SUSTAINABILITY APPRAISAL
Non-Technical Summary
Translation available on request

Braille, audio tape & large print available on request
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1. **Introduction**

1.1 The Core Strategy forms part of the Liverpool Local Development Framework – a suite of documents which make up the statutory planning framework for the City. The Core Strategy is the primary development plan document, and deals with matters at the strategic level only. Its main purpose is to identify broad locations for delivering housing and employment land to meet Liverpool’s objectives for sustainable regeneration and growth, together with the associated retail, leisure, community, essential public services and transport provision. It will also address environmental protection issues to ensure the City’s built and natural assets are safeguarded and contribute to the City’s regeneration. The Liverpool Core Strategy looks ahead to at least 2028.

1.2 The Core Strategy Development Plan Document (DPD):
- Defines a vision of what Liverpool will be like for residents and visitors in the future if its policies are implemented
- Identifies a set of objectives to realise this vision
- Sets out a series of policies to guide future growth and development in Liverpool that both complement and integrate with key plans, policies and programmes related to development in the city.

1.3 Local authorities are required to undertake Sustainability Appraisal (SA) on all Development Plan Documents under the Town and Country Planning (Local Development) England) (Amendment) Regulations 2008 to ensure that sustainable development is integrated into spatial planning and into policies developed in the Core Strategy. In June 2004, the Strategic Environmental Assessment (SEA) Regulations came into force, transposing the EU Directive 2001/42/EC on Environmental Assessment of Plans and Programmes into UK law. The SEA Directive requirements are met within the main SA document, and the Non-Technical Summary is also a requirement of the Directive.

1.4 The Sustainability Appraisal identifies the likely significant effects of implementing the Strategic Policies within the Core Strategy against a number of sustainability objectives using a Sustainability Appraisal Framework. Sustainability Appraisal only requires the identification on *significant effects* of implementing the Strategic Policies on achieving sustainable development.
2. **Appraisal of the Core Strategy**

2.1 This Sustainability Appraisal considers the potential sustainability impacts of the implementation of the Strategic Policies within the Core Strategy by using a Sustainability Appraisal Framework. The Framework is made up of objectives, indicators and targets across a range of social, environmental and economic factors, and sets out the current sustainability baseline to compare the current situation with the potential effects of the options if implemented.

2.2 Early work on the Sustainability Appraisal Framework included collecting baseline information to identify the key sustainability issues to be addressed within the Core Strategy, and to also aid the development of the Sustainability Appraisal Objectives against which the policies are to be appraised.

2.3 The key sustainability issues pertinent to Liverpool are:

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<th>Environmental</th>
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<tr>
<td>Protect and enhance the green infrastructure resource</td>
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<td>Sustain and promote biodiversity</td>
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<td>Provide opportunities for sport and recreation</td>
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<td>Prioritise the redevelopment of vacant and derelict land</td>
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<td>Ensure efficient use of resources – water, energy, land</td>
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<td>Avoid and mitigate against the effects of climate change</td>
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<td>Address air quality issues</td>
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<td>Minimise the risk of flooding</td>
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<td>Manage the quantity and nature of waste generated</td>
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<td>Protect the integrity of the Mersey Estuary SPA, SSSI and Ramsar site, and avoid significant effects on all European habitat sites.</td>
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<td>Protect and enhance the City’s unique historic and architectural environment</td>
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<td>Enhance the overall environmental quality of neighbourhoods</td>
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<th>Social</th>
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<td>Address housing market failure and lack of choice</td>
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<td>Create mixed and sustainable communities and provide housing to meet local needs</td>
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<td>Ensure all new development is highly accessible by sustainable modes of transport</td>
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<td>Maximise accessibility to employment, shops, services, education and training</td>
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<td>Tackle deprivation and reducing inequalities in deprivation, especially income,</td>
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employment and health
Reverse population decline and attract more people into the City
Address health issues, reduce health inequalities and increase life expectancy
Ensure an even spatial distribution of high quality vital and viable district and local centres

**Economic**

Support the City Centre as the economic driver of the sub-region
Encourage sustainable economic growth
Provide a sufficient quantity and quality of employment land
Make provision for the sustainable expansion of Liverpool John Lennon Airport
Address severe economic disadvantage in deprived areas
Support the growth of key sectors and key locations, e.g. the Ports of Liverpool and Garston, the City Centre and SIAs
Reduce high levels of worklessness, improve skills levels and maintain levels of employment

**Significant Effects of the Plan**

2.4 Each Strategic Policy was appraised against the eighteen sustainability appraisal objectives, and was given a score of positive (major ++, or minor +), negative (major --, or minor -), unknown (?), or no significant effect (0) together with an explanation for the score.

2.5 Liverpool is a focus for considerable levels of new development relative to other areas within the sub region. Liverpool’s ability to meet the demands placed upon it however will assist the region as a whole to be more sustainable. This therefore has local implications for achieving the environmental sustainability objectives. However, Strategic Policies in the Core Strategy are considered able to reduce the extent of negative effects and also present a number of mitigation measures to avoid negative effects occurring in the first place.

2.6 The negative effects that have been identified in the appraisal are all associated with delivering high levels of growth in the City. Growth of the economy and population
will undoubtedly have some negative impacts on the environment, and cumulatively, the Core Strategy is likely to give rise to the following effects:

- Air pollution through increased traffic levels from an increased population and travel associated with movement of goods
- Noise and light pollution from growth in certain sectors of the economy, and growth of the residential market especially high density developments in the City Centre
- Generation of waste from a larger population and that linked to economic growth
- Climate change effects from an increase in energy consumption and carbon emissions, exacerbation of the heat island effects resulting from high density development especially in the City Centre, loss of permeable land reducing surface water run-off.
- Use of natural resources, including increased use of water resources, and non-renewable energy resources.
- Some possible loss of wildlife where it has established on vacant and derelict land

2.7 The Core Strategy will also result in a large number of beneficial effects, in the main direct and indirect effects linked to improving the quality of life for the City’s residents through enhancing employment opportunities and by creating attractive and sustainable neighbourhoods. There will still be, however, improvements to the environment. Positive effects include:

- Re-use of previously developed land, minimising the need to develop open spaces
- Re-use of existing buildings, contributing to preserving and enhancing local distinctiveness and protecting local heritage assets and minimising waste associated with demolitions
- Safeguarded employment land to support the growth of key employment sectors
- Increased opportunities for employment
- Creation of an attractive city through better quality housing, excellent urban design, and green infrastructure that will attract new residents and increase the population
- Delivery of new, resource-efficient and well-designed housing in areas of need, enhancing sustainability of existing neighbourhoods
• Delivery of a range of housing type to meet the needs of the existing population and attract new residents
• Creation of high quality environments, increased permeability and access to green spaces will improve mental and physical health and well-being, and reduce health inequalities in the city
• Protecting and enhancing green infrastructure will facilitate the movement of wildlife, and provide habitats for wildlife
• Directing retail and leisure investment, and also new community facilities to the network of centres will help sustain the vibrancy of these centres
• Improvements in health and well-being through design of neighbourhoods and places which will encourage active travel, promotes of travel by sustainable transport modes and reducing reliance on using the car which will also help to improve air quality
• Strengthened role of the city centre as the Regional Centre and driver of the sub-regional economy
• Protection and enhancement of the City’s historic built and natural assets
• Reduction of crime, and fear of crime through the design of the built environment, and through regeneration of existing communities
• Reduction in the prevalence of poverty
• Promoting and supporting movement to a low carbon economy
• Remediation of contaminated land
• Increase in renewable energy schemes and so less reliance on non-renewable sources of energy
• Regeneration of the City’s most deprived areas will impact positively on reducing poverty, increasing employment rates, and reducing deprivation and deprivation inequalities.

2.8 It is considered that the majority of the effects of the Strategic Policies will be felt locally, for example, those that will result in increased employment opportunities, enhanced accessibility to shops and services, and improved health and well-being. Some effects associated with growing the economy will felt in the city-region as Liverpool’s economy is the driver of the sub-regional economy. However, it is possible that some of predicted environmental effects could be felt beyond the city boundary but the geographical extent of these is not known.
2.9 It is also considered that the effects of the Core Strategy will be permanent, as they are all linked to the implementation of development proposals. It is not known what levels of growth will have to be accommodated in the city beyond the Plan period and this may place further pressures on the environment. In addition, as the effects are linked to development proposals, the likelihood of the effects occurring is dependent on planning proposals coming forward.

2.10 More detail on the appraisal of the Strategic Policies can be found in Section 7 of the Core Strategy Submission Draft Sustainability Appraisal Report.

3. **Achieving the Sustainability Appraisal Objectives**

3.1 The appraisal of Strategic Policies was done on an individual basis and did not take into account their impact on achieving the sustainability objectives when implemented with other policies in the Plan. This section describes the cumulative effects of all the policies and sets out how the Core Strategy will contribute to achieving the sustainability appraisal objectives.

**Sustainability Appraisal Objective 1 – Natural Resources**

3.2 As a result of the levels of growth to be delivered through the Core Strategy period there inevitably will be some impact on the land resource, demand for energy and water resources. The city has a target of delivering over 40,000 new homes and population projections now suggest that the City’s population may increase by up to 16,000 by the end of the Plan period. Numerous factors could reduce these increases particularly the release of development sites in Green Belt locations by other Merseyside districts versus the economic viability of development on Liverpool’s predominantly brownfield sites.

3.3 In the medium to longer term, and in combination with other Strategic Policies, however, it is considered that these impacts will be kept to a minimum by requiring proposals for new development to incorporate measures to ensure high levels of water and energy efficiency, for major developments to provide at least 10% of their required energy from renewable or low carbon sources, prioritising the reuse of brownfield land, and protecting green infrastructure from inappropriate development.
Sustainability Appraisal Objective 2 – Waste

3.4 There will be an inevitable impact on achieving this objective due to the levels of growth that will be delivered in the City over the period to 2028. Predicted increases in the City’s population along with economic growth will result in an overall increase in the levels of waste generated, both from construction and subsequent day to day activities. The City’s recycling rates have increased significantly over recent years and there has been a move to more sustainable waste management infrastructure and so it is considered that the amount of waste sent to landfill will continue to fall over the long term.

3.5 In addition to this, waste minimisation will also be achieved through prioritising the reuse of previously developed land and buildings, seeking temporary recycling facilities on major demolition or construction projects and requiring proposals for new development to provide safe storage for different types of waste before collection. The Joint Merseyside Waste DPD will also contribute to reducing the amount of waste sent to landfill by moving waste up the waste hierarchy and through the provision of a network of sustainable waste management facilities.

Sustainability Appraisal Objective 3 – Quality of Water

3.6 Without investment in waste treatment infrastructure, there is the potential that further development may increase the risk of effluent escape into aquatic environments. The main wastewater treatment works for Liverpool at Sandon Dock is nearing capacity and without investment, growth could lead to potential environmental effects. In many urban areas, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk. This will be avoided by requiring essential infrastructure to support new development to be in place before development is brought forward. In addition, recent legislation requires proposals for new development to incorporate Sustainable Urban Drainage Systems which will significantly reduce the risk of surface water flooding despite increased levels of development.

3.7 Other potential sources of water pollution could arise from the eutrophication effect of air pollutants, although the scale of this is unknown; and from surface water flooding events. However, the potential of this occurring is reduced by the spatial strategy of the Plan locating the majority of new development in the City Centre and Urban Core,
and by a number of other measures that will reduce air pollution, such as encouraging use of sustainable transport modes, enhancing energy efficiency in new developments and protecting the green infrastructure resource.

**Sustainability Appraisal Objective 4 – Air, Light and Noise Pollution**

3.8 Significant levels of housing and economic growth are likely to result in a decrease in air quality in the City. Increased traffic volumes and energy use will have implications in terms of higher emissions. This could be greatest in the City Centre and Urban Core where there will be high levels of development. However, there are measures contained within the Core Strategy to minimise air pollution and reduce reliance on the car, encouraging active travel by creating an attractive and safe environment, protecting and enhancing green infrastructure and increasing the energy efficiency of new development.

3.9 Noise pollution is likely to be an issue in the short term, during construction phases especially. It may also be a problem for some residents who live close to main roads, due to higher volumes of traffic as a result of growth. Noise, light and air pollution could be an issue for City Centre residents. This will be reduced through requirement for Environmental Impacts and through the use of key design principles in decision making to design out this potential.

**Sustainability Appraisal Objective 5 – Climate Change and Flood Risk**

3.10 Effects associated with growth, climate change and flood risk are well documented, and include an increase in emissions of greenhouse gases, heat island effect, higher rainfall and flooding events. In the short term, adverse impacts could be felt but as proposals for new development are assessed in relation to Core Strategy policies and recent legislation; negative effects associated with growth are likely to be reduced.

3.11 Taking all the Strategic Policies into account, and also national policy, it is likely that over the medium and long term, the predicted negative effects will be substantially reduced. For example, proposals for new development will be required to incorporate energy efficiency measures, use sustainable design and construction techniques, protect and enhance green infrastructure (especially in the City Centre and Urban Core where the majority of new development will be located), maintain a sustainable network of centres, avoid the use of land in flood risk areas, and prioritise the reuse of previously developed land and buildings. There are also requirements for new
developments to incorporate Sustainable Urban Drainage Systems, and to be constructed in line with the Code for Sustainable Homes and BREEAM.

**Sustainability Appraisal Objective 6 – Land and Soil Quality**

3.12 Over the Plan period, it is considered that the effects on soil quality will not be significant. The appraisal has recognised that although climate change can affect soil quality through removal of moisture, wind erosion and increased and more frequent surface water run off, the policies in the Plan will contribute to the City’s ability to adapt to climate change. In addition, despite the large number of homes to be delivered and protection of some 300ha of land for employment, the focus on prioritising the reuse of previously developed land and buildings, and the protection of green infrastructure will help preserve soil quality on undeveloped sites. In addition, contaminated sites are likely to be remediated given the priority on the use of brownfield land. However, in principle the City Council supports the expansion of Liverpool John Lennon Airport which will result in the loss of some Green Belt land at the Oglet in Speke. Development of this land will have significant adverse impacts on soil quality in this particular location.

**Sustainability Appraisal Objective 7 – Cultural, Historic and Archaeological Assets**

3.13 The focus on prioritising the reuse of previously developed land and buildings, and the protection of heritage assets and World Heritage Site, will contribute to preserving Liverpool’s cultural and historic heritage and local distinctiveness. Negative effects could be felt if new development is not sympathetic to its surroundings but this will be avoided or mitigated through strategic policies. In addition, protection and enhancement of green infrastructure includes the protection of the setting of built heritage assets, Historic Parks or Gardens, and important geological sites.

**Sustainability Appraisal Objective 8 – Biodiversity, Species and Habitats**

3.14 The level of development to be delivered in the City, despite the priority to reuse brownfield land, is likely to impact on biodiversity and habitats. It is recognised that some brownfield sites are important habitat sites. However, it is considered that over the longer term, the implementation of the policies on green infrastructure will aid the creation of new habitats within new developments. In the Urban Core and Suburban Areas, the focus will be on providing larger houses with gardens which, despite using more land, will provide habitats for wildlife and help the movement of wildlife across Liverpool. The Core Strategy supports the loss of Green Belt land to facilitate
expansion of the Airport, which could have implications for wildlife, especially those species that use the land as supporting habitat from the Mersey Estuary SPA and Ramsar site. Potential effects have been considered through the Habitat Regulations Assessment, and any proposal (for expansion of the airport) will need to be accompanied by a project-level assessment. In addition, policies on green infrastructure require proposals for new development to contribute to enhancing the green infrastructure resource, including through integrating biodiversity features and habitats. This is particularly emphasised in the policies for the City Centre and Urban Core.

**Sustainability Appraisal Objective 9 – Travel and Sustainable Transport**

3.15 A range of policies in the Plan will reduce the need to travel, encourage the use of sustainable modes of transport, and improve accessibility to a range of day-to-day facilities and services. It is likely that benefits will be felt in the medium to long term but this will depend on whether opportunities for improving sustainable modes of transport, or facilities for encouraging active travel are delivered.

**Sustainability Appraisal Objective 10 – Good Quality, Affordable and Efficient Housing**

3.16 The Core Strategy will improve choice of housing in the City; the approach is largely based on the City's Housing Strategy and will increase the provision of higher value semi-detached and detached houses with gardens. The energy efficiency of new housing stock will be achieved through the requirement for new development to meet the Code for Sustainable Homes, and the application of Building for Life or Lifetime Homes will maximise the sustainability of new housing to meet needs of residents over a number of years. The approach to the provision of affordable housing will be based on the findings of the Strategic Housing Market Assessment, and the detail will be provided in a further development plan document.

**Sustainability Appraisal Objective 11 – Safety, Disorder and Crime**

3.17 A number of policies will contribute to reducing crime and disorder, and the fear of crime, although these will be indirect effects, and it may be in the medium and long term that these benefits will be felt. Urban design, increased job and training opportunities, reuse of vacant buildings, vibrancy of the network of centres and regeneration in general will help increase pride, reduce anti-social behaviour and improve perceptions of safety across the City.
Sustainability Appraisal Objective 12 – Health and Health Inequalities

3.18 A number of policies working together will have a positive impact on addressing the health problems prevalent in Liverpool. Creating attractive environments, through policies on housing, green infrastructure, and urban design will help to encourage residents to walk or cycle to access facilities, however this does depend on the behaviour of individuals and is somewhat beyond the control of the Core Strategy. The likelihood of this occurring will be enhanced through the policies in the Core Strategy. In addition, creation of new jobs, resource-efficient housing and easy access to local facilities, including green infrastructure is likely to have a positive impact on the quality of life of residents and their health and wellbeing. Accessibility will be enhanced through new development and also through the delivery of LTP3 projects.

Sustainability Appraisal Objective 13 – Accessibility of Goods, Services and Amenities

3.19 Liverpool already benefits from a good transport system which enables the vast majority of the City to be highly accessible by most means of transport. By directing community facilities, services and local shops to the network of Local and District Centres, the Core Strategy will maximise accessibility for local residents, as these areas are highly accessible from residential neighbourhoods either by walking or public transport. Protecting and enhancing green infrastructure will ensure that a key community amenity is as accessible as possible.

Sustainability Appraisal Objective 14 – Poverty, Deprivation and Inclusion

3.20 A number of Strategic Policies will contribute to reducing the prevalence of poverty and deprivation in the City. Creating an attractive environment and safeguarding land for employment will attract economic investment, increasing job opportunities. Reducing the need to travel and energy efficient housing will reduce household costs. More specifically, increasing economic inclusion through targeting sections of the City that are the most deprived.

Sustainability Appraisal Objective 15 – Educational Attainment and Lifelong Learning

3.21 Increasing opportunities for lifelong learning and training, and improving educational attainment is an indirect effect of many of the policies in the Plan. Creating good quality, mixed and sustainable communities can have positive effects on people’s aspiration and attitudes towards learning. In addition, attracting economic investment
could lead to a greater number of training placements, especially in growth sectors. There are also links between the natural environment and informal and formal learning. Increasing the population in areas for housing growth will also help sustain local schools.

**Sustainability Appraisal Objective 16 – High and Stable Employment**

3.22 The provision of an appropriate amount and quality of employment land will help to attract economic investment and have a positive effect on employment levels by increasing the number of job opportunities available. Improving educational attainment, widening housing choice (especially increasing higher value homes), and creating an attractive city through urban design and green infrastructure will attract both new residents and new investment. Employment rates will also increase through improving the health and wellbeing of residents so that they are able to work; as discussed above, the Core Strategy will contribute to improved health and wellbeing.

**Sustainability Appraisal Objective 17 – Economic Competitiveness and Productivity**

3.23 Creating an attractive city for economic investment, through provision of employment land, high quality design and good quality housing will attract businesses to Liverpool. Supporting key growth sectors in particular will attract businesses in these sectors, and also businesses that provide related services. In addition, the City is in a unique position, being home to the Airport and Ports and the associated business these bring to the City. Strategic Policies identify specific sectors for the Strategic Investment Areas and businesses will benefit from being clustered together.

**Sustainability Appraisal Objective 18 – Vitality and Viability of Centres**

3.24 Overall, the Core Strategy will have a positive impact on the health of the network of centres across the City. The approach of directing retail, community and leisure facilities into centres will have a considerable beneficial impact on the health of the centres, some of which are in decline. Improving the quality and choice of housing in certain areas will lead to an increased population which will sustain shops and facilities within centres, and reduce the number of vacant units. As discussed above, policies which will help reduce household costs may benefit centres as residents will have more disposable income. The Core Strategy will have a positive effect on the City Centre, and consolidate its recent regeneration.
4. **Amendments to the Core Strategy**

4.1 The Sustainability Appraisal process has resulted in a number of Strategic Policies being amended to improve their sustainability: these are outlined below. Comments have been received on the findings of the sustainability appraisal during the preparation of the Core Strategy, and these have been taken into account when developing Strategic Policies for the Submission Draft. Therefore the Core Strategy already contained policies which seek to mitigate the negative environmental effects of the Strategic Policies concerned with delivering housing and economic growth. There are two policies which have been amended as a direct result of undertaking this appraisal but as discussed above, the comments received on both the Core Strategy and Sustainability Appraisal Reports throughout the Plan preparation has helped shaped the Strategic Policies to maximise their sustainability prior to this appraisal being undertaken. The amendments to the Strategic Policies are detailed in Section 9 of the main Sustainability Appraisal Report.

5. **Monitoring**

5.1 Sustainability Appraisal monitoring for the Core Strategy will be incorporated into the existing monitoring arrangements, and in particular the Annual Monitoring Report prepared for the Local Development Framework.

5.2 The Annual Monitoring Report already monitors a number of indicators that are linked to the Sustainability Appraisal, which have been included in the AMR as a result of appraising earlier versions of the Core Strategy.

5.3 Any unforeseen adverse effects arising from implementation of the policies will be highlighted in the Annual Monitoring Report, and recommendations made as to the need for revisions to the Core Strategy.

6. **Consultation**

6.1 Under current regulations, the Core Strategy Submission draft and the Sustainability Appraisal Report (and other supporting documents) will be available for public comment for a six-week period.
6.2 At this stage, consultees are invited to consider both the Submission Draft Core Strategy and accompanying Sustainability Appraisal Report. Representations be made on the soundness of the Core Strategy, and may take into account whether the development plan document is:

- founded on a robust and credible evidence base
- justified - the most appropriate strategy when considered against the reasonable alternatives
- effective - deliverable, flexible and able to be monitored
- consistent with national policy.

6.3 Where representations are received, and in the light of those, the City Council wishes to suggest to the Inspector that changes be made to the Core Strategy, these changes will need to be subject to a Sustainability Appraisal only where they are significant changes. Changes which are not significant will not require further sustainability appraisal work.

6.4 When the Core Strategy is submitted to Government (Submission Stage), the Council is required to also submit the Sustainability Appraisal Report and a statement which sets out who has been consulted during plan preparation, how they have been involved, and a summary of the main issues raised and how these have been taken into account in the document.