Planning for the Future
Core Strategy and Urban Core Plan for Gateshead and Newcastle upon Tyne
Sustainability Appraisal Adoption Statement
March 2015
1 Introduction

1.1 Gateshead and Newcastle Councils have prepared a shared planning strategy, in recognition of the economic advantage that collaboration has for both areas. The Core Strategy and Urban Core Plan for Gateshead and Newcastle upon Tyne (the Plan) contains the Councils’ overall joint spatial vision, objectives and strategic policies, alongside specific policies to strengthen the role of the Gateshead and Newcastle Urban Core. The purpose of the Plan is to set out a clear framework for growth in Gateshead and Newcastle from 2010 to 2030. The strategy sets the quantity and location of new housing, employment provision, shops, facilities and other services together with transport and other infrastructure provision.

1.2 Under the Planning and Compulsory Purchase Act (2004), Sustainability Appraisal (SA) is a mandatory requirement in the preparation of Local Plan documents. The purpose of the SA is to assist in ensuring plans contribute to achieving sustainable development. SA is a structured approach to predicting and assessing the economic, social and environmental effects that are likely to arise from a plan, programme or strategy. Government favours combining SA with Strategic Environmental Assessment (SEA) – required under the Environmental Assessment of Plans and Programmes Regulations 2004. This single combined appraisal (referred to as SA) is the approach adopted by Gateshead and Newcastle Councils in preparing the Plan.

1.3 Regulation 16(4) of the SEA Regulations sets out requirements for an adoption statement which identifies:
   i. How environmental considerations have been integrated into the plan;
   ii. How SA/SEA has been taken into account;
   iii. How the opinions in response to the relevant consultations on the SA report(s) have been taken into account;
   iv. The reason for choosing the plan as adopted in light of other reasonable alternatives; and
   v. The measures agreed to monitor the significant effects of the implementation of the plan.

1.4 This SA adoption statement meets the above requirements. It provides details of the SA process carried out to support and inform preparation of the Plan, including how the SA has directly influenced objectives and policies.

2 The Sustainability Appraisal Process

2.1 Full details of the methodology used in the SA of the Plan are provided in the SA reports published alongside drafts of the Plan.

2.2 As noted at paragraph 1.2, in accordance with good practice, the Councils combined SA and SEA into a single combined appraisal. Similarly, the Councils decided, in accordance with Government guidance, to integrate the Health Impact Assessment and Equalities Impact and Needs Assessment into the SA, rather than carrying out separate studies. The results of the Councils’ Strategic Flood Risk Assessment and Surface Water Management Plans have also fed into the SA. A Habitats Regulations

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1 All relevant documents are available from the Councils’ websites: www.gateshead.gov.uk, or www.newcastle.gov.uk
Assessment (Stage 1: Screening Report) was carried out in parallel with the SA process, and published alongside submission of the Plan.

2.3 The SA followed a structured and iterative process. Each iteration of the SA (the reports produced to support and inform each draft of the Plan) revisited the stages of the process and updated elements where necessary.

Scoping

2.4 A review of relevant plans, programmes and strategies, and the collection of baseline data helped identify key sustainability issues to be addressed by the Plan. A steering group comprising Council officers with responsibility for a range of functions provided input into the Scoping Reports. These reports proposed the framework against which the Plan would be assessed, and set out the Sustainability Objectives that would be contained within this framework.

Appraisal and Reporting

2.5 SA reports were produced to assess the Plan at each stage of its preparation. The SA has been based on the appraisal framework, and uses the Sustainability Objectives that were identified at the scoping stage. The SA assesses the effects of the Plan, identifies any residual effects and sets out any mitigation of predicted significant negative effects. The SA emphasises the importance of robust monitoring for the successful implementation of the Plan, and the Sustainability Objectives. Consequently the SA makes recommendations for the monitoring framework that accompanies the Plan.

2.6 An SA report was produced at each stage of Plan preparation. Following the publication of the National Planning Policy Framework, and revised regulations in 2012, the Councils decided to prepare a combined Core Strategy and Urban Core Plan. Prior to this, the Councils had been preparing two separate documents concurrently: the One Core Strategy, and the Urban Core Area Action Plan, each of which was subject to SA separately.

Table 1

<table>
<thead>
<tr>
<th>The stages of Sustainability Appraisal of the Plan</th>
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| **NewcastleGateshead One Core Strategy**  
Consultation Draft  
Sustainability Appraisal Report, February 2011 | **NewcastleGateshead Urban Core Area Action Plan**  
Preferred Options Report  
Sustainability Appraisal Report, February 2011 |
| **NewcastleGateshead One Core Strategy**  
Draft Plan  
Sustainability Appraisal Report, September 2011 | **NewcastleGateshead Urban Core Area Action Plan**  
Draft Plan  
Sustainability Appraisal Report, September 2011 |
| **Proposed Major Changes**  
‘Light-Touch’ Sustainability Review, July 2012 |  |
| **Core Strategy and Urban Core Plan for Gateshead and Newcastle**  
Proposed Submission Document  
Sustainability Appraisal Report, August 2013 |  |
| **Core Strategy and Urban Core Plan for Gateshead and Newcastle**  
Submission Document  
Sustainability Appraisal Report, December 2013 |  |
| **Core Strategy and Urban Core Plan for Gateshead and Newcastle**  
Submission Document (Proposed Main Modifications)  
Sustainability Appraisal Report Addendum, November 2014 |  |
3. How sustainability and environmental considerations in particular have been integrated into the Plan

3.1 The Plan sets out a strategy to create and sustain thriving communities and a more prosperous economy in Gateshead and Newcastle over a 20-year period. Central to the aims of the Councils is the need to deliver sustainable economic growth, seeking to minimise social inequalities, securing opportunities for regeneration and planning for infrastructure, whilst maintaining, protecting and enhancing the environment.

3.2 As noted in paragraph 2.3, the scoping stage of SA identified a set of Sustainability Objectives, established through a series of stakeholder workshops and in consultation with a steering group of officers from a range of disciplines. These objectives, contained within the framework used to assess the policies of the emerging Plan through the SA process include four Sustainability Objectives which relate directly to environmental considerations:

- Promote, enhance and respect our culture, heritage and diversity
- Adapt to and mitigate against the impacts of climate change:
  - Reduce our contribution to the causes of climate change
  - Make sure we adapt to the effects of climate change and mitigate against its impacts in future development
- Live within environmental limits, both locally and globally
- Protect and enhance our environmental assets and infrastructure

3.3 The Spatial Vision and Strategic Objectives of the Plan set out the broad issues that the Plan aims to address. Specifically, the Plan contains three Strategic Objectives that relate directly to environmental considerations:

- Ensure the development and use of land protects, preserves and enhances the quality of the natural, built and historic environment making the Urban Core a high quality exemplar for NewcastleGateshead and ensuring our communities are attractive, safe and sustainable.
- To reduce CO2 emissions from new development and future growth while adapting to the issues, mitigating adverse impacts and take advantage of the opportunities presented by climate change.
- Improve the function, usability and provision of our green infrastructure and public spaces by providing a network of green spaces and features which are connected and accessible for all.

3.4 The Plan’s Strategic Policies (policies CS5 to CS21 - those policies that relate to local authority-wide issues) include a number of policies that specifically deal with environmental considerations. Policy CS14 Wellbeing and Health; CS15 Place-Making; CS16 Climate Change; CS17 Flood Risk and Water Management; CS18 Green Infrastructure and the Natural Environment; CS19 Green Belt; CS20 Minerals, and; CS21 Waste provide criteria which seek to maintain, protect and enhance the quality of the environment. In addition to these policies, which have a direct influence on environmental issues, the implementation of the following policies would have a less direct, but nonetheless significant influence on environmental considerations: CS6 Employment Land; CS7 Retail and Centres; CS9 Existing Communities; CS13 Transport.

3.5 These Strategic Policies, dealing with topic-specific issues, are set within the context of the Plan’s overarching Spatial Strategy policies (CS1 - CS4). Of particular and
direct relevance to sustainability and environmental considerations is policy CS1 Spatial Strategy for Sustainable Growth. This policy sets broad principles for sustainable development in Gateshead and Newcastle, including identifying the overall quantity of development, and the broad locations where development will be accommodated or prioritised.

3.6 Nonetheless, it should be noted that the Plan is a strategic document that will be supported by more detailed policies in subsequent local development documents, where appropriate. These documents will be subject to separate SA.

Habitats Regulations Assessment

3.7 In accordance with the requirements of the Habitats Directive and the Habitats Regulations, a HRA Stage 1 Screening Report (November 2011) for the Plan was undertaken. The Screening Report noted that there are no European sites within the administrative areas of either Gateshead or Newcastle and therefore none within the combined Plan area.

3.8 The HRA Screening Report therefore considered the impact of the plan on the integrity of Natura 2000 sites located outside of the Plan area. The Scoping Report noted that there are two European sites outside of the plan area (Northumbria Coast SPA and North Pennine Moors SPA) which support wintering migratory wading bird populations that are highly mobile. Consequently, because the Tyne Estuary, intertidal mud and adjacent land within Gateshead are used by migratory waders, the Scoping Report considered the potential impacts on this issue in more detail.

3.9 Nevertheless, having assessed potential impacts on sites outside the Plan area, the HRA Screening Report concluded that any potential effects on Natura 2000 sites from the Plan policies are in all instances indirect and not considered to be significant or pose a threat to the site integrity or to the achievement of conservation objectives of any European sites. The Screening Report also concluded that any contribution from the Local Plan to ‘in combination’ effects would be adequately mitigated by the policies within the Plan. As a result, the Screening Report demonstrated that a further appraisal (Appropriate Assessment) of the significant adverse impacts caused by the Plan would not be required.

3.10 The SA recommended that modifications to the Plan through the course of its preparation, specifically the allocation of sites close to the River Tyne for development, required a ‘refresh’ of the HRA Stage 1 Screening Report to accompany the Submission Document. Like the previous HRA Screening Report, the revised report assesses the impacts of the Plan’s policies on the integrity of nearby European Sites. The revised HRA Screening report shares the previous Screening Report’s conclusions, and identifies that a further appraisal (the Appropriate Assessment) is therefore not required – a conclusion that Natural England agreed with when consulted.

4 How the Environmental Report (SA) has been taken into account

4.1 Plan preparation was carried out in a number of key stages. SA reports were produced to support each stage as appropriate, and were subject to a minimum of
six weeks consultation, published alongside other documents. The stages of plan preparation, and the SA reports that were produced, are identified in Table 1.

4.2 The Plan has evolved with input from the SA as an integral part of the process. Recommendations from the SA were considered alongside information from the Councils’ evidence base, and consultation responses. This process has informed both the overall scope of the Plan and the content of individual policies. Table 2 summarises key recommendations identified through the SA process, and how these recommendations have influenced specific elements of the Plan. SA of the Plan has been a detailed and iterative process, and it has therefore not been practical to provide an exhaustive list of recommendations and how they have been reflected in the Plan within this table. Rather, key recommendations for the sustainability of the Plan and their implementation have been represented. Policies or topic areas not referred to in this table were broadly supported throughout the SA process, and recommendations for significant modifications were not identified.

<table>
<thead>
<tr>
<th>Topic area</th>
<th>Recommendation</th>
<th>How this was taken into account, and reflected in the Plan as adopted</th>
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<tbody>
<tr>
<td>Strategic Policies</td>
<td>Greater recognition of how the Plan can help address equality of opportunity, particularly in terms of accessibility, and help meet the needs of different groups</td>
<td>Requirements of policy CS1, particularly clause 8.i, that all development will be: “Fully inclusive, irrespective of cultural background, ethnicity and age, to meet the diverse needs of all residents and communities” Policies for homes – CS9 Existing Communities, and CS11 Providing a range and choice of housing strengthen the Plan’s contribution to meeting the diverse needs of different groups Policy CS14 Wellbeing and Health refers specifically to equitable and inclusive environments</td>
</tr>
<tr>
<td>Include reference to active encouragement of community participation in planning within Neighbourhoods and Rural and Villages policies</td>
<td>The Councils’ Statements of Community Involvement are the appropriate document to provide this reference</td>
<td></td>
</tr>
<tr>
<td>Development of Metrogreen area of change could potentially have negative impact on flood risk in the area</td>
<td>Policy CS18 Green Infrastructure and the Natural Environment recognises the multifunctionality of green infrastructure (including for water management). Policy CS17 Flood Risk and Water Management sets policy to avoid and</td>
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Table 2
How specific recommendations from SA have been taken into account in the adopted Plan
<table>
<thead>
<tr>
<th>Area</th>
<th>Description</th>
<th>Notes</th>
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<tbody>
<tr>
<td></td>
<td>manage flood risk.</td>
<td>Policy AOC2 <em>Metrogreen</em> sets specific requirements to manage flood risk at the site. More detail on specific measures will be provided in subsequent Area Action Plan for Metrogreen.</td>
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<tr>
<td>Development of Dunston Hill neighbourhood growth area could potentially have negative impact on flood risk in the area</td>
<td>Policy CS18 <em>Green Infrastructure and the Natural Environment</em> recognises the multifunctionality of green infrastructure (including for water management). Policy CS17 <em>Flood Risk and Water Management</em> sets policy to avoid and manage flood risk. Policy GN1 <em>Dunston Hill</em> sets specific requirements to manage flood risk at the site.</td>
<td></td>
</tr>
<tr>
<td>Economic Prosperity</td>
<td>Make clear that employment opportunities will be inclusive and accessible for all</td>
<td>Policy CS5 <em>Employment and Economic Growth Priorities</em> requirement that targeted recruitment and training will improve skills and access for local people reflects strategic objectives around increasing residents’ skills and employment opportunities. Policies and text elsewhere in the Plan encourage equality of access to opportunities.</td>
</tr>
<tr>
<td>Homes</td>
<td>Acknowledge importance of retention and enhancement of existing community facilities</td>
<td>Policy CS9 <em>Existing Communities</em> includes a requirement to maintain and improve facilities (ie. including existing facilities)</td>
</tr>
<tr>
<td>Transport and Accessibility</td>
<td>Provide explicit reference to equality and diversity issues and health inequalities with regard to transport and access. Refer to accessibility and transport needs of disadvantaged groups</td>
<td>Inclusion of reference to promoting sustainable travel choices including “Improving equality of access to transport for everyone”. Additional policies and text within the plan, including CS1 <em>Spatial Strategy for Sustainable Growth</em>, and CS14 <em>Wellbeing and Health</em> aim to address equality and diversity issues and health inequalities. Good accessibility is also required through CS15 <em>Place-making</em>.</td>
</tr>
<tr>
<td>Wellbeing and Health</td>
<td>Suggest separating wellbeing and health, and equality and diversity issues, either to distinct policies, or to separate sub-headings within the same policy. This would strengthen the importance of each issue within the Plan and contribute to delivering separate goals.</td>
<td>Equality and diversity issues are acknowledged in a number of separate policies throughout the Plan. The Wellbeing and Health policy makes an important contribution to delivering equality and diversity objectives, but this contribution is supported by other policies and text.</td>
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<tr>
<td>Climate Change</td>
<td>Strengthen approach to sustainable design and constructions principles, thereby contributing to positive implications on the use of resources</td>
<td>Policy CS15 <em>Place-making</em> emphasises delivery of sustainable design. Policy CS16 <em>Climate Change</em> includes measures to require good standards of building design, and Government standards of sustainability</td>
</tr>
<tr>
<td>Green Infrastructure and the Natural Environment</td>
<td>Strengthen acknowledgement of equality and diversity obligations in reference to access to natural environment</td>
<td>Policy CS14 <em>Wellbeing and Health</em> includes reference to access for all to green spaces.</td>
</tr>
<tr>
<td></td>
<td>Include reference to protection and enhancement of geodiversity</td>
<td>Policy CS18 Green Infrastructure and the Natural Environment includes this reference</td>
</tr>
<tr>
<td>Urban Core</td>
<td>Need to ensure new development provides equality of opportunity, equality of access and inclusive design</td>
<td>Strategic Policies (in particular CS1 <em>Spatial Strategy for Sustainable Growth</em>, CS14 <em>Wellbeing and Health</em>, and CS15 <em>Place-making</em>) establish these requirements, and would be applied to development in the Urban Core</td>
</tr>
</tbody>
</table>

4.3 In general terms, the SA process has contributed to an approach to spatial development in the Plan that is capable of delivering a balance of broadly positive economic, social and environmental trends.

4.4 The appraisal of site specific policies (Annex C of the December 2013 SA report) concluded that, on balance, development of the sites identified would have broadly positive contribution to sustainability when environmental, social and economic objectives were considered. The SA concludes that if other policies of the Plan are rigorously applied, any potentially negative impacts should be avoided or mitigated.

4.5 The SA of the Submission Draft Plan (the modifications proposed to the Submission Document were subject to SA through an addendum report) concluded that if the policies set out in the Plan are fully implemented it should be possible for the Councils to achieve their strategic objectives and development goals whilst delivering progress in the economic, social and environmental objectives that make up the Sustainability Framework.

4.6 The SA identifies four key policies that set out the social sustainability criteria: CS1 *Spatial Strategy for Sustainable Growth*; CS9 *Existing Communities*; CS11 *Providing a
Range and Choice of Housing; CS14 Wellbeing and Health; CS15 Place Making. If these policies are adhered to, the Plan’s development goals should be achievable whilst maintaining and improving wellbeing, health, social inclusion, equalities and community cohesion.

4.7 A further four key policies are said to be of critical importance in setting out the longer term sustainability goals and standards of environmental protection for the historic and natural environment: CS16 Climate Change; CS17 Flood Risk and Water Management; CS18 Green Infrastructure and the Natural Environment; CS21 Waste. If these policies are adhered to the Councils’ development goals should be achievable without causing deterioration in environmental quality. The rigorous application of these policies should also adequately mitigate longer term challenges to sustainability, including climate change, pollution, biodiversity and geodiversity conservation, landscape and historic character, traffic and congestion, and the inappropriate use of land.

5 How opinions expressed in relation to relevant consultations on the SA reports have been taken into account

5.1 As highlighted throughout this statement, the adopted Plan has evolved through several stages of public consultation. At each stage, consultation on the Plan (or consultation on reports setting out progress on the plan, in the case of the 2012 Proposed Major Changes Reports) has been accompanied by an SA report.

5.2 The key stage in initiating the SA process, and establishing its parameters was publication, and consultation of the SA Scoping Report in April 2010. The Scoping Report contained the initial Baseline Review of relevant plans, programmes and strategies, and of the economic, environmental and baseline conditions. Informed by this review, and guidance from a steering group of Council officers from a range of disciplines, the SA Scoping Report proposed a Sustainability Appraisal Framework, including Sustainability Objectives. Consultation on the SA Scoping Report sought views from statutory consultees (English Heritage, the Environment Agency and Natural England), and a broad range of additional consultees, including local wildlife trusts, neighbouring local authorities, environmental bodies and other stakeholders.

5.3 Consultation feedback, particularly from statutory consultees was, where appropriate taken into account in finalising the scope of the SA, including the Sustainability Framework and Sustainability Objectives.

5.4 Consultation on SA reports invited all statutory consultees, other key stakeholders and groups (including residents) on the Councils’ consultation databases to comment on the content of the SA report. Throughout consultation there were no substantive responses which required revision of the SA reports, in terms of either the methodology used (the Sustainability Framework) or the conclusions and recommendations contained within the reports.

5.5 Consultation on the Plan has involved extensive engagement with the community. A number of elements of the Plan have garnered a high degree of interest from residents and other bodies. In particular, the Plan’s proposals to amend the Green Belt boundary in Gateshead and Newcastle and allocate a number of sites for
residential development have received a high number of objections. A small number of these objections questioned the integrity and validity of the SA process, relating to how the SA could find proposals to develop (predominantly green field) Green Belt land acceptable in terms of sustainability. The SA reports make clear, however, that if the policies of the Plan are rigorously applied, the potential negative environmental impacts of new development will be mitigated (as referred to in paragraphs 4.5 to 4.7 of this statement). Accommodating anticipated growth in housing and employment makes a strong contribution to achieving social and economic sustainability objectives, by providing new and existing residents with homes and opportunities for employment. As detailed in Annex C of the December 2013 SA report, the appraisal of site-specific policies within the Plan (including those policies which allocate village and neighbourhood growth areas for housing development), concluded that when social, environmental and economic sustainability objectives are considered as a whole, development of the sites (allied with the rigorous implementation of other policies in the Plan) would result in broadly positive sustainability impacts.

6 Reasons for choosing the Plan as adopted, in light of the other reasonable alternatives

6.1 The process of preparing the Plan has involved the consideration of a number of issues and options. Consideration of alternatives has been an intrinsic element of Plan preparation throughout the development of the Plan, in accordance with SEA regulations and 2012 Town and Country Planning Regulations. The reasons for selecting the strategy as the most sustainable option are outlined in SA reports, and summarised in the Compliance Statement published alongside the February 2014 Submission Document (available via the Councils’ websites).

6.2 Preparation of a joint Gateshead and Newcastle Core Strategy began with the approval of joint working arrangements in 2009. In 2011 both Councils agreed to collaborative working on preparation of a joint Urban Core Area Action Plan. Throughout the process of Plan preparation there have been significant changes in evidence and in regional and national planning policy and guidance. Perhaps the most significant being the coalition Government’s decisions to revoke the Regional Spatial Strategy for the North East of England, and replace Planning Policy Statements and Guidance with publication of the National Planning Policy Framework in 2012.

6.3 Throughout this shifting policy context, the strategic objectives of the Plan have remained unchanged (except for the combining of previously distinct objectives as a result of merging the Core Strategy and Urban Core Plan documents). Broad objectives that can be delivered through planning, of supporting sustainable economic growth, enhancement and provision of infrastructure and community facilities and services, and protecting and enhancing the built and natural environment are constants that have formed the basis of the options selected in the Plan.

6.4 Similarly, the overarching strategy aimed at delivering these objectives has changed little throughout plan preparation. Our evidence base (including independent projections of population, economic and household growth) has identified that
objectives around economic and social sustainability can only realistically be delivered through supporting growth in working age residents living within Gateshead and Newcastle.

6.5 The consequent population and economic growth has implications on the amount of land required for development, and our evidence of land availability has identified a shortfall in capacity in ‘urban’ locations. Accommodating this shortfall within Gateshead and Newcastle (rather than transferring housing growth to neighbouring authorities – considered to be an unsustainable option which would increase in-commuting into jobs in Gateshead and Newcastle, and contradict the Plan’s Sustainability Objectives) has necessitated an exploration of the potential for land outside the ‘urban’ area of Gateshead and Newcastle to accommodate growth.

6.6 The process of assessing the suitability of land in the Green Belt to accommodate housing development has been carried out by the Councils in the Strategic Land Review and Green Belt Assessment (SLR). The SLR comprised three parts, carried out separately by each Council, with a broadly aligned methodology. The SLR reviewed a large number of sites in the Green Belt around Gateshead and Newcastle (submitted to the Councils through a call for sites), and applied criteria based on nationally, regionally and locally set Green Belt Objectives to determine their suitability for housing development. The recommended sites were subject to extensive consultation as part of the Plan preparation process, and were also subject to further assessment regarding the sustainability and deliverability of housing development in the locations identified. The sites were also subject to assessment through the SA of site allocation policies in the Plan (as discussed at paragraph 4.4 of this statement), and their development in accordance with the policies of the Plan was considered to have broadly positive sustainability implications.

6.7 The Plan’s Strategic Policies (policies CS5 to CS21) were progressed through a detailed assessment of alternative options and their suitability when judged alongside the Councils’ evidence base, national planning policy, and the Plan’s Sustainability Objectives. The Compliance Statement provides details for the alternative options considered relating to each policy, and why the Plan as adopted has been chosen. Table 2 of this statement provides an explanation of alternative approaches recommended through the SA process, and how these recommendations have been implemented in the Plan.

7 The measures agreed to monitor the significant environmental effects of the implementation of the Plan

7.1 The SEA directive requires the significant environmental effects of implementing the plan to be monitored. The Plan incorporates a detailed monitoring framework which takes account of the monitoring needs of SA and the SEA directive.

7.2 The plan will be subject to regular and ongoing monitoring through a framework of indicators, including targets and timescales for delivery where possible. The programme of monitoring will assess the implementation, and effectiveness of policies within the Plan, and identify unforeseen impacts arising from the Plan to be identified. Monitoring will also provide an assessment of the delivery of the
strategic and sustainability objectives of the Plan, and will determine whether the effects predicted by the SA were accurate.

7.3 The SA emphasised the importance of robust monitoring mechanisms in contributing to the effective implementation of the Plan. Accordingly, the SA recommends a number of monitoring indicators (section 6.8 / table 6.4 of the December 2013 SA report) for inclusion in the Plan. These recommendations were considered alongside issues such as the availability of information and the robustness / appropriateness of performance indicators when determining the final monitoring framework contained within the Plan. Annex 3 of the Plan provides the detailed framework that will be used to monitor the implementation of the Plan, its contribution to achieving Sustainability Objectives, and significant environmental effects.