

Strategic Environmental Assessment of the Broadway Neighbourhood Development Plan

Volume 1 of 2: Environmental Report

May 2021



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Strategic Environmental Assessment of the Broadway Neighbourhood Plan

Volume 1 of 2: Environmental Report

LC-679	Document Control Box
Client	Broadway Parish Council / Wychavon District Council
Report Title	Strategic Environmental Assessment of the Broadway Neighbourhood Plan
Status	Final
Filename	<u>LC-679_Vol_1of2_Broadway_NDP_SEA_Report_7_260521KD.docx</u>
Date	May 2021
Author	KD
Checked	LB
Approved	ND

Front photo: Broadway High Street by Kara Davies.

About this report & notes for readers

Lepus Consulting Ltd (Lepus) has prepared this draft report for the use of Broadway Parish Council and Wychavon District Council. There are a number of limitations, which should be borne in mind when considering the results and conclusions of this report. No party should alter or change this report whatsoever without written permission from Lepus.

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SEA is a tool for predicting potential significant effects. The actual effects may be different from those identified. Prediction of effects is made using an evidence-based approach and incorporates a judgement.

The assessments above are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. No attempt to verify these secondary data sources has been made and they have been assumed to be accurate as published.

Every attempt has been made to predict effects as accurately as possible using the available information. Many effects will depend on the size and location of development, building design and construction, proximity

to sensitive receptors such as wildlife sites, conservation areas, flood risk areas and watercourses, and the range of uses taking place. The assessment was prepared between March 2021 and May 2021 and is subject to and limited by the information available during this time.

This report has been produced to assess the sustainability effects of the Broadway Neighbourhood Development Plan (NDP) and meets the requirements of the SEA Directive. It is not intended to be a substitute for Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Acronyms

ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
BMV	Best and Most Versatile
CA	Conservation Area
CFS	Call for Sites
DEFRA	Department for Environment, Food and Rural Affairs
DPD	Development Plan Document
EA	Environment Agency
ER	Environmental Report
EU	European Union
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
LCA	Landscape Character Assessment
LDU	Landscape Description Unit
LNR	Local Nature Reserve
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
MHCLG	Ministry for Housing, Communities and Local Government
NDP	Neighbourhood Development Plan
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PPP	Plan, Policy and Programme
PPG	Planning Policy Guidance
PRoW	Public Right of Way
RA	Reasonable Alternative
RPG	Registered Park and Garden
RVNR	Roadside Verge Nature Reserve
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHELAA	Strategic Housing and Employment Land Availability Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
SWDP	South Worcestershire Development Plan
SWDPR	South Worcestershire Development Plan Review

Non-Technical Summary

What is Strategic Environmental Assessment?

- N1. Lepus Consulting has prepared this Strategic Environmental Assessment (SEA) Environmental Report of the Broadway Neighbourhood Development Plan (NDP) on behalf of Wychavon District Council. SEA is the process of informing and influencing the preparation of the NDP to help optimise the environmental performance of the plan.
- N2. This document is known as an Environmental Report (SEA Report). It includes the requirements of an Environmental Report in accordance with the SEA Directive.

Purpose and content of the Environmental Report

- N3. The purpose of this Environmental Report is to:
- Identify, describe and evaluate the likely significant effect of the NDP on environmental factors;
 - Suggest measures by which any negative effects could be mitigated;
 - Make recommendations to improve the environmental performance of the NDP; and
 - Provide an effective opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SEA process that has been carried out to date.
- N4. The Environmental Report contains:
- An outline of the contents and main objectives of the NDP and its relationship with other relevant plans, programmes and strategies;
 - The SEA Framework of objectives and indicators against which the NDP has been assessed;
 - A summary of the reasonable alternatives stage of the NDP;
 - The likely significant effects of the NDP in environmental terms;
 - The measures envisaged to prevent, reduce and as fully as possible offset any significant negative effects which may arise as a result of the NDP;
 - A description of the measures envisaged concerning monitoring; and
 - The next steps for the SEA.
- N5. This report is one in a series of SEA Reports that have been prepared to facilitate an iterative and informative approach to SEA for the NDP. The stages of plan preparation and the associated SEA work are detailed below. A series of figures have been prepared to support the SEA (**Appendix A**).

The screening stage

- N6. Wychavon District Council undertook a screening assessment¹ of the draft Broadway Neighbourhood Development Plan in November 2020, to determine whether the NDP should be screened into the SEA process, informed by consultation with the statutory consultees. This assessment determined that the NDP had potential to lead to likely significant effects on the environment, and therefore an Environmental Report has been prepared, in accordance with the SEA Directive. The NDP was also screened to determine whether a Habitats Regulations Assessment (HRA) was also required. It was concluded that the draft Broadway Neighbourhood Plan is unlikely to have a negative impact on any internationally designated wildlife sites and as such, the recommendation was made that a full Appropriate Assessment is not required.

The scoping stage

- N7. The first stage of the SEA was to prepare a Scoping Report. The Scoping Report identified relevant policies, plans, and programmes (PPPs) and baseline information relating to environmental issues in Broadway. The scoping report was also informed by consultation with the statutory consultees (see **Appendix B**). The scoping report also set out a series of objectives for environmental protection and a SEA Framework, against which the NDP was to be assessed. The SEA Framework included the following three SEA Objectives for which indicators and decision-making criteria are identified:

- Biodiversity;
- Cultural heritage; and
- Landscape

- N8. Following consultation with the Environment Agency a fourth SEA Objective considering the issue of water and flooding has also been explored as part of the SEA process. The full SEA Framework is included at **Appendix C**.

Assessment of reasonable alternatives

- N9. The assessment of reasonable alternatives (RAs) refers to the plan-making stage of exploring different site and policy options. Each reasonable alternative site was appraised in the SEA (**Appendix D**). NDP policies have also been assessed (**Appendix E**).

Pre-submission NDP

- N10. Every policy within the pre-submission NDP and potential site allocation has been assessed against the SEA Framework to identify positive and negative impacts on each SEA Objective. The findings are presented in a scoring matrix format and are accompanied by an explanatory narrative about identified effects. The matrix is not a conclusive tool. Its main function is to show visually whether the NDP proposals are likely to bring positive, negative or uncertain

¹ Wychavon District Council (2020) Broadway Neighbourhood Plan – Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinion. November 2020

effects in relation to the SEA Objectives. The explanatory narrative within the accompanying tables is used to interpret the matrix findings.

- N11. The NDP presents the preferred approach, which includes 34 policies and one site allocation for mixed use development. The NDP group are pursuing this approach based on the various findings and documents comprising their evidence base. The preferred approach which is proposed in the NDP has been appraised in **Chapter 5 and 6**.

Mitigation and Recommendations

- N12. In cases where potentially negative effects have been identified, mitigation suggestions have been given in **Chapter 7**. Mitigation should be considered as part of a sequential hierarchy to deal with adverse effects: avoid, reduce, and then compensate. Mitigation prescriptions might include changes to policy wording such as advocating design guides. In the case of this Environmental Report, mitigation has been supplied to help address potential negative effects in the assessment process so that, if possible, positive or no residual adverse effects remain.

Monitoring

- N13. **Chapter 8** of the SEA Report explains why there should be a monitoring programme for measuring the NDP's implementation in relation to the areas where opportunities for an improvement in environmental performance may arise. Monitoring for the SEA should be integrated with other monitoring processes carried out for the South Worcestershire Development Plan.

Conclusions

- N14. The SEA has identified both positive and negative environmental effects caused by the NDP. However, through applying a suite of mitigation and enhancement measures, it is possible to ensure that there would be no residual significant negative effects and positive effects are enhanced. Effects are summarised in **Table N.1**.

Next Steps

- N15. This Environmental Report (ER) will be published alongside the Pre-Submission Consultation Plan and a period of consultation will follow, providing the opportunity for individuals, businesses and other organisations to submit representations regarding the ER. Wychavon District Council will consider whether the plan is suitable to submit to an independent examiner. If changes to the NDP result in the need for further SEA work, this will need to be undertaken prior to being submitted to the examiner. If the examiner deems the NDP to meet the basic conditions set out in the Town and Country Planning Act² (as amended), it will be subject to local referendum. If over 50% of votes are in favour of the NDP, the NDP will be adopted as part of the development plan.

² Town and Country Planning Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/8/contents> [Date Accessed: 11/05/21]

Table N.1: Anticipated residual effects of the NDP post mitigation.

Topic	Residual effects
Biodiversity	<ul style="list-style-type: none"> The Natural Environment policies, which promote protection and enhancement of biodiversity assets, in addition to trees, woodland and hedgerows will ensure that biodiversity within the Parish is conserved and managed. A negligible impact on biodiversity is predicted overall.
Cultural Heritage	<ul style="list-style-type: none"> It is anticipated that there will be a change to the setting of features of cultural heritage importance, namely Broadway Conservation Area and potentially Listed Buildings, due to development at the Kennel Lane site. Impacts associated with this are anticipated to be negligible to positive due to the replacement of existing buildings and the implementation of the Design Principles and Heritage Assets policies. Built and Natural Environment policies, which promote implementation of sympathetic design, will ensure that future development is sensitively designed to minimise effects on the setting of historical features within the village.
Landscape	<ul style="list-style-type: none"> The proposed allocations seek to promote the use of previously developed land where-ever possible. It is anticipated that there will be a change in the local character of the village as a result of development at allocated sites. This may affect the setting and views for users of the Cotswold Area of Outstanding Natural Beauty (AONB), Public Rights of Way (PROW) and residents within the village itself. However, implementation of the Future Housing and Development policies, Built Environment and Natural Environment policies will ensure that these impacts will be negligible, and may in some instances lead to positive effects for the Kennel Lane site due to replacement and enhancement of existing features. The Future Housing and Development, Local Green Space and Natural Environment policies, which promote implementation of sensitive design, prevent incursion of development into the countryside, safeguard valued landscapes, vistas and skylines and protect the setting of the Cotswold AONB will ensure that any future development within Broadway will be sensitive to local landscape character.
Water and Flooding	<ul style="list-style-type: none"> The proposed mixed use allocation at Kennel Lane NDP is anticipated to direct residential development away from areas at risk of fluvial flooding. Development at the allocated site on Station Road under the SWDP will need to consider mitigation requirements and the distribution of different land uses in relation to Flood Zone 2 and 3 areas on or near to site. It is anticipated that the NDP will result in development within areas at risk of low and medium surface water flooding. However, the implementation of the Flood Risk Reduction policy will reduce this impact to one of negligible significance.

1 Introduction

1.1 Introduction

1.1.1 Lepus Consulting conducted a Strategic Environmental Assessment (SEA) of the Broadway Neighbourhood Development Plan (NDP) 2006-2030 Pre-Submission Consultation Version (dated 13th August 2020) on behalf of Broadway Parish Council. The objective of SEA is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation of local and neighbourhood planning documents.

1.1.2 This report is one in a series of SEA Reports that have been prepared to facilitate an iterative and informative approach to SEA for the NDP. The stages of plan preparation and the associated SEA work are detailed below (see **Figure 1.1**).

1.1.3 This document constitutes the SEA for the NDP and represents an Environmental Report (ER) under the requirements of the SEA Directive. This report represents Stage D of SEA (see **Figure 1.1**) and also documents Stage C of SEA, developing and refining alternatives and assessing effects.

1.1.4 SEA is also one of the ‘tests of soundness’ that planning inspectors use to evaluate the soundness of development plan documents, according to the Environmental Assessment of Plans and Programmes Regulations, 2004³ (the SEA Regulations). The SEA is an objective assessment that helps to inform the identification of preferred options and the best way of implementing these with regards to environmental factors, but it does not necessarily dictate what these will be.

1.1.5 Article 5(1) of the SEA Directive states:

“Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I”.

1.1.6 In respect to NDPs, PPG Paragraph 038 Reference ID: 11-038-20190722 states that:

³ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 12/05/21]

“The strategic environmental assessment needs to consider and compare the reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental characteristics of the area and the likely situation if the neighbourhood plan were not to be made. In doing so it is important to:

Outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;

As part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce, and, as fully as possible, offset them;

Provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives...”

- 1.1.7 Sustainability Appraisal (SA) is a UK-specific procedure used to appraise the sustainability impacts and effects of development plans in the UK. SA is not required for NDPs.

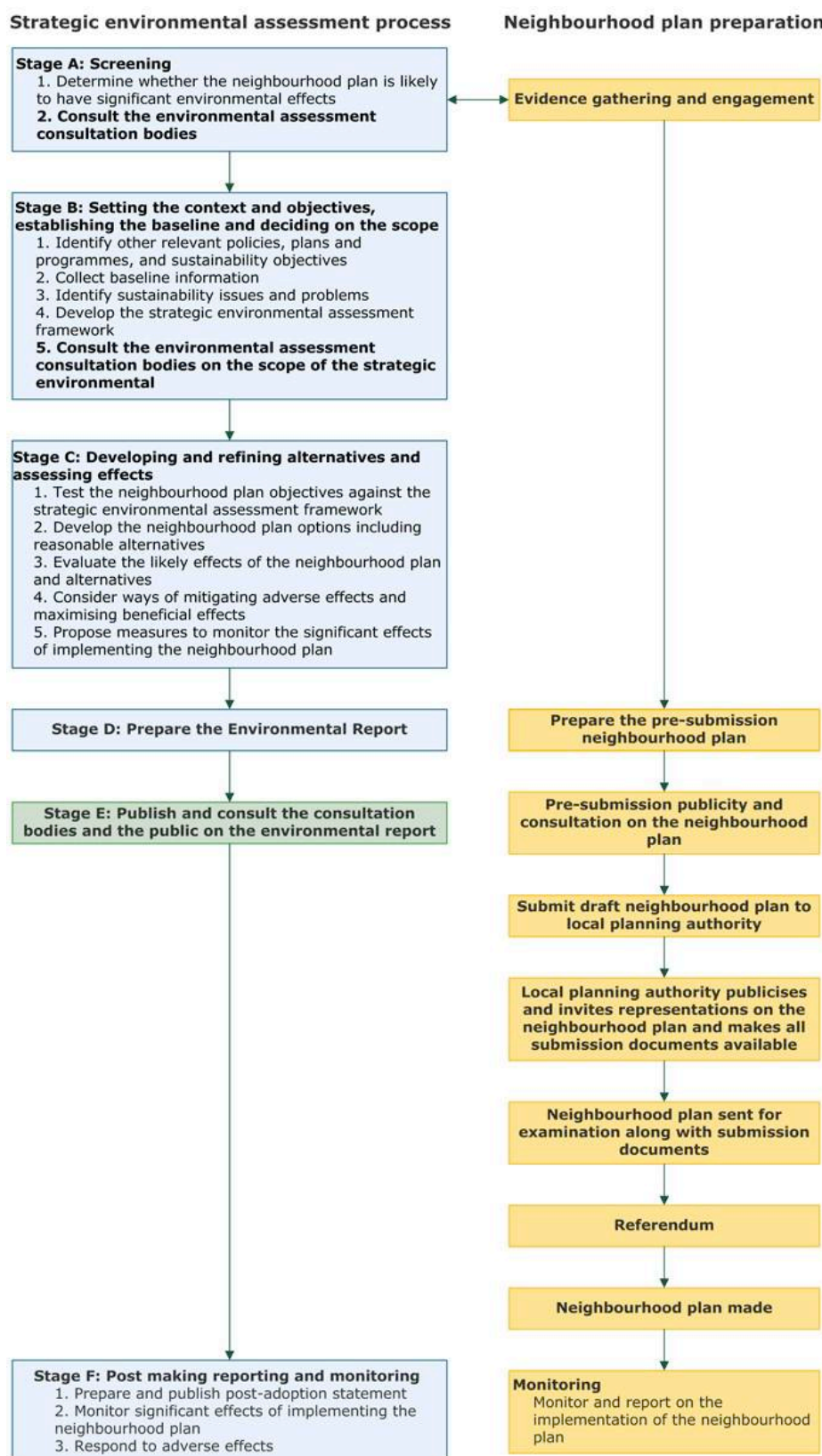


Figure 1.1: Strategic Environmental Assessment and NDP-making processes⁴

⁴ MHCLG (2015) Flowchart: strategic environmental assessment process. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#Strategic-environmental-assessment-process> [Date Accessed: 29/03/21]

1.2 History of the Broadway NDP

- 1.2.1 The creation of Neighbourhood Plans started with the Government's Localism Act which came into effect in April 2012. The Act sets out a series of measures to shift power away from central government and towards local people. One of the Localism Act's key components is the Neighbourhood Plan; a new tier in planning policy which enables local people to shape the development of the community in which they live.
- 1.2.2 Approval to prepare the Plan was given by Wychavon District Council through the approval of the application to designate the NDP area which was based on the Broadway Parish boundary.
- 1.2.3 The Broadway Neighbourhood Development Plan has been developed on behalf of Broadway Parish Council by community volunteers within the NDP Steering Group and Avon Planning Services (APS). Evidence gathering for the Plan started in 2016 and has methodically and openly followed a process with the emphasis on extensive community engagement and researching and assessing the evidence.
- 1.2.4 A number of surveys were undertaken to collect views on what residents would like to change about the area. These surveys included a Neighbourhood Area wide household questionnaire, consultation workshops, independent planning assessments, public meetings and extensive research into existing documentation. The results of these surveys were used to create a set of planning objectives which the NDP Steering Group believed reflected most of the major planning concerns in the community, culminating in the Pre-Submission Consultation Plan.
- 1.2.5 The NDP provides various information including:
- The vision for Broadway Parish;
 - Broadway Village Design Statement;
 - Policies to guide future housing and development, to protect and enhance the built and natural environment and community assets, and to support the local economy and tourism;
 - Definition of the settlement boundary; and
 - Proposed Site Allocation – Land off Kennel Lane / Church Close (Policy HD.4).
- 1.2.6 The Regulation 16 version of the NDP will be published for consultation to provide an opportunity for the public, local organisations and statutory consultees to comment and give feedback.

- 1.2.7 After consultation, the NDP will be subject to inspection by an independent examiner. If the examiner approves the NDP it will be subject to a local referendum. If 50% or more of people voting in the referendum support the plan, the NDP will be adopted. Once adopted, planning decisions in the area will be made in accordance with the NDP and the South Worcestershire Development Plan (SWDP) adopted on 25th February 2016⁵.

1.3 Relationship to SWDP

- 1.3.1 The South Worcestershire Development Plan (SWDP) was adopted on 25th February 2016⁶. Now it has been adopted, this forms the key planning document for the South Worcestershire authorities (Malvern Hills District, Wychavon District and Worcester City) as a whole. The SWDP is a high-level document, which forms the basis of other development plans in the area.
- 1.3.2 When adopted, the Broadway NDP will sit alongside the SWDP as part of the statutory Development Plan. The Development Plan will form the blueprint for future planning decisions in South Worcestershire and Broadway.
- 1.3.3 The NDP must be complimentary to the SWDP and provide more detailed policies, rather than alternative policies that would negate the SWDP.
- 1.3.4 The Planning Practice Guidance (PPG) for Neighbourhood Planning⁷ states that “a *neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan*”.
- 1.3.5 The SWDP was subject to a Sustainability Appraisal (SA), which assessed the likely implications of the plan on social and economic factors, as well as environmental effects. Mitigation measures were suggested where negative or uncertain impacts were identified.

1.4 Relationship to SWDP Review

- 1.4.1 The South Worcestershire Councils are in the process of writing the South Worcestershire Development Plan Review (SWDPR)⁸. The review will provide an updated plan period to 2041 and will update the existing SWDP including the vision, objectives, spatial strategy, site allocations and policies for development within South Worcestershire.

⁵ South Worcestershire Councils (2016) South Worcestershire Development Plan. Available at: <https://www.swdevelopmentplan.org/swdp-2016> [Date Accessed: 29/03/21]

⁶ South Worcestershire Councils (2016) South Worcestershire Development Plan. Available at: <https://www.swdevelopmentplan.org/swdp-2016> [Date Accessed: 29/03/21]

⁷ MHCLG (2018) Guidance: Neighbourhood Planning. Available at: <https://www.gov.uk/guidance/neighbourhood-planning--2> [Date Accessed: 29/03/21]

⁸ South Worcestershire Development Plan Review (SWDPR). Available at: <https://www.swdevelopmentplan.org/swdp-review> [Date Accessed: 06/04/21]

1.5 The SEA process

- 1.5.1 The European Union Directive 2001/42/EC or 'SEA Directive'⁹ applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport etc.
- 1.5.2 The SEA Directive has been transposed into English law by the SEA Regulations.
- 1.5.3 Under the requirements of the SEA Directive and Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment.
- 1.5.4 Where a NDP could have significant environmental effects, it may fall within the scope of the SEA Regulations and so require a SEA.
- 1.5.5 Whether a NDP requires a SEA, and (if so) the level of detail needed, will depend on what is proposed in the Pre-Submission Plan. SEA may be required, for example, where:
- The Broadway area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; or
 - The Broadway NDP may have significant environmental effects that have not already been considered and dealt with through a SA of higher order plans.

1.6 Best Practice Guidance

- 1.6.1 A range of guidance documents have been utilised in preparing the SEA of the Broadway NDP. These are presented in **Box 1.1**.

Box 1.1: Best Practice Guidance for SA/SEA

Lepus follows national guidance and best practice standards set out for SEA which includes:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment¹⁰.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹¹.
- Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework (NPPF)¹².
- Ministry of Housing, Communities and Local Government Planning Practice Guidance (PPG)¹³.

⁹ EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 12/05/21]

¹⁰ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: <http://ec.europa.eu/environment/eia/sea-legalcontext.htm> [Date Accessed: 29/03/21]

¹¹ ODPM (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date Accessed: 29/03/21]

¹² MHCLG (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 29/03/21]

¹³ MHCLG (2018) Planning Practice Guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 06/04/21]

- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans¹⁴.

1.7 Meeting the SEA Directive requirements

1.7.1 **Table 1.1** includes the requirements of the SEA Directive and shows where they have been met within the SEA process.

Table 1.1: Meeting the requirements of the SEA Directive

Requirement for Environmental Report	Location
Include an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	SEA Scoping Report: Chapters 1 & 2 Environmental Report: Chapter 1
Include information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	SEA Scoping Report: Chapters 3 to 5 Environmental Report: Table 4.2
Describe the environmental characteristics of areas likely to be significantly affected	SEA Scoping Report: Chapters 3 to 5
Specify any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	SEA Scoping Report: Chapters 3 to 5 (Key Issues boxes) and Environmental Report: Chapters 7 to 9
Consider the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	SEA Scoping Report: Chapters 3 to 5 Scoping Report: Appendix B Environmental Report: Chapters 1 & 2
Assess the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, and cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Environmental Report: Chapters 4 to 6
Give details of the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Environmental Report: Chapter 7
Give an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Environmental Report: Chapter 4
Include a description of the measures envisaged concerning monitoring.	Environmental Report Chapter 8
Include a non-technical summary of the information provided.	Environmental Report Non-Technical Summary

¹⁴ RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans, January 2018. Available at: <http://www.rtpi.org.uk/media/2668152/sea-sappracticeadvicefull2018c.pdf> [Date Accessed: 29/03/21]

1.8 How the NDP SEA has evolved

- 1.8.1 This report is part of a series of reports that have been prepared to facilitate an iterative and informative approach to SEA.

Stage A: Screening

- 1.8.2 Wychavon District Council undertook a screening assessment¹⁵ of the draft Broadway Neighbourhood Development Plan in November 2020, to determine whether the NDP should be screened into the SEA process, informed by consultation with the statutory consultees. This represents Stage A of the SEA process, as shown in **Figure 1.1**. This assessment determined that the NDP had potential to lead to likely significant effects on the environment, thus it was screened in, in accordance with the SEA Directive.

- 1.8.3 The proposal was also screened to determine whether a Habitats Regulations Assessment (HRA) was also required. The November 2020 screening for HRA concluded that *“...it is considered that the policies of the draft Broadway Neighbourhood Plan are in general conformity with those contained in the SWDP. Although the draft Broadway Neighbourhood Plan does deviate from the land allocations contained within the SWDP, the level of such allocation is considered small enough not to have an impact on internationally designated wildlife sites. It is therefore concluded that the draft Broadway Neighbourhood Plan is unlikely to have a negative impact on any internationally designated wildlife sites and as such, the recommendation is made that a full Appropriate Assessment is not required”*.

Stage B: Scoping

- 1.8.4 Preparing a Scoping Report represents Stage B of the SEA process (see **Figure 1.1**). The Scoping Report identified relevant plans, policies and programmes (PPPs) and baseline information relating to environmental issues in Broadway. The report also set out a series of objectives for environmental protection and a SEA Framework, against which the NDP is to be assessed. The Scoping Report was sent to the Environment Agency, Natural England and Historic England for a five-week consultation. Responses from these statutory consultees can be seen in at **Appendix B**.
- 1.8.5 In considering the scope and level of detail of the information that must be included in the SEA process, and importantly the environmental report, the Scoping Report identified cultural heritage, landscape and biodiversity as topics to be assessed in the SEA Framework. Following comments from the Environment Agency the issue of water and flooding has also been explored as part of the SEA process. All other topics in Annex 1(f) of the SEA Directive were scoped out of further consideration in the assessment process.

¹⁵ Wychavon District Council (2020) Broadway Neighbourhood Plan – Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinion. November 2020

- 1.8.6 Other factors, for example transport / ensuring safe and suitable access, and ground conditions / contamination may form important considerations for any proposals that are brought forward in the planning process and as highlighted in the Strategic Housing and Employment Land Availability Assessment (SHELAA) appraisal of site options (See **Appendix F**). This information should therefore be considered as part of the wider evidence base for the NDP / SWDPR, alongside the potential for mitigation. Similarly, although agricultural resources are not included in the scope of this SEA Framework, use of the Best and Most Versatile (BMV) land is an important consideration in decision making. A map of the sites in relation to Natural England's regional Agricultural Land Classification (ALC) mapping is provided at **Appendix A** for information purposes (please note this does not distinguish between Grade 3a and Grade 3b land, which would need to be verified through site specific assessments).

Stage C: Developing and Refining Alternatives and Assessing Effects

- 1.8.7 Reasonable alternatives sites for the NDP (see **Table 4.1**) considered various deliverable sites including: a) Sites identified in the SHELAA for the SWDPR; b) Sites identified in the SWDPR Preferred Options Report November 2019 (including any proposed reallocated sites from the adopted SWDP); and c) The NDP proposed allocation. Fifteen sites were identified for assessment. These sites were assessed for significant environment effects as part of the SEA process through an assessment of reasonable alternatives. The outcome of this assessment was presented to the NDP Steering Group for consideration. The findings from these assessments are presented in **Chapter 4** with further detail provided at **Appendix D**.

Stage D: Prepare the Environmental Report

- 1.8.8 This Environmental Report represents Stage D of the SEA process, as described in **Figure 1.1** and also documents Stage C, as described in **Chapter 4**.

Stage E: Publish and Consult the Consultation Bodies and the Public on the Environmental Report

- 1.8.9 The NDP and this Environmental Report will be consulted on and any comments will be taken into account going forward to the examination stage (Stage E of the SEA Process, see **Figure 1.1**).

Stage F: Post Making Reporting and Monitoring

- 1.8.10 Once the NDP has been formally adopted, a SEA Post-Adoption Statement will be prepared, in order to demonstrate how environmental considerations highlighted in the SEA process were taken into consideration during the preparation of the plan. The Post-Adoption Statement will fulfil Stage F of the SEA process (see **Figure 1.1**).

2 Baseline Information

2.1 Policies, plans and programmes review

- 2.1.1 A plan or programme may be influenced in various ways by other plans or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. The SEA process takes advantage of potential synergies and addresses any inconsistencies and constraints.
- 2.1.2 The Scoping Report presented an analysis of the objectives of the key PPPs (including legislation) that are relevant to the NDP and the SEA assessment process. These were presented by their geographic relevance, from international to local level.

2.2 Baseline data and information

- 2.2.1 A key part of the scoping process is the collection of baseline data. The purpose of this exercise is to help identify key issues and opportunities facing the area which might be addressed by the NDP, and to provide an evidence base for the assessment.
- 2.2.2 The baseline chapters in the Scoping Report provided a review of existing environmental conditions within the plan area and their likely evolution in absence of the NDP. One of the purposes of consultation on the Scoping Report was to seek views on whether the data selected was appropriate.
- 2.2.3 **Appendix A** (Figures) of this Environmental Report also shows the existing context in respect to environmental designations and other environmental constraints. **Appendix D** (Reasonable Alternatives and site photos) includes a number of contextual photos from the site visit (conducted in April 2021).

2.3 The SEA Framework

- 2.3.1 The purpose of the SEA Framework is to provide a way of ensuring that the NDP considers the environmental needs of Broadway in terms of its environmental effects. It also enables the environmental effects of the NDP policies to be described, analysed and compared.
- 2.3.2 The SEA Framework consists of environmental objectives, which, where possible, the achievement of which is measurable using indicators. There is no statutory basis for setting objectives, but they are a recognised way of considering the environmental effects of a plan and comparing alternatives. The SEA Objectives provide the basis from which effects of the NDP were assessed.

- 2.3.3 The SEA Objectives were developed through the PPP review, the baseline data collection and the key issues identified for the plan area. The SEA topics identified in Annex I (f) of the SEA Directive¹⁶ were one of the key determinants when considering the SEA Objectives to be used for appraisal purposes. The SEA Objectives seek to reflect each of these influences to ensure the assessment process is robust and thorough. The full SEA Framework is presented in **Appendix C**.

¹⁶ Biodiversity flora and fauna; Population; Human health; Soil; Water; Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

3 Methodology

3.1 Approach to assessment

- 3.1.1 The assessment process has used the SEA Framework (provided in full in **Appendix C** and summarised in **Table 3.1**), the review of PPPs, and the baseline (including various mapped data sources), as presented in the SEA Scoping Report, to assess each policy and allocation. Assessments have been undertaken using this empirical evidence and, to a lesser extent, expert judgement. The precautionary principle¹⁷ is applied to all assessments.

Table 3.1: SEA Framework

	SEA Objective	Description
1	Biodiversity	Protect, enhance and manage the flora, fauna and biodiversity assets of Broadway
2	Cultural Heritage	Protect, enhance and manage heritage assets and their settings, including designated and non-designated assets, as well as features and areas of heritage importance
3	Landscape	Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness
4	Water and Flooding	Reduce the number of people at risk of flooding whilst protecting and enhancing water quality.

- 3.1.2 Acting as yardsticks of environmental performance, the SEA Objectives are designed to represent the topics identified in Annex 1(f)¹⁸ of the Directive, and the scope identified in the SEA Scoping Report and subsequently informed by consultation with the statutory consultees (see **Appendix B**).
- 3.1.3 The approach to assessment uses geographic information, the SEA Framework and established standards (where available) to help make the assessment decisions transparent and robust.

¹⁷ Judgment of 7 September 2004 in case C-127/02 (Waddenzee, paragraph 45).

¹⁸ Annex 1(f) identifies: 'the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'.

3.2 Appraisal process

- 3.2.1 When evaluating significance of effect, the SEA draws on criteria in Annex II of the SEA Directive (see **Box 3.2**) and identifies a significance value using the guide in **Table 3.3**.

Box 3.2 *Annex II of the SEA Directive*¹⁹

Criteria for determining the likely significance of effects referred to in Article 3(5) of the SEA Directive

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste- management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
- special natural characteristics or cultural heritage;
- exceeded environmental quality standards or limit values;
- intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

¹⁹ EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 11/05/21]

Table 3.3: Guide to impact significance matrix

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

3.2.2 A value from **Table 3.3** is allocated to each SEA Objective for each policy and reasonable alternative site. The findings are presented in matrix format and are accompanied by a commentary on identified effects. The matrix is not a conclusive tool. Its main function is to show visually whether or not the proposed options are likely to bring positive, adverse or uncertain effects in relation to the SEA Objectives. A commentary has been prepared to interpret the matrix findings. **Table 3.3** shows the key to identifying whether the effects of an option are positive, adverse or uncertain.

3.2.3 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without detrimental effects on known receptors (identified in the baseline).

3.3 Significance

- 3.3.1 Where an environmental impact has been identified, the significance of effect has been categorised as minor or major. **Table 3.3** lists the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative.
- 3.3.2 Each policy and reasonable alternative site that has been assessed in this report is given a score for each SEA Objective in the Framework, as per **Table 3.3**. Scores are not intended to be summed.
- 3.3.3 It is important to note that the scores are high level indicators. The narrative assessment text which details the key decision-making criteria behind each awarded score should always read alongside the score. Assumptions and limitations in **Section 3.8** offer further insight into how each score was arrived at.
- 3.3.4 Significance of effect is a combination of impact sensitivity and magnitude.

3.4 Impact sensitivity

- 3.4.1 Impact sensitivity is measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability (or susceptibility) of the area to the type of development proposed, whether or not environmental quality standards will be exceeded, and if impacts will affect designated areas or areas otherwise recognised through established valuation criteria at a national, regional or local scale (See **Table 3.4**).

Table 3.4: *Geographic scales of receptors*

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

3.5 Impact magnitude

- 3.5.1 Impact magnitude relates to the degree of change the receptor will experience, including the spatial extent and geographical area, probability, duration, frequency and reversibility of the impact (see **Table 3.5**).

Table 3.5: Impact Magnitude

Impact magnitude	Typical criteria
High	<p>Likely total loss of or major alteration to the receptor in question;</p> <ul style="list-style-type: none"> • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	<p>Partial loss/alteration/improvement to one or more key features; or</p> <p>The impact is one of the following:</p> <ul style="list-style-type: none"> • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	<p>Minor loss/alteration/improvement to one or more key features of the receptor; or</p> <p>The impact is one of the following:</p> <ul style="list-style-type: none"> • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

3.6 Predicting effects

- 3.6.1 SEA is a tool for predicting potential significant effects. The actual effects of the policies and reasonable site assessments may be different from those identified. Prediction of effects is made using an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures. The assessment matrices should therefore not be regarded as conclusive as additional information may come to light.
- 3.6.2 The assessments in this report are based on the best available information, including that provided to us by the Neighbourhood Planning Steering Group and information that is publicly available. Every attempt has been made to predict effects as accurately as possible using the available information.
- 3.6.3 SEA operates at a strategic level which uses available secondary data for the relevant SEA Objective. All policies and reasonable site alternatives are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all policies and reasonable site alternatives must be assessed in the same way and any introduction of site-based detail is made clear in the SEA report.

3.7 Distances

- 3.7.1 Where distances have been measured, these are 'as the crow flies' from the furthest edge of the site unless specified otherwise.

3.8 Assessment assumptions

- 3.8.1 A number of assumptions have been used to help incorporate proportionality to the SEA of policies and reasonable site alternatives.
- 3.8.2 In terms of published policy guidance, it is assumed that the following policies will apply to the NDP area and surrounding environments, and have been borne in mind when completing the assessment:
- Adopted SWDP 2006-2030 policies;
 - The Cotswolds AONB Management Plan and associated Position Statements;
 - NPPF policies; and
 - PPG policies.
- 3.8.3 A number of subject-specific methodologies and assumptions have been applied to the appraisal process for each SEA Objective, presented in **Table 3.6**.

Table 3.6: Assessment methodologies and assumptions for each SEA objective

SEA Objective	Assessment Methodologies and Assumptions
1. Biodiversity: Protect, enhance and manage the flora, fauna and biodiversity assets of Broadway.	<p>The biodiversity objective considers adverse impacts of the proposed development at a landscape-scale. It focuses on an assessment of proposed development on a network of designated and undesignated sites, wildlife corridors and individual habitats within the Plan area. Receptors include the following:</p> <p>Designated Sites:</p> <ul style="list-style-type: none"> • Natura 2000 sites; (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites). • Sites of Special Scientific Interest (SSSI). • National Nature Reserves (NNR). • Local Nature Reserves (LNR). • Local Wildlife Sites (LWS). • Local Geological Sites (LGS). <p>Habitats and Species:</p> <ul style="list-style-type: none"> • Ancient woodland. • Priority habitats. • Roadside Verge Nature Reserves (RVNR). <p>Where a development proposal is coincident with, adjacent to or located in close proximity of an ecological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).</p> <p>Negative impacts would be expected where the ecological or geological designations listed above may be harmed or lost as a result of proposals. The assessment is largely based on a</p>

SEA Objective	Assessment Methodologies and Assumptions
	<p>consideration of the proximity of a site and the attributes and qualities of the receptor in question.</p> <p>For the purposes of this assessment, impacts on priority habitats protected under the 2006 NERC Act²⁰ have been considered in the context of Natural England's publicly available Priority Habitat Inventory database²¹. It is acknowledged this may not reflect current local site conditions in all instances.</p> <p>It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover and Green Infrastructure in the Plan area. Development proposals which would be likely to result in the loss of greenfield land are therefore expected to contribute towards a cumulative loss in vegetation cover. This would also be expected to lead to greater levels of fragmentation and isolation across the wider ecological network, such as the loss of habitat stepping-stones and corridors.</p> <p>It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report.</p> <p>It is anticipated that the Council will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of Priority Species and Priority Habitats protected under the NERC Act.</p> <p>Protected or Priority Species survey information is not available for the sites within the Plan area. It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under recorded in certain areas. This under recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such impacts on protected species have not been assessed on a site-by-site basis.</p> <p>It is assumed that the loss of biodiversity assets, such as ancient woodland or an area of priority habitat, are permanent effects.</p> <p>It is assumed that mature trees and hedgerows will be retained where possible.</p> <p>Where development proposals coincide with a Natura 2000 site, a SSSI, NNR, LNR, CWS, CGS or ancient woodland, or are adjacent to a Natura 2000 site, SSSI or NNR, it is assumed that development would have a permanent impact on these nationally important biodiversity and geodiversity assets, and a major negative impact would be expected.</p> <p>Where development proposals coincide with priority habitats, are adjacent to an ancient woodland, LNR, LWS, are located within a SSSI IRZ²² which states to “consult Natural England” or are located in close proximity to a Natura 2000 site, SSSI, NNR, LNR or stand of ancient woodland, it is assumed that development would have an impact on these biodiversity assets, and a minor negative impact would be expected.</p> <p>None of the options for development within Broadway would be expected to significantly impact Natura 2000 sites, NNR, LNR or ancient woodland.</p>

²⁰ Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 21/04/21]

²¹ Natural England (2020) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date Accessed: 21/04/21]

²² Impact Risk Zones (IRZ) are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts

Natural England (2021) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 01 February 2021. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date Accessed: 21/04/21]

SEA Objective	Assessment Methodologies and Assumptions
	<p>Where a development proposal would not be anticipated to significantly impact a biodiversity asset, a negligible impact would be expected for this objective.</p> <p>Where development proposals would be anticipated to enhance biodiversity through the designation of a biodiversity site, a positive impact would be expected.</p>
<p>2. Cultural Heritage: Protect, enhance and manage heritage assets, including designated and non-designated, as well as features and areas of and heritage importance.</p>	<p>Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets.</p> <p>Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Grade I, II* and II Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), and Conservation Areas.</p> <p>Reference is made to the Broadway Conservation Area Appraisal as appropriate in this report (date unknown)²³.</p> <p>Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.</p> <p>Where development proposals are not located in close proximity to any heritage asset, or the nature of development is determined not to affect the setting or character of the nearby heritage asset, a negligible impact would be expected for this objective.</p> <p>When considering any planning application that affects a Conservation Area, authorities must pay special attention to the desirability of preserving or enhancing the character or appearance²⁴. A replacement of a building that currently has a detrimental impact on a Conservation Area could potentially result in a neutral or a minor beneficial effect.</p> <p>It is anticipated that the Council will require a Heritage Statement to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings.</p> <p>None of the sites are located within an Archaeological Sensitive Area as defined under the policies map for the adopted SWDP (where such areas are only presently defined around Worcester City). Reference should be made to the Historic Environment Register (HER) with regards to locally recorded assets and the potential for archaeological remains.</p> <p>It is assumed that desk-based assessments will be required on a site-by-site basis for planning proposals which could potentially impact archaeological features (followed by field evaluation / potential trial trenching where appropriate). At this stage of the NDP preparation process, and the high level of assessment undertaken, there is limited available to indicate areas of archaeological potential within Broadway, and as such no assessment has been carried out with regard to archaeology at present.</p>

²³ Available at

https://www.wychavon.gov.uk/?option=com_fileman&view=file&routed=1&name=Broadway%20Conservation%20Area%20Appraisal%20pt%202.pdf&folder=Documents%2FPlanning%2FConservation%20Area%20Appraisals&container=fileman-files [Date Accessed: 20/04/21]

²⁴ Planning (Listed Buildings and Conservation Areas) Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/9/section/69> [Date Accessed: 12/04/21]

SEA Objective	Assessment Methodologies and Assumptions
<p>3. Landscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.</p>	<p>Impacts on landscape will be largely determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances. Detailed proposals for each development are uncertain at this stage of the assessment. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. However, there is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.</p> <p>Where a development proposal would not be anticipated to impact a local or designated landscape, a negligible impact would be expected for this objective. Where the development or enhancement of green infrastructure / landscape features is proposed, which could potentially enhance the local landscape character, a minor positive impact would be expected for this objective.</p> <p>The Cotswolds AONB</p> <p>The majority of Broadway Parish lies within the Cotswold Area of Outstanding Natural Beauty (AONB). The main purposes of the Cotswolds AONB Management Plan 2018 – 2023²⁵ are to “<i>conserve and enhance the natural beauty of the Cotswolds AONB [and to] increase the understanding and enjoyment of the special qualities of the Cotswolds AONB</i>”.</p> <p>Development proposals which are coincident with or adjacent to the AONB would be likely to alter the character of the nationally designated landscape to some extent and therefore, a major negative impact would be expected. This may however be influenced by the existing use and landscape qualities of the site (for example redevelopment of previously developed land within the AONB may have a negligible or minor adverse effect or minor beneficial effect, subject to context). Development proposals located in close proximity to, and that could potentially be visible from, the AONB could potentially alter the setting of the nationally designated landscape and a minor negative impact would be expected.</p> <p>Landscape Character/Sensitivity:</p> <p>Baseline data on landscape character within Broadway are derived from the Landscape Description Units (LDUs) identified within the Worcestershire Landscape Character Assessment (LCA) and Supplementary Guidance²⁶. Baseline data on landscape sensitivity within Broadway are derived from the Cotswolds (Wychavon) AONB and Environs Landscape and Visual Sensitivity Study²⁷. Key characteristics of each LDU within the LCA and each land cover parcel within the Landscape Sensitivity Study have informed the appraisal of each site proposal against the landscape objective.</p> <p>The appraisal is based on the overall landscape character guidelines and key characteristics, supplemented by a site visit to inform an assessment of landscape character and visual amenity from publicly accessible places. Development proposals which are considered to be potentially discordant with the guidelines and characteristics provided in the published landscape studies would be expected to have a minor negative impact on the landscape objective. Development proposals located within areas classed as ‘urban’ within the LCA/within the settlement</p>

²⁵ Cotswolds Area of Outstanding Natural Beauty Management Plan 2018 – 2023. Available at: <https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/> [Date Accessed: 31/03/21]

²⁶ Worcestershire County Council (2012) Landscape Character Assessment Supplementary Guidance. Available at: <http://gis.worcestershire.gov.uk/website/LandscapeCharacter/Documents/lca%20sg.pdf> [Date Accessed: 21/04/21]

²⁷ White Consultants (2019) Cotswolds (Wychavon) AONB and Environs Landscape and Visual Sensitivity Study Final Report – May 2019. Available at: <https://www.swdevelopmentplan.org/swdp-review/swdp-review-evidence-base/cotswolds-and-malvern-hills-areas-of-outstanding-natural-beauty-aonb-studies> [Date Accessed: 31/03/21]

SEA Objective	Assessment Methodologies and Assumptions
	<p>boundaries, and therefore comprise built-up areas, would be expected to result in a negligible impact on landscape character.</p> <p>Country Parks:</p> <p>Broadway Country Park is located in the south east of the parish. Development in close proximity to a Country Park could potentially result in adverse impacts on the countryside setting and/or views of, or from, Country Parks. None of the reasonable alternative sites in Broadway are considered to result in significant adverse impacts on the Country Park.</p> <p>Views</p> <p>Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the Public Rights of Way (PRoW) network and/or local residents would be expected to have minor negative impacts on the landscape objective.</p> <p>In order to consider potential visual effects of development it has been assumed that the proposals would, broadly, reflect the character of nearby development of the same type.</p> <p>Potential views from individual residential properties have not been assessed at this stage.</p> <p>It is anticipated that the Council will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) to accompany any future proposals, where relevant. The LVIAs should seek to provide greater detail in relation to the landscape character of the development proposals and its surroundings, the views available towards the development, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.</p> <p>Urbanisation of the Countryside/Coalescence:</p> <p>Development proposals which are considered to increase the risk of future development spreading further into the wider landscape would be expected to have a minor negative impact on the landscape objective.</p> <p>Development proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements would be expected to have a potential minor negative impact on the landscape objective.</p>
<p>4. Water and Flooding: Reduce the number of people at risk of flooding whilst protecting and enhancing water quality.</p>	<p>Fluvial Flooding</p> <p>The level of fluvial flood risk present across the NDP area is based on the Environment Agency's flood risk data²⁸, such that:</p> <ul style="list-style-type: none"> • Flood Zone 3: 1% or greater chance of flooding each year; • Flood Zone 2: Between 0.1% - 1% chance of flooding each year; and • Flood Zone 1: Less than 0.1% chance of flooding each year. <p>It is assumed that development proposals will be in perpetuity and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial flooding.</p> <p>Where development proposals coincide with Flood Zone 2, a minor negative impact would be expected. Where development proposals coincide with Flood Zone 3, a major negative impact would be expected. Where development proposals are located within Flood Zone 1, a minor positive impact would be expected.</p> <p>It is anticipated that the Council will require developers to undertake Flood Risk Assessments to accompany any future proposals, where relevant.</p> <p>Surface Water (Pluvial) Flooding</p>

²⁸ Environment Agency (2013) Flood Map for Planning Risk. Available at: <http://apps.environment-agency.gov.uk/wivby/cv/151263.aspx> [Date Accessed: 31/03/21]

SEA Objective	Assessment Methodologies and Assumptions
	<p>According to Environment Agency data²⁹, areas determined to be at high risk of pluvial flooding have more than a 3.3% chance of flooding each year, medium risk between 1% and 3.3%, and low risk between 0.1% and 1% chance.</p> <p>It is assumed that development proposals will be in perpetuity and it is therefore likely that development would be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of surface water flooding.</p> <p>Development proposals located in areas at low and medium risk of surface water flooding would be expected to have a minor negative impact on pluvial flooding. Development proposals located within areas at high risk of surface water flooding would be expected to have a major negative impact on pluvial flooding.</p> <p>Where development proposals are not located in areas determined to be at risk of pluvial flooding, or are located in areas determined to be at very low risk of flooding (less than 0.1% chance), a negligible impact on pluvial flooding would be expected for the purposes of this assessment.</p> <p>Groundwater</p> <p>The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any development proposal that is located within a groundwater SPZ could potentially have an adverse impact on groundwater quality. None of the reasonable alternative sites in Broadway coincide with SPZs.</p> <p>No information on groundwater flooding or other sources of historic flooding were available for this assessment and would need to be informed by the Strategic Flood Risk Assessment, and site-specific information.</p> <p>Watercourses:</p> <p>Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water³⁰.</p> <p>An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted³¹. However, it is considered that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. In this assessment, a 200m buffer zone was deemed appropriate.</p> <p>Development proposals located within 200m of a watercourse would be expected to have a minor negative impact on local water quality.</p> <p>Water Consumption:</p> <p>It is assumed that development proposals will be in accordance with the national mandatory water efficiency standard of 125 litres per person per day, as set out in the Building Regulations 2010³².</p>

²⁹ Environment Agency (2013) Risk of flooding from surface water – understanding and using the map. Available at: <https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map> [Date Accessed: 31/03/21]

³⁰ World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: https://www.who.int/water_sanitation_health/resourcesquality/wqmchap2.pdf [Date Accessed: 31/03/21]

³¹ Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date Accessed: 31/03/21]

³² The Building Regulations 2010. Available at: <http://www.legislation.gov.uk/uksi/2010/2214/contents/made> [Date Accessed: 31/03/21]

3.9 Limitations

- 3.9.1 The assessment of reasonable alternatives and the preferred option is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available.
- 3.9.2 Data granularity is sometimes an issue where a dataset does not match the scale of some smaller sites. For example, landscape character area profiles cover larger areas than the relatively small allocated sites. This restricts the ability of the SEA process to differentiate between sites when assessing their impact on the area profile.
- 3.9.3 All data used is secondary data available from Wychavon District Council, the Neighbourhood Planning Steering Group and publicly available web-based information.
- 3.9.4 Properties close to or adjacent to potential development sites were not accessed in order to gain views and evaluate impacts. All site assessment work was based on views from publicly accessible spaces, with the site visit undertaken on 13th April 2021 when trees were not yet in full leaf. Contextual site photos are provided at **Appendix D**.

3.10 Mitigation

- 3.10.1 Mitigation has been considered in a hierarchical approach. Mitigation aims to reduce identified adverse environmental effects. The mitigation hierarchy is a sequential process that operates in the following way: firstly, if possible, adverse effects should be avoided. Failing this, the nature of the effect should be reduced, if possible, so that it is no longer significant. If neither avoidance nor reduction is feasible, mitigation measures should be considered. Mitigation prescriptions might include changes to policy wording such as advocating design guides. An assessment has then been made to determine residual impacts following the implementation of mitigation.

4 Reasonable Alternatives

4.1 Introduction

4.1.1 The SEA Directive requires that the SEA process considers:

“Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” and gives ‘an outline of the reasons for selecting the alternatives dealt with’ (Article 5.1 and Annex I (h)).

4.1.2 In the UK, reasonable alternatives are commonly referred to as ‘options’.

4.1.3 The role of the SEA is to inform the plan making group in their selection and assessment of options. The findings of the SEA can help with refining and further developing these options in an iterative and on-going way. The SEA findings do not form the sole basis for decision-making; other studies, the feasibility of the option and consultation feedback will also contribute to the decisions made by the NDP Steering Group/Parish Council.

4.1.4 Options assessment is proportionate. The options do not have to be mutually exclusive and elements of each may be further developed into a preferred option.

4.1.5 The results of a SEA may reveal that there is no single, best performing option. Where there is no obvious discernible difference this will be documented in the SEA process.

4.2 Selecting Reasonable Alternatives

4.2.1 PPG notes that ‘reasonable alternatives’ are the different realistic options considered by the plan-maker in developing the policies in its plan. It notes that the SEA process should provide conclusions on the overall sustainability of the different alternatives and that the alternatives must be realistic and deliverable³³.

4.2.2 Reasonable alternatives for an NDP could constitute:

- A) Growth alternatives for housing and employment use e.g. the total number of dwellings or employment floorspace across the NDP area;
- B) Alternative site allocations for development; and
- C) Alternative policies, including a comparison between the inclusion of NDP policies against the ‘do nothing’ approach.

4.2.3 It was agreed with Wychavon District Council and Broadway Parish Council that an assessment of reasonable alternatives would comprise an assessment of alternative sites and policies (points B and C in the list above).

³³ MHCLG (2018) Planning Practice Guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 12/05/21]

4.2.4 The Neighbourhood Planning Group have been working collaboratively with Wychavon District Council on the required housing numbers to meet locally identified needs. It is understood that the proposed dwelling numbers in the NDP (See Figure 7) would meet these needs over the NDP plan period.

4.3 Reasonable alternatives: Do Nothing

4.3.1 As part of the assessment of reasonable alternatives consideration has been given to the impact of a 'do-nothing' scenario i.e. without implementation of the NDP. This assessment assumes that policies outlined in the South Worcestershire Development Plan (SWDP) adopted in February 2016 and other high-level policies and plans will continue to be implemented.

Table 4.6: Likely evolution of the environment without the adoption of Broadway NDP

SEA Topic	Score	Evolution without the Plan
Biodiversity	0	<ul style="list-style-type: none"> In the absence of the NDP, Policy SWDP 22 provides that developments that would have an adverse impact on internationally or nationally designated biodiversity sites will not be permitted. This policy also seeks to avoid the avoid the loss of ancient woodland and veteran trees, unless the benefits of the proposal in a given location clearly outweigh the loss or deterioration. Under Policy SWDP 22, development which would compromise the favourable condition or conservation status of a locally designated site, an important individual tree or woodland, species or habitats of principal importance recognised in the Biodiversity Action Plan, or listed under Section 41 of the NERC Act 2006, will only be permitted if the need for and the benefits of the proposed development outweigh the loss. Where loss of the aforementioned factors is unavoidable compensatory measures will be required. In the first instance this should be through on-site mitigation. Off-site mitigation will only be acceptable where on-site mitigation is shown not to be possible. Policy SWDP 22 states “<i>Development should, wherever practicable, be designed to enhance biodiversity and geodiversity (including soils) conservation interests as well as conserve on-site biodiversity corridors / networks. Developments should also take opportunities, where practicable, to enhance biodiversity corridors / networks beyond the site boundary</i>”. In the absence of the NDP, Policy SWDP 22 seeks to provide protection to biodiversity assets including designated sites and habitats and species of principle importance. Some provision is also made for biodiversity enhancement through this policy, although it is uncertain the level of measurable net gain this may deliver. Policy SWDP 5: Green Infrastructure specifies the overall level of Green Infrastructure (GI) required for housing developments which may include habitat creation, along with other GI measures.
Cultural Heritage	0	<ul style="list-style-type: none"> Policies SWDP 6 and SWDP 24 relate to the historic environment and seek to ensure that development proposals conserve and enhance heritage assets, including assets of potential archaeological interest. These policies collectively cover designated heritage assets i.e. listed buildings, conservation areas, scheduled monuments, registered parks and gardens and registered battlefields, as well as

SEA Topic	Score	Evolution without the Plan
		<p>undesigned heritage assets and the historic landscape, including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings and archaeological remains of all periods. A range of legislation and national guidance also affords protection to heritage assets.</p> <ul style="list-style-type: none"> In the absence of the NDP, the character and setting of designated and non-designated heritage assets are afforded protection under the SWDP. However, it is uncertain as to the extent to which the accessibility, local awareness or locally distinctive elements of the historic landscape may be enhanced over time.
Landscape	0	<ul style="list-style-type: none"> Policy SWDP 23 relates to the Cotswolds AONB and states that: A. Development that would have a detrimental impact on the natural beauty of an AONB will not be permitted; B. Any development proposal within an AONB must conserve and enhance the special qualities of the landscape; and C. Development proposals should have regard to the most up-to-date approved AONB Management Plans. Policy SWDP 25 relates to landscape character and seeks to ensure that development proposals are appropriate to, and integrate with, the character of the landscape setting and that they take account of the Worcestershire Landscape Character Assessment and its guidelines. All developments should conserve, and where appropriate, enhance the primary characteristics and important features of the land cover parcel, and have taken any available opportunity to enhance the landscape. An LVIA will be required for all major development proposals and other proposals that may have a detrimental effect on landscape resources, attributes or features. The Cotswolds AONB will continue to be proactively and effectively managed by the Cotswold Conservation Board and, in the absence of the NDP, would be likely to be conserved and enhanced through the Cotswold AONB Management Plan 2018 – 2023. In the absence of the NDP, the local distinctive and rural landscape characteristics of the relevant Worcestershire Landscape Character Areas (LCA) such as arable and pastoral fields would be protected to a degree through policies set out in the SWDP, although it is uncertain the extent to which important landscape features of Broadway would be enhanced. In the absence of the NDP, it is uncertain the extent to which distinctive and long-distance countryside views enjoyed by sensitive receptors, including local residents and those on the local PRoW network would be likely to change. Policies set out in the SWDP (such as SWDP 21 relating to design principles and SWDP 25 relating to the landscape character) would be likely to protect some views but may not be specific to Broadway Parish. Without proactive management to preserve landscape features, visual amenity and open space, the quality of these views could potentially deteriorate over time.
Water and Flooding	0	<ul style="list-style-type: none"> Policies SWDP 28: Management of Flood Risk, SWDP 29: Sustainable Drainage Systems, SWDP 30: Water Resources, Efficiency and Treatment and SWDP 31: Pollution and Land Stability relate to the water environment. In the absence of the NDP, the NPPF and forementioned policies provide specific tests and mitigation that must be applied with respect to all sources of flood risk.

SEA Topic	Score	Evolution without the Plan
		<ul style="list-style-type: none"> Under policy SWDP 30 all development proposals must demonstrate that there are or will be adequate water supply and water treatment facilities in place to serve the whole development. Development proposals in areas where there is no mains foul drainage provision should consider the hierarchy of drainage options set out in the PPG. For housing proposals, it must be demonstrated that the daily non-recycled water use per person will not exceed 110 litres per day. The Environment Agency (EA) will continue to pursue water quality improvements for surface and ground water bodies in the catchment area. The ecological and chemical status of each waterbody would be likely to improve to some extent over the coming years in line with requirements of the Water Framework Directive.

4.4 Reasonable Alternatives: Sites

4.4.1 Policy HD.4 of the NDP is the key policy that holds the proposed housing site information. There are alternative sites to this that are tested in the reasonable alternatives (RA) process. All identified RA sites, including the proposed site within Policy HD.4, were assessed by Lepus Consulting in March and April 2021 and informed by a site visit on 13th April 2021.

4.4.2 Reasonable alternatives sites for the NDP (see **Table 4.1**) considered various deliverable sites including:

- Sites identified in the SHELAA process for the SWDPR;
- Sites identified in the SWDPR Preferred Options Report November 2019 (including any proposed reallocated sites from the adopted SWDP); and
- The NDP proposed allocation.

4.4.3 Site SWDP59/19 is allocated for development in the adopted SWDP to incorporate community facilities, new car and coach parking, enhancement and protection of the existing nature reserve, land exchange with the football club and housing of up to 65 homes to the south eastern edge of the site. An uplift in housing on this site is being considered as part of the SWDPR and NDP in reallocating this site. An application for a *“Medical centre with on site parking, cycle and refuse storage and new access onto Station Road”* (Reference 18/02689/FUL) was approved in 2019 ahead of any homes, and this component is currently under construction. No current planning application for the housing component of the development has been identified on the site. The allocation for 65 houses on this site as well as the approved 18/02689/FUL scheme is taken to represent the existing baseline for this site.

4.4.4 In identifying the potential allocation for site HD.4 the Neighbourhood Planning Working Group applied the following locally established criteria assembled from evidence gathering and community consultation:

- A preference for previously developed land;
- Not prominent in the landscape;

- Is well-connected to existing village amenities, for example shops, schools, playing fields, pubs and bus stops;
- Not at high risk of flooding: cross-referenced with the Environmental Agency Fluvial and Surface Water Flood Risk Maps;
- Not cause harm to the setting of Listed Buildings, the Area of Outstanding Natural Beauty or Broadway Conservation Area;
- Available for development and without known impediment to development; and
- Does not cause harm to important views, designated green spaces, valued landscapes, residential amenities or habitats.

4.4.5 In preparing for the NDP a series of surveys was carried out in the Village to gauge responses views about some of the important elements that would help to determine the form of the Plan. These surveys included:

- A Mood Survey – to assess opinion about the future of the village
- A Village Survey –to assess feelings about development and pressures
- A Housing Needs Survey

4.4.6 Some of the important points arising from these surveys were the need for affordable housing, locally based for local people, conservation of Broadway's unique historical character and of its green environment, preservation of a vibrant economy serving the needs of local people, and restoration of the few less well maintained and less attractive areas, and maximizing of the local much-loved landscape, open and green spaces. The fact that wildlife is locally abundant and familiar within the built up village is seen as an important part of Broadway's attractiveness. The selection of the Kennel Lane Site was identified as a potential allocation as it met a number of these points. Preliminary discussion with the landowners confirmed the availability of the land for development.

4.4.7 This chapter sets out the SEA of 15 reasonable alternative sites which have been considered in the SEA, which are listed in **Table 4.1**, and shown in **Figure 4.1**. These sites have been identified as reasonable alternatives for the Broadway NDP through a review of the 'Call for Sites' (CFS) process and accompanying SHELAA process for the SWDPR, to include all potential SWDPR Regulation 18 reasonable alternatives. No other alternative sites outside of the proposed allocation for HD.4 have been identified by the NDP Steering Group outside of those identified in the SWDPR SHELAA process.

- 4.4.8 For clarity, and to aid interpretation of the Environmental Report, a number of site options at varying scales have been identified in the vicinity of the proposed NDP allocation (Site HD.4). An insert has been provided on **Figure 4.1** to help distinguish between these options. Site HD.4 (NDP proposed allocation) is denoted in red hatching on this insert. Sites CFS0472sc (green dash), CSF0472 (purple) and CFS0406 (blue dots) were identified through the SHELAA process for the SWDP review and each incorporate component parts of the HD.4 proposed allocation. The proposed HD.4 allocation primarily focuses on brownfield land within the settlement boundary, including the entirety of Sites CFS0472sc and CFS0406, but excluding a large proportion of greenfield land encompassed by Site CFS0472.
- 4.4.9 Information on the potential housing / employment space as illustrated in **Table 4.1** should be treated as indicative at this stage. This indicative data has been derived from publicly available information sources including the SWDPR and NDP. For transparency in the assumptions made information sources are provided in **Table 4.1**.

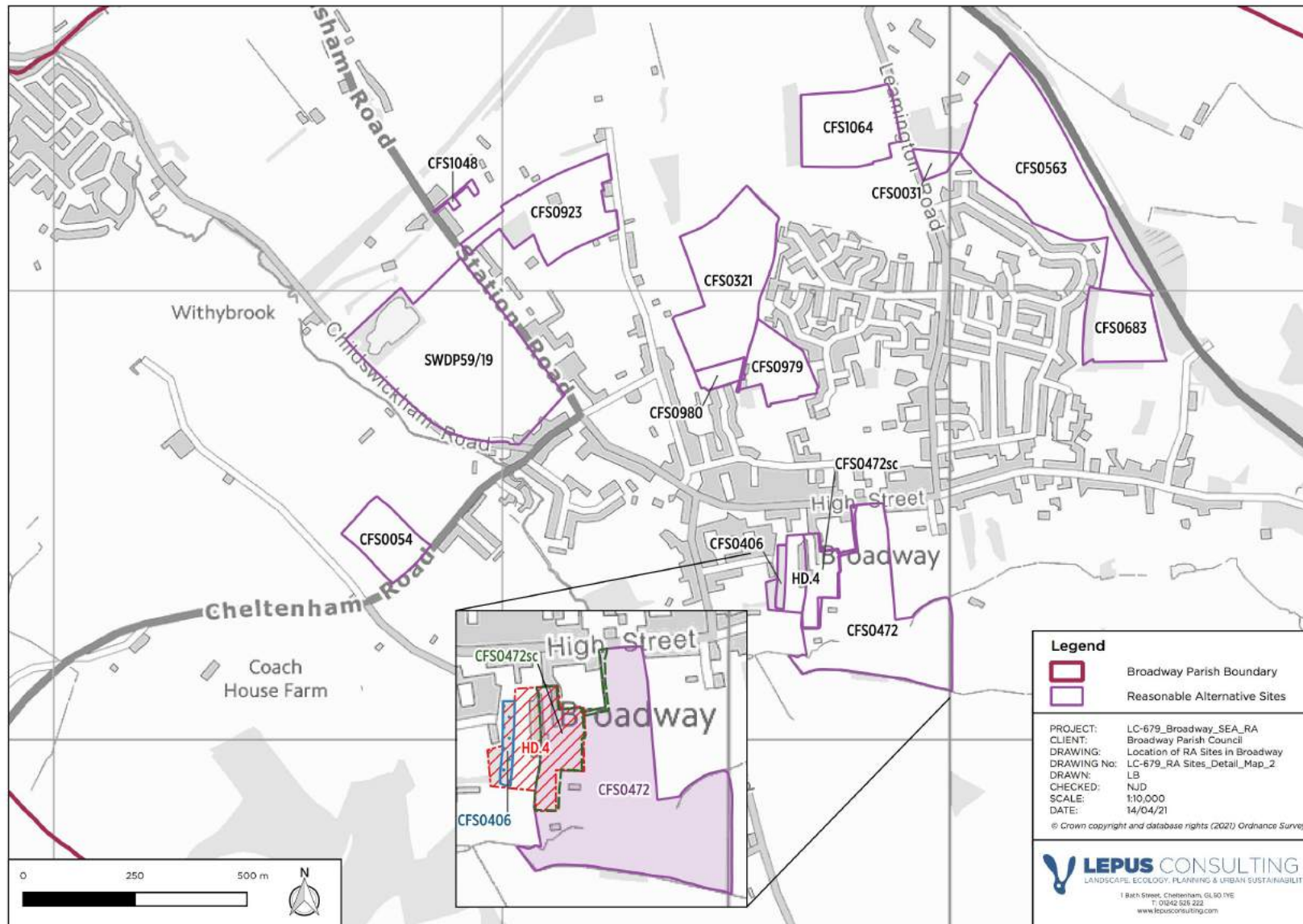


Figure 4.1: Location of the reasonable alternative sites

Table 4.1: Reasonable alternative site details

Site Reference	Site Address	Site Area (ha)	Proposed Site Use	Indicative housing / employment space ³⁴
CFS0031	Land north of Glenmore, 35 Leamington Road, Broadway	0.44	Residential	11 dwellings*
CFS0054	Land to the north west of Cheltenham Road, Broadway	1.91	Residential	34 dwellings*
CFS0321	Land between Springfield Lane and Averill Close, Broadway	5.92	Residential	107 dwellings*
CFS0406	Land to the east of Church Close, Broadway	0.30	Mixed	7 dwellings*
CFS0472	Land at Kennel Lane / High Street, Broadway	8.52	Mixed	153 dwellings*
CFS0472sc	Land at Kennel Lane / High Street, Broadway	1.24	Employment / Other	Public car park and employment uses totalling 1.24 ha. SWDPR Preferred Options report (November 2019), Site allocation SWDP New 73
CFS0563	Land at Hill Farm, Broadway	7.86	Residential	141 dwellings*
CFS0683	Land off Sandcroft Avenue, Broadway	2.55	Residential	46 dwellings*
CFS0923	Ridgeway, Station Road, Broadway	3.17	Residential	57 dwellings*
CFS0979	Land to the south of Averill Close, Broadway	1.94	Residential	35 dwellings*
CFS0980	Land north of Gordon Close, Back Lane, Broadway	0.47	Residential	11 dwellings*
CFS1048	Land at Station Road, Broadway	0.33	Residential	6 dwellings*
CFS1064	Land off Leamington Road, Broadway	3.45	Residential	62 dwellings*
SWDP59/19	Land adjacent Station Road	10.99	Residential / Other	65 dwellings carried forward from adopted SWDP allocation. Additional 35 houses (100 total) based on SWDP Preferred Options Report (November 2019), Site SWDP Reallocate 32. Additional 19 houses (opposed to 35 additional) based on NDP Fig 7.
Site HD.4	Land off Kennel Lane / Church Close	2.33	Mixed Use	Approximately 30 dwellings based on NDP Fig 7, with further mixed employment, retail and car parking uses.

4.4.10 **Appendix D** provides an appraisal of the 15 reasonable alternative sites considered. Each appraisal includes an SEA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation, following the methodology as set out in **Chapter 3**. Assessment narratives follow the impact matrices for each site, within which the findings of the appraisal and the rationale for the recorded impacts are described.

³⁴ Please note – Data in this column with an asterisk (*) indicates information provided by South Worcestershire Councils and cited in Reg 18II SA report for SWDPR

4.5 Assessment of Sites pre-mitigation

4.5.1 The impact matrices for each site assessed in this report (pre-mitigation) have been brought together in **Tables 4.2-4.5**. These impacts should be read in conjunction with the assessment text narratives in **Appendix D**, as well as the topic-specific methodologies and assumptions presented in **Chapter 3**. Whilst the assessment findings have drawn on the assumptions in **Table 3.2**, all assessment information excludes consideration of detailed mitigation i.e. additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. Presenting assessment findings ‘pre-mitigation’ facilitates transparency to the decision makers.

4.5.2 Mitigation is discussed in **Chapter 7** of this report and identifies ways in which mitigation might usefully be applied to sites so as to reduce environmental impacts, on any other NDP policies through mitigation may be achieved.

4.6 SEA Objective 1 – Biodiversity

Table 4.2: Impact matrix for RA sites assessed in this report pre-mitigation (Biodiversity)

Site Reference	SEA Objective 1 - Biodiversity							Rank
	European Site	Site of Special Scientific Interest (IRZ)	National Nature Reserve	Ancient Woodland	Local Nature Reserve	Local Wildlife Site	Priority Habitat	
CFS0031	0	0	0	0	0	0	0	1
CFS0054	0	0	0	0	0	0	0	1
CFS0321	0	0	0	0	0	0	0	1
CFS0406	0	0	0	0	0	0	0	1
CFS0472	0	-	0	0	0	0	0	2
CFS0472sc	0	0	0	0	0	0	0	1
CFS0563	0	0	0	0	0	0	0	1
CFS0683	0	0	0	0	0	0	0	1
CFS0923	0	0	0	0	0	0	-	3
CFS0979	0	0	0	0	0	0	0	1
CFS0980	0	0	0	0	0	0	0	1
CFS1048	0	0	0	0	0	0	0	1
CFS1064	0	0	0	0	0	0	0	1
SWDP59/19	0	0	0	0	0	--	-	4
HD.4	0	0	0	0	0	0	-	3

- 4.6.1 All RA sites in Broadway are located within approximately 2km of 'Broadway Hill' SSSI. Sites CFS0472 and CFS0683 are located within an Impact Risk Zone (IRZ) which states that *"residential development of 100 units or more [and] any residential development of 50 or more houses outside existing settlements/urban areas"* should be consulted on with Natural England. Site CFS0683 is proposed for the development of 46 dwellings and therefore, a negligible impact would be expected at this site. Site CFS0472 is proposed for the development of 153 dwellings and is located outside the Broadway development boundary. Therefore, the proposed development at Site CFS0472 could potentially result in a minor negative impact on the features for which this SSSI has been designated. A small proportion of Site HD.4 is also located within this IRZ. The number of dwellings proposed at this site is less than 50 (and understood to be approximately 30 at this stage) and therefore a negligible impact would be expected at this site.
- 4.6.2 Site SWDP59/19 coincides with 'Broadway Gravel Pit' Local Wildlife Site (LWS). Broadway Gravel Pit lies to the northwest boundary of the site. Broadway Gravel Pit is a LWS managed by Worcestershire Wildlife Trust. It comprises a seasonally flooded gravel pit and carr woodland and is of some local importance as a wetland site. The proposed development at this site has the potential to result in direct negative impacts on this LWS (prior to any mitigation), and therefore, a major negative impact would be expected.
- 4.6.3 Sites SWDP59/19 and HD.4 coincide with deciduous woodland priority habitat / habitats of principle importance as identified by Natural England datasets³⁵ for habitats of principal importance under Section 41 of the Natural Environment and Rural Communities Act (2006). Site CFS0923 coincides with traditional orchard habitats of principle importance. The proposed development at these three sites could potentially result in the loss of these habitats, and therefore have a minor negative impact on the overall presence of priority habitats / habitats of principle importance in the parish.
- 4.6.4 Sites SWDP59/19, CFS0923, HD.4 and CFS0472 are therefore considered to exhibit potential strategic biodiversity constraints prior to any mitigation in terms of designated biodiversity assets. Mitigation considerations are discussed in **Chapter 7** of this report. The remaining sites are not subject to designations, but with the exception of sites CFS0472sc and CFS1048 are greenfield sites which may exhibit varying levels of ecological value. Biodiversity considerations for all sites would need to be assessed on a case-by-case basis, and informed by a desktop survey, biological records centre data, Phase 1 habitat survey and potentially protected species surveys (as required).

³⁵ Natural England (2020) Priority Habitat Inventory (England). Available at <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date Accessed: 11/05/21]

4.7 SEA Objective 2 – Cultural Heritage

Table 4.3: Impact matrix for RA sites assessed in this report pre-mitigation (Cultural Heritage)

Site Reference	SEA Objective 2 – Cultural Heritage						Rank
	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park & Garden	
CFS0031	0	0	-	0	0	0	3
CFS0054	0	0	0	0	0	0	1
CFS0321	0	0	-	-	0	0	4
CFS0406	0	0	-	-	0	0	5
CFS0472	0	-	-	-	0	0	6
CFS0472sc	0	0	-	+/-	0	0	2
CFS0563	0	0	-	0	0	0	3
CFS0683	0	0	0	0	0	0	1
CFS0923	0	0	0	-	0	0	3
CFS0979	0	0	0	0	0	0	1
CFS0980	0	0	-	-	0	0	4
CFS1048	0	0	0	0	0	0	1
CFS1064	0	0	-	0	0	0	3
SWDP59/19	0	0	0	0	0	0	1
HD.4	0	0	-	+/-	0	0	2

- 4.7.1 Site CFS0472 is located adjacent to the Grade II* Listed Building ‘Tudor House’, approximately 25m from ‘Broad Close’ and within 100m from ‘Picton House’, ‘Little Gables’, ‘Lygon Arms Hotel’ and ‘Prior’s Manse’. The proposed development at this site could potentially have a minor negative impact on the setting of these Listed Buildings. Sites CFS0054, CFS0321, CFS0406, CFS0472sc, CFS0563, CFS0683, CFS0923, CFS0979, CFS0980 and HD.4 are located 500m or less from one or more Grade II* Listed Buildings, however these sites and Listed Buildings are separated by built form within Broadway. Therefore, the proposed development at these ten sites, or any of the other RAs, would be expected to have a negligible impact on the setting of Grade II* Listed Buildings.

- 4.7.2 Site CFS0472 is located adjacent to the Grade II Listed Building '63, High Street', and within 50m from several other Grade II Listed Buildings located along the High Street. Sites CFS0472sc and HD.4 are also located adjacent to the Grade II 'Outbuilding approximately 40 metres south of Number 43', which is situated adjacent to the northern boundary of these sites. Site CFS0563 is located approximately 70m from 'Bibsworth House', and Sites CFS0031 and CFS1064 are located approximately 100m from this Listed Building. Site CFS0980 is located approximately 40m from 'Russell Cottages', and Site CFS0321 is located approximately 90m from this Listed Building. Site CFS0406 is located approximately 130m from 'Church of St Michael'. The proposed development at Sites CFS0031, CFS0321, CFS0406, CFS0472, CFS0472sc, CFS0563, CFS0980, CFS1064 and HD.4 could potentially have a minor negative impact on the setting of these Grade II Listed Buildings.
- 4.7.3 Sites CFS0683, CFS0923, CFS0979 and SWDP59/19 are located 350m or less from one or more Grade II Listed Buildings. However, these sites and Listed Buildings are separated by built form within Broadway. Therefore, the proposed development at these four sites would be expected to have a negligible impact on the setting of these Listed Buildings.
- 4.7.4 Sites CFS0406, CFS0472, CFS0472sc and HD.4 are located wholly within Broadway Conservation Area (CA). Sites CFS0321, CFS0923 and CFS0980 are located adjacent to this CA. The proposed development at these seven sites could potentially alter the character and/or setting of this CA and as a result, have a minor negative impact on the local historic environment.
- 4.7.5 Site CSF0472 is considered to make a strong contribution to the character and qualities of the conservation area including 'prominent open space', focal features and 'significant views' as recorded in the Broadway Conservation Area Appraisal³⁶. Sites CFS0472sc and HD.4 contain some 'negative features' under the Broadway Conservation Area Appraisal through the existing built form and associated structures, although HD.4 also contains some 'significant trees & tree groups' along the western edge. Some of the existing employment units for Sites CFS0472sc and HD.4 could be considered to have a detrimental impact on the character and appearance of the CA, and their replacement on this component of the site could lead to a neutral or minor positive impact on the CA as a whole, subject to site design (see site photos at **Appendix D**).
- 4.7.6 Sites CFS0054, CFS0683, CFS0979, CFS1048 and SWDP59/19 are considered the best performing options having a negligible impact on heritage assets, with Sites CFS0472sc and HD.4 potentially generating both mixed minor positive and negative effects. Site CFS0472 is considered the worst performing option in relation to this SA objective.

³⁶ Wychavon District Council (2006) Broadway Conservation Area Appraisal. Available at: https://www.wychavon.gov.uk/?option=com_fileman&view=file&routed=1&name=Broadway%20Conservation%20Area%20Appraisal%20pt%202.pdf&folder=Documents%2FPlanning%2FConservation%20Area%20Appraisals&container=fileman-files [Date Accessed: 20/04/21]

4.8 SEA Objective 3 – Landscape

Table 4.4: Impact matrix for RA sites assessed in this report pre-mitigation (Landscape)

Site Reference	SEA Objective 3 – Landscape					Rank ³⁷
	AONB	Country Park	Landscape Character (Worcs. LCA)	Views from PRow Network	Risk of Encroachment / Sprawl	
CFS0031	--	0	-	0	0	3
CFS0054	-	0	-	-	-	6
CFS0321	--	0	-	-	-	5
CFS0406	--	0	-	-	0	4
CFS0472	--	0	-	--	--	7
CFS0472sc	-	0	0	-	0	2
CFS0563	--	0	-	-	-	6
CFS0683	--	0	-	-	-	6
CFS0923	-	0	-	-	-	6
CFS0979	--	0	-	-	-	5
CFS0980	--	0	-	-	0	4
CFS1048	0	0	0	0	0	1
CFS1064	--	0	-	-	-	5
SWDP59/19	0	0	0	0	0	1
HD.4	-	0	0	-	0	2

4.8.1 All sites, except for Sites CFS1048, CFS0923, CFS0054 and SWDP59/19, are located within the Cotswolds AONB.

4.8.2 Specific tests would also have to be met for any development deemed to be ‘major’ development in the AONB (see NPPF Para 172). The definition of ‘major development’ when applied to AONBs is highly dependent on context (opposed to other definitions of ‘major development’ for planning purposes). A precautionary approach is adopted in this assessment, although it is acknowledged that the scale of impacts on the AONB may vary based on size, location and design. Sites located within the AONB are considered as having a potential major negative effect on the AONB pre-mitigation, unless these sites are at least partly developed in which case a minor negative effect is recorded in accordance with **Table 3.2**.

³⁷ A number of greenfield sites generate similar SA scores. Rank between levels 5 and 6 are informed by the findings of the landscape sensitivity study. Greenfield parcels with a medium sensitivity to housing development (CFS0321, CFS0979, CFS1064) are given a rank of 5. Greenfield parcels with a high / medium or high sensitivity to housing development are given a rank of 6.

- 4.8.3 Sites CFS0054 and CFS0923 are located adjacent to the AONB and are considered to make some contribution to the setting of the AONB based on observations from the site visit and could potentially have a minor negative effect on the AONB. Sites SWDP59/19 and CFS1048 are outside of the AONB and are considered to make a more limited contribution to the setting of the AONB due to intervening features and built form and therefore a negligible effect is recorded. Site SWDP59/19, followed by Site CFS1048 are considered to be the best performing options with respect to the AONB, followed by Sites CFS0472sc and HD.4 owing to their partially developed / brownfield status.
- 4.8.4 All greenfield sites are likely to lead to urbanisation of the countryside to some extent and would have some level of adverse effect on local landscape character, although the level of adverse impact varies depending on context and existing landscape qualities, as well as the scale of development proposed. Site CSF0054 is slightly removed from the settlement boundary and development here would be considered to be discordant with the existing settlement pattern which currently comprises isolated / clusters of dwellings, farmsteads and agricultural land. Site CFS0472 is the largest of the sites in terms of potential dwelling numbers, and combined with local landscape character, is considered to potentially create significant urbanizing effects. Sites CFS0031, CFS0980 and CFS0406, whilst greenfield sites, are sites of less than 0.5ha and could be expected make a lesser contribution to urbanisation of the countryside on this basis. Sites CFS1048, CFS0472sc and HD.4 are partly located within and partly outside of Broadway's adopted settlement boundary in the SWDP and could also be expected to make a lesser contribution to urbanisation of the countryside on the basis of some degree of existing built form.
- 4.8.5 The Cotswolds (Wychavon) AONB and Environs Landscape and Visual Sensitivity Study (May 2019)³⁸ records the sensitivity of different land parcels to different scales of housing development. The landscape sensitivity parcels (Parcels B1 – B12) apply to a wider geographical area than the sites themselves, and therefore may represent different landscape characteristics and sensitivities to housing development across these wider scale units. Sites CFS0406, CFS0472, CFS0683, and a proportion of Sites CFS0563, CFS0472sc and HD.4 are located in areas of 'high' sensitivity in the Landscape and Visual Sensitivity Study. Sites CFS0031, CFS0054, CFS0563, CFS0923, CFS1048 and a proportion of Site CFS0563 are located in areas of 'high/medium' sensitivity. Sites CFS0321, CFS0979, CFS0980 and CFS1064 are located in areas of 'medium' sensitivity (landscape sensitivity parcel B2), where it has been identified in the Landscape and Sensitivity Study that there may be some limited capacity for housing development.

³⁸ White Consultants (2019) Cotswolds (Wychavon) AONB and Environs Landscape and Visual Sensitivity Study Final Report – May 2019. Available at: <https://www.swdevelopmentplan.org/swdp-review/swdp-review-evidence-base/cotswolds-and-malvern-hills-areas-of-outstanding-natural-beauty-aonb-studies> [Date Accessed: 12/05/21]

- 4.8.6 For Site CSF0472 (landscape sensitivity parcel B5) the landscape sensitivity study is considered to be representative and reflective of landscape sensitivity assessment as site CFS0472 exhibits strong pastoral qualities, tree cover, recreational usage (with high visual sensitivity³⁹) and a provides a 'green corridor' which contributes to the setting of the town and acts as a 'backcloth' the Cotswold scarp. Sites HD.4 and CFS0472sc are located in the north western edge of landscape sensitivity parcel B5 and are partly located within the existing settlement boundary. Site HD.4 contains employment units (some vacant / dilapidated), car parking, storage containers and mature and semi-mature trees. Sites HD.4 and CFS0472sc contain these forementioned features and elements of 'horsiculture' associated with Broadway Hunt which currently occupies the eastern part of the site (e.g. menage, horse walker, stables, kennels, paddocks). There are a mix of landscape qualities on Sites CSF0472sc and HD.4 (including some detractors) which may provide some capacity for housing and employment uses (with careful consideration of boundary treatments and the relationship to the wider settlement and relationship with sensitivities of landscape parcel B5 (particularly to the east).
- 4.8.7 In terms of landscape, Sites SWDP59/19 and CFS1048 are considered the best performing options, followed by sites HD.4 and CFS0472sc. Site CFS0472 is considered the worst performing option in relation to this SA objective.

³⁹ Including route of footpaths that are signposted as linking to Cotswold Way and appear well used, as well as recreational areas / playgrounds on the settlement edge.

4.9 SEA Objective 4 – Water and Flooding

Table 4.5: Impact matrix for RA sites assessed in this report pre-mitigation (Water and Flooding)

Site Reference	SEA Objective 4 – Water and Flooding			Rank
	Fluvial Flood Risk	Surface Water Flood Risk	Watercourse	
CFS0031	+	-	0	3
CFS0054	+	-	-	4
CFS0321	+	-	0	3
CFS0406	+	0	-	2
CFS0472	+	--	-	5
CFS0472sc	+	-	-	4
CFS0563	+	-	0	3
CFS0683	+	-	0	3
CFS0923	+	-	0	3
CFS0979	+	0	0	1
CFS0980	+	0	0	1
CFS1048	+	0	0	1
CFS1064	+	-	0	3
SWDP59/19	--	-	-	6
HD.4	+	-	-	4

4.9.1 Approximately half of Site SWDP59/19 is located within Flood Zone 2, and a small proportion in the northwest of the site is shown to be located within Flood Zone 3 based on EA Flood Risk Mapping (see figures at **Appendix A**). Please note the SFRA⁴⁰ does not identify any areas within Site SWDP59/19 to be located in Flood Zone 3a or 3b, however Flood Zone 2 is still recorded across approximately half of the site⁴¹. The proposed development at this site could potentially locate some site end users in areas at risk of fluvial flooding; therefore, a major negative impact would be expected.

4.9.2 Sites CFS0031, CFS0054, CFS0321, CFS0406, CFS0472, CFS0472sc, CFS0563, CFS0683, CFS0923, CFS0979, CFS0980, CFS1048, CFS1064 and HD.4 are located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at these 14 sites, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

⁴⁰ South Worcestershire Councils Level 1 Strategic Flood Risk Assessment Final Report August 2019. Available at <https://www.swdevelopmentplan.org/component/fileman/file/Documents/South%20Worcestershire%20Development%20Plan/SWDP%20Review/Evidence%20Base/SFRA/SFRA-Level-1-Final-Report-South-Worcestershire-Councils.pdf?routed=1&container=fileman-files> [Date Accessed: 20/04/21]

⁴¹ See mapping at: <http://swdp.addresscafe.com/app/exploreit/default2.aspx> [Date Accessed: 20/04/21]

- 4.9.3 A proportion of Site CFS0472 coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on pluvial flood risk, as development would be likely to locate site end users in areas at high risk of surface water flooding, as well as exacerbate pluvial flood risk in surrounding locations. A proportion of Sites CFS0563, CFS0683, CFS0923, CFS1064 and SWDP59/19 coincide with areas determined to be at low and medium risk of surface water flooding. Sites CFS0031, CFS0054, CFS0321, CFS0472sc and HD.4 coincide with areas determined to be at low risk of surface water flooding. As a result, the proposed development at these ten sites would be expected to have a minor negative impact on pluvial flood risk.
- 4.9.4 A minor watercourse runs through Site CFS0472, and the majority of Sites CFS0406, CFS0472sc and HD.4 are located within 200m of this watercourse. A large proportion of Site SWDP59/19 and a small proportion of Site CFS0054 are located within 200m of the Badsey Brook. The proposed development at these six sites could potentially increase the risk of contamination of these watercourses, and therefore a minor negative impact would be expected.
- 4.9.5 Sites CFS1048, CFS0980 and CFS0979 are considered the best performing sites under this SEA objective, with Site SWDP59/19 considered the worst performing option.

4.10 Identifying the Best Performing Option

- 4.10.1 The reasonable alternatives assessment pre-mitigation scoring matrices shows that the close spatial proximity of the 15 sites and environmental context of Broadway means that a number of sites score negatively at the 'strategic' level due to their close proximity to historic assets and / or location within a Conservation Area and location within the AONB. Some differences are however apparent between alternative locations within Broadway.

- 4.10.2 Site CFS0472 is generally considered the least preferable site option as minor to major negative effects have been identified across each of the SEA objectives (biodiversity, landscape, heritage and water and flood risk). These scorings primarily relate to the site being located within the AONB and Broadway Conservation Area, the proximity to Grade II* and Grade II Listed Buildings, and combined with the site's pastoral qualities, relatively open views, presence of recreational routes / areas and the site acting as a 'green corridor' located to the south of Broadway which contributes towards the setting of the village and Cotswold Scarp. A minor negative impact for biodiversity is recorded (prior to mitigation) owing to the site meeting the qualifying criteria of the IRZ for Broadway Hill SSSI where development proposals should be consulted on with Natural England. A proportion of Site CFS0472 coincides with areas determined to be between low, medium and high risk of surface water flooding. Whilst it is noted that some of these elements may not be prohibitive to development (or may in some instances be able to be successfully mitigated), collectively Site CFS0472 is considered to be subject to more constraints at a strategic level comparative to other site options.
- 4.10.3 Sites SWDP59/19 and CFS1048 are generally the best performing in terms of landscape and cultural heritage objectives owing to their location being separated from sensitive landscape, visual and heritage receptors (such as the AONB, Conservation Area, Listed Buildings and PRoW), combined with the location of these two sites lying within or partially within the adopted settlement boundary. Site CFS1048 is however a very small-scale site (0.33ha) and the contribution to additional housing needs of the parish is therefore anticipated to be more limited. Sites CFS0472sc and HD.4 also tend to perform relatively well in relation to landscape and cultural heritage objectives, despite being located in the Cotswolds AONB and Broadway Conservation Area, primarily due to their partial brownfield status and existing built elements; therefore, impacts on the character of the local landscape and special qualities of the AONB could be expected to be lower.
- 4.10.4 In terms of impacts on cultural heritage, Sites CFS0054, CFS0683, CFS0979, CFS1048 and SWDP59/19 would be likely to have negligible impacts on historic assets. These sites are located furthest from the Broadway Conservation Area and Listed Buildings within the village, which reduces the possibility that development at these locations would result in a significant negative impact on local heritage assets.
- 4.10.5 In terms of biodiversity, Site SWDP59/19 includes an area of land recognised as a LWS designation and Sites CFS0923, SWDP59/19 and HD.4 contain areas which are recorded as priority habitats / habitats of principle importance under Natural England datasets. These assets would therefore need to be assessed and appropriate mitigation proposals provided to ensure that biodiversity assets are protected and where possible enhanced.

- 4.10.6 In terms of water and flooding, Sites CFS0979, CFS0980 and CFS1048 have been identified as the best performing sites as none of the sites are at any risk of fluvial or pluvial flooding, nor are they located within 200m of a watercourse. Parts of Site SWDP59/19 are located within Flood Zones 2 or 3 and with areas determined to be at low and medium risk of surface water flooding. Site SWDP59/19 is therefore considered to be subject to a greater degree of flood risk constraints, compared to other sites. Site CFS0472 coincides with areas determined to be at low, medium and high risk of surface water flooding and a proportion of Sites CFS0563, CFS0683, CFS0923, CFS1064 and SWDP59/19 coincide with areas determined to be at low and medium risk of surface water flooding. Whilst it is envisaged that Sustainable Drainage Systems (SuDS) will be a requirement for all major development sites, surface water flooding may be a particular sensitivity in these areas.
- 4.10.7 The above analysis tends to indicate that those sites that are best performing in terms of landscape and cultural heritage objectives (SWDP59/19, CFS1048, HD.4 & CFS0472sc), may also be those sites that are subject to some degree of biodiversity and flood risk constraints. This assessment compares potential constraints at a strategic level. There may be potential for mitigation at these sites, secured through other policies and site design, which would need to be weighed in the planning balance and further informed by site assessments.

5 Preferred Option

5.1 The Preferred Option

5.1.1 As noted in **Chapter 4**, the PPG states that the environmental report accompanying the NDP should outline the reasons why alternatives were selected and the reasons the rejected options were not taken forward. **Table 5.1** provides a summary of this process. The reasons for site selection / rejection have been informed by the NDP Steering Group site assessment and the SEA of reasonable alternatives.

Table 5.1: Selection of reasonable alternatives

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ⁴²
HD.4	Selected	<p>This site, of approximately 2.3ha is located in the southern central area of Broadway. It lies within the Conservation Area and the Cotswold AONB, partly within and partly outside the existing development boundary. It is formed from predominantly two parcels of previously developed land, the North Cotswold Hunt [kennels, stables, paddocks, manege, huntsman's house, outbuildings and parking] and the Kennel Lane site [employment units (some dilapidated) storage containers, trees and scrub]. High quality development of this latter site, which is predominantly Brownfield, would provide the opportunity to improve visual amenity and remove the negative features identified in the Conservation Area Appraisal, which detract from both the Conservation Area and the AONB. It would at the same time provide the potential for sympathetic development of the Hunt area, thus promoting the use of previously developed land in accordance with the NPPF. The site relates well to the village with its closeness to retail, hospitality, services and bus routes.</p> <p>At present the site has a narrow, essential single lane access road which crosses a busy pedestrian pavement on the High Street. There is potential to provide a new alternative two-way access road to the site. Landscaping and replanting would be required to mitigate the relatively slight loss of habitat on the western edge. The site is relatively flat and its degree of enclosure minimises potential adverse effect on landscape and the AONB. It is wholly within Flood Zone 1.</p>
CFS0406	[Selected]	Forms part of Site HD.4 above
CFS0472sc	[Selected]	Forms part of Site HD.4 above
SWDP59/19	Selected	<p>This site of 10.99ha lies to the west of the village and lies between Station Road and Childswickham Road. It is allocated in the adopted SWDP. In addition to the proposed houses on this site there is a planned new Medical Surgery, construction of which has already begun. The site is outwith the AONB and has no effect upon the village's listed buildings or the Conservation Area. It is within the Broadway Development Boundary and has negligible impact on the landscape. In these contexts SWDP59/19 is one of the best performing in relation to these SEA objectives. Although part of the site is listed as at risk from fluvial flooding, it is considered that appropriate remediation measures could be implemented as part of the development. There is ready access to the site, it is situated on a bus route and is within walking distance of the village's shopping area.</p> <p>The site is located in proximity to the Local Wildlife Site at the Gravel Pit, which is managed by Worcester Wildlife Trust and the LWS also contains deciduous priority habitat. The LWS will be retained (with the LWS located</p>

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ⁴²
		outwith the development site) and mitigation provided in the form of planting a buffer strip, using native trees and scrub plants. Such mitigation would form part of the Development Brief for the site, as outlined in the NDP.
CFS0472	Rejected	<p>This site of 8.52ha which comprises agricultural fields lies to the east of the village, extending southwards from the High Street. Site CFS0472 is located wholly within the Cotswolds AONB and Broadway Conservation Area. The site exhibits strong pastoral qualities, recreational areas, relatively open views and provides a 'green corridor' which contributes to the setting of the town the Cotswold scarp. The position of CFS0472 although considered to have only a minor effect on local listed buildings, makes "a strong contribution to the character and qualities of the Conservation Area providing a prominent open space and significant views", both of which are readily available to local PROWs. The Landscape Sensitivity identifies the site as being of high sensitivity to housing development. Development at this site is considered likely to have a negative impact on the Cotswold AONB and create an urbanising effect on the Conservation Area.</p> <p>The site contains two proposed Local Green Spaces in the NDP LGS1: Hunt Field and LGS8: Hunt Field. The site also forms part of the 'Green Wedge' proposed within the NDP, where the site has been identified within the NDP as playing important role in both preserving the existing linear pattern of the village and a significant corridor for the movement of wildlife. For each of these reasons the NDP has not carried this site forwards.</p>
CFS0054	Rejected	<p>The site comprises an open agricultural field which is located outside of but adjacent to the Cotswold AONB and visible from the sloping ground of the AONB to the south. The site is located outside of Broadway Conservation Area and removed from the location of listed buildings. No PROW cross the site, but the site is relatively open in landscape and visual terms and development in this location would be considered to be discordant with the existing settlement pattern. The Landscape Sensitivity Assessment identifies the sensitivity parcel in which the site is located as having a medium / high sensitivity to housing development. The site was not taken forward for further consideration in the NDP due to being located on the periphery of the village, landscape considerations and the availability of more suitable alternative sites. The site is located on ALC Grade 2 land based on Natural England regional ALC mapping.</p>
CFS1048	Rejected	<p>This small site (0.33ha) lies at the west end of the village adjacent to the railway line. It is partly within the development boundary and would result in a degree of infilling. Wychavon's site assessment stated that the site looks too small to provide dwellings in character with the area and deemed it unsuitable as an allocation. For that reason it has not been carried forward for potential allocation in the SWDPR. Although the size and location of the site means there is little or no effect on biodiversity, cultural heritage or landscape, and it is outwith both the AONB and Conservation Area, development of a site here could make only a limited contribution towards the housing needs of the NDP. For these reasons the site not been taken forward in the NDP.</p>
CFS0923	Rejected	<p>The site of approximately 4ha comprises agricultural fields to the north of the existing settlement, abutting Springfield Lane, located outside but adjacent to the AONB. This narrow road is a public footpath which is a recreational resource for locals and visitors. The site contains an area of traditional orchards recorded as priority habitats / habitats of principal importance under Natural England datasets. The site is located outside of but adjacent to the Broadway Conservation Area and is not located in close proximity to any listed buildings. The Landscape Sensitivity Assessment identifies the sensitivity parcel in which the site is located as having a medium / high sensitivity to housing development. Landscape character in the vicinity of the site currently comprises small to medium sized fields, agricultural buildings and clusters of dwellings arranged in a linear settlement pattern. The inclusion of this site would lead to urbanisation of a large part of open countryside detached from the settlement area. The site is located predominantly on Grade 3 land and partly within Grade 2 land based on Natural England regional ALC mapping. The site was not taken forward for further consideration in the NDP.</p>

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ⁴²
		due to landscape considerations and the availability of more suitable alternative sites.
CFS0321	Rejected	This site comprises a large agricultural field on Grade 2 land outside the development boundary to the north of Gordon Close. A public footpath runs along the eastern boundary. The site, located within the Cotswold AONB is a part of the Green Wedge identified in the NDP. The Landscape Sensitivity Assessment notes that the site is located within an area of medium sensitivity to housing development. The southern half of CSF0321 was the subject of a planning application which was refused. The decision was appealed and subsequently dismissed by the Inspector, who cited the Green Wedge and the need to preserve it in his ruling. (Application 13/01671 & appeal 14/22115896). The dismissed appeal considered the access roads inadequate due to being very narrow and not capable of sustaining the increased traffic. This site is considered an essential component of the Green Wedge as well as for the preservation of the historical pattern of settlement that characterises this medieval village. The NDP has not taken this site forward due to landscape considerations and the availability of more suitable sites.
CFS0980	Rejected	Gordon Close is a recent development of private houses, located on a cul-de-sac to the north of the High Street. The site, comprising Grade 2 agricultural land, extends from the cul-de-sac for 0.47ha. The site is located within the Cotswolds AONB and outside but partly adjacent to Broadway Conservation Area. A public footpath runs adjacent to the eastern boundary of the site on a narrow path bound by hedgerows. The Landscape Sensitivity Assessment notes that the site is located within an area of medium sensitivity to housing development. This land has been designated in the NDP as part of the Green Wedge, preventing loss of the linear form of the village and merging of the built-up area, a consideration in keeping with the judgement in the 2015 appeal (APP/H18140/A/14/2215896) against development on an adjacent site. Although there may be a negligible effect on the site's existing biodiversity this land plays a significant role in providing a continuous corridor for wildlife into and out of the built-up village area. This land has not been carried forward for further consideration in the NDP because of landscape and environmental factors and the availability of more suitable sites.
CFS0979	Rejected	The site comprises Grade 2 agricultural land to the west of Broadway, located within the Cotswolds AONB and outside of the Broadway Conservation Area. Public footpaths run adjacent to the western and eastern boundaries of the site. The Landscape Sensitivity Assessment notes that the site is located within an area of medium sensitivity to housing development. The site also forms part of the 'Green Wedge' proposed within the NDP in order to aid preservation of green spaces jutting into the built area of Broadway, to maintain the character of the medieval layout of this historic village as well providing a green lung for the inhabitants and a corridor for wildlife. The site was not taken forward for further consideration in the NDP due to landscape considerations and the availability of more suitable alternative sites.
CFS1064	Rejected	The site is an agricultural field to the north of Broadway, bordering a new housing development on the settlement edge. The site is located within the AONB and outside of Broadway Conservation Area. A public footpath runs adjacent to the western boundary of the site on a narrow path bound by trees and hedgerows. The Landscape Sensitivity Assessment notes that the site is located within an area of medium sensitivity to housing development. The site was not taken forward for further consideration in the NDP due to landscape considerations and the availability of more suitable alternative sites. The site is located partly within Grade 3 land and partly within Grade 2 land based on Natural England regional ALC mapping. The site also forms part of a 'Local Gap' proposed within the NDP to preserve the separation between the settlements of Broadway and Willersey and local identity.

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ⁴²
CFS0031	Rejected	<p>This site comprises an agricultural field to the north of Broadway, located within the Cotswolds AONB. The Site is located outside of Broadway Conservation Area and is not crossed by any PRow. The Landscape Sensitivity Assessment notes that the site is located within an area of medium / high sensitivity to housing development. The site was not taken forward for further consideration in the NDP due to landscape considerations and the availability of more suitable alternative sites. The site is located within Grade 3 land based on Natural England regional ALC mapping.</p> <p>The site also forms part of a 'Local Gap' proposed within the NDP to preserve the separation between the settlements of Broadway and Willersey. By doing so it helps to preserve local identity.</p>
CFS0563	Rejected	<p>The site comprises agricultural land located on the eastern edge of the village and located within the Cotswolds AONB. The site is crossed by a public footpath which routes through an open field. The Landscape Sensitivity Assessment notes that the site is located within an area of high and medium / high sensitivity to housing development. The site was not taken forward for further consideration in the NDP due to landscape considerations and the availability of more suitable alternative sites. The site is located within Grade 3 land based on Natural England regional ALC mapping.</p> <p>The Site contributes to a Green Gap on the border of Broadway. It helps to preserve the separation between the settlements of Broadway and Willersey, creates a barrier from the A44 bypass and contributes to the maintenance of local identity.</p>
CFS0683	Rejected	<p>The site comprises agricultural land located on the eastern edge of the village and located within the Cotswolds AONB. The site is bordered by a public footpath which runs inside the southern boundary of the field. The Landscape Sensitivity Assessment notes that the site is located within an area of high sensitivity to housing development. The site was not taken forward for further consideration in the NDP due to landscape considerations and the availability of more suitable alternative sites. The site is located within Grade 3 land based on Natural England regional ALC mapping.</p> <p>As with site CFS0563 this site creates a barrier between the village and the A44 : contributes to the maintenance of local identity.</p>

5.2 Mitigation Considerations – Preferred Options Sites

- 5.2.1 Mitigation is discussed in **Chapter 7**. The mitigation hierarchy is a sequential process that operates in the following way: firstly, if possible, negative impacts should be avoided. Failing this, the nature of the effect should be reduced, if possible, so that it is no longer significant. If neither avoidance nor reduction is feasible, compensation measures should be considered.
- 5.2.2 Site-specific mitigation requirements will need to be determined at the project / planning level. Mitigation and enhancement strategies should be explored in full when masterplanning and designing and development. Possible site and general considerations are listed in **Table 5.1** and **Table 5.2** below.

Table 5.1: Mitigation Recommendations - Site Specific

Objective 1: Biodiversity

Parts of Sites SWDP59/19 and HD.4 contain some areas of priority habitats / habitats of principal importance and development should ideally avoid these areas in the first instance or mitigate and compensate for their loss. This also needs to be considered in the context of 'no net loss' and taking opportunities to achieve net gains under the NPPF and any mandatory net gain that may be required under the forthcoming Environment Bill and subsequent guidance once this receives Royal Assent. A Phase 1 Habitats survey is recommended to help inform baseline characteristics, development proposals and mitigation requirements.

Development at Site SWDP59/19 should consider the Local Wildlife Site and priority habitat in the overall design of the site and suitable buffers in the masterplanning for the site. The Preliminary Ecological Appraisal by Aspect Ecology in 2014⁴³ also recommended that *"To minimise potential for adverse effects on the adjacent Local Wildlife Site, it is recommended that a 'buffer zone' comprising native tree and scrub species is created along this boundary, potentially in association with open space/green infrastructure as may be required in respect of Great Crested Newts"*.

Objective 2: Cultural Heritage

The Broadway Conservation Area Appraisal indicates that Sites CFS0472sc and HD.4 contain a number of existing 'negative' influences' and this accords with observations made on the site visit in relation to some minor detrimental influences on the Conservation Area (See **Appendix D** Site Photos). There is potential for redevelopment on these sites to have a positive effect on the character and appearance of the Conservation Area, subject to land uses and design principles. Broadway Village Design Statement is provided as an Appendix to the NDP and provides guidelines for new buildings to and seeks to ensure that all developments conserves and enhances the natural, built and historic environment of the village.

For Site CFS0472sc a potential access route is shown from the High Street, with an alternative access from Church Close proposed as part of Policy HD.4. Access arrangements to Site HD.4 would be determined by a transport appraisal and consultation with the Highways Authority. Where possible (subject to access requirements) primary and secondary access routes should consider impacts on heritage assets (Broadway Conservation Area, listed buildings and Tree Preservation Orders for any envisaged routes from the High Street).

⁴³ Aspect Ecology (2014) Land at Station Road, Broadway. Preliminary Ecological Appraisal. Available at: <https://docplayer.net/178784113-Land-at-station-road-broadway-preliminary-ecological-appraisal.html> [Date Accessed: 21/04/21]

For Sites CFS0472sc and HD.4, it is uncertain the extent to which the setting of the Grade II Listed Building 'Outbuilding approximately 40m south of number 43' makes a contribution to the significance of this heritage asset. This structure sits within the curtilage of an existing residential dwelling and sits adjacent to the northern boundary of the site (See Appendix D Site Photos). The Historic England list entry⁴⁴ (reference 1215125) describes this asset as "*Outbuilding, possibly privy or dovecote. Circa 1700. Limestone rubble with pyramidal stone slate roof. On the north and west sides are openings under the eaves, each consisting of three adjacent slits. On the west side is a small square doorway with plain reveals above ground level.*" Consultation with Historic England and the Council's Conservation Officer is recommended with respect to this asset.

Objective 3: Landscape

Sites HD.4 and SWDP59/19 involves some redevelopment within the existing settlement boundaries and previously developed land and therefore responds to Para 117 of the NPPF.

Broadway Village Design Statement is provided as an Appendix to the NDP and is relevant to a number of NDP policies and strategic objectives for the built environment. This provides guidelines for new buildings to and seeks to ensure that all developments conserves and enhances the natural, built and historic environment of the village.

Retention of trees and shrubs to the west of Sites HD.4 should be considered where possible, as these contribute towards the local landscape character of the site as well the Conservation Area. In addition, boundary treatments to the east of Site HD.4 may be an important consideration – to retain the pastoral qualities and landscape character of 'green corridor' to the east of the site and popular recreational usage. This boundary is currently 'open' (save for horse fencing) and adjoined by further paddocks.

There is potential for development of Site HD.4 to enhance the visual amenity of the footpaths that surround the site – where these are bordered by low quality fencing or employment units in poor states of repair. The aesthetic qualities of these footpaths could be enhanced as part of development proposals.

Objective 4: Water and Flood Risk

The location of different infrastructure uses for 'more' and 'less' vulnerable infrastructure within the boundary for Site SWDP59/19 would need to be informed by a Flood Risk Assessment, alongside appropriate mitigation. SWDP59/19 contains land within Flood Zones 2 (and adjacent Flood Zone 3a and 3b land) which may influence the housing numbers and different land uses that can be delivered on different parts of the site. The 'Exception test' was applied in allocating this site in the SWDP⁴⁵ (See Table 7.31 in the linked footnote below), and the outputs in relation to all sources of potential flooding, including fluvial flooding should, inform the overall numbers / density of development on this site, as well as access arrangements. Easements / buffers for Badsey Brook specified by EA as well as appropriate mitigation to minimise the risk of contaminating watercourses should be applied.

⁴⁴ Historic England (2021) Outbuilding approximately 40 metres south of Number 43. Available at: <https://historicengland.org.uk/listing/the-list/list-entry/1215125> [Date Accessed: 21/04/21]

⁴⁵ South Worcestershire Strategic Flood Risk Assessment Level 2 Update Final Report (December 2012). Available at https://geosmartinfo.co.uk/wp-content/uploads/2020/03/SFRA_Update_ReportDec2012.pdf [Date Accessed: 11/05/21]

Table 5.2: Mitigation Recommendations - General

Objective 1: Biodiversity

All development to secure management and monitoring of biodiversity features on and off-site, and to consider opportunities for enhancing connectivity of the wider ecological networks associated with designated biodiversity sites.

It is recommended that policies and site-specific masterplans seek to safeguard biodiversity within the Plan area.

As a minimum, there should be no net loss to the biodiversity network, the species diversity or habitat diversity. Emerging government policy on net gain is likely to see a commitment to at least a 10% gain in biodiversity, measured using the biodiversity metric⁴⁶ once the Environment Bill receives Royal Assent.

Objective 2: Cultural Heritage

Where there is potential for development to adversely affect a heritage asset, including the setting of that asset, an assessment should be undertaken to establish the extent of this potential effect as per guidelines provided by Historic England⁴⁷. Historic England have also produced specific advice on rural planning⁴⁸ and guidance on the management of Conservation Areas⁴⁹.

Where possible development should consider sensitive design around existing cultural assets and maintain the setting of such assets, including the use of screening (where appropriate).

It is also recommended that, where the opportunity exists, proposals should seek to increase the local awareness of cultural heritage assets in the local area.

Objective 3: Landscape

As Broadway is partially within the Cotswolds AONB, development proposals should be carefully considered and planned in terms of scale, nature and design. Development proposals in Broadway should consider these suggestions and adhere to policies set out in the Cotswolds Management Plan 2018 – 2023⁵⁰ and Position Statements⁵¹, including development in the setting of the Cotswolds AONB (updated June 2016).

Landscaping proposals should include the use locally important native tree and hedge species and be guided by the relevant Landscape Character Assessments. Where screening is considered appropriate, guidelines for species selection and conditions for screening foliage are provided by the Royal Horticultural Society⁵².

⁴⁶ Defra (2020) Environment Bill 2019-21: Bill 220 2019-21 (as amended in Committee). Available at: <https://services.parliament.uk/bills/2019-21/environment.html> [Date Accessed: 08/02/21]

⁴⁷ Historic England (2017) The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3. Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date Accessed: 20/04/21]

⁴⁸ Historic England (2021) Rural Planning. Available at: <https://historicengland.org.uk/advice/planning/rural-planning/> [Date Accessed: 20/04/21]

⁴⁹ Historic England (2021) Designating and Managing a Conservation Area. Available at: <https://historicengland.org.uk/advice/planning/conservation-areas/> [Date Accessed: 20/04/21]

⁵⁰ Cotswolds Conservation Board (2018) Cotswolds AONB Management Plan. Available at: <https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/> [Date Accessed: 12/05/21]

⁵¹ Position statements on key issues affecting the AONB. Available at <https://www.cotswoldsaonb.org.uk/our-landscape/position-statements-2/>

⁵² Royal Horticultural Society (2017) Plants for Screening. Available at: <https://www.rhs.org.uk/advice/profile?PID=636> [Date Accessed: 20/04/21]

Objective 4: Water and Flood Risk

The permeability of soil reduces as compaction increases. It is therefore recommended that construction workers adopt best practice measures to avoid the compaction of soils and exacerbating surface water flood risk during construction⁵³.

Mitigation measures should be informed by the Strategic Flood Risk Assessment and site-specific Flood Risk Assessments (as appropriate). A site-specific Flood Risk Assessment will be required for any development in Flood Zone 2, or for sites greater than 1ha in Flood Zone 1.

Opportunities to incorporate Sustainable Urban Drainage Systems (SuDS) into future development should be sought in order to increase natural infiltration rates, reduce surface water run-off, reduce flood risk and improve water quality. SuDS should be incorporated with green infrastructure where possible.

⁵³ DEFRA (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Available at: <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites> [Date Accessed: 11/05/21]

6 Assessment of Policy Effects Pre-Mitigation

6.1 Introduction

- 6.1.1 The NDP aims to achieve a balance between conserving Broadway's valued landscapes and heritage assets whilst securing the necessary infrastructure to support development and housing and employment needs in the parish.
- 6.1.2 The NDP sets out a series of 34 policies, including one mixed use housing and employment site allocation that aim to support the delivery of the vision for Broadway Parish.
- 6.1.3 The 34 policies that form the Broadway NDP (**Table 6.1**) have been individually assessed against each of the four SEA Objectives contained within the SEA Framework (**Appendix C**). This chapter contains the results of these assessments.

Table 6.1: Draft Broadway NDP policies

Policy	Policy Name
Future Housing and Development (HD)	
Policy HD.1	Development Boundary and Infill
Policy HD.2	Use of Garden Land
Policy HD.3	Use of Brownfield Land
Policy HD.4	Site Allocation Land off Kennel Lane / Church Close
Policy HD.5	Rural Exception Housing and Affordable Homes
Policy HD.6	Local Gaps
Policy HD.7	Housing Mix
Policy HD.8	Pedestrian Access to Amenities
Built Environment (BE)	
Policy BE.1	Design Principles
Policy BE.2	Masterplans
Policy BE.3	Designing Out Crime
Policy BE.4	Heritage Assets
Policy BE.5	Replacement Dwellings
Policy BE.6	Extensions and Conversions
Policy BE.7	Energy Efficiency and Renewable Energy
Policy BE.8	Creating a Strong Sense of Place
Natural Environment (NE)	
Policy NE.1	Trees, Woodlands and Hedgerows
Policy NE.2	Valued Landscapes, Vistas and Skylines
Policy NE.3	Local Green Spaces
Policy NE.4	Green Wedge
Policy NE.5	Highway Verges and Adjacent Areas
Policy NE.6	Protect and Enhance Biodiversity and the Natural Environment
Policy NE.7	Flooding

Policy	Policy Name
Policy NE.8	Foul Water Drainage Mitigation
Policy NE.9	Polytunnels
Policy NE.10	Tranquillity and Dark Skies
Local Economy and Tourism (LET)	
Policy LET.1	Retail – Development, Redevelopment and Change of Use
Policy LET.2	Shop Signage
Policy LET.3	Rural and Agricultural Business
Policy LET.4	Camping and Caravan Sites
Policy LET.5	Broadband
Community (COM)	
Policy COM.1	Community Assets and Amenities
Policy COM.2	Cycling and Walking
Policy COM.3	Allotment and Growing Space

6.1.4 The impact matrices for all policy assessments are presented in **Table 6.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix E**, as well as the topic-specific methodologies and assumptions presented in **Table 3.2**. It should be noted that this assessment has been undertaken before the consideration of mitigation. Mitigation is outlined in **Chapter 7**.

Table 6.2: SEA impact matrix for policies assessed in this report (pre-mitigation)

Policy Reference	1	2	3	4
	Biodiversity	Cultural Heritage	Landscape	Water and Flooding
HD.1	0	0	+	0
HD.2	0	0	0	0
HD.3	+	+	+	0
HD.4	-	+/-	-	-
HD.5	-	-	-	0
HD.6	0	0	+	0
HD.7	0	0	0	0
HD.8	0	0	0	0
BE.1	+	+	+	0
BE.2	0	0	+	0
BE.3	0	0	0	0
BE.4	0	+	+	0
BE.5	0	0	0	0
BE.6	0	0	0	0
BE.7	0	0	0	+
BE.8	0	+	+	0
NE.1	+	0	+	+
NE.2	0	+	+	0
NE.3	+	+	+	+
NE.4	+	+	+	0
NE.5	+	0	+	0

Policy Reference	1	2	3	4
	Biodiversity	Cultural Heritage	Landscape	Water and Flooding
NE.6	+	0	+	+
NE.7	+	0	0	+
NE.8	+	0	0	+
NE.9	0	0	0	0
NE.10	0	0	+	0
LET.1	0	0	+	0
LET.2	0	+	+	0
LET.3	0	0	0	0
LET.4	0	0	0	0
LET.5	0	0	0	0
COM.1	+	+	0	0
COM.2	0	0	0	0
COM.3	+	0	0	0

6.1.5 This SEA report identifies that the NDP policies would not be likely to lead to any major adverse effects in relation to biodiversity, cultural heritage, landscape, flooding or water resources. The NDP policies would lead to minor beneficial effects across one or more of the SEA objectives for 19 policies contained within the NDP.

6.1.6 Minor adverse effects have been identified for two policies pre-mitigation (HD.4 and HD.5), which primarily relate to sites lying within open countryside (HD.5), or partly within the settlement boundary (HD.4), alongside consideration of landscape and heritage designations and other environmental features within the Broadway NDP area.

7 Mitigation and Residual Effects

7.1 Introduction

7.1.1 Minor adverse environmental effects have been identified on the SEA objectives for Policies HD.4 and HD.5 which primarily relate to these sites lying within open countryside (HD.5), or partly within the settlement boundary (HD.4), alongside the characteristics of the NDP area in terms of designated landscape and heritage assets and other environmental features. Mitigation has therefore been explored for these policies through the application of the mitigation hierarchy approach (see **Section 3.10**). Following consideration of mitigation and enhancement measures, the residual effects of the proposals in the plan have been identified.

7.2 Mitigating impact of the NDP policies

7.2.1 Adverse impacts on SEA objectives caused by development proposed within policies HD.4 and HD.5 will be mitigated to some extent by various other proposals within the Plan. These mitigating policies are set out in **Table 7.1** below.

Table 7.1 Post mitigation assessment of NDP policies

Policy Reference	1	2	3	4
	Biodiversity	Cultural Heritage	Landscape	Water and Flooding
HD.4	0	+	+	0
Mitigating effect	<p>Landscape features and visual amenity (AONB, valued landscapes, local landscape character, views from and towards Broadway and views from sensitive visual receptors such as PRow users, residents and visitors to the AONB): The policies and the design principles in Policies BE.1 (Design Principles), BE.2 (Master Plans), BE.8 (Creating a Strong Sense of Place), HD.3 (Use of Brownfield Land), NE.1 (Trees and Hedgerows), NE.2 (Valued Landscapes, Vistas and Skylines), NE.3 (Local Green Spaces), NE.6 (Protect and Enhance Biodiversity and the Natural Environment), and NE.10 (Tranquility and Dark Skies) will help to ensure that the local landscape character, and natural beauty and scenic qualities of the AONB are protected.</p> <p>Biodiversity: Policy NE.1 (Trees and Hedgerows) and NE.6 (Protect and Enhance Biodiversity and the Natural Environment) will help to project biodiversity.</p> <p>Setting of heritage assets (Broadway Conservation Area and Listed Buildings): Policy BE.1 (Design principles) and Policy BE.4 (Heritage Assets) will help to ensure that the character and appearance of the conservation area and setting of historic assets is preserved.</p> <p>Water resources and flooding: Policies NE.7 (Flooding) and BE.7 (Energy Efficiency and Renewable Energy) will ensure that development adequately considers pluvial flood risk incorporating features such as SuDS, with Policy NE.8 (Foul Water Drainage) providing mechanisms in relation to foul water.</p>			
HD.5	0	0	0	0

Mitigating effect	<p>Landscape features and visual amenity (AONB, valued landscapes, local landscape character, views from and towards Broadway and views from sensitive visual receptors such as PRoW users, residents and visitors to the AONB): The policies and the design principles in Policies BE.1 (Design Principles), BE.2 (Master Plans), BE.8 (Creating a Strong Sense of Place), NE.1 (Trees and Hedgerows), NE.2 (Valued Landscapes, Vistas and Skylines), NE.3 (Local Green Spaces), NE.4 (Green Wedge), NE.6 (Protect and Enhance Biodiversity and the Natural Environment), and NE.10 (Tranquility and Dark Skies) will help to ensure that the local landscape character, natural beauty and scenic qualities of the AONB are protected.</p> <p>Biodiversity: Policy NE.1 (Trees and Hedgerows) and NE.6 (Protect and Enhance Biodiversity and the Natural Environment) will help to project biodiversity.</p> <p>Setting of heritage assets (Broadway Conservation Area and Listed Buildings): Policy BE.1 (Design principles) and Policy BE.4 (Heritage Assets) will help to ensure that the character and appearance of the Conservation Area and setting of historic assets is preserved.</p>
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7.3 Residual effects

- 7.3.1 Following the implementation of mitigation set out in the policies of the NDP it can be concluded that the Plan will have a long term negligible or positive impacts on each of the SEA objectives as set out in **Table 7.1**.

7.4 Summary of post mitigation effects

- 7.4.1 Assessment of the NDP following consideration of mitigation proposed within the Plan did not identify any negative residual (or post-mitigation) effects on the biodiversity, cultural heritage, landscape or water and flooding SEA objectives. All residual effects were considered to be negligible or positive.
- 7.4.2 **Table 7.1** below provides a summary of anticipated likely effects of the NDP following the implementation of mitigation and enhancement measures.

Table 7.1: SEA impact matrix for policies assessed in this report (post-mitigation)

Policy Reference	1	2	3	4
	Biodiversity	Cultural Heritage	Landscape	Water and Flooding
HD.1	0	0	+	0
HD.2	0	0	0	0
HD.3	+	+	+	0
HD.4	0	+	+	0
HD.5	0	0	0	0
HD.6	0	0	+	0
HD.7	0	0	0	0
HD.8	0	0	0	0
BE.1	+	+	+	0
BE.2	0	0	+	0

Policy Reference	1	2	3	4
	Biodiversity	Cultural Heritage	Landscape	Water and Flooding
BE.3	0	0	0	0
BE.4	0	+	+	0
BE.5	0	0	0	0
BE.6	0	0	0	0
BE.7	0	0	0	+
BE.8	0	+	+	0
NE.1	+	0	+	+
NE.2	0	+	+	0
NE.3	+	+	+	+
NE.4	+	+	+	0
NE.5	+	0	+	0
NE.6	+	0	+	+
NE.7	+	0	0	+
NE.8	+	0	0	+
NE.9	0	0	0	0
NE.10	0	0	+	0
LET.1	0	0	+	0
LET.2	0	+	+	0
LET.3	0	0	0	0
LET.4	0	0	0	0
LET.5	0	0	0	0
COM.1	+	+	0	0
COM.2	0	0	0	0
COM.3	+	0	0	0

7.4.3 The NDP, as a whole, sets out provisions to help limit the effects of new development on landscape features, heritage resources, biodiversity assets and the water environment. Collectively the policies in the NDP demonstrate a proactive and evidenced approach to protecting and enhancing the natural and historic environment, including a strong impetus on local green spaces, local gaps, valued views / landscapes and the provision of a Village Design Guide which would help to ensure that development is in keeping with local character and identity within the NDP area. The NDP policies would be likely to secure a number of sustainability benefits across each of the SEA objectives, compared to the baseline scenario without the NDP in place.

8 Monitoring

8.1 Monitoring proposals

- 8.1.1 The SEA Directive states that “*member states shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action*” (Article 10.1).
- 8.1.2 The ER should also provide information on a “*description of the measures envisaged concerning monitoring*” (Annex I (i)). This represents Stage F of the process, according to the MHCLG (2015) Guidance on SEA for Neighbourhood Plans.
- 8.1.3 The monitoring requirements typically associated with the SEA process are recognised as placing heavy demands on authorities with SEA responsibilities. For this reason, the proposed monitoring framework should focus on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.
- 8.1.4 The purpose of monitoring is to measure the environmental effects of a plan, as well as to measure success against the plan’s objectives. It is therefore beneficial if the monitoring strategy builds on monitoring systems that are already in place. It should also be noted that monitoring could provide useful information for future plans and programmes.
- 8.1.5 Monitoring is particularly useful in answering the following questions:
- Were the assessment’s predictions of sustainability effects accurate?
 - Does the NDP contribute to the achievement of desired sustainability objectives?
 - Are mitigation measures performing as well as expected?
 - Are there any unforeseen adverse effects? Are these within acceptable limits, or is remedial action required?
- 8.1.6 The SEA guidance suggests that SEA monitoring and reporting activities can be integrated into the regular planning cycle. As part of the monitoring process, the joint authorities (Malvern Hills District Council, Worcester City Council and Wychavon District Council) for the SWDP are required to prepare Annual Monitoring Reports⁵⁴. It is anticipated that elements of the SEA monitoring programme for the NDP could be incorporated into these processes. The monitoring targets will be informed by the SEA Framework and its indicators (see **Appendix C**) and the South Worcestershire Development Plan Monitoring Framework.

⁵⁴ Available at <https://www.swdevelopmentplan.org/publications/monitoring-reports> [Date Accessed: 10/05/21].

- 8.1.7 Whilst the SEA process has not identified any significant negative effects associated with the NDP it is considered that monitoring may be beneficial to ensure the successful implementation of recommended mitigation and enhancement measures set out within its policies. The areas specified for monitoring therefore include the following:
- Assessment of planning applications that affect designated historic assets.
 - Assessment of planning applications that involve the loss of a non-designated historic features.
 - Production of Conservation Area Appraisals and Management Plans.
 - Schemes providing public access to or interpretation of an historic asset.
 - Assessment of development proposals incorporating landscaping schemes to mitigate the impact of development or provide enhancement, focusing on areas of landscape sensitivity on the edges of settlements.
 - Assessment of development proposals providing a net gain in biodiversity.
 - Assessment of the justification for granting planning permissions for large-scale development proposals within or close to the AONB.
 - Number of planning applications incorporating SuDS.
- 8.1.8 Details of any monitoring programme are, at this stage, preliminary and may evolve over time based on the results of consultation and the identification of additional data sources (as in some cases information will be provided by outside bodies). The monitoring of individual schemes/proposals should also be addressed at project level.

9 Conclusions and Next Steps

9.1 Environmental Report

9.1.1 This document constitutes an Environmental Report for the purposes of the SEA Directive, in order to:

- Provide an outline of the contents and main objectives of the NDP and its relationship with other relevant plans;
- Consider the environmental protection objectives established at international, national or community level and how these objectives are relevant to the NDP;
- Assess the likely significant effects on the environment caused by the NDP (including biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, and cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors);
- Give details of the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the NDP;
- Give an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information; and
- Include a description of the measures envisaged concerning monitoring.

9.1.2 Assessment of policies within the NDP identified negligible and positive residual effects on the SEA objectives.

9.2 Next Steps

9.2.1 This Environmental Report will be subject to consultation with the statutory bodies and available for inspection by the public.

9.2.2 The Submission Plan will be submitted to the local planning authority, Wychavon District Council. Once the District Council is satisfied that the NDP complies with all statutory requirements, then it will be published for consultation for a minimum of six weeks, in particular inviting representations from any consultation body referred to in the consultation statement. When the responses have been received these will be sent, together with the NDP, to an independent examiner who will test whether or not the plan meets the basic conditions⁵⁵.

⁵⁵ Town and Country Planning Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/8/contents> [Date Accessed: 11/05/21]

- 9.2.3 Formal representations made through the consultation process will be submitted to the Examiner of Neighbourhood Plans alongside the draft NDP and this SEA Report. This represents Stage E of the SEA, according to the MHCLG (2015) guidance. If the examiner of Neighbourhood Plans is satisfied that the basic conditions have been met, the NDP will be subject to local referendum. If over 50% of votes at the referendum are in favour of the NDP, the NDP will become adopted as part of the statutory development plan.
- 9.2.4 SEA Regulations 16.3c) (iii) and 16.4 require that a 'statement' be made available to accompany the plan, as soon as possible after the adoption of the plan or programme, known as a post-adoption statement. The purpose of the SEA statement is to outline how the SEA process has influenced and informed the NDP development process and demonstrate how consultation on the SEA has been taken into account.
- 9.2.5 As the regulations outline, the statement should contain the following information:
- The reasons for choosing the preferred policies for the NDP as adopted in the light of other reasonable alternatives dealt with;
 - How environmental considerations have been integrated into the NDP;
 - How consultation responses have been taken into account; and
 - Measures that are to be taken to monitor the significant environmental effects of the NDP.
- 9.2.6 To meet these requirements, following any further changes before adoption, a Post Adoption Statement will be published with the adopted version of the NDP.

9.3 Commenting on the Environmental Report

- 9.3.1 Any comments on this SEA Report should be directed through Wychavon District Council.

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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