

## Cabinet

**Thursday, 23 November 2023, 10.00 am, Lakeview Room,  
County Hall**

### Membership

#### Councillors:

Cllr Simon Geraghty (Chairman), Cllr Marc Bayliss, Cllr Adrian Hardman, Cllr Marcus Hart (Vice Chairman), Cllr Adam Kent, Cllr Steve Mackay, Cllr Karen May, Cllr Richard Morris, Cllr Tracey Onslow and Cllr Mike Rouse

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All the above reports and supporting information can be accessed via the Council's website [here](#)

Date of Issue: Wednesday, 15 November 2023

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# Project Screening

## Impact Assessment Id: #580

### 1. Your Details

**Name of person completing screening assessment**

Cody Levine

**Job Title**

Team Leader (Ecology)

**Directorate**

Economy &amp; Infrastructure

**Service Area**

Major Projects &amp; Waste

**Email Address**

CLevine@worcestershire.gov.uk

**Connection to project (e.g. project manager)**

Project Manager

### 2. Project Summary

For the purposes of the impact assessment screening, we will refer to the activity or area being assessed as a project.

**Project Name**

Local Nature Recovery Strategy (LNRS)

**Name of Project Sponsor**

Emily Barker

**Name of Project Manager**

Cody Levine

**Name of Project Lead**

Cody Levine

**Project Reference (if known)****Please give a brief description of the project**

LNRS are a statutory requirement from the Environment Act requiring the Secretary of State to appoint Responsible Authorities (WCC in the case of Worcestershire) to collaborate with the public and Supporting Authorities in production of a spatial plan for nature's recovery, establishing local priorities and locations for conservation and enhancement action which will also help deliver wider environmental benefits.

### 3. Data Protection

**We need to establish if the proposal involves processing personal data. Personal data is information that relates to an identified or identifiable individual.**

**Name of Information Asset Owner**

Rachel Hill

Senior officer responsible for the project's information assets

**Does the project, any project work stream or project outcome involve any personal data? Some examples of personal data are given below.** Yes

**Appearance:**

photograph, physical description

**Basic Identifiers:**

name, date of birth, age, biometric data, ethnic origin, gender, genetic data, race, sex

**Contact Details:**

address, email address, home phone number, mobile phone number, postcode

**ID Number:**

National Insurance Number, driving licence number, NHS number, online identifier, other general identifier

**Employment:**

work related training/awards

**Financial:**

income/financial/tax situation

**Lifestyle:**

health or social care, living habits, marital status, philosophical beliefs, political opinions, religion, sex life, trade union membership

**Technology:**

login/username, device MAC address (wireless network interface), device IMEI number, IP Address, location data (travel/GDPS/GSM data), website cookies

**Does the project, any project work stream or project outcome involve:****Evaluating or scoring individuals (including profiling and predicting)? No**

e.g. building behavioural or marketing profiles of individuals based on their web activity

**Profiling, automated decision-making or special category data to help make decisions on access to a service, opportunity or benefit, or otherwise have a significant effect on an individual? Yes**

e.g. asking an individual to submit personal data that is then analysed by a computer system, with the result that the individual's request to use a service is either accepted or refused.

**Systematic monitoring? No**

e.g. installing a CCTV or ANPR system on council premises, or any covert surveillance including anything under RIPA.

**Processing of 'special category' personal data (or 'sensitive personal data')? No**

e.g. processing health or social care data.

**Processing personal data on a large scale? No**

e.g. implementing a new social care record system.

**Datasets that involve combining, comparing, or matching data from multiple sources? No**

e.g. matching or merging service users' personal data against or with personal data held by a third party (e.g. the NHS).

**The personal data of vulnerable people? No**

e.g. processing children's personal data or social service client's data.

**The use or application of innovative technological or organisational solutions? No**

e.g. using fingerprint recognition technology to control access to a building.

**The transfer of personal data outside of the European Union? No**

e.g. storing personal data in a cloud service hosted in the US or using a third party that uses technology hosted in the US.

**Preventing individuals from exercising a right or using a service or contract? No**

e.g. screening applicants before allowing them to use a web service.

**Processing personal data that could result in a risk of physical harm in the event of a security breach? No****The use of third parties? Yes**

e.g. as a service provider or hosted service

**Processing children's data for profiling, automated decision-making, any marketing purposes, or to offer any online services directly to them? Yes**

e.g. apps designed for use by children

## 4. Equality

**We need to determine whether the project could affect residents and/or Council staff because they share any of the Protected Characteristics defined in the Equality Act 2010 namely Age, Disability, Gender Reassignment, Marriage/Civil Partnership, Pregnancy, Race, Religion/Belief, Sex and Sexual Orientation.**

**Does the project relate to an area where data/research indicates that inequalities are already known to exist? Unsure**

**Could this project have any effect on, service delivery or usage, other aspects of daily life or community participation levels for people because they belong to any of the groups below?**

**Age No**

e.g. a person belonging to a particular age group (for example 18 – 30-year olds).

**Disability No**

e.g. A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

**Gender Re-Assignment No**

e.g. The process of transitioning from one gender to another.

**Marriage/Civil Partnership Status No**

e.g. Marriage is a union between a man and a woman or between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).

**Pregnancy/Maternity No**

e.g. Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

**Race No**

e.g. Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

**Religion or Belief No**

e.g. Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

**Sex No**

**Sexual Orientation No**

e.g. Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

**Health Inequalities No**

e.g. Any preventable, unfair & unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental & economic conditions within societies.

## 5. Public Health

We also want to understand if the project will have any impacts on public health.

The social, economic, cultural and physical environment in which people live their lives has a significant effect on their health and wellbeing. Although genetics and personal behaviour play a strong part in determining an individual's health, good health starts where we live, where we work and learn, and where we play.

Improving public health requires taking a broader view of the conditions that create health and wellbeing, from how we plan and develop our urban spaces and places, to the opportunities for employment, recreation, and social connection available to all who live in them.

Health inequalities are the preventable, unfair and unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental and economic conditions within societies, which determine the risk of people getting ill, their ability to prevent sickness, or opportunities to take action and access treatment when ill health occurs.

### Could the project have an impact on any of the following factors?

#### **Social and Economic No**

e.g. culture, social support (neighbourliness, social networks/isolation), spiritual participation, employment opportunities.

#### **Physical Health Yes**

e.g. physical activity is expected to increase, influenza vaccination uptake increase

#### **Mental Health & Wellbeing Yes**

e.g. benefits to children's mental health, benefits to adult carer wellbeing.

#### **Access to Services No**

e.g. access to (location/disabled access/costs) and quality of primary/community/secondary health care, child care, social services, housing/leisure/social security services; public transport, policing, other health relevant public services, non-statutory agencies and services.

## 5. Environmental Sustainability

We want to understand if the project activity and project outcomes will have an impact on environmental sustainability. Please be mindful that the Council has committed to reduce its emissions to net-zero by 2050 and most projects are likely to have an impact on this target. This should be a key consideration in your project delivery and should be reviewed when completing these screening documents.

### Could this project have an impact on the categories listed below?

**Greenhouse Gas (GHG) Emissions (including CO2) No**

e.g. increased GHG emissions as a result of project implementation, which may also be linked with efficient use of resources in WCC buildings; transport; emissions from waste; and procurement.

**Efficient Use of Resources No**

e.g. consumption of energy resources, water, electricity, gas and heating fuels.

**Transport No**

e.g. number of people travelling, alternative transport modes.

**Waste No**

e.g. increase in waste generated or an increase in waste recycling.

**Wildlife and Biodiversity Yes**

e.g. impacts on the natural environment or enhancements to the natural environment.

N.B. This refers to any direct or indirect modifications to landholdings, including but not limited to removal of vegetation, alteration or demolition of buildings or modification of watercourses or lighting (not limited to just green space/trees).

**Pollution to Land or Water No**

e.g. risk of pollution to the local environment.

**Pollution to Air No**

e.g. risk of pollution to air, activity which may adversely affect air quality or increase emissions to air

**Resilience to climate change No**

e.g. risks of extreme weather and climate impacts on the project.

**Historic Environment No**

e.g. impacts on Historic Environment or enhancements of the Historic Environment.

**Procurement No**

e.g. could procurement associated with the project result in an increase of natural resources (such as long-distance shipping of goods); could use be made of local resources or work forces to support delivery of the project.

## 7. Results of Screening

<b>Data Protection</b>	Will require a full impact assessment
<b>Equality and Public Health</b>	Will require a full impact assessment
<b>Environmental Sustainability</b>	Will require a full impact assessment

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# Equality and Public Health Impact Assessment: Local Nature Recovery Strategy (LNRS)

Impact Assessment Id: #580

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## 1.0 Screening Information

### Project Name

Local Nature Recovery Strategy (LNRS)

### Name of Project Sponsor

Emily Barker

### Name of Project Manager

Cody Levine

### Name of Project Lead

Cody Levine

### Please give a brief description of the project

LNRS are a statutory requirement from the Environment Act requiring the Secretary of State to appoint Responsible Authorities (WCC in the case of Worcestershire) to collaborate with the public and Supporting Authorities in production of a spatial plan for nature's recovery, establishing local priorities and locations for conservation and enhancement action which will also help deliver wider environmental benefits.

### Data Protection screening result

Will require a full impact assessment

### Equality and Public Health screening result

Will require a full impact assessment

### Environmental Sustainability screening result

Will require a full impact assessment

## 1.1 Background and Purpose

Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document.

LNRS are a statutory requirement from the Environment Act requiring the Secretary of State to appoint Responsible Authorities (WCC in the case of Worcestershire) to collaborate with the public and Supporting Authorities in production of a spatial plan for nature's recovery, establishing local priorities and locations for conservation and enhancement action which will also help deliver wider environmental benefits.

### **Upload Business Case or Support documents**

No files uploaded

### **Project Outputs**

Briefly summarise the activities needed to achieve the project outcomes.

Public consultation on a Statement of Biodiversity Priorities and Local Habitat Map setting out how and where Worcestershire will achieve nature's recovery

### **Project Outcomes**

Briefly summarise what the project will achieve.

The LNRS, once adopted, will help influence land-use decision making, for example helping spatially focus Biodiversity Net Gain offsets and Environmental Stewardships.

### **Is the project a new function/service or does it relate to an existing Council function/service?**

New

### **Was consultation carried out on this project?**

No

## **1.2 Responsibility**

### **Directorate/Organisation**

Economy & Infrastructure

### **Service Area**

Major Projects & Waste

## **1.3 Specifics**

### **Project Reference (if known)**

LNRS

### **Intended Project Close Date \***

March 2025

## **1.4 Project Part of a Strategic Programme**

**Is this project part of a strategic programme?**

No

## **2 Organisations Involved**

**Please identify the organisation(s) involved:**

**Worcestershire County Council**

**Details of contributors to this assessment:**

<b>Name</b>	Cody Levine
<b>Job title</b>	Team Leader (Ecology)
<b>Email address</b>	clevine@worcestershire.gov.uk

### **3.0 Who will be affected by the development and implementation**

**Please identify group(s) involved:**

**Communities**

### **3.1 Information and evidence reviewed**

**What information and evidence have you reviewed to help inform this assessment? \***

to be confirmed on receipt of consultation responses once permission to consult is obtained from WCC Cabinet, for which, a completed JIA is required.

### **3.2 Summary of engagement or consultation undertaken**

**Who and how have you engaged, or why do you believe engagement is not required? \***

As part of the strategy's development we intend to seek WCC permission to undertake an initial 'LNRS Issues and Options' public consultation, to be followed by a public consultation on a 'draft LNRS' once consultation responses can be analyzed and integrated into the emerging strategy. Consultation work is provisionally scheduled in Q1 and Q4 2024.

### **3.3 Summary of relevant findings**

## Please summarise your relevant findings. \*

to be confirmed

## 4 Protected characteristics - Equality

Please consider the potential impact of this activity (during development & implementation) on each of the equality groups outlined below. **Please select one or more impact box(es) below for each equality group and explain your rationale.** Please note it is possible for the potential impact to be both positive and negative for the same equality group and this should be recorded. Remember to consider the impact on e.g. staff, public, patients, carers etc. who are part of these equality groups.

### Age

Potential neutral impact selected.

#### Explanation of your reasoning:

The consultation will actively encourage participation from all age groups. Various methods of consultation and engagement will ensure we receive feedback from a broad range of demographics, including all age groups. We will aim to ask and capture demographic data information for the purpose of supporting our due regard to the protected characteristic of age, as per our statutory duties.

### Disability

Potential positive impact selected. Potential neutral impact selected. Potential negative impact selected.

#### Explanation of your reasoning:

The consultation will actively encourage participation from disabled residents and community members. Various methods of consultation and engagement will ensure we receive feedback from a broad range of demographics, including from those who are disabled, those who are impacted directly or indirectly. The consultation survey and any relevant documentation will be available in a number of accessible formats, allowing engagement from those who use a screen reader, those who use 'easy read', and at public consultation sessions, a BSL translator can be requested. We will aim to ask and capture demographic data information for the purpose of supporting our due regard to the protected characteristic of disability as per our statutory duties. Potential positive and negative impact based on our successful or accessible engagement during consultation – unknown until consultation completion, but measures will be in place to mitigate any negative impacts faced due to disability.

### Gender reassignment

Potential neutral impact selected

#### Explanation of your reasoning:

The consultation will actively encourage participation from all residents and community members. Various methods of consultation and engagement will ensure we receive feedback from a broad range of demographics, including individuals or groups who have transitioned, who are planning to transition, who are transitioning, and those who are not.

We will aim to ask and capture demographic data information for the purpose of supporting our due regard to the protected characteristic of gender reassignment, as per our statutory duties.

## **Marriage and civil partnerships**

Potential neutral impact selected.

### **Explanation of your reasoning:**

neutral no impact known with regards to this protected characteristic.

## **Pregnancy and maternity**

Potential positive impact selected. Potential neutral impact selected. Potential negative impact selected.

### **Explanation of your reasoning:**

The consultation will actively encourage participation from all residents and community members. Various methods of consultation and engagement will ensure we receive feedback from a broad range of demographics, including those who have given birth within the last 6 months, and those who are pregnant. We will aim to ask and capture demographic data information for the purpose of supporting our due regard to the protected characteristic of pregnancy and maternity, as per our statutory duties. Potential positive and negative impact based on our successful or accessible engagement during consultation – unknown until consultation completion, but measures will be in place to mitigate any negative impacts faced due to pregnancy or maternity status (eg access to physical spaces where meetings may be held re consultation).

## **Race including travelling communities**

Potential neutral impact selected.

### **Explanation of your reasoning:**

**The consultation will actively encourage participation from all residents and community members. Various methods of consultation and engagement will ensure we receive feedback from a broad range of demographics. We will aim to ask and capture demographic data information for the purpose of supporting our due regard to the protected characteristic of race, as per our statutory duties.**

## **Religion and belief**

Potential neutral impact selected.

### **Explanation of your reasoning:**

The consultation will actively encourage participation from all residents and community members. Various methods of consultation and engagement will ensure we receive feedback from a broad range of demographics, including individuals or groups who practice or belong to a specific religious group, as well and those who don't. We will aim to ask and capture demographic data information for the purpose of supporting our due regard to the protected characteristic of religion and belief, as per our statutory duties.

## **Sex**

Potential neutral impact selected.

**Explanation of your reasoning:**

The consultation will actively encourage participation from all residents and community members. Various methods of consultation and engagement will ensure we receive feedback from a broad range of demographics, including individuals or groups of all sexes. We will aim to ask and capture demographic data information for the purpose of supporting our due regard to the protected characteristic of sex, as per our statutory duties.

**Sexual orientation**

Potential neutral impact selected.

**Explanation of your reasoning:**

The consultation will actively encourage participation from all residents and community members. Various methods of consultation and engagement will ensure we receive feedback from a broad range of demographics, including individuals or groups who have, share or do not share specific sexual orientations. We will aim to ask and capture demographic data information for the purpose of supporting our due regard to the protected characteristic of sexual orientation, as per our statutory duties.

## 5 Characteristics - Public Health

**Other vulnerable and disadvantaged groups**

Potential neutral impact selected.

**Explanation of your reasoning:**

The element of the project which is being proposed to Cabinet in 2024 is an 'LNRS Issues and Options' public consultation. The outcomes of this consultation will inform development of our future LNRS. The Issues and Options consultation will not result in outputs which produce a tangible change or direct or indirect effect on our residents, communities or businesses, including any vulnerable or disadvantaged group. A stakeholder engagement plan is currently in preparation, and will comply with guidance recently produced by Government and DEFRA. The Issues and Options consultation will capture some stakeholder's personal information, including personal data such as age and location. Along with the stakeholder engagement plan, this data will allow us to evaluate how well WCC is reaching groups defined by DEFRA as 'harder to reach'.

**Health inequalities**

Potential neutral impact selected.

**Explanation of your reasoning:**

The element of the project which is being proposed to Cabinet in 2024 is an 'LNRS Issues and Options' public consultation. The outcomes of this consultation will inform development of our future LNRS. The Issues and Options consultation will not result in outputs which produce a tangible change or direct or indirect effect on our residents, communities or businesses, including any group suffering from health inequalities. A stakeholder engagement plan is currently in preparation, and will comply with guidance recently produced by Government and DEFRA. The Issues and Options consultation will capture some stakeholder's personal information, including personal data such as age and location. Along

with the stakeholder engagement plan, this data will allow us to evaluate how well WCC is reaching groups defined by DEFRA as 'harder to reach'.

## **Social and economic**

Potential neutral impact selected.

### **Explanation of your reasoning:**

The element of the project which is being proposed to Cabinet in 2024 is an 'LNRS Issues and Options' public consultation. The outcomes of this consultation will inform development of our future LNRS. The Issues and Options consultation will not result in outputs which produce a tangible change or direct or indirect effect on our residents, communities or businesses, including any socially or economically disadvantaged group. A stakeholder engagement plan is currently in preparation, and will comply with guidance recently produced by Government and DEFRA. The Issues and Options consultation will capture some stakeholder's personal information, including personal data such as age and location. Along with the stakeholder engagement plan, this data will allow us to evaluate how well WCC is reaching groups defined by DEFRA as 'harder to reach'.

## **Physical health**

Potential neutral impact selected.

### **Explanation of your reasoning:**

The element of the project which is being proposed to Cabinet in 2024 is an 'LNRS Issues and Options' public consultation. The outcomes of this consultation will inform development of our future LNRS. The Issues and Options consultation will not result in outputs which produce a tangible change or direct or indirect effect on our residents, communities or businesses, including any group suffering from physical health complaints. A stakeholder engagement plan is currently in preparation, and will comply with guidance recently produced by Government and DEFRA. The Issues and Options consultation will capture some stakeholder's personal information, including personal data such as age and location. Along with the stakeholder engagement plan, this data will allow us to evaluate how well WCC is reaching groups defined by DEFRA as 'harder to reach'.

## **Mental health and wellbeing**

Potential neutral impact selected.

### **Explanation of your reasoning:**

The element of the project which is being proposed to Cabinet in 2024 is an 'LNRS Issues and Options' public consultation. The outcomes of this consultation will inform development of our future LNRS. The Issues and Options consultation will not result in outputs which produce a tangible change or direct or indirect effect on our residents, communities or businesses, including those suffering due to mental health or wellbeing matters. A stakeholder engagement plan is currently in preparation, and will comply with guidance recently produced by Government and DEFRA. The Issues and Options consultation will capture some stakeholder's personal information, including personal data such as age and location. Along with the stakeholder engagement plan, this data will allow us to evaluate how well WCC is reaching groups defined by DEFRA as 'harder to reach'.

## **Access to services**

Potential neutral impact selected.

**Explanation of your reasoning:**

The element of the project which is being proposed to Cabinet in 2024 is an 'LNRS Issues and Options' public consultation. The outcomes of this consultation will inform development of our future LNRS. The Issues and Options consultation will not result in outputs which produce a tangible change or direct or indirect effect on our residents, communities or businesses, including modifying access to public services. A stakeholder engagement plan is currently in preparation, and will comply with guidance recently produced by Government and DEFRA. The Issues and Options consultation will capture some stakeholder's personal information, including personal data such as age and location. Along with the stakeholder engagement plan, this data will allow us to evaluate how well WCC is reaching groups defined by DEFRA as 'harder to reach'.

## 6 **Actions to mitigate potential negative impacts**

**You have confirmed that there are no negative impacts for equality protected characteristics and public health characteristics.**

7

## **When will you review this equality and public health estimate(EPHIA)?s**

**A Equality assessment has been commissioned to support the LNRS Issues and Options Stage public consultation and will be reviewed as the strategy progresses towards development of a full and final iteration for adoption and submission to the Secretary of State.**

## 8 **Declaration**

The following statement has been read and agreed:

- **All public bodies have a statutory duty under the Equality Act 2010 to set out arrangements to assess and consult on how their policies and functions impact on the 9 protected characteristics: Age; Disability; Gender Reassignment; Marriage & Civil Partnership; Pregnancy & Maternity; Race; Religion & Belief; Sex; Sexual Orientation**
- **Our Organisation will challenge discrimination, promote equality, respect human rights, and aims to design and implement services, policies and measures that**



meet the diverse needs of our service, and population, ensuring that none are placed at a disadvantage over others

- All staff are expected to deliver and provide services and care in a manner which respects the individuality of service users, patients, carers etc, and as such treat them and members of the workforce respectfully, paying due regard to the 9 protected characteristics

I confirm to the best of my knowledge that the information I have provided is true, complete and accurate

I confirm that I will make sure that Equality and Public Health have been and continue to be considered throughout the project life cycle and that, if circumstances change in the project, a further Equality and Public Health Impact Assessment Screening will be carried out.

## 8 Application Details

### Last Updated Date Time

20/10/2023 16:23:47

### Screening Submitted Date Time

14/08/2023 14:44:00

### Last Reopened Date Time

19/10/2023 13:29:47

### Full Impact Submitted Date Time

20/10/2023 16:23:47

### Approved/Rejected Date Time

No Date Recorded

### Current User Dashboard Request Status

Submitted

## 9.0 People with access to the original screening

[Cody Levine \(CLevine@worcestershire.gov.uk\)](mailto:CLevine@worcestershire.gov.uk)

[Natasha Friend \(NFriend@worcestershire.gov.uk\)](mailto:NFriend@worcestershire.gov.uk)

## 9.1

### People with access to this equality and public health assessment

## 10 Direct Questions

### Question:

Hi Cody

Please could you provide more detail around how different characteristics benefit or dont benefit from this project ie:

Will it have an impact on vulnerable and disadvantaged people? If not state no, if you feel it has a positive impact then please describe ie does the project provide better access to services for people who are vulnerable and disadvantaged which may have a positive impacts on their health and wellbeing.

Will the project provide social and economic opportunities ie For example would it affect housing, transport, child development, education, good employment opportunities, green space or climate change? It may have a positive impact?

Physical health: Does the project provide opportunity for people to improve physical health and if so how?

Mental Health and wellbeing: Does the project provide opportunity for people to improve mental health and wellbeing and if if so how?

Asked by Victoria Moulston (VMoulston@worcestershire.gov.uk) at 18/08/2023 10:52:39  
Cody Levine (CLevine@worcestershire.gov.uk) has been asked this question.

### Response:

Hi Victoria

At this stage of the project we're developing an initial 'Issues and Options' public consultation to brief the public/residents/businesses/organisations on our development proposals for a future LNRS; we'll propose outline document contents including Worcestershire's biodiversity priorities and principles which will be underpinned by an evidence base which we'll also share.

In order to undertake a public consultation this coming winter we're preparing a paper for November's Cabinet and were rightly prompted to complete a JIA as part of that process. However, we don't envisage our Issues and Options consultation to selectively disadvantage any group with protected characteristics; It should provide an opportunity to give voice to everyone who wants to collaborate and contribute in the development of a 'full' LNRS next summer.

We recognise existing socio-economic inequalities in accessing natural green space, and aspire for the LNRS to provide opportunities for all (including groups with protected characteristics) to find more and better opportunities to access Worcestershire's natural environment, with subsequent health and metal wellbeing benefits. But this work will

begin it's development next year, and will be informed by our Issues and Options consultation responses.

I hope that helps but please do let me know if you need any further clarification or have any additional questions.

Many thanks

Cody

Cody Levine (CLevine@worcestershire.gov.uk) at 21/08/2023 12:06:23

### **Response:**

Hi Cody

I have reopened the assessment so you can update the PH aspect of the HIA . If you have any queries please don't hesitate to contact me

BW

Vicki

Victoria Moulston (VMoulston@worcestershire.gov.uk) at 29/08/2023 11:45:50

### **Response:**

Updated text under Public Health and Equalities sections as advised.

Thanks

Cody

Cody Levine (CLevine@worcestershire.gov.uk) at 25/10/2023 14:12:05

[Add Response](#)

## 11 Sign off

### **Public Health sign off**

This assessment was signed off at 27/10/2023 11:10:00 by Sarah Lawlor

### **Equality sign off**

This assessment was signed off at 25/10/2023 15:02:37 by Maddy Cameron

[Edit Assessment](#)

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## Data Protection Full Assessment Impact Assessment Id: #580

### 1.0 Screening Information

#### Project Name

Local Nature Recovery Strategy (LNRS)

#### Name of Project Sponsor

Emily Barker

#### Name of Project Manager

Cody Levine

#### Name of Project Lead

Cody Levine

#### Please give a brief description of the project

LNRS are a statutory requirement from the Environment Act requiring the Secretary of State to appoint Responsible Authorities (WCC in the case of Worcestershire) to collaborate with the public and Supporting Authorities in production of a spatial plan for nature's recovery, establishing local priorities and locations for conservation and enhancement action which will also help deliver wider environmental benefits.

#### Data Protection screening result

Will require a full impact assessment

#### Equality and Public Health screening result

Will require a full impact assessment

#### Environmental Sustainability screening result

Will require a full impact assessment

### 1.1 Background and Purpose

#### Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document.

LNRS are a statutory requirement from the Environment Act requiring the Secretary of State to appoint Responsible Authorities (WCC in the case of Worcestershire) to collaborate with the public and Supporting Authorities in production of a spatial plan for nature's recovery, establishing local priorities and locations for conservation and enhancement action which will also help deliver wider environmental benefits.

#### Upload Business Case or Support documents

No files uploaded

#### Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

Public consultation on a Statement of Biodiversity Priorities and Local Habitat Map setting out how and where Worcestershire will achieve nature's recovery

#### Project Outcomes

Briefly summarise what the project will achieve.

The LNRS, once adopted, will help influence land-use decision making, for example helping spatially focus Biodiversity Net Gain offsets and Environmental Stewardships.

#### Is the project a new function/service or does it relate to an existing Council function/service?

New

#### Was consultation carried out on this project?

No

## 1.2 Responsibility

### Directorate/Organisation

Economy & Infrastructure

### Service Area

Major Projects & Waste

## 1.4 Specifics

### Project Reference (if known)

LNRS

### Intended Project Close Date \*

March 2025

## 1.5 Project Part of a Strategic Programme

### Is this project part of a strategic programme?

No

## 2.0 Personal Data

### Who are you processing data about?

Customers, clients or service users

Suppliers

Complainants, enquirers or their representatives

Professional advisers and consultants

Recipients of Benefits

Representatives of other organisations

Other - landowners, their tenants and agents. parish, district and town councils and councilors.

### What personal data will be collected? \*

The second stage is to list all of the types of personal data that you believe the project/works/additional processing will utilise.

Please select yes for as many examples of types of data that are relevant and include any others in the free text at the bottom of the page.

### Basic Identifiers:

#### Name

Yes

#### Date of Birth

No

#### Age

No

#### Gender

No

#### Sex

No

### Contact Details:

**Address**

No

**Email Address**

Yes

**Home Phone Number**

Yes

**Mobile Phone Number**

Yes

**Postcode**

No

**ID Number:**

**National Insurance Number**

No

**Driving Licence/Number**

No

**NHS Number**

No

**Other General Identifier**

No

**Employment:**

**Work Related Training/Awards**

No

**Financial:**

**Income/Financial/Tax Situation**

No

**Appearance:**

**Photograph**

No

**Physical Description**

No

**Lifestyle:**

**Living Habits**

No

**Marital Status**

No

**Technology:**

**Login/Username**

No

**Device MAC Address (Wireless Network Interface)**

No

**Device Mobile Phone/Device IMEI No**

No

**Location Data (Travel/GDPS/GSM Data)**

No

**Online Identifier e.g. IP Address**

No

**Website Cookies**

No

**Other Data Types Collected**

consultees may elect to share data about land, landholdings or other observations

**2.1 Legal basis for Personal Data**

**What is your lawful basis for processing the personal data? \***

Please choose one of the following

Data Subject's consent for the purpose

Yes

Necessary for a contract with the Data Subject

No

Necessary to comply with a legal obligation

No

Necessary to protect the vital interests of an individual(s)

No

Necessary for a task in the public interest or exercise of official authority of Controller

Yes

Necessary for legitimate interests of Controller unless interests are overridden by the interests or rights of the individual (only available in limited circumstances to public bodies)

Yes



## 2.2 Special Data

### What special category personal data (if any) will be collected? \*

This section will not apply to all projects and should only be completed if it applies to you.

It is important that you read this section carefully, as these data types require additional care and protection.

If you do pick anything from this list, you will be required to give more details in Section 4 of this form.

You can read more about Special Category Data through this link;

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

#### Race

No

#### Ethnic origin

No

#### Political opinions

No

#### Religion

No

#### Philosophical beliefs

No

#### Trade union membership

No

#### Genetic Data

No

#### Biometric Data

No

#### Sex life

No

#### Health or social care

No

## 2.3 Legal basis for Special Data

### What is the relevant condition for processing the special category personal data? \*

You must qualify under one of the below exemptions as well as having a legal basis from the previous question.

#### Explicit Consent

The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

Not Recorded

#### Employment and Social Security

Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

Not Recorded

#### Vital Interests

Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

Not Recorded

#### Legitimate Interests of:

**"a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim".**

Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;

**Note – this is not often applicable to local authorities.**

Not Recorded

**Publicly Available Data**

Processing relates to personal data which are manifestly made public by the data subject;

Not Recorded

**Legal or Court Proceedings**

Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

Not Recorded

**Public Interest - Statutory Necessity**

Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

Not Recorded

**Medical, Health and Social Care Provision**

Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

Not Recorded

**Public Health**

Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;

Not Recorded

**Archiving or Scientific, Historical or Statistical Research Purposes**

Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Not Recorded

**2.4**

**Information Involved**

Understanding the information flows involved in a project is essential to a proper assessment of privacy risks.

**How will the data be collected? \***

This section should be filled in for every project, not just those collecting Special Category data.  
online survey form, geospatial data

**What will the data be used for? \***

This section should be filled in for every project, not just those collecting Special Category data.  
proposals for nature's recovery will be captured, held and assessed based on deliverability, suitability and opportunities to secure wider environmental benefits

**Has data already been collected?**

No

**Are the purposes for which you are collecting the data different? \***

If the data you are hoping to use was not collected specifically for this project, please explain in the box below why it was collected. This will

include data that you have collected from other teams within WCC.

Not Recorded

**Explain why existing and/or less intrusive processes or measures would be inadequate \***

In this section, you should explain why your new method/project is absolutely necessary and show that you have thought about all other options.

no existing processes or measures currently exist

**3.0**

**Other organisations**

**Are other organisations involved in processing the data?**

Yes

Please provide details of each organisation that is involved in the processing of Data. Do this by adding to the below list. \*

<b>Organisation Name</b>	Worcestershire Wildlife Trust
Data Controller or Data Processor	Data Processor
Organisation's Role	Assessing and scoring site proposals for delivering nature recovery initiatives, depending on landowner permission, contacting consultees to provide further requested information and advice
Data Sharing Agreement or Contract	No
Contract Reference Number/DSA Name	n/a
Organisation involved reason	WWT, as a member of the Worcestershire Local Sites Partnership are supporting LNRS functions by issuing site management information to benefit nature with site owners where this is requested by the consultee
Disclosure and Security	the data owner will only disclose contact names, emails or telephone numbers with the data processor where permission has been granted by land owner. Data will be issued by password locked word document and deleted on completion of LNRS preparation unless otherwise agreed with landowner.

1 record

**3.1**

**Storage detail**

**How will the information be stored? \***

Please include details of whether data will be stored outside of the European Economic Area (EEA).

Please remember that cloud storage and back up servers maybe outside the EEA.

Geospatial data will be stored in ArcGIS Pro and downloaded to secured Sharepoint site on completion of public consultation. ArcGIS Pro is a password secured service linked to desktop pro licensed users. Webforms associated with the LNRS consultation will also be saved in a sharepoint folder accessible only to WCC staff granted access permissions through the appropriate MS Teams channel.

**For how long will the data be retained? \***

For period of LNRS preparation: no less than 2 years and no more than 3years.

**What is the deletion process? \***

data owner will delete sharepoint files on completion of LNRS preparation (adoption by Secretary of State)

## 4 Consultation details

Consultation can be used at any stage of the DPIA process and is important to allow people to highlight privacy risks and solutions based on their own area of interest or expertise.

For further assistance and information please visit the [consultation toolkit section on Ourspace](#).

### Explain what practical steps you are going to take to ensure that you identify and address privacy risks \*

greatest risk is transmission of private data returned during the public consultation period which will be fully addressed by ensuring this dataflow is saved securely with limited access permissions to project staff and data processors only, and that selected data slices which do not include data containing private attributes are subsequently shared in our consultation responses. i.e. geospatial data is shared, names of respondents are not.

### Who should be consulted, internally and externally? Do you need to seek the views of members of the public? \*

We will need to seek views of the general public, residents, communities, businesses and other organisations such as town and parish councils and project partners.

### How will you carry out the consultation? \*

(You should link this to the relevant stages of your project management process)

We will undertake an initial Issues and Options consultation which will make use of the existing Planning Consultation Database, public press and local authority newsletters. We will publish a webmap which will contain webforms and open a consultation inbox with access limited to WCC project officers to collate, download and save responses to sharepoint.

## 5 Risk register

At this stage you should identify the possible privacy risks together with their likelihood, severity and overall level, and for high risks the measures taken to reduce the risk.

Add any risk to the relevant sections below.

### Fair and Lawful Processing

Data must be processed lawfully, fairly and in a transparent manner.

Please also consider

- Have you identified at least one lawful basis for the personal data processed as part of the project?
- Does at least one Controller involved have a lawful power to act?
- Do you need to create or amend a privacy notice?
- How is your processing going to be transparent?

#### Risk that processing is not transparent, and individuals are unaware that data is being collected or why it is processed

No Risk

#### Risk that information is being processed unlawfully

No Risk

### Specific, explicit and legitimate purposes

The purpose for which you process personal data must be specified, explicit and legitimate. Personal data collected must not be processed in a manner that is incompatible with the purpose for which it was originally collected.

Please also consider

- Does your project plan cover all of the purposes for processing personal data? If not your plan needs amending accordingly.
- Are all elements of the processing compatible with the original reason and justification for the processing?
- What are these specific, explicit and legitimate purposes?

#### Risk of 'mission creep' and information is used for different, or incompatible purposes to that identified when originally collected

**Unmitigated Risk**  
Likelihood - Unlikely

Severity - Some Impact

Score - Low

**Mitigation/Solution**

consultees will be informed at outset of the nature of data being collected, how it will be stored and used and for how long it will be kept - expectation management will ensure 'mission creep' risk is minimised.

**Mitigated Risk**

No Risk

**Result**

Eliminated

## Adequate, relevant and not excessive

Personal data processed must be adequate, relevant and not excessive in relation to the purpose for which it is processed.

Please also consider

- Is the quality of the information adequate for the purposes it is used?
- If not, how is this to be addressed?
- Are measures in place to ensure that data is limited to that which is needed to fulfill the aim of the processing?
- Which personal data elements do not need to be included without compromising the needs of the project?

### Risk of loss of control over the use of personal data

**Unmitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Mitigation/Solution**

data processors kept to absolute minimum and only data with user permissions granted will be shared

**Mitigated Risk**

No Risk

**Result**

Eliminated

### Risk that inadequate data quality means the information is not fit for the identified purpose(s) potentially leading to inaccurate decision making

**Unmitigated Risk**

Likelihood - Reasonably Unlikely

Severity - Minimal Impact

Score - Low

**Mitigation/Solution**

webforms will be designed to ensure tailored and specific questions ensure detail of information collected is fit for purpose

**Mitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Result**

Accepted

### Risk that any new surveillance methods may be an unjustified intrusion on individuals' privacy

No Risk

## Accurate and timely

Personal data processed must be accurate and, where necessary, kept up to date, and every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay.

Please also consider

- If you are procuring new software does it allow you to amend data when necessary?
- How are you ensuring that personal data obtained from individuals or other organisations is accurate?
- Do you have processes in place to keep data up to date?
- If any data sets are to be merged, what checks are carried out to ensure that the right data records are matched/merged together?

### Any data matching or linking, including whole data sets may link wrong records together

**Unmitigated Risk**

Likelihood - Unlikely  
 Severity - Minimal Impact  
 Score - Low

**Mitigation/Solution**

data owners and processors will be informed of risk of data transmission and modification errors. outputs will be peer reviewed within the organisation and datasets deleted on project completion

**Mitigated Risk**

No Risk

**Result**

Eliminated

**Storage limitation**

Personal data must be kept for no longer than is necessary for the purpose for which it is processed. Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data.

Please also consider

- What are the risks associated with how long data is retained and how they might be mitigated?
- Has a review, retention and disposal (RRD) policy been established?
- How does the software enable you to easily act on retention criteria – does it enable bulk review/destruction; set review periods; extract for long-term preservation/retention of the corporate memory?

**Risk information is retained for the wrong length of time (both too long and too short)****Unmitigated Risk**

Likelihood - Reasonably Unlikely  
 Severity - Minimal Impact  
 Score - Low

**Mitigation/Solution**

Sharepoint files have a retention policy setting and will be deleted on completion of the LNRS project

**Mitigated Risk**

No Risk

**Result**

Eliminated

**Risk information is not securely destroyed when its retention period has been reached**

No Risk

**Security**

Personal data must be processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, “appropriate security” includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage).

Please also consider

- What technical and organisational measures are in place to ensure that the data is protected to an adequate level?
- What training on data protection and/or information sharing has been undertaken by relevant staff?
- What access controls are in place to enforce the ‘need to know’ principle?
- What assurance frameworks are utilised to assess adequacy of security measures in place e.g. NHS DSPT; Cyber Essentials Plus; PSN Certification?

**Risk of loss of confidentiality****Unmitigated Risk**

Likelihood - Unlikely  
 Severity - Minimal Impact  
 Score - Low

**Mitigation/Solution**

appropriate security processes are inbuilt in sharepoint and geospatial data storage platforms. all WCC project staff will have completed GDPR elearning training

**Mitigated Risk**

No Risk

**Result**

Eliminated

**Risk of inadequate security controls in place to protect and secure personal data, including inappropriate access****Unmitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Mitigation/Solution**

data storage and processing controls applied - personal data collected is minimized to only that essential for project scope. only staff with set access permissions will be able to access and manipulate personal data in the sharepoint site. only data which respondents have given permission to share will be shared with data processors.

**Mitigated Risk**

No Risk

**Result**

Eliminated

**Risk that workers processing the data are not aware of their data responsibilities****Unmitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Mitigation/Solution**

all WCC staff involved will have undertaken GDPR elearning

**Mitigated Risk**

No Risk

**Result**

Eliminated

**Risk that information is distributed using inappropriate methods****Unmitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Mitigation/Solution**

data storage and processing will only be possible using project software or locked documents preventing unauthorized or unintended distribution

**Mitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Result**

Accepted

**Risk of re-identification of pseudonymized or anonymised data (e.g. collecting matching and linking identifiers and information may result in information that is no longer safely anonymised)**

No Risk

**Risk that information is transferred to a 'third country' without adequate safeguards**

No Risk

**Financial and reputational****Risk of identity theft or fraud**

No Risk

**Risk of financial loss for individuals or other third parties**

No Risk

**Risk of financial loss for the Council (including ICO fines)**

No Risk

#### Risk of reputational damage to the Council, partners, and processors

##### Unmitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

##### Mitigation/Solution

no personal data is required to be articulated either in the consultation or consultation response documents and therefore the key reputational damage risk relates to unintended or accidental document or data distribution, for which mitigation has previously been detailed.

##### Mitigated Risk

No Risk

##### Result

Eliminated

### Health, safety and wellbeing

#### Risk of physical harm to individuals

No Risk

#### Risk of physical harm to staff and workers

No Risk

#### Risk of discrimination

No Risk

#### Risk of other significant economic or social disadvantage

No Risk

### Individuals Rights

Data protection legislation gives data subjects' various rights (listed below). Limiting or restricting any of these rights is likely to be a significant impact so the justification for any restriction, as well as mitigations, must be fully outlined.

#### Inability to meet individuals' right to be informed

No Risk

#### Inability to meet individuals' right of access

No Risk

#### Inability to meet individuals' right to rectify inaccurate data

No Risk

#### Inability to meet individuals' right to erase data

##### Unmitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

##### Mitigation/Solution

the consultation will include specific text confirming that respondents may contact the dataowner (WCC) to modify or delete their submissions at any point in time during LNRS preparation

##### Mitigated Risk

No Risk

##### Result

Eliminated

#### Inability to meet individuals' right to restrict processing

No Risk



**Inability to meet individuals' right to data portability**

No Risk

**Inability to meet individuals' right to object**

No Risk

**Inability to meet individuals' rights relating to automated decision making and profiling****Unmitigated Risk**

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

**Mitigation/Solution**

land-use decision making is a principle component of LNRS preparation and individuals will be consulted on the criteria used to core land-use proposals.

**Mitigated Risk**

No Risk

**Result**

Eliminated

**Additional project specific risks**

No additional risks recorded

**6****Declaration**

I confirm to the best of my knowledge that the information I have provided is true, complete and accurate \*

Selected

I confirm that I will make sure that data protection has been and continues to be considered throughout the project life cycle and should circumstances change in the project to include any processing of personal data a further Data Protection Impact Assessment Screening will be carried out \*

Selected

**7****Application Details****Last Updated Date Time**

15/08/2023 16:44:11

**Screening Submitted Date Time**

14/08/2023 14:44:00

**Last Reopened Date Time**

No Date Recorded

**Full Impact Submitted Date Time**

15/08/2023 15:44:11

**Approved/Rejected Date Time**

18/08/2023 15:24:17

**Current User Dashboard Request Status**

Complete

## **8.0** People with access to the original screening

[Cody Levine \(CLevine@worcestershire.gov.uk\)](mailto:CLevine@worcestershire.gov.uk)

## **8.1** People with access to this data protection assessment

[Cody Levine \(CLevine@worcestershire.gov.uk\)](mailto:CLevine@worcestershire.gov.uk)

## **9** Direct Questions

No Questions Asked

## Environmental Sustainability Full Impact Assessment

### Impact Assessment Id: #580

#### 1.0 Screening Information

**Project Name**

Local Nature Recovery Strategy (LNRS)

**Name of Project Sponsor**

Emily Barker

**Name of Project Manager**

Cody Levine

**Name of Project Lead**

Cody Levine

**Please give a brief description of the project**

LNRS are a statutory requirement from the Environment Act requiring the Secretary of State to appoint Responsible Authorities (WCC in the case of Worcestershire) to collaborate with the public and Supporting Authorities in production of a spatial plan for nature's recovery, establishing local priorities and locations for conservation and enhancement action which will also help deliver wider environmental benefits.

**Data Protection screening result**

Will require a full impact assessment

**Equality and Public Health screening result**

Will require a full impact assessment

**Environmental Sustainability screening result**

Will require a full impact assessment

#### 1.1 Background and Purpose

**Background and Purpose of Project?**

To support your answer to this question, you can upload a copy of the project's Business Case or similar document.

LNRS are a statutory requirement from the Environment Act requiring the Secretary of State to appoint Responsible Authorities (WCC in the case of Worcestershire) to collaborate with the public and Supporting Authorities in production of a spatial plan for nature's recovery, establishing local priorities and locations for conservation and enhancement action which will also help deliver wider environmental benefits.

**Upload Business Case or Support documents**

No files uploaded

**Project Outputs**

Briefly summarise the activities needed to achieve the project outcomes.

Public consultation on a Statement of Biodiversity Priorities and Local Habitat Map setting out how and where Worcestershire will achieve nature's recovery

**Project Outcomes**

Briefly summarise what the project will achieve.

The LNRS, once adopted, will help influence land-use decision making, for example helping spatially focus Biodiversity Net Gain offsets and Environmental Stewardships.

**Is the project a new function/service or does it relate to an existing Council function/service?**

New

**Was consultation carried out on this project?**

No

## 1.2 Responsibility

### Directorate/Organisation

Economy & Infrastructure

### Service Area

Major Projects & Waste

## 1.3 Specifics

### Project Reference (if known)

LNRS

### Intended Project Close Date \*

March 2025

## 1.4 Project Part of a Strategic Programme

### Is this project part of a strategic programme?

No

## 2 Greenhouse Gas Emissions

### Could the project result in an increase in GHG emissions (including CO2)? No

Please be mindful that the Council has committed to reduce its GHG emissions to zero by 2050 and most projects are likely to have an impact on this target. This should be a key consideration in your project delivery and should be reviewed when completing the assessment.

### Have you undertaken an assessment of the project to know if there will likely be an increase in GHG emissions? No

## 3 Resources

### Will the project result in increased consumption of electricity, gas or other heating fuels? No

e.g. project may require use of additional buildings, lighting and heating in buildings, additional ICT equipment, etc.

### Will the project reduce energy needs and result in reduced consumption? No

e.g. disposal of WCC property assets

### Will the project require additional water resources leading to an increase in water consumption? No

e.g. increased use of water through construction processes

### Might there be a decrease in water consumption? Yes

e.g. will the project involve water saving measures or initiatives

### Please explain your answer below:

An output will be Local Habitat Map opportunity mapping illustrating appropriate locations for creation/restoration of wetland habitats suitable for surface water attenuation and flood alleviation

### Will the project result in the use of other resources, materials or minerals? No

e.g. use of natural resources such as wood; or use of aggregate minerals?

## 4 Transport

**Will the project result in more people needing to travel? No**

e.g. will there be additional cars on the road

**Have alternative transport modes been considered? No**

e.g. could use be made of public transport/walking/cycling etc.

## 5 Waste

**Is there likely to be an increase in waste as a result of the project? No**

e.g. construction waste, packaging waste etc.

**Have opportunities to prevent, minimise, reuse or recycle waste been identified and considered? No**

e.g. will recycling facilities be available as part of the project

## 6 Wildlife and Biodiversity

**Will there be any negative impacts on the natural environment? Yes**

e.g. will the project involve removal of green space/trees; have wildlife surveys been considered; result in enhancements to green infrastructure; increased biodiversity opportunities etc.?

**Please explain your answer below:**

in order to create and restore habitats land-use change may be required, LNRS will be subject to a Habitats Regulation Assessment and will also recommend that projects and site-level activities are supported by ecological assessments to be commissioned by project and site owners for legislative compliance

**Has a preliminary ecological appraisal been undertaken? No**

**Please explain your answer below:**

Not recorded

**Has there been consideration of statutory assessments? Yes**

e.g. Sustainability Appraisals, Strategic Environmental Assessments and Habitat Regulations Assessment Screening?

N.B. This is a matter of legal compliance - All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. This consideration – typically referred to as the 'Habitats Regulations Assessment screening' – should take into account the potential effects both of the plan/project itself and in combination with other plans or projects.

**Please explain your answer below:**

SEA has been commissioned and is currently undergoing consultation with statutory bodies. HRA will be commissioned as the LNRS moves from Issues and Options towards detailed reporting stage.

## 7 Pollution to land/air/water

**Is there a risk of pollution to the local environment? No**

e.g.

- will there be surface water run-off or discharge into local water source?
- will there be any impact on local water quality?
- will any waste water require treatment?
- is there the potential for spillage of chemicals?
- is there the potential for emissions to air from combustion processes resulting in poor air quality?

## 8 Resilience to climate risks

**Could climate risks affect your project? Yes**

N.B. some projects may be more sensitive to future changes in the climate e.g. hotter and drier summers; milder and wetter winters; increased likelihood of extreme weather events. These climate risks may affect project delivery and should be considered at the early stages of project development.

**Please explain your answer below:**

the success or failure in creation and restoration of habitats could be influenced by climatic change and detailed LNRS development will need to be informed by climate change vulnerability datasets

**Has the impact of extreme weather events on the project been considered? No**

e.g. heat waves and flooding.

**Is there a business/project continuity plan in place to ensure climate risks are minimised? No**

e.g. can you ensure that the project is resilient to climate risks and can continue to deliver on outcomes.

**Could the project exacerbate climate risks? No**

e.g. increase flood risk or worsen temperature extremes in the locality.

**Will the project result in the use of other resources, materials or minerals? No**

e.g. use of natural resources such as wood; or use of aggregate minerals?

## 9 Historic Environment

**Have you checked with the WCC Historic Environment team as to whether there are any impacts on the Historic Environment (negative or positive)?**

**No**

Check every development with the Historic Environment Team at the planning stage of each project. Further assessment may be required depending on the nature and scale of development. There may also be design options that would negate any need for further assessment (and lessen costs), or even opportunities to enhance heritage assets or their setting through the development.

**Does the development have the potential to result in any impacts to the historic environment or opportunities for enhancement?**

**Yes**

If yes, then further assessment will be required. This could take the form of a watching brief during groundworks if the potential is clearly understood and relatively low, or a more comprehensive desk-based and/or field investigation prior to development.

**Please explain your answer below:**

the strategy sets a land-use framework for the county (but does not compel land owners to undertake any specific activities) and therefore it is incumbent on individual land owners and project managers to commission site-levels surveys to ensure they remain legislatively and policy compliant

## 10 Procurement

**Could any procurement associated with the project have a detrimental environmental impact? No**

e.g. procurement of goods from overseas that have to be shipped; use of unsustainable materials or materials that cannot be recycled at the end of their use?

**Is there likely to be increased Greenhouse Gas emissions from products purchased for the project? No**

e.g. carbon emissions from transport and manufacturing

**Will you be able to make use of sustainable products? No**

e.g. recycled, local, ethical etc.

**Have you considered the Public Services (Social Value) Act 2012? No**

All major contracts let by the Council (those of more than £100,000 in total value) will be expected to deliver a meaningful contribution to our vision of Social Value in the county. The Act requires us to consider how the services we commission and procure might improve the economic, social and environmental well-being of the local area.

– please see: [Social Value](#)

## 11 Declaration

I have confirmed that to the best of my knowledge that the information I have provided is true, complete and accurate

I have confirmed that I will make sure that Environmental Sustainability has been and continues to be considered throughout the project life cycle and should circumstances change in the project a further Environmental Sustainability Assessment Screening will be carried out.

## 12 Application Details

### Last Updated Date Time

14/08/2023 14:54:49

### Screening Submitted Date Time

14/08/2023 14:44:00

### Last Reopened Date Time

No Date Recorded

### Full Impact Submitted Date Time

14/08/2023 14:54:49

### Approved/Rejected Date Time

No Date Recorded

### Current User Dashboard Request Status

Submitted

## 13.0 People with access to the original screening

[Cody Levine \(CLevine@worcestershire.gov.uk\)](mailto:CLevine@worcestershire.gov.uk)

## 13.1 People with access to this environmental sustainability assessment

[Cody Levine \(CLevine@worcestershire.gov.uk\)](mailto:CLevine@worcestershire.gov.uk)

## 14 Direct Questions

No Questions Asked

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## **Statement of Reasons:**

# **Determination that the Worcestershire Local Nature Recovery Strategy does not require an environmental assessment under the Environmental Assessment of Plans and Programmes Regulations 2004**

This statement has been prepared under regulation 9(3) of the Environmental Assessment of Plans and Programmes Regulations 2004 (“the regulations”).

Worcestershire County Council (WCC) is the responsible authority preparing a new Local Nature Recovery Strategy (LNRS) for the county.

Under regulation 9(1) of the regulations, WCC must determine whether the LNRS is likely to have significant environmental effects.

Before making this determination, Regulation 9(2) of the above regulations requires WCC to take into account the criteria in Schedule 1 to the regulations to consult the consultation bodies. For the purpose of the regulations, the consultation bodies are Natural England, Historic England and the Environment Agency.

WCC prepared a ‘Draft Screening statement on the requirement for Strategic Environmental Assessment of the Worcestershire Local Nature Recovery Strategy’ (included at Annex 1 to this document). The draft screening statement considered the Schedule 1 criteria and concluded that the LNRS will not have significant environmental effects and that Strategic Environmental Assessment is not required.

The consultation bodies were consulted on this draft between 2<sup>nd</sup> August 2023 until 8<sup>th</sup> September 2023 and were invited to confirm whether or not they agreed with the provisional conclusion in the draft screening statement. All three consultation bodies responded to the consultation and all three agreed that the LNRS does not require Strategic Environmental Assessment. These responses are included as Annex 2 to this document.

Based on the above process, WCC has determined that the LNRS does not require an environmental assessment under the regulations.

25<sup>th</sup> October 2023

**Annex 1: Draft Screening statement on the  
requirement for Strategic Environmental Assessment  
of the Worcestershire Local Nature Recovery Strategy**



**Draft Screening statement on the requirement for  
Strategic Environmental Assessment of the  
Worcestershire Local Nature Recovery Strategy**

**July 2023**

## 1. Introduction

1.1 Strategic Environmental Assessment or 'SEA' is a statutory requirement for certain plans and programmes under the Environmental Assessment of Plans and Programmes Regulations 2004 ('the Regulations')<sup>1</sup>.

1.2 This draft screening statement considers whether the Worcestershire Local Nature Recovery Strategy (LNRS) falls within the scope of the Regulations and, if it does, whether it is likely to have significant environmental effects. If the LNRS satisfies both tests, it will require SEA.

1.3 The Environment Agency, Natural England, and Historic England will be consulted on this draft statement. Their responses will inform the final determination under Regulation 9(1).

## 2. The Worcestershire Local Nature Recovery Strategy

2.1 Statutory guidance<sup>2</sup> states that *“Local nature recovery strategies are a system of spatial strategies for nature and environmental improvement required by law under the [Environment] Act”*. The guidance states that each strategy must: agree priorities for nature’s recovery; map the most valuable existing areas for nature; and map specific proposals for creating or improving habitat for nature and wider environmental goals.

2.2 The guidance also confirms that *“The main purpose of the strategies is to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment.”*

2.3 The overarching principles for the LNRS are that it will:

- achieve bigger, better, more joined-up habitats for nature
- ensure people have better and more meaningful access to nature
- make a significant contribution to meeting the climate change challenge
- allow strategic targeting of land management actions and funding mechanisms
- support stakeholders to engage and make a positive contribution

Details of how each of these principles will be delivered will be set out in the LNRS Issues & Options document.

## 3. Legislative requirements

3.1 The legislative provisions for the SEA Screening process are set out in the above Regulations, which transpose the relevant European Directive<sup>3</sup> into English law. Regulation 9(1) requires

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<sup>1</sup> The Environmental Assessment of Plans and Programmes Regulations 2004, available at <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>.

<sup>2</sup> Department for Environment, Food & Rural Affairs (March 2023) 'Local nature recovery strategy statutory guidance: What a local nature recovery strategy should contain'.

<sup>3</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042>.

that "the responsible authority<sup>4</sup> shall determine whether or not a plan, programme or modification ... is likely to have significant environmental effects". As such, this screening statement needs to consider whether the LNRS is a "plan, programme or modification" under the Regulations. If it is not, SEA is not required and the screening assessment need go no further. If it is, the screening statement must consider whether the LNRS "is likely to have significant environmental effects", taking into account the criteria in Schedule 1 to the Regulations, and following consultation with Natural England, the Environment Agency, and Historic England. If the LNRS is a "plan programme, or modification" and is determined to be "likely to have significant environmental effects", a full SEA will be required.

#### 4. Applying an SEA checklist to the LNRS

4.1 National guidance on SEA<sup>5</sup> was published in 2005 and remains extant. The guidance includes a checklist to help to identify whether or not SEA is required. It considers the legislative requirements step-by-step. The relevant aspects of the checklist, and the LNRS's likely relevance to each of them, are set out below. All references to "PP" relate to plans and programmes (in this case, the LNRS).

#### 4.2 Checklist criterion 1: Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))

Yes. Section 105(1) of the Environment Act 2021 requires the LNRS to be prepared and published by the responsible authority. On 30<sup>th</sup> June 2023 the Secretary of State for Environment, Food and Rural Affairs confirmed that Worcestershire County Council is the responsible authority for the administrative area of Worcestershire.

#### 4.3 Checklist criterion 2: Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

Yes. The requirement for Local Nature Recovery Strategies (LNRS) to be produced for areas in England is found in sections 104-105 of the Environment Act 2021 ("the act"). Detail on the required content of LNRSs, information they should contain, and interpretation of the act's provisions relating to LNRS is contained in sections 106-108 of the act. Section 105(1) of the act states that "A local nature recovery strategy for an area ("the strategy area") is to be prepared and published by the responsible authority."

#### 4.4 Checklist criterion 3: Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))

No. The LNRS is being prepared to "provide the greatest benefit for nature and the wider environment"<sup>6</sup>, and has the potential to affect all of the sectors listed above to some extent,

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<sup>4</sup> Defined as "the authority by which or on whose behalf [the LNRS] is prepared". In this case, the responsible authority is Worcestershire County Council.

<sup>5</sup> A Practical Guide to the Strategic Environmental Assessment Directive (September 2005), published by the former Office of the Deputy Prime Minister, available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf).

<sup>6</sup> Department for Environment, Food & Rural Affairs (March 2023) 'Local nature recovery strategy statutory guidance: What a local nature recovery strategy should contain', paragraph 4, available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1146160/Local\\_nature\\_recovery\\_strategy\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1146160/Local_nature_recovery_strategy_statutory_guidance.pdf).

with agriculture, forestry, water management and town and county planning or land use being particularly relevant. However, on balance it is concluded that the LNRS does not “set a framework for future development consent” of EIA projects; while the LNRS can help to guide priorities and resources, it does not set policy that will determine development consent. The statutory guidance states that *“The strategies do not force the owners and managers of the land identified to make any changes. Instead, the government is encouraging action through, for example, opportunities for funding and investment.”*<sup>7</sup>

It is important to recognise that there is no definitive list of which plans and programmes “set a framework” for future development consent. Annex II of the Directive presents criteria for determining the likely significance of effects. When referring to the characteristics of plans and programmes, the criteria include *“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”*.

European Commission Guidance<sup>8</sup> considers this issue in more detail. The guidance does not explicitly address the *“location, nature, size and operating conditions”* individually, but notes at paragraph 3.26 that *“Land use plans generally contain criteria determining what kind of development can take place in particular areas and are a typical example of plans which set the framework for future development consent.”* The guidance goes on to state that *“Whether particular criteria or conditions set the framework in individual cases will be a matter of fact and degree in each case.”*

The LNRS will not be part of the statutory development plan, but will have a relationship to land-use plans through forming part of their evidence base. Defra Guidance on LNRS preparation<sup>9</sup> states that *“The government intends for local nature recovery strategies to inform the local planning process. Local planning authorities must have regard to them in complying with the strengthened biodiversity duty. The government will provide separate guidance to explain what this means in practice.”*

In considering the “allocating resources” aspect, paragraph 3.25 of the guidance notes that *“It would be necessary for the resource allocation to condition in a specific, identifiable way how consent was to be granted (e.g. by setting out a future course of action (as above) or by limiting the types of solution which might be available).”* While the LNRS will help to guide resources, it is considered that it does not *condition* how consent will be granted or limited, and therefore fails to meet the threshold illustrated here. Similarly, paragraph 3.28 of the guidance states that *“The phrase could also include sectoral plans and programmes which in broad terms identify the location of subsequent development within that sector. It would be necessary in each case to consider the extent to which future decisions on projects were conditioned by the plan or programme.”*

#### **4.5 Checklist criterion 4: Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))**

No. Article 6(3) of the Habitats Directive refers to plans *“likely to have a significant effect”* on an SAC - without specifying whether such an effect would be positive or negative. While a literal interpretation may conclude that the LNRS *would* have a significant effect, a purposive interpretation is considered more appropriate. This is because *“the main purpose*

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<sup>7</sup> Department for Environment, Food & Rural Affairs (March 2023) ‘Local nature recovery strategy statutory guidance: What a local nature recovery strategy should contain’, paragraph 4.

<sup>8</sup> Guidance on the implementation of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, available at <https://circabc.europa.eu/ui/group/3b48eff1-b955-423f-9086-0d85ad1c5879/library/7527027a-126a-49e2-92ef-3aac8159fbf6/details?download=true>.

<sup>9</sup> Department for Environment, Food & Rural Affairs (March 2023) ‘Local nature recovery strategy statutory guidance: What a local nature recovery strategy should contain’, paragraph 8.

of the strategies is to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment.”<sup>10</sup> As such, the LNRS is intended to have a beneficial effect on sites, whereas Article 6(2) refers to “the deterioration of natural habitats and the habitats of species as well as disturbance of the species for which the areas have been designated, in so far as such disturbance could be significant in relation to the objectives of this Directive” (emphasis added). This screening statement considers it reasonable to conclude that plans such as the LNRS, designed to *improve* natural habitats, do not require assessment under the Directive.

**4.6 Checklist criterion 5: Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)**

No. The LNRS does not “determine” the use of any land. The statutory LNRS guidance states that “*The strategies do not force the owners and managers of the land identified to make any changes. Instead, the government is encouraging action through, for example, opportunities for funding and investment.*”<sup>11</sup>

**4.7 Checklist criterion 6: Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)**

No. The reasoning for this decision is set out under point (3) above.

**4.8 Checklist criterion 7: Is the PP’s sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)**

No. The LNRS does not satisfy any of these criteria.

**4.9 Checklist criterion 8: Is it likely to have a significant effect on the environment? (Art. 3.5)<sup>12</sup>**

No. Schedule 1 to the SEA Regulations sets out criteria to consider when determining whether or not a plan or programme could have significant effects on the environment. The following headings are taken from Schedule 1, and provide a structured format to evaluate this criterion:

**Criterion 1(a):**                    **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**

LNRS:                                This issue is addressed under items (3) and (6) above, which conclude that the LNRS does not meet the threshold for “setting a framework”.

**Criterion 1 (b):**                    **The degree to which the plan or programme influences other plans and programmes including those in a hierarchy**

LNRS:                                While “*the status of LNRSs in the planning system is yet to be clarified*”<sup>13</sup>, it is clear that the LNRS will aim to positively guide

<sup>10</sup> Department for Environment, Food & Rural Affairs (March 2023) ‘Local nature recovery strategy statutory guidance: What a local nature recovery strategy should contain’, paragraph 4.

<sup>11</sup> Department for Environment, Food & Rural Affairs (March 2023) ‘Local nature recovery strategy statutory guidance: What a local nature recovery strategy should contain’, paragraph 4.

<sup>12</sup> The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case-by-case basis and/or by specifying types of plan or programme.

<sup>13</sup> Planning Advisory Service: Nature Recovery Frequently Asked Questions, available at <https://www.local.gov.uk/pas/topics/environment/nature-recovery-local-authorities/nature-recovery-faqs>.

the development and application of other plans and strategies, including planning policy documents within Worcestershire. Section 102(5) of the Environment Act 2021 requires the Secretary of State to issue guidance to local planning authorities as to how they must have regard to LNRS<sup>14</sup>. In considering “*What weight will LNRSs have in planning decision making? What status will they have?*”, the Planning Advisory Service states that “*This is an unknown at present. Further guidance on the links between the current planning system and the future planning system post-LURB will be provided by DLUHC/DEFRA.*”

<b>Criterion 1 (c):</b>	<b>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development</b>
LNRS:	The LNRS will be directly concerned with environmental considerations. As such, this criterion is of direct relevance.
<b>Criterion 1 (d):</b>	<b>Environmental problems relevant to the plan or programme</b>
LNRS:	The LNRS is a strategy for nature’s recovery. This means there is explicit recognition of the need to restore habitats and species. There is a need to reverse the “environmental problems” of decline, meaning that this criterion is of direct relevance.
<b>Criterion 1 (e):</b>	<b>The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection)</b>
LNRS:	Although it may not focus specifically on those species/habitats protected under the Habitats and Birds Directives - and on land or watercourses that are functionally linked to European-designated sites - the LNRS is strongly likely to contribute indirectly to their conservation. The LNRS may also be relevant, albeit to a lesser degree, to the implementation of other Community legislation, including the Water Framework Directive.
<b>Criterion 2 (a):</b>	<b>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</b>
LNRS:	The characteristics of the area are established in a range of existing evidence, including Sustainability Appraisals covering Worcestershire. The LNRS is intended to generate effects which improve the character of the area. The probability of the effects is difficult to predict, as they will rely on a range of stakeholders and other parts of the planning process to be realised, but it is considered likely that beneficial effects will be realised. The duration of such effects should be long-term. Frequency will

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<sup>14</sup> Planning Advisory Service: Nature Recovery Frequently Asked Questions, available at <https://www.local.gov.uk/pas/topics/environment/nature-recovery-local-authorities/nature-recovery-faqs>.



depend on how many opportunities arise, and may vary. The effects should be permanent.

**Criterion 2 (b): Characteristics of the effects and of the area likely to be affected, having regard, in particular, to the cumulative nature of the effects**

LNRS: The cumulative nature of the effects is unclear at this stage, although it is anticipated that the LNRS will play a beneficial role alongside other local and national planning and non-planning initiatives to advance nature recovery and, as such, the cumulative effects should be positive.

**Criterion 2 (c): Characteristics of the effects and of the area likely to be affected, having regard, in particular, to the transboundary nature of the effects**

LNRS: "Transboundary" in this sense refers to other Member States. Such effects are considered unlikely to arise from the LNRS.

**Criterion 2 (d): Characteristics of the effects and of the area likely to be affected, having regard, in particular, to the risks to human health or the environment (for example, due to accidents)**

LNRS: The LNRS is not considered likely to give rise to risks to human health or the environment. Rather, the LNRS is likely to generate benefits, with Defra's LNRS guidance stating that *"recovering or enhancing biodiversity does not just benefit the natural environment. For example, improving biodiversity can help increase land value or support people's health and wellbeing and access to nature."*<sup>15</sup>

**Criterion 2 (e): Characteristics of the effects and of the area likely to be affected, having regard, in particular, to the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)**

LNRS: The LNRS covers the administrative area of Worcestershire, which is around 173,500 hectares. The population of Worcestershire is approximately 603,600<sup>16</sup>. The LNRS could affect land in any part of the county, including urban areas. It could also help to address socio-economic inequalities in accessing nature and could contribute to meeting the government's commitment that everyone should live within 15 minutes' walk of a green or blue space.<sup>17</sup>

**Criterion 2 (f) (i): Characteristics of the effects and of the area likely to be affected, having regard, in particular, to the value and**

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<sup>15</sup> Department for Environment, Food & Rural Affairs (March 2023) 'Local nature recovery strategy statutory guidance: What a local nature recovery strategy should contain', paragraph 56.

<sup>16</sup> Office for National Statistics, Population change between 2011 and 2021, local authorities in England and Wales.

<sup>17</sup> Environmental Improvement Plan 2023.

**vulnerability of the area likely to be affected due to (i) special natural characteristics or cultural heritage**

LNRS: Worcestershire benefits from a rich natural and cultural heritage, which is well documented, including in existing Sustainability Appraisals for the county. The special natural characteristics of the county include the fact that it encompasses the southern limit of many northern plant and animal species, and the northern limit of many southern species<sup>18</sup>. It includes parts of the Wyre Forest, the largest native woodland in England<sup>19</sup>, and holds over 20% of England’s resource of surviving neutral hay-meadow grasslands<sup>20</sup>. The LNRS will positively contribute to the conservation and enhancement of the county’s special natural characteristics, and may have indirect effects on cultural heritage.

**Criterion 2 (f) (ii): Characteristics of the effects and of the area likely to be affected, having regard, in particular, to the value and vulnerability of the area likely to be affected due to (ii) exceeded environmental quality standards or limit values**

LNRS: There are recognised exceedances of environmental quality standards in Worcestershire. These are well documented in existing Sustainability Appraisals covering the county. These include watercourses failing to meet Water Framework Directive standards, and Air Quality Management Areas where NO<sub>2</sub> emissions are too high. Condition monitoring of the county’s Sites of Special Scientific Interest shows that only 73% are in ‘favourable’ or ‘unfavourable recovering’ condition<sup>21</sup>. Despite a lack of recent data on the condition of Local Wildlife Sites, best available evidence indicates that these sites are also below the desired condition. Where the LNRS targets specific designated sites it will be likely to have a beneficial effect, but will also play a broader role in reversing biodiversity decline across the county.

**Criterion 2 (f) (iii): Characteristics of the effects and of the area likely to be affected, having regard, in particular, to the value and vulnerability of the area likely to be affected due to (iii) intensive land-use**

LNRS: “Intensive land-use” is not defined in the Regulations or the Directive, and no detail on the matter is given in the official European Guidance. In the Worcestershire context, this screening statement considers the term to relate to uses that place unsustainable demands on natural resources and/or which compromise or have the potential to compromise the natural

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<sup>18</sup> Worcestershire County Council (2022) Worcestershire Minerals Local Plan, available at [https://www.worcestershire.gov.uk/sites/default/files/2022-11/Worcestershire\\_Minerals\\_Local\\_Plan\\_2018\\_2036\\_.pdf](https://www.worcestershire.gov.uk/sites/default/files/2022-11/Worcestershire_Minerals_Local_Plan_2018_2036_.pdf).

<sup>19</sup> Forestry England (2022) ‘Wyre Forest National Nature Reserve now the largest native woodland in England’, available at <https://www.forestryengland.uk/news/wyre-forest-national-nature-reserve-now-the-largest-native-woodland-england>.

<sup>20</sup> Estimated to be 7,282ha by Rodwell et al in 2007 (in Worcestershire Biodiversity Partnership (2008) Biodiversity Action Plan for Worcestershire).

<sup>21</sup> Natural England, SSSI Condition Summary, accessed July 2023, available at <https://designatedsites.naturalengland.org.uk/SearchCounty.aspx>.

environment. There is no evidence base providing detailed statistics on what and where land occurs in Worcestershire that is subject to intensive land-use, but the LNRS will help to promote habitat restoration and making space for nature.

<b>Criterion 2 (g):</b>	<b>The effects on areas or landscapes which have a recognised national, Community or international protection status.</b>
LNRS:	There are several areas and landscapes in Worcestershire which enjoy national or Community protection status, including two Special Areas of Conservation, 114 Sites of Special Scientific Interest, and parts of two Areas of Outstanding Natural Beauty. The LNRS will encourage protection of these sites through its local habitat map, and would be expected to lead to direct and indirect benefits from interventions within and beyond their boundaries.

## 5. Conclusion

5.1 The findings set out above demonstrate that, on balance, the Local Nature Recovery Strategy will not have significant environmental effects and that Strategic Environmental Assessment is not required.

## 6. Next steps

6.1 In accordance with Regulation 9(2)(b), WCC is consulting the three statutory consultation bodies (Natural England, Historic England, and the Environment Agency) on this draft statement.

6.2 WCC will take the responses from the consultation bodies into account in making the final determination under Regulation 9(1). If WCC determines that the LNRS is likely to have significant environmental effects, an environmental assessment will be produced. If WCC determines that the LNRS is not likely to have significant environmental effects, a statement of reasons for this determination will be produced under Regulation 9(3).

## **Annex 2: Responses from consultation bodies**

## Consultation response from Natural England

From: SM NE-Plan Cons Area Team (West Midlands) (NE) <[consultations.westmidlands@naturalengland.org.uk](mailto:consultations.westmidlands@naturalengland.org.uk)>  
Sent: 14 August 2023 14:38  
To: Ecology <[ecology@worcestershire.gov.uk](mailto:ecology@worcestershire.gov.uk)>  
Subject: [EXTERNAL]444240 Local Nature Recovery Strategy SEA Screening Worcestershire County Council

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Dear Cody,

Thank you for the email. I can confirm that Natural England agrees with the conclusion in the screening statement on the requirement for Strategic Environmental Assessment (SEA) of the Worcestershire LNRS that an SEA is not needed.

Kind Regards

Rob Sargent

Team Leader – West Mids  
Natural England

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

<[mailto:consultations@naturalengland.org.uk](mailto:mailto:consultations@naturalengland.org.uk)>

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

## Consultation response from Historic England



Historic England

Mr Cody Levine  
Worcestershire County Council

Direct Dial: 0121 625 6887

Our ref: PL00793706  
21 August 2023

Dear Mr Levine

### WORCESTERSHIRE LOCAL NATURE RECOVERY STRATEGY- SEA SCREENING

Thank you for your consultation and the invitation to comment on the SEA Screening Document for the Worcestershire Local Nature Recovery Strategy (LNRS).

For the purposes of consultations on SEA Screening Opinions, Historic England confines its advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage.

Our comments are based on the information supplied with the screening request. On the basis of the information supplied and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of the 'SEA' Directive], Historic England concurs with your view that the preparation of a Strategic Environmental Assessment is not required.

The views of the other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. If a decision is made to undertake a SEA, please note that Historic England has published guidance on Sustainability Appraisal / Strategic Environmental Assessment and the Historic Environment that is relevant to both local and neighbourhood planning and available at: <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

I trust the above comments will be of help in taking forward the LNRS.

Yours sincerely,

P. Boland.

Peter Boland  
Historic Places Advisor  
[peter.boland@HistoricEngland.org.uk](mailto:peter.boland@HistoricEngland.org.uk)

cc:



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6555  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

## Consultation response from the Environment Agency

Worcestershire County Council  
Planning Policy  
County Hall Spetchley Road  
Worcester  
Worcestershire  
WR5 2NP

**Our ref:** SV/2012/106682/OR-03/PO1-L01

**Your ref:**

**Date:** 22 August 2023

**FAO: Cody Levine**

Dear Cody

### **Worcestershire Local Nature Recovery Strategy Strategic Environmental Assessment Screening**

Thank you for your consultation of the above Local Nature Recovery Strategy (LNRS) Strategic Environmental Assessment (SEA) screening (dated July 2023).

We have previously provided comments to Worcestershire County Council with regard to sensitive ecological features in the Worcestershire County Area appropriate to our role and responsibilities, such as migratory fish.

We note the overarching principles of the LNRS and would be happy to comment further upon the aspects appropriate to our role when consulted upon the Issues and Options document.

An important feature of LNRSs is that in addition to considering priorities for nature recovery, they also include "nature based" solutions to address wider environmental issues. These environmental issues will be informed by national and local environmental objectives, and includes:

- climate change mitigation and adaptation
- flood risk
- water quality
- water resources

This broader ambition will help better join up efforts to address interrelated environmental issues, to avoid conflicts (or address them transparently where this is not possible) and to maximise multiple benefits. It also creates an important potential role for LNRSs in targeting the use of nature-based solutions to where they will have most benefit. For example use of nature-based solutions to reduce flooding or restoration of our upland and lowland peatlands, so that they deliver benefits for nature and the climate.

Environment Agency  
Hafren House Welshpool Road, Shelton, Shrewsbury, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

At this stage, we agree with the drawn conclusion that a SEA is not required.

In consideration of the above Worcestershire County Council should be satisfied, in consultation with Natural England and the Forestry Commission, that this approach is viable and that there is a reasonable degree of certainty provided.

We have designed a suite of Guidance along with our colleagues at DEFRA to assist in the preparation of LNRs. Please see the following links to assist you in the preparation of your plan:

- [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Local nature recovery strategy statutory guidance \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)
- [Local nature recovery strategies: the preparation process and contents government response and summary of responses \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)
- [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

We would welcome the chance to comment further and provide some more substantive comments upon receipt of the Issues and Options document.

Yours faithfully

**Mr. Matt Bennion**  
**Planning Specialist**

Direct e-mail [matthew.bennion@environment-agency.gov.uk](mailto:matthew.bennion@environment-agency.gov.uk)

End

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## Environmental Sustainability Full Impact Assessment

### Impact Assessment Id: #438

#### 1.0 Screening Information

##### Project Name

Foxlydiate First School

##### Name of Project Sponsor

Sarah Wilkins

##### Name of Project Manager

Rowanna Hughes

##### Name of Project Lead

Andy Moran

##### Please give a brief description of the project

Delivery of a new 2FE first school and nursery on a new housing development site in the Webheath District of Redditch.

##### Data Protection screening result

Does not need a full impact assessment

##### Equality and Public Health screening result

Will require a full impact assessment

##### Environmental Sustainability screening result

Will require a full impact assessment

## 1.1 Background and Purpose

### Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document. New housing being built in the Foxlydiate area will attract families with children, and this will create a demand for additional childcare and school places. The scale of the forecast increased demand means that a new first school is needed.

The new major housing development off Foxlydiate Lane will deliver 2,560 new houses by 2037. Worcestershire County Council is proposing that the new school will open initially as a 3-form-entry in 2027, when it is forecast that 30 children in each school year group will live on the new development, increasing to over 60 by 2030. The school will open initially to Reception-aged children and will grow over time as it will take a new cohort of Reception children each September.

The number of children is predicted to double by the time the development is completed and fully occupied, so the school will be built to a model that can easily be expanded to include additional classrooms when they are needed. There are other housing developments in the area, each attracting more families with children, so there will be increased demand on places at existing schools nearby, and this is being monitored carefully to ensure that the right number of additional places will be created in the right places at the right time.

The delivery of a new school in the Foxlydiate area will ensure sufficient places in the locality and ensure an element of surplus which will ensure that:

families have an element of choice, and increases the likelihood that families receive one of their top two preferences  
all children who move into the locality during the school year are offered provision within 20 days; and  
all children who want to access a place in their local community are able to do so, reducing school travel times

The delivery of a new school provides an opportunity to build on the existing 'Good' first school provision in Redditch and offers more choice of schools, which is important to support our children and young people in achieving good attainment and realising their full potential.

### Upload Business Case or Support documents

No files uploaded

### Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

The project output will be a new 3FE first school in Redditch with a nursery. This will be delivered via a number of workstreams:

- Building the School - Procurement of external consultants and construction
- Education - Academy Sponsor selection and consideration of educational requirements of the school (e.g. inclusivity)
- Communication and engagement - stakeholder management and consultation
- Mitigating school places - ensuring sufficiency of school places in Redditch

### Project Outcomes

Briefly summarise what the project will achieve.

The key expected outcome is to meet the project aim of ensuring sufficiency of school places for first school age pupils in Redditch, with a 5% surplus of places. As a result of building a new first school in Redditch, various other outcomes are likely, which include:

Longevity of first school sufficiency in Redditch in line with housing growth  
A reduction in travel times and car use for first school age pupils in Redditch  
Certainty that all pupils in Redditch can attend a first school in their community  
Increase in jobs for school staff in Redditch

### Is the project a new function/service or does it relate to an existing Council function/service?

Existing

### Was consultation carried out on this project?

Yes

## 1.2 Responsibility

### Directorate/Organisation

Commercial and Change

### Service Area

Transformation and Commercial

## 1.3 Specifics

### Project Reference (if known)

Not Recorded

### Intended Project Close Date \*

September 2027

## 1.4 Project Part of a Strategic Programme

### Is this project part of a strategic programme?

Yes

### An overarching screening has already been carried out for the following areas:

Data Protection

Equality and Public Health

Environmental Sustainability

### What was the conclusion?

Data Protection assessment not required.

Equality and Public Health Impact Assessment to be completed

Environmental Sustainability Impact Assessment to be completed

### Upload previous impact assessment documents if available

No files uploaded

## 2 Greenhouse Gas Emissions

**Could the project result in an increase in GHG emissions (including CO2)? Yes**

Please be mindful that the Council has committed to reduce its GHG emissions to zero by 2050 and most projects are likely to have an impact on this target. This should be a key consideration in your project delivery and should be reviewed when completing the assessment.

**Please explain your answer below:**

The project will be designed to achieve a sustainable net zero carbon building in line with the Council's objectives by 2050.

Construction could produce greenhouse gases, but in the operation of the school we will use sustainable energy methods and consider opportunities throughout the project (procurement, meetings, materials storage to reduce delivery trips etc.). Sustainable heating systems will be used, such as Air and Ground Source Heat Pumps and other sustainable energy sources such as solar panels will be incorporated into the design to reduce the need for gas. Electricity requirements for these alternative heating systems are under review before the decision to remove the gas connection to the site is finalised.

Other considerations for reduced emissions include:

- Reduction of car use by delivering the school in the local community
- Ongoing review through design/delivery of opportunities for emissions reduction
- Site waste management

**Have you undertaken an assessment of the project to know if there will likely be an increase in GHG emissions? No**

**Please explain your answer below:**

Not recorded

### 3 Resources

**Will the project result in increased consumption of electricity, gas or other heating fuels? Yes**

e.g. project may require use of additional buildings, lighting and heating in buildings, additional ICT equipment, etc.

**Please explain your answer below:**

The delivery of a new school will result in an increase in consumption of electricity however, the school is required due to an increase in pupils. It is not yet confirmed whether gas will be connected to the school and this will be determined during the design process.

**Will the project reduce energy needs and result in reduced consumption? No**

e.g. disposal of WCC property assets

**Please explain your answer below:**

Not recorded

**Will the project require additional water resources leading to an increase in water consumption? Yes**

e.g. increased use of water through construction processes

**Please explain your answer below:**

Additional water will be required during the construction process, however the school design will incorporate water saving initiatives for the operation of the school.

We will seek to:

Low water use/ waterless fittings and appliances, while considering maintenance challenges

Provide sub metering to monitor high water use areas/ equipment

Recycled rainwater for irrigation

Recycled rainwater for flushing WCs & other potable water uses - review embodied impact and LCC

Recycled greywater for irrigation - review feasibility and embodied impact.

Grey water management - reed beds etc

Identify a surface water strategy with measures to mitigate climate change beyond statutory requirements, integrated within green infrastructure strategy.

Sustainable Urban Drainage to support biodiversity while supporting site surface water strategy - swales/ green roofs etc

Increase permeable surfaces for climate resilience

Other initiatives

**Might there be a decrease in water consumption? Yes**

e.g. will the project involve water saving measures or initiatives

**Please explain your answer below:**

Although this will be a new building, we will seek to mitigate against the additional demand on water supply through implementing the following measures:

Low water use/ waterless fittings and appliances, while considering maintenance challenges

Provide sub metering to monitor high water use areas/ equipment

Recycled rainwater for irrigation

Recycled rainwater for flushing WCs & other potable water uses - review embodied impact and LCC

Recycled greywater for irrigation - review feasibility and embodied impact.

Grey water management - reed beds etc

Identify a surface water strategy with measures to mitigate climate change beyond statutory requirements, integrated within green infrastructure strategy.

Sustainable Urban Drainage to support biodiversity while supporting site surface water strategy - swales/ green roofs etc

Increase permeable surfaces for climate resilience

Other initiatives

**Will the project result in the use of other resources, materials or minerals? Yes**

e.g. use of natural resources such as wood; or use of aggregate minerals?

**Please explain your answer below:**

We will be seeking to use local resources wherever possible to reduce project resource requirements and reduce risk

## 4 Transport

**Will the project result in more people needing to travel? No**

e.g. will there be additional cars on the road

**Have alternative transport modes been considered? Yes**

e.g. could use be made of public transport/walking/cycling etc.

**Please explain your answer below:**

The new school will cater for new housing developments in the area so a key outcome for the project is for families to have access to a first school in their local community. This will seek to reduce travel by car and enable more pupils to travel to school by active travel routes, including walking and cycling.

## 5 Waste

**Is there likely to be an increase in waste as a result of the project? Yes**

e.g. construction waste, packaging waste etc.

**Please explain your answer below:**

This project will result in construction waste as part of the construction phase. Options for mitigating this aspect will be fully explored during the pre-planning and pre-construction phases.

**Have opportunities to prevent, minimise, reuse or recycle waste been identified and considered? Yes**

e.g. will recycling facilities be available as part of the project

**Please explain your answer below:**

Opportunities to prevent, minimise, reuse or recycle waste when the building is operational will be considered at an early stage in development, to ensure there is adequate bin storage facilities to deal with segregation of waste to enable ease of recycling, and also to allow for recycling areas within the classrooms/communal areas as appropriate. Waste storage areas will be designed to be adaptable to accommodate changing legislative requirements such as the segregation of food waste.

## 6 Wildlife and Biodiversity

**Will there be any negative impacts on the natural environment? Yes**

e.g. will the project involve removal of green space/trees; have wildlife surveys been considered; result in enhancements to green infrastructure; increased biodiversity opportunities etc.?

**Please explain your answer below:**

Full ecological and environmental surveys will be undertaken by the developer to reduce disruption to protected trees and habitats where possible.

As part of the school design we will be looking to utilise and enhance the natural environment wherever possible. We will seek to comply with Biodiversity Net Gain requirements in creating new habitats to offset any loss of biodiversity resulting from the build. These new habitats would also provide opportunities for educational learning and enhanced mental wellbeing. The existing site is utilised as agricultural land which has limited biodiversity, therefore any new grassland, trees and habitat that are planted for the school will enhance the biodiversity of the site.

**Has a preliminary ecological appraisal been undertaken? Yes**

**Please explain your answer below:**

Undertaken by the developer.

**Has there been consideration of statutory assessments? Yes**

e.g. Sustainability Appraisals, Strategic Environmental Assessments and Habitat Regulations Assessment Screening?

N.B. This is a matter of legal compliance - All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. This consideration – typically referred to as the 'Habitats Regulations Assessment screening' – should take into account the potential effects both of the plan/project itself and in combination with other plans or projects.

**Please explain your answer below:**

Yes, these will be undertaken in line with what the planning application requirements.



## 7 Pollution to land/air/water

**Is there a risk of pollution to the local environment? No**

e.g.

- will there be surface water run-off or discharge into local water source?
- will there be any impact on local water quality?
- will any waste water require treatment?
- is there the potential for spillage of chemicals?
- is there the potential for emissions to air from combustion processes resulting in poor air quality?

## 8 Resilience to climate risks

**Could climate risks affect your project? Yes**

N.B. some projects may be more sensitive to future changes in the climate e.g. hotter and drier summers; milder and wetter winters; increased likelihood of extreme weather events. These climate risks may affect project delivery and should be considered at the early stages of project development.

**Please explain your answer below:**

This building is anticipated to be in use for the next several decades and therefore is likely to be impacted by climate risks. Temperature management (heating and cooling systems) will be required for the building and likely temperatures in future years will be considered

**Has the impact of extreme weather events on the project been considered? Yes**

e.g. heat waves and flooding.

**Please explain your answer below:**

Due to excessive temperatures that are already being experienced in the current climate, sustainable heating and cooling systems will be considered such as Air or Ground Source Heat Pumps that can help regulate the temperature of the building.

An initial flood risk assessment suggests the site has a low flood risk.

**Is there a business/project continuity plan in place to ensure climate risks are minimised? No**

e.g. can you ensure that the project is resilient to climate risks and can continue to deliver on outcomes.

**Could the project exacerbate climate risks? No**

e.g. increase flood risk or worsen temperature extremes in the locality.

**Will the project result in the use of other resources, materials or minerals? Yes**

e.g. use of natural resources such as wood; or use of aggregate minerals?

**Please explain your answer below:**

We will be seeking to use local resources wherever possible to reduce project resource requirements and reduce risk

## 9 Historic Environment

**Have you checked with the WCC Historic Environment team as to whether there are any impacts on the Historic Environment (negative or positive)?**

**No**

Check every development with the Historic Environment Team at the planning stage of each project. Further assessment may be required depending on the nature and scale of development. There may also be design options that would negate any need for further assessment (and lessen costs), or even opportunities to enhance heritage assets or their setting through the development.

**Does the development have the potential to result in any impacts to the historic environment or opportunities for enhancement?**

**Yes**

If yes, then further assessment will be required. This could take the form of a watching brief during groundworks if the potential is clearly understood and relatively low, or a more comprehensive desk-based and/or field investigation prior to development.

**Please explain your answer below:**

The relevant archaeological surveys will be undertaken as part of the pre-planning process.

## 10 Procurement

**Could any procurement associated with the project have a detrimental environmental impact? Yes**

e.g. procurement of goods from overseas that have to be shipped; use of unsustainable materials or materials that cannot be recycled at the end of their use?

**Please explain your answer below:**

Unable to answer at this stage but our aspiration is to use local materials and avoid importing materials.

**Is there likely to be increased Greenhouse Gas emissions from products purchased for the project? No**

e.g. carbon emissions from transport and manufacturing

**Will you be able to make use of sustainable products? Yes**

e.g. recycled, local, ethical etc.

**Please explain your answer below:**

Unable to answer at this stage but our aspiration is to use sustainable materials.

**Have you considered the Public Services (Social Value) Act 2012? Yes**

All major contracts let by the Council (those of more than £100,000 in total value) will be expected to deliver a meaningful contribution to our vision of Social Value in the county. The Act requires us to consider how the services we commission and procure might improve the economic, social and environmental well-being of the local area.

– please see: [Social Value](#)

**Please explain your answer below:**

Contributing to the vision of social values will be considered in the next stage, including the provision of new jobs and apprenticeships.

## 11 Declaration

**I have confirmed that to the best of my knowledge that the information I have provided is true, complete and accurate**

**I have confirmed that I will make sure that Environmental Sustainability has been and continues to be considered throughout the project life cycle and should circumstances change in the project a further Environmental Sustainability Assessment Screening will be carried out.**

## 12 Application Details

**Last Updated Date Time**

18/09/2023 15:13:28

**Screening Submitted Date Time**

18/04/2023 13:40:40

**Last Reopened Date Time**

18/09/2023 13:52:33

**Full Impact Submitted Date Time**

18/09/2023 14:52:12

**Approved/Rejected Date Time**

18/09/2023 15:13:28

**Current User Dashboard Request Status**

Complete

### 13.0 People with access to the original screening

[Alexandra Lee \(ALee6@worcestershire.gov.uk\)](mailto:ALee6@worcestershire.gov.uk)

[Daria Silva \(DSilva@worcestershire.gov.uk\)](mailto:DSilva@worcestershire.gov.uk)

[Nicola Parkin \(NParkin1@worcschildrenfirst.org.uk\)](mailto:NParkin1@worcschildrenfirst.org.uk)

[Rachel Kiernan \(rkiernan@worcschildrenfirst.org.uk\)](mailto:rkiernan@worcschildrenfirst.org.uk)

[Rowanna Hughes \(RHughes2@worcestershire.gov.uk\)](mailto:RHughes2@worcestershire.gov.uk)

[Sarah Wilkins \(swilkins@worcschildrenfirst.org.uk\)](mailto:swilkins@worcschildrenfirst.org.uk)

### 13.1 People with access to this environmental sustainability assessment

[Alexandra Lee \(ALee6@worcestershire.gov.uk\)](mailto:ALee6@worcestershire.gov.uk)

[Daria Silva \(DSilva@worcestershire.gov.uk\)](mailto:DSilva@worcestershire.gov.uk)

[Nicola Parkin \(NParkin1@worcschildrenfirst.org.uk\)](mailto:NParkin1@worcschildrenfirst.org.uk)

[Rachel Kiernan \(rkiernan@worcschildrenfirst.org.uk\)](mailto:rkiernan@worcschildrenfirst.org.uk)

[Rowanna Hughes \(RHughes2@worcestershire.gov.uk\)](mailto:RHughes2@worcestershire.gov.uk)

[Sarah Wilkins \(swilkins@worcschildrenfirst.org.uk\)](mailto:swilkins@worcschildrenfirst.org.uk)

## 14 Direct Questions

### Question:

Hi just a few things to address before I can sign this off. Can you address the point below and incorporate where you are able to please?

Section 2: Could the project result in an increase in GHG emissions (including CO2)?

The project will indeed need to be delivered against the net zero target of 2050 and rather than aiming for this needs to be designing for this from the start. UK infrastructure is already gearing up for new builds to not have gas connections from 2025 to reflect legislation. Possibly give suggestions what heating is going to be utilised / shortlisted at this point as opposed having gas as a fall back. Precedent set in the Newtown Road school development, I understand the development has already decided to not connect to gas.

Section 3: Might there be a decrease in water consumption? Consider changing to yes. (see your response to previous question). As this is a new building this will additional demand on the water supply. Possible to mitigate against this by use of grey water systems.

Section 5: Have opportunities to prevent, minimise, reuse or recycle waste been identified and considered? Also important to recognise waste service change – food waste will likely be a segregated fraction once this facility is built so waste storage areas must be adaptable to changing legislative requirements.

Section 6: Will there be any negative impacts on the natural environment? Is there opportunity to mitigate against the negative impact on biodiversity during the build period by development of the outdoor space? Creation of habitats designed in the outdoor space would benefit biodiversity as well as provide opportunities for educational learning and mental wellbeing.

Section 8: excessive temperatures are already a feature of our current climate consider strengthening response. Mitigation against impacts of heat on building users is a must even in current climate.

Regards, Anna Wardell-Hill  
Sustainability Team

Asked by Anna Wardell-Hill (AWardellHill@worcestershire.gov.uk) at 18/09/2023 13:52:27

Alexandra Lee (ALee6@worcestershire.gov.uk), Daria Silva (DSilva@worcestershire.gov.uk), Nicola Parkin (NParkin1@worcestershire.gov.uk), Rowanna Hughes (RHughes2@worcestershire.gov.uk), Rachel Kiernan (rkiernan@worcestershire.gov.uk), and Sarah Wilkins (swilkins@worcestershire.gov.uk) have been asked this question.

### Currently Unanswered

Add Response

## Equality and Public Health Full Impact Assessment

### Impact Assessment Id: #438

**1.0****Screening Information****Project Name**

Foxlydiate First School

**Name of Project Sponsor**

Sarah Wilkins

**Name of Project Manager**

Rowanna Hughes

**Name of Project Lead**

Andy Moran

**Please give a brief description of the project**

Delivery of a new 2FE first school and nursery on a new housing development site in the Webheath District of Redditch.

**Data Protection screening result**

Does not need a full impact assessment

**Equality and Public Health screening result**

Will require a full impact assessment

**Environmental Sustainability screening result**

Will require a full impact assessment

## 1.1 Background and Purpose

### Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document. New housing being built in the Foxlydiate area will attract families with children, and this will create a demand for additional childcare and school places. The scale of the forecast increased demand means that a new first school is needed.

The new major housing development off Foxlydiate Lane will deliver 2,560 new houses by 2037. Worcestershire County Council is proposing that the new school will open initially as a 3-form-entry in 2027, when it is forecast that 30 children in each school year group will live on the new development, increasing to over 60 by 2030. The school will open initially to Reception-aged children and will grow over time as it will take a new cohort of Reception children each September.

The number of children is predicted to double by the time the development is completed and fully occupied, so the school will be built to a model that can easily be expanded to include additional classrooms when they are needed. There are other housing developments in the area, each attracting more families with children, so there will be increased demand on places at existing schools nearby, and this is being monitored carefully to ensure that the right number of additional places will be created in the right places at the right time.

The delivery of a new school in the Foxlydiate area will ensure sufficient places in the locality and ensure an element of surplus which will ensure that:

families have an element of choice, and increases the likelihood that families receive one of their top two preferences  
all children who move into the locality during the school year are offered provision within 20 days; and  
all children who want to access a place in their local community are able to do so, reducing school travel times

The delivery of a new school provides an opportunity to build on the existing 'Good' first school provision in Redditch and offers more choice of schools, which is important to support our children and young people in achieving good attainment and realising their full potential.

### Upload Business Case or Support documents

No files uploaded

### Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

The project output will be a new 3FE first school in Redditch with a nursery. This will be delivered via a number of workstreams:

- Building the School - Procurement of external consultants and construction
- Education - Academy Sponsor selection and consideration of educational requirements of the school (e.g. inclusivity)
- Communication and engagement - stakeholder management and consultation
- Mitigating school places - ensuring sufficiency of school places in Redditch

### Project Outcomes

Briefly summarise what the project will achieve.

The key expected outcome is to meet the project aim of ensuring sufficiency of school places for first school age pupils in Redditch, with a 5% surplus of places. As a result of building a new first school in Redditch, various other outcomes are likely, which include:

Longevity of first school sufficiency in Redditch in line with housing growth  
A reduction in travel times and car use for first school age pupils in Redditch  
Certainty that all pupils in Redditch can attend a first school in their community  
Increase in jobs for school staff in Redditch

### Is the project a new function/service or does it relate to an existing Council function/service?

Existing

### Was consultation carried out on this project?

Yes

## 1.2 Responsibility

### Directorate/Organisation

Commercial and Change

### Service Area

Transformation and Commercial

## 1.3 Specifics

### Project Reference (if known)

Not Recorded

### Intended Project Close Date \*

September 2027

## 1.4 Project Part of a Strategic Programme

### Is this project part of a strategic programme?

Yes

### An overarching screening has already been carried out for the following areas:

Data Protection

Equality and Public Health

Environmental Sustainability

### What was the conclusion?

Data Protection assessment not required.

Equality and Public Health Impact Assessment to be completed

Environmental Sustainability Impact Assessment to be completed

### Upload previous impact assessment documents if available

No files uploaded

## 2 Organisations Involved

### Please identify the organisation(s) involved:

Worcestershire County Council

Other - Worcestershire Children First

### Details of contributors to this assessment:

<b>Name</b>	Rachel Kiernan
<b>Job title</b>	Group Manager Sufficiency and Place Planning
<b>Email address</b>	rkiernan@worcschildrenfirst.org.uk

### 3.0 Who will be affected by the development and implementation

Please identify group(s) involved:

Service User

Staff

Communities

Other - Contractors awarded the build of the school

### 3.1 Information and evidence reviewed

What information and evidence have you reviewed to help inform this assessment? \*

Demographic and forecast pupil level data

Forecast demand arising from new housing developments

### 3.2 Summary of engagement or consultation undertaken

Who and how have you engaged, or why do you believe engagement is not required? \*

A 4 week engagement exercise was undertaken inviting all stakeholders to explain what they feel is important in the delivery of a new First school in Foxlydiat and their opinion on key operational matters such as admissions. This was an online survey that was advertised on the website, local media, direct email, social media and through schools to engage with families and local residents.

### 3.3 Summary of relevant findings

Please summarise your relevant findings. \*

- Respondents were in support of the proposal to deliver a new school, with 48% strongly agreeing and 27% agreeing that a new first school is needed for Redditch. A further 9% neither agreed nor disagreed and 2% were unsure. Just 14% either disagreed or strongly disagreed with the proposal.
- The most important factors for respondents were that: pupils feel safe at the school, delivery of a broad curriculum including outdoor learning, and a focus on health and wellbeing.
- Respondents also strongly supported that the school should foster an environment of inclusivity and support, with specific provision for pupils with SEND.
- Respondents strongly felt that the school should be accessible by safe active travel routes to serve the local community, and to minimise impact on existing traffic congestion in the area.
- The school should have adequate drop off parking areas for parent carers to mitigate the impact on local residents and ensure safety of pupils.
- The new school should be integrated within its new community by prioritising children living nearby in the admissions criteria.

## 4 Protected characteristics - Equality

Please consider the potential impact of this activity (during development & implementation) on each of the equality groups outlined below. **Please select one or more impact box(es) below for each equality group and explain your rationale.** Please note it is possible for the potential impact to be both positive and negative for the same equality group and this should be recorded. Remember to consider the impact on e.g. staff, public, patients, carers etc. who are part of these equality groups.

#### Age

Potential positive impact selected. Potential neutral impact selected.

Explanation of your reasoning:

Education provision for first school and nursery aged pupils (2-9yrs) - The school will cater for new families moving into the local housing development, so more children aged 2-9 will be able to attend a first school within their local community.



Children and families within the area will benefit from the new school, but based on age as a protected characteristic, this may have a positive and neutral impact.

People in this area or the surrounding areas, of working age will also benefit from this due to increased employment opportunities. Neutral as families may have children in other schools which may impact geographical or logistical issues with travel / transport.

### Disability

Potential positive impact selected. Potential neutral impact selected. Potential negative impact selected.

#### Explanation of your reasoning:

The school specification states that the chosen Academy Sponsor will be expected to show an inclusive approach to education for those with disabilities. It details the steps that should be taken to ensure inclusion with regard to the following:

- Active engagement with the SEND and Vulnerable Learner teams and the Virtual School in WCF
- Active engagement with the All Age Disability Services in WCF
- A behaviour policy that does not discriminate against pupils with SEND or vulnerable learners
- Funding
- Deployment of teaching assistants and support staff
- Appropriate training to support the individual needs of pupils
- Curriculum
- School/parent relationships
- SEND Governor
- Early Help pathway for early identification of need

Families, carers, visitors, staff and children will have their disability respected and policies and processes are in place for failing to adhere to The Equality Act 2010 and subsequent Public Sector Equality Duties.

Neutral as families may have children in other schools which may impact geographical or logistical issues with travel / transport.

### Gender reassignment

Potential neutral impact selected

#### Explanation of your reasoning:

Dignity, respect and adherence to fair treatment and inclusive policies must link to the inclusivity policy of the school, in particular gender and self identity.

Those who have been through, who are planning, or who are not considering a gender transition or reassignment, will be fairly and equitably treated, and supported where relevant, in line not only with statutory regulations, but within policy, school & council values, and a positive inclusion lens.

Families, carers, visitors, staff and children will have their gender identity respected and policies and processes are in place for failing to adhere to The Equality Act 2010 and subsequent Public Sector Equality Duties.

### Marriage and civil partnerships

Potential neutral impact selected.

#### Explanation of your reasoning:

The development and implementation of the new school is not anticipated to have an impact on marriage and civil partnerships.

### Pregnancy and maternity

Potential positive impact selected. Potential neutral impact selected.

#### Explanation of your reasoning:

The development and implementation of the new school will be positive and neutral for those who are pregnant or in a period of maternity (6 months following birth).

Positive due to a new school being able to accept the new child once turning school age in the new estate for those who are pregnant and living there.

Neutral as families may have children in other schools which may impact geographical or logistical issues with travel / transport.

### Race including travelling communities

Potential neutral impact selected.

#### Explanation of your reasoning:

**The development and implementation of the new school is not anticipated to have a specific impact on individuals of a particular race including travelling communities. Families, carers, visitors, staff and children will have their race, ethnicity and nationalities respected, and policies and processes are in place for failing to adhere to The Equality Act 2010 and subsequent Public Sector Equality Duties.**

**Religion and belief**

Potential neutral impact selected.

**Explanation of your reasoning:**

The development and implementation of the new school is not anticipated to impact on religion or belief. The school will not have a faith designation.

Families, carers, visitors, staff and children will have their religions or belief systems respected, and policies and processes are in place for failing to adhere to The Equality Act 2010 and subsequent Public Sector Equality Duties

**Sex**

Potential neutral impact selected.

**Explanation of your reasoning:**

The development and implementation of the new school is not anticipated to have an impact on sex. The school will be a mixed gender school. Staff, parents, carers and children of any and all sexes are welcomed and families, carers, visitors, staff and children will have their sex respected, and policies and processes are in place for failing to adhere to The Equality Act 2010 and subsequent Public Sector Equality Duties.

**Sexual orientation**

Potential neutral impact selected.

**Explanation of your reasoning:**

The school ethos is proposed to reflect the values of inclusion. Families, carers, visitors, staff and children will have their sexual orientation respected, and policies and processes are in place for failing to adhere to The Equality Act 2010 and subsequent Public Sector Equality Duties.

## 5 Characteristics - Public health

**Other vulnerable and disadvantaged groups**

Potential neutral impact selected.

**Explanation of your reasoning:**

None identified

**Health inequalities**

Potential positive impact selected.

**Explanation of your reasoning:**

The location of the school will enable more pupils to walk and cycle to school, improving mental health and wellbeing.

**Social and economic**

Potential positive impact selected. Potential neutral impact selected.

**Explanation of your reasoning:**

There will be additional employment opportunities through the construction of the new school and working at the new school

**Physical health**

Potential positive impact selected.

**Explanation of your reasoning:**

More children will be able to attend a first school within their local community. The location of the school will enable it to connect directly with walking and cycle paths. This will reduce car use, reduce travel times, and increase potential for using active travel routes to walk or cycle to school. This will improve physical activity, reduce risk of cardiovascular disease and obesity, and reduce risk of mental illness and social isolation. In order to maximise this we will explore options that may include:

- A separate cycle/walking access to the schools
- Well managed, raised, pelican crossing that prioritises pupils and cyclists particularly during school opening and finishing hours
- Ensure active travel routes are usable, enjoyable, and time effective to use
- Sufficient cycle parking on site which are secure and easily accessible

It will be important to ensure site safety during construction – this will be done by a full site risk assessment for construction and site

security.

The community use of sports facilities on the school site with provide residents in this part of Redditch access to sports facilities not currently located within their local community.

**Mental health and wellbeing**

Potential positive impact selected. Potential negative impact selected.

**Explanation of your reasoning:**

The location of the school will enable more pupils to walk and cycle to school, improving mental health and wellbeing. The school will also be located close to natural green spaces and benefit from natural ecology integrated into the design of the school, improving mental health and learning potential by proving opportunities to integrate natural habitats and places for growing within the curriculum.

The school specification will state that the Academy Sponsor is expected to have a strong approach to ensuring the health and wellbeing and pupils and teachers, in consideration of both physical and mental health. We would expect the chosen Sponsor to have:

- A clear policy which documents the approach to ensuring and improving pupil and staff health
- Safe spaces and quiet areas for pupils to access for counselling sessions or to support with emotional regulation or sensory needs
- Development opportunities for staff and a process for ensuring wellbeing is prioritised
- An ethos of pupil and staff wellbeing throughout policy and practice

The school will focus on community cohesion by providing community use of facilities after hours and prioritising pupils living nearby to the school to support social cohesion. The design of the school will be mindful of creating an attracting environment to create a sense of pride and satisfaction.

The project will also provide new employment opportunities for local people.

Potential negative impact:

Construction operations during the development stage including increased vehicle movement, noise etc. Disturbance and stress caused by construction activity could impact on mental health of nearby residents - Will consider options such as Limit the disturbance levels and Adjust the vehicle movement and operation hours to benefit surrounding communities.

**Access to services**

Potential positive impact selected.

**Explanation of your reasoning:**

This project will see the improved access to education places for children (aged 2-9) in Redditch. The project may also offer access to community facilities for the local residents, but this provision is yet to be determined.

**6 Actions to mitigate potential negative impacts**

<b>Risk identified</b>	Construction operations during the development stage including increased vehicle movement, noise etc. Disturbance and stress caused by construction activity could impact on mental health of nearby residents
<b>Actions required to reduce/eliminate negative impact</b>	Will consider options such as Limit the disturbance levels and Adjust the vehicle movement and operation hours to benefit surrounding communities.
<b>Who will lead this action</b>	The Main Contractor (not Yet Appointed)
<b>Timeframe</b>	December 2025 - March 2027

**How will you monitor these actions?**

Not recorded

## 7 When will you review this equality and public health estimate(EPHIA)?

At risk management points identified  
 Prior to planning application submission  
 Prior to construction commencement  
 Prior to school opening

## 8 Declaration

The following statement has been read and agreed:

- All public bodies have a statutory duty under the Equality Act 2010 to set out arrangements to assess and consult on how their policies and functions impact on the 9 protected characteristics: Age; Disability; Gender Reassignment; Marriage & Civil Partnership; Pregnancy & Maternity; Race; Religion & Belief; Sex; Sexual Orientation
- Our Organisation will challenge discrimination, promote equality, respect human rights, and aims to design and implement services, policies and measures that meet the diverse needs of our service, and population, ensuring that none are placed at a disadvantage over others
- All staff are expected to deliver and provide services and care in a manner which respects the individuality of service users, patients, carers etc, and as such treat them and members of the workforce respectfully, paying due regard to the 9 protected characteristics

I confirm to the best of my knowledge that the information I have provided is true, complete and accurate

I confirm that I will make sure that Equality and Public Health have been and continue to be considered throughout the project life cycle and that, if circumstances change in the project, a further Equality and Public Health Impact Assessment Screening will be carried out.

## 8 Application Details

### Last Updated Date Time

25/09/2023 09:21:05

### Screening Submitted Date Time

18/04/2023 13:40:40

### Last Reopened Date Time

20/09/2023 16:33:28

### Full Impact Submitted Date Time

21/09/2023 10:33:54

### Approved/Rejected Date Time

25/09/2023 09:21:05

### Current User Dashboard Request Status

Complete

## 9.0 People with access to the original screening

[Alexandra Lee \(ALee6@worcestershire.gov.uk\)](mailto:ALee6@worcestershire.gov.uk)  
[Daria Silva \(DSilva@worcestershire.gov.uk\)](mailto:DSilva@worcestershire.gov.uk)  
[Nicola Parkin \(NParkin1@worcschildrenfirst.org.uk\)](mailto:NParkin1@worcschildrenfirst.org.uk)  
[Rachel Kiernan \(rkiernan@worcschildrenfirst.org.uk\)](mailto:rkiernan@worcschildrenfirst.org.uk)  
[Rowanna Hughes \(RHughes2@worcestershire.gov.uk\)](mailto:RHughes2@worcestershire.gov.uk)  
[Sarah Wilkins \(swilkins@worcschildrenfirst.org.uk\)](mailto:swilkins@worcschildrenfirst.org.uk)

## 9.1 People with access to this equality and public health assessment

[Alexandra Lee \(ALee6@worcestershire.gov.uk\)](mailto:ALee6@worcestershire.gov.uk)  
[Daria Silva \(DSilva@worcestershire.gov.uk\)](mailto:DSilva@worcestershire.gov.uk)  
[Nicola Parkin \(NParkin1@worcschildrenfirst.org.uk\)](mailto:NParkin1@worcschildrenfirst.org.uk)  
[Rachel Kiernan \(rkiernan@worcschildrenfirst.org.uk\)](mailto:rkiernan@worcschildrenfirst.org.uk)  
[Rowanna Hughes \(RHughes2@worcestershire.gov.uk\)](mailto:RHughes2@worcestershire.gov.uk)  
[Sarah Wilkins \(swilkins@worcschildrenfirst.org.uk\)](mailto:swilkins@worcschildrenfirst.org.uk)

## 10 Direct Questions

### Question:

Hi Rowanna, could you clarify what the provision (if relevant) will / could be for disabled children at the school, please? Thanks.

Asked by Maddy Cameron (MCameron@worcestershire.gov.uk) at 21/09/2023 10:56:57

Alexandra Lee (ALee6@worcestershire.gov.uk), Daria Silva (DSilva@worcestershire.gov.uk), Nicola Parkin (NParkin1@worcschildrenfirst.org.uk), Rowanna Hughes (RHughes2@worcestershire.gov.uk), Rachel Kiernan (rkiernan@worcschildrenfirst.org.uk), and Sarah Wilkins (swilkins@worcschildrenfirst.org.uk) have been asked this question.

### Response:

Hi Maddy,

We can't say exactly what that provision will look like at this stage as we haven't yet appointed the Academy Trust who will operate the school. This will be unpicked in consultation with the Trust, WCF and the design team in the next stage. We have included the following statement in the school specification which outlines our expectations for the Trust's approach to education and inclusivity:

"The school must actively engage with the All Age Disability Service in Worcestershire Children First (WCF) and other professionals to support all areas of SEND and Inclusion. This will include proactive working as well as fulfilling statutory duties for pupils with SEND (including those receiving SEND Support and those with Education Health Care Plans (EHCPs))."

I hope this is sufficient for now.

Thanks,  
Rowanna

Rowanna Hughes (RHughes2@worcestershire.gov.uk) at 21/09/2023 11:12:40

Add Response

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