

Southend on Sea Central Area Action Plan Proposed Approach

Sustainability Appraisal Non Technical Summary

On behalf of **Southend on Sea Borough Council**



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1 Introduction

1.1 Background

1.1.1 This report is the non-technical summary of the combined sustainability appraisal (SA) and strategic environmental assessment, of the Preferred Approach version of the Southend Central Area, Area Action Plan (SCAAP). The report and non-technical summary have been prepared by Peter Brett Associates, on behalf of Southend on Sea Borough Council.

1.1.2 This non-technical summary intended to provide an overview of the findings of the appraisal, with more detail of the process and outputs included in main report.

1.2 The Southend Central Area Action Plan

1.2.1 The purpose of the SCAAP is to set out a detailed and comprehensive planning policy framework for Southend's Central Area to guide the delivery of development to 2021. The SCAAP sits in the context of the other planning documents that make up the Local Development Framework (LDF) for the Borough, with each of these documents undergoing their own SA process.

1.2.2 Any development in the SCAAP area will be guided by these other LDF documents in addition to the policies and proposals of the SCAAP. The most relevant other documents of the LDF are:

- The Core Strategy: this sets the strategy for how development should occur in the Borough, including the role of Southend's Town Centre and Seafront;
- The Development Management Development Plan Document: sets out the detailed policies that will be used to help determine planning application throughout the Borough including in the Central Area.

1.2.3 In undertaking the SA it is essential that it remains focused on those issues that the SCAAP could influence and therefore it needs to be in the context of these other plans. The SA also needs to recognise that some strategic matters, such as the growth role of the Central Area, is already set through policy and has already been subject to SA.

1.2.4 The SCAAP, with its current boundary, has been through several preparation stages to reach the current 'Preferred Approach' version. These stages have entailed:

- SCAAP Issues and Options (March 2010): this was the first version of the AAP that covered Southend Central including parts of the seafront, prior to this stage separate town centre and seafront AAPs were proposed.
- SCAAP Proposed Submission (September 2011): this took forward the discussion of Issues and Options in the earlier version to present a complete set of policies to for the Central area; and
- SCAAP Preferred Approach (December 2015): this is the current stage of the SCAAP and again sets out a preferred policy approach for consultation, which includes some options for consultees to consider.

1.2.5 The SA of the SCAAP has been an ongoing process through each consultation stage of the SCAAP, with an SA Report prepared at every stage. SA Reports on earlier stages are available on the Council's LDF website.

1.3 The Sustainability Appraisal Process

- 1.3.1 The purpose of the SA is to identify likely effects of the any plan on achieving sustainability development, including environmental effects. The SA also makes recommendations on how the policies of the SCAAP could be used to help mitigate potential adverse effects of development, as well as identifying ways that beneficial effects could be delivered.
- 1.3.2 As well as helping make a better plan there is a legislative requirement for SA. The statutory requirement for SA is from the Planning and Compulsory Purchase Act 2004 as well as required through national planning policy for England. There is also the parallel requirement from European law to complete a 'Strategic Environmental Assessment' (SEA) and in keeping with national planning guidance, these two processes are carried out together in a combined assessment, commonly referred to as simply SA.
- 1.3.3 The SA should consider the following questions:
- Could these effects be of special significance?
 - Are there ways of reducing or mitigating adverse effects?
 - Can any beneficial effects be further enhanced by positive planning?

2 Baseline and Context

2.1 Introduction

2.1.1 In completing the SA it is necessary get an understanding of the current character of the plan area to be able to assess the impact that the SCAAP might have. To achieve this baseline information is collected as well as a review of other plans and strategies covering the area.

2.2 Summary of sustainability issues

2.2.1 From the baseline information and review of plans and strategies key issues have been identified that the SCAAP may have a role in helping to address and that the SA will need to take into account in defining sustainable development for the Central Area. These are:

The environment

- development should help in the continued enhancement of the built environment in the Central Area, with new buildings of high quality and developed to sound urban design principles and reduce inequalities in the quality of the built environment;
- there is a lack of public open greenspace in the town centre, wherever possible opportunities need to be taken to improve urban greening and introduce new public open space;
- the area is under quite high risk of flooding, although direct tidal inundation is largely mitigated for through sea flood defences. There is the potential for surface water flooding in time of high rainfall in the Central Area, and effects of climate change will increase this and therefore new development will need to take this into account, including through the provision of sustainable drainage;
- nature conservation and biodiversity assets within the built up area are limited, and every attempt should be made to conserve and enhance existing assets, and create new ones, as well as the protection and enhancement of wildlife corridors
- habitats of international significance are located within the Borough, although outside the built development boundary. These must be protected not only from direct disturbance from development but also change that would threaten their integrity, such as increased pollution or changes in water availability;
- there are increasing traffic levels in the Borough and Central Area, with consequences for air quality, and new development must help to limit any increase in this, by endeavouring to suggest a change to travel patterns (number, length and mode), through the spatial strategy. The number of people who walk to work or use public transport is higher than the national average, although over a fifth drive (Census 2011);
- the Central Area is well connected in terms of public transport with three railway stations within the area and the bus station. However, there is a need to improve the pedestrian and cycling environment, especially where dual carriageways and the railway lines bisect the area; and
- the quality of the built environment is important, not only with the effect of new building in 'mending the fabric', but also in affecting existing areas of identifiable character. Parts of central Southend are characterised by a current low quality in the built environment, although the underlying quality of the natural and built environment is high in many areas with many listed and landmark buildings and several Conservation Areas.

Communities

- the Central Area has a role to play in creating a high quality residential environment that encourages people to take healthy lifestyle choices, such as more Active Travel. To achieve this there is a need to improve the public realm to encourage more people to walk and make cycling safer. This includes reducing severance caused by main roads running through the area and links over the railway;
- approximately 22,000 people live in the Central Area, 13% of the Borough's population; there is an identified need for affordable housing in the Borough and in Central Southend. Most of the housing in the Central Area is flats or maisonettes and one-bedroom properties are more prevalent. There may therefore be a need for larger units including family homes. There is a demand for affordable housing, including to replace Queensway House recently demolished;
- the Central Area is well served by public transport and in particular railway services, there is a need to improve some bus services including reducing journey times on the A127 to encourage more people to travel by bus and link the new major employment hub at the airport;
- there are longstanding inequalities in the Central Area with pockets within the Kursaal, Victoria and Milton wards all experiencing high levels of deprivation, which are some of the highest in in England compared to other areas of the same or neighbouring wards with low levels of deprivation (e.g. Chalkwell ward contains some of the least deprived areas in England);
- there is the potential to improve the cultural offer in Southend, including through providing more services for the community such as a new public square for events;
- the Central Area can accommodate more residential development, helping reduce pressure on other parts of the Borough, including potential threats to open space and agricultural land on the periphery; and
- there is a growing student population, both resident and visiting, in the Central Area.

The economy

- The Seafront is a principal asset in the Central Area, attracting visitors to the town and also being well used by the local community. Routes along the seafront also provide a sustainable transport route for walking and cycling;
- the Central Area is a focus of employment for the Borough (33% of total employment), while this role needs to be maintained it is important to ensure high quality jobs in a range of employment sectors to avoid the need for residents to commute to London for work;
- There are a mix of employment types in the Central Area, with the financial sector, real estate more prevalent than for the Borough as a whole, there is also a growing sector of cultural and creative industries;
- car parking needs to continue to managed in the Central Area to support the retail and visitor economy but help encourage more people to travel to work by sustainable modes and ensure land is used efficiently;
- there are 6 million visitors to the Borough a year, focused in the Central Area, the majority are day visitors who spend around £330 million / year. Tourists and visitors to the Central Area need to be encouraged to stay longer and spend more through the creation of new visitor attractions and support for hotels;
- the Central Area is the focus for tourism and creative industries in the Borough, as well as the location of much of the office stock, some of which is dilapidated and in need of

renewal. The public transport connectivity of the Central Area make it ideally suited to high employee density development, such as office space;

- the Gross Value Added of Southend is lower than the regional average and there is a need to encourage more jobs that retain the skilled and professional workforce in the town;
- the town centre is the main retail area of the Borough, although retail vacancy is above national levels in some areas. Much of the Central Area retail is dominated by national retailers rather than independents with the main retail core along the High Street between the Royals and Victoria Shopping Centres;
- there is a great disparity in the types of jobs held by residents of the Central Area, the greatest proportion of are in 'professional' occupations and the second highest proportion are in 'elementary' occupations; and
- the Central Area has become the focus for higher and further education with development by Southend Essex College and University of Essex bringing landmark buildings into the area and an increasing student population.

2.3 Sustainability Framework

2.3.1 In order to be able to test the emerging policies of the SCAAP a set of sustainability objectives as part of a 'sustainability framework'.

2.3.2 This framework is made up of a number of sustainability objectives that have been derived from the characterisation and context of the Borough. These reflect the principal elements of sustainable development over which the SCAAP could have some influence. The framework in Table 1 is based upon that in the Core Strategy Sustainability Appraisal Framework.

Table 1: Sustainability Framework

Concern	Objective
Social progress which recognises the needs of everyone	
Accessibility	<ul style="list-style-type: none"> enable all to have similar and sufficient levels of access to services, facilities and opportunities
Housing	<ul style="list-style-type: none"> to provide the opportunity for people to meet their housing need
Education & Skills	<ul style="list-style-type: none"> to assist people in gaining the skills to fulfil their potential and increase their contribution to the community
Health, safety and security	<ul style="list-style-type: none"> to improve overall levels of health, reduce the disparities between different groups and different areas, and reduce crime and the fear of crime
Community	<ul style="list-style-type: none"> to value and nurture a sense of belonging in a cohesive community, whilst respecting diversity
Effective protection of the environment	
Biodiversity	<ul style="list-style-type: none"> to maintain and enhance the diversity and abundance of species, and safeguard these areas of significant nature conservation value
Landscape character	<ul style="list-style-type: none"> to maintain and enhance the quality and character and cultural significance of the landscape, including the setting and character of the settlement
Built environment	<ul style="list-style-type: none"> to maintain and enhance the quality, safety and distinctiveness of the built environment and the cultural heritage
Prudent use of natural resources	
Air	<ul style="list-style-type: none"> to reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere
Water	<ul style="list-style-type: none"> to maintain and improve the quantity and quality of ground, sea and river waters, and minimise the risk of flooding
Land	<ul style="list-style-type: none"> to use land efficiently, retaining undeveloped land and bringing contaminated land back into use
Soil	<ul style="list-style-type: none"> to maintain the resource of productive soil
Minerals and other raw materials	<ul style="list-style-type: none"> to maintain the stock of minerals and other raw materials
Energy sources	<ul style="list-style-type: none"> to increase the opportunities for energy generation from renewable energy sources, maintain the stock of non-renewable energy sources and make the best use of the materials, energy and effort embodied in the product of previous activity
Maintenance of high and stable levels of economic growth and employment	
Local economy	<ul style="list-style-type: none"> to achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity
Employment	<ul style="list-style-type: none"> to maintain and enhance employment opportunities matched to the size of the local labour force and its various skills, and to reduce the disparities arising from unequal access to jobs
Wealth creation	<ul style="list-style-type: none"> to retain and enhance the factors which are conducive to wealth creation, including personal creativity, infrastructure, accessibility and the local strengths and qualities that are attractive to visitors and investors

3 SA of the Plan to Date

3.1 Introduction

3.1.1 This section of the SA Report sets out the process of SCAAP preparation, and SA that has led to the current consultation version of the plan, in the preferred approach. This has included successive stages of preparation of the SCAAP and accompanying sustainability appraisal. The SA stages to date have included the appraisal of the preferred options and their alternatives, as well as iteration of the preferred approach from broad options.

3.2 Sustainability Appraisal of Options and Alternatives

- 3.2.1 Considering alternatives is an obligation of the Sustainability Appraisal (SA), and particularly the Strategic Environmental Assessment (SEA) process. That requires, '*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*' (paragraph 12(2)), are appraised and documented in the SA report'.
- 3.2.2 At the Issues and Options (2011) version of the SCAAP three spatial options were considered for development. All three options were appraised as part of the SA, including the preferred approach that was 'City by the Sea'. The SA found that this option was likely to help delivery the greatest benefits for sustainable development, although this would depend on funding being available.
- 3.2.3 Other alternatives for delivery were considered as an iterative process, with no other options for development explicitly stated and assessed, up to the Preferred Approach that considered options for managing the Primary Shopping Frontage.
- 3.2.4 The SCAAP recognises it is not to identify all of the sites in the Central Area that could be the location for new development during the plan period. Instead it identifies key areas where there is a recognised need of regeneration and renewal and identifies these as 'Opportunity Sites'. The Preferred Approach SCAAP identifies all sites with potential, even if these would be deliverable only after 2021. However, the SCAAP does not identify any specific alternative sites. All of the 'Opportunity Sites' are subject to SA as part of the Policy Area policies of the SCAAP.

4 The SA of the Preferred Approach SCAAP

4.1 Introduction

- 4.1.1 The Sustainability Appraisal (SA) has recognised that the Central Southend AAP (SCAAP) has an important role to play in the sustainable development of this area and the wider Borough.
- 4.1.2 The proposed SCAAP vision and objectives provide the foundation for the development of policies and proposals for the central area. However, these objectives are stronger for some areas, such as the importance of the conserving and enhancing the natural environment.

4.2 SA of the Preferred Approach SCAAP 2015

- 4.2.1 The SA has identified that the objectives, policies and proposals of the SCAAP have the potential to have beneficial sustainability development effects in the Central Area, as well as wider Southend and beyond. The SCAAP contains much that is very compatible with achieving sustainable development. There are many positive aspects of the plan in relation to delivering sustainable development that include:
- securing more sustainable transport access to town centre, with emphasis on walking and cycling as well as public transport, with the result of fewer car trips and more equitable access for all;
 - delivering improvements to the built environment through designing places and buildings that fit the context of the area and provide for a vibrant town centre;
 - supporting the economy of the town through providing new spaces for a diverse range of businesses, including offices, retail and strong emphasis on the growing the tourism economy;
 - protecting the assets of the central area, including historic and cultural heritage of the built environment and protecting the high quality natural environment and seafront;
 - supporting new mixed communities in the central area through the provision of new homes and community services, including schools, health centres and open space;
 - clear policies on the anticipated residential development in the SCAAP area, showing the status of individual sites and the timeframe for their delivery;
 - encouraging urban greening with policy criteria in place to help deliver new areas of planting throughout the Central Area, with the potential to have multiple sustainability benefits for the area; and
 - continuing to expand the university and college facilities in the town centre to support a thriving education sector, this will help create a vibrant town, skilled workforce and opportunities for business growth.
- 4.2.2 The SA of the submission SCAAP reveals some other sustainability issues. The SA makes recommendations on how some aspects of the AAP could improve the sustainability performance of the plan.
- 4.2.3 **Transport and movement:** To successfully achieve a modal shift away from car use, there is a need to ensure transport, movement and parking strategy presents a proactive and joined up approach to managing traffic in the town centre. Without this the regeneration of central

Southend could be adversely affected by increasing congestion, with negative health and environmental impacts.

- 4.2.4 The SCAAP has the potential to deliver significant benefits from achieving a modal shift to more sustainable travel, including walking and cycling that can also have benefits for the community and economy of Southend.
- 4.2.5 The policies of the SCAAP show a clear intention to make the town centre a better place with improvement to the pedestrian environment to encourage more people to walk. Improved links to the Central Area will also help reduce car use in the town centre, with benefits for the natural and residential environment.
- 4.2.6 **Residential development and communities:** Central Southend has a significant role to play in delivering new residential development for the Borough. The requirement is set through the Core Strategy for Southend.
- 4.2.7 The policies of the SCAAP are essential in helping ensure development in the Central Area make a suitable contribution to meeting Southend's housing needs. Therefore, the SCAAP has the potential to deliver sustainability benefits from supporting additional housing in the Central Area, supporting its viability and vitality and contributing to reducing car travel.
- 4.2.8 As the SCAAP evolves some further information could be included on the type of community facilities required to help secure their delivery to meet the needs of a growing Central Area population. There may be a particular demand as a result of the loss of community spaces and services at Queensway House, as well as the potential loss of other community spaces such as at Short Street. Community services are an essential part of ensuring sustainable communities in the Central Area.
- 4.2.9 Delivering new housing and community facilities at Queensway will take into account the emerging strategy of the 'Better Queensway' initiative; specific outcomes may need to be included in the final SCAAP. The Queensway policy recognises the need for no net loss of affordable housing and this approach could be extended to similar sites in the Central Area consideration could be given to going beyond Core Strategy policy on affordable housing to reflect a particular need or to recognise their former use.
- 4.2.10 Policies could include measures to control student accommodation throughout the Central Area to ensure it does not harm residential amenity or cause adverse impacts on the public realm. This should be a consideration of new purpose built student accommodation; particularly where this will provide a large amount of new rooms. Such measures could include policy requirements for planning applications to demonstrate how the sites will be managed.
- 4.2.11 The SCAAP clearly sets out the anticipated housing yield in each Policy Area. Tables for each Policy Area as well as a summary table show how housing will come forward on a mixture of new allocations, sites with expired permissions and sites with existing permission. This inclusion provides useful clarity on the role of each area and appreciation of the likely growth planned for and that already ready for delivery.
- 4.2.12 **The built and heritage environment:** The principle focus of the SCAAP is how improvements can be made to the built environment of the central area, through new

- development and enhancement. This will have positive sustainability impacts related to improving the image of the centre. A better 'sense of place' can help support the community's pride in the place where they live, which can have positive impacts on social sustainability. The town centre is also the showcase for the rest of the town, and therefore if this area has a high quality image it can encourage local and national investment in the whole town.
- 4.2.13 The SCAAP has the potential to deliver significant environmental benefits from supporting development that improves the built environment; this can include benefits for the economy and the communities of the town. There are many instances where proposals and policies of the SCAAP are likely to help deliver a higher quality built environment. This includes specific regeneration and renewal schemes, measures such as new planting and public art and policies to help ensure new and existing car parks are designed to reduce their impact on the built environment, for instance through use of greenwalls on multi-storey car parks.
- 4.2.14 There may be an opportunity for the SCAAP or other mechanisms (such as Article 4 directions) to help control change of use from office to residential development through permitted development rights. The current approvals for this change of use may be undermining a policy led approach to sustainable development in some part of the Central Area.
- 4.2.15 **Education and culture:** Support for education in the town centre will have positive sustainability impacts, not only from improving availability of learning sites but also from the vibrancy a student population can bring to the central area.
- 4.2.16 The SCAAP has the potential to deliver benefits relating to education, supporting local communities and the economy.
- 4.2.17 However, the SA identifies that there will be the need to ensure that the supply of school places is monitored and new facilities provided as necessary. Currently, there is likely to be capacity in existing schools until the end of the plan period. However, consideration needs to be given to the longer term and possible suitable site in or near the Central Area. Without necessary provision there may be a detrimental impact on local communities, particularly affecting the more deprived communities of the Central Area.
- 4.2.18 It is important that any new student accommodation that comes forward in the Central Area does not prevent other town centre uses being brought forward. For example, some locations may be preferable for new homes rather than student accommodation. Concentration of student accommodation can also have detrimental impacts on neighbourhoods from a high transient population, although there can be benefits of creating vibrancy.
- 4.2.19 **Employment and retail:** The SCAAP identifies the primacy of central Southend for new retail and office development. The SA finds that the SCAAP should have a beneficial impact on supporting a sustainable economy in the Central Area as well as maintaining its retail role.
- 4.2.20 There is a need to make sure that existing office and business space is not lost in favour of other uses, such as residential or education use, unless suitable new space is available. A quality and flexible office provision needs to be maintained in the town centre. The Central Area is the most sustainable place for high trip generating office uses.

- 4.2.21 Protection of the retail use in the primary and shopping areas is important to maintain the retail role of the town centre and High Street. Too high a proportion of non- A1 retail uses can change the character of a retail area, which could lead to its further decline as a place to shop. However, there can also be benefits from reducing the number of vacant units through temporary retail of other uses.
- 4.2.22 **Leisure, recreation and open space:** The SCAPP polices relating to leisure and recreation should have beneficial impacts on sustainable development from supporting the provision of improved space for leisure and recreation in the Central Area.
- 4.2.23 The SA does note that new seafront and waterfront leisure and recreation development will need to take into account the potential conflict of uses. There will be different demands on the area, from areas of quiet enjoyment of the natural environment to places for active water-sports. For everyone's enjoyment different uses will need to be managed to ensure high quality leisure opportunities for all.
- 4.2.24 There is also the possibility that new development for waterfront tourism and leisure will conflict with the nature conservation interest of the site. This will need to be managed to ensure no harm comes to internationally designated sites.
- 4.2.25 **Sustainable construction and flooding:** The SCAAP has the potential to have some beneficial effects on sustainable development in relation to sustainable construction and the more efficient use of resources.
- 4.2.26 The SA notes the potential for large mixed use and landmark sites proposed have real potential to deliver buildings to exemplar sustainability standards, both in construction and use of resources. Building to high standards can have benefits for the resource use of the individual buildings as well as providing an example of standards that can be achieved. This can help guide the delivery of other development in the Borough, helping guide the way for sustainable construction.
- 4.2.27 **Natural environment:** Policies of the SCAAP are likely to be beneficial in protecting the natural environment, particularly areas of high designated quality with likely beneficial effects on sustainable development.
- 4.2.28 The SCAAP needs to play a role in delivering new urban greenspace in a coordinated way. Policies identify the need to prepare a masterplan for the Urban Park at Queensway, which has the potential to bring the natural environment into the heart of the town. Similarly, any masterplan prepared for Victoria Avenue should include details of the linked green spaces at Victoria Avenue where an overarching strategy may be needed to coordinate piecemeal development to help create high quality, cohesive area of open space.
- 4.2.29 There may also be the potential to include more consistent policy wording on urban greening and the measures this could include. For example, if all Policy Areas should seek to deliver green walls and/or green roofs or only the instances identified.
- 4.2.30 New open space is expected to help provide an alternative for recreation to the foreshore, to help reduce visitor pressure in the designated area, as part of the 'green grid'; details are included in the SCAAP. However, to successfully achieve this there is a need to detail in the SCAAP on how the 'green grid' and new open space will support this.

- 4.2.31 There are several references to lighting strategies in the SCAAP. These can help create a more attractive night-time environment and lighting of 'green grid' links could help improve safety. However, for nocturnal wildlife lighting can create barriers to movement. Therefore, lighting schemes need to take potential impacts into account, using suitable wattage, timings and low level lighting to avoid adverse impacts.
- 4.2.32 **Implementation:** It is evident that no sustainability benefits can be realised if development cannot be implemented. The implementation plan will have to show how the policies and proposals might be secured, and includes details of timescales, targets and delivery partners.
- 4.2.33 The SA identifies that the SCAAP is a succinct plan and clearly sets out the priorities for development in in Policy Area, with a limited number of development strategy policies specific to the Central Area. This is an improvement from earlier versions of the SCAAP that contained many, often overlapping, policies that complicated the principal issues that needed to be considered as part of development that would lead to more sustainable development.

5 Future stages of Sustainability Appraisal

5.1 Next stages of the SA

5.1.1 The SA of the SCAAP will continue to adoption. Each SCAAP consultation stage will be accompanied by an updated SA Report that documents the appraisal process and the decisions that have been made.

5.2 Monitoring

5.2.1 There is a requirement for monitoring the sustainability appraisal arising from the SEA Regulations. The intention is to monitor the impact on the SCAAP for significant environmental effects. Monitoring will need to consider positive and negative impacts, triggering a review if necessary.

5.2.2 The specific requirements of the SEA Regulations on monitoring are to:

“Monitor the significant environmental effects of the implementation...with the purpose of identifying unforeseen adverse effects at an early stage” (Regulation 17(1))

5.2.3 The sustainability framework, Table 1, provides a good starting point for developing targets and indicators for monitoring. As set out in the SEA Regulations there is no need for the SA monitoring to be in isolation from other monitoring measures put in place for the plan. Therefore, it is recommended that monitoring is integrated into LDF and SCAAP specific monitoring.

5.2.4 Monitoring need only begin once the SCAAP has been adopted.

5.2.5 In setting a monitoring framework for the SCAAP the chosen indicators and targets need to be:

- **specific** – in that it relates to policy objectives, indicators reflect what is set out in policy and strategy, and do not appear to be defining requirements that go beyond, or differ from, policy;
- **attributable** – monitoring the indicator must give results that can be directly related to the LDP policies, and should not be issues that are influenced or are more likely to be influenced by matters outside the control of the LDF;
- **measurable** – it must be the case that data or information can realistically be gathered on the indicators, including whether this is possible given time and resources. Indicators could be linked to data already been gathered by other bodies, besides the planning authority;
- **timescale** – the indicator must be capable of being monitored on a regular basis, usually annually, to be an effective part of a monitoring programme.