

Location in report/topic/theme	Comment received	Lepus action or response	Green boxes indicate comment actioned accordingly with no issues	Yellow indicates no change made with text to explain
Comments from Alex Thompson at Environment Agency rec 03.07.18				
Environmental Themes	The themes presented appear to incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive and appear reasonable to reflect the purpose of the local plan review and its potential environmental effects. The themes include Biodiversity, Climate change (incorporating mitigation and adaptation), Natural resources (land, soil and water). The following comments focus on these themes relevant to our remit.	None.		
Biodiversity	We assume that you have consulted Natural England (NE) for comments and as the lead on SSSI/SAC areas, within Worcestershire, they will offer you some advice on the options to protect and enhance such designations etc. The SEA objectives and questions for biodiversity cover the water environment and priority species relevant to our remit (with reference to the EA/NE joint protocol on protected species) and these appear reasonable to help ensure protection and enhancement of such.	None.		
Climate Change	<p>The climate change adaptation section should be amended to include some further references to more recent guidance. The National Planning Practice Guidance (NPPG) refers to Environment Agency guidance on considering climate change in planning decisions which is available online: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</p> <p>This has been updated and replaces the September 2013 guidance. It should be used to help planners, developers and advisors implement the National Planning Policy Framework (NPPF)'s policies and practice guidance on flood risk. It will help inform Flood Risk Assessments (FRA's) for planning applications, local plans, neighbourhood plans and other projects.</p> <p>We have produced Climate Change Guidance for our local area. This is attached for your consideration / reference.</p>	We have included references to this latest guidance in para 6.1.1		
Fluvial risk	<p>For fluvial risk, it should be noted that there is a need to include a different climate change allowances for climate change (peak river flows) to inform the location, impacts and design of a scheme depending on development vulnerability. For example, residential development allocations and proposals will need to consider a 35% and 70% increase for peak river flows, on top of the 1 in 100 year flood level.</p> <p>We note that the SEA doesn't identify the process of sequential testing. The sequential approach/NPPG policy, aims are to avoid inappropriate development in areas subject to flood risk (applications granted in flood risk areas). The above climate change increases are likely to impact upon this. We would recommend that you include putting development in Flood Zone 1 as an objective.</p> <p>We would recommend that you directly comment on the sequential approach within the Climate Change section (6) of the report.</p> <p>The SA could also look at 'ensuring flood risk reduction/improvement to the flood regime'. For example, options to look at strategic flood risk management and reduction measures could be incorporated, for example flood storage improvements, which can often be linked to other wider environmental benefits such as wet washland provision, or biodiversity enhancement, if planned. Alternatively options to look at flood alleviation scheme improvements could be explored.</p> <p>In considering other types of flooding a reference should be made to surface water flooding maps.</p>	<p>Climate change allowances for flood risk are referred to in para 6.2.13 and 6.2.14.</p> <p>Sequential flood risk assessments and exceptions tests now included in para 6.2.11</p> <p>Surface water flooding is referred to throughout the flood section, including figure 6.6. which maps surface water flood risk in the SWDP area</p>		

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Soil (Land) and Water Resources	<p>Within the Natural resources section of the report, there is reference to groundwater vulnerability, source protection zones (SPZs).</p> <p>Groundwater Vulnerability is an important consideration in Worcester and further information is available in our CAMS documents.</p> <p>In considering groundwater vulnerability, we would recommend that reference be made to our Groundwater Protection Position Statements, February 2018 Version 1.2.</p>	<p>Included reference to EA's guidance for managing groundwater in para 12.2.13</p>		
Soil (Land) and Water Resources	<p>The Environment Agency is a consultee for several types of planning application related to our statutory duties on flood risk; protection of land and water quality and waste regulation. This is an important mechanism for improving the hydromorphological condition of water bodies and regulating development which has the potential to cause deterioration of a water body. Local Authorities and developers can play a significant role in improving the local water environment, for example through Local Plan policies, urban regeneration or catchment restoration and green infrastructure projects. Typical improvements might include:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Restoring rivers and floodplains or corridors to a more natural state; <input checked="" type="checkbox"/> Removing barriers to fish movement; <input checked="" type="checkbox"/> Promoting efficient and sustainable use of water resources in developments; <input checked="" type="checkbox"/> Promoting the use of Sustainable Drainage Systems (SuDS); <input checked="" type="checkbox"/> De-culverting watercourses; <input checked="" type="checkbox"/> Managing pollution from wastewater 	<p>Added para 12.2.16 and list of bullet points to incorporate this.</p>		
Soil (Land) and Water Resources	<p>We support the SEA objective and questions which seek to 'protect and enhance water quality and the condition of water resources'.</p> <p>Future development should help to facilitate the restoration of watercourses, such as deculverting of any watercourse within or on the boundary of a site, naturalising artificially engineered river bank or beds, and providing an adequate riparian corridor in meeting flood risk, linked to RBMP and WFD objectives.</p> <p>The objective could include an indicator on water quality levels within the County's main watercourses. This could be linked to the status and/or potential of waterbodies under WFD objectives. This would link to the context of seeking to improve failing waterbodies through appropriate mechanisms such as Sustainable Drainage Systems (SuDS) and improvements to watercourses (including new watercourses, or opening up of culverted systems).</p>	<p>Included the indicator "• Water quality of county's main watercourses;" for SA Objective 6 Natural Resources</p>		
General comments	<p>Page 101, 12.2.9 – This section currently refers to 'Catchment Area Management Strategies' etc...This should be updated and include Avon CAMs.</p>	<p>We have included Warwickshire Avon CAMS alongside the Teme and Severn CAMS</p>		
General comments	<p>Page 42 – 6.1.3, this section could be updated to describe/identify the sequential approach as identified in the NPPF, paragraph 100.</p>	<p>Sequential approach has been included into para 6.2.11</p>		
General comments	<p>Page 100 - regard to managing waste water and water resources, a revised Water Cycle Study (evidence base) will need to be undertaken to inform the plan and SEA objectives (we are aware as review of the WCS is been undertaken). This will inform wastewater infrastructure delivery and requirements, water resources and water efficiency requirements linked to more stringent 'optional' water efficiency targets where justified.</p>	<p>included reference to a revised water cycle study in para 12.2.3</p>		

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Context & Baseline Information	<p>The report should identify the built environment and its character and distinctiveness and refer to the historic environment. There is the potential for undesignated assets and archaeology on some sites, and these should be referred to within the baseline information. We advise that the contextual information is developed in this respect. Baseline information should describe the current and future state of the historic environment, providing the basis for identifying sustainability issues, predicting and monitoring effects and alternative ways of dealing with them. It can use both quantitative and qualitative information and should be kept up to date. It is important that meaningful conclusions can be drawn from the baseline information; what it means for the Plan and how the historic environment is to be dealt with.</p> <p>The baseline information in the scoping report on the historic environment should include all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged. This not only involves undesignated (or local heritage assets) but the potential for unrecorded archaeology, and historic landscape character areas for example.</p> <p>The NPPF recognises the importance of undesignated heritage assets and therefore this should be included within the baseline data. The source of this information should be included within the scoping report; references made to them and recognise the opportunities for their enhancement and contribution to other aspects of the Plan area. The importance of local character and identity including the landscape and townscape of an area is an important consideration. The scoping report should recognise the importance of this and the source of this information should be included within the scoping report, with reference made to them in key issues and opportunities.</p>	Elaborated on non-designated heritage assets, see paras 9.2.10, 9.2.11 and 9.2.12. Added reference to Historic Land Characterisation.		
section 9.2	accurate but too general to draw meaningful conclusions from with respect to how the historic environment should be positively managed in line with the NPPF. We advise that this section is developed in line with our comments above.	Elaborated on non-designated heritage assets, see paras 9.2.10, 9.2.11 and 9.2.12. Added reference to Historic Land Characterisation.		
Relevant Plans, Programmes and Policies	<p>We welcome the reference made to a number of our advice documents, and advise that the following are additional added for consideration as part of the Plan development;</p> <ul style="list-style-type: none"> • The Historic Environment and Site Allocations in Local Plans: http://historicengland.org.uk/images-books/publications/historic-environment- and-site-allocations-in-local-plans/ • Sustainability Appraisal and Strategic Environmental Assessment: http://historicengland.org.uk/images-books/publications/sustainability-appraisal- and-strategic-environmental-assessment-advice-note-8/ 	Added both advice documents to the PPPs		
SEA Themes and Objectives	It is important that the role the historic environment plays in sustainable development and the contribution it makes to delivering social, cultural, economic and environmental benefits is recognised. The historic environment underpins sustainable development and therefore, it may warrant including in other objectives including the need for specific reference to landscape character.	No actions needed		
table 13.1	The dedicated SA objective relating to the historic environment in table 13.1 is welcome. We advise reference to the setting of heritage assets to be included in this objective, to bring it in line with the NPPF (e.g. paragraph 132).	Specific reference to the conservation and enhancement of the setting of heritage assets added to the Objective		

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SA Framework (B2)	With respect to the SA Framework (B2), we also advise that clear reference is made to setting, as above. You may also wish to add reference to the character of the conservation area in the final bulletpoint as not all conservation areas have management plans, and your conservation officer can advise you on whether a proposal would harm, conserve or enhance the character of the designated area. Reference should also be made to undesignated heritage assets in this section.	Specific reference now made to the setting of heritage assets in the decision making criteria for the cultural heritage objective. Included reference to the character of Conservation Areas in indicators.		
Site Allocations	Historic England has produced an advice note – Site Allocations and the Historic Environment in Local Plans http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ which may be of help in the production of your Local Plan and in assessing the impact of sites on the historic environment. This document is intended to offer advice to all those involved in the process, to help ensure that the historic environment plays a positive role in allocating sites for development. It offers advice on evidence gathering and site allocation policies, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.	This document has been added to the PPPs.		
Comments from Steve Bloomfield at Worcestershire Wildlife Trust 25.06.18				
We are generally supportive of the proposed approach and believe that for the most part the scoping report sets out the right topics and information to be considered in relation to the SWDPR. We make specific comments on the 'Biodiversity' section below but more broadly we are pleased to see that potential impacts on biodiversity and green infrastructure are considered under other topic headings as well. This approach is essential if the SWDPR is to be appropriately informed by likely effects and will be important in generating a plan that can deliver genuinely sustainable developments.		No action needed.		
Biodiversity	With that in mind we would recommend that a separate section headed 'Green Infrastructure' be included so as to capture the overarching nature of the subject. Whilst elements of GI are picked up under many of the extant sections there would be significant merit in considering the subject as a whole somewhere within the SA process, especially in terms of potential impacts on severance of extant GI corridors (wildlife and sustainable transport for example) and opportunities to enhance the GI network. Reference to the county-wide GI Strategy and Framework Documents would be helpful in this regard. Recognising that GI is not covered explicitly in the SEA Directive topic list we accept that it may not be possible to add a specific section. That being the case we would strongly recommend that a GI element be included in each of the 'Key Sustainability Issues' boxes to take into account the likely implications on the GI network as a whole.	Section that focuses solely on GI added, see 5.2.15		
Section 5 Biodiversity and Geodiversity	We recommend that you make specific reference to Local Wildlife Sites in the commentary in section 5.1. Whilst these sites do not benefit from statutory designation they make an important contribution to the area GI network and are, at a landscape scale, likely to be among the most important biodiversity features considered by the SWDP. Emphasising their value here would help to ensure an appropriate level of consideration in the SWDPR in line with the approach set out by the government white paper and other guidance.	Section on Local Wildlife Sites is there in para 5.2.11 and Figure 5.5		

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Baseline Data. Section 5.2	Section 5.2 generally appears to cover the relevant areas of information to an appropriate degree. We would however recommend that reference be made to the S41 list of habitats and species of principle importance that flows from the NERC Act 2006. This list fits well with the commentary under section 5.2.12 but gives the relevant habitats and species rather more weight than the paragraph currently implies.	Added the need for careful consideration of potential impacts on S41 species and habitats from the NERC act in para 5.2.13		
Key sustainability issues. Table 5.3	Table 5.3. covers most of the relevant issues from relevant PPP but we would strongly contend that it should also include consideration of Local Wildlife Sites. These sites are fundamental to biodiversity conservation in the county and form key nodes in the GI network. Their limited protection comes only from the planning system and so the SWDP is an essential tool in securing them for the future. Moreover, restricting consideration to the statutory sites would be very likely to lead to significant weaknesses in the SA findings and potentially flaws in the SWDPR including poorly sited development allocations and potentially policy weakness.	Added the importance of the SWDP review for protecting LWSs into Box 5.3 as a Key Issue		
	In addition we would suggest that habitat and ecological network fragmentation is also a key consideration that needs to be captured in the SWDPR. Development decisions can play a significant role in delivering 'bigger, better and more joined up' habitats as advocated by the Lawton Review but poorly sited development can sever important biodiversity (and broader GI) corridors, with significant deleterious effects, unless careful consideration is given to site allocation and on-plot land-use parameters.	Added the importance of the SWDP review for protecting the habitat and ecological network, and avoiding fragmentation as per the Lawton Review, as a Key Issue in Box 5.3		
Box 5.4	We agree with the commentary presented in Box 5.4 and so we are fully supportive of updating the SWDP and the use of the proposed SA to develop positive outcomes for biodiversity.	no action needed.		
Comments from Gillian Driver at Natural England rec 03.07.18				
Box 5.3: Key Biodiversity and Geodiversity Issues for South Worcestershire	We note that paragraphs refer to protection of Natura 2000 sites and national asset, but would advise including avoiding damage, restoration and/or enhancement of protected sites in line with the National Planning Policy Framework. The point "Enhancement of river ecology such as higher river quality watercourses" should be reworded as it is not clear what is meant by this. We would advise that there should be a point for the enhancement of water quality in watercourses. We advise including a paragraph for the protection, enhancement and creation of wildlife corridors and connectivity between habitats.	We have included both these points as Key Issues in Box 5.3. They tie in well with comments from the wildlife trust.		
Box 11.3: Key Landscape and Townscape Issues for South Worcestershire	We recommend that the paragraph "Development should seek to be in accordance with the Malvern Hills AONB and Cotswolds AONB management plans", should include contributing towards their aims.	Added 'and contribute towards their aims' to the Key Issue		
Box 12.3: Key Natural Resources Issues for South Worcestershire	We note that there is no specific reference to the loss of Best and Most Versatile agricultural land..	Included specific reference to BMV as a Key Issue in Box 12.3		
SA Objectives	3.Biodiversity and Geodiversity: Protect, enhance and manage the flora, fauna, biodiversity and geodiversity assets of SW. The objective should include creating biodiversity and geodiversity assets and delivering net gain for biodiversity.	Added net gain to objective and included 'creation of new biodiversity or geodiversity assets' as an indicator		
Comments from James Dinn – Archaeologist at Worcester City Council, rec 09.07.18				
	the best term is assets not resources	Replaced resources with assets in each case in 9.1.1		

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9.1.1	should mention local lists	local lists added in 9.2.9 - 9.2.12		
	while there is certainly potential value in undesignated assets (esp archaeology), and it is right to mention it, there is also an actual recognised value in many undesignated assets	added 'and actual value'		
	it would be a good idea to add wording about how heritage assets are irreplaceable, and on the benefits of heritage conservation for eg placemaking and quality of life	added to the first sentence: "particularly in relation to the conservation and enhancement of heritage assets that are irreplaceable and play an important role in place making and the quality of life for local residents. "		
9.2.1	the term used now is scheduled monument not scheduled ancient monument	Amended		
	'conditions imposed' sounds both bureaucratic and onerous	No change made - 'conditions imposed' is wording taken directly from the NPPF.		
	the registered historic battlefields are not mentioned at all, here or elsewhere (there are 2 in S Worcestershire)	battlefields now discussed in para 9.2.13		
9.2.2	would be helpful to add a comment on grading of LBs, and mention II* - listed buildings make up by far the highest proportion of designated heritage, and it would be good if this was reflected in the level of treatment given here.	Added detail on the grading of LBs and the proportion of each in para 9.2.2		
9.2.3	this is quite detailed, which is fair enough, but if this is the approach it should be applied to all types of designated asset	No change required		
9.2.4	list is given rather than quantification, which may be unnecessary, but if it is done, is should be complete (Ombersley Court omitted)	Amended		
	the parkland is the RPG, not Croome Court itself	Amended		
9.2.5	scheduled monument, as above	Amended		
	for consistency, give some examples	Added two examples.		
9.2.6	listing is not based on 'national importance' but 'special interest'	Amended		
9.2.7	the Riverside CA is not really about the centre of Worcester (though it does contain part of the city centre) and the description is misleading	Amended		
9.2.8	HE have published an HAR register since 1998	Amended		
	battlefields again	Amended		
	the HAR register does include, not considered to include	Amended		
9.2.9	assets would be a better heading	Amended		
	local list again	Amended		
	there certainly are unrecorded archaeological artefacts in South Worcestershire, no maybe!	Amended		
9.2.10	the ADS Archsearch is not a reliable record for estimating the extent of 'physical archaeological evidence' and the SWDP area is well covered by the Worcester and Worcestershire Historic Environment Records, which are not mentioned here at all, and which are also available via Heritage Gateway. Use of a reliable data source will allow the asset base to be monitored over time whereas the number given does not form a baseline for future comparison. HERs are of course referenced in NPPF.	Added references to the Historic Environment records kept by Worcester city and Worcestershire county councils, in para 9.2.10		
	hopefully most 'digs and excavations' resulted in archaeological finds!	No change needed		

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9.3.1 – box 9.3	the sustainability issues list doesn't go far enough – it should start to identify the framework for dealing with these issues, ie through policy, understanding of implications (including site investigations), and site allocations	No change made. The Key Issues box cannot be entirely comprehensive, the aim is to provide an overview of the likely key issues the SWDP and SA will need to deal with in relation to the Cultural heritage objective. We do not develop frameworks for how to deal with the Key Issues in the Key Issues box, see Key Issues boxes for other topics in the report as this approach is consistent throughout.		
	not convinced the facts bear out the comment about HAR (unless there is some comparative work on levels of HAR in other, preferably similar areas	The HAR Key Issue has been merged with the third Key Issue i.e. that protecting heritage assets is essential, those on the heritage at risks record are the most urgent		
9.3.2 – box 9.4	this seems to reflect not terribly deep thinking, esp on the implications of not having a current plan and policies to support implementation of national policy, and appropriate site allocation	No change needed		
	HAR – I don't know the answer to this either but suggest that economic prosperity and appropriate uses for assets are the most important factors in keeping assets off the register or getting them repaired and removed from the register	No change needed		
	investigation related to proposed development is one of the main ways in which heritage assets are newly identified	No change needed		
Comments from Emily Barker – Planning Services Manager, rec 12.07.18				
Acronyms	Note it is the Office for National Statistics	Amended		
1.2.1	The population figure appears outdated. Latest available ONS data for 2017 states there are a total of 304,857 people within the three districts. Whichever figure is accepted, the Scoping Report should be consistent in its sections, as it refers to a figure of 301,600 in paragraph 8.2.1.	Amended		
1.2.3	Including the SAC within this paragraph is not appropriate. The SAC is not a landscape designation, and it falls wholly within the Cotswolds AONB, so would be 'double counted' anyway.	Amended		
1.4.4	This states that "The present statutory requirement for SA resides in The Town and Country Planning (Local Planning) (England) Regulations 2012". While they do set legal requirements, the Regulations are more to do with procedure. The "statutory requirement" is strongest under s19(5) of the PCPA (as mentioned in the preceding sentence).	Amended		
1.4.4	In the final sentence of this paragraph, the description of SA appears to apply more to SEA, as it talks exclusively of environmental issues.	Amended		
2.3.1	Unsure that the final sentence makes grammatical sense. Suggest "informed by" instead of "informative"	replaced informative with 'indicative'		
3.1.2	Final sentence: note that improving air quality can also benefit human health.	Amended		
3.2.10	Final sentence: note there are frequent direct services to London from both Worcester Shrub Hill and Worcester Foregate Street Stations.	Amended		
3.2.11	Worcestershire Parkway station is near junction 7, not junction 5.	Amended		
3.2.15	Clarification is required in the final sentence. "Cyclists are at a higher risk" of ... what?	accidents. Amended		
4.1.1	Reference is made to "the 1996 EC Directive", but there is no footnote or explanation with the full name.	Amended		

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Box 4.3:	The final bullet point mixes issues (e.g. health and wellbeing) with policy tools (AQMA).	Separated these points.		
5.2.12	Note the NPPF is policy, not legislation.	Amended		
5.2.13	The Severn and Avon Vales is missing from the bullet point list	Amended		
5.2.14	The words "contradict planning law" should be changed to "fail to comply with planning law or policy"	Amended		
6.1.2	Reference to the Climate Change Act duplicates 6.1.1.	Amended		
6.2.1	This paragraph states that "Typically, development leads to an increase in GHG emissions in the local area unless specific efforts are made to help reduce GHG emissions and increase the use of sustainably sourced materials and energy". This may be misleading as, whilst the successful implementation of these measures is likely to <i>minimise</i> any increase, it is nevertheless still likely that a net absolute increase will occur. This assertion is continued in 6.2.2, which suggests that overall emissions will not rise. This may be the case if measured on a per capita basis, but in absolute terms an increase (even if as small as reasonably possible) still remains an increase. We are talking here about damage limitation, rather than stopping the damage outright.	Amended accordingly to emphasise the efforts are needed to help limit GHG emissions increase as much as possible		
6.2.12	An actual definition of groundwater/groundwater flooding should be included here first. It should then go on to say that higher groundwater levels may mean that sewers are unable to function efficiently. As an example, if the water table rises above the level at which a sewer has been laid, water may seep into the sewer through joints and manholes, reducing its capacity to carry its normal load. This can lead to an increased risk of sewer flooding.	Included definition and given the cited flooding example.		
6.2.13	Should read 'surface water risk' not 'surface flood risk'.	Amended		
6.2.14	This states that "It is good practice to make allowances for climate change in flood risk assessment." This sentence could be made stronger, as it is essential that allowances for climate change are made.	We have now elaborated further on climate change allowances in the report, as per comments from the EA		
Table 6.4	Note that the weblink in footnote 35 does not work.	Amended		
Table 6.4	The population figure for Wychavon appears to be wrong.	Amended		
7 Economic factors	There is nothing here regarding 'digital connectivity', e.g. availability of superfast and full fibre broadband, mobile connectivity, etc. This could be picked up in Section 7 or 8 as a benefit to the local economy or to health and quality of life, but also has the potential to benefit/impact a variety of areas. It may be that such issues are intended to be covered under 'strategic infrastructure', but we would be concerned that without specific reference, digital connectivity may be overlooked.	We have included a section on Digital Connectivity in Chapter 7		
8.2.14	Question whether the word "microbiomes" is sufficiently well-understood by a general readership	We expect it is - no change made.		
9.2.1	Note we have recently been advised by historic environment consultees to avoid the "Ancient" in "Scheduled Ancient Monuments". They should apparently be referred to as simply "Scheduled Monuments".	Amended		
9.2.7	This refers to the largest conservation areas including "the Malvern Hills". This is potentially misleading, as it suggests the hills themselves are covered. The conservation area covering the town centre is called the "Great Malvern conservation area".	Amended		
Box 10.3	The final bullet point refers to the needs of other authorities, but this appears without any introduction, as it is not discussed in the preceding text. Some detail on what this involves (scale of need/any cross-boundary agreements in place/commentary on likely locations) would be helpful to back up this point.	Amended		

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11.2.3	Rather than saying there are 22 landscape character types "identified and described by Worcestershire County Council", it should say "...identified and described in the Worcestershire Landscape Character Assessment".	We have made this requested amendment. Why this amendment has been requested is unclear - the LCA was prepared by WCC and the statement is factually correct.		
11.2.6	States that "South Worcestershire coincides with the Malvern Hills and Cotswolds Areas of Outstanding Natural Beauty". This may be slightly misleading, as it suggests the respective boundaries are contiguous. It may be better to say "South Worcestershire includes parts of the Malvern Hills and Cotswolds Areas of Outstanding Natural Beauty".	Requred to 'partially cocincides with' - also backed up by Figure 11.3		
Box 11.3	This focuses mainly on the AONBs. Whilst important, they cover only a relatively small part of the plan area. Some broader issues, including those relating to townscape, could be drawn out.	We consider the AONBs to be the primary concern for potential landscape impacts. We have added the potential impacts on distinctive townscapes.		
Box 11.4	Third bullet point: "potential" should be "potentially" and "Plan led" should be hyphenated.	Amended.		
Box 11.4	Fourth bullet point: can "discord" be used as a verb in this way? Also check punctuation.	Yes it can be used in this way - it neede the word 'with' added after, which has been done. Punctuation amended.		
12.2.12	This paragraph seems to come from nowhere, and would possibly relate better to the section on water quality that follows.	Amended		
Appendix B: SA Framework	In the decision-making criteria for objective 3, concern over the word "hotspot", the meaning of which is unclear. Suggest re-wording as follows: "Protect and enhance biodiversity" and "Protect and enhance geodiversity", in line with national policy, including NPPF paragraph 109.	Amended		
In SA objective 4,	In SA objective 4, it would be better to "protect and enhance" rather than "protect or enhance".	Amended		
In SA objective 4,	may be easier if all of the decision-making criteria questions were designed so that a 'yes' or a 'no' gave a consistent message in terms of whether this would be a positive or negative sustainability effect. For example, the criteria in SA Objective 1 are "Will the option/proposal increase energy consumption or GHG emissions?" and "Will the option/proposal generate or support renewable energy?". If both answers are 'yes', the first would have negative implications for sustainability, whereas the second would be positive.	We disagree that this is a necessary idea and this has not been actioned. The indicators are useful for the SA/SEA expert carrying out the assessments during the SA/SEA appraisals - in practice, the propsoed approach would not benefit this process any more than the current indicators listed.		
SA objective 7	SA objective 7: should the first of the criteria say "Ensure that residents will have the opportunity to live in a home which meets their needs?"	Amended		
SA objective 6	SA objective 6 could include reference to the need to safeguard mineral resources to enable sustainable development. If minerals are sterilised by other development, this could lead to insufficient materials being available to enable development, or minerals will need to be brought into south Worcestershire from elsewhere, increasing transport emissions. "Mineral Safeguarding Sites" are referred to in the list of indicators alongside this objective, but are not part of the decision-making criteria. Note also that the relevant term in the NPPF and Minerals Local Plan is "Minerals Consultation Areas".	The decision making criteria list is not exhaustive. As the MSS/MCS is there as an indicator, they will be considered appropriately during the SA/SEA appraisal process and they don't need to be their own decision making criteria. We have reworded the indicator to 'Impacts on Mineral Safeguarding Sites and Mineral Consultation Areas'		
Appendix B: SA Framework	The term "district" is used in the singular a couple of times within the framework (the first of the decision-making criteria under objective 11, and one of the indicators under objective 8). It would be better to refer to "districts" plural, or to "the plan area", or "south Worcestershire".	Amended		
Appendix C: Plan, Policy and Programme Review	Semicolons should not be used to introduce quotations (e.g. page C3, centre column on Biodiversity 2020).	Amended the cited misplaced semi-colon.		

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	Page C7: The discussion of the main objectives and environmental/socio-economic requirements of the UK National Ecosystem Assessment (2011) would be more useful if it reported the key findings at the end of the process rather than the questions with which the assessment began	<p>Through the combination of the overview of PPPs and baseline data as well as key issues in the main body of the report, in addition to the full name and reference next to the objectives of each of the PPPs, we think the Scoping report provides a good and thorough indication of the relevance of existing PPPs and what the SWPD Review should be in accordance with, in a way which satisfies the SEA Directive. The review of PPPs is required in the SEA Directive, as per Annex I (a):</p> <p><i>"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;"</i></p> <p>Note the word 'outline' here. We would also note that it is not possible to be entirely comprehensive or exhaustive in the PPP review in terms of what each PPP is saying and how the SWDP Review will need to respond, particularly as it is important to avoid a PPP review which is excessively long to the extent that it is unwieldy and difficult to follow.</p>		
	Some of the implications for the SWDPR and SA should be more specific. As examples, the implications for the SWDPR and SA of the Housing Assessment and Economic Assessment are, respectively, "The SWDPR and SA should consider the outcomes of the Housing Assessment" and "The SWDPR and SA should consider the outcomes of the Economic Assessment". These statements add no value and do not explain the relevance of the documents or the key issues emerging from them that should be reflected in the SWDPR or SA.			
	It would be useful for the plan, policy and programme review to include the Worcestershire Waste Core Strategy and the Worcestershire Minerals Local Plan. Both documents are part of the development plan and set a framework for guiding minerals and waste developments within south Worcestershire.	Included both in the PPPs for Material Assets		
Typos	3.2.8 "pf" in final sentence.	Amended		
	3.2.18 Final sentence: "travelling" should be "travel".	Amended		
	3.2.19 In second sentence "being" should be "are".	Amended		
	3.2.19 In third sentence, should be "districts".	Amended		
	4.2.1 It should be "Newtown Road".	Amended		
	4.2.2 "AQMAA".	Amended		
	4.2.8 Should be "Malvern Hills where" rather than "Malvern Hills were".	Amended		
	5.2.11 "throughout" and "Severn".	Amended		
	5.2.13 "Feckenham"	Amended		
	5.2.20 In final sentence: "showing"	Amended		

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	6.2.8 Second sentence should say "has higher" rather than "has a higher". Box 6.3 In the second bullet point, "has" should be "have". The final bullet point, should refer to "these issues" or "this issue".	Amended		
	Box 7.3 In the third bullet point, should "NVC" be "NVQ"?	Amended		
	Box 7.4 In the first bullet point, "to" should be "will".	Amended		
	7.2.2 "ageing".	Amended		
	8.2.2 "residents".	Amended		
	8.2.6 "tends".	Amended		
	8.2.10 "2015".	Amended		
	8.2.12 Second sentence "hospitals" plural.	Amended		
	8.2.16 Second sentence "its".	Amended		
	8.2.18 Third sentence "and few" should be "are few".	Amended		
	Box 8.4: First bullet "are expected" should be "is expected"	Amended		
	Fourth bullet "remain poor" should be "remains poor".	Amended		
	Fifth bullet "number of homelessness" should be either "number of homeless" or "level of homelessness"	Amended		
	9.2.7 "known at" should be "known as".	Amended		
	10.2.6 "district" should be "districts" plural.	Amended		
	Table 11.1: Note typo on "principal" throughout this table. Also a spurious "ß" in "Principle Settled Farmlands".	Amended		
	11.2.4 First word "There" should be "The".	Amended		
	12.2.5 "lease valuable" should be "least valuable".	Amended		
	12.2.7 "state" should be "states".	Amended		
Other minor issues	Table 3.2: Comma position in the 2014 M5 number is incorrect. 4.2.6 Second sentence seems to be missing some words. Box 4.4: Delete "are" from first bullet point.	Amended		
	5.2.3 Final sentence is unfinished.	Amended		
	Box 5.4: Missing word in second bullet "location that could"	Amended		
	7.2.5 Delete second "of".	Amended		
	10.2.3 Check grammar of second sentence.	Amended		
	Box 11.4 and 12.4: "Plan led" should be hyphenated.	Amended		
	Semicolons are used incorrectly (at 3.1.5, 3.2.8, 3.2.17, 3.2.19, 5.2.19).	Amended incorrect uses of the semi-colon		
	The resolution of the maps needs to be higher throughout, as it is currently difficult to see the detail.	It would be useful for some specifics about which maps are lacking the required detail. Our maps are intended to provide a strategic overview of the distribution of assets and constraints in the Plan area - they are not intended as a tool for detailed appraisal. Given the size of the Plan area, the scale of each map needs to be quite large (i.e. zoomed out). The only way around this would be to spread maps across multiple pages, which we consider to be unnecessary given that our maps are meant to be a strategic overview and not a detailed assessment tool (at this Scoping stage).		