# Sustainability Appraisal adoption statement for Merton's Local Plan

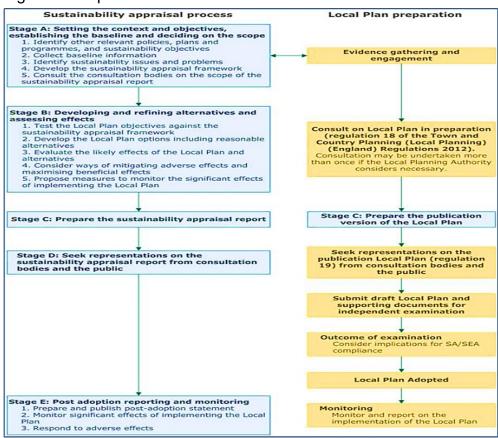
November 2024



# 1 Introduction

1.1. The national <u>Planning Policy Guidance</u> states a Sustainability Appraisal (SA) is 'a systematic process that must be carried out during the preparation of local plans and spatial development strategies'. The main purpose of <u>Sustainability Appraisal</u> is to promote sustainable development by integrating social, economic, and environmental considerations into the preparation of new or revised plans and strategies.

Figure 1: SA process for a Local Plan



- 1.2. <u>Strategic Environmental Assessment Regulations 2004</u> Schedule 2 (6) states that:

  The 'likely significant' effects on the environment, including short-, medium- and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as:
  - a) Biodiversity.
  - b) Population.
  - c) Human health.
  - d) Fauna.
  - e) Flora.
  - f) Soil.
  - g) Water.

- h) Air.
- i) Climatic factors.
- i) Material assets.
- k) Heritage.
- I) Landscape; and
- m) The inter-relationship between the issues.
- 1.3. In accordance with the <u>Planning and Compulsory Purchase Act 2004</u> Section 19 (5)2, the Local Plan (hereby referred to as the 'Plan') was subject to SAs, which integrates the requirements of SA and <u>Strategic Environmental Assessment (SEA)</u>. The SEA stages and process can be found in appendix A of this report. A SA provides an integrated and ongoing assessment of the likely significant effects of implementing a plan and recommends ways to avoid or minimise negative effects and maximise positive impacts. The national <u>Planning Practice Guidance (PPG)</u> advises that the requirements for both SA and SEA can be met through a single appraisal process.

### **This SA Adoption Statement**

1.4. Regulation 16 of the SEA Regulations sets out the post adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA adoption statement', and inform the public and statutory consultation bodies about the availability of these documents. The statutory bodies are <a href="Historic England">Historic England</a>, <a href="Natural England">Natural England</a> and the <a href="Environment Agency">Environment Agency</a>. In addition Regulation 26 of the <a href="Town and Country Planning">Town and Country Planning</a> (Local Planning) (England) Regulations (2012) sets out a need to publish the final SA Report alongside the Adopted Local Plan.

- 1.5. In the context of the requirements of the SEA Regulations, this SA Adoption Statement for the Plan must explain:
  - How environmental (and sustainability) considerations have been integrated into the Local Plan.
  - How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
  - The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered.
  - How the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been considered.
  - The measures that are to be taken to monitor the significant effects identified for the Local Plan.

#### The Plan

- 1.6. The Plan was submitted to the <u>Secretary of State on the 2nd of December 2021</u> for the <u>Examination in Public (EiP)</u>. The Inspectors held Public Hearings in June and October 2022. On 7<sup>th</sup> October 2024 the council received the Planning Inspectors Report which concluded that the Plan is legally compliant and 'sound¹.' The Plan was formally adopted at the <u>Full Council meeting on 20<sup>th</sup> of November 2024</u>. Upon its adoption, it carries full weight in the consideration of all submitted planning applications and supersedes the following Local Plans:
  - Core Planning Strategy 2011(<u>OD27</u>).
  - Site and Policies Plan and; Policies Map 2014 (OD26).
- 2 How the Local Plan integrated environmental and sustainability considerations.
- 2.1. The Plan has been prepared through several stages since work begun in 2018. Sustainability and environmental considerations have been integrated into the plan in various ways including by:
  - Continuous engagement with key stakeholders (including Natural England, Historic England, Environment Agency and infrastructure providers for example Thames Water) and the public on the emerging Plan and its environmental and sustainability considerations.
  - Robust evidence produced both by or on behalf of the council, covering environmental and sustainability consideration for example green and blue infrastructure, flood risk management, pollutants and climate change.

<sup>&</sup>lt;sup>1</sup> The examination assessed whether the Plan was prepared in accordance with legal and procedural requirements and whether it is 'sound', in accordance with paragraph 35 of the <u>National Planning Policy Framework (NPPF)</u>. A Local Plan is considered 'sound' if it is: Positively prepared, Justified, Effective and Consistent with national policy.

- The consideration of <u>National Planning Policy Framework (NPPF)</u>, the <u>London Plan</u> and the objectives of other relevant plans/programmes and legislation
- Liaison with other Local Planning Authorities via the Duty to Cooperate.
- Ongoing appraisal of the Plan through the SA (incorporating SEA) and the Habitats Regulation Assessment (HRA) processes.
- 2.2. The SA Report (the 'environmental report') has been reviewed and published with each iteration of the Plan's development and consultation stages; describing the methodology used, the negative and positive effects of the Plan identified, cumulative effects, considering 'reasonable alternatives', recommendations to avoid or minimise negative effects and maximise positive effects.
- 2.3. The SA used a framework of objectives and decision-making questions (set out in the SA's including the <u>submission SA/SEA OD05</u>) to describe, analyse and compare the potential environmental and sustainability effects of the Plan. This framework known as the SA and decision-making framework, was developed and refined through consultation with statutory consultation bodies, key stakeholders, residents and other consultees. The SA objectives were developed by identifying the sustainability issues based on a review of relevant plans/programmes/legislation and the sustainability baseline analysis in stage A of the SA process (SA/SEA scoping report <u>OD18</u>).
- 2.4. Figure 2 below identifies how the Local Plan and the SA/SEA aligned for public consultation and how the SA considered assessed the Plan's development (including (reasonable alternatives').

Figure 2: Stages of Local Plan preparation and how the SA was considered

Local plan stage	SA stage	How SA Report was Considered
Call for sites consultation on Stage 1 of Merton's New Local Plan held between October 2017 and January 2018, included a 'call for sites.	SA/SEA scoping report stage A (OD18).	The SA/SEA scoping report (OD18) identified the issues in Merton in the context of environmental, social and economic. It looked at the most up to date data to also identify problems and issues in Merton. This work formed the SA Assessment Framework and decision-making criteria, which led to developing the SA objectives. These objectives would be used to assess the Plan.
Stage 2 consultation held between 31 October 2018 and 28 January 2019.	SA report stage B (OD17).	The SA report (stage b – OD17) established the strategic approach for the Plan by way of:  • Assessing four strategic options were assessed (see section four).

Local plan stage	SA stage	How SA Report was Considered
		Testing the Strategic Objectives of the Local Plan.
		<ul> <li>Evaluated the effects of the plan (policies, site allocation and Policies Map).</li> </ul>
		South Wimbledon local centre designation (including alternatives).
		Measures to monitor the environmental effects of the Local Plan.
Stage 2a public consultation held	SA stage B ( <u>0D16</u> ).	The SA developed and refined alternatives and assessing the effects by:
between 13 <sup>th</sup> November 2020 and 1 <sup>st</sup> February 2021.		<ul> <li>Evaluated the Plan against the SEA/SA objectives considering proposed Main Modifications following public consultation and local evidence.</li> </ul>
		Developed strategic alternatives.
		Predicted the effects of the Plan including reasonable alternatives.
		Evaluated the effects of the Plan.
		Outlined mitigating adverse effects.
		Proposed measures to monitor the environmental effect of the Local Plan.
		<ul> <li>Consulted the public and the statutory environmental bodies on the draft Plan and report.</li> </ul>
Stage 3 (Regulation 19) Local Plan	Submission SA/SEA	The submission SA/SEA
publication consultation held between July 2021 and 6 <sup>th</sup> September 2021.	stage 3 REG 19 ( <u>0D3</u> ) – Stage C -D.	<ul> <li>Assessed the Plan against the SEA/SA objectives considering proposed Main Modifications following public consultation and local evidence.</li> </ul>
		Assessed the effects of the Plan.
		Reasonable alternatives.
		Evaluated the effects of the Plan.
		Outline mitigating adverse effects.
		<ul> <li>Proposed measures to monitor the environmental effect of the Local Plan.</li> </ul>
		<ul> <li>Consulted the public and the statutory environmental bodies on the draft Plan and report.</li> </ul>
Response to the Inspectors	SA/SEA submission	SA/SEA submission including proposed amendments November 2021
Preliminary Matters dated 02 March	including proposed	revised ( <u>0D5</u> ).
2022 ( <u>LBM01</u> ).	amendments November	Evaluated the Plan's strategic objectives.
	2021 revised ( <u>0D5</u> ).	Assessed the Plan against the SEA/SA objectives considering

Local plan stage	SA stage	How SA Report was Considered
Matters and Issues Questions (MIQs) (INSP03-03A) raised by the independent Planning Inspector dated April 2022 and as part of the examination process, Merton Council proposed Main Modifications (MM) to the draft Local Plan to ensure the Plan is sound following the tests set out in the National Planning Policy Framework paragraph 35.	SA/SEA Main Modifications May 2022 (LBM06).	proposed Main Modifications following public consultation and local evidence.  Examine reasonable alternatives. Evaluate the effects of the Plan. Examine mitigating adverse effects of the Plan. Proposing measures to monitor the environmental effect of the Local Plan. Consulting the public and the statutory environmental bodies on the draft Plan and report.  SA/SEA Main Modifications May 2022 (LBM06). Following the Matters and Issues Questions (MIQs) raised by the independent Planning Inspectors dated April 2022. The council proposed MMs to the draft Local Plan for soundness following the tests set out in the NPPF paragraph 35. This SA/SEA: Presented the findings of the screening of proposed modifications. Considered of alternatives. Appraised the proposed modifications. Consulted the public and the statutory environmental bodies on
Post Hearing Jan- February 2024.	SA/SEA Main Modification January 2024 ( <u>LBM32</u> )	the draft Plan and report.  Assessed the proposed Main Modifications (MMs) of the Local Plan. It considers matters raised during the hearing sessions (June and October 2022) and dialogue with the Planning Inspectors throughout the Examination, including the Post Hearing letter dated March 2023 (INSP22) and the Post Hearings clarification letter dated 28th April 2023 (INSP23). The SA determined if the MMs significantly affect the findings of the submission SA/SEA Report and if further appraisal work is required. The proposed changes and findings of the screening including the rationale for screening 'out' (no implication for the submission SA findings) or screening 'in' (assessment needed).
Further MM consultation July – 4 <sup>th</sup> August 2024.	SA Further MM ( <u>LBM43</u> )	A further MM consultation was held (July – 4 <sup>th</sup> August 2024). The Inspectors' cover note on Further Main Modification ( <u>INSP30</u> ) required the council to consult for four weeks on a drafting error identified in relation to Main Modification 114 in the council's post hearings

Local plan stage	SA stage	How SA Report was Considered
		consultation that ended in March 2024. The drafting error meant that the map relating to Site Allocation Wi3 (All England Lawn Tennis Club,
		Church Road SW19) found in Document (LMB29) was incorrect, in,
		relation to showing the extent of Metropolitan Open Land. The same map
		was correct in another main modification in ( <u>LBM29</u> ), in ( <u>LBM31 (page</u>
		309) and the Merton's online digital policies map.
Post adoption and monitoring.	SA adoption statement	SA Adoption Statement
	(this report) 2024 -stage	Prepare and publish a post adoption statement.
	E (this report).	Monitor the significant effects of implementing the Plan.
		Respond to adverse effects.

## **Habitats Regulations Assessment (HRA)**

- 2.5. In addition to the SA/SEA, environmental considerations are integrated into the Plan by the undertaking of a Habitats Regulation Assessment (HRA). Under the <u>Conservation of Habitats and Species Regulations (2019)</u> (as amended) known as the Habitats Regulations, the council is required to carry out an HRA. It tests whether a plan or project proposal could significantly harm the designated features of the National Sites Network (formally known as European sites) which includes Special Areas of Protection, Special Areas of Conservation and Ramsar Sites.
- 2.6. The council must determine whether any elements of the Plan are likely to negatively affect protected sites. If there is found to be a significant negative impact, then progression onto later <u>stages of the HRA</u> process will be required. Where negative effects are identified other options should be examined to avoid any potential for damaging effects.
- 2.7. The council caried out 3 HRA Reports as follows:
  - Habitat Regulation Assessment Report July 2021 (OD12).
  - Habitat Regulation Assessment Report on the Main Modifications of the Local Plan May 2022 (<u>LBM08</u>).
  - Habitat Regulation Assessment Report on the Post Hearings January 2024 (<u>LBM33</u>).
- 2.8. The above listed HRAs found no 'likely significant effect' (either alone or in combination). Consequently, there was no requirement for an Appropriate Assessment (later stage of the HRA process).
- 3 How the opinions expressed during the consultation periods have been considered

- 3.1. The SEA Regulations requires that the SA Adoption Statement includes a description of how the opinions expressed during public consultations on the plan and SA Report were considered. The council considered all responses from consultations and if appropriate (in conformity with national and regional planning policy or supported by robust evidence) the appropriate change(s) was made to the Plan. All changes were subject to the SA/SEA process to test their likely impact.
- 3.2. The findings of the SA process informed the council's outline reasons for selecting the preferred approach. The council consulted with the statutory environment bodies, the Environment Agency, Historic England and Natural England on the SA/SEA and other support assessments such as the HRA; in accordance with their respective legislation. The council adopted all the recommendations by the fore name bodies for the SA/SEA.
- 3.3. All responses received are publicly available on the council's <u>website</u>. The council produced a Statement of consultation in accordance with Regulation 22(1)(c) (<u>OD8</u>). Figure 2 above provides the links to the individual consultation stages responses in column named 'Local Plan stage'.
- 4 Reasons for choosing the Local Plan as adopted, considering other reasonable alternatives.
- 4.1. A review of the then Plan² was carried out including to see if the policies were still in conformity with both national and regional policy and they were performing well (as reported in the <u>Authority Monitoring Report</u> (AMR)). Several policies needing updating (for example policies towards zero carbon and adapting to climate change). Considering that the Local Plans for all London Boroughs are required to be in general conformity with the London Plan for the most part the policies and objectives remained broadly similar (for example increasing the supply of new homes, reducing air pollution and encouraging active travel). In this context, national and regional planning policies and any instructions in these documents to local authorities are the starting point for the development of potential alternatives for the Plan. It should be noted that 'general conformity' does not mean absolute duplication on all matters.
- 4.2. Thus the requirement to be in '*conformity*' with national and regional policies can restrict the scope of reasonable alternatives we can explore. Any deviation must be supported by robust evidence, which shows a 'just' reason for the deviation. It would be for the inspector to decide at examination if a deviation is 'just', based on the evidence, planning policies and legislation.

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<sup>&</sup>lt;sup>2</sup> Core Planning Strategy 2011, Site and Policies Plan 2014 and Policies Map 2014

- 4.3. The SA/SEA (OD17) assessed four options for the Local Plan 'reasonable alternatives' and policy direction these were:
  - Option 1: Focus on regeneration: Continue to develop and grow town centres.
  - Option 2: Focus on public transport: Develop and grow within areas with good transport links.
  - Option 3: Focus on renewal: Develop and grow in areas of deprivation.
  - Option 4: Allow the market to lead (Laissez faire approach): No Local Plan.
- 4.4. The SA/SEA found the likely effects of options 1 and 2 were remarkably similar as both would involve focusing development on town centres.
- 4.5. For option 2 the SA/SEA found development would be focused along the areas with good transport links, which would largely be town centres and areas of regeneration. This would have similar effects as option 1 in terms of development but a significant effect on economic growth. Overall the SA/SEA found both options 1 and 2 will have largely positive effects on the social and economic objectives as development would be focused near to, or accessible from, the primary areas where existing jobs, services and facilities are located.
- 4.6. Under option 3 there was generally positive effects on the social objectives in areas of housing and potential job creation and opportunities.
- 4.7. Under option 4 (no new Plan), the SA/SEA found the likely effects to be negative. This is because without a Plan, development would not be shaped, planned or managed. Leading to development proposals coming forward in unsuitable locations for example, in areas with poor transport infrastructure or more critically, unsuitable housing being delivered not meeting local needs for example no affordable housing. Furthermore, without a Plan the quality and design of development may cause harm to heritage, the climate, biodiversity and increased flood risk.
- 4.8. The Plan's direction was a hybrid of Options 1-3. At each iteration of the SA/SEA process provided an opportunity to explore 'reasonable alternatives' again. The Inspectors Report found that the council had 'suitably addressed reasonable alternative' by way of the SA/SEA process.
- Measures to be taken to monitor the significant environmental and sustainability effects caused by the implementation of the Local Plan
- 5.1. The SEA Regulations 17 (1) states that "The responsible authority shall monitor the significant environmental effects

- of the implementation of each plan or programme with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action". The Regulations are clear that it is not necessary to monitor everything; instead monitoring should focus on significant effects.
- 5.2. The Regulations states the SA Adoption Statement should set out '...the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.' The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan's objectives. This will enable appropriate interventions to be undertaken if monitoring highlights that the implementation of the policy performance is not effective, is not delivering its aims and is not environmentally, socially or economically sustainable.

# Stage E: Monitoring the significant effects of implementing the Plan

- 5.3. Stage E of the SEA process (see Appendix A) involves setting out how the monitoring of the significant effects, measuring and monitoring the Plans performance against sustainability objectives. The sustainability effects of implementing the Plan must be monitored to identify unforeseen adverse effects and to be able to undertake remedial action.
- 5.4. Although monitoring is not required until the plan is put into effect, the consideration of monitoring and indicators has been undertaken throughout the SA process. The SA provides a monitoring framework that will identify sustainability effects. It's intended to help form the basis of the AMR's monitoring of the sustainability effects on a regular basis following the adoption of the Local Plan. The SA monitoring indicators can be found in figure 3 below.

Figure 3: SA/SEA monitoring indicators

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
Air quality	Number of days p.a. when air	Merton Council by way of	3 years.
To reduce emissions and concentrations of harmful	pollution is moderate or high for	Merton's Annual	
atmospheric pollutants, particularly in areas of poorest air	PM10*	Monitoring Report (AMR).	
quality and reduce exposure.			
	*Daily mean particles (PM10) not to		
	exceed 50 micrograms per cubic		
	metre - more than 35 times a year		
	at any measuring site.		

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
Biodiversity To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	Changes of in areas of biodiversity importance.	Merton Council by way of Merton's AMR (Authority Monitoring Report).	3 years.
Land and soil condition and pollutants To conserve Merton's geodiversity and protect soils from development and over intensive use.	Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.	Environment Agency and Merton Council by way of Merton's AMR.	Every year.
Sustainable land use To make the best and most efficient use of land to support sustainable patterns and forms of development.	Planking permission grant and completed.	Merton Council by way of Merton's AMR.	Every year.
Heritage (including architectural and archaeological heritage)  To conserve and enhance the existing historic and built environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural, through high quality design and protection of open space, valued views and historic assets.	Number of heritage assets at risk of from neglect, decay, inappropriate development and environmental impact such as air quality.	Merton Council by way of Merton's AMR (Authority Monitoring Report).	Every year.
Flood risk management To manage the risk of flooding from all sources and improve the resilience of people and property to flooding.	Number of planning permissions granted contrary to Environment Agency advice.  Number and location of Environment Agency flood warnings issued across Merton each year.	Environment Agency and Merton Council by way of Merton's AMR.	Every year.
Climate change To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050.	Reduction in carbon emissions from new build developments.	Merton Council by way of Merton's AMR.	Every 3 years.

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
	Reporting on carbon offsetting proposed where on site reduction is not achievable.	Merton Council by way of Merton's AMR and Infrastructure Funding Statement.	Annually
Noise and vibration  To minimise noise, vibration levels and disruption to people and communities.	An increase in areas of the Noise action planning important areas.	DEFRA.	3 years.
Water quality To protect and enhance Merton's water bodies.	Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.  River water bodies classified under the Water Framework Directive to achieve good ecological status.	Environment Agency and Merton Council by way of Merton's AMR.	Every year.
Water consumption Ensuring that Merton has a sustainable water supply, drainage and sewerage system.	Number of developments approved against the recommendation of the statutory water / sewerage undertaker on low pressure / flooding grounds.  Number and location of water pollution incidents reported to the Environment Agency across Merton annually.  Water quality status of water bodies across.	Thames Water and Sutton and East Surrey Water companies.	3 years.
	Proportion of new residential developments with a maximum	Merton Council by way of the AMR.	

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
	water consumption target of 105 litres/person/day.	,	
Open space and nature To protect, connect and enhance Merton natural environment (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity.	The proportion of net loss open space for development apart for educational establishments.  Metres of main river improved and restored across Merton Biodiversity Net Gain delivered across Merton.	Merton Council by way of the AMR.	Every year
Sustainable transport To enhance and improve connectivity for all and increase the proportion of journeys made by sustainable and active transport modes.	The proportion of journeys made by public transport and sustainable mode of travel.  Increase in footfall at bus stops, underground, tram stops and railway stations.	Merton Council and Transport for London (TfL) by way of the AMR.	3 years
Energy use To manage and reduce demand for energy.	Average percentage improvement over Part L of the Building Regulations.	Merton Council by way of the AMR.	2 years
Health and wellbeing.  To facilitate and improve the health and wellbeing of the population, reduce health inequalities and deliver safer and more secure communities.	Delivery of healthcare facilities identified in Merton's Local Plan Number of people taking up physical activities and stating they are in 'good health.'  Number of Health Impact Assessments carried out and type of development.	Merton Council, Merton Public Health, NHS (National Health Service) England, as part of the Integrated Care System and the South West London NHS and other health and wellbeing partners.	3-5 years 3- 5 years.

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
		Merton Council and Merton Public Health.	
<b>Housing</b> To provide type, quality and tenure of housing (including specialist and affordable provision) to better meet Merton's demographic change and local housing demand.	Progress against borough wide affordable housing target.  Number of homes built	Merton Council by way of the AMR.	Annually.
Safe environments To contribute to safe and secure environments for all people including the 9 Protected Characteristics.	Number of Health Impact Assessments carried out and type of development.	Merton Council and Merton Public Health.	3 years.
Infrastructure To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet	Healthcare provision and the number of pharmacies and any gaps in provision in the borough.	Infrastructure Delivery Plan (live document).	Annually.
population and demographic change in line with sustainable development and to support economic competitiveness.		Public Health, Pharmacy Needs Assessment.	5 years
<b>Design</b> To create attractive, mixed-use neighbourhoods, ensuring new buildings and spaces are appropriately designed and accessible, which promote and enhance a sense of place and distinctiveness, reducing the need to travel by motorised transport.	Increase number of major schemes reviewed by the Design Review Panel at pre – application stage.	Merton Council by way of the AMR.	Annually.
Local employment To develop and maintain a healthy labour market.	Number of people unemployed  Number of new jobs created.	Merton Council, Merton Chamber of Commerce and Jobcentre Plus.	Every year.
Education and skills To ensure the education and skills provision meets the needs of Merton residents existing and future labour market and improves life chances for all, including people with disabilities and Black, Asian and other minority ethnic groups.	Deliver to meet statutory delivery to secure sufficient school places.  Number of 16- 24-year-olds in training or apprenticeships or work programmes	Merton Council by way of the AMR.	Every year.
	Number of people employed or in training as part of large or regeneration developments.		

Sustainability Objectives	Monitoring indicator	Monitored by	Timeframe
Economic growth and town centres To increase the vitality and viability of existing town centres, local centres and parades.	Maintain the retail vacancy rate below national and regional rates.	Merton Council by way of the AMR.	Every year.

# Appendix A: SEA stages.

Figure 4: SEA stages

SEA stages and tasks	Purpose
Stage A: Setting the context and objectives, establishin	ng the baseline and deciding on the scope.
Identifying other relevant plans, programmes and environmental protection objectives	To establish how the plan or programme is affected by outside factors, to suggest ideas for how any constraints can be addressed, and to help to identify SEA objectives.
Collecting baseline information	To provide an evidence base for environmental problems, prediction of effects, and monitoring; to help in the development of SEA objectives.
Identifying environmental problems	To help focus the SEA and streamline the later stages, including baseline information analysis, setting of the SEA objectives, prediction of effects and monitoring.
Developing SEA objectives	To provide a means by which the environmental performance of the plan or programme and alternatives can be assessed.
	To ensure that the SEA covers the likely significant environmental effects of the plan or programme.
Stage B: Developing and refining alternatives and asse	essing effects.
Testing the plan or programme objectives against the SEA objectives	To identify potential synergies or inconsistencies between the objectives of the plan or programme and the SEA objectives and help in developing alternatives.
Developing strategic alternatives	To develop and refine strategic alternatives.
Predicting the effects of the plan or programme, including alternatives	To predict the significant environmental effects of the plan or programme and alternatives.
Evaluating the effects of the plan or programme, including alternatives	To evaluate the predicted effects of the plan or programme and its alternatives and assist in the refinement of the plan or programme.
Mitigating adverse effects	To ensure that adverse effects are identified, and potential mitigation measures are considered.
Proposing measures to monitor the environmental effects of plan or programme implementation.	To detail the means by which the environmental performance of the plan or programme can be assessed.
Stage C: Preparing the Environmental Report	
Preparing the Environmental Report	To present the predicted environmental effects of the plan or programme, including alternatives, in a form suitable for public consultation and use by decision-makers.

Stage D: Consulting on the draft plan or programme ar	nd the Environmental Report
Consulting the public and Consultation Bodies on the draft plan or programme and the Environmental Report	To give the public and the Consultation Bodies an opportunity to express their opinions on the findings of the Environmental Report and to use it as a reference point in commenting on the plan or programme.  To gather more information through the opinions and concerns of the public.
Assessing significant changes	To ensure that the environmental implications of any significant changes to the draft plan or programme at this stage are assessed and considered.
Making decisions and providing information	To provide information on how the Environmental Report and consultees' opinions were considered in deciding the final form of the plan or programme to be adopted.
Stage E: Monitoring the significant effects of implemen	ting the plan or programme on the environment.
Developing aims and methods for monitoring.	To track the environmental effects of the plan or programme to show whether they are as predicted; to help identify adverse effects.
Responding to adverse effects	To prepare for appropriate responses where adverse effects are identified.