Sefton Local Plan

Sustainability Post Adoption Report

April 2017

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1. Introduction

Sefton Council adopted the Local Plan on 20 April 2017. In parallel with the preparation of the Local Plan, the Council has carried out a series of appraisals and consultation exercises in relation to the environment and sustainability to inform the development of policy. These studies are the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).

Under the European Parliament Directive 2001/42/EC, Councils are required to undertake formal Strategic Environmental Assessments (SEA) of plans and programmes which are likely to have significant effects on the environment or sustainability. This SEA Directive has been incorporated into the process of preparing DPDs [Local Plans] under the Environmental Assessment of Plans and Programmes Regulations 2004, and through guidance published by CLG in 2005. Sustainability Appraisals are a requirement of the Planning and Compulsory Purchase Act (2004) and incorporate the environmental requirements of an SEA, but broaden to also include social and economic considerations.

Through the SA process, significant effects can be predicted, evaluated, mitigated and monitored, whilst also ensuring that opportunities for public involvement are provided.

When a plan is adopted, the SEA Directive requires the authority responsible to make information available on how environmental and/or sustainability issues and consultation responses have been considered in preparing the plan, the reasons for choosing the plan in the light of other reasonable alternatives and how the plan's implementation will be monitored in the future. In this context, the specific environmental consultees are Natural England, the Environment Agency and English Heritage [Historic England].

This statement will therefore respond to these requirements and will introduce the purpose and importance of Sustainability Appraisals conducted for the Local Plan. This report should be read in conjunction with the:

- Sustainability Appraisal Scoping Report [SMBC, December 2012]
- Sustainability Appraisal of the Local Plan [part 1] [Aecom, July 2015]
- Sustainability Appraisal of the Local Plan [part2] [Aecom, July 2015]
- Sustainability Appraisal of Proposed Modifications [Aecom, December 2015]

Sustainability Appraisal

The Sustainability Appraisal seeks to identify the economic, social and environmental impacts of the Local Plan and suggests ways to mitigate negative impacts and maximise positive impacts. The SA operates in a five stage approach.

Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope
Stage B	Testing the Local Plan Objectives against the SA Framework, developing and refining options, predicting and assessing effects, identifying mitigation measures and developing proposals for monitoring
Stage C	Documenting the appraisal process
Stage D	Consulting on the Plan and SA Report
Stage E	Monitoring implementation of the Plan

Habitats Regulations Assessment

The requirement for Habitat Regulations Assessment (HRA) is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British Law by Regulation 48 of the Conservation (Natural Habitats) Regulations 1994 (as amended in 2007). The aim of an HRA is to "maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest" (Habitat Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.

The Habitats Directive applies a precautionary principle to protected areas and plans can only be approved if it has been demonstrated that there will no adverse effect on the integrity of habitat sites.

Local Plan Examination in Public

The Council's Sustainability Appraisal and Habitats Regulation Assessment were published alongside the Local Plan [July 2015]. The Examination Hearing Sessions, examining the soundness and legal compliance of the Plan, were held in November 2015 to January 2016. As a result of the hearings the Council made a series of main and additional [minor] modifications to ensure the soundness of the Local Plan. The modifications underwent a further SA and HRA assessment and were publically consulted on, alongside the modifications themselves. The hearings were reconvened in November 2016 to discuss the modifications. The Inspector then took these into consideration in preparing his final report.

The Inspector's Report [March 2017] concluded that the Sefton Local Plan was sound and legally compliant, subject to the implementation of a series of main modifications recommended by the Inspector. The report stated that "with the recommended Main Modifications set out in the Appendix, the Sefton Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework." Specific to this report, the Inspector deemed that the SA and the HRA

had both been carried out and were both adequate, thereby meeting those elements of the
legal requirements.

2. How Environmental Considerations have been integrated into the Local Plan

The Local Plan and the early stages of the SA process was prepared by Sefton Planning Officers, whilst the latter stages of the SA and HRA were carried out by the appointed consultants URS/Aecom. This means that although reports were produced in parallel, as a mutually informative and iterative process, the sustainability and habitats assessments maintained a degree of independence from the policy formation. This integrated process allowed the recommendations from the SA and HRA process to feed into and inform the Local Plan from the initial to final stages of its production. It also serves to provide an audit trail of the appraisal process.

The SA and HRA have been used to:

- develop and refine the Local Plan
- assess the positive and negative effects of the options
- identify and revise some of the options and consider mitigation measures that address the effects and achieve more sustainable outcomes
- select the most sustainable options

The SA and HRA began at the start of the Local Plan process with a Scoping Report which was subject to consultation with the statutory bodies English Heritage [now Historic England], Environment Agency and Natural England for a 5 week period.

To assess the impact of the Local Plan to sustainability in the Borough, a series of 20 sustainability objectives for the Borough were developed.

1	Encourage economic growth and investment
2	Reduce unemployment and skills
3	Support the Rural Economy
4	Maintain vibrant town, local and village centres.
5	Provide the required infrastructure to support growth.
6	Reduce inequalities and social deprivation
7	Reduce crime and improve safety
8	Meet Sefton's diverse housing needs
9	Provide better access to services and facilities, particularly by walking, cycling and
	public transport.
10	Provide environments that improve health and social care.
11	Strengthen communities and help people to be involved in decision making.
12	Mitigate and adapt to climate change.
13	Reduce the risk from flooding

14	Reduce pollution	
15	Reduce waste and the use of natural resources	
16	Protect Sefton's valued landscape, coast and countryside	
17	Bring back into use derelict and underused land and buildings.	
18	Protect and enhance biodiversity	
19	Protect and enhance Sefton's culture and heritage	
20	Provide a quality living environment.	

These objectives provided the framework for assessing sustainability in the Borough, as each of the options and policies in the Local Plan were assessed against the objectives in terms of their potential significant effects.

The involvement of the statutory consultees, with the addition of public consultation, continued throughout the preparation of the Local Plan. At each consultation stage, views were also invited on the SA and HRA, along with all other supporting documentation. Copies of the SA and HRA at each of the Local Plan preparation stages are available at https://www.sefton.gov.uk/planning-building-control/planning-policy-including-local-plan-and-modifications-and-neighbourhood-planning/local-plan-examination-library.aspx

3. How opinions expressed through Public consultation have been taken into account

A key component of the process is consultation with stakeholders, and consultation has been in accordance with:

- Article 6 of the European Directive 2001/42/EC
- Environmental Assessments of Plans and Programmes 2004
- Sefton Council's Statement of Community Involvement

There have been 5 consultation exercises that have involved sustainability appraisal, each running a minimum of 6 weeks [with the exception of the scoping stage which was 5 weeks only] – exceeding the statutory requirement for SEA/SA consultations. At each stage, the three key bodies (English Heritage, Environment Agency and Natural England) have been consulted and comments have helped to shape the development of the Local Plan.

At each stage of Plan preparation, all consultees (statutory, general and public) have been informed of the publication of new documents, including the SA and HRAs. The documents have been made available on the Council's website, at Council Offices and local libraries. The table below provides a summary of the sustainability consultations undertaken at each stage of the SA and Local Plan process.

Date	Plan making stage	SA Document
April 2009	Issues	Scoping Report [updated December
		2012]
May 2011	Options	Sustainability Appraisal
July 2013	Preferred Option	Sustainability Appraisal
July 2015	Publication	Sustainability Appraisal
June 2016	Modifications	Sustainability Appraisal
		Supplementary Report
April 2017	Adoption	Sustainability Appraisal Adoption
		Statement

Under the SEA Directive, the findings of the SA and the responses received to the consultation on the Plan must be taken into account by decision-makers. Representations made during consultation on the SA and HRA were recorded, analysed and, where appropriate, used to help inform and refine the Local Plan's proposals and policies. All of the representations received, and their responses, were made publically available. Feedback reports were also published to summarise comments which were received, and the Council's response to them.

Full details on the consultation processes of each stage can be found in the examination library https://www.sefton.gov.uk/media/757654/LP7-Statement-of-Consultation-Regulation-22-Statement-SMBC-July-2015-UPDATED-AUGUST-2015.pdf

4. What difference have the appraisal and consultation processes made?

Scoping Report

At the very start of the Local Plan process, a scoping stage was necessary to propose and agree the appraisal methodology and collate the information needed to carry this out. The appraisal needed to be set within the context of existing plans and policies and an understanding of the current baseline situation was essential to predict effects and identify key sustainability issues and problems.

Consultation sought to ensure the proposed methodology suitably identified all relevant plans, policies and objectives; contained relevant baseline information; identified sustainability issues and proposed an appropriate assessment framework and objectives. This first stage of consultation included the statutory consultation bodies and was also made available for public comment.

Changes made as a result of the appraisal

Not applicable at this stage. The scoping report stage set the context for future appraisals.

Changes made as a result of consultation

The key changes made at this stage were the addition of background documents for review. This clarified a number of policy areas that the statutory bodies considered relevant to the appraisal process. The addition of a number of documents for review supported the identification of the SA objectives but also helped to clarify a number of the questions that would be used to carry out the appraisal. The comments also helped to guide the Council in what baseline data was needed to demonstrate the impact of the Local Plan. The data that was recommended and accepted at this stage was greater emphasis on ecological and environmental information.

Options [May 2011]

The Options paper set out the principles for future development across Sefton. Importantly this included three options for the future levels of growth for homes and employment.

These were:

Option One – Urban Containment

This would seek to limit the number of homes and land for jobs to sites within the existing urban area.

Option Two - Meeting Identified Needs

This option would seek to identify enough land to meet the projected housing need [at that time] of 480 homes each year and for an additional 25 hectares of employment land in the Green Belt.

Option Three - Stabilising Sefton's Population

This option sought to maintain Sefton's population at the current [2010] levels, i.e. 272,000. At the time it was estimated this would require 650 homes per year. An additional 25 hectares in the Green Belt for employment land [as Option Two] was also proposed.

Comments were sought on the options paper and a sustainability appraisal was published and made available alongside it.

Changes made as a result of the appraisal

The appraisal identified the main pros and cons for each of the options. These were set out in a report that supported the options paper. The appraisal process helped to inform the Options Paper by clarifying the likely implications of implementing each of the identified options. The appraisal process, which was done using the SA framework which had been agreed at the previous stage, also ensured that all topic areas from SA framework where addressed in the Options Paper. This enabled a comprehensive comparison to be undertaken between the main options and enabled all those who wished to make comments to do so with a full understanding of the merits of each option.

Changes made as a result of consultation

Whilst there were minimal comments to the actual SA of the options paper, the Options Paper itself was subject to substantial comments. These comments were just as relevant to the appraisal process as well as the Options Paper itself.

One of the main comments the Council received at this stage was the importance that local people gave to high quality agricultural land and the need to protect this from development. The Council ensured that the within the agreed SA framework that agricultural land quality was included. This stage also clarified the importance that protecting landscape, ecology and reducing the risk from flooding was to local residents. This helped to ensure that these issues were to be given due weight in subsequent stages of the Local Plan and appraisal processes. To support these concerns, additional studies were commissioned to look in greater detail for specific issues in Sefton. For example an Agricultural Land Assessment was undertaken in 2012 and a Strategic Flood Risk Assessment was undertaken in 2013.

As the next stage of the plan making process would look at the potential sites to help deliver the development needed for the Local Plan strategy. This included looking at sites in the Green Belt. The comments received at the Options stage helped inform the methodology for assessing Green Belt sites in the borough.

Preferred Options [June 2013]

The Council's Preferred Option for its Local Plan was broadly consistent with Option Two from the previous Options Stage. This was to meet identified needs as close as possible

were those needs derive. The Preferred Options was consulted on for 12 weeks. A sustainability appraisal was published alongside the Preferred Option document and was also subject to a 12 week consultation.

Changes made as a result of the appraisal

The Green Belt site selection process, which had been informed by the SA framework, was used to identify the most sustainable sites in the Green Belt to enable the Council to meet its identified needs. The previous Options Stage had identified a long list of potential sites in the Green Belt. The appraisal process helped to choose the preferred locations for growth in the borough, highlight potential harmful impacts that would need to be mitigated [this was done through generic and site specific policies] and identify areas were benefits could be maximised.

The key findings of the appraisal at this stage was for recommendations that the Local Plan should:

- Try to secure businesses that require large number of employees. Seek ways to improve access to new employment areas, particularly from deprived areas.
- Seek to maximise the number of affordable homes that are provided.
- Allocate land for new homes in areas that are most accessible, or are capable of being made accessible, by public transport, walking and cycling.
- Set out the infrastructure improvements that are required and be clear how these will be provided and when.
- Seek to encourage greater use of public transport to reduce the reliance on the car to offset any congestion, pollution etc.
- Provide clear and strong design policies for all developments, with particular care to respect the character of existing local neighbourhoods, both in terms of the buildings and landscape.
- Avoid areas with the greatest risk from flooding. Areas that have severe problems with surface water flooding should be avoided and uses as areas of open spaces as part of larger developers if suitable. Sustainable drainage systems should be used on site and any development should not increase the surface water run-off.
- Maximise sites in the urban areas so as to reduce the need to release land in the Green Belt

These recommendations were taken forward through amending policies, particularly the site specific policies, and given due weight in the site selection methodology to issues that had been identified.

Changes made as a result of consultation

As with previous consultation stages, the appraisal work itself garnered very little comment. However, the results of the site selection, which reflected the priorities identified in the sustainability appraisal, received significant comment. These comments were on a range of issues, such as flood risk, agricultural land quality, access, infrastructure and ecology.

The comments made were used to streamline the site selection methodology [to select sites for publication] to fully take into account the range of issues that were raised at this stage. The information used at this stage also supplemented the information that the Council held and which was used in the site selection methodology.

At this stage the policies in the Local Plan had emerged through significant discussion and analysis of environmental information. The scope for the appraisal process and the consultation on the appraisal to make significant amendments to the emerging policies was limited. It was also hard to differentiate between comments to the Preferred Options document itself and the SA process. The process of sustainability appraisal at this stage was so intertwined with plan making that comments were viewed in the context of both. This was a pragmatic approach as it ensured that comments were not compartmentalised for the Local Plan and appraisal process and each approach informed each other.

Publication [July 2015]

The Council finalised their Publication document and undertook a further SA and HRA on the document before its submission to the Planning Inspectorate in August 2015. A consultation exercise was conducted on the Publication document and its supporting documents, including the SA and HRA. All comments which were received as part of the formal representation stage were passed to the Planning Inspector for his consideration.

Changes made as a result of the appraisal

The information gathered at the previous stages helped to clarify the site selection methodology to fully accord with the principles of sustainability and to bring it completely in line with the Council's sustainability appraisal process. The site assessment/appraisal process determined which sites would be allocated in the Local Plan to meet Sefton's identified development needs.

Changes made as a result of consultation

At this stage all comments received, both to the Local Plan itself and the sustainability appraisal, were sent to the Planning Inspector to consider. During and following the examination hearings the Inspector suggested a number of modifications, which in part addressed the comments made to the sustainability appraisal process. As with other stages comments made to the Local Plan itself generally covered issues of sustainability and were therefore applicable to the appraisal process. The Inspector's findings and the proposed modifications were published in May 2017.

Modifications [November 2015]

Following the Examination in Public hearings held in November 2015 to January 2016, the Planning Inspector recommended that a number of modifications were required to ensure the soundness of the Plan. In preparing these Main Modifications, the Council assessed each of the proposed changes through a Sustainability Appraisal and HRA. Again, the Main Modifications, SA and HRA underwent a formal representation stage from May 2016.

Changes made as a result of the appraisal

The appraisal at this stage did not lead to any changes. The modifications were generally as a result of detailed discussion at the Local Plan examination. Changes at this stage reflected new evidence, updated planning guidance and agreed approaches between parties to ensure an improved policy approach.

<u>Changes made as a result of consultation</u>

There was limited comments made at this stage and no further changes were required as a result of the consultation to the modifications or the appraisal.

5. Reasons for choosing the plan as adopted, in light of other reasonable alternatives considered

In 2011 three options were considered and consulted on for the Sefton Local Plan [then known as the Core Strategy], based upon the level of development [housing and employment] proposed. Since then further work was undertaken to look at the housing requirement for Sefton. The three options that were developed at that time were as follows:

Option One – Urban Containment. A minimum of 270 new homes per year all provided on sites in the urban area. Employment growth would be limited to existing employment sites in the urban area.

Option Two – Meeting Needs. A minimum of 510 new homes per year based on the identified needs of Sefton's residents and new employment sites in north and south of the Borough. This would require land from the Green Belt to be released for new homes and employment.

Option Three – Optimistic Growth. A minimum of 700 new homes proposed per year to meet the needs of Sefton's residents and additional to provide more growth and new employment land in the north and south of the Borough. This would require land from the Green Belt

An assessment of these three options was undertaken as part of the SA process and the findings were presented in an interim SA Report in July 2013.

The Council's preferred option was Option 2 'Meeting Needs'; meaning that the Local Plan would plan for 510 homes per year and for three new employment areas. This would require land in the Green Belt being released for development in the plan period.

The SA findings supported the preferred approach, highlighting that;

- There would be a positive effect on housing by planning to deliver market and affordable housing needs.
- New locations for development would help to reduce unemployment in areas of need.
- Planning for housing need would help to halt the continued decline of Sefton's population and help to support the viability of local services and facilities.
- The critical mass of development would help to support improvements in infrastructure and regeneration schemes.

- Although there would be some adverse effects on landscape, ecology and agricultural land, the effects would be more manageable compared to option 3 (which released more Green Belt land)
- Areas at highest risk of flooding could be avoided.

As the Local Plan progressed, more studies were carried out in a range of areas, including a review of the housing requirement, and an updated Strategic Housing Market Assessment.

A range of scenarios were tested as part of the housing requirement modelling, which identified an objectively assessed housing need range of 600-800 dwellings per year. At the higher end of this range, the scenarios were employment led, assuming a high level of net immigration and therefore Sefton would also be meeting housing needs from outside the Housing Market Area.

1	Urban Containment
-	• 6,309 dwellings
	58.4 hectares of employment land
	 Development would be refined to the existing settlement boundaries.
2 a	Household projections dispersed across Sefton
2 u	• 9,171 dwellings – 420dpa
	• 76 hectares of employment land
2b	Household projections with a South Sefton focus
	• 9,171 dwellings – 420dpa
	• 76 hectares of employment land
2c	Household projections with a North Sefton focus
	• 9,171 dwellings – 420dpa
	• 76 hectares of employment land
3a	Objectively Assessed Need dispersed across Sefton
Ju	• 11,624 dwellings – 615dpa
	76 hectares of employment land
3b	Objectively Assessed Need focus in South Sefton
	• 11,624 dwellings – 615dpa
	76 hectares of employment land
4	Objectively Assessed Needs higher forecast
	• 15,120 dwellings – 800dpa
	76 hectares of employment land
	 Not possible to focus growth in any one area as a higher number sites
	would be required.
	(i.e. would require comprehensive development throughout Sefton).
5	Growth based upon Experian job forecast
	Higher end of the OAHN.
	• 21,206 dwellings – 1,122dpa
	 6086 dwellings would need to be met outside of Sefton.
	 76 hectares of employment land + 25hectares outside of Sefton.
	1 ,

 Not possible to focus growth in any one area as a higher number sites would be required.

Additional Site for Port Logistics

Peel Holdings proposed a large site [48ha, for approx. 1 million sq ft net floor space] between Maghull and Aintree/Melling for logistics operations to support growth arising from investment in the port of Liverpool and wider super port initiative. This land is not proposed for employment uses as considered in the Employment Land and Premises and as such the site is not proposed to meet any of this need.

It was possible to include the proposal for a Port Logistics site as a separate element of each the options above [except for option one which seeks urban containment, i.e. no Green Belt loss].

Therefore, this was been tested as a 'policy off' and 'policy on' for options 2 to 5 above.

Why has the preferred approach been selected?

The preferred approach

The Council's preferred approach to housing growth and distribution is broadly reflective of option 3a, without the inclusion of the additional site for port logistics.

The Preferred Option was supported for a number of key reasons:

- It meets the Government's requirement to meeting needs, providing choice of homes and other economic development
- It will provide more opportunities for families and young people to meet their housing needs and access jobs
- It will enable significantly more affordable homes to be provided than at present
- At a time of severe cutbacks in public sector funding, the allocation of land for new homes may help to keep some existing local services viable because more people will live in a particular area
- It will also bring significant investment in new infrastructure which will be paid for through the development process
- This Option has the unanimous support of our adjoining local authorities. We have a legal 'duty to co-operate' on strategic planning matters so it is important that we work closely with and take note of the views of our neighbouring authorities
- This Option best matches past rates of development in the Borough we have built an average of 470 dwellings in Sefton for the past 30 years
- It will identify the most sustainable green belt sites for development with fewest constraints – having regard to local constraints such as flood risk and ecological designations
- It will ensure that best use is made of Sefton's assets including for land in the urban area and the Green Belt
- It will enable, as far as possible, a spread of development across the Borough meeting needs, in the main, where they arise

- It will deliver a new urban extension, providing significant investment in local infrastructure, meeting needs in a sustainable mixed use development
- It will provide significant new local employment opportunities to help support the economy
- It will protect the heritage and environments of Sefton with detailed polices requiring high design standards in new development
- It is considered to be a deliverable option.

Summary of the SA findings

The preferred approach is reflective of the SA findings in that the preferred scale and distribution of growth is identified in the SA as being the 'most sustainable' strategy compared to the alternatives.

When comparing the two alternative approaches to distributing the preferred scale of growth (*i.e. alternatives 3a and 3b*) there are only slight differences in how they perform against the SA framework.

However, the SA suggests that (on balance) alternative 3a was the most sustainable approach as it would have a lesser effect on landscape character. This approach would also better help to meet affordable housing needs in areas where the issues are greater (such as Southport) and would avoid placing significant pressure on transport infrastructure in the South of the Borough, which is already constrained.

Whilst the inclusion of the proposed site for port logistics could have a significant positive effect on the local economy and regeneration objectives, there are significant environmental constraints that would be difficult to mitigate. Development would also exacerbate accessibility issues, and would be likely to promote significant in-commuting.

Site selection

Given the need to release Green Belt land for development (in addition to sites within the urban area), one of the starting points for identifying reasonable site options was to undertake a Green Belt Study.

A study was published in May 2011 which considered the whole of the Green Belt area as potentially being available for future development. However, the study concluded that significant areas should remain within the Green Belt for a number of critical reasons, namely that:

- The importance of the site in meeting the five purposes of the Green Belt.
- Whether the site contained critical constraints such as land with a high risk of flooding (flood zone 3) or designated nature conservation areas.

Following this initial sieving of unsuitable sites, the Green Belt study identified 46 Green Belt sites considered to have some potential for development. These sites were consulted on during May to August 2011.

These sites were first appraised through the SA process in 2013, and the findings of the site assessments at that time were presented in a SA Report (July 2013).

The Council subsequently developed a detailed Site Selection Methodology that incorporated the requirements of sustainability appraisal. This methodology built upon the approach taken at preferred options stage.

The detailed methodology can be found in the Local Plan Site Selection Methodology Report (see https://www.sefton.gov.uk/planning-building-control/planning-policy-including-local-plan-and-modifications-and-neighbourhood-planning/local-plan-examination-library.aspx) [Document LP.5]

The results of the process was the identification of sites that the Council considered provided the most sustainable choice of sites for it to meets preferred strategy.

6. Measures that are to be taken to monitor the Significant Environmental Impacts of the Implementation of the Plan

Article 10 of the European Directive sets out the requirement to monitor Significant Environmental Impacts (SEI) and to take any necessary remedial action. It acknowledges that existing monitoring arrangements can be used where appropriate to avoid the duplication of monitoring.

Appendix 3 of the Local Plan provides the Objectives and indicators that comprise the monitoring framework. The purpose of the monitoring framework is to ascertain whether the strategy and policies of the Local Plan are delivering their intended outcomes, and where they are not, recommend remedial action. The indicators will monitor a variety of environmental, social and economic effects of the Local Plan, encompassing the achievement of sustainability.

Due to the close relationships between the indicators of the Local Plan, and other more widely collected Council indicators, a number of the indicators are shared which has the advantage of removing the need to collect additional data and of providing a consistent data source.

Higher levels of development in the Borough will inevitably result in negative effects in some sustainability objectives. However, through the SA and HRA process, the Council believe they have mitigated significant negative effects through the overall requirements of the Local Plan or have identified measures that can be put in place alongside development to mitigate for significant negative effects. The indicators prepared by the Council will facilitate the monitoring of sustainability and highlight where any remedial action is required to address any emerging weaknesses in the Plan.

All indicators, both for the Local Plan and SEI's, will be monitored and reported through the Authority Monitoring Report (AMR). The AMR is a key component of the implementation of the Local Plan and measures the success of policies against a series of national and local indicators. It aims to show whether policies are achieving their objective and whether sustainable development is being delivered, whether policies have had their intended consequences, whether the assumptions being policies are still relevant, and whether the targets of the Local Plan are being achieved.

Monitoring guidance recognises the need to update indicators where necessary to reflect changes in policy and monitoring requirements. National and local targets may also be reviewed. Subsequently, the indicators adopted through the Local Plan may be liable to amendment in the future.