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**BRENTWOOD LOCAL PLAN – PROPOSED SUBMISSION VERSION****REVIEW OF SUSTAINABILITY APPRAISAL****1.0 Introduction**

- 1.1 This note sets out the conclusions of a review of the Sustainability Appraisal (SA) process to date to support the Brentwood Local Plan – Proposed Submission Version (Regulation 19 stage). The review draws on, and updates, previous review work (by Barton Willmore) of the January 2018 Interim SA Report and Non-Technical Summary prepared by Aecom on behalf of Brentwood Borough Council (BBC) and submitted for consultation at Regulation 18 stage alongside the draft Plan.
- 1.2 The review has focused on the latest iteration of the SA report (January 2019 – prepared by Aecom on behalf of BBC) but reference has been made to earlier reports going back as far as the 2013 SA Scoping Report, where necessary.
- 1.3 In addition to a review against regulatory requirements, a site-specific review has also been undertaken to consider how the Officers Meadow site is appraised in the SA report.

**2.0 Purpose of Review**

- 2.1 A review of the SA documents has been undertaken against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations") and Section 19 of the Planning and Compulsory Purchase Act 2004 (the "Act"), which sets out requirements for SA. SA is a complex and legalistic process and should be undertaken iteratively, alongside the preparation of the Plan.
- 2.2 A Local Plan must be prepared in accordance with Section 39 of the Act "*with the objective of contributing to the achievement of sustainable development*". It should therefore be informed by the SA process, which itself must comply with the SEA Regulations.
- 2.3 The review has sought to identify any areas of the SA that would benefit from further focus or clarity in order to increase the likelihood of the Plan being found sound at Examination.
- 2.4 The review at Regulation 18 stage identified no serious deficiencies but suggested some areas that would benefit from further explanation and/or evidence to support the Plan. This

review has focused on these areas in particular and also considers how the Officer's Meadow site has been appraised.

### **3.0 Review Summary**

3.1 The full review is included at Appendix 1. It uses a "traffic light" scoring system to identify areas that would benefit from improvement (amber) and those elements of the SA process that are considered to comply fully with the requirements (green). As for the review of the Interim SA (January 2018), no areas of major deficiency were identified in the SA (red).

3.2 Some parts of the SA were given an amber score at the Regulation 18 stage and recommendations were made for improvement. Several of these areas have been improved in the January 2019 SA, notably the following:

- **Cumulative effects** – more discussion is included on cumulative effects, both in terms of consultees' concerns and how they have been assessed/addressed through the iterative appraisal and plan-making process and in respect of certain proposed strategic sites, including Dunton Hills Garden Village. A dedicated section on cumulative effects is included in the report (para 9.14.4);
- **Mitigation measures** – it is acknowledged that it is difficult to appraise alternative spatial strategies and strategic sites on a completely level playing field, with/without mitigation as some is inherent to site location and it is hard to differentiate between what is part of a site's character and what would be design mitigation. The SA report contains description of mitigation considered throughout the appraisal process and the need for a critical mass of development in a certain location to be able to deliver community infrastructure and low carbon energy systems (including at Officers Meadow). The SA report recommends further site-specific policy to make the most of the climate change mitigation opportunity at Dunton Hills Garden Village.

3.3 The following areas of the SA are not as complete as they could be (in line with comments on the January 2018 SA report at Regulation 18 stage), but this is not a serious deficiency.

- **Baseline data** – Review baseline data to ensure that it is as up to date as possible (with particular focus on housing, employment and economy where more recent statistics may be available);

- **European sites** – Provide more clarity around the Habitats Regulations Assessment (HRA) screening assessment being undertaken in parallel, noting, in the biodiversity section of the baseline, that there are no European designated ecological sites that need to be considered through SA.

3.4 Describing and assessing the reasonable alternatives was considered to be an area in which the SA performed well at Regulation 18 stage. Further information has been provided in the January 2019 SA Report, to account for representations made at Regulation 18 stage and additional information, particularly around the potential to provide more homes than Local Housing Need (LHN). The SA Report acknowledges the findings of the Brentwood Borough Strategic Housing Market Assessment Part One (October 2018), which states at least 380 dwellings per annum (dpa) but discussed the Government consultation around the methodology for which housing projection to base figures on. As it has been confirmed that the 2014-based household projections are to be used, there would be a need for up to 452 dpa.

3.5 Providing above LHN was considered at early stages of plan-making and was reported in the January 2018 SA Report. Consultation on the plan and SA has led to the potential for the Brentwood Local Plan providing unmet need elsewhere to be explored. Table 5.1 of the January 2019 SA Report presents the latest situation in respect of plans being progressed by neighbouring authorities. There is also discussion around the need to consider the possibility of providing above LHN to more fully provide for affordable housing needs. There is no direct link between this table and the appraisal that follows. It is left to the Plan to set out the assumptions around the final numbers and delivery.

3.6 Table 8.1 of the January 2019 SA Report summarises all sources of housing to be delivered over the 17-year plan period: a total of 7,787 homes. This includes 825 north of Shenfield (including Officers Meadow).

#### **4.0 Support for Officers Meadow**

4.1 The proposals for strategic housing and employment development north of Shenfield is discussed throughout the SA report. It features particularly in Chapter 5 Selecting the Reasonable Alternatives and Chapter 6 Appraisal of the Reasonable Alternatives, as would be expected. As a strategic allocation in the Plan, its merits are then discussed in Chapter 9 Appraisal of Proposed Submission Plan. Research has shown that 35% affordable could be provided by the sites identified in the plan.

- 4.2 Para 9.4.3 highlights the critical mass of the proposed allocation north of Shenfield (825 dwellings), which would be large enough to support a primary school and additional community infrastructure including a quiet lane for pedestrians and cyclists. It is also acknowledged that the development of the site has the potential to enable a modal shift away from the private car. Para 9.7.2 acknowledges that the increase in housing numbers proposed at that location since the 2016 plan “*gives rise to limited additional concerns*”. Given that the evidence base, including the 2019 Landscape Capacity Study, shows that the site is fairly unconstrained (in landscape terms having high or high-medium split capacity) and being contained between the A12 and railway, this is supported.
- 4.3 Appendix III – Site Options Appraisal presents the detailed analysis of Officers Meadow using GIS methodology in Table C. The site scores well for three topics: Local Nature Reserve (i.e. not on/near one), primary school and secondary school (proximity to). It scores poorly for five topics (flood risk, woodland, Green Belt, agricultural land and GP (access to)). It scores particularly poorly for local wildlife site and ancient woodland. No issue/score is given for seven topics. Whilst some of these scores are considered to be too pessimistic, it is appreciated that they are based on GIS data layers only and a defined list of attributes. Visually, it is clear that the site scores better (at a high level, considering the “traffic light” scoring) than the unallocated sites, and better than several of the other proposed allocations. Table 1 below shows how the Officers Meadow site scores very favourably against the sustainability objectives when all available information is taken into account.
- 4.4 The site is appraised objectively and in the same manner as other sites in the main report, with consideration given to more recent masterplanning work done for the site. This is helpful as it demonstrates further how the positive impacts can be maximised and any potential negative impacts minimised, at a sustainable location on the urban fringe. Table 1 below summarises the key points relating to development at Officers Meadow using the SA Report’s sustainability framework and the high-level colour coded scoring system used for the rapid analysis of sites in the SA. It reflects the site location, constraints and opportunities and masterplanning work undertaken to date. This scoring system has been used as it is more granular than the red/green/white approach used for appraising the reasonable alternatives in the January 2019 SA Report and therefore reflects the level of detail available for the individual site.

**Table 1 Appraisal of Officers Meadow using SA Framework**

**Key =** Dark green = site performs particularly well, Light green = site performs well, No shading = no issue, Amber = site performs poorly, Red = site performs particularly poorly

<b>Objective</b>	<b>Score</b>	<b>Commentary</b>
Air Quality		Not in Air Quality Management Area but A12 in close proximity. Potential to enable modal shift away from private car and reduce emissions.
Biodiversity		Agricultural land so unlikely to be of high ecological value. Part of the site has been used as a construction compound for Network Rail and the Queen Elizabeth Line. There would have been some impacts on habitats. Boundary hedgerows and mature trees to be retained within green infrastructure of the development. Area of ancient woodland/LWS to be retained. Potential to enhance biodiversity and networks by converting the land from agricultural use.
Climate change mitigation		Potential to enable modal shift away from private car and reduce emissions. Scale of development of a critical mass to incorporate low carbon / district heating and energy systems.
Community and wellbeing		Surrounding land uses include primary school and residential properties. Development would assimilate well and provide the opportunity for further community infrastructure (including school) and enhanced pedestrian and cycle links, including better connection to Shenfield station.
Economy and employment		The wider site (North of Shenfield) also has a proposed allocation for 2 hectares of employment land which would enable co-location of uses and be of benefit to the economy (and also potentially reduce commuting).

		Good highway access to Chelmsford (A1023) and potential pedestrian access to Shenfield Station to access jobs.
Flooding		Relatively flat topography allowing drainage towards River Wid. Site partially in a critical drainage zone. Site predominantly located in area at low risk of flooding. Development to be planned around the areas at greater risk of flood risk. A suitable drainage strategy, including SUDS would be incorporated in the design to manage surface water and so that the development is resilient to climate change and increased frequency of extreme rainfall events.
Heritage		No Conservation Area within site or nearby. Low numbers of heritage assets in area. Grade II listed building on A1023. Historic woodland (Arnolds Wood/LWS) retained in development.
Housing		Potential to provide critical mass of housing (including affordable) to offer community infrastructure, low carbon development and sustainable transport links.
Landscape		No landscape designations on, or adjacent to, site. Site well enclosed by A12, railway line, A1023 and residential property. Landscape Capacity Study (2019) confirmed site is relatively unconstrained (high or high-medium split capacity). Site well screened with vegetation along boundaries.
Soils		Loss of agricultural land and soils of high quality but the whole district has good quality soil. Not within Minerals Safeguarding area.
Waste		Unlikely to be hazardous or large volumes of construction waste (greenfield site). Domestic waste to be sorted and recycled/disposed of in line with local process (as for adjoining residential area).

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Water		Opportunity for SUDS on site and development in areas at lowest risk of flooding. River Wid to northeastern boundary. Unlikely to be risk of mobilising contaminants during construction due to agricultural use.
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Review of the Sustainability Appraisal of the Brentwood Local Plan Proposed Submission Version Sustainability Appraisal (January 2019) - Appendix 1: Regulatory Compliance		
	Compliance	Notes
<p><i>This is not a legal review. The SA process has been reviewed against the SEA Regulations and requirements of the Planning &amp; Compulsory Purchase Act 2004 on SA. The SA Report (January 2019) has been reviewed. Reference is made to earlier stages of the SA process where relevant, notably the Draft Local Plan Interim SA (January 2018), Draft Local Plan Interim SA (February 2016), the Strategic Growth Options Interim SA (January 2015) and the Local Plan Interim Scoping Report (August 2013)</i></p>	<p><b>Key</b></p>	Meets requirements
		Improvements suggested
		Risk of challenge. Does not meet requirements
<b>SEA Regulations, Regulation 12 and Schedule 2 - Contents of Environmental Report</b>		
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.		Chapter 3 explains the scope of the Plan, what it is trying to achieve and not trying to achieve. It also sets out the legal framework. It acknowledges (Para 2.3.2) that the plan is being prepared in the context of policies and objectives established at national and local level in accordance with the Duty to Cooperate. This includes county plans, the LEP, Greater London Authority and Association of South Essex Local Authorities. It acknowledges that the plan doesn't deal with site level detailed issues that would be considered at the planning application stage.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.		Chapter 4 explains that the Plan making process started in 2009 and the purpose of this SA report is not to re-tell the whole process. Baseline information was collected at an earlier stage of the SA process. Appendix II provides the SA context and baseline review. It includes a high level summary of baseline conditions by sustainability topic which is considered to be adequate and up to date in the most part. Comments made at the Reg 18 stage were that it was unclear as to whether updated information is available for housing, employment and economy. Up to date information is not presented in this iteration of the SA Report. It would still be helpful to understand this so that the context is up to date for the plan adoption. The likely evolution of the environment without the Plan is not set out by topic in this iteration of the SA Report but as the baseline information in previous versions was thorough for the most part, this is not considered to be a deficiency.
3. The environmental characteristics of areas likely to be significantly affected		Chapter 4 acknowledges the work that has gone before at earlier stages of plan making and SA, which included baseline data collection. Appendix II provides the SA context and baseline review. It is considered adequate in the most part but some updates may be available for some topics (see above).
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.		Para 9.3.10 acknowledges that a separate HRA report has been published considering potential effects on European designated sites. It focuses on Epping Forest SAC and Essex Coast sites, noting that no likely adverse effects on integrity are predicted. It would be helpful to have a summary of the key issues within the SA Report, particularly given recent case law (People over Wind) and the recent update to NPPF paragraph 177.
5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.		The 2013 SA Scoping report provided the context for each technical topic in terms of international, national and local obligations and sustainability objectives. The Jan 2019 SA Report appraisal is structured around a set of objectives derived from these, as was the previous iteration of the SA Report at Reg 18 stage.
6. 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; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).		The assessment of cumulative effects was identified, at Regulation 18 stage, as an area that would benefit from additional focus. The appraisal methodology (para 8.3.3) states that cumulative effects are identified where appropriate, which are defined as impacts of the Plan plus other plans, programmes and projects. Box 5.5 of the January 2019 SA Report acknowledges Essex County Council's (ECC) concerns over potential impacts of proposed site allocations and cumulatively on the highway network. They required additional modelling to be undertaken before they could support the spatial strategy. The SA Report acknowledges the need to assess spatial strategy options with a redistribution of growth away from the A127 corridor/towards the A12 corridor relative to the proposed allocations. This issue concerns cumulative impacts but also influences the identification of alternatives, which is appropriate. These concerns are reflected upon in para 9.6.8, which acknowledges the importance of site-specific policy for transport and road infrastructure. Cumulative impacts are discussed further in respect of strategic site options, including Thurrock Council's views on Dunton Hills Garden Village in Box 5.7 that there are cumulative Green Belt issues (whilst not technically an environmental designation, there are linked landscape related effects). Historic England's concern over potential cumulative effects at West Horndon and Dunton, at an earlier stage of plan making are summarised in para 9.7.1 and the appraisal concludes at para 9.7.5 that the proposed submission plan would still lead to mixed effects on heritage (noting that significant negative effects were not anticipated). In relation to housing, para 9.9.8 quotes the Council's viability study which concludes that the cumulative effect of policies in the plan will not put development at serious risk. Para 9.9.10 concludes significant positive effects to meet housing need (which is the same as at Reg 18 stage). A dedicated section on cumulative effects has been added (para 9.14.4), which is a notable improvement on the previous (January 2018) iteration of the SA Report. It sets out key matters for consideration. There are various references throughout the rest of the document to cumulative impacts including such topics as air quality, traffic and landscape within the narrative of the appraisal of the Plan. The interrelationship (interaction) of effects on particular topics as required by part (m) of the requirements is not explicit in the report but they are referred to in passing throughout the appraisal, in passing (e.g. traffic, noise and emissions on residents). It would be helpful to have a summary but this is not a deficiency.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.		Comments were made at Regulation 18 stage that there was inconsistency in how mitigation measures were assumed (or not) in the appraisal of alternatives. It was also suggested that there could be fuller description of mitigation measures to be included in the Plan (through policy wording, design coding etc., requirement for detailed assessment at the project/application level. particularly for strategic sites). It is acknowledged that it is difficult to completely separate out mitigation from site characteristics only and on balance, is not considered to have flawed the site appraisal process. Improvement has been made to the consideration of mitigation in general. The January 2019 SA report discusses mitigation measures throughout the appraisal, both in reference to stakeholders' comments on the proposed broad distribution of development (e.g. box 5.4 relating to transport scenarios with and without mitigation). Comments (including from Basildon Council) included the need to plan infrastructure mitigation in a coordinated manner for best effect. The ability to mitigate potential effects has been a consideration when considering retaining or removing proposed site allocations (see para 5.3.38). Deleting an allocation was not considered reasonable. Avoiding the need to mitigate to start with (which is preferable to having to mitigate a negative impact) is a theme of the Plan and SA process. For example, it is acknowledged that growth at Brentwood would be preferable to along the A127 corridor for wastewater treatment works capacity reasons (Chapter 6 Conclusion). The opportunity to better mitigate climate change impacts is acknowledged through the decision to deliver more homes to the north of Shenfield (para 9.4.3), which would allow low carbon decentralised energy systems to be incorporated. Para 9.4.6 concludes the climate change mitigation requirements that are recommended to be included in the final Plan - particularly in relation to site specific policy for Dunton Hills Garden Village to make the most of the opportunity to minimise CO2 emissions. A development management policy framework is proposed, in respect of supporting reduced per capita CO2 emissions from both transport and the built environment. Further commentary is provided on the opportunity for a critical mass of development to provide on site infrastructure and services at para 9.5.3. Provision of more homes north of Shenfield gives rise to the opportunity to deliver a new primary school. The report states that recent work has focused on ensuring delivery of a comprehensively masteplanned scheme across the three component parts of the site to confirm delivery of the primary school, but also delivery of other elements of community infrastructure, notably diversion of Alexander Lane, creating a quiet lane for pedestrians and cyclists. The provisions for monitoring in Chapter 12 reflect the mitigation principles recommended and assuming they are adopted, will provide a mechanism for auditing the efficacy of such measures.



8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.		The SA and plan making process, starting with scoping in 2013, has been iterative and various alternatives have been considered, debated, appraised, dismissed and kept in the Plan along the way. A range of alternatives have been considered including those relating to different housing numbers, different broad distributions of development and different proposed strategic site allocations. Chapter 5 of the January 2019 presents a detailed summary of the process to date on the consideration of reasonable alternatives. It clearly sets out the high level issues and options (quantum and broad distribution), summarising consultee comments along the way, before discussing smaller site options, sub-area options before establishing the reasonable alternatives (section 5.6). The assumptions, rationale for decision-making is set out as clearly and comprehensively as could be expected for this late stage of SA in the acknowledgement that much analysis has been done at earlier stages. The reasonable alternatives are defined as a series of alternative packages of site allocations where each package would provide for the housing need in combination with completions, commitments and a windfall assumption. Paras 5.6.3 and 5.6.4 set out the reasons for narrowing down the spatial strategy options where allocations for too few or too many homes were proposed. This is reasonable. Table 5.5 sets out the reasonable spatial strategy options which cover a range of allocation options and low to high dwelling numbers (6587-8787). Chapter 6 contains the appraisal of reasonable alternatives, which is discussed further in the SA compliance section below.
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.		Section 12 sets out the Plan's commitment to monitoring. The January 2019 SA report supports the approach and comments on the Council's proposed monitoring framework in Appendix 3 of the Plan. The SA Report makes recommendations for additional monitoring measures regarding agricultural land, air pollution, biodiversity, low carbon infrastructure, specific measures for Dunton Hills Garden Village and wastewater treatment works capacity. The Plan should take note of these recommendations and the monitoring framework be updated.
10. A non-technical summary of the information provided under paragraphs 1 to 9		The non-technical summary is clear and well written, suitable for a wide audience. It summarises the key issues of note for the Plan, describes the form and methodology of the SA, acknowledging the timeline and iterative assessment and consultation.

<b>Planning &amp; Compulsory Purchase Act 2004 - Section 19 Requirements for SA</b>		
<b>Stages from Planning Practice Guidance Paragraph: 013 Reference ID: 11-013-20140306.</b>		
<b>PPG paragraph references provided below, where relevant.</b>		
<b>A Setting the context and objectives, establishing the baseline and deciding on the scope</b>		
Identifying relevant policies, plans and programmes		Chapter 2 (para 2.3.2) briefly describes the plan in the context of other national and local policies (established by, example, the LEP, county councils and Greater London Authority).
Collecting baseline information		Chapter 4 explains that the Plan making process started in 2009 and the purpose of this SA report is not to re-tell the whole process. Baseline information was collected at an earlier stage of the SA process. It is not summarised here, which would be helpful to provide context for the final appraisal. Appendix II of the previous iteration of the SA Report (January 2018) at Reg 18 stage provided the SA context and baseline review. It included a high level summary of baseline conditions by sustainability topic which was considered to be adequate and up to date in the most part. Comments made at the Reg 18 stage were that it was unclear as to whether updated information is available for housing, employment and economy. It would still be helpful to understand this so that the context is up to date for the plan adoption.
Identifying environmental and sustainability issues		This is covered by the baseline conditions at Appendix II and in Chapter 3 which sets out the scope of the SA and the framework for appraisal.
Identifying appraisal objectives		Chapter 3 sets out the scope of the SA and its key issues/objectives which form the framework for appraisal.
Consulting on the scope of the appraisal		Each iteration of the SA Report (starting with the 2013 SA Scoping Report) has been published for consultation. The Jan 2019 SA Report discusses feedback on the draft Plan from statutory consultees (e.g. cumulative effect concerns from Historic England and ECC as discussed above). It is made clear within the Jan 2019 SA Report that it is published for consultation alongside the proposed submission version of the Plan.
<b>B Developing and refining options and assessing effects</b>		
Testing the Plan objectives against appraisal objectives		Chapter 9 contains the appraisal of the proposed submission plan. It contains detailed commentary in relation to all sustainability objectives, mentioning relevant plan policies. The structure is clear, with a recap of the rationale behind each sustainability objective at the start of each section. Bold and coloured text is used to identify likely significant effects. The chapter ends with a summary of cumulative effects, which was lacking in the previous, January 2018 iteration of the SA report.
Developing and refining the alternative options for the plan Paragraph: 018 Reference ID: 11-018-20140306		See comments under SEA Requirements point 8 above.
Predicting and evaluating the significant effects of the options and alternatives		Chapter 6 includes an appraisal of the reasonable alternatives with detailed analysis in Appendix V. A conclusion is provided summarising the key points of note. In the main, the higher growth options lead to more negative effects against environmental objectives, particularly in respect of air quality and biodiversity. Strategic site options are scored well in terms of being able to deliver strategic infrastructure and mitigation measures that would not be feasible in smaller developments. Conclusions are reached on the relative benefits of alternatives with Dunton Hills Garden Village included, with the exception of landscape and air quality. Higher growth options perform better against the housing objective, as would be expected. Significant negative effects are predicted on soils for all alternatives given the high quality soil across the area. Waste water treatment works capacity is also a common constraint to growth.
Considering ways of mitigating adverse effects and maximising beneficial impacts		See comments above under SEA Regulations point 7.
Proposing measures to monitor significant effects Paragraph: 025 Reference ID: 11-025-20140306		Section 12 sets out the Plan's commitment to monitoring. The January 2019 SA report supports the approach and comments on the Council's proposed monitoring framework in Appendix 3 of the Plan. The SA Report makes recommendations for additional monitoring measures regarding agricultural land, air pollution, biodiversity, low carbon infrastructure, specific measures for Dunton Hills Garden Village and wastewater treatment works capacity. The Plan should take note of these recommendations and the monitoring framework be updated. Section 12 also explains the next steps of plan making, including the collation and review of representations before submitting the plan for Examination. The need to prepare a statement setting out the provisions for monitoring when the plan is adopted is also acknowledged.
<b>C Preparing the Sustainability Report - Including the SEA Requirements</b>		
		No major deficiencies found but there are some areas that would benefit from additional explanation, indicated by the amber shading above.
<b>D. Seek representations on the SA report from consultation bodies and the public</b>		
Paragraph: 020 Reference ID: 11-020-20140306		The January 2019 SA Report is published for consultation alongside the proposed submission version of the Local Plan.
<b>E. Post adoption reporting and monitoring</b>		
Paragraph: 025 Reference ID: 11-025-20140306	N/A	To be considered after adoption of the Plan.