

Upper Central

Spatial Regeneration Framework (SRF) Supplementary Planning Document (SPD)

Strategic Environmental Assessment (SEA) Environmental Report

June 2019

for **Avison Young** on behalf of



Liverpool
City Council

by

enfusion



Liverpool Local Plan

Upper Central

Spatial Regeneration Framework
Supplementary Planning Document (SPD)

Strategic Environmental Assessment (SEA) Environmental Report

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1.0 INTRODUCTION

Strategic Environmental Assessment (SEA)

- 1.1 Strategic Environmental Assessment (SEA) is a European Union (EU) requirement that seeks to provide a high level of protection of the environment and to contribute to promoting sustainable development by integrating environmental considerations into the process of preparing certain plans and programmes. The EU Directive is implemented in the UK through the SEA Regulations (2004)¹. Where the Directive applies there are some specific requirements that must be complied with and, in the case of Local Plans, SEA should be addressed as an integral part of the Sustainability Appraisal (SA) process.
- 1.2 SA and SEA are tools to inform plan-making and are used to assess the likely effects of a plan when judged against reasonable alternatives. An SA of the proposals in a Local Plan is required by section 19 of the Planning & Compulsory Purchase Act (2004)² and as set out in paragraph 32 of the National Planning Policy Framework (NPPF, revised 2018). Government guidance³ advises that the SA should incorporate the requirements of the SEA Regulations with socio-economic factors being considered in the same way as environmental factors. It may be noted that an Environmental Impact Assessment (EIA) is applied to individual projects that are likely to have significant environmental effects and in accordance with the EIA Regulations (2011)⁴.
- 1.3 SA/SEA is an iterative and ongoing process that informs the preparation of draft planning documents. Likely significant effects are identified and assessed for the emerging elements of the draft plan and judged against reasonable alternatives. Mitigation measures are suggested for any significant negative effects identified. The role of SA/SEA is to inform the Council as the planning authority; the SA/SEA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility, and feedback comments from consultation.
- 1.4 There is a tiering of appraisal/assessment processes that aligns with the hierarchy of plans – from international, national and through to local. This tiering is acknowledged by the NPPF (2018) in paragraph 35 that states that evidence should be proportionate; and further supported by planning guidance⁵ that advises the SA and SEA should be proportionate and relevant to the plan being assessed. The findings of the SEA process can help set the scope for the lower tier project level EIA process.

¹ <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

² <http://www.legislation.gov.uk/ukpga/2004/5/section/19>

³ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#sustainability-appraisal-requirements-for-local-plans>

⁴ <http://www.legislation.gov.uk/uksi/2011/1824/contents/made>

⁵ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#sustainability-appraisal-requirements-for-local-plans>

- 1.5 Supplementary Planning Documents (SPDs) are only prepared where necessary as they build upon policies in the Local Plan in order to provide more details or further guidance. It is only in exceptional circumstances that an SEA may be required when producing a SPD – if it is likely to have significant environmental effects that have not already been assessed during the preparation of the Local Plan⁶.

The Local Plan for Liverpool

- 1.6 **The Liverpool Unitary Development Plan (UDP)** was adopted in November 2002 and under the new planning system (NPPF 2012, revised 2018) is a Local Plan Document with saved policies. The UDP is gradually being replaced by the new Local Plan⁷ for Liverpool that will set strategic objectives and details to guide and manage development over the next 15-20 years. The spatial regeneration framework area for the Upper Central SPD is identified under saved UDP Policy⁸ that primarily designates the City Centre area for mixed use development. The key relevant UDP policies are as follows:
- 1.7 Strategic Policies support the identification of regeneration areas, including the City Centre and its surrounding areas – Policy GEN1. Strategic Policies also seek to preserve and improve heritage and the built environment (Policy GEN3); improve sustainable transport cycle and pedestrian movement (Policy GEN6); and protect and enhance Liverpool’s environment (Policy GEN8).
- 1.8 Policy E6 Sites for Various Types of Development & Mixed-Use Areas: relates to a number of areas including the City Centre, as shown on the Proposal Map, as suitable for mixed development. The Policy asserts that the area between the Liverpool University campus, older hospital complex and the cathedrals provide potential locations educational, medical, residential, and Class B1 uses.
- 1.9 Other UDP Policies are relevant, including HD18 on general design requirements, T6-T15 on transport, HD1-14 on heritage and design in the built environment, OE11-12 & OE14-15 on green spaces and environmental improvements, and S1 City Centre Retail Development.
- 1.10 **The new Liverpool Local Plan⁹** aims to guide and manage development for the next 15 – 20 years and, once adopted, it will replace the adopted UDP. In response to Government changes to planning, in February 2013 the City Council resolved to prepare a single Local Plan, rather than the Core Strategy with various development plan documents that it had been preparing. However, the developing draft Core Strategy had been through several preparatory stages including consultation during 2006 to 2012 (please note

⁶ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁷ <https://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/plan-making-in-liverpool/current-local-plan-documents/local-plan/>

⁸ <http://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/plan-making-in-liverpool/current-local-plan-documents/unitary-development-plan/>

⁹ <http://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/plan-making-in-liverpool/current-local-plan-documents/local-plan/>

Table 1.1 following). In taking the Core Strategy forward as part of the new Local Plan, the City Council has recognised the changes since the key objectives had been formulated but also been able to build upon the previous work.

- 1.11 The new Local Plan will provide a long-term spatial vision, strategic priorities and policies for future development with regard to the quantity and location of new homes, employment provision, shops, facilities & other services, transport & other infrastructure provision, climate change mitigation & adaptation, and the conservation & enhancement of the natural and historic environment. It will set out development management policies that will guide delivery of development, and site allocations for residential, employment, retail and other land uses – as shown on a Proposal Map. It will also set out designations where land is safeguarded or where specific policies apply. The Local Plan will be supported by an Infrastructure Delivery Plan (IDP).
- 1.12 The initial draft of the Local Plan was subject to statutory (Regulation 18) and public consultation in 2014. Comments received were considered and the draft Liverpool Local Plan (September 2016) was published for public consultation during 16 September – 11 November 2016. The draft Liverpool Plan 2013-2033 was submitted for independent examination¹⁰ in May 2018. The Council has been undertaking some further studies to update evidence for strategic housing and viability. This information was subject to public consultation between 8 October and 19 November 2018 and the examination hearings will commence sometime after this.
- 1.13 The submitted draft Plan (May 2018) comprises the following:
- The Spatial Portrait of Liverpool with the Vision & Strategic Priorities
 - Strategic Policies to deliver the Vision & Strategic Priorities
 - Liverpool City Centre
 - Employment Land & the Economy
 - Housing Provision
 - Shopping Centres & community Facilities
 - Chapters 10-14 on Urban Design; Heritage; Green Infrastructure; Environmental Resources; and Sustainable Transport & Accessibility
- 1.14 The Spatial Portrait recognises the role of the City Centre as a key driver in the revitalisation of the City Region. Policy STP1 sets out the spatial priorities for the sustainable growth of Liverpool, including focusing economic development in key areas such as the Knowledge Quarter. Chapter 6 of the draft Plan identifies eight Character Areas within the City Centre, each with distinct roles and functions. These areas are broadly based on those identified in the City Centre Strategic Investment Framework (SIF 2011 & updated 2016) and includes the Knowledge Quarter. Policy CC3 The Knowledge Quarter sets out the requirements and guidance for new development and includes identification of the KQ Gateway Area (now referred to as Upper Central) –

¹⁰ <https://liverpool.gov.uk/localplanexamination>

bounded by Mount Pleasant, Brownlow Hill, Lime Street and Renshaw Street – recognising that some key projects have been completed in the KQ area whilst the KQ Gateway (Upper Central) represents further phases for growth.

- 1.15 At each stage of plan preparation and consultation, an accompanying SA/SEA is also published; comments received are taken into account and considered at the next stage of plan-making and assessment. The stages of the draft Liverpool Local Plan preparation and accompanying SA/SEA reports, together with formal and public consultation periods, are summarised in the following table:

Table 1.1: Chronology of Local Plan Preparation, Accompanying SA/SEA & Consultation

Local Plan Document Consultation	SA/SEA Document Consultation
Core Strategy Issues & Options (2006); Preferred Options (2008); Revised (2010); Submission Draft (2012)	Core Strategy Revised Preferred Options SA Report (February 2010) ¹¹
Draft Local Plan Initial Regulation 18 Consultation 2014	SA Scoping Report (February 2014)
Draft Local Plan Consultation 16 September – 11 November 2016	SA Report (September 2016) ¹² Consultation 16 September – 11 November 2016
Draft Local Plan (November 2017) Regulation 19 Public consultation 2018	SA Report (January 2018) Public consultation 2018
Submission Local Plan Submitted May 2018	SA Report (January 2018)
Additional evidence – new SHLAA & Viability Assessment Consultation 8 October – 19 November 2018	
Independent Examination Ongoing	
Adoption	SA Adoption Statement

- 1.16 Thus, the emerging drafts of the Local Plan have been tested and informed by SA/SEA relevant to the stage of plan-making at the time. The original intention for this major redevelopment area - the Upper Central SRF - is grounded in Policy E6 of the adopted UDP. In the new draft Local Plan

¹¹ <http://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/plan-making-in-liverpool/evidence-monitoring-and-information/evidence-and-information/>

¹² http://consult.liverpool.gov.uk/portal/draft_liverpool_local_plan?tab=files

(submitted May 2018), Policy CC3 sets out the requirements and guidance for new development proposed for the KQ area as shown on the Proposals Map. CC3 (3b) includes development of the Upper Central area bounded by Mount Pleasant, Brownlow Hill, Lime Street and Renshaw Street. The Policy also requires consideration of the World Heritage Site (WHS) Buffer Zone. Other emerging Policies are relevant, including those relating to design, transport, heritage, green infrastructure, and environmental resources.

- 1.17 Emerging Policies, including CC3 KQ Liverpool, have been subject to SA/SEA and consultation such that the wider context and justification for development regeneration, as well as the site-specific area of Upper Central, has been tested through SA/SEA. Whilst the draft Plan and its accompanying SA/SEA¹³ does carry some considerable weight, it has not been subject to independent examination such that it might be subject to changes before it is found sound and adopted.

The Upper Central Spatial Regeneration Framework (SRF) SPD

- 1.18 The Council is preparing the Upper Central Spatial Regeneration Framework as a Supplementary Planning Document (SPD) that will then comprise part of the Local Development Framework of planning documents. The SPD will need to be in conformity with the higher-level adopted Liverpool UDP and the emerging new Local Plan. The SRF SPD¹⁴ is being prepared by a team lead by Avison Young, K2 Architects and Planit-IE on behalf of, and in partnership with, Liverpool City Council.
- 1.19 The partnership vision¹⁵ for Upper Central is that it will be transformed into a vibrant part of the city with new shops, offices, galleries, bars, restaurants, gyms and university space. A key component of Upper Central will be the new commercial space for tech and digital businesses, alongside futuristic educational space. The regeneration of Upper Central is already underway with the Ion scheme on Lime Street and Liverpool John Moores University's demolition of the former sorting office on Copperas Hill, will be a catalyst for much needed investment and will create a new green environment between the wider Knowledge Quarter area and the rest of the City Centre.
- 1.20 The location of the Upper Central SRF area is shown in the figure as follows:

¹³ LUC for Liverpool City Council (January 2018) available at: <http://www.hwa.uk.com/site/wp-content/uploads/2018/05/SA-incl-EqIA-HIA-of-the-Submission-Draft-Liverpool-Local-Plan-SD8.pdf>

¹⁴ <https://www.howplanning.com/latest-news/2018/7/12/super-team-to-shape-gateway-masterplan>

¹⁵ <http://www.kqliverpool.co.uk/spaces/kq-gateway/>

Figure 1.2: Location of the Upper Central SRF Area¹⁶



- 1.21 The Upper Central area covers around 56 acres at the heart of Liverpool City Centre and it is a fulcrum point for activities with regard to transport, commerce and leisure; it could also be a key economic driver and connector from this part of the City to neighbouring zones where masterplans and strategies are being implemented. Upper Central also lies within the WHS Buffer Zone. The area represents a gateway between the heart of the City and links with other districts such as St Georges Quarter, the newly designated Fabric District to the north, the Main Retail Area and Ropewalks. Lime Street Station sits as the centre of the zone with stunning architecture opposite and the north; however, for decades Lime Street has had an air of neglect with vacant buildings.
- 1.22 Upper Central has the capacity to see new education and academic uses, digital, tech and biotechnical facilities, alongside some limited key worker and student residential accommodation, hotels, and an improved commercial and leisure offer. The SRF Brief to consultants further advised that

¹⁶ Liverpool Council Brief for Consultants (2018) The Knowledge Quarter Gateway Spatial Regeneration Framework

consideration of prospective new developments should embrace 'Innovation' by providing cutting-edge style architectural design and invention, smart technology and sustainability to act as an exemplar area for renewable energy and environmentally sustainable design and construction.

- 1.23 The SRF comprises six distinct **Character Areas**, each with its own unique features, characteristics and development opportunities, as follows:
- Ranelagh Place: the heart of the framework characterised by the grand architecture of the listed Adelphi Hotel and the former Lewis's department store; pivotal to the SRF as it connects the City Centre with the other character areas.
 - Lime Street Threshold: located adjacent to Liverpool Lime Street station and thus prominent for arrivals by train; characterised predominantly by retail with the St Johns Shopping Centre and the new Lime Street development by ION.
 - Copperas Hill: comprises the area to the east and rear of the railway station. The former Royal Mail building is undergoing renewal through the development of a new student life building and sports building by Liverpool John Moores University, and the area is being transformed into a student community.
 - Mount Pleasant: comprises the land between two vehicular route links that lead down from the Knowledge Quarter to the City Centre; represents an opportunity to create landmark new developments.
 - Renshaw Street: relates to this street and its buildings – one of the busiest streets in the city with little provision for pedestrians or sustainable transport.
 - Ropewalks/Bold Street: includes Central Station with plans for major upgrading; also encompasses part of the Main Retail Area, the independent retail scene with stores, cafes, restaurants alongside cultural institutions. Predominantly used by pedestrians and landmarked by the infamous St Luke's Church.
- 1.24 The SRF sets out the Vision and overall Masterplan, comprising key principles for each character Area, to guide the future development of the UPPER CENTRAL area over the next 15-20 years. The SRF has been prepared in consideration of existing and emerging planning policies. It has been developed with full regard to the characteristics of the area, the overarching themes, and ongoing consultation with key stakeholders. When adopted, the SPD provides a set of development principles and design guidance against which future planning applications, investment decisions, and development options can be decided.
- 1.25 The SRF comprises the Spatial Development Framework that encompasses overarching Masterplan Principles with 7 Themes that underpin more detailed site wide frameworks for the public realm and built form that have been identified as imperative to the re-creation and re-imagination of the SRF area, acting as catalysts for further regeneration. A set of Character Area Principles is then provided for each of the 6 Character Areas – these should be used to guide future development and against which planning applications can be

assessed. Development Proformas are provided for further guidance on specific sites.

- 1.26 The final section of the SRF deals with delivery and phasing, including suggestions for appropriate developer contributions, early collaboration with stakeholders to facilitate implementation, and an approach to monitoring and formal review, when appropriate.
- 1.27 It may also be noted that there are several other SPDs that provide more detail, and which are likely to be material in determining applications in the Upper Central area. The SRF makes it clear that these other SPDs should be taken into consideration:
 - World Heritage SPD¹⁷ (adopted 2009)
 - Ensuring a Choice of Travel SPD¹⁸ (adopted 2008)
 - Design for Access for All SPD

The World Heritage and Choice of Travel SPDs were subject to SA incorporating SEA during their preparation.

SEA Screening & Scoping

- 1.28 There is no requirement for SPDs to be subject to SA, but they may, in exceptional circumstances, require an SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the Local Plan. Before deciding whether significant environmental effects are likely, the local planning authority should take into account the criteria specified in schedule 1 of the SEA Regulations and consult with the consultation bodies (in England – Environment Agency, Historic England & Natural England).
- 1.29 As the new Local Plan is still at a draft stage – submission with examination ongoing - the City Council undertook an SEA screening assessment¹⁹ for the Upper Central SRF SPD. This was carried out by SA/SEA specialists Enfusion Ltd for Avison Young (formally GVA HOW Planning) on behalf of the Council. The SEA screening concluded the following:
 - The characteristics of the plan do set a framework for projects and other activities; and it is relevant for integrating environmental consideration to promote sustainable development. The Upper Central SPD is grounded in policy in the adopted UDP and the emerging policies of the new Local Plan, that have been subject to SA/SEA. However, the new plan and its supporting SA/SEA have not yet been independently examined.
 - The SRF SPD is not relevant as a plan for implementing Community legislation as this is undertaken by the higher-level plan – the Liverpool Local Plan; the plan does not influence other plans in the development

¹⁷ <http://liverpool.gov.uk/media/9644/world-heritage-site-spd.pdf>

¹⁸ <http://liverpool.gov.uk/media/9638/ensuring-a-choice-of-travel-spd.pdf>

¹⁹ Enfusion for GVA HOW Planning on behalf of Liverpool City Council (September 2018) KQG SPD SEA Screening & Scoping Report

planning hierarchy – but it does influence project level assessments and activities.

- The SRF SPD is likely to have significant effects on human health, material assets, cultural heritage, landscape/townscape, and possibly biodiversity, flora and fauna. Therefore, an SEA is required due to the spatial extent of the likely effects and the value and vulnerability of the area affected.

1.30 The SEA screening decision considered that the Upper Central SRF (proposed Supplementary Planning Document) is likely to have significant environmental effects and thus does require a Strategic Environmental Assessment (SEA) for the following reasons:

1. Likely significant effects have been previously assessed through SA incorporating SEA for the emerging new Liverpool City Local Plan (submitted May 2018) but the plan and its supporting SA/SEA have not yet been independently examined nor yet been found sound and adopted.
2. Thus, there are likely significant effects on the environment that have not been previously assessed through SEA.

1.31 However, the draft Local Plan - and its accompanying SA/SEA - is at a stage of development such that it does carry some weight in plan-making and associated assessment processes, and therefore, a pragmatic approach was proposed for the SEA of the Upper Central SRF SPD. This is also in recognition of the level of plan-making and the level of assessment processes – it is not necessary to duplicate any subsequent project level Environmental Impact Assessment (EIA). The SEA Screening & Scoping Report (September 2018) also included a proposed scope and method for the SEA of the Upper Central SRF SPD that builds upon the SA/SEA work already undertaken by the Council for the emerging new Local Plan.

Consultation

1.32 The emerging drafts of the new Local Plan and its SA/SEA have been subject to statutory and wider public consultation as previously described in paragraphs 1.10-1.17 and as shown in Table 1.1. Comments received have been taken into account in the next stage of plan-making and assessment. Consultation is an important stage in both processes and comments received will continue to be considered in an iterative and ongoing way.

1.33 The draft Upper Central SRF SPD has been prepared with both formal and informal consultation, including significant consultation on guiding ideologies and initial concepts that informed the development of the overarching Masterplan Principles. The Council is seeking to consult further on the Upper Central SRF later in July 2019. After consideration of any representations, it is anticipated that the SPD could be adopted later in 2019.

1.34 The Upper Central SRF SPD Screening & Scoping Report was sent to the environmental bodies – Environment Agency, Historic England & Natural England – in accordance with statutory requirements for a 5 weeks period.

- 1.35 This Environmental Report is being sent to the environmental bodies and also made available on the Council's website for 5 weeks to accompany the draft SRF on public consultation. Any comments received on the SEA will be considered when finalising the SRF SPD and will also be reported in the final SEA Adoption Statement that will accompany the SPD on adoption in due course.

This Environmental Report

- 1.36 This SEA has been carried out in consideration of extant Government guidance²⁰, good practice and pragmatism, taking into account proportionality - the status of the SPD within the Local Plan hierarchy of documents and the tiering of assessment processes. This SEA has been undertaken in accordance with requirements of the SEA Regulations and this Environmental Report is considered to be part of the wider SA/SEA process for the emerging new Local Plan and associated documents.
- 1.37 Following this introductory section, the approach and methods used is outlined in Section 2, including the consideration of alternatives. The environmental characterisation is outlined in Section 3. The findings of the assessment are presented and discussed in Section 4. Monitoring proposals are indicated in Section 5, together with a summary conclusion and next steps. Appendix I signposts how the requirements of the SEA Regulations have been met and in accordance with government guidance²¹.

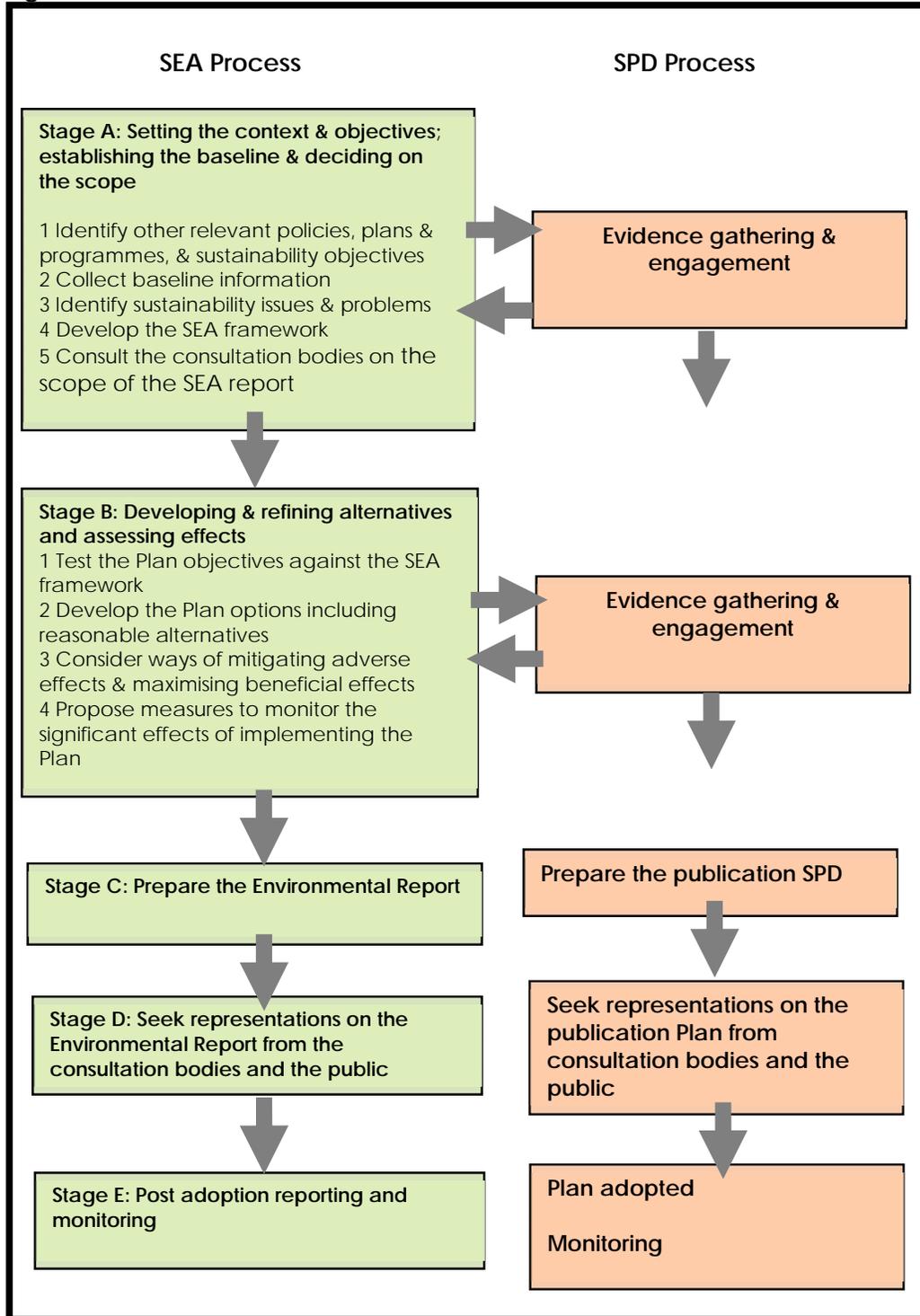
²⁰ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#sustainability-appraisal-requirements-for-local-plans>

²¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/580073/Strategic_Environmental_Assessment_Regulations_requirements_checklist.pdf

2.0 METHODS

Introduction and the SEA Process

Figure 2.1: SEA & SPD Processes



- 2.1 National Planning Practice Guidance²² sets out the key stages and tasks for the SA (incorporating SEA) process and their relationship with the Local Plan process. The above diagram sets out the SEA stages and tasks as they are applicable to the SPD preparation process and shows how the two processes interact.
- 2.2 The first stage (A) of the SEA process must identify the scope and level of detail of the information to be included in the Environmental Report. It sets out the context, objectives and approach of the assessment; and identifies relevant environmental issues and objectives. Stage B of the SEA process comprises the assessment of effects, including of any reasonable alternatives to the proposals in the draft plan; ways of mitigating adverse effects and maximising beneficial effects are considered, and monitoring measures proposed. Stage C of the SEA process includes the preparation of the Environmental Report that must include certain information. Stage D considers representations made on the Environmental Report from the consultation bodies and the public. After examination and adoption of the plan, SEA Stage E includes the preparation of the post-adoption statement and considers monitoring.
- 2.3 Consultation on the proposed scope of the SEA is required with the statutory bodies; wider public consultation is required for the draft SRF SPD and accompanying Environmental Report. It is important to note that SEA is an iterative and on-going process. Government advises a pragmatic approach to SA/SEA for plan-making and suggests that the evidence base can be used for both processes. This Environmental Report (November 2018) is Stage C in the SEA process.

Scoping & the SEA Framework

- 2.4 The SA/SEA Scoping Report²³ for the new Local Plan was published for statutory and public consultation in early 2014. Comments received were taken into account and this then completes Stage A of the SA/SEA process, setting the scope for the assessment of Local Plan documents, including a SA/SEA Framework of Objectives and significance criteria that form the basis for assessment against the baseline conditions and character of the area.
- 2.5 The SEA of the draft SPD used the SA/SEA Framework of Objectives (Table 2.1 SA Report, January 2018) that has been applied throughout to the emerging Local Plan documents. The SEA Framework of Objectives for the SPD considers only those SA Objectives that are relevant to an SEA and for environmental topics as listed in Schedule 2 (6) Regulation 12(3) of the SEA Regulations; the SEA Framework is set out below in Table 2.1:

²² www.planningguidance.communities.gov.uk

²³ <http://liverpool.gov.uk/media/9590/local-plan-sa-scoping-feb-2014.pdf>

Table 2.1: SEA Framework

No. SEA Objective	Assessment Criteria Will the policy...
1. To use natural resources prudently and efficiently, and increase energy generated from low carbon sources	Reuse vacant/derelict building or a vacant/overgrown space Encourage higher density development in highly accessible locations Maximise energy and water efficiency in design and construction of new development Increase energy generated from local and renewable sources
2. To reduce all types of flood risk and encourage effective water management	Protect and enhance green infrastructure Direct development to areas of lowest risk of flooding Maximise use of Sustainable Urban Drainage Systems
3. To minimise the production of waste and increase reuse, recycling and recovery rates	Minimise the production of waste Support recycling and composting
4. To protect and improve water, air and soil quality	Reduce the emissions of greenhouse gases and other pollutants Prevent pollution of water Protect water quality Improve air quality Protect residential amenity from noise Assist with reclamation of contaminated land
5. To preserve, enhance and manage the city's rich diversity of cultural, historic and archaeological buildings, areas, sites and features and their settings	Protect and enhanced the character of the City's heritage assets Protect the integrity of, and assist the management of the World Heritage Site Promote high quality design and enhance the public realm
6. To protect, enhance and manage the City's green infrastructure resource to maximise benefits for health, biodiversity, climate change and economic growth	Protect and enhance green infrastructure Enhance environmental quality
7. To protect, enhance and manage biodiversity, the viability of endangered species, habitats and sites of geological importance	Protect and enhance designated habitat sites and other natural environmental assets
8. To maintain and enhance the quality of landscapes and townscapes, and achieve a quality urban design which enhances the local character	Protect and enhance the character of the City's heritage assets Encourage a good relation to existing development and a quality public realm Improve accessibility Improve safety and perceptions of safety
9. To reduce the need to travel by car and improve choice and use of sustainable transport modes	Ensure high trip generating uses are in locations accessible by a range of public transport modes Direct shops, services and facilities that meet day to day needs to the network of centres as these are in close proximity to local communities

10. To provide a mix of good quality, affordable and resource efficient housing	Support the creation of successful housing markets Provide housing to meet local needs, including vulnerable and disadvantaged people Assist the creation of mixed communities – type, tenure, affordability Include a requirement for a specific percentage of affordable housing
11. To improve health and reduce health inequalities (including mental health)	Protect and enhance green infrastructure Prevent pollution of water Improve air quality Protect residential amenity from noise Direct shops, services and facilities that meet day to day needs to the network of centres as these are in close proximity to local communities Promote physical activity
12. To reduce poverty and social deprivation and secure economic inclusion	Reduce the need to travel Direct shops, services and facilities that meet day to day needs to the network of centres as these are in close proximity to local communities Provide local employment opportunities in employment deprived locations
13. To give everyone access to learning, training skills and knowledge	Direct educational and training facilities to accessible locations
14. To provide for future economic growth, support new and existing businesses, and maintain high and stable levels of employment	Protect a supply of sites and buildings for employment Support the growth of new and existing businesses, especially in the growth sectors Help attract inward investment
15. To enhance the vitality and viability of city, district and local centres	Enhance environmental quality Direct shops, services and facilities that meet day to day needs to the network of centres as these are in close proximity to local communities

2.6 The SEA Regulations (12 (3)) require consideration of the objectives of other relevant Plans and Programmes (PP) during the SA/SEA scoping stage. The PP Review was undertaken and reported for the SA Scoping in 2014 and this was updated and informed the higher-level SA/SEA published in September 2011 (Appendix 1); overall, the other plans/programmes objectives considered remain relevant to the SEA of the SPD.

2.7 The SEA Regulations also require that the likely significant effects on the relevant aspects of the environment should be assessed and reported. The characteristics of the plan area should be described, including the likely evolution without the plan. Government advises a pragmatic approach to the collation, analysis and reporting of this baseline information - and much of it is shared between the plan-making and SA/SEA processes. The baseline characteristics were identified, and consulted upon, in the SA/SEA scoping 2014. Issues for sustainable development were identified and contributed to the preparation of the SA Framework of Objectives.

Assessing the Upper Central Spatial Regeneration Framework SPD

- 2.8 As explained above, this SEA is part of an assessment tier that correlates with the hierarchy of plan-making and, in line with Government guidance, is proportionate to the stage of plan-making and assessment. It should also be remembered that at subsequent levels of plan-making, there are the Environmental Impact Assessment (EIA) Regulations (amended 2015) that require assessment of development proposals above certain thresholds. The SPD must be in conformity with the higher level Local Plan that has been subject to detailed SA/SEA.
- 2.9 Accordingly, the same SEA Framework was used to structure the assessment of the SPD and to demonstrate conformity with the previous higher level SA/SEAs. The assessment used the information from Defra Magic maps, the Environment Agency, Natural England, SA/SEA baseline information (2014, 2016 & 2018) and any relevant Local Plan evidence, and including the local evidence supporting the SPD. This formed the basis for testing the draft SPD against the SEA Objectives, together with professional judgment in the absence of any relevant information, particularly with regard to cumulative effects.
- 2.10 In compliance with the SEA Regulations, the assessment considered the likely significant effects, including short, medium and long term, permanent, and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported. The assessment recognised 6 levels of significance in the same way as the earlier SA/SEAs of the higher-level planning documents and as shown in the following diagram:

Table 2.2: Categories of Significance

Categories of Significance		
Symbol	Meaning	Sustainability Effect
--	Major Negative	Problematical because of known sustainability issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect

- 2.11 The SEA considered the likely significant effects of the implementation of the Upper Central SRF SPD on the sustainability objectives for the Liverpool City Local Plan area. Relevant SEA Objectives were grouped by themes so that the assessment could focus on the key aspects. Many of the issues and

aspects of the draft SRF SPD are inter-related and the assessment sought to focus on the key matters, avoid duplication, and retain the readability of the report. For each environmental theme, the relevant SEA Objectives are recorded, and a narrative provided describing any significant effects identified, the potential for mitigation of any significant adverse effects, and any suggestions for enhancing beneficial effects.

Consideration of Alternatives

- 2.12 The EU SEA Directive requires assessment of the likely significant effects of implementing the plan and "*reasonable alternatives*" taking into account "*the objectives and geographical scope*" of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term "*reasonable alternative*"; however, UK SA/SEA guidance²⁴ advises that it should be taken to mean "*realistic and relevant*" i.e. deliverable and within the timescale of the plan. This is confirmed by the NPPF (paragraph 31) that requires that evidence in plan-making should be adequate and proportionate.
- 2.13 The Upper Central SRF SPD is limited in its geographical scope (the Upper Central area and adjoining areas in Liverpool City) and its sphere of influence aligned with its purpose - to provide developers, their agents and design teams with a framework of advice that will support compliance with requirements for regeneration development in the City. At this stage, no other reasonable alternatives were identified. In accordance with the SEA Regulations, the assessment did consider the implications of the do-nothing scenario if there was no Upper Central SPD – and this is reported in the following Section 3 that discusses the baseline characterisation for the area.
- 2.14 In consideration of the purpose, objectives and sphere of influence of the SPD and its place in the local plan and SA/SEA hierarchies, there were no other reasonable alternatives possible that required testing through the SEA process at this stage.

²⁴ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

3.0 ENVIRONMENTAL CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

Introduction

- 3.1 The SEA Regulations suggest a number of environmental factors that may be considered with regard to assessment of likely significant effects (Regulation 12(3) Schedule 2 Information for Environmental Reports). This Schedule also suggests that the inter-relationships between such factors or issues should be considered and reported. As many environmental factors are inter-related, the environmental characteristics are summarised for this Environmental Report within Themes that also correlate with the SA/SEA Framework used for appraising the emerging new Local Plan. The baseline conditions relevant to the Upper Central SRF for each theme are described and the likely evolution without the Local Plan and SPD are outlined. In accordance with the SEA Regulations, the key environmental issues, problems and opportunities are also outlined.

Biodiversity & Green Infrastructure

- 3.2 There are no internationally, nationally or locally designated biodiversity sites within the Upper Central area, and no Priority Habitats present. The nearest European/internationally designated sites to the Upper Central area are approximately 2km to the west²⁵ - the Mersey Narrows and North Wirral Foreshore Ramsar site and Special Protection Area (SPA). Ramsar and SPA sites are also located approximately 5km to the south - the Mersey Estuary SPA - and over 5km to the north - the Liverpool Bay SPA²⁶. There is also a proposed extension to the Liverpool Bay/Bae Lerpwl pSPA into the River Mersey. Nationally important Special Sites of Scientific Interest (SSSIs) are also designated at the Ramsar and SPA sites; however, the Upper Central area is outside the SSSI Impact Risk Zones. The nearest Local Nature Reserves are over 10km to the east and north-east²⁷.
- 3.3 The land currently comprises a mixture of uses, mostly commercial, retail and leisure, and with two key transport centres: Lime Street Station and Central Station. The SA Report (Section 3, January 2018) of the emerging new Local Plan recognises that open/green space and habitat patches are somewhat isolated and fragmented throughout the City and indicates that there is a key issue to improve the open space and biodiversity resource generally. The Liverpool Green Infrastructure (GI) Strategy (2010) concluded that low levels of GI correlate with areas of poor mental health and poor air quality; it noted that the City Centre has low levels of green infrastructure and that which is present has low functionality²⁸. The GI Action Plan includes 5 priorities of which the fifth is cross-cutting and relates to development design. Liverpool City

²⁵ Defra Magic Map - accessed online (November 2018)

²⁶ Ibid

²⁷ Ibid

²⁸ <http://www.greeninfrastructurenw.co.uk/liverpool/>

Region Ecological Network²⁹ comprises an evidence base and aims to reduce the loss and/or fragmentation of important habitats.

- 3.4 Without the Local Plan and the Upper Central SPD, the loss and fragmentation of habitats and open/green spaces is likely to continue with likely major negative effects in the longer term on biodiversity, ecosystem functioning, and human health.

Communities & Accessibility; Human Health

- 3.5 Recent estimates suggest that the population of Liverpool is increasing, and it is a young population reflecting the popularity of the City among students and young professionals³⁰. The scale of deprivation in parts of the City manifests itself in social factors including significant health inequalities. Liverpool is one of the most deprived local authorities in England with the level of deprivation highest in the north of the City. Whilst there has been an improvement in the condition of dwellings since 2006, development activity declined significantly following the recession but with some signs of recovery in the housing market in recent years.
- 3.6 Generally, most district and local centres have deteriorated over time. The City Centre is fundamental to the economic growth of the City Region and over recent years has had a major transformation with the completion of development projects such as Liverpool One, the arena and conference centre at Kings Waterfront, and the Museum and mixed-use scheme at Mann Island. The regeneration of Upper Central is already underway with the Ion scheme³¹ on Lime Street and Liverpool John Moores University's demolition of the former sorting office on Copperas Hill. Liverpool is well supplied by rail and bus services and links to the transport network; as a City, it is also well-placed to promote more sustainable transport modes including walking and cycling.
- 3.7 The studies for the preparation of the SRF identified the need for significant improvement in key elements of the area – uses, aesthetics, connections – all of which affect communities with the provision and access to services and facilities, and people's health and well-being. There are vacant sites, a lack of connectivity, absence of quality public spaces, lack of sustainable transport, and a low-quality atmosphere. Road traffic data indicates several clusters of accidents within the area for collisions with pedestrians and cyclists.
- 3.8 Without the Local Plan and the Upper Central SPD, there will be no support for coordinated encouragement and support for the creation/renewal of sustainable communities, including high-quality environments with sustainable transport that will promote health and well-being. Without the Plan and the SPD, there will be no management or planning for location of employment and residential development in the right place and the right time, nor adequate protection of employment land from other uses; there will be

²⁹ <http://www.lcreconet.uk/>

³⁰ Liverpool Local Plan SA Report (September 2016 & January 2018)

³¹ <http://iondevelopments.co.uk/projects/liverpool-lime-street/>

throughout the City, as well as important archaeological remains⁴¹. Drawing upon the architectural and cultural heritage, the tourism, leisure and cultural industries are a vital part of Liverpool's economy.

- 3.15 The World Heritage SPD⁴² was adopted by the Council in October 2009 to provide guidance for protecting and enhancing the WHS, whilst encouraging investment and development to help secure a healthy economy and support regeneration. The Upper Central area is located within the WHS Buffer Zone of the World Heritage Site. Section 4 of the WHS SPD sets out general guidance for development in the WHS and the surrounding Buffer Zone. The guidance seeks to ensure that any new development in these areas is designed to a high standard, is accessible to all and reflects the historic character of the surrounding area. The SPD provides specific guidance in relation to proposals for Tall Buildings, stating that there will be a strong presumption against high-rise developments within the World Heritage Site.
- 3.16 The SRF area also contains and is located adjacent to numerous Listed Buildings, including the Grade II Lime Street Station - many of these reflect the history of the area. The framework area is adjacent to/surrounded by a number of Conservation Areas - Duke Street, Mount Pleasant and William Brown Street⁴³.
- 3.17 Without the Plan and the Upper Central SPD, there will be limited coordinated direction or management of development to ensure that the important cultural heritage assets are protected and enhanced within the framework area, nor will the requirements for the World Heritage Sites designation and management be supported.

Landscape & Urban Quality

- 3.18 The heritage assets contribute to the distinctive urban landscape which further significantly contributes to the special identity for the City⁴⁴. Liverpool is within the Merseyside Conurbation Character Area (NE505)⁴⁵ that recognises the diverse historic and cultural centre, together with the large area of industrial land use, associated commercial land, interlinked by an extensive transport structure.
- 3.19 The Upper Central area is in an urban setting with a townscape that has been influenced by the cultural, entertainment and recreational heritage of the area. The area has been a magnet for entertainment and recreation since the 18th century pleasure gardens, the opening of the Adelphi Hotel, and the proximity of Lime Street station as the main entry to the city. It is classified as being in the City Centre Character Area and the current varied character reflects the main routes into the centre. Ranelagh Place contains a concentration of the tallest structures in this part of the city. Character and

⁴¹ Liverpool Local Plan SA Report (September 2016)

⁴² <http://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/plan-making-in-liverpool/current-local-plan-documents/world-heritage-site-spd/>

⁴³ <http://liverpool.gov.uk/media/8587/conservation-areas-whole-city-29-04-2014-a0.pdf>

⁴⁴ Liverpool Local Plan SA Report (September 2016)

⁴⁵ <http://publications.naturalengland.org.uk/publication/5835259841085440>

urban quality vary with grand architecture, degraded townscape areas, lack of cohesivity and a domination by traffic infrastructure, although there is some renewal with construction of the new hotel and student accommodation. The area contains a mix of uses including retail, leisure and professional and is characterised by key landmark buildings and emerging educational facilities.

- 3.20 Without the Plan and SPD, there will be no direction or management of development and no coordinated approach to regeneration and re-use/redevelopment of disused buildings and sites such that the landscape and urban quality of the area would not be improved to take advantage of enhancement opportunities.

Material Assets & Natural Resources: Land/Soil, Energy, Waste

- 3.21 The decline in the city's port-related industries has resulted in increasing amounts of vacant land with varying degrees of contamination⁴⁶. The Council has a Contaminated Land Strategy (2008) that provides a framework for addressing potentially contaminated land. The SRF area is entirely previously developed land, with no natural resources (such as woodland or agricultural land) present. The area has a variety of built infrastructure in the form of buildings and roads.
- 3.22 Without the Plan and SPD, there will be no direction or management of development and no coordinated approach to regeneration of previously developed land, energy and waste resources⁴⁷ in the area.

Key Environmental Issues, Problems & Opportunities

- 3.23 The key environmental issues identified through the SA/SEA scoping process (February 2014) for appraisal of the emerging Local Plan remain relevant and valid for the SEA of the Upper Central SRF SPD. The area-specific issues identified from the baseline characterisation and relevant plan objectives are summarised below; it may be noted that issues and problems often present opportunities through regeneration proposals:
- The City Centre is a major opportunity for continuing economic growth and regeneration with wider benefits for health and well-being
 - Upper Central has limited quality green spaces; lack of quality public realm
 - Improve open/green space and biodiversity within green infrastructure strategy
 - Upper Central has poor pedestrian/cycling routes, convoluted connectivity; need to improve safety
 - Poor air quality associated with emissions from road traffic
 - Protection & enhancement of cultural heritage assets, including the World Heritage Site

⁴⁶ Liverpool Local Plan SA Report (September 2016)

⁴⁷ Waste is dealt with by the Joint Merseyside & Halton Waste Local Plan (2013)

- Degraded urban quality, unsightly with disused buildings & under-developed land
- Need to protect & enhance important heritage assets

4.0 SEA FINDINGS

Introduction & SA of Submission Local Plan (January 2018)

- 4.1 The adopted Local Plan (UDP 2002) and the emerging new Local Plan (submitted for independent examination in May 2018) have been subject to SA/SEA in accordance with the relevant legislation and guidance at the time. Policies EC1-5 relating to Employment Land & the Economy were tested through SA/SEA and the SA Report⁴⁸ (Appendices, pages 115-128, October 2016) generally found positive effects for SA Objective Nos 14 for employment/economy, 15 vitality/viability, 11 & 12 health/social inclusion, 7 & 8 biodiversity/land through reuse of previously developed land, and 5 the historic environment (by bringing derelict and vacant buildings back into use).
- 4.2 The SA found potential minor negative effects for SA Objective Nos 2 water & 3 waste – as additional waste will be produced and there is increased risk of air pollution through additional traffic movements. Potential minor positive effects were indicated for No 1 resources and No 6 biodiversity & green infrastructure (GI) – but with some uncertainty as the site-specific locations for employment allocation were not yet determined. It may be noted that emerging Local Plan Policies GI1-5 and R1 provide mitigation measures to minimise potential negative effects on air quality and GI.
- 4.3 The SA tested the Vision and Character Area Priorities within the City Centre (Table 5.3 SA Report January 2018) and found mostly minor positive or neutral effects for SA Objectives for the Knowledge Quarter. Table 5.4 presents the summary SA findings for the policies within Chapter 6: Liverpool City Centre. For Policy CC3 the Knowledge Quarter, the SA found major positive effects for SA Objectives on Centre Vitality/Viability; Economy/Employment; Education; Transport; Landscape; Green Infrastructure; and the Historic Environment. Minor positive or neutral effects were indicated for other SA Objectives. The significant positive effects for the Knowledge Quarter area relate to the expansion of the established uses of the area. The SA noted that new services and facilities will be supported by local people and visitors that will in turn attract new investment and maintain viability and vitality.
- 4.4 The emerging Local Plan has also been tested through Habitats Regulations Assessment (HRA) in accordance with the requirements of the HRA Regulations. The final HRA Report⁴⁹ (December 2017) concluded that the Local Plan would not lead to likely significant effects on the identified European and Ramsar designated sites – the emerging Local Plan will provide sufficient policy protection to ensure no adverse effects on the integrity, even when considered in combination with other projects and plans.
- 4.5 Thus, whilst the new Local Plan is still being developed and has not yet been independently examined, the emerging elements have been subject to iterative and ongoing consultation including Regulation 18 & 19. Comments

⁴⁸ Liverpool Local Plan SA Report (September 2016)

⁴⁹ <https://liverpool.gov.uk/localplanexamination>

received on both the plan-making, together with the accompanying SA/SEA and HRA have been taken into consideration in preparation of the Submission Local Plan.

Spatial Development Framework: Overarching Masterplan Principles with Key Themes, Character Area Development Principles, & Illustrative Masterplan

4.13 Biodiversity & Green Infrastructure

[SEA Topics: biodiversity, flora, fauna, health]

SEA/SA Objectives:

- 6.** To protect, enhance and manage the City's green infrastructure resource to maximise benefits for health, biodiversity, climate change and economic growth
- 7.** To protect, enhance and manage biodiversity, the viability of endangered species, habitats and sites of geological importance

4.14 An Initial Habitats Regulations Assessment (HRA, 2012) was undertaken on the earlier Core Strategy and this concluded that there would be no likely significant effects (LSEs). This work was built upon to identify possible impact pathways that result from emerging Local Plan policies that could lead to negative LSEs on the integrity of a European site – either individually or in-combination with other projects and plans. A further HRA Report (July 2016)⁵⁰ accompanied the draft Local Plan on public consultation in October 2016. This HRA identified impact pathways from the draft Liverpool Local Plan to many of the European and Ramsar sites, particularly in-combination with other plans and projects. However, it was ultimately concluded that the Local Plan would not lead to likely significant effects on these sites – the emerging Local Plan will provide sufficient policy protection to ensure no adverse effects on the integrity of even when considered in combination with other projects and plans.

4.15 The adopted UDP includes policies to protect and enhance biodiversity and green infrastructure, including:

- Policy OE6 Development and Nature Conservation
- Policy OE7 Habitat Creation and Enhancement
- Policy OE11 Protection of Green Space
- Policy OE12 Enhancement of Green Space

4.16 The emerging new Local Plan (Submission draft May 2018) includes policies to protect and enhance biodiversity and green infrastructure (GI), as follows:

- Policy GI1 Green Infrastructure
- Policy GI3 Open Space, Sport & Recreation Provision
- Policy GI4 Water Spaces

⁵⁰ http://consult.liverpool.gov.uk/portal/draft_liverpool_local_plan?tab=files

- Policy GI5 Protection of Biodiversity & Geodiversity
- Policy GI7 New Planting and Design
- Policy GI8 Management of Existing Site Vegetation
- Policy GI9 Green Infrastructure Enhancement

- 4.17 These policies provide strong mitigation measures and guidance for development proposals to ensure that there are likely to be positive effects for SA Objective Nos 6 & 7 – and these will be synergistic and cumulative in the longer-term. Policy GI9 should help to enable net gains in biodiversity and green infrastructure overall through seeking enhancements. Major positive effects were identified for many of these policies by the SA Report (Appendices, 2016). Strategic Policy STP2 Sustainable Growth Principles & Managing Environmental Impacts provides guidance and strong mitigation overall for development and including specific reference to sensitive biodiversity. The Strategic Policies have been subject to SA and the SA Report⁵¹ (pages 60-61, January 2018) found major positive effects.
- 4.18 The draft SRF references the requirements for green infrastructure in national planning policy in Section 4, and mentions urban greening (Brownlow Street), replacement of trees (Ranelagh Place), and green infrastructure for Seymour Street in the Example Draft Development Proformas. There is no apparent overarching support or principle for green infrastructure in order to recognise and promote the multi-functional opportunities for biodiversity, human health/well-being, absorbing air pollution, and helping adapt to the vulnerabilities of climate change effects.
- 4.19 The principles of GI are well established in urban design⁵² and this can be particularly significant for previously developed and unused land where there can be important diverse flora and fauna. Whilst the SRF SPD is likely to have positive effects, and this will be ensured through emerging Local Plan Policies GI1, 5 & 9, it is considered that these positive effects could be more certain and improved if the SRF refers explicitly to the opportunities for contributing to habitat creation and linkages especially in line with objectives for the GI Strategy for the City.

SEA Recommendation:

- The opportunities for biodiversity and green infrastructure enhancements should be made explicit - perhaps in the overarching principles Theme 2 improve pedestrian experience or Theme 4 high quality infrastructure; or an additional overarching theme could be considered – Theme Enhancing Green Infrastructure.

⁵¹ Ibid

⁵² For example: <https://www.tcpa.org.uk/pages/category/green-infrastructure-partnership>
<http://publications.naturalengland.org.uk/publication/35033>

4.20 **Communities & Accessibility; Human Health**

[SEA Topics: Population, Health, Material Assets]

SEA/SA Objectives:

- 9.To reduce the need to travel by car and improve choice and use of sustainable transport modes
- 10. To provide a mix of good quality, affordable and resource efficient housing
- 11.To improve health and reduce health inequalities (including mental health)
- 12.To reduce poverty and social deprivation and secure economic inclusion
- 13.To give everyone access to learning, training skills and knowledge
- 14.To provide for future economic growth, support new and existing businesses, and maintain high and stable levels of employment
- 15.To enhance the vitality and viability of city, district and local centres

4.21 The adopted UDP includes various policies to protect communities, accessibility, and health/well-being, for example:

- Policy T6 Cycling
- Policy T7 Walking and Pedestrians
- Policy T9 Road Safety
- Policies GEN7 and Policies C1-C10 on Community Facilities
- Policy HD19 Access for all
- Policy HD20 Crime Prevention
- Policy EC6 Mixed Use Areas and Sites for Various Types of Development

4.22 The emerging Local Plan (Submission, May 2018) includes policies to protect transport and promote more sustainable modes; those relevant to the SPD as follows:

- Policy TP1 Improving Accessibility & Managing Demand for Travel
- Policy TP2 Transport Assessments
- Policy TP5 Cycling
- Policy TP6 Walking
- Policy T8 Car Parking & Servicing
- Policy T9 Public Transport

4.23 These policies provide guidance for development proposals to ensure that strong mitigation measures are identified and implemented to minimise potential negative effects and promote positive effects for SEA Objective No 9. These draft policies have been subject to SA and the SA Report (Appendices January 2018) generally found neutral or positive effects against SA Objectives; no negative effects were reported⁵³.

4.24 The draft SRF strongly recognises the need for and promotes opportunities for improving the public realm and more sustainable transport – through the overarching Masterplan Principle Theme 2 improve the pedestrian

⁵³ Except for TP4 Strategic Road Schemes and this policy is not relevant to the SPD

experience, and the 5 key site-wide public realm projects. The draft SRF acknowledges the need for safety as well as attractiveness in cycling/walking routes – with positive effects for SA objectives for health/well-being. The SRF assumes that the proposed Lime Street/St Georges & Brownlow Hill schemes will be delivered by Liverpool City as part of the City Centre Connectivity programme. These schemes will significantly enhance the roadways and public realm.

- 4.25 Considerable research, consultation and design creativity has been used in developing the draft SRF to improve connectivity, linkages and accessibility with improved streets and walking/cycling that will have positive effects that are likely to extend beyond the Upper Central area. The SRF recognises that it is imperative that travel by bus is attractive and reliable in order to encourage a modal shift from car users; the bus facilities at the bottom of Brownlow Hill are identified as an important interchange and it is noted that these should be improved. The SRF has investigated transport improvements for key elements of the Upper Central area – Brownlow Hill/Mount Pleasant; Renshaw Street; Brownlow Hill; Ranelagh Place; Brownlow Hill Adelphi – suggesting opportunities for highways, the public realm, routes/facilities for cyclists and pedestrians. Guidance is then further developed with spatial requirements in the Key Site-Wide Public Realm Projects that rebalance how streets function through rethinking traffic management.
- 4.26 These positive effects for SA Objectives 9 & 11 are likely to be major cumulative over the longer term and could also be synergistic, inspiring other regeneration nearby with further enhancements for sustainable transport and accessibility. The new proposed pedestrian routes will help resolve existing problems, such as lack of or poor sustainable transport and the clusters of road traffic collisions, with major positive effects for SEA Objective No 9 sustainable transport and No 11 health.
- 4.27 Overall, the focus of the SRF SPD on economic regeneration will have major positive effects for SA Objectives 10-15 through helping ensure high quality mixed use developments with housing and employment and helping enhance the vitality of this area and as gateway to the city. Key Theme 3 Quality of Place & Identity supports existing businesses and encourages creative, innovate new industries alongside opportunities for leisure, education, tourism, culture, commercial and ancillary uses. Key land uses with development opportunities are further explained for each of the 6 Character Areas through relevant Key Principles and Illustrative Masterplan. Again, such positive effects are likely to be major and cumulative in the longer term and could also be synergistic – inspiring further regeneration nearby.

4.28 **Water, Air & Climatic Factors**

[SEA Topics: Water, Air, Material Assets, Health, Climatic Factors]

SEA/SA Objectives:

- 2. To reduce all types of flood risk and encourage effective water management
- 4. To protect and improve water, air and soil quality

4.29 The adopted UDP includes environmental protection policies such as:

- Policy EP13 Flood Risk
- Policy EP2 Contaminated Land
- Policy EP11 Pollution
- Policy EP12 Protection of Water Resources

4.30 The emerging draft Local Plan (Submission May 2018) includes policies to protect and improve water and air quality; those relevant to the SPD as follows:

- Policy R1 Air, Light, & Noise Pollution
- Policy R2 Hazardous Substances
- Policy R3 Flood Risk & Water Management
- Policy R5 Rivers, Canals, Watercourses & Culverts
- Policy GI4 Water Spaces

4.31 These draft policies have been subject to SA and the SA Report (Appendices, January 2018) generally found neutral or positive effects against SA Objectives; no negative effects were reported.

4.32 The draft SRF SPD recognises the connections with a natural route to the WHS waterfront from the Upper Central area. The Upper Central area is in Flood Zone 1 with only a low probability of flooding. The SRF does not make any specific mention of any areas that need particular attention with regard to water quality – but extant and emerging policies provide strong guidance and mitigation measures to ensure that there are no negative effects. Such policies promote the use of sustainable urban drainage systems, where appropriate.

4.33 By regeneration of previously developed land, major positive effects are indicated with regard to SA Objectives for soil quality, through avoiding development of greenfield land. The SRF has not identified any particular potential for problems through disturbance of contaminated land; this is less likely than other areas of the city as there have been less industrial previous uses.

4.34 The draft SRF SPD seeks to encourage sustainable transport with new and improved road traffic and management, new/improved cycle and pedestrian routes that will contribute to mitigating the effects of car and vehicle emissions. As emissions standards tighten and the use of electric

vehicles increases, together with improvements in sustainable transport, effects on air quality should be reduced in the longer term. There may still be negative effects for air quality and climatic factors in the shorter to medium terms in this city centre area designated as an AQMA for nitrogen dioxide from traffic emissions. The draft SRF includes requirements for new tree planting and this will help mitigate negative effects on air quality through vehicle emissions. Overall, potential for positive effects on air quality in time but some uncertainty of significance at this stage.

- 4.35 There may be scope for further mitigation of negative effects on air quality through encouragement of green planting to help absorb/treat air pollution such as with vertical walls/green roofs. Whilst Key Theme 4 High Quality Infrastructure requires energy and sustainability best practice, this is not defined. There may also be the scope to enhance resilience to climate change and mitigate risks of urban heat islands, although it is appreciated that the Vision for the emerging Local Plan requires comprehensive energy and heat plans and Policies for energy efficiencies and low carbon.

SEA Suggestion:

- Consider whether green planting to mitigate air pollution and increase resilience to climate change effects could be encouraged through the SPD.

4.36 Cultural Heritage

[SEA Topics: Cultural Heritage, including Architectural & Archaeological Heritage]

SEA/SA Objectives:

5.To preserve, enhance and manage the city’s rich diversity of cultural, historic and archaeological buildings, areas, sites and features and their settings

- 4.37 The Upper Central framework area is located within the WHS Buffer Zone. Development is guided by the WHS SPD (adopted 2009) which was subject to SA/SEA in accordance with the SEA Regulations during its preparation. The SA Report⁵⁴ concluded that the WHS SPD is likely to have significant positive effects on SA Objectives to improve safety, health, accessibility, sustainable transport, local character & landscape, cultural & historic assets, public & green spaces, and economic factors to improve the City’s image through redevelopment of vacant buildings.

- 4.38 The draft SRF makes explicit that all development within the SRF area should consider the WHS SPD – Overarching Principle Theme 6 preserving/enhancing heritage assets, and Key Principle 3 Built Form in respect of scale and key

⁵⁴ <http://liverpool.gov.uk/media/9643/sustainability-appraisal.pdf>

views – thus providing strong mitigation to avoid any negative effects on the World Heritage Site.

4.39 The importance of the heritage assets in and around the Upper Central area is acknowledged in the Vision for the SRF SPD. The SRF lists and describes the heritage assets of the area, and then carefully considers the opportunities for better respecting and enhancing heritage within the area. The Overarching Masterplan Principle Theme 5 preserving and enhancing heritage assets confirms that heritage is embedded within the SRF – indicating likely major positive effects for SA Objective No 5.

4.40 The adopted UDP includes policies to protect heritage assets and their settings, for example:

- Policy GEN3 Heritage and Design in the Built Environment
- Policy HD1-5 Listed Buildings
- Policy HD16 Protection of Ancient Monuments
- Policy HD17 Protection of Archaeological Remains

4.41 The emerging Local Plan (Submission May 2018) includes policies to protect and improve cultural heritage; those relevant to the SPD as follows:

- Policy HD1 Designated Heritage Assets
- Policy HD2 Non-Designated Heritage Assets of Archaeological Remains

4.42 These draft policies have been subject to SA and the SA Report (Appendices, January 2018) generally found neutral or positive effects against SA Objectives; no negative effects were reported.

4.43 The draft SRF SPD has been prepared with careful consideration of the adopted SPDs, including the WHS SPD, and the emerging Local Policies – all have been subject to SA/SEA. These requirements and policies provide strong guidance to promote positive effects and ensure mitigation measures are in place to minimise potential negative effects. The Overarching Masterplan Principle Theme 5 preserving and enhancing heritage assets is embedded in the SRF, and therefore, it is considered that the Upper Central SRF is likely to have major positive effects on SEA Objective No 5 by preserving, enhancing and managing the important heritage assets of the SRF area. These effects will be synergistic and cumulative, extending into the wider area of the City, including further indirect effects for human health/well-being and economic/cultural development.

4.44 **Landscape & Urban Quality**
[SEA Topics: Landscape, Material Assets]

SEA/SA Objectives:

8.To maintain and enhance the quality of landscapes and townscapes, and achieve a quality urban design which enhances the local character

4.45 The adopted UDP includes policies to protect and improve landscape and urban quality, for example, as follows:

- Policy GEN3 Heritage and Design in the Built Environment
- Policy HD18 General Design Requirements
- Policy HG7 Conservation Areas
- Policy HD22 Existing Trees and Landscaping
- Policy HD23 New Trees and Landscaping

4.46 The emerging draft Local Plan (Submission May 2018) includes policies to protect and improve landscape and urban design; those relevant to the SPD include the following:

- Policy CC3 Character Areas
- Policy EC6 Mixed Use Areas and Sites for Various Types of Development
- Policy SP3 Design of new Development within the City Centre MRA, District, Local and Neighbourhood Centres
- Policy UD1 Local Character and Distinctiveness
- Policy UD2 Development Layout and Form
- Policy UD3 Public Realm
- Policy UD4 Inclusive Design
- Policy UD5 New Buildings
- Policy UD6 Alterations and Extensions to Existing Buildings
- Policy UD7 Public Art

4.47 These draft policies have been subject to SA and the SA Report (Appendices, January 2018) generally found neutral or positive effects against SA Objectives; no negative effects were reported.

4.48 As with the assessment of heritage assets as described previously, conserving heritage and character through Overarching Masterplan Principle Theme 5 is embedded in the draft SRF. This is enhanced through Overarching Masterplan Principle Theme 3 a mix of uses to create quality of place and identity. Guidance on landscape and urban quality is provided through the 5 site-wide public realm projects that are imperative to the re-creation and re-imagining of the SRF area – and will act as catalysts to further regeneration. Further guidance is then provided through identification of relevant Principles for each of the 6 Character Areas – and these include built form, public realm/open space, and development site proformas. Thus, landscape and

urban quality is embedded at each of the 3 stages of the Spatial Development Framework.

4.49 Therefore, it is considered that the SRF SPD will have major positive effects on landscape and urban quality through regeneration and reuse/redevelopment of vacant/disused buildings and land. The overall approach in the SPD indicates positive effects that will be synergistic and cumulative in the longer-term for SA Objective No 8.

4.50 **Natural Resources: Land/Soil, Energy & Waste**

[SEA Topics: Soil, Health, Material Assets]

[Water, Biodiversity & Air are considered within other themes]

SEA/SA Objectives:

1. To use natural resources prudently and efficiently, and increase energy generated from low carbon sources
3. To minimise the production of waste and increase reuse, recycling and recovery rates
4. To protect and improve water, air and soil quality

4.51 The adopted UDP includes policies relevant to sustainable use of natural resources, including as follows:

- Policy HD21 Energy Conservation
- Policy EP1 Vacant, Derelict and Neglected Land
- Policies EP5-10 Waste management
- Policy EP16 Renewable Energy
- Policy EP17 Minerals

4.52 The emerging draft Local Plan (Submission May 2018) includes policies to protect and improve landscape and urban design; those relevant to the SPD include the following:

- Policy R2 Hazardous Substances
- Policy R6 Minerals
- Policy R7 Renewable and Low Carbon Energy
- Policy R8 Wind Turbines
- Policy R9 Solar Panels
- Policy R10 Non-Fossil Fuel Energy Sources

4.53 The draft policies have been subject to SA and the SA Report (Appendices, January 2018) generally found neutral or positive effects against SA Objectives; no negative effects were reported. The SA noted that there is the potential for some negative effects through the generation of waste from new development – but this could be mitigated through encouraging avoidance, recycling and reuse.

- 4.54 The draft SRF SPD includes Overarching Masterplan Principle Theme 4 provision of high quality infrastructure – requiring state of the art infrastructure such as energy sustainability best practice in all new developments. The SRF does not make any specific requirement with regard to waste but additional waste produced through new development this will be guided and managed through the Joint Merseyside & Halton Waste Local Plan⁵⁵.
- 4.55 Thus, sustainable use and management of natural resources is embedded within the SRF, and, together with the emerging Local Plan Policies, will have positive effects for SEA Objectives on natural resources.

SEA Suggestion:

- Consideration could be given to indicating a required sustainability or environmental standard that would clarify requirements and demonstrate commitment to exemplar design, construction and operation/occupation.

Inter-relationships

- 4.56 The Upper Central SRF SPD is strong on guiding developers, communities and other interested people on the inter-relationships between regeneration, sustainability and environmental factors. A key feature of this SRF is transport and movement – and there has been careful analysis and research to understand the historical and recent developments that have contributed to the existing problems, together with the aspirational requirements for more sustainable development.
- 4.57 The first two Themes of the Overarching Masterplan Principles relate to the creation of a true gateway and improving permeability and linkages to the City. By embedding these Principles, positive effects are indicated for inter-related topics particularly such as health/well-being, air quality, communities, and cultural heritage. Inter-relationships could be enhanced through explicit mention of the multi-functionality of green infrastructure – for biodiversity, climate change adaptation, air quality, and people’s health and well-being.
- 4.58 The complexity of interactions can make guidance difficult to navigate and use; however, this SPD is well structured and demonstrates the inter-relationships between topics through a framework approach with Overarching Masterplan Principles/7 Themes, followed by the 5 site wide public realm projects (the catalyst to further development), followed by the character area principles applied to each of the 6 Character Areas as relevant – and to guide future development and against which planning applications can be assessed. The positive effects from the SPD are likely to extend beyond the spatial boundaries through the enhanced and improved linkages and inspiring other development through state of the art projects.

⁵⁵ <http://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/plan-making-in-liverpool/current-local-plan-documents/joint-waste-plan/>

5.0 SUMMARY CONCLUSIONS, PROPOSED MONITORING & NEXT STEPS

Summary Conclusions

- 5.1 Liverpool City Council is preparing the Upper Central Spatial Regeneration Framework (SRF); when adopted, this will be a Supplementary Planning Document (SPD) that will then comprise part of the Local Development Framework of planning documents, and in conformity with the adopted UDP and the emerging Local Plan (Submission May 2018). The Upper Central SRF has been prepared to establish a planning framework and development principles to guide and shape development in the Upper Central area.
- 5.2 Supplementary Planning Documents (SPDs), unlike a Local Plan, do not have a mandatory requirement for SA incorporating Strategic Environmental Assessment. However, they may in exceptional circumstances require an SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the Local Plan. The emerging new Local Plan has been subject to SA/SEA and wide consultation, but the Plan is still draft and has not yet been tested through independent examination.
- 5.3 An SEA Screening & Scoping Report (September 2018) identified that the SRF SPD is likely to have significant effects on human health, material assets, cultural heritage, and biodiversity, flora and fauna. Therefore, an SEA is required due to the spatial extent of the likely effects and the value and vulnerability of the area affected. However, the SA/SEA already undertaken of the emerging Local Plan does carry some weight (as does the draft Plan) and the SEA of the Upper Central SRF SPD builds upon the SA/SEA work already undertaken by the Council.
- 5.4 The SEA has been undertaken according to good practice and in line with Government guidance. It is aligned with the SA/SEA of the Local Plan, following the same methods and approach, and is proportionate - acknowledging the hierarchy of plan-making and the tiering of assessments processes. Overall, the SEA has found that the implementation of the Upper Central SPD will have positive effects on SA Objectives that are within the scope and sphere of the SRF. Effects on employment/economy, communities, health & well-being, sustainable transport, and landscape/urban quality are likely to be major positive, that could be synergistic and cumulative in the longer-term. Such effects are also likely beyond the spatial boundary of the Upper Central area as the implementation of the SPD inspires and encourages other regeneration nearby.
- 5.5 The summary findings may be represented as follows:

Table 5.1: Summary SEA Findings⁵⁶

No. SEA Objective	
SEA Theme: Biodiversity & Green Infrastructure	
	+
6. To protect, enhance and manage the City's green infrastructure resource to maximise benefits for health, biodiversity, climate change and economic growth	+
7. To protect, enhance and manage biodiversity, the viability of endangered species, habitats and sites of geological importance	0/+?
SEA Theme: Communities, Accessibility: Human Health	
	++
9. To reduce the need to travel by car and improve choice and use of sustainable transport modes	++
10. To provide a mix of good quality, affordable and resource efficient housing	+
11. To improve health and reduce health inequalities (including mental health)	++
12. To reduce poverty and social deprivation and secure economic inclusion	++
13. To give everyone access to learning, training skills and knowledge	0
14. To provide for future economic growth, support new and existing businesses, and maintain high and stable levels of employment	++
15. To enhance the vitality and viability of city, district and local centres	++
SEA Theme: Water, Air & Climatic Factors	
	+
2. To reduce all types of flood risk and encourage effective water management	+
4. To protect and improve water, air and soil quality	0/+? /++
SEA Theme: Cultural Heritage	
	++
5. To preserve, enhance and manage the city's rich diversity of cultural, historic and archaeological buildings, areas, sites and features and their settings	++
SEA Theme: Landscape & Urban Quality	
	++
8. To maintain and enhance the quality of landscapes and townscapes, and achieve a quality urban design which enhances the local character	++
SEA Theme: Natural Resources – Land/Soil, Energy & Waste	
	+
1. To use natural resources prudently and efficiently, and increase energy generated from low carbon sources	+?
3. To minimise the production of waste and increase reuse, recycling and recovery rates	0
4. To protect and improve water, air and soil quality	+/? /++

5.6 The SEA made one recommendation – that the opportunities for biodiversity and green infrastructure enhancements should be made explicit - perhaps in

⁵⁶ Please note that the SEA process does not add up or weight factors; each topic should be considered according to its own characteristics, standards and methods of assessment; professional judgement is used to compile summary effects for each environmental sustainability theme.

the overarching Principles Theme 2 improve pedestrian experience or Theme 4 high quality infrastructure; or an additional overarching theme could be considered – Theme Enhancing Green Infrastructure.

- 5.7 The SEA made two suggestions for improving the environmental sustainability of the draft SRF SPD as follows:
- Consider whether green planting to mitigate air pollution and increase resilience to climate change effects could be encouraged through the SPD.
 - Consideration could be given to indicating a required sustainability or environmental standard that would demonstrate commitment to exemplar design, construction and operation/occupation.

Proposed Monitoring

- 5.8 The SPD, together with the other Local Plan Documents and the SA/SEA, will be monitored as part of the Authority's comprehensive Monitoring Report⁵⁷, as required by Government. Section 7 Delivery & Phasing of the SPD includes commitments to monitoring and review. In order to be flexible and adaptable to change and to ensure that the framework area is developed in a timely manner, the effectiveness to the SRF and its key principles will be monitored, and a formal review undertaken when appropriate. No additional proposed monitoring that might be required as part of the SEA process was indicated from the findings of the SEA.

Next Steps

- 5.9 The Draft SRF SPD will be placed on public consultation in July 2019. This Environmental Report that records the SEA will also be placed on the Council's website for 5 weeks statutory consultation in line with the SEA Regulations. Representations on the draft SRF SPD and the SEA will be taken into account in the preparation of the final SPD and including any comments from the environmental regulators. Upon adoption of the SPD, there will be an Environmental Adoption Statement published in line with the SEA Regulations.

Any comments on this SEA Report should be sent to:

Uppercentral@liverpool.gov.uk

⁵⁷ <http://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/plan-making-in-liverpool/authority-monitoring-report/>

Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive⁵⁸ (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)⁵⁹. This is Appendix 1 of the Environmental Report as required by the SEA Directive and the UK SEA Regulations. This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the Environmental Report (November 2018) - and in accordance with paragraph 32 of the National Planning Policy Framework (2018)⁶⁰.

SEA Directive & Regulation Requirements	SEA Report Section	Summary of Contents
<i>An outline of the contents, main objectives of the plan and relationship with other relevant plans</i>	Section 1 Introduction	Sets out the contents and purpose of the Draft SPD
	Section 3 Context & Baseline	Outlines context, baseline & including the relationship with other relevant plans, the implications for the Draft SPD & SEA; also signposts links with Local Plan & SA/SEA Scoping (2014) & SA Report (2018)
<i>The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan</i>	Section 3 Context & Baseline	Summarises the relevant baseline conditions for environmental aspects in the SPD area, and likely evolution without the SPD
<i>The environmental characteristics of the area likely to be affected</i>	Section 3 Context & Baseline	Summarised in Section 3 of Environmental Report.
<i>Any existing environmental problems which are relevant to the plan including, in particular, those in relation to any areas of a particular environmental importance</i>	Section 3 Context & Baseline	Summarises existing environmental issues/problems for the SPD area (para 3.23).
<i>The environmental protection objectives relevant to the plan and the way those</i>	Section 2 SEA Methods Section 3	Detailed SEA Framework guiding assessment of effects against the Objectives – grounded in the SA/SEA

⁵⁸ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

⁵⁹ <http://www.parliament.uk/documents/post/postpn223.pdf>

⁶⁰ <https://www.gov.uk/government/collections/revise-national-planning-policy-framework>

SEA Directive & Regulation Requirements	SEA Report Section	Summary of Contents
<i>objectives and any environmental considerations have been taken into account during its preparation</i>	Context & Baseline	Framework for the Local Plan as reported in Scoping (2014) and SA Report (2018).
<i>The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects</i>	Section 2 SEA Methods Table 2.1	Presents the SEA Framework of objectives that shows the issues listed by the SEA Regulations that are progressed by which SEA objective. This ensures that all the issues are considered during the assessment of each element of the Draft SPD. The draft SPD was assessed against each SEA objective.
	Section 4	Describes the likely significant effects of implementing the Draft SPD. Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term.
<i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan</i>	Section 4	No significant negative effects were predicted; the SEA noted where the SRF suggested mitigation possibilities to address likely negative effects, for example, against the sensitive heritage assets.
<i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information</i>	Section 2 (paras 2.12-2.14)	There are no other reasonable alternatives to the Upper Central SPD. The do-nothing scenario is assessed, and this is explained in Section 2.
	Section 2 Method	Outlines how the assessment was undertaken.

SEA Directive & Regulation Requirements	SEA Report Section	Summary of Contents
<i>A description of the measures envisaged concerning monitoring</i>	Section 5 (para 5.8)	Outlines measures proposed for monitoring the environmental effects of the implementation of the Draft SPD.
<i>A non-technical summary of the information provided under the above headings</i>	Report preface	Provides a non-technical summary.