met prior to submission for independent examination.
- 5.8.2 A summary of responses to each consultation is provided on the SWDPR website³⁸ and the SWDPR Examination Library³⁹.
- 5.8.3 Overall, the consultation process has played an important role in refining both the SWDPR and the accompanying SA. Responses from statutory consultees and the public have informed updates to the evidence base, strengthened the treatment of key topics such as biodiversity, heritage and water management, and contributed to the evolution of policies and site allocations. The SA has provided a structured framework through which these representations have been considered, ensuring that consultation outcomes have been incorporated in a transparent and proportionate manner.

³⁷ South Worcestershire Development Plan Review Regulation 22 Statement of Consultation. Available at: https://017f5bf8-ff4d-415b-be58-79dae2836c33.usrfiles.com/ugd/017f5b_2024d31181a643b3993c20653722fae5.pdf [Date accessed: 08/04/26]

³⁸ South Worcestershire Development Plan Review. Available at: <https://www.swdevelopmentplan.org/> [Date accessed: 07/04/26]

³⁹ SWDPR Document Library. Available at: https://www.localplanservices.co.uk/files/ugd/017f5b_19e30f5f40f54a6990cbff70df85c923.pdf [Date accessed: 08/04/26]

6 How the environmental and sustainability effects of the plan will be monitored

6.1 Monitoring

6.1.1 The SEA Regulations require that significant effects resulting from the implementation of the plan should be monitored. SEA Regulation 17 states that:

6.1.2 *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”.*

6.1.3 The monitoring requirements typically associated with the SA process are recognised as placing heavy demands on authorities with SA responsibilities. For this reason, the proposed monitoring framework focuses on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.

6.1.4 Monitoring the impacts of the Local Plan should seek to answer:

- Was the likelihood of sustainability impacts identified in the SA process accurate?
- Is the Local Plan successful in achieving its desired sustainability objectives?
- Are mitigation measures performing as expected?
- Are there any unforeseen adverse impacts of the Local Plan, and are these within acceptable limits or is remedial action required?

6.1.5 Monitoring proposals for the SWDPR, as presented in the Table 17.3 of the Regulation 19 SA report, are set out in **Table 6.1**.

Table 6.1: Monitoring proposals for the SWDPR as presented in the Regulation 19 SA Report

SEA theme	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
	Traffic flows on main roads	Bi-annually, Plan area wide	Decrease
	Rates of public transport uptake	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
	Number of Planning Approvals granted contrary to the advice of Natural England or Worcestershire Wildlife Trust	Annually, Plan area wide	Zero
	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease
	Renewable energy generation	Annually, Plan area wide	Increase
Cultural heritage	Number of Conservation Area appraisals	Annually, Plan area wide	Increase
	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease

SEA theme	Indicator	Scale and frequency	Target
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
	Number of GP Surgeries	Annually, Plan area wide	Increase
Landscape	Number of Planning Approvals granted contrary to the advice of the Cotswolds Conservation Board or Malvern Hills Partnership on the basis of adverse impact on the Cotswolds / Malvern Hills National Landscapes	Annually, Plan area wide	Zero
	Quantity of development in the open countryside	Annually, Plan area wide	Zero
	Change in tranquillity in the open countryside	Annually, Plan area wide	Zero
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
	Percentage of economically active residents	Annually, Plan area wide	Increase
	Lower Layer Super Output Areas (LSOAs) in South Worcestershire within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
	Quantity of household waste generation	Annually, Plan area wide	Decrease
	Use of public transport (bus and rail)	Annually, Plan area wide	Increase
Soil	Number of dwellings built on previously developed land	Annually, Plan area wide	Increase
	Number of dwellings built on BMV land (Grades 1, 2 or 3a ALC)	Annually, Plan area wide	Decrease
Water quality/ flood	Number of planning permissions granted contrary to Environment Agency advice	Annually, Plan area wide	Zero
	Quality of watercourses	Annually, Plan area wide	Increase
	Water efficiency in new homes	Annually, Plan area wide	Increase

6.1.6 The monitoring suggestions replicated in **Table 6.1** highlighted potential indicators and topics to track the environmental, social, and economic effects of the SWDPR, in line with the requirements of the SEA Regulations. These suggestions were considered by the SWCs as part of the Main Modifications and the adoption process. While the indicators themselves are not directly adopted as a separate monitoring list, they informed the overall approach to monitoring and help ensure that the implementation of the SWDPR can be assessed in terms of its sustainability outcomes. These considerations are reflected in the SWCs' formal monitoring arrangements, set out in Policy SWDPR 72 and its supporting text.

- 6.1.7 The SWDPR includes a monitoring framework through Policy SWDPR 72 (Implementation and Monitoring) and its supporting text. This sets out the Council's approach to monitoring the effectiveness of the Plan, including how policies and objectives are being delivered and whether any review is necessary. Monitoring will be carried out primarily through the South Worcestershire Authorities Monitoring Report (SWAMR), produced annually, to assess policy effectiveness, housing delivery, supplementary planning documents, and neighbourhood planning updates. The supporting text also explains how monitoring informs decision-making, tracks progress against the Plan's vision and objectives, identifies whether policies are achieving intended outcomes, and supports the preparation of Infrastructure Funding Statements to track the use of developer contributions. The policy also identifies circumstances that could trigger a Plan review, such as failure to deliver strategic policies, changes in national planning guidance, or evidence from monitoring.

Habitats Regulations Assessment

Sustainability Appraisal

Strategic Environmental Assessment

Landscape Character Assessment

Landscape and Visual Impact Assessment

Green Infrastructure

Expert Witness

Ecological Impact Assessment

Habitat and Ecology Surveys

Biodiversity Net Gain



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