

Appendix 7: Consultation Responses

Responses to Formal Consultation on SWJCS SA Scoping Report (July-August 2007)

Section of Scoping Report		Consultee Comments/Responses	Enfusion Comments
Natural England			
Chapter 3 - Legislative Context	<i>Section 3.2 Pg. 12</i>	<p>We propose that the following are taken into consideration within the SA:</p> <ul style="list-style-type: none"> 'Biodiversity by Design – A guide for Sustainable Communities' Town & Country Planning Association. National context. <i>This document offers case studies from across Western Europe.</i> The work of the Abberley and Malvern Hills Geopark (Regional context). Worcestershire Geodiversity Action Plan when available (County context) – The first stage (consultation) has been completed. Worcestershire County Council Rights of Way Improvement Plan (County context) 	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p>
Chapter 4 – Baseline Data Context	<i>Table 4.3 Pg. 30</i>	With reference to Special Wildlife Sites (SWS) (pages 31& 57) it should be noted that the review of SWS in Malvern Hills district is complete and area data for these sites should now be available.	Noted
Chapter 5 – Sustainability Appraisal Framework	<i>Table 5.1 Pg. 42</i>	Natural England welcomes the changes made to the SA objectives following our meeting on 9 May 2007 (Please see Annex A). We also acknowledge the views expressed by those attending the Workshop event on 11 July 2007, in particular the potential scope to integrate those objectives where complementary subject areas exist. The Regional Sustainable Development Framework document provides useful examples of SA objectives, the wording from which may be helpful in resolving some of the criticisms expressed at the workshop.	Noted

Environment Agency			
Chapter 1 - Introduction	Section 1.17 Pg. 4	<p>If both the SFRA and the Water Cycle Study are to be in a combined document we recommend that this be stated in section 1.17, as below:</p> <ul style="list-style-type: none"> Environmental Constraints Study and Green Infrastructure Strategy-Being produced by Faber Maunsell <p>Includes: Strategic Flood Risk Assessment Water Cycle Study</p>	Agreed
Chapter 3 – Legislative Context	Table 3.2 Pg. 13	<p>We suggest that 'Draft PPS Planning and Climate Change' be amended to 'Draft supplement to PPS1: Planning and Climate Change' and also be located beneath PPS1: Delivering Sustainable Development in the table.</p>	Agreed
		<p>'PPG25 Development and Flood Risk' should be amended to PPS25 Development and Flood Risk as this policy, adopted in December 2006 supersedes PPG25.</p>	Agreed
	Table 3.3 Pg. 14	<p>Groundwater Protection Policy and Practice' - Public Consultation <u>Draft</u> (March 2007) will soon supersede Groundwater Protection Policy and Practice (1998) and therefore we recommend that this document should also be listed.</p>	Noted and Agreed
		<p>In addition, we recommend the following documents be added to Chapter 3:</p> <ul style="list-style-type: none"> Planning Circular 3/99 – DETR Circular 03/99/WO10/99 Water Services Infrastructure Guide – A Planning Framework (see http://www.environment-agency.gov.uk/commondata/acrobat/wsig_1760260.pdf) <p>Hidden Infrastructure - The pressures on environmental infrastructure (http://publications.environment-agency.gov.uk/pdf/GEHO0307BMCD-E-E.pdf)</p>	Agreed
	Table 3.5 Pg. 18	<p>Theme 3: 'How can the Joint Core Strategy protect and enhance levels of biodiversity?' Source or evidence: Add PPS9: Biodiversity and Geological Conservation.</p>	Agreed
		<p>Theme 4: 'How can the Joint Core Strategy manage and reduce flood risk?' Source or evidence: PPG25 should be changed to PPS25</p>	Agreed

		Add Draft supplement PPS1: Planning and Climate Change	
		Theme 5: 'How can air and water quality monitoring requirements be expressed in Joint Core Strategy policies?' Source or evidence: Add PPS23: Planning and Pollution Control	Agreed
		Theme 8: 'Water Resource Management: -are there sufficient water resources to supply demand from the planned scale of development? -how can the Joint Core Strategy minimise water usage?'	Agreed
		Theme 10: 'Reduce, reuse, recycle: how can the Joint Core Strategy support the waste hierarchy?'	Agreed
		Theme 11: 'Reducing the need to travel and promote sustainable integrated transport systems.'	Agreed
		We suggest the following theme be included in Table 3.5: Theme: Brownfield regeneration. How can the Joint Core Strategy promote the regeneration and remediation of Brownfield sites? Source or Evidence: PPS3: Housing, PPS23: Planning and Pollution Control	Agreed
	Section 3.7 Pg. 19	We suggest the following amendments to the summary of the themes derived from the review of PPPs. <ul style="list-style-type: none"> • Protect and enhance biodiversity across the South Worcestershire area. • Reduce and sustainably manage demands for water, land and other finite resources. ADD: <ul style="list-style-type: none"> • Manage and reduce flood risk 	Agreed Agreed Agreed
Chapter 4 – Baseline Data Context		Foul Drainage: Both Malvern Hills and Wychavon are rural districts and as such there is a lack of mains sewerage in many locations. Historically, this has led to a proliferation of septic tanks and other non-mains systems, which have implications on groundwater and surface water, including private water supplies (wells, springs, boreholes, and other abstractions). In some instances, inadequate foul drainage poses a risk to such water sources, including many important river systems in the district, (in terms of water	Agreed

		<p>quality). Sustainable foul drainage systems must be promoted in line with order of preference in Circular 3/99, in the absence of a mains foul sewer. This recommends a package treatment plant in most cases, with appropriate risk assessment, to protect the water environment. We would also support 'first time sewerage' schemes to enable development to connect to a more sustainable system, in consultation with the relevant Sewerage Utility Company.</p> <p>This is an environmental issue that has not been highlighted within the various stages of the Scoping Report. We therefore recommend that the following baseline data be included in the report:</p> <p>Percentage of all new homes; and ground floor coverage (m2) of non residential development; connecting to the mains foul sewerage system.</p> <p>Percentage of all new homes; and ground floor coverage (m2) of non residential development; connecting to non-mains drainage systems.</p> <p>Note to above - It should be noted that any one of the above would of course inform the other i.e. if you record the one, you have the other data.</p> <p>The water cycle study should highlight specific areas in South Worcestershire which are experiencing foul drainage problems, particularly those in rural areas without non-mains systems. This evidence base would support a policy within the Core Strategy to ensure development should make satisfactory arrangements for foul drainage. For information, the Herefordshire Unitary Development Plan adopted March 2007 provides a detailed foul drainage policy, Policy CF2. The plan can be viewed at:http://www.herefordshire.gov.uk/housing/planning/29815.asp</p>	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>Noted</p> <p>Noted</p>
	<p>Section 4.2 Pg. 22</p>	<p>Reference to both the SFRA and the Water Cycle study is required in para 4.2. We suggest additional paragraphs are inserted here to address the SFRA and Water Cycle study.</p> <p>Strategic Flood Risk Assessment (SFRA): PPS25 states that 'a SFRA should be carried out by the local planning authority to</p>	<p>Agreed</p>

		<p>inform the preparation of its LDDs, having regard to catchment-wide flooding issues which affect the area.’ The SFRA will provide the basis from which to apply the Sequential Test and the Exception Test (see paras 18-20, PPS25) in the development allocation and development control process.</p> <p>Water Cycle Study: When allocating sites LDDs ‘must be sensitive to the need to make the most of areas with spare capacity in the water infrastructure and ensure that building rates do not run ahead of the completion of new infrastructure if, in any area, temporary capacity constraints are likely’ (Water Services Infrastructure Guide). The Water Cycle Study is utilised to highlight potential water infrastructure concerns in the area and identify options for growth/allocations.</p>	Agreed
	<i>Table 4.3 Pg. 30</i>	<p>We acknowledge the gap in contaminated land baseline data in table 4.3, which will be developed through the annual monitoring process.</p> <p>We advise that the LPA may wish to monitor the following in relation to Brownfield land:</p> <ul style="list-style-type: none"> • % of Brownfield land in the South Worcestershire area • % of new development on Brownfield land <p>We recommend that the following baseline data be collated as part of the evidence base:</p> <ul style="list-style-type: none"> • Additional areas (in ha) of remediated land in the district • Number of sites remediated in the district 	Noted Noted
	<i>Section 4.15 Pg. 34</i>	<p>Para 4.15 states that South Worcestershire “is, largely, free of contamination, pollution and degradation”. This is misleading as there are a number of Brownfield sites in South Worcestershire which are potentially contaminated, depending on their previous use. The quality of the land and soils needs to be protected and restored to enable them to be used beneficially and safely, and so that they are not a source of contamination of controlled waters.</p>	Noted Agreed
	<i>Section 4.19 Pg. 35</i>	<p>A similar statement (as above) is made in paragraph 4.19 “Industrial pollution is not a major issue for South Worcestershire”, again we consider that contamination is an issue in South Worcestershire and is an important consideration when Brownfield land is redeveloped. This issue needs to be reflected in policies within the Joint Core Strategy.</p>	Noted

			Agreed
	Table 4.3 Pg. 30	<p>Headline indicator: Extent of land in floodplain</p> <p>We suggest that it should be stated what extent of land is in Flood Zone 3, 2 and 1 under this headline indicator. This will indicate the proportion of land in Flood Zone 3 (high probability, >1% floodplain), Flood Zone 2 (medium probability, 0.1% floodplain) and Flood Zone 1 (low probability, <0.1% floodplain). In line with PPS25: Development and Flood Risk, preference should be given to locating new development in Flood Zone 1.</p>	Agreed
		<p>Headline indicator: Number of properties at risk from flooding – commentary-issues/successes:</p> <p>We recommend the following amendment: 'The SWJCS should promote development within Flood Zone 1.</p> <p>We also suggest that the following be collated as part of annual monitoring: "The number and percentage of new development in Flood Zone 3 and 2"</p>	Agreed Agreed
		<p>Headline indicator: Developments Incorporating Sustainable Drainage Systems</p> <p>We suggest the following also be collated: 'The number of additional, or percentage of all new development with SuDS'.</p> <p>Note to above - Whilst we do not hold data on the implementation of SuDS schemes linked to new developments, we suggest that your planning development control /building control department could be the 'source' for this information, or you may be able to produce a database report to provide the required data, following any grant of permission for example.</p> <p>Data Source and Year: Data should be collated on the above through annual monitoring reports.</p>	Noted Noted Agreed
		Headline indicator: Developments meeting EcoHomes standard and BREEAM standard	

		sustainably in accordance with PPS23.	
		In table 4.4 flood risk is identified as an issue. We suggest that the implication for the SWJCS should be reworded to the following: "Planning policy should reduce and manage flood risk, and avoid significant development on floodplains and optimise development to include Sustainable Drainage Systems and other flood prevention measures."	Agreed
		We recommend that water resources/quality be added as a sustainability issue. We understand that as associated baseline data has not been included this wouldn't have been highlighted as an issue. We expect that the Water Cycle study will provide evidence in relation to this issue. We would recommend that for any residential development with 20 homes or greater, that the developer contributes to the retrofitting of existing residential properties with water efficiency techniques, for example in areas where there is a known water resource problem. This is in addition to the requirement for the development itself to install such techniques, in line with the Code for Sustainable Homes. The retrofitting aspect is considered important given that we understand that there are water supply problems in parts of this area and there may be a need to manage water with the demand for new sustainable development proposals in this way. The Water Cycle Study would of course confirm this. On this note, we would also comment that developer contributions may be required to secure this along with a number of environmental enhancements. Such examples were given in our response to MHDC to their recent developer contributions SPD and included contributions for SuDS, flood warning and maintenance/upgrade of flood defences. We understand that technical papers are being prepared by the County and we would encourage work on a (Joint) 'developer contributions' document, including consideration of water efficiency, at the County level, to apply to all districts. We would be happy to discuss this aspect in due course.	Agreed
Chapter 5 – Sustainability Appraisal	<i>Table 5.1 Pg. 42</i>	We suggest that potential indicator 4 be amended to make reference to the levels set in the Code for Sustainable Homes:	

Framework		<p>Number of new residential units meeting level 3 and above as set by the Code for Sustainable Homes.</p> <p>This indicator should also be inserted under SA objective 13: Reduce the causes of climate change and adapt to its impact.</p>	Agreed
		<p>SA objective: Manage and reduce flood risk:</p> <p>Potential detailed indicators: We suggest indicator 1 be amended to "Number new residential units within Flood Zone 3 and 2". Also we recommend the following indicator be added: "Number and percentage of new development in Flood Zone 3 and 2".</p> <p>Note to above - We would suggest that the LPA record this data, when a planning application is approved, as best practice. We are not in a position to supply this information based on our records.</p>	<p>Agreed</p> <p>Noted</p>
Appendix 1 – Relevant Plans, Policies and Programmes	<i>Table 1.1</i> <i>Pg. 2</i>	<p>We recommend the following be added to the implications for the SWJCS associated with the Groundwater Protection Policy and Practice document: "Ensuring sustainable redevelopment and remediation of contaminated sites"</p> <p>We suggest implications for the SWJCS related to the Fluvial Severn Flood Risk Management Strategy (2006) be reworded to: "The Sustainability Appraisal should include objectives that seek to reduce and manage flood risk"</p> <p>City of Worcester Local Plan 1996-2011 (2004): Due to the inclusion of the floodplain policies (NE21-NE24) within the above Local Plan we suggest that the following be included under key targets and indicators relevant to the SWJCS: "Encourage the management and reduction of flood risk"</p>	<p>Agreed</p> <p>Agreed & addressed in new SA Objective No 14: Water</p> <p>Agreed</p>

		We consider that the draft Scoping Report addresses a majority of the environmental issues which should inform the Joint Core Strategy. We acknowledge that there are gaps in the evidence base, however these will be addressed following the completion of technical studies.	Noted
English Heritage			
Chapter 1 - Introduction		As part of the introduction to the Scoping Report, it might be helpful to set out how the Report and sustainability framework could be used to help inform the appraisal processes for other local development documents produced by the relevant districts. For example, the Scoping Report for the Joint Core Strategy to serve as the initial framework which can be tailored to the particular area or thematic focus of other LDDs. Such a tiering approach offers benefits in terms of avoid duplication of data collation, consistency of approach, and the more appropriate tailoring of appraisals.	Agreed
		Applicable to all stages of the appraisal process the historic environment must be broadly defined - all designated historic assets should be considered together with potential impacts on non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place, local identity and distinctiveness in both rural and urban areas. Statutory designations include Listed Buildings, Scheduled Monuments plus other nationally important archaeological sites, Registered Historic Parks and Gardens, Registered Battlefields, Conservation Areas, and the settings of all these assets. Other important elements of the historic environment, which are often without any statutory protection, include other archaeological remains, locally listed buildings, parks and gardens, landscape and townscape features, the historic character of wider the landscape / townscape, as well as the potential for as yet unrecorded archaeology.	Agreed
		English Heritage strongly advises that the conservation and archaeological staff of the Council and County Council are closely involved throughout the preparation of the Joint Core Strategy and its associated appraisal process. They are best placed to advise on: local historic environment issues and priorities, including access to data held in the Historic Environment Record (formerly Sites and Monuments Record); how policies and proposals can be tailored to minimise potential adverse impacts on the	Agreed

		historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.	
Chapter 3 – Legislative Context		We have several suggested additions to Table 3.1-3.4 which are detailed below. The inclusion of Table 3.5 on the derivation of broad sustainability objectives is helpful, and so is the detailed review of core plans and policies in Appendix 1.	
	Table 3.1 Pg. 12	<p><i>International – add:</i></p> <ul style="list-style-type: none"> • <i>European Landscape Convention</i>, which the UK Government has signed and ratified. The European Landscape Convention aims to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes throughout Europe. Landscape is defined as ‘an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors’. The Convention applies this definition to all parts of a country’s territory, <u>urban as well as rural areas, to both outstanding and ordinary landscapes, to degraded as well as well-preserved places</u>. It hence adopts a holistic approach to the landscape rather than focusing on special areas. The Convention’s definition of landscape and its emphasis on action/interaction, human factors and cultural perspectives is well reflected in English Heritage’s national programme of Historic Landscape Characterisation. <p>http://www.defra.gov.uk/WILDLIFE-COUNTRYSIDE/issues/landscap/index.htm</p> <p>http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm</p> <ul style="list-style-type: none"> • <i>European Spatial Development Perspective</i> - Paragraph (17) defines balanced spatial development as ‘reconciling the social and economic claims for spatial development with the area’s ecological and cultural functions and, hence, contributing to a sustainable, and at a larger scale, balanced territorial development’. The ‘conservation of natural resources and cultural heritage’ is identified as a fundamental goal of European policy (18). This translates into three policy guidelines for spatial development (19) of which ‘sustainable development, prudent management and protection of nature and cultural heritage’ is the key 	Agreed

		<p>environmental objective for promoting sustainable development. This is set in the context of the recognition that 'Natural and cultural heritage in the EU is endangered by economic and social modernisation processes. European cultural landscapes, cities and towns, as well as a variety of natural and historic monuments are part of the European heritage. Its fostering should be an important task for modern architecture, urban and landscape planning in all regions of the EU.'</p> <ul style="list-style-type: none"> • <i>Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention)</i> - The Convention contains provisions for the identification and protection of archaeological heritage, its integrated conservation, the control of excavations, the use of metal detectors and the prevention of illicit circulation of archaeological objects, and the dissemination of information. It was ratified by the UK in September 2000, and provides for a broad definition of 'archaeological heritage' that includes 'structures, constructions, groups of buildings, developed sites, moveable objects, monuments of other kinds as well as their context, whether situated on land or under water. 	<p>Agreed</p> <p>Agreed</p>
	<p>Table 3.2 Pg. 12</p>	<p><i>National</i> – add:</p> <ul style="list-style-type: none"> • Note: the Government's statement on the historic environment '<i>The Historic Environment: A Force for our Future</i>' was published by DCMS in 2001. • Heritage Protection White Paper (March 2007). A summary of its main provisions is given at: http://www.helm.org.uk/server/show/nav.11237 • Planning (Listed Buildings and Conservation Areas) Act 1990 • Ancient Monuments and Archaeological Areas Act 1979 <p>In addition to the plans/programmes/policies highlighted above that directly relate to the historic environment we also wish to highlight the following links to the historic environment in other relevant PPS/PPGs. This is relevant in terms of the derivation of sustainability objectives as set out in Table 3.5:</p> <ul style="list-style-type: none"> • PPS 1: Delivering Sustainable Development - reference to protecting and enhancing the historic environment and the quality and character of the countryside, [Paragraph 5; ensuring high quality design [Paragraph 5]; a high level 	<p>Agreed</p> <p>Agreed</p>

		<p>of protection to the most valued townscapes and landscapes [Paragraph 17]; enhance as well as protect the historic environment and landscape and townscape character [Paragraph 27(ix)]; promotion of design which is appropriate for its context [Paragraph 34-5]; reinforcement of local distinctiveness [Paragraph 38]</p> <ul style="list-style-type: none"> • PPS 3 Housing: the importance of respecting local character (paras. 48-49). • PPS 7: Sustainable Development in Rural Areas - paragraphs 12, 15, 16, 17 and 34 are of particular relevance to the historic environment. PPS7 recognises that many country towns and villages are of considerable historic and architectural value. The document seeks a commitment to good design that makes an important contribution to local identity and regional diversity. It supports the re-use of existing buildings in the countryside where this would meet sustainable development objectives and the need to preserve buildings of historic or architectural importance. It identifies that the historic environment has a role in the economics of the region through tourism and leisure. • PPS 22: Renewable Energy [Paragraph. 9 (World Heritage Sites); Paragraph 11 (other nationally-designated areas)] 	
	Table 3.3 Pg. 14	<p><i>Regional – Add:</i></p> <ul style="list-style-type: none"> • West Midlands Green Infrastructure Prospectus. • Note that the Regional Cultural Strategy is due to be reviewed and updated. • The West Midlands Regional Historic Environment Forum is also in the process of developing a Regional Historic Environment Strategy. This is still at a very early stage and unlikely to be completed until the end of 2008. 	Agreed
	Table 3.4 Pg. 16	<p><i>Local:</i></p> <ul style="list-style-type: none"> • Other community based planning initiatives such as Parish Plans, Town and Village design statements could also be highlighted. • Should relevant District Supplementary Planning Documents be also included? For example the Worcester City Council SPD on Archaeology and the Historic Environment. • For subsidiary Scoping Reports it may be relevant to include relevant Conservation Area Appraisals and Management Plans. 	Agreed
	Table 3.5 Pg. 18	Table 3.5 is a useful summary device and we welcome its inclusion. However, it is surprising that the key theme of the historic environment and its future sustainable	

		management has not been identified as a key theme that the Joint Core Strategy should seek to address. As indicated above, the historic environment is an integral component of a wide range of international, national and regional policy as well as local level plans and should be recognised as such.	Agreed
Chapter 4 – Baseline Data Context		We recommend that there is a clear commitment to keep under review the data sources during subsequent stages of the appraisal. We recommend that the reporting process clearly identifies gaps in the baseline data and includes a commitment to consider how these can be addressed as part of the appraisal process for current and future Local Development Documents.	Agreed
		The inclusion of a written summary under each set of social, economic and environmental data is helpful in conjunction with the tabulated baseline data set out in Table 4.3 and Appendix 2. The approach of including a commentary on recent trends, comparators and issues/successes as part of the tabulated data is also useful.	Noted
		Notwithstanding the useful format of summary tables, we have a number of further recommendations regarding the scope and content of the data included for the historic environment. As underlined in our general comments, in establishing the baseline the historic environment should be broadly interpreted encompassing: <ul style="list-style-type: none"> • all designated historic assets; • non designated features of local historic interest; • the character of the wider landscape and townscape; and • the potential for as yet unrecorded archaeological interest. In this context we have the following recommendations to help ensure a robust consideration of the Districts' historic environment resource.	Agreed
	<i>Table 4.3 & Appendix 2 Pg. 30 & Pg. 54</i>	The data in Table 4.3 (page 34) and Appendix 2 (60) includes a good range of data on the designated historic assets of the three districts. However, there are omissions and a better degree of consistency of data presentation across the three districts would be helpful. This is especially true for the 'sites of particular historic interest' which is based on the County's HERs. For example, the number of Registered Parks and Gardens in each district should be clarified together with any locally listed parks and	

		gardens of interest. No mention is made to Registered Battlefields. Locally listed buildings of historic or architectural interest should be highlighted – for example Worcester City hold an Inventory of Buildings of Local Significance. The ‘gap’ for Worcester under ‘sites of particular historic interest’ is unclear given that the City has its own dedicated archaeologist and key baseline resource such as the City’s own HERs, an Urban Archaeological Database and accompanying Urban Archaeological Strategy [all this is described in the pre-adoption SPD on Archaeology and the Historic Environment].	Agreed
		Note also that consideration must be given to Scheduled Monuments <i>and</i> other nationally important archaeological remains - since not all are scheduled.	Noted
		For all designated assets, setting issues are also relevant to the baseline.	Agreed
		The condition of the historic resource is an important consideration. This is addressed in part through the reference to Listed Buildings at Risk. Note that the 2007 national Buildings at Risk Register is due to be published in late July with updated figures for Grade I and II* listed buildings (and structural Scheduled Monuments). Grade II listed buildings are not currently monitored under the national register. However, Grade II buildings form the vast majority of the listed resource, and an up-to-date at risk register for them may be an information gap and should hence be highlighted as part of the baseline. At risk surveys of locally listed buildings should also be checked and identified as an information gap if not available.	Noted
		English Heritage has completed a Scheduled Monuments at Risk survey for the region, the results of which have been made available to the County Council’s Historic Environment Record. Preliminary results of the survey are available via the Heritage Counts website, but more detailed results for Worcestershire are available and should be highlighted in the baseline.	Noted and Agreed
		The potential for as yet unrecorded archaeological interest should also be highlighted.	Agreed
		Conservation Areas - Apart from the broad contextual information on their number an indication of their area extent in comparison to the district area would be useful. It should be noted that the BVPI on conservation areas has been introduced (Reference: ODPM BVPI 2005/6 Report) and should ideally be reflected in the baseline. The indicator has three parts: (i) total number of conservation areas in the local authority area; (ii) percentage of conservation areas in the local authority area with an up-to-date character appraisal; (iii) percentage of conservation areas with published	Agreed

		management proposals. Any existing information on these criteria should be obtained from the local authorities' conservation staff.	
		In conjunction with the quantified data on conservation areas and management plans outlined above, consideration should also be given to including qualitative data on the condition and or pressures for change that these areas are typically subject to. Discussions with the District's conservation team should inform this.	Agreed
		<p>The baseline data given for the historic environment is predominantly site specific and consideration should also be given to the historic character of landscapes and townscapes. Whilst the range of designated and non designated historic assets are of intrinsic value, in combination they also make a fundamental contribution to the distinctive character and sense of place and identity of rural and urban areas. Landscape Character is dealt with as a sub-set of the headline indicator 'land designations' and appears to rely on the County landscape character assessment? Whilst this includes some consideration of the cultural dimension of landscape character, the County Council is in the process of undertaking a complementary Historic Landscape Characterisation project. This will cover the rural areas of the county and will provide a more detailed understanding of the historic character of the present day landscape and hence further extending our knowledge of what gives an area its distinctive character and sense of place.</p> <p>As part of the baseline summary (both under the historic environment theme and landscape theme) reference must be made to the County Council's Historic Landscape Characterisation project. We strongly recommend that the County Council's officer responsible for developing further the HLC and its application (Adam Mindykowski) should be contacted to update on relevant areas of work that will serve to input to the baseline data for the Districts rural and urban-fringe areas.</p>	<p>Agreed</p> <p>Noted and Agreed</p>
		For the Districts' urban areas and smaller settlements, conservation area appraisals will describe the historic character of these defined areas. Consideration, however, should also be given to the need for further urban characterisation data for townscape areas outside of conservation areas but under potential development pressure (e.g. suburban areas) or likely to be subject to major change. There are a range of approaches to urban characterisation studies (as for example extensive and intensive surveys of historical significance developed in the context of areas of low	

		demand housing (a) and rapid assessments for suburban areas (b). We are currently in discussion with Worcester City Council regarding a possible urban characterisation project for the built up area of the City.	Noted
		Related to Worcester's growth point status we wish to draw your attention to a piece of work Shropshire County Council is undertaking, part funded by English Heritage, in using the county HLC to determine the sensitivity and capacity of the urban-rural fringe area surrounding Shrewsbury (another growth point local authority) to accommodate new development and identify green infrastructure opportunities. It is envisaged that this project will provide an approach that can be replicated elsewhere to help inform decisions as to the location, scale and planning of development. The project report is due to be completed in the autumn and will be disseminated to all the County leads on HLC. The application of the approach may present a relevant mitigation measure at the later stages in the appraisal process.	Noted
		Other relevant baseline data sources include: - Parkland loss. As part of the national Heritage Counts report in 2005, data is presented on the loss of historic parkland over the period 1918-1995 – the results of which are now available by local authority area in the national and regional summaries for the 2006 edition of heritage counts (on the website).	Noted
		Traditional farm buildings are typically under represented in statutory listings, but represent a fundamental part of an area's rural historic environment resource and equally subject to a range of development pressures. General baseline data on traditional farm buildings is also available in the 2005 national Heritage Count report relating to their condition and levels of conversion (reported by joint character area). Available via the HELM website http://www.helm.org.uk/server/show/nav.9495 a more detailed summary is given for each region by joint character of their characteristic traditional farm building stock in a series of preliminary regional character statements. Worcestershire County Council, have commenced a mapping project of traditional farm buildings which is due to be extended with support from English Heritage (contact: Adam Mindykowski, Worcestershire County Council). Consideration should also be given to using more qualitative data, as for example resident satisfaction surveys. With respect to the historic environment one of the key indicators of the national Heritage Counts Report is participation in the historic	Noted

		environment, as for example visits to historic sites.	
	<i>Table 4.4 Pg. 36</i>	<p>Again the inclusion of Table 4.4 is a useful summary device. Implications for the historic environment are dealt with under Issue 6 (development pressure). The general thrust of the commentary is welcomed, although issues such as the indirect impacts of development allocations on the historic environment should also be recognised as well as opportunities. For example, the following list provides examples of the environmental problems, issues and opportunities which we would typically expect authorities to take into account in the SEA/SA process.</p> <ul style="list-style-type: none"> • Areas of significantly degraded landscape / townscape or areas where, on current trends, there is likely to be further significant loss of landscape/ townscape character or quality, this including historic views and skylines. • Areas where development has had or is likely to have significant impact upon the historic environment and or people's enjoyment of it. • Areas where landscape character or quality is being eroded because of changing farming or other land management practices. • Traffic congestion, air quality, noise pollution and other problems affecting the historic environment. • Declining condition of historic assets because of poor maintenance and management etc. • Opportunities for heritage-led regeneration. • Opportunities for the development of the environmental economy (the historic environment a key component of a high quality environment). • Opportunities for the sustainable reuse of historic buildings. • Opportunities for delivering the improved maintenance and management of historic assets – enhancement as well as protection. • Opportunities for providing better access and understanding of the historic environment. • Opportunities for the historic environment to inform the design and planning of new development 	<p>Noted</p> <p>Agreed</p>
Chapter 5 – Sustainability Appraisal	<i>Table 5.1 Pg. 42</i>	With regard to the draft framework (Table 5.1) we have the following comments on the headline objectives. These draw on our initial comments forwarded to help inform discussions at the Stakeholders Event.	

Framework		As a general comment the format of Table 5.1 is helpful in showing the derivation of the appraisal framework from the preceding stages. We also welcome the inclusion of decision-making in support of the headline objective.	Noted
		Objective 4 - urban renewal An additional decision-making criteria could consider the reuse of existing buildings and extend indicator (3) on PDL. Consideration of question (3) will need to link to other objectives and decision-making criteria to avoid the simplistic assumption that minimising development on Greenfield land will avoid environmental impacts.	Agreed and now included in new SA Objective No 5: Quality Design & Sustainable Construction
		Objective 6 - facilities Cover accessibility to cultural facilities as part of this objective	Agreed and now included in new SA Objective No 6: Health
		Objective 10 - participation in local decision-making Could community based initiatives e.g. parish plans, village design statements be included here - preparation and adoption?	Original draft SA Objective deleted as this is implicit in SA and LDF processes
		Objective 12 - waste Suggest include a reference to encouraging the reuse of the empty or underused buildings. This is an important theme for the long term and sustainable management of the historic building stock as well as having wider sustainability benefits such as reducing waste arising from demolition - a major element of overall waste production.	Agreed and now included in new SA Objective No 5: Quality Design & Sustainable Construction
		Objective 13 - climate change Question (6) could be expanded to refer to encouraging the introduction of energy efficiency measures in existing buildings not just new build e.g. linking to renewal and reuse opportunities, change of use.	Agreed and now included in new SA Objective No 7: Climate Change
		Objective 16 - landscape character As highlighted previously there is a large degree of overlap between the historic environment and the landscape topic in terms of safeguarding the historic character and quality of rural landscapes. As currently set out Question 1 should also embrace the historic character of the landscape as will be described by the County's historic landscape characterisation. Indicator (1) is unclear and the use of the national programme 'Countryside Quality Counts' may offer a better fit. Indicator (3) only addresses biodiversity - and again underplays the cultural aspects of landscape	Noted

		<p>character. We suggest you contact the County Council to discuss whether there is the opportunity to develop an indicator based on the area of sensitive character types which have been altered and their character eroded. This approach has been developed elsewhere, but we acknowledge that it is dependent on the extent to which the respective LCA and HLC have moved on from a descriptive tool to one that looks at the sensitivity and capacity of the landscape to accommodate change (note also the scope of the Shrewsbury project described above).</p>	
		<p>Objective 18 - townscape quality</p> <p><i>Headline Objective</i></p> <p>We recommend that the headline objective is focused more specifically on the historic environment (by comparison there are two objectives strongly linked to biodiversity – 17 and 20). The headline objective gives the impression of equating the historic environment with only urban areas. We acknowledge and agree that the historic assets – from historic buildings and other features to historic street patterns - all make a fundamental contribution to the distinctive character and quality of urban settlements. But it is also a fundamental element of the historic resource and character of the countryside.</p> <p>We strongly recommend that the headline objective is amended to give a distinct objective on the historic environment. Informed by the approach of the other headline objectives a possible approach could be: <i>'protect, enhance and manage the historic environment and the historic character and quality of landscapes and townscapes'</i>.</p> <p>Other variations, which are typically included in our general advice, and which can be tailored to an appraisal framework are:</p> <p><i>To protect, enhance and manage historic buildings, areas, and archaeological remains, and their settings, the historic character of landscapes and townscapes and other features and areas of historic and cultural value'</i>.</p> <p><i>To preserve, protect and enhance sites, features and areas of archaeological,</i></p>	<p>Agreed and now included in new SA Objective No 12: Historic Environment</p>

		<p><i>historical and cultural heritage importance.</i> <i>Preserve, protect and enhance conservation areas, listed buildings, archaeological remains, historic parks and gardens, and their settings, and other features and areas of historic and cultural value.</i></p> <p><i>Decision-making Criteria</i> We also recommend that the decision-making criteria should be tailored to better reflect relevant themes for the historic environment. A supplementary annex of possible detailed decision-making criteria is attached for information. Given the approach of the framework and other decision-making criteria, question (1) could address the protection and enhancement of historic assets (as per the scope of the baseline). The second question, which is currently rather vague, could focus on safeguarding the historic character and quality of townscapes (see comments on including the rural dimension of historic landscape character under objective 16) – this would include encouraging high quality design in new development.</p> <p><i>Suggested Indicators</i> We welcome the continuing dialogue with the City Council on developing suitable indicators for the historic environment. The proposed indicators described in the Scoping Report offer a useful basis to work forward on. We acknowledge that this element of the appraisal framework is very much work in progress with regards the historic environment, perhaps more so than the other appraisal themes due to the continuing problems of collating consistent and robust data sets on all aspects of the historic environment – and applying the data so that it is meaningful for the appraisal process. As such we hope that it can be prioritised as a theme which requires further consideration and update as the appraisal process is taken forward. As indicated English Heritage is happy to continue to liaise with the Councils on this.</p>	<p>Noted</p>
		<p>Further to the initial commentary provided by the Council, we have a number of observations on the indicators proposed in the Scoping Report which we would be happy to discuss in more depth:</p> <p>(1) Given the limited scope of the National Buildings at Risk Register, ideally this should cover Grade II buildings and locally listed buildings at risk. At risk data is also now available for Scheduled Monuments – and includes an assessment category linked</p>	<p>Noted</p>

		<p>to development impact on a site and its setting. It might be possible to interrogate the supporting data set to see if it could be better tailored to the monitoring framework – e.g. in south Worcestershire are a significant number of Scheduled Monuments at risk because of predominantly development type impacts rather than say agricultural practices? If so this might be an appropriate indicator to include?</p> <p>(2) This is unclear and overlaps with indicator (5)?</p> <p>(3) Also include adopted management plans. A more sophisticated indicator on monitoring change in the character of conservation areas (and other valued townscape areas) would offer a better 'outcome' indicator, although would require the setting up of a suitable monitoring framework. A proxy measure might be derived based on correlating consent data with enforcements/compliance. As commented previously monitoring consent figures as a stand alone data set would require accompanying assumptions e.g. consents approved because imply no change to the character or appearance of the conservation or deliver benefits.</p> <p>(4) This is very much process orientated and difficult to interpret impacts.</p> <p>(5) Useful as an overall qualitative measure, but not necessarily a direct measure of the status and quality of historic assets.</p>	
		<p>Also:</p> <ul style="list-style-type: none"> • Omission – archaeology is not covered - perhaps look at the use of planning conditions for archaeology and compliance? • See also comments on monitoring change in landscape character. • Consideration also needed on positive enhancement / management changes e.g. the renewal and reuse of buildings of historic/architectural interest – bringing back into sustainable use, improvements in the management of historic assets (e.g. planning conditions). 	Noted
Chapter 6 – Remaining Stages of the Appraisal		We would reiterate the importance of closely involving the conservation and archaeological staff of the Districts and County Council throughout the assessment process, this including the evaluation of significant effects (adverse or beneficial).	Agreed
		<i>Impact Identification and Predication</i>	

		<p>Potential significant effects on the historic environment can involve the following general categories:</p> <ul style="list-style-type: none"> • Loss or damage to any heritage asset and/or its setting • Conservation and enhancement of any heritage asset • Loss of or erosion of historic landscape/townscape character 	Noted
		<p><i>Assessment of Effects</i> When assessing the significance of impacts on the historic environment (and the monitoring of significant effects), including within this architectural and historic landscape quality, the following should be considered:</p> <ul style="list-style-type: none"> • Rarity and trends • The historic environment is irreplaceable • Thorough understanding of the historic environment can inform new development and avoid or reduce significant impacts • The inextricable link between the historic and natural environment and landscape • Cumulative impact. When considering impacts on the historic environment, care must be taken before concluding that impacts on individual heritage sites are not strategically significant. This is because individual sites can have regional or national significance, perhaps through scarcity or individual associations, or because the cumulative minor impacts on a range of individual sites becomes significant or the effect of small impacts, or loss of features, which are not significant individually 	Noted
		<p><i>Mitigation</i> It is recommended that a broad interpretation of mitigation measures is adopted to accord with Government guidance and the SEA Directive. This should be in terms of preventing, reducing or off-setting significant effects, in addition to considering opportunities for enhancement.</p>	Noted
		<p>Overall, there is much to welcome in the layout and presentation of the Scoping Report. It provides a clear explanation of the appraisal process, the work carried out to date, and planned future work. The linkages between the main body of the text and appendices are clear, and the relationship between each stage in the appraisal process is explained well. Our comments primarily relate to the treatment of the historic environment and for each appraisal stage seek to strengthen the consideration of this core topic.</p>	Noted

Responses to SA Report SWJCS Issues & Options (November – December 2007)

Section of SA Report	Consultee Comments/Responses		Enfusion Comments
Alasdair Jones (on behalf of Hallam Land Management) Stoneleigh Planning (ID 47)			
General		Finally mention must be made of the Sustainability Appraisal Report. Hallam Land consider many of the findings in relation to the options for accommodating growth in the sub-region to be poorly expressed and unsound resulting in misleading assessments of the broad areas for growth around Worcester. It is considered that any meaningful appraisal can only realistically take place following the identification of strategic areas of land for development which would then be susceptible to appraisal under the terms expressed in Policies SR2 and SR3 of the Phase Two Review of the RSS.	Sustainability appraisal is a statutory process undertaken iteratively as part of the plan making process. Appraisal begins at the issues and options stage and continues until submission (and subsequently should significant revisions take place post submission). Appraisal is undertaken against objectives set out in the Sustainability Appraisal (SA) Framework developed specifically for the SWJCS. The methods and approach for developing the SA Framework, including stakeholder engagement and reference to extant appraisal processes is set out the SA Scoping Report.
Issue 1	<i>Section 5.4 Pg. 26</i>	We note that the Sustainability Appraisal controversially considers that; the hierarchy referred to in Option 1, as a basis for the distribution of growth,	The appraisal notes that with respect to the objectives set out

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		would result in a continuation of current unsustainable patterns of development. This is questionable because the RSS Review takes the view that focusing development on the Settlements of Significant Development such as Worcester will deliver sustainable communities which are able inter alia, to balance housing and employment opportunities; to provide social infrastructure and services to meet the needs of the expanded settlement; and are/or will be capable of developing good accessibility by public transport.	in the SA Framework there are potential sustainability issues associated with Option 1 that may require mitigation. The comments in relation to the RSS view are noted.
Issue 2		Once again, we must take issue with the Sustainability Appraisal of the 5 options under this issue. Against the background of existing and emerging RSS Policy, it cannot be appropriate to suggest that strategic growth of Worcester is a less sustainable strategy for growth than a series of smaller urban extensions to the Urban Centers set out in Option 3. Concentrating development at Worcester will provide longer term benefits to the City via improvements to its transport and social infrastructure and will attract significant investment in new employment. A scatter of growth across the other towns, would not, in our view, provide the potential for sustainable transport solutions since these usually require significant levels of growth before the thresholds of better service provision can be crossed. A more 'diluted' spread of transport investment related to a wider distribution of new housing and employment across South Worcestershire will not achieve the objective to locate development in a manner that reduces the Carbon Footprint.	The assessment considers the options against the SA objectives and decision aiding questions set out in the SA Framework. The assessment does not identify development at Worcester as unsustainable, indeed it notes that with regard to transport, development around the City provides greater potential for sustainable transport solutions.
Issue 4		Finally we note that the Sustainability Appraisal of the Options for Growth which are now put forward appear to suggest that development to the west of the City is the least sustainable direction of growth. We take a contrary view and our response to the points made in the appraisal is as follows: <ul style="list-style-type: none"> ▪ Development to the east would not enjoy good access to the local road network as it would generate traffic movements across the 	Noted.

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		<p>A4440 ring road that will increasingly conflict with the north/south flow of traffic along that route. That same route, in turn, provides links to Junctions 6 and 7 of the M5 and would therefore, encourage car borne journeys to work along the M5 corridor, from development sites in this sector of the City.</p> <ul style="list-style-type: none"> ▪ It is not clear how development to the east would support smaller settlements unless specifically designed to act as lower level service centers for nearby villages. ▪ Land to the north west of the City lies outside the floodplains of the Rivers Teme and Severn and is capable of accommodating strategic levels of growth without recourse to that land within or adjacent to acknowledged floodplains. ▪ Development to the west is no different to other sectors of the City in that all will need to be supported by improvements to the local transport infrastructure. We have already notes that a strategic development to the west of the City could be progressed in the short term based on a mix of local network junction improvements and a package of public transport measures to improve access to the City. ▪ Development at this location discourages longer distance community choices along the M5 corridor when compared with sites to the east and south/east. <p>In so far as the evaluation of the options for the directions of growth of the City are concerned we find the evaluation set out in the Sustainability Appraisal to be unsound. For example, both land to the south and west of the City lie outside the floodplains of the Severn and the Teme, yet on this issue, it is only the land to the south that is recorded as the more sustainable option, when in effect both, at this level of evaluation, enjoy the same merits. We therefore consider the sustainability appraisal that accompanies the</p>	<p>SA is a statutory requirement and that supports and informs plan making. The concept of 'soundness' relates to the JCS and not to the Sustainability Appraisal/SEA. The requirement is for the Local Authorities to</p>

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		Issues and Options Report does not provide a sound basis on which to evaluate the various alternative growth scenarios for Worcester and South Worcestershire.	have undertaken the SA/SEA process in accordance with regulation and demonstrate that this process has been appropriately integrated with plan making. SA/SEA is one part of a wider evidence base that supports plan making.
Ms Amanda Smith, Regional Planner, English Heritage West Midlands Region (ID 65)			
Appendix III	<i>Issue 2 Option 2 Pg. 5</i>	The accompanying summary of the sustainability appraisal indicates a neutral assessment for land on the edge of Worcester although a less certain result of other towns. Why is Worcester assessed as neutral?	The neutral assessment reflects the relative balance between potentially negative impacts on the health of communities within built-up areas, decreases in the amount of open space available for recreational activities; constraints relation to the setting and townscape and the potential positive impact arising from more sustainable transport solutions and urban regeneration inherent in this option.
Appendix III	<i>Issue 26 Option 1 Pg. 43</i>	We query the sustainability appraisal analysis with respect to Option 1 – why would such an approach raise potential sustainability issues? It is more likely to help resolve existing sustainability problems and have beneficial effect by helping to ensure that development safeguards and enhances local character and distinctiveness.	The assessment notes that that option would need to promote good design but without placing restrictions/ limitations on innovation – hence the

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
			assessment noting that some negotiation may be required to realise SA objectives.
Sustainability Appraisal	<i>General</i>	We welcome the inclusion and general approach of objectives 5, 11 and 12. We also welcome the clear and succinct format and content of the appraisal – subject to several queries on the summary results presented in the Issues and Options paper (identified above).	Noted.
Sustainability Appraisal	<i>Indicators</i>	For the historic environment objective, two potential indicators are given (listed buildings at risk and conservation areas completed). As commented previously and discussed with the Council, we hope that these essentially state of the environment type indicators can be extended to provide a more attuned monitoring framework for the historic environment. Previous suggestions have included extending the 'at risk' indicator to all listed as well as local list buildings and scheduled monuments as reflected in the national Heritage at Risk Programme. For conservation areas this could be usefully extended to area with an up to date appraisal and published management plan.	Noted. The SA Report accompanying the Preferred Options will update potential indicators/ recommendations to the council for monitoring.
Mr David Crofts, Associate, RPS, (for Consolidated Rank Properties Ltd) (ID 69)			
General		RPS is concerned about the use of sustainability appraisal indicators for the various options under each issue. There are two reasons: First we consider that any document wishing to elicit a response at such as early stage of the planning process, either from professionals or the general public, should not attempt to lead respondents – however subtle and sophisticated the measurement.	Sustainability appraisal is a statutory process undertaken iteratively as part of the plan making process. Appraisal begins at the issues and options stage and continues until submission (and subsequently should significant revisions take place post submission).

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		Secondly far from being subtle and sophisticated, these indicators (++, - ? etc) are crude and simplistic ways of evaluating options.	<p>Appraisal is undertaken against objectives set out in the Sustainability Appraisal (SA) Framework developed specifically for the SWJCS. The methods and approach for developing the SA Framework, including stakeholder engagement and reference to extant appraisal processes is set out the SA Scoping Report.</p> <p>The summary finding presented alongside the Issues and Options are underlain by a more detailed assessment reported in the separate SA report – as noted at Appendix 1 of the SWJCS I&O Paper.</p> <p>The symbols referred to are not indicators. They are symbols summarising a qualitative assessment supported by an explanatory key and applied in relation to an SA Framework of objectives and decision aiding questions. The full SA method is explained in the 'Appraisal Method' section of the SA report</p>

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
			and applies recognised standards of appraisal.
	<i>Issue 1 Options 2 & 3 Pg. 3</i>	We consider Option 3 to be inappropriate as it is likely to lead to unsustainable development. It is also inappropriate to give this option the same SA rating as Option 2.	Disagree. The assessment reflects how the options progress the objectives set out in the SA Framework.
	<i>Issue 16</i>	It follows that the most effective option would be Option 1 although 3,4, and 5 all rate '+' in the SA. Only Option 2 of the specific options does not rate a '+'. Notwithstanding our general reservations about this approach it does seem to us that the options have been appropriately rated in this particular case.	Disagree but noted. See previous comments on assessment method.
	<i>Issue 19</i>	We consider the SA approach to be at is most unhelpful in respect of this particular issue.	Noted.
	<i>Issue 25</i>	In this particular case we consider the SA appraisal to be useful in identifying appropriate options. It is right that a question mark should be placed against Option 1 as planning authorities should wait for any revisions to PPS25 (itself on a year old) particularly in respect of stricter standards, or whether an entirely new approach not based on probability is adopted.	Noted.
Worcestershire County Council (ID 87)			
Mark Middleton, Head Planner, Worcestershire County Council (ID87)			
General		The assumptions and outcomes of the Sustainability Appraisal are questioned particularly with regard to the apparent absence of biodiversity and geodiversity data.	Biodiversity and Geodiversity baseline data supporting the SA is contained in the SA Scoping Report, published for consultation in June 2007 – no

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
			consultation comments from the County Council were received on this report.
Comments from the Historic Environment and Archaeology Service, Worcestershire County Council (ID87)			
General		The service supports and commends the comments made by English Heritage on the Sustainability Appraisal Scoping Report and particularly notes the acceptance of the recommendation that the conservation and archaeological staff of the District and County Councils are closely involved in the preparation of the Joint Core Strategy and that the historic environment should be developed as a key theme of the strategy.	Noted
Phil Vincent, Ecologist Worcestershire County Council (ID87)			
General		Sustainable development will not be achievable in the absence of adequate baseline biodiversity (and geodiversity) data analysis along with full consideration of biodiversity and geodiversity.	Biodiversity and Geodiversity baseline data supporting the SA is contained in the SA Scoping Report, published for consultation in June 2007 http://hub.whub.org.uk/home/swj-pub-sa-scoping-report-june07.pdf – no consultation comments in relation to biodiversity and geodiversity data were received from the County Council on this report.
General	Section 1.1.6	The SA grades are baffling.	The SA Method including the symbols and key is outlined and

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		<p>Section 1.1.6 claims that SA judges all aspects of sustainable development and Section 3.6 of the SA states that: The vision was appraised using professional judgement with the principles and priorities for action listed in the UK Sustainable Development Strategy.</p> <p>This does not appear to be so.</p>	<p>explained in the 'Appraisal Methods' section of the SA report.</p> <p>The appraisal of the Vision is outlined in detail in Appendix II of the SA Report.</p>
		<p>Whilst the review of relevant plans and programmes identifies 'maintaining and restoring biodiversity across the Joint Core Strategy area' as a key sustainability theme, wider biodiversity, i.e. biodiversity outside of designated sites (SSSIs and special wildlife sites) does not appear to have been adequately taken into account within the Scoping Report.</p>	<p>The SA Report accompanying the I&O paper summarises the outcomes of the scoping work. Full details of the scoping work are available in the SA Scoping Report at http://hub.whub.org.uk/home/s-wj-pub-sa-scoping-report-june07.pdf</p>
		<p>The UK Sustainable Development Strategy and the SA (Section 4.5) identify the importance of decision-making that is based on adequate baseline data, and in the absence of adequate data the UK Sustainable Development Strategy requires a precautionary approach.</p> <p>If, as appears to be so, wider biodiversity has not been adequately taken into account the JCS will not accord with sustainable development principles or meet (except incidentally) sustainable development objectives; particularly</p>	<p>The I&O has been appraised against the SA Framework developed specifically for the SWJCS. The objective for Biodiversity and Geodiversity is: To improve, restore and recreate biodiversity and geodiversity.</p> <p>The decision aiding questions supporting this objective are:</p>

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		where the Issues relate to placement of new development. Furthermore it will be unsafe to select preferred Options for such Issues in the absence of an analysis that is based on robust spatial evidence.	<ul style="list-style-type: none"> ▪ Enhance ecosystem functioning and reduce fragmentation ▪ Require green infrastructure to enhance biodiversity ▪ Respect and promote the value of geodiversity ▪ Protect and enhance designated and locally valued habitats and species <p>This approach ensures that alongside the statutory requirements – including Habitats Regulations Assessment, wider biodiversity issues are appropriately considered.</p>
White Ladies Atson Parish, (ID40)			
The Vision		There is too much emphasis on the Central Technology Belt and we question where the Sustainability and Environmental Appraisals are to support this Vision?	The SA/SEA report and appendices include an appraisal of the proposed Vision.
Nicholas Freer on behalf of Gallagher Estates (ID116)			
Issue 1	4.1.4	We strongly disagree with the Sustainability Appraisal that seems to favour a different development strategy from that of the issues and options document and argues that Option 1 the least sustainable.	The role of the SA is to provide an appraisal of the policies presented in the Issues and Options document against the

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		<p>Across a range of sustainability indicators it is apparent that Option 1 offers by far the most sustainable option in comparison with options that result in more dispersal. To adopt a differing strategy would be to base the Core Strategy on an inadequate and unsupportable evidence base.</p>	<p>SA Framework objectives.</p> <p>The SA is undertaken against the SA objectives developed collaboratively with stakeholder and tailored to the regional priorities of the SWJCS.</p>
Issue 2	4.2.6	<p>We strongly disagree with the Sustainability Appraisal that seems to favour options 3 and 5 ahead of the chosen strategy in the RSS to focus strategic scale growth at Worcester.</p> <p>Across a range of sustainability indicators it is apparent that Options 2 offers by far the most sustainable option in comparison with options that result in more dispersal or new town development. This is the clear conclusion of the more detailed albeit higher level sustainability appraisal and technical assessment work carried out in completion of the submission RSS.</p>	<p>The SA reflects the potential SA impacts of the various options against the SA Framework. Positive assessments indicate that options have the potential to address identified sustainability challenges. Option 2 is not assessed as having key sustainability issues.</p> <p>The SA is undertaken against the SA objectives developed collaboratively with stakeholder and tailored to the regional priorities of the SWJCS.</p>
Issue 7		<p>The sustainability appraisal identifies the positive value of an employment location adjacent to the Worcester Parkway Station. The merit of such a location in terms of sustainability are considerably enhanced by the promotion of employment in this location as part of a mixed use urban</p>	<p>Noted.</p>

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		extension to the east of the City (see representations in respect of Issue 4) and must not be underestimated.	

Responses to SA Report SWJCS Preferred Options (September – October 2008)

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
Environment Agency – J Burnett			
The SA Framework	Section 3	EA consider that SA Objective 13 (minimise pollution) and 14 (sustainable water management) are not dealt with adequately as there is no reference to the need to protect water quality, quantity and the remediation of contaminated land.	The SA Framework was subject to consultation as part of the SA scoping process in 2007.

Responses to SA Report South Worcestershire Development Plan (SWDP) Preferred Options (September – November 2011)

Section of SA Report	Consultee Comments/Responses	Enfusion Comments
English Heritage		
	No further comments specific to the SA at this stage	
Environment Agency – J Burnett		
	No further comments specific to the SA at this stage since the points raised regarding evidence base gaps and improvements to the document in this response will need to be resolved and tested using the SA/SEA as a tool.	
34350 Natural England		
	<p>SWDP 8/1 (South Worcester) The policy should secure appropriate design & mitigation for potential sustainability risks identified by the SA for climate change, pollution and water. Fully support SA recommendation for mitigation (eg maintain flood zone as green network space – could be part of site's GI) of potential effects on water and wider biodiversity since the western site boundary is formed by the River Severn.</p> <p>SWDP 8/2 (West Worcester) The policy should secure appropriate design and mitigation for potential sustainability risks identified by the SA for climate change, biodiversity & geodiversity, landscape & townscape, historic environment, pollution and</p>	<p>Noted</p> <p>Noted</p>

Section of SA Report	Consultee Comments/Responses	Enfusion Comments
	<p>water. Fully support SA recommendation for mitigation of potential effects on water assets (eg through designation of green network space, GI enhancements). SWDP 8/3 East of Worcester Kilbury The policy should secure appropriate design & mitigation for potential sustainability risks identified by the SA for pollution and water quality</p> <p>SWDP8/4 North of Worcester Gwillams Farm The policy should secure appropriate design & mitigation for potential sustainability risks identified by the SA for climate change, historic environment, pollution and water.</p> <p>SWDP 8/5 Worcester Technology Park The policy should secure appropriate design & mitigation for potential sustainability risks identified by the SA for climate change, biodiversity & geodiversity, landscape & townscape, pollution and water.</p> <p>Fully support SA recommendation for mitigation of potential effects through provision of GI and appropriate water management measures. SWDP10 Copcut Lane Fully support SA recommendation for mitigation of potential effects on water quality and biodiversity for the watercourse along the northern part of the site.</p> <p>SWDP12 Cheltenham Road The policy should secure appropriate design & mitigation for potential sustainability risks identified by the SA for climate change, biodiversity & geodiversity, landscape & townscape, historic environment, pollution and water.</p> <p>SWDP 17 Development at Newland The policy should secure appropriate design & mitigation for potential sustainability risks identified by the SA for biodiversity & geodiversity, landscape & townscape, pollution and water.</p> <p>Fully support SA recommendation for GI mitigation measures to take into</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		<p>account wider biodiversity interest.</p> <p>SWDP 19/1 Land to North of Pershore The policy should secure appropriate design & mitigation for potential sustainability risks identified by the SA for climate change, biodiversity & geodiversity, landscape & townscape, pollution and water. Fully support SA recommendation that GI and SUDS should be a part mitigation measures.</p> <p>SWDP 19/2 Land to the NE of Pershore The policy should secure appropriate design & mitigation for potential sustainability risks identified by the SA for climate change, biodiversity & geodiversity, landscape & townscape, pollution and water.</p> <p>SWDP20 Tenbury Wells & Allocations Fully support SA recommendation for appropriate mitigation of potential effects on biodiversity and landscape through greenspace, replacement habitats, screening etc. Recommend reference to GI as a way of securing delivery.</p> <p>SWDP 51 Monitoring Framework The potential targets and indicators listed in table 10.1 in the SA seem useful and not overly onerous. In addition we would suggest that under SA Objective 10, Geodiversity Action Plan targets are monitored.</p>	<p>Noted</p> <p>Noted</p> <p>Noted and Agreed</p> <p>Noted and Agreed</p>
3440 Worcestershire County Council			
		<p>The SWDP should clearly set out how the Sustainability Appraisal and Equality Impact Assessment have influenced the choice of preferred options.</p> <p>SWDP10 - The rationale for deciding upon Copcut Lane as a location in preference to those discounted under 'Alternative Options considered' is not entirely clear. There is no reference to the Sustainability Appraisal consideration of this site, and some of the reasons cited for discounting</p>	<p>Agreed</p> <p>Noted</p>

Section of SA Report	Consultee Comments/Responses	Enfusion Comments
	alternatives could equally apply to Copcut Lane.	
3962 Worcestershire Planning and Development Panel		
	<p>The Sustainability Appraisal published for consultation does not make clear how it defines sustainability, or SA as a test for the location of development, presumably because the SA was prepared before the draft NPPF was in the public domain.</p> <p>The SA accepts that there will be significant negative impacts '<i>particularly from the extension sites</i>' (SA table 7.7) yet these sites are viewed as being 'more sustainable' locations for development in the Plan, which is clearly a contradiction.</p> <p>It is not clear how the consultation SA has addressed changes in circumstances since the 2007 issues and options paper or that it has adequately addressed certain conflicts in the current preferred options document such as (but not only) the impact on affordable housing of the reduced housing provision and reduced HAC grant.</p> <p>SWDP3 Overarching SD Principles - Recommend that all proposals should be accompanied by a Sustainability Report.</p>	<p>The SA is undertaken against objectives for sustainability set out in the SA Framework developed specifically for the SWLP & reflecting the sustainability issues identified for the S Worcestershire area. The methods are set out in the SA Scoping Report.</p> <p>The SA identified both potential significant negative & positive effects; it suggested mitigation possibilities for significant negative effects, which if implemented improve the overall sustainability.</p> <p>Sections 4 & 5 of the SA Report present the SA findings from Issues & Options and Preferred Options; Appendix 8 includes the updating of the baseline information.</p> <p>Agreed</p>

Section of SA Report	Consultee Comments/Responses		Enfusion Comments
6127 Anonymous			
		The failure to undertake a sustainability appraisal of site suitability is a fatal flaw in the SHLAA process.	The SA considers reasonable alternatives using the SA objectives agreed through the SA scoping process. The SHLAA is a separate process undertaken by the plan makers.
6068 Claines Action Group			
		<p>The SA does not deal with “impossible constraints” as follows:</p> <ul style="list-style-type: none"> ▪ landscape character will be irreversibly destroyed & open landscape will become closed ▪ carbon emissions will be increased ▪ GI Network will not be protected, nor GI coverage increased 	<p>The SA recognises 5 categories of significance of effects ranging from very positive (++) through neutral (0) and to very negative (-); the SA also recognises absolute constraints to proposed development (x red - for example, irreversible major adverse effects on internationally protected environment). LVIA & character analyses will be undertaken at the project level to inform masterplanning & details of mitigation possibilities. Agreed – the SA records negative effects for climate change. Disagree – the SA recommends that impacts on the conservation area will need mitigation &</p>

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		<ul style="list-style-type: none"> highest quality agricultural land will not be protected <p>No investigation of proper alternatives has been carried out and consultation feedback has not informed the choice of options. The option of "do nothing" (ie "keep it as it is") at Gwillams Farm & Old Northwick Farm has not been considered.</p> <p>"Analysis of problems and constraints is converted into a mere ranking exercise of options"</p>	<p>suggests opportunities for enhancing GI provision. Noted.</p> <p>The SA has appraised reasonable alternatives in accordance with legislation & guidance; the public have had the opportunity to comment on the alternatives (consultation I&O (2007), Preferred Options (2009, 2011). Overall, there is not an option for the Plan to do nothing since the Councils are required by statute to prepare a development plan. At the level of sites allocation, a "do nothing" option for Gwillams & Old Northwick Farm would mean that another site(s) would have to be identified in the strategic area. The identification & analysis of potential alternative options was undertaken at the previous stages of plan-making (2007, 2009 and 2011). The SA uses a framework of objectives for sustainability relevant to the SWLP area and analysis is made using professional opinion & against</p>

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		<p>"there is a lack of transparency in the SA"</p> <p>"Economic considerations have (in all probability) been prioritised above environmental..."</p>	<p>baseline information.</p> <p>All stages of the SA have been subject to public consultation. Social, economic & environmental factors are considered in the same way in SA & to the same level of assessment as required by the SEA Directive.</p>
Standard Letter Old Northwick Farm, Claines Recreation Ground, Gwilliams Farm (to be read in conjunction with 6068 Claines Action Group as above			
		<p>During last round of consultation, high levels of objections with regard to proposals at Old Northwick Farm & Gwilliams Farm but these objections not referred to in the SWDP (2011); the SA notes a positive effect for strengthening communities. Conflicts between increasing GI and housing proposals.</p>	<p>Noted.</p> <p>Consultation responses are a matter for the plan-making.</p>
6218 Evesham Hampton Residents Association			
		<p>The proposals for 2 greenfield sites for Evesham clashes with sustainability principles; suggestion to redevelop brownfield sites.</p>	<p>Noted – this is matter for the plan-making</p>
Gleeson & Welbeck Strategic Land (Agent: RPS)			
		<p>Additional evidence base reports indicate that there is overall positive benefit from the proposals on SA objectives for biodiversity, landscape, historic environment, water and pollution; at worst, the relevant SA scores should be neutral (not negative).</p> <p>The SA should recognise the positive contribution which the site can make towards an access solution at the Townsend Way/Worcester Road roundabout.</p>	<p>Noted</p> <p>Noted. The SA found very positive effects for the proposed site with regard to SA objectives for travel & transport.</p>

Section of SA Report	Consultee Comments/Responses	Enfusion Comments
5204, 5226, 5223 Hallam Land Management (Agent: David Lock Associates)		
	<p>The representation proposes the inclusion of land immediately to the south and south west of Evesham Town centre within the South Worcestershire Development Plan. Comprising 29 hectares of land adjacent to the town centre the representation suggests the site has a capacity for a minimum 400 dwellings. The representation is supported by additional technical work including a Habitats Regulations Assessment and Sustainability Appraisal. The site has only recently (Autumn 2011) become available as a development location.</p>	<p>A Sustainability Appraisal was undertaken for the Preferred Options document that looks at the Evesham Allocations Urban Capacity sites. The SA found that these sites were generally beneficial for sustainability, with some uncertainties in relation to site specific detail.</p> <p>The additional site being proposed in this representation will have similar effects, although it is noted that a proposed 400 homes may have localised impacts on traffic. The consideration of this site (including the SA put forward by the site's proponent) has been considered in updating the SA for the Evesham sites.</p>
House Builders Federation		
	<p>SWDP 20 Tenbury Wells & Allocations. We fail to see how a Sustainability Appraisal that assesses the economic and social needs of the town, as much as any environmental considerations, could conclude that just 30 new homes in 20 years will be adequate to address the town's housing requirements.</p>	<p>Noted.</p> <p>This is a matter for the plan-making.</p>

Section of SA Report	Consultee Comments/Responses	Enfusion Comments
2295 Hunter Page on behalf of the Holly Green Residents		
	<p>SWDP 21 Upton upon Severn. Supports SA findings in respect of economy, communities and housing.</p> <p>Suggests that potential effects with regard to travel & transport, landscape SA objectives should be minor negative (rather than unknown).</p> <p>Suggests that potential effects with regard to biodiversity & historic environment SA objectives should be minor negative (rather than neutral).</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
3235 Marsten Developments Ltd (Bell Cornwell)		
	<p>SWDP 20 Tenbury Wells. It cannot be credible that the Sustainability Appraisal concludes that just 30 dwellings over at least 22 years is adequate to properly address the town's housing requirements.</p>	<p>Noted.</p> <p>This is a matter for the plan-making.</p>
2341 QintiQ (GVA)		
	<p>SWDP1 & Throckmorton Airfield site: The Sustainability Appraisal incorrectly assesses it as a 200 dwelling development and a "proposed eco-town site".</p>	<p>Noted and corrected.</p>
1118 Welbeck Strategic Land (Star Planning)		
	<p>SWDP50 Implementation, Phasing and Monitoring/CIL. It is noticeable, by omission, that this policy is not the subject of consideration in the SA.</p>	<p>Noted and addressed in the updating of the SA.</p>

Responses to Sustainability Appraisal of Targeted Changes to the Preferred Options of the South Worcestershire Development Plan Targeted Changes (6 August – 14 September 2012)

Section of SA Report	Consultee Comments/Responses	Enfusion Comments
632 Throup, 928 Knibbs, 1433 Taylor		
	<p>SOC111 proposal to include housing at Powick is not justified and unsustainable; the impact of the landscape would be unacceptable and could not be mitigated.</p> <p>The Sustainability Appraisal is of little value – for the Preferred Options document, it does not examine in any detail the consequences; for the Significant Changes document it does not even mention the new allocation in Powick.</p>	<p>Noted. This is a matter for the SHLAA and plan-making. The SA incorporates strategic level assessment appropriate to this level of plan-making. The SA of the Preferred Options (2011) recognised that development design and construction will need to ensure that impacts on existing residents are minimised through contributions to infrastructure and facilities improvements as appropriate. The SA concluded that there were minor positive effects on objectives for communities and no key negative effects for Powick and Collett's Green villages in Malvern Hills.</p>

Section of SA Report	Consultee Comments/Responses	Enfusion Comments
1427 and 2150 David Lock Associates on behalf of Hallam Land Management Ltd		
	SOC052 new land at Abbey Road, Evesham. The Sustainability Appraisal and Habitats Regulations Update, prepared by the Authorities and which reflects the proposed Significant Changes to the Preferred Options, likewise concur that the site's inclusion in the SWDP will be beneficial in terms of sustainability.	Noted.
1440 RPS on behalf of David Eaton		
	SOC091 land west of Elmley Road, Ashton Under Hill The SA should address the comparative merits of different options. It is considered that increasing the scale of the allocation from about 12 to 25 dwellings would not be significant in the context of the Plan and the level of development proposed in Category 2 villages where the increase across all Category 2 villages would increase from 85 to 98 dwellings.	Noted.
3002 Pegasus Planning Group on behalf of Consolidated Rank Properties Ltd		
	SOC0012 SWDP2 Table 4 The SA and HRA (July 2012) state that the increase in new homes from 20,360 to 23,200 will mostly be met through bringing back empty homes into use and windfall sites. The change to Table 4 states that the number of empty dwellings coming back into use is 550 dwellings over the plan period. It is not clear what the justification is...	Noted. This is a matter for the evidence base for the plan-making.
2530 2532 2535 and 2537 RPS on behalf of Gleeson Strategic Land Ltd		

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		Land and housing allocations at Malvern. It is important that the strategic role of Malvern Town is recognised at the principal location where the SWDP housing growth currently envisaged for the WWA be concentrated. The SWDP Preferred Option categorises Malvern as a second tier town underneath Worcester, along with Evesham and Droitwich. Housing allocations are proposed reflecting the findings of the Sustainability Appraisal.	Noted. Review of housing figures is a matter for the plan-making.
3277 Seymour, 3278 Stevenson, 3279 Barnett, 3265 Downing, 3280 Griffiths, 3281 Folzy, 3282 Jessa, 3283 Desson, 3285 Walters, 3291 Heath, 3292 Sanders			
		Potential Development site in Bishampton (11-08) - the Sustainability Appraisal accompanying the changes document states the following — ‘Additional small sites in Bishampton, Cleeve Prior, Conderton, Defford and Pebworth are all well-located in relation to the villages they are located in, will contribute to meeting local housing needs and are unlikely to have any significant adverse effects. There may be some localised effects on townscape/landscape which will need to be considered/mitigated for at the detailed planning stage”. We do not consider the Bishampton site to be well located due to its backland nature. We also consider that the environmental and historic impacts should be fully considered now.	Noted.