

Sustainability Appraisal

Post Adoption Statement

January 2020



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1. Introduction

- 1.1 This statement outlines and describes the approach taken by Sunderland City Council (the Council) regarding environmental and sustainability considerations and the views of consultees, when preparing the Core Strategy and Development Plan (the Plan). This statement is the final output of the Sustainability Appraisal (SA) and its incorporated Strategic Environmental Assessment (SEA) process.
- 1.2 Regulation 16 (4) of the SEA Regulations, identifies that a statement must be produced summarising;
- How environmental considerations have been integrated in to the plan or programme;
 - How the environmental report has been taken into account;
 - How opinions expressed in response to:
 - The invitation referred to in regulation 13(2)(d);
 - Action taken by the responsible authority in accordance with regulation 13(4)
 - How the results of any consultations entered into under regulation 14(4) have been taken into account;
 - The reasons for choosing the plan or programme as adopted, in length of the other reasonable alternatives dealt with; and
 - The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.
- 1.3 This statement addresses and satisfies all points identified in Regulation 16 (4) of the SEA Regulations and demonstrates compliance with SEA legislation.

2. Sustainability Appraisal and Strategic Environmental Assessment

- 2.1. The National Planning Policy Framework (NPPF) is clear that the planning system’s purpose is to achieve sustainable development through the delivery of three cornerstones of planning; economic, social and environmental opportunities. The SA process ensures that these three cornerstones are continually assessed through the plan making process to ensure that sustainable development is central to the development of plans.
- 2.2. The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the legal requirement for Local Plans to be subjected to SA. Guidance stipulates that the SA must comply with the requirements of the SEA Regulations which transpose the SEA Directive into UK law.
- 2.3. The SEA Directive is clear¹ that the aim of SEA is to provide a “high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”. Therefore, the SEA process ensures that environmental consequences have

¹ Article 1

been properly, and fully assessed and environmental issues are integrated and assessed at the earliest opportunity in the plan making process.²

2.4. The SEA and SA processes can be undertaken together as a combined process, one which is advocated in National Planning Practice Guidance³, which recommends SA and SEA be undertaken as a combined process to assess social, economic and environmental effects, in accordance with the following legislative requirements:

- Planning and Compulsory Purchase Act 2004;
- Town and Country Planning (Local Planning) (England) Regulation 2012;
- EU Directive 201/42/EC (SEA Directive);
- The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations); and
- National Planning Policy Framework 2012⁴ (Paragraph 165).

2.5. For the purpose of this statement, the integrated appraisal approach will be hereafter referred to as the Sustainability Appraisal (SA).

3. Core Strategy and Development Plan (2015-2033)

3.1. The Core Strategy and Development Plan (CSDP), hereafter referred to as the Plan, sets out the overarching strategy, strategic policies and strategic allocations and designations for the future change and growth of Sunderland. The Plan also includes local policies for development management purposes. The Plan covers the development period from 2015 to 2033 and applies to all land within Sunderland's administrative boundary.

3.2. The preparation of the Plan has largely taken place over the last four years, with some work preceding this period. Throughout the process the Council has cooperated with neighbouring authorities and statutory stakeholders regarding cross boundary issues and strategic matters, in accordance with the legal obligations of the Duty to Cooperate.

3.3. The development of the Plan was an iterative process with various stages of consultation. All comments to the Plan were considered at each stage of consultation. The stages of development of the Plan are identified below.

3.4. **Stages 1-3:** The first formal stage of preparing the Plan began with the identification of initial Issues and Options for the City. Public consultation on these took place in late 2005 and this was used to inform and prepare the subsequent Core Strategy Preferred Options draft.

3.5. **Stages 4 and 5:** Due to changes in legislation on plan-making and emerging local circumstances (the adoption of the RSS, new evidence on housing and employment needs), and to ensure that

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³ National Planning Practice Guidance: Strategic Environmental Assessment and Sustainability Appraisal

⁴ The Core Strategy was submitted during the transitional arrangements set out within Paragraph 214 of the NPPF 2019, therefore it was prepared and assessed against the 2012 Framework.

the Core Strategy was founded on strong and sustainable development principles, it was deemed necessary to give further consideration to how the city might develop spatially. In particular, consideration needed to be given to the different ways that housing and employment might feature in Sunderland and the implications of these for future development patterns.

- 3.6. The Alternative Approaches document (September 2009) set out four different strategic options for the growth of the City over the next 20+ years. The approaches were based upon previous Core Strategy consultation feedback, the policies of the adopted UDP A Iteration for Central Sunderland, the city's Economic Masterplan and the principles of the (now revoked) Regional Spatial Strategy (RSS).
- 3.7. Following consultation on the Alternative Approaches document, in August 2013 the Council published its Draft Core Strategy and Development Management Policies plan for consultation. This set out the levels of growth being planned for within the city, which were based on the Alternative Approaches consultation and also included a number of detailed Development Management policies.
- 3.8. **Stages 6 to 8:** Although work on the Plan commenced as early as 2005, the Council decided to rebase the Plan with a start date of 2015, to take account of the passage of time, updated evidence and changes to Government guidance. A Local Plan SA & SEA Scoping Report was collated in 2015 to inform this process.
- 3.9. As required by the relevant regulatory requirements, Local Plan SA & SEA Scoping Report set out the methodology which underpins the SA of the Core Strategy and Development Plan. The main output was the production of a SA Framework, which comprised of a suite of 15 Sustainability Appraisal Objectives (SA Objectives) relevant to the Sunderland area which may affect (or be affected by) the Plan. These SA Objectives were accompanied by a set of guide questions to inform the assessment of the Plan components and any identified reasonable alternatives. This SA Framework was subsequently tweaked in response to feedback from consultees, but it was not deemed necessary to make any substantive changes that would affect the SA methodology or conclusions.
- 3.10. Following the Scoping Report, a SA and SEA was undertaken on the Growth Options consultation document which outlined conceptual growth options (Baseline, Medium Growth and High Growth) and associated spatial strategy variants which could underpin the emerging Sunderland CSDP. The associated SA Report examined the relative sustainability implications of these growth options and spatial strategies. Following a consultation, the High Growth option was selected by the Council to underpin the emerging Plan, although significant changes in the evidence base meant that a lower quantum of development would be required within the area to implement this option.
- 3.11. In May 2016, the Council published its Growth Options for consultation, which set out three alternative growth scenarios for the city over the revised plan period based on new evidence.

- 3.12. Following consultation on the Growth Options, the Council published its Draft Core Strategy and Development Plan for consultation in August 2017. This set out the proposed spatial strategy for the city, including a number of strategic site allocations. The draft plan also included detailed Development Management policies. The Draft Plan was supported by a draft SA (including SEA) report in 2017 which took into consideration the outcomes of the Growth Options consultation and the SA.
- 3.13. The Draft SA Report (2017) identified, assessed and evaluated the likely significant effects of all substantive components of the Draft Plan. No significant adverse effects were predicted to arise, but the SA Report still identified a number of weaknesses within the emerging plan and therefore proposed a suite of mitigation and enhancement recommendations to address identified uncertainties and improve its sustainability performance. These recommendations were considered by the Council through the subsequent preparation of the Publication Draft Sunderland CSDP and improvements incorporated where possible.
- 3.14. The Council published its Publication Draft Core Strategy and Development, along with a revised SA report in June 2018 for a last round of consultation prior to submission.
- 3.15. Following Council approval in November 2018, the Publication Draft Core and Development Plan (including minor modifications) was submitted to the Secretary of State for Examination on 21 December 2018. Following the examination hearings which were held in May 2019 and June 2019, the Inspector recommended a number of Main Modification to the Publication Draft Plan that he considered necessary to make it sound.
- 3.16. In light of the Main Modifications, a SA Addendum that considered the Main Modifications was produced. The Council undertook consultation on the Main Modifications and accompanying SA Addendum between 13 September 2019 – 25 October 2019.
- 3.17. Following consideration of the consultation comments to the Main Modifications consultation, the Inspector issued his report dated 7 January 2020 that found the CSDP to meet the requirements and criteria for soundness set out in the NPPF. The CSDP was then subsequently adopted by the Council on 30 January 2020.

4. How environmental considerations have been integrated into the plan or programme?

- 4.1. This section addresses how the environmental and sustainability considerations have been integrated into the Plan and SA process.

Environmental and Sustainability Consideration in the Plan

- 4.2. The Plan is based upon the key principle of sustainable development and its three dimensions of social, economic and environmental sustainability, as set out in the NPPF 2012.

An economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

A social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

An environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

- 4.3. The three key dimensions of sustainable development have been integral to the key decisions and direction of the Plan and its evolution. The dimensions of sustainable development are interdependent and have been pursued in mutually supportive ways so that opportunities to secure net gains are possible, for all policies and objectives within the Plan. This has been achieved through the preparation of a comprehensive and robust evidence base with supporting technical assessments.
- 4.4. In regard to environmental considerations within the Plan, the Council prepared or commissioned a suite of exacting evidence documents and technical assessments, including; Strategic Flood Risk Assessments - Levels 1 & 2, Transport Assessments – Initial Assessment and Addendums 1 & 2, Green Belt Review and Assessments, Green Infrastructure Report and ecological appraisals. A Habitats Regulation Assessment (HRA)⁵ was also undertaken and integrated into the SA process alongside continued and sustained engagement with statutory stakeholders, consultees and the public at each stage of the Plan's evolution, alongside the Plan's full evidence base (including the SA) . All engagement and consultation was undertaken in line with the Council's Statement of Community Involvement and met the Council's Duty to Cooperate requirement.

Environmental and Sustainability Considerations in the Sustainability Appraisal

- 4.5. The SA process considers the environmental and sustainability issues arising from the Plan. This is undertaken through an appraisal framework which underpins the assessment methodology and comprises a series of SA Objectives and guide questions (covering social, economic and

⁵ The process by which the effects of a plan or programme on European sites are assessed is known as 'Habitat Regulations Assessment'. Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the 'Habitat Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites to determine whether there will be any 'likely significant effects' on any European site as a result of implementing the plan either alone or 'in combination' with other plans or projects; and if so, whether these effects will result in any adverse effects on that site's integrity with reference to the site's conservation objectives.

environmental issues) that help to measure the performance of the various components of the CSDP.

4.6. The SA objectives and guide questions were developed using the review of previous versions of the Plan, programmes and environmental objectives, the baseline data, the key issues and opportunities, and the outcomes of consultation on the SA Scoping Report. The SA Objectives and guide questions are set out in chapter 5 within the SA Report 2018, to measure the performance of the following:

- Vision and Strategic Priorities;
- Proposed strategic site allocations;
 - Urban Strategic Scale Sites
 - Housing Growth Areas
 - Key and Primary Employment Areas
 - Travelling Showpeople, Gypsies and Travellers (TSGT) Sites
- Proposed policies of the plan (including proposed strategic and subject policies).

4.7. As part of the appraisal process, the SA recommended mitigation measures in order to mitigate potential adverse (negative) effects and to further increase any potential positive beneficial effects. The recommended mitigation measures were considered by the Council in developing and refining the Plan and incorporated as appropriate into the Publication Draft Plan (see Table 4.2 of the SA report 2018). The assessment of strategic site allocations and their reasonable alternatives were also important considerations in determining the Council's final site allocations. Associated changes made to specific policies or allocations within the Plan in response to SA findings are identified in the Council's Compliance Statement, in full.

4.8. The SA Addendum provided a proportionate SA screening to the Main Modifications and found that all modifications would be acceptable in environmental and sustainability terms, including in relation to consequential effects on the housing, employment and Green Belt strategies which underpin the Plan. Therefore, no additional mitigation measures for further SA consultation were deemed necessary.

5. How has the environmental report been taken into account?

5.1. The development of the Plan has been an iterative process. Consultants were commissioned to undertake and prepare a SA at each stage of the Plan's development. The Council's Planning Strategy team took onboard all findings and recommendations of the SA process and incorporated them into each stage of the Plan. A supporting SA report was published at each preparation stage of the Plan and was made available for consultation as set out in section 3 of this report.

5.2. The SA Report (2018) submitted to the Secretary of State and the SA Addendum (2019) that considered the Main Modifications, were reviewed by the Inspector as part of the CSDP Examination process. The Inspector's Final Report amended some of the Main Modifications, with alterations to detailed wording or making consequential modifications to address

consistency or provide clarity. The Inspector considered that these amendments did not undermine the participatory processes and SA that had been undertaken.

6. How have opinions expressed in response to the consultation on the SA reports been taken into account?

6.1. The Plan has been developed following consideration of consultation comments received as part of formal statutory consultation on the Plan and SA Report, in accordance with the SEA Regulations. The following SA Reports were prepared and published for consultation at each of the Plan's key development stages:

- SA Scoping Report (2015)
- SA Report including SEA (2017)
- Draft Publication CSDP SA Report including SEA (2018) – Submitted with Draft Publication CSDP
- SA Addendum (2019) – Post Submission SA undertaken on Main Modifications

Sustainability Appraisal Scoping Report 2015

6.2. To identify the scope of the Sustainability Appraisal (SA) for the Plan, a draft SA Scoping Report was prepared which included a review of other plans and programmes, established the existing baseline position, and set out the proposed SA Framework against which the Core Strategy Vision, Objectives and Policies would be assessed. Following consultation on an initial draft SA Scoping Report for the LDF Core Strategy during May-July 2009, a revised SA Scoping Report for the Plan was published for consultation for a 5-week period between 23 October and 27 November 2015.

6.3. In addition to publishing a statutory notice in the local press and making the draft SA Scoping Report available on the Council's website, the three statutory SA consultation bodies (Natural England, Historic England and the Environment Agency) were directly consulted by letter, together with a number of other key stakeholders:

- adjacent local authorities
- Town and Parish Councils within and bounding the Sunderland City Council area
- Coal Authority
- Highways England
- Homes and Communities Agency (HCA)
- Marine Management Organisation (MMO)
- Network Rail
- NHS Clinical Commissioning Groups (CCG)
- Northumbria Police
- North East Local Enterprise Partnership (NELEP)
- Telecommunications operators
- Utilities companies

6.4. Consultation responses to the revised SA Scoping Report were received from Natural England, the Environment Agency and Highways England. These led to amendments to the Report's

Appendix 2 (Plans, Policies and Programmes) and Appendix 3 (Baseline), with the SA Scoping Report subsequently finalised in March 2016.

Sustainability Appraisal including Strategic Environmental Assessment Report (2017)

- 6.5. The first iteration of the SA and SEA informing the Draft Plan, was prepared in 2017. The report included a review of other plans and programmes, analysed the existing baseline position, provided a predicted evolution of the baseline in the absence of the Plan and examined the sustainability implications against the Plan's Vision, Objectives and Policies.
- 6.6. The outcomes of the report identified no significant adverse effects were predicted to arise, but the SA Report identified a number of weaknesses within the emerging plan and proposed a suite of mitigation and enhancement recommendations to address identified uncertainties and improve the Plan's sustainability performance. These recommendations were considered by the Council through the subsequent preparation of the Publication Draft Sunderland CSDP and necessary amendments to the Plan were made (see Table 4.2 the SA report 2018).
- 6.7. The SA and SEA report was consulted upon alongside the Draft Core Strategy for an 8 week period between 7 August and 2 October 2017. Of the representations received by the Council to the SA and SEA report, there were no substantive matters of concern or queries that required specific attention. The only minor change made between the SA and SEA reports for the Draft and Publication Draft CSDPs was in response to the representations to improve clarity. Consequently, the final Guide Question in relation to SA Objective 1 – Biodiversity & Geodiversity within the SA was amended to refer to "access to nature" instead of "access to wildlife".

Sustainability Appraisal including Strategic Environmental Assessment Report (2018)

- 6.8. The second iteration of the SA and SEA report was prepared in 2018 and informed the Publication Draft Plan. The 2018 report proposed further modifications to the Plan which would enhance its effectiveness and provide clarity. These amendments were made to the Publication Draft Plan prior to it being published for consultation and are detailed in chapter 5 and 6 of the SA and SEA report 2018.
- 6.9. The SA and SEA report was consulted upon alongside the Publication Draft Plan for a 6 week period between 15 June 2018 and 27 July 2018. After the consultation period concluded, the Publication Draft Plan, its associated SA and SEA Report and all consultation responses were submitted to the Secretary of State for Public Examination by an Independent Planning Inspector, on the 18 December 2018.

Sustainability Appraisal Addendum Report (2019)

- 6.10. Further to the Public Examination of the CSDP in May and June 2019, the Inspector recommended a series of Main Modifications to the Plan, to make it sound. Consequently, a SA Addendum report was undertaken. The SA Addendum report provided a proportionate SA screening of the suite of recommended Main Modifications to the Publication Draft Plan in

order to confirm that these would not result in any new or different likely significant effects in the context of the SEA Regulations or core SA requirements outlined in the 2004 Act. In the absence of any new or different likely significant effects being identified, the report concluded that:

- The incorporation of all Main Modifications into the Plan would be acceptable in environmental and wider sustainability terms, including in relation to consequential effects on the housing, employment and Green Belt strategies which underpin the Plan;
- The conclusions of the Publication Draft Plan's SA Report (2018) remain valid; and therefore,
- No development of additional mitigation measures or further SA consultation is necessary prior to the Plan's adoption.

6.11. The SA Addendum report underwent a 6 week consultation between 13 September 2019 and 25 October 2019. Responses received as part of the consultation were considered by the Inspector in preparing his Final Report.

6.12. The comments received throughout the consultations outlined above, have informed the scope of the SA, helping to shape the development of the CSDP from inception to adoption.

7. The reasons for choosing the plan or programme, as adopted, in light of the other reasonable alternatives dealt with?

7.1. The SEA Regulation 12 (2) require the likely significant effects of implementing both a plan or programme (i.e. the emerging CSDP) and reasonable alternatives to it to be examined, as well as the rationale for identifying reasonable alternatives to be described. The SEA Regulations further state that to be considered as reasonable alternatives, options (e.g. alternative policy criteria or site allocations) must relate to the plan or programmes' corresponding objectives and geographical scope. To be eligible for consideration in this SA process, reasonable alternatives must therefore be:

- **Realistic**, in that they are plausible alternatives which could be implemented instead of proposals within the emerging Plan and are consistent with relevant national and other policy frameworks;
- **Related** to the objectives of the emerging Plan; and,
- Within the **geographical scope** of the emerging Plan, i.e. any reasonable alternatives would need to relate to the distribution or characteristics of future development within the Sunderland area.

7.2. For the SA of the Publication Draft Plan, the following reasonable alternatives were identified where possible and subjected to SA in the same way as proposed plan components:

- Alternative policy criteria/tests considered by the Council during the preparation of the Publication Draft Plan, e.g. application of a higher or lower affordable housing provision requirement. Where reasonable alternatives to draft policies were identified, was reflected within relevant SA matrices within the reports;

- Alternative Urban Strategic Scale Sites – the justifications for allocating the South Sunderland Growth Area (SSGA) and Vaux Site were examined to determine whether any reasonable alternatives exist;
- Alternative Housing Growth Areas – all candidate Housing Growth Areas which reached Stage 2 of the Council’s Green Belt Review were assessed;
- Alternative Key and Primary Employment Areas – all sites examined within the Sunderland Employment Land Review 2016 as forming part of the existing employment land supply were assessed; and,
- Alternative Gypsy, Traveller and Travelling Showpeople Sites (TSGT) – all sites which were identified by the Council as being potentially suitable and not discounted due to viability constraints were assessed.

7.3. Given that reasonable alternatives must relate to the objectives of the plan under consideration, no reasonable alternatives to the vision or strategic objectives contained within the Publication Draft Plan could be identified, as any alternatives would change the strategic direction of the Plan. Having regard to the status, objectives and justification for the South Sunderland Strategic Growth Area (SSGA) and The Vaux proposed allocations, no reasonable alternatives to these strategic scale urban allocations could also be identified.

7.4. The Plan and SA process has been developed through an iterative process, with the Council evaluating and integrating the findings of the various stages of the SA into strategy, policy and allocations development. Comments made through the consultation have also been taken into consideration at each stage of its preparation.

7.5. The findings of the SA were not the only considerations taken into account when determining the content of the Plan and a key aspect in developing the Plan was achieving a balance between the aims of meeting housing needs and facilitating economic growth against the need to protect and enhance Sunderland’s natural, historic and built environment. As a result of this, the SA framework identifies both potential positive and negative effects for the various proposals and their reasonable alternatives, such that it is not possible to rank the options solely on their score alone in order to select the final option. Therefore, a balance must be sought.

7.6. The SA has recommended mitigation measures to overcome negative effects and to enhance positive effects. The Council has considered the recommended mitigation measures in developing the Plan. The Plan also includes a range of Development Management policies that aim to protect and promote sustainable development (social, economic and environmental) in the city and contribute towards mitigating potential negative effects.

8. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme?

- 8.1. The SEA Regulations require the council to monitor the significant environmental effects of the implementation of the Plan with the purpose of identifying unforeseen adverse effects at an early stage to allow appropriate remedial action to be undertaken.
- 8.2. The monitoring framework has been developed to measure the performance of the Plan against changes in defined indicators that are linked to its implementation. These indicators have been developed based on the following:
 - The objectives, targets and indicators that were developed for the SA Framework;
 - Features of the baseline that will indicate the effects of the plan;
 - The likely significant effects that were identified during the assessment; and
 - The mitigation measures that were proposed to offset or reduce significant adverse effects.
- 8.3. The monitoring framework has been designed to focus mainly on significant sustainability effects including those:
 - That indicate a likely breach of international, national or local legislation, recognised guidelines or standard;
 - That may give rise to irreversible damage, with a view to identifying trends before such damage is caused;
 - Where there was uncertainty in the SA, and where monitoring would enable preventative or mitigation measures to be taken.
- 8.4. As well as measuring specific indicators linked to the implementation of the Plan, contextual monitoring of social, environmental and economic change has been included i.e. a regular review of baseline conditions in the city. This enables the measurement of the overall effects of the Plan
- 8.5. There are numerous SA indicators available and it is not always possible to identify how a specific plan has impacted a receptor, for example housing provision is likely to be influenced by a number of actions and different plans. A thorough analysis of the data collated and the emerging trends will, therefore be important.
- 8.6. A fundamental aspect of developing the SA monitoring strategy is to link with existing monitoring programmes and to prevent duplication of other monitoring work that is already being undertaken. Consideration has, therefore been given to the Implementation and Monitoring Framework that will be used to monitor delivery of the plan policies.
- 8.7. Recommendations for monitoring the social, environmental and economic effects of implementing the Plan are presented in full the SA and SEA Report (2018). The impacts predicted in the SA will not be realised until development occurs. The monitoring framework

presented in the full SA Report can then be updated to include targets as and when they are developed.

- 8.8. Local Planning Authorities are also required to produce an annual Authority Monitoring Report (AMR) which is the main mechanism for assessing the performance and effects of a Local Plan. The recommended SA monitoring framework will be incorporated into and monitored alongside the Implementation and Monitoring Framework and reported in the annual AMR. The AMR will be available to view on the Council's website.
- 8.9. In accordance with Section 13 of the 2004 Act, on adoption of the Plan the Council must keep the plan under review. Related to this, the SEA Regulations require the Council to monitor the significant environmental effects of the implementation of the Plan with the purpose of identifying unforeseen adverse effects at an early stage to allow appropriate remedial action to be undertaken.
- 8.10. To comply with the above statutory requirements, the Council has developed a full Implementation and Monitoring Framework for the Plan. This will be used as the main tool to monitor and review the implementation of the plan and the associated environmental effects. It will also identify and monitor the actions required by multiple stakeholders to deliver key elements of the plan, including but not limited to the delivery of development on strategic site allocations.
- 8.11. For a successful monitoring framework, the Council have ensured that the indicators they choose for monitoring are specific, manageable and targeted towards measuring the implementation of the Plan. The Implementation and Monitoring Framework is based around the 15 SA Objectives and the associated indicators and targets detailed within the Plan's SA Framework.
- 8.12. The Implementation and Monitoring Framework includes mechanisms to monitor the likely significant effects on the environment of the Plan as predicted within the SA Report. This includes mechanisms to monitor whether the likely significant adverse effects identified from the proposed allocation of strategic sites are subsequently properly addressed through:
- The application of relevant subject policies in the Council's decision making;
 - The provision of relevant technical assessments in support of development proposals on allocated sites; and,
 - Where necessary, the implementation of appropriate physical mitigation by applicants seeking to develop these sites.
- 8.13. In addition, the Implementation and Monitoring Framework includes mechanisms to assess whether all development management policies are being implemented as intended and with no unforeseen adverse consequences.
- 8.14. To inform future reviews of the statutory Development Plan for the area, the Council will monitor whether the policies remain in conformity with any updates to national planning policy.

