

September 2008

**Sustainable Development Research Network**

**Spatial Planning Workstream**

**Issues for the practice of  
sustainability appraisal in spatial  
planning - a review**

**FINAL WORKSTREAM REPORT**

Prepared for the  
Sustainable Development Research Network  
by  
Land Use Consultants &  
The Royal Town Planning Institute



**RTPI**

mediation of space · making of place

**SDRN**

Sustainable Development Research Network



**SUSTAINABLE DEVELOPMENT  
RESEARCH NETWORK**

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# SUMMARY OF KEY FINDINGS

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## THE RESEARCH

1. The objective of this workstream was to explore the role of Sustainability Appraisal (SA) in the delivery of sustainable development outcomes through the spatial planning process.
2. Government guidance has promoted SA as having an important role in informing the plan-making process, and helping to deliver more sustainable development outcomes. As such, it has come under scrutiny as part of ongoing assessment and reform of the planning system in England and Wales.
3. The workstream therefore undertook to review:
  - **Emerging good practice in the use of SA in spatial planning.**
  - **The value that SA adds to the spatial planning process and the sustainability of development outcomes.**
  - **The challenges and problems raised by current practice and research.**
4. This review was based on literature research and consultation.

## KEY FINDINGS

5. A review of literature and consultation with spatial planning practitioners, policy-makers and researchers led to recommendations for areas of further research which fall into three key areas:

### **Making the process more practitioner-friendly**

The difficulties encountered with different elements of undertaking SAs such as evidence gathering, testing alternatives, determining significance etc, would all benefit from examination to determine how best to tackle these aspects of the process.

### **Evaluating the impact of SA**

The second area involves the determination of the extent to which the SA process in its current use and form is actually affecting policy formulation and decision-making. There is evidence of areas where SA recommendations are making a real difference to development plan policies, but equally there is evidence to suggest that recommendations are often ignored.

### **Determining actions to build on strengths and resolve weaknesses of SA**

The third area is based on a requirement to determine what needs to be done to tackle those areas which are not working; to more clearly define the role of SA (and Strategic Environmental Assessment – SEA) and strengthen the areas where it can actually make a difference. The role of joint-working between administrative authorities when undertaking appraisals also appears to be an area which has not

been explored in depth. While good appraisals will consider the implications of the plan and forces influencing it beyond this boundary, the opportunities for exploring the potential for joint-working between local authorities, or SA's which are set at different scales do not appear to have been fully explored.

## **IMPLICATIONS FOR POLICY AND PRACTICE**

6. Findings from this workstream highlight the need for joint-working between spatial planning practitioners, policy-makers, and members of the research community. While spatial planning undoubtedly makes a significant contribution to the promotion and delivery of sustainable development, it is often assumed that the planning system can be used to tackle all sustainability problems when of course, it can't. However, sharpening some of the tools which are involved in the spatial planning process (such as SA) can help to deliver more sustainable spatial plan outcomes. Some of the recommendations highlighted in this report include areas where much work is already being undertaken, and there are several research programmes already underway which have been discussed in this review. There is however still a significant need for further research to develop policy appraisal approaches which have a more influential role in the spatial planning process. Examination of the priorities identified below will in some cases require changes to everyday practices, while others will necessitate broader policy changes (e.g. consideration of cross-boundary working).

## **RECOMMENDED PRIORITIES FOR FURTHER RESEARCH**

7. Based on suggestions identified through the literature review and workshop findings, the following overarching priorities for further research on the subject have been identified:
  - **Identification and dissemination of SA best practice to practitioners** (i.e. what is working, what is not, how to apply skills to make SAs more robust).
  - **The identification and use of the evidence base to inform SA and policy formulation** (including the potential for standardised data sets, application of evidence, and the use of the capacity approach, such as environmental limits).
  - **Evaluating the extent to which options and alternatives are identified and usefully tested through SA.**
  - **Developing tools and techniques for forecasting sustainability trends and outcomes into the future** (including the prediction and use of future baseline conditions).
  - **Developing options for how to engage with stakeholders who are outside the planning system.**
  - **Reviewing the usefulness and appropriateness of incorporating SEA into SA in view of the aims and objectives of the SEA Directive.**

- **Evaluating the actual and perceived impact of SA on policy formation.**
- **Evaluating the actual and perceived impact of SA on policy outcomes.**
- **Assessing the pros and cons of the integration of SA with other assessment procedures.**
- **Examination of the ‘weighting’ given to economic, environmental, and social effects in appraisals** (including how this has influenced the spatial strategy and policies being appraised).
- **Consideration of the most appropriate geographical scales for SA to be undertaken.** Including –
  - Undertaking SA across administrative boundaries below the regional level; and
  - The role and implications of appraisal of national policy statements.

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## LIST OF ACRONYMS

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<b>AA</b>	Appropriate Assessment
<b>AMR</b>	Annual Monitoring Report
<b>CPRE</b>	Campaign to Protect Rural England
<b>DETR</b>	Department of Environment, Transport and the Regions
<b>DoE</b>	Department of the Environment
<b>DPD</b>	Development Plan Document
<b>DWP</b>	Department for Work and Pensions
<b>EIA</b>	Environmental Impact Assessment
<b>EQiA</b>	Equalities Impact Assessment
<b>FoE</b>	Friends of the Earth
<b>HIA</b>	Health Impact Assessment
<b>IEEM</b>	Institute of Ecology and Environmental Management
<b>IEMA</b>	Institute of Environmental Management and Assessment
<b>LDD</b>	Local Development Document
<b>LDF</b>	Local Development Framework
<b>LUC</b>	Land Use Consultants
<b>ODPM</b>	Office of the Deputy Prime Minister
<b>OMS</b>	Offshore Marine Site
<b>P&amp;CP</b>	Planning and Compulsory Purchase (Act 2004)
<b>PAS</b>	Planning Advisory Service
<b>PCT</b>	Primary Care Trust
<b>PPG</b>	Planning Policy Guidance
<b>PPS</b>	Planning Policy Statement
<b>RSPB</b>	Royal Society for the Protection of Birds
<b>RSS</b>	Regional Spatial Strategies

<b>RTPI</b>	Royal Town Planning Institute
<b>SA</b>	Sustainability Appraisal
<b>SAC</b>	Special Area of Conservation
<b>SDRN</b>	Sustainable Development Research Network
<b>SEA</b>	Strategic Environmental Assessment
<b>SPA</b>	Special Protection Area
<b>SPD</b>	Supplementary Planning Document
<b>SPiP</b>	Spatial Plans in Practice
<b>WWF</b>	World Wildlife Fund



# **I. THE SPATIAL PLANNING WORKSTREAM**

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## **INTRODUCTION**

- I.1. Defra commissioned the third phase of the Sustainable Development Research Network (SDRN) in 2006. Funded by Defra and the Department for Transport, SDRN links the world of academic research with that of government, so that policy-making is consistently informed by the most up-to-date sustainable development research available. It produces a fortnightly newsletter, holds events, including an Annual Conference, and produces publications which are valued by a wide community of users.
- I.2. As part of this remit, SDRN aims to improve the integration of members of the sustainable development research community and those who put research into practice. In this third phase of the network SDRN are running four 'research into practice' workstreams alongside other SDRN activities. These four workstreams are Sustainable Transport; Spatial Planning; Business and Resource Efficiency; and Engineering and Sustainable Development.
- I.3. Land Use Consultants (LUC) and the Royal Town Planning Institute (RTPI) were commissioned in 2006 to jointly undertake the Spatial Planning workstream.

## **WORKSTREAM OBJECTIVES**

- I.4. The aim of the workstream was to explore the role of Sustainability Appraisal in improving the delivery of sustainable development outcomes through the spatial planning process, to review what is known about current practice, and to establish gaps in existing research.
- I.5. Government guidance has promoted SA as having an important role in informing the plan-making process, and helping to deliver more sustainable development outcomes.
- I.6. As such, it has come under scrutiny as part of ongoing assessment and reform of the planning system in England and Wales. It has, for instance, been challenged as being overly mechanistic and unresponsive to the full range of sustainability objectives. Recent research, such as that undertaken by the Department for Communities and Local Government as part of their 'Spatial Plans in Practice' (SPiP) project has highlighted some of the issues surrounding planning practitioners' experience of undertaking and using SA in the policy development process.
- I.7. The workstream therefore undertook to review:
  - Emerging good practice in the use of SA in spatial planning.
  - The value that SA adds to the spatial planning process and the sustainability of development outcomes.
  - The challenges and problems raised by current practice and research.

The review was based on a literature research and consultation.

## **STRUCTURE OF THIS REPORT**

- I.8. This Report constitutes the final stage of the workstream, and is structured to correspond with the stages and tasks undertaken for the workstream as follows:

### **Literature Review**

- I.9. In order to determine the extent of existing research on SA we conducted a brief review of published research. This allowed the identification of several key themes within which common issues had been identified. An initial set of recommendations for further research were outlined at this stage.

### **Workshop Findings**

- I.10. The themes from the literature review and issues within them were used to structure a workshop with planning and research practitioners earlier this year. The findings from the workshop, including areas for further research identified are set out in this section.

### **Conclusions and recommendations for further review**

- I.11. This section brings together the workstream findings and suggests what implications these have for policy and practice. It also provides a broad set of recommended areas for further research.

## 2. LITERATURE REVIEW

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### PARAMETERS OF THE LITERATURE REVIEW

- 2.1. The 2004 Planning and Compulsory Purchase Act (the P&CP Act 2004) introduced a series of changes to the spatial planning system in England, in particular the form and structure of the development plan system. Section 39 (2) of the Act introduced the requirement for sustainability appraisal for parts of the new development plan system, including revisions of Regional Spatial Strategies (RSS), and for new or revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).
- 2.2. The purpose of Sustainability Appraisal (SA) is to promote sustainable development in plan preparation by integrating sustainability considerations into the preparation and adoption of plans.
- 2.3. A national framework to promote SA of local plans was originally outlined in an early draft of Planning Policy Guidance 12 (DETR, 1999, 4.14 – 4.20). PPG 12 advised local authorities that sustainable development is not restricted to environmental considerations alone. The guidance stated that existing methodologies for environmental appraisal can be adapted to incorporate the wider economic and social issues identified in the government's national sustainability objectives. Before PPG 12 introduced SA, appraisal had focused primarily on environmental impacts. While PPG 12 recommended several key appraisal principles for integrating environmental, social and economic issues, it provided only limited methodological guidance on the mechanics of SA (Benson & Jordan, 2004, p.270). There was also no formal requirement to perform the additional aspects of appraisal outlined in PPG 12. This meant that before 2004 no standard 'model' of best practice for carrying out SA was available to practitioners.
- 2.4. European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment—the 'Strategic Environmental Assessment Directive' (CEC, 2001) – (SEA Directive) came into effect on 21 July 2004 and applies to plans and programmes whose preparation starts after that date.
- 2.5. When preparing revisions of RSS or new and revised DPDs and SPDs, Regional Planning Bodies and Local Authorities must also conduct an environmental assessment in accordance with the requirements of European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the Strategic Environmental Assessment or 'SEA Directive'). Transposed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations').
- 2.6. The objective of Strategic Environmental Assessment (SEA), as defined in Article 1 of the SEA Directive is '*to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development*'.

- 2.7. SEA was introduced into UK law through regulations for England, Wales, Scotland and Northern Ireland (the English regulations also cover UK-wide plans and programmes). Plan-making authorities were to be responsible for ensuring SEA was properly carried out. All of the regulations closely follow the requirements of the SEA Directive, but they specify the different environmental authorities which must be consulted in each administration, and make provisions for minimum times for consultation. In Scotland, the Environmental Assessment (Scotland) Act 2005 widens the range of strategic actions to which SEA applies beyond those in the Directive (Therivel & Walsh, 2006).
- 2.8. Practical guidance on SEA was published by the then ODPM (now the Department for Communities and Local Government), and the administrations in Wales, Scotland, and Northern Ireland, to help the plan-making authorities understand their obligations (ODPM *et al*, 2005). This was to provide the basis for a suite of guidance from government on how to undertake specific elements of SEA. There are currently around thirty different guidance documents for SEA and SA in the UK, from general guidance to ensure compliance with the Directive, to guidance focussing on specific topics or elements of SEA or SA.
- 2.9. The 2005 Office of the Deputy Prime Minister (ODPM) guidance on sustainability appraisal ('SA Guidance'), which is based on the practical guide to SEA, explains the difference between environmental assessments required under the SEA Directive and SA of development plans as required by the UK Government. There are many parallels but also some differences, and the guidance clearly shows how assessment to comply with the SEA Directive can be integrated with current practice on SA. Simply put, SA includes a wider range of considerations, extending to social and economic impacts of plans, whereas SEA is more focussed on environmental impacts. SA is also an objective-led process in comparison to SEA, which focuses more on impacts. The SA guidance describes how it is possible to satisfy both requirements through a single appraisal process undertaking a joint SA/SEA. This joint process is referred to in this process as 'SA'.
- 2.10. Four years after SA was made a statutory requirement in plan-making, it is currently under scrutiny as part of analysis of the Planning and Compulsory Purchase Act 2004, and reviews of the implementation of the SEA Directive. The following provide a current context for this review:
- Department for Communities and Local Government recently reported to the European Parliament and Council on the application and effectiveness of the SEA Directive.
  - The Planning White Paper (Communities and Local Government, 2007), published in May 2007, made a number of general proposals to streamline plan production. This was developed into a consultation paper (Communities and Local Government, 2007a), including a draft amendment to the Local Development regulations and a draft replacement for PPS12. A new version of PPS12 was published on 4<sup>th</sup> June 2008.
  - The Planning Bill, published in November 2007, which introduced a requirement for Ministers to set national priorities for infrastructure, also

states that Ministers will be under a duty carry out an appraisal of their policies' sustainability.

- 2.11. In November 2007 the Department for Communities and Local Government published a consultation document on the creation of 'Strong, Safe and Prosperous Communities' (Communities and Local Government, 2007b), which provides draft guidance to local authorities and their partners on creating strong safe and prosperous communities, specifically relating to new legislation introduced in the Local Government and Public Involvement in Health Act 2007. The guidance covers Local Strategic Partnerships, Sustainable Community Strategies, the new duty to involve communities, Local Area Agreements, the revised best value regime and commissioning. The document notes that SEA, and therefore SA may be required for certain Sustainable Community Strategies. Community Strategies had previously been identified as potentially requiring SEA in the indicative list of plans subject to the SEA Directive, within the 'Practical Guide to SEA' (ODPM et al, 2005).
- 2.12. Much of the research on SA (in contrast to much wider research on Strategic Environmental Assessment) has resulted from appraisal of SA's effectiveness as a planning tool within the reformed planning system under the P&CP Act 2004. There is also significant research and commentary on methods and procedures for undertaking SA, as well as the use of SA as an appraisal tool for different types of plans and policies within and outside of the spatial planning system.
- 2.13. Literature and research was identified using keyword searches of academic journals, and practitioner journals (i.e. *Planning*, *Town & Country Planning*, *The Environmentalist*). Research undertaken by Government and other institutions/bodies has also been found using online searches. Key academic institutions were contacted and relevant research referred to as was available at the time of the review. Presentations and discussion from the spatial planning session at the SDRN Annual Conference 2007, and comments on previous drafts of the literature review have also been considered. The review focuses on research undertaken since the implementation of the 2001 SEA Directive, but also considers research and discussion undertaken since PPG 12 introduced a national framework to promote SA of local plans in 1999. This review was undertaken in autumn 2007 and does not include research undertaken since that time. However some of the key references have been updated, such as important changes in legislation.
- 2.14. There is significant research being undertaken applying SA and SEA frameworks to the assessment of policies and plans other than those concerned with spatial planning. These have not been included in this review as it focuses on development plans only. The former is worth noting however, as cumulatively it contributes to the development of SA/SEA as a process. Again, alternative methods have not been examined in detail in this review, but alternative methods for evaluation or appraisal of policy could be a useful focus for further research.

## **Review Structure: Seven themes affecting the use and effectiveness of SA**

2.15. From the initial review of research several key themes concerning the use and effectiveness of SA have emerged:

- 1. Delivery of Sustainable Outcomes**
- 2. Skills and Training**
- 3. The Evidence Base**
- 4. Effective Consultation**
- 5. Assessing Significance**
- 6. Integration With Other Assessment Procedures**
- 7. Effective use of SA in Decision-making**

This report has been structured around each of these themes, with discussion of the issues identified within them set out below.

### **I. DELIVERY OF SUSTAINABLE OUTCOMES**

- 2.16. The reformed planning system, introduced under the P&CP Act 2004, was designed to have sustainable development at its core. SA's purpose is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Local Development Frameworks (LDFs) and Regional Spatial Strategies (RSS). The potential for SA to successfully integrate these elements was recognised before SA was made a statutory requirement (Short et. al, 2004) and is still recognised and discussed in recent research (e.g. PAS, 2006; Rydin, 2006; Communities and Local Government, 2007); "*SA offers an opportunity for explicit and reasonably transparent consideration of the different streams of Sustainable Development, for this to become imbedded in plan-making*" (Rydin, 2006).
- 2.17. Morrison-Saunders & Fischer (2006) note that the integration of the different streams of sustainable development has become a principle of international generic guidance for good quality SEA practice, and is also increasingly a feature of SEA and SA guidance, citing authors who have examined how outcomes can be achieved through impact assessment that is economically, socially, and environmentally sustainable (p.22).
- 2.18. Therivel and Walsh (2006) surveyed 410 English and Welsh Authorities in their study on the SEA Directive in the UK. Of the 210 replies received, 75% stated that SEA/SA had improved the plan's sustainability and planner's awareness of sustainability. There are concerns however, that the potential for SA to have this effect on plans is not always realised, with some researchers concerned that some of the SAs being carried out are not contributing to sustainable outcomes (Benson & Jordan, 2004).
- 2.19. Some authors relate this to a need to strike a balance between the different streams of sustainable development in order to deliver 'sustainable' outcomes. However, this

is not the role of SA itself, which should identify sustainability effects and allow plan makers to make decisions based on effective understanding of the sustainability consequences of those decisions. Rydin (2006) discusses the way in which the different streams of sustainable development are considered through SA. She notes that SA has come under the scrutiny of environmentalists in particular, who express concerns that the environment has been demoted in favour of economic and social factors in the integration of SEA and SA approaches.

- 2.20. Morrison-Saunders & Fischer (2006) examined whether the trend towards integration of environmental, social and economic factors within EIA and SEA was leading to a 'downgrading' of environmental considerations in assessment and decision-making processes. They identified several authors who expressed such concerns, such as Kidd & Fisher (2005), and Dovers (2002) who asserted bluntly that *"environmental and social issues matter, until it matters economically"*. Therivel (2004, p.85) also notes that environmentalists would argue that sustainability assessment: *"increases the risk that, beneath the comforting rhetoric of integration and 'joining-up', environmental concerns continue to be marginalised because economic interests continue to have the institutional power"*. Therivel (2004) goes on to discuss the different arguments for defining what constitutes 'environmental' impacts and 'sustainability' impacts, and how to incorporate them into assessment. This discussion is beyond the remit of this review but illustrates the breadth of views and approaches to the integration of environmental, social and economic impacts through assessment.
- 2.21. Cowell's (2004) commentary on the impact of the P&CP Act 2004 on planning suggests that in fact it is the economic impacts which need closer analysis through appraisals; *"While environmental analyses have been pushed to ever greater refinement by the institutionalised presumptions of the planning system, what is often needed is increased legitimacy for unpacking the economic claims of growth, employment and regeneration. While the inevitable subjectivities, weaknesses and redistributive implications of, say, environmental capacity studies have – rightly – been criticised, the principle of symmetry implies allowing similar assessment of the plausibility, distributional fairness and potential malleability of economic benefits"* (p. 31). He suggests that this could be one positive outcome of the shift from environmental assessment to sustainability appraisal at regional level.
- 2.22. The issue of whether economic issues outweigh environmental and social ones occurs as a result of balancing impacts against one another which are not necessarily quantifiable. This is also related to the issue of assessing the significance of impacts, discussed below. The SDRN Rapid Research and Evidence Review on 'Emerging methods for Sustainability Valuation and Appraisal' (Stagl, 2006) discusses different methods for approaching these non-monetary impacts. However, some of the methods discussed in the review would be costly and time-consuming to implement.
- 2.23. Despite aiming to integrate the different streams of sustainable development SA has also been criticised for not being adequately integrated into the plan-making process (Benson & Jordan, 2004), creating a separate and parallel process to the main policy development pathway; *"Sustainable development is a constant objective of every spatial plan, not something separate against which the plan objectives need to be compared...the appraisal framework unhelpfully requires an artificial distinction between the two"* (Broad,

- 2006). As recognised by Short *et. al.* (2004), the principles of sustainable development should be integral to plan-making whether a separate appraisal tool is used or not. They note that the relationship between sustainable development and planning and appraisal must be strengthened if it is expected to stimulate any real change.
- 2.24. Despite some criticism of the current effectiveness of SA, Communities and Local Government (2007c) found there was evidence that SA has influenced policies and DPDs. This supports findings by Therivel and Walsh (2006), who found only 18% of respondents had said that SEA had not led to any changes in the plan assessed, compared to 46% who said that SEA had resulted in some modifications to the plan. However, the perceived value of SA was recognised as a concern for many authorities who participated in the Department for Communities and Local Government research, who felt that *“the effort required for SA was not commensurate with the impact on policy making and effectiveness”* (p.50). This may be because many DPDs do not show how the SA has influenced them. Therivel and Walsh also had a mixed response on this issue, with 47% of respondents agreeing that SEA was an effective use of time and resources compared with 26% who disagreed.
- 2.25. It appears there has been little research undertaken on the extent to which SA has resulted in ‘sustainable’ policies. In a report for the Campaign to Protect Rural England (CPRE), WWF and Friends of the Earth (FoE) England, Levett-Therivel (2007) discuss the role of SA in delivering sustainable development outcomes at the regional level. They suggest that in practice SAs have a limited ‘tweaking’ role at the regional level. This is blamed on a number of factors including the relatively unclear requirements for ensuring SA findings influence policy. Decision makers are *“merely required to take account of the environmental [SA] report and the consultation findings on that report”* (p.59). This is contrary to the requirements of other forms of assessment, such as Appropriate Assessment (AA), which has much more influence; *“[AA] essentially leads the planning process by setting such tight requirements on conditions under which plans would be permitted to have significant effects on Special Protection Areas and Special Areas of Conservation that it is much easier to write the plans so as to avoid such impacts in the first place”*. A lack of quantifiable targets and the fact that SA is a devolved responsibility are also blamed in the report.
- 2.26. A key message from the literature review, is that *“...to date, the emphasis in SA has been firmly on getting it done, on time, to a level that will not result in a legal challenge. However there is clearly a difference between legally-compliant SA and effective SA; the former does not guarantee the latter”* (p. 59). It does not appear that a similar research exercise has been undertaken at the local level.
- 2.27. In summary, the potential for SA to help deliver sustainable outcomes though planning is clear and there is evidence showing that this has been achieved, but there are also several areas in need of improvement. Some research and commentary suggests that existing political structures and methodological approaches used may be presenting barriers to the development of this potential.

## 2. SKILLS AND TRAINING

- 2.28. In 2005, the then ODPM published guidance on SA setting out the requirements and recommending approaches to ensure compliance with the SEA Directive and P&CP Act 2004 (“SA Guidance”). Before the publication of this guidance, and the ‘Practical Guide to SEA’ (ODPM et al, 2005), practitioners were relying on a number of different documents providing a range of methodologies for environmental appraisal (e.g. DOE, 1993; DETR, 1999; DETR, 2000). The lack of a clear model to conform to was found to be resulting in a variation in the quality of appraisal and SA reports (Therivel, 2002; Benson & Jordan, 2004). As practitioners got to grips with the SA Guidance, there were notable differences in approaches taken. It is clear that the right skills and training were necessary to build an SEA culture in responsible authorities (Curphy, 2005). Harridge (2005) also suggests that SA cannot be carried out effectively without additional resources, skills, and training.

### Using and Interpreting SA Guidance

- 2.29. Throughout the literature, between 2001 and 2007, common issues related to the interpretation of requirements and recommended methodologies in the ODPM and other SA Guidance can be identified. Broad (2006) expressed concern that practitioners were having problems putting the SA Guidance and application of SA into effect. He noted that the issues practitioners had identified (subjectivity, resource consumption, large & overly technical reports) were “*too widespread to be dismissed*”.
- 2.30. For example, developing a sound evidence base to support SA often results in a large amount of data being gathered at early stages, with a lack of understanding of how to apply this usefully throughout the appraisal process (PAS, 2006). The use of broad and numerous indicators and SA Objectives to inform SA frameworks, which often results in a lack of focussed application to the assessment of policies and alternatives, was also highlighted as an issue with practitioners (PAS, 2006). Other inconsistencies in approach highlighted include:
- a lack of consistent consideration of cumulative effects (e.g. Cooper & Sheate, 2004; PAS, 2006; Communities and Local Government, 2007c),
  - judging of the significance of effects (e.g. PAS, 2006), and
  - dealing with subjectivity (Benson & Jordan, 2004; Harridge, 2005; Broad 2006; and Communities and Local Government, 2007c).

While the SA Guidance provides an important guide to undertaking SA, it seems that the nature of the process itself is so heavily based on the professional interpretation of practitioners that the quality of appraisals can differ significantly. This is particularly a problem where the validation of appraisals is given little or no priority (Benson & Jordan, 2004). Issues of significance and subjectivity are discussed in more detail below.

- 2.31. The dissemination of best practice and skills between practitioners is a good way to share experiences and improve skills. There are currently several initiatives which promote this through online resources and joint-working initiatives.
- 2.32. Suggested methods for approaching many of these issues are outlined in the existing SA Guidance. It is important to establish what the barriers to the successful implementation of existing proposed methodologies and approaches to SA are, and which aspects require further research.

### **Using Consultants**

- 2.33. Consultants are often used by planning authorities to help with the appraisal process in a number of ways:
  - by employing them to take responsibility for SA of Local Development Documents,
  - to help simplify the process and act as advisor,
  - as a 'critical friend' scrutinising in-house work,
  - to train staff or help build capacity in the in-house team.

There are obvious benefits for authorities in using consultants, such as provision of a continuous stream of input to the policy making process, with good relationships and iteration at the various stages, in addition to a more objective and rigorous approach (Communities and Local Government, 2007c). Consultants are also often experienced in undertaking impact assessments; whereas planners may be more experienced in reviewing such assessments. However, the Planning Advisory Service, in their LDF Learning and Dissemination project, found that their pilot authorities reported several disadvantages of using consultants. Issues reported include confusion in terms of the appraisal methodologies used, misunderstanding of issues, and reports not being provided early enough to influence decisions (PAS, 2006). The PAS recommend that authorities should undertake SAs themselves, with guidance and training from consultants. Using consultants has implication for the skills of local/regional authority practitioners unless they are being employed in a training or guidance capacity.

### **Resources**

- 2.34. There appears to be a logical connection between the extent of practitioner's skills and means to apply them to the SA process, and the criticisms of existing SA methodologies and practice. SA is currently a resource-intensive process in terms of time inputs and resulting costs. There is widespread agreement that effective appraisal should begin at plan inception. This, coupled with the need for a thorough appraisal of policies and alternatives grounded in a sound evidence base often leads to lengthy reports. Also, the hierarchy of development plans at the regional and local level and the current requirement to undertake SAs at several levels can result in repetition of work and information (e.g. reviews of national level plans and programmes).

- 2.35. This combination of issues has resulted in a negative attitude towards SA amongst many practitioners, evident primarily in practitioner journal articles (e.g. Harridge, 2005; Curphy, 2005; Broad, 2006). This has negative implications for the perceived value of SA as a process; with many feeling that the effort required for SA is “*not commensurate with the impact on policy-making and effectiveness*” (Communities and Local Government, 2007c: 50). A lengthy and time-consuming process can also result in the focus being on getting appraisals done quickly, to a ‘suitable’ standard to ensure they pass the tests of soundness, rather than to ensure an effective appraisal (Levett-Therivel, 2007).
- 2.36. The Planning White Paper (Communities and Local Government, 2007) and subsequent consultation document on Streamlining Local Development Frameworks (Communities and Local Government, 2007a) recognised the need to streamline the use of SAs by proposing that there should not be a blanket requirement for supplementary planning documents (SPDs) to be subject to SA. They suggested that SPDs should only have SA where they have significant social, economic or environmental impacts which have not been covered in the appraisal of higher level policy. This has been taken forward in the newly published PPS12, which states that “*Sustainability appraisal must be proportionate to the plan in question. It should not repeat the appraisal of higher level policy*” (Communities and Local Government, 2008, para 4.42) and is also part of proposals set out in the Planning Bill, which is still subject to parliamentary proceedings. The extent of comments on the resource-intensity of the SA process suggests that this ‘streamlining’ will be a welcome start to reducing repetition in SA, but more measures will be needed to reduce the extent of resources required to undertake appraisals.
- 2.37. The need for more and better skills and training for practitioners was identified in 2005 and is also recognised in the most recent research (e.g. Communities and Local Government, 2007c). Four years since SA was made a statutory part of plan-making lessons are understandably still being learnt. However, it is clear that there is a need for significant changes in attitude and approach by planners in order to successfully integrate SEA and SA into plan making (Harridge, 2005). It is not clear whether there is actually a skills gap or just a lack of resources to develop and implement the existing skills of practitioners.

### **3. THE EVIDENCE BASE**

- 2.38. Evidence is a fundamental element of the SA process, as it provides a basis on which to measure change and set up a robust sustainability framework (Communities and Local Government, 2007c). The use of evidence in SA is one of the key issues identified throughout the literature. A lack of baseline information was cited as a barrier to effective SA by Therivel in an analysis of six pilot planning authorities as early as 2002. One of the key aims of the P&CP Act 2004 was to make the planning process more transparent and accountable. In SA terms, this means ensuring that decisions made are justified in SA reports, and founded on a robust evidence base. While most agree that a sound evidence base is integral to an effective and accurate SA (e.g. Harridge, 2005; Communities and Local Government, 2007c), it raises issues about the most appropriate means for the gathering, interpretation and application of evidence throughout the process.

## **How evidence is used in SA**

- 2.39. The way in which evidence is used in SA is linked to skills, as discussed above. The PAS (2006) found that the pilot local authorities felt that too much evidence is gathered at the scoping stage without the skills to apply it meaningfully to decision-making. This can lead to the development of an SA framework which includes broad or generic objectives which are not locationally specific.
- 2.40. Defining the baseline situation against which to assess impacts has also been the subject of discussion. LUC's (2007) research into the concept of environmental capacity and its application in decision-making notes that SA is concerned with promoting an integrated approach to sustainable development, covering social, environmental and economic issues, but fails to reflect the foundational and irreplaceable nature of many aspects of the environment; *"rather than identifying thresholds or limits to development, [SA's] purpose is to report on whether development proposals will move towards or away from environmental (amongst other) objectives...of itself therefore, SA does not represent a tool for ensuring that thresholds are not breached...The environmental capacity approach would help to ensure SA can be undertaken in better accordance with the SEA Directive"* (p.9). The Defra Ecosystems project (closely linked to the environmental capacity approach) proposes that if the value of ecosystems goods and services to be expressed in robust ways through the ecosystems approach, it could form an essential element of SA (Haines-Young and Potschin, 2007). Cowell (2004) found that while some environmental capacity studies had been rightly criticised, the principle of synergising the different types of baseline information from which to measure effects is essential.

## **Using SA as the evidence base for the rest of the LDF**

- 2.41. While there are several issues identified concerning the use of evidence when undertaking SAs, the SA findings and recommendations are designed to provide evidence themselves for the development of the LDF. Communities and Local Government (2007c) found that SA is a useful and valuable source of evidence for the development of the LDF, and that it can be useful to identify the need for further assessment (such as green infrastructure strategies). SAs should also be linked to Annual Monitoring Reports, discussed in more detail below.
- 2.42. It is clear that an accurate and relevant evidence base is key to getting the foundation of the SA framework right, and providing a basis from which to measure effects. There is clearly a need to explore the best types of evidence to define and measure impacts from.

## **4. EFFECTIVE CONSULTATION**

- 2.43. The P&CP Act 2004 included, in its suite of changes to the planning system, a renewed emphasis on consultation. SA Scoping Reports are subject to consultation, and then SA Reports are issued for consultation alongside each draft of the DPD (i.e. Preferred Options, and Submission, with policy guidance suggesting this should be done at the Issues and Options stage as well).
- 2.44. Current SA methodologies have been criticised for discouraging public engagement in the SA process and plan-making process generally. SA Reports are often lengthy

documents. Furthermore, the language used in reports, which is often overly technical, has been blamed for putting people off reading and commenting on SA reports as they consider them to be inaccessible (PAS, 2006). This is contrary to the need for transparency in the SA Process. The SA Guidance, and various articles (e.g. Ross, 2007) make suggestions for improving the accessibility of the SA process for practitioners. Apart from ensuring transparent methodologies (Harridge, 2005; Communities and Local Government, 2007c), improving non-technical summaries is one suggested approach. In practice, such summaries are often considered to be overly technical, written at the last minute rather than forming stand alone pieces which clearly set out the predicted significant impacts of the plan or programme. PAS (2006) concludes on this matter that “*the general principle should be to present SA findings in user-friendly formats which facilitate their use for communicating the impacts of policy alternatives*” (p.8).

- 2.45. Different approaches to engaging the public in the SA and plan-making processes have been tried by some local authorities; for example North Yorkshire County Council developed an approach whereby summary SA information was combined into their Issues and Options paper in the form of ‘data sheets’. The data sheets presented the effects of different policy options alongside the planner’s explanation of the policy options and a question to consultees on which approach they would prefer (North Yorkshire County Council, 2005). Techniques such as this can help to make SA more accessible to the public, particularly in terms of expressing the relationship between the SA and the policies appraised.
- 2.46. Some practitioners feel that consultation on SA Reports, in addition to consultation on the plans themselves, is causing consultation ‘fatigue’ (e.g. Rumble & Greaves, 2007), reflected in the low number of consultation representations on some SAs (PAS, 2006). Cowell (2004) suggests that extending the opportunities for discussion and consultation of environmental appraisal could be used to address issues of weighting the significance of predicted impacts (this is discussed in more detail below).
- 2.47. It is clear that effective consultation has an important role to play in delivering effective appraisals. While some authorities are exploring new approaches to consultation, for example through options stage workshops on contentious topics (PAS, 2006), there appears to be a need for widespread consideration of means to encourage effective consultation on SA. This was recognised by Communities and Local Government in the consultation document on streamlining LDFs (Communities and Local Government, 2007a). The document proposed that two separate stages of consultation on LDFs (issues and options and preferred options stages) are replaced with a single requirement to engage the public and stakeholders. This would mean that the first point at which the SA Report is legally required to be published is the point when the plan is eventually published (p.8). It goes on to highlight however, that the SEA Directive still requires the consideration of alternative options and early public involvement in the plan’s preparation. This has been taken forward in the newly published PPS12 which states that “*Consultation on the core strategy during the preparation phase of the plan should be proportionate to the scale of issues involved in the plan*” (Communities and Local Government, 2008. p.12). This means that consultation will only occur at the plan preparation stage if a new Core Strategy is

being revised or proposed in response to a major change in circumstances (such as receiving an eco-town or growth-point status). This new approach could be a useful tool for the reduction of so called 'consultation fatigue', provided that local authorities accurately judge when it is necessary to consult at the plan preparation stage. It is important that any screening process applied does not become a burden on local authorities.

## 5. ASSESSING SIGNIFICANCE

- 2.48. The SEA Directive states that “...an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated” (Article 5.1). The difficulty with defining what constitutes a 'significant' effect has been a common theme throughout research (e.g. Therivel, 2002; PAS, 2006). This inconsistency was recognised as one of the factors which contribute to variation in the quality of appraisals. This is directly linked to the issue of subjectivity, discussed under skills and training, above.
- 2.49. The pilot authorities participating in the PAS (2006) study felt that it would be helpful to have further advice on how to assess whether the sustainability effects of policies/strategies are significant, including secondary, cumulative and synergistic effects. The existing SA Guidance advises that authorities need to determine significance on a case by case basis. This is because there are particular circumstances against which significance should be judged, such as the level at which the Local Development Document (LDD) operates in the LDF hierarchy and the geographical area it covers. The SA Guidance suggests other factors should be considered such as the probability, duration, frequency, reversibility, magnitude and spatial extent of effects. The PAS (2006) research concludes that taking all these factors into account, final conclusions are a matter of judgement, with the assumptions on which they are made needing to be set out in the report, emphasising the importance of stakeholder and public engagement, including the environmental, general and specific consultation bodies (p.6).
- 2.50. In his scoping paper on the handling of sustainability objectives within the planning system, Cowell (2004) stresses that in complex planning and environmental problems, “differentiating 'more sustainable' from 'less sustainable' options is unlikely to turn on clear, fact-based rankings”. He suggests that such problem-solving might be addressed through “extending the deliberative opportunities of...environmental appraisal”. The role of the environmental capacity approach, discussed above in terms of evidence, could also be important in terms of defining the significance of effects. Defining the environmental limits/thresholds in the area affected by the plan or programme could help with the justification of the basis for assessing significance, allowing the identification of impacts where the identified thresholds could be breached.
- 2.51. The potential for incorporating alternative methods of valuation and appraisal into the SA process could also be explored. An SDRN Rapid Research and Evidence Review (Stagl, 2006) on emerging methods for sustainability evaluation and appraisal

examined several approaches to valuation and appraisal including deliberative monetary valuation, social multi-criteria valuation, three-stage multicriteria analysis, multicriteria mapping, deliberative mapping, and stakeholder decision/dialogue analysis. The review considers the problems of applying quantifiable valuation processes to sustainable development issues, concluding that valuation and appraisal tools that do not require the monetary valuation of all aspects are more suitable for issues of sustainable development. The review also concluded that valuation and appraisal tools that include public and stakeholder engagement, and draw on both quantitative and qualitative data tend to perform better in decision-making for sustainable development. This suggests that some elements of appraisal should not be subject to universal, quantifiable methods.

### **Monitoring Significant Effects**

- 2.52. The SA Guidance sets out requirements for the monitoring of the significant effects predicted through the appraisal. The Department for Communities and Local Government (2007c) found that for their case study authorities, the linkages between the Annual Monitoring Report (AMR) and SA process were 'patchy at best'. They found that in several cases, SA and AMR processes seem to be treated as two distinct remits that do not yet overlap with each other; "...significant effects indicators do not seem to be influencing monitoring frameworks and, in at least one authority, there were entirely separate arrangements in place for the monitoring of DPDs and environmental impacts identified in the SA" (p. 61).
- 2.53. PAS (2006) highlighted some of the issues associated with integrating SA and AMR approaches as is recommended in the SA Guidance. Their research found that the national core output indicators, with their focus on policy delivery such as levels of house building, did not show much cross-over with significant effects indicators, whose function is to assess the impacts on sustainability.
- 2.54. Fry (2007) identified the implementation of monitoring arrangements as one of the four key challenges facing SA and SEA. Fry suggests that as plans are being adopted, many authorities need to begin to deliver the monitoring that has been promised through their plans and SAs. He suggests that monitoring measures are, in certain instances, ill-defined as they were detailed in a rush towards the end of the plan-making process.
- 2.55. It is clear that assessing the significance of effects highlights issues relating to the subjectivity of SA as a process generally. It is essential to establish a clear baseline from which to assess change and provide guidance for practitioners on how best to deal with the information at different scales (i.e. spatial, geographical, and temporal scales).

## **6. INTEGRATION WITH OTHER ASSESSMENT PROCEDURES**

- 2.56. There are many overlaps between SEA, Sustainability Appraisal and Appropriate Assessment, particularly their emphasis on describing the baseline environment, predicting and evaluating the effects of a proposal on this baseline, mitigating negative effects, and incorporating this information into decision-making (Therivel, 2002).

- 2.57. The SA Guidance sought to avoid the need for a plethora of assessment regimes; “*In general the aim should be to see how much of the actual assessment required is covered already by sustainability appraisal, and judge what else needs to be done to meet the other assessment regimes*” (PAS, 2006).
- 2.58. Schedule I of the Conservation (Natural Habitats, & c.) (Amendment) (England and Wales) Regulations 2006 (Habitats Regulations) inserted a new Part IVA into the Conservation (Habitats, &c.) Regulations 1994 and transposed into English law the requirement to carry out Appropriate Assessment (AA) of land use plans. The purpose of AA of land use plans is to ensure that protection of the integrity of European sites is a part of the planning process at a regional and local level. European sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS) (there are no OMS designated in the UK at present). Draft guidance on undertaking AA was published for consultation in August 2006.
- 2.59. The particular issue with Appropriate Assessment (AA) was highlighted in 2002 by Therivel, and later by the PAS (2006). AA and SA are two separate processes, each with its own legal requirements. SA aims to ensure that LDDs contribute to sustainable development by integrating consideration of social, environmental and economic impacts into plan-making. AA on the other hand aims to ensure that the plan will not have adverse effects on the integrity of sites designated under the Habitats Directive. The Department for Communities and Local Government recommend that AA should be undertaken in association with SA, and that it would be best practice to maximise the relevant experience gathered in SA and use it to inform the AA, and vice versa. The SA and AA outputs should be clearly distinguished and reported upon separately (PAS, 2006).
- 2.60. SA involves the assessment of land-use plans against specific topics (such as health, climate change, etc). This involves the gathering of baseline data and information from expert sources. For health, the guidance recommends this information is gathered from Primary Care Trusts (PCTs). The Department for Health has recognised the significance of this role and has published draft Guidance on Health in SEA (DH, 2007). The document provides guidance on how health can be integrated into spatial planning. This requires health practitioners and planners to work together. As such, the guidance provides an explanation of the planning system for health practitioners and provides planners with an understanding of the role health can play in the delivery of sustainable communities.
- 2.61. Information collected through the SA process can also inform strategy and policy more generally. For example the Department Communities and Local Government (2007c) found that Plymouth had commissioned a greenspace assessment, following on from recommendations in the SAs, and the assessment is being used to inform other aspects of the LDF process (p.52). The potential for the integration of these different forms of assessment was recommended throughout the research (e.g. Therivel, 2002; PAS, 2006; Communities and Local Government, 2007c).
- 2.62. There is obvious potential for the integration of different types of assessment, but this is not being fully exploited at present. There is a need to explore the best way

to integrate approaches where necessary, without sacrificing the quality of any one type of assessment.

- 2.63. Linking SEA and SA with other assessment tools was identified by Fry (2007) as one of four key challenges facing SA and SEA generally. Apart from Habitats Regulations Assessment he identifies plan-level versions of Health Impact Assessment, rural proofing, and urban proofing as forms of assessment which could lead to the duplication of appraisal efforts. There is also potential for confusion as plan makers may receive mixed messages or an overload of information. Fry is positive however that this has been recognised and suggests that some local authorities are already making good progress in integrating and streamlining the tools (p.21).

## **7. EFFECTIVE USE OF SA IN DECISION-MAKING**

- 2.64. Although SA aims to highlight the sustainability pros and cons of options, its active role in decision-making is often diluted by other complex factors. These include conflicting interests between decision-makers and differing levels of knowledge, understanding, and consideration of sustainability amongst decision-makers (Stegl, 2006).
- 2.65. As SA is intended to aid decision-making, it is essential that it be clearly presented to elected members and that they give it proper consideration. Several of the pilot authorities in the PAS (2006) study reported difficulty in getting members involved in the development of the SA framework or in considering the findings of the appraisal. They suggest that this may be attributable in large part to the fact that many sustainability reports are long and daunting and their findings are not presented in a readily accessible way (p.4).
- 2.66. Another concern highlighted was that some elected members see the process of SA as detracting from their role in decision-making. The PAS suggests that this may be down to the way SA and its purpose is explained to members; “it needs to be made clear that appraisal does not seek to override political judgements, but to provide members with evidence to assess decisions” (p.4). This issue was also highlighted in terms of regional planning by Levett-Therivel (2007), who noted that regional planners only have to take account of the environmental report and the consultation findings on that report; ‘The short answer to why SAs are not making RSSs environmentally sustainable is that they don’t have to’ (p.36).
- 2.67. While there are obvious advantages to the engagement of elected members at the early stages of SA, facilitating member’s involvement is difficult in practice. SA reports could be made more accessible to elected members e.g. by reducing the use of overly technical terminology and reducing the overall length of reports. Furthermore, the role of SA in the decision-making process could be more clearly defined, including the extent to which SA findings have to be considered. This would have clear benefits for the value of SA in the policy-making process, and could help to promote more sustainable outcomes. Fry (2007) feels that amongst the benefits SA is having for plan-making, consultation and participation in SA generally (in terms of the public and decision-makers) is helping to open up plan making to a wider audience (p.21).

## KEY ISSUES IDENTIFIED THROUGH LITERATURE REVIEW

- 2.68. There is considerable consensus in the literature that SA is, or has the potential to be, an important mechanism for the integration of sustainability considerations into the preparation and adoption of development plans. This review has highlighted some of the lessons learnt by practitioners when undertaking Sustainability Appraisal. Perhaps inevitably when including views from practitioner journals, the literature explored through this review has tended to focus on those aspects of SA that need improvement rather than those that work well. As a result many of the issues identified appear to be negative and may not reflect the positive experiences of planners and policy makers who are involved in SA.
- 2.69. Key issues identified through the review, and initial potential areas for further research to achieve these improvements are set out below.

### Issues Identified

- The contribution of SA to promoting sustainable outcomes is not being comprehensively measured, monitored or researched, particularly at the local level.
- Practitioners are finding that it is difficult to balance environmental, social and economic impacts against one another.
- There is too much emphasis on getting SA done quickly to meet minimum requirements rather than on ensuring effective policies.
- There is a lack of skills and training in SA, especially for local authority planners.
- The SA process is currently very resource-intensive in terms of staff, time and money.
- The quality of SA can be compromised by a lack of baseline information.
- Often too much information is gathered at the scoping stage without the skills to apply it meaningfully to decision-making.
- There are often too many indicators and objectives used in appraisal, or they are too broad to help with assessment.
- The format and language used in SA Reports can be a barrier to public and stakeholder consultation and their use by practitioners and decision-makers.
- The potential for consultation to aid the consideration of difficult sustainability issues is not being fully realised.
- Elected members and other stakeholders are not always engaged effectively from the beginning of the SA process.
- There is inconsistent assessment of the significance of impacts in SA.

- It is difficult to appraise the extent of potential environmental impacts without detail of environmental thresholds.
- A lack of integration of SA and other assessment procedures can lead to duplication of effort.
- The role of SA in the decision-making process needs clearer definition, including how this is expressed through Regulations.
- There is a lack of independent validation of SA Reports.

## **CONCLUSIONS FROM LITERATURE REVIEW**

- 2.70. This review aimed to determine the extent of existing research on the usability and effectiveness of SA for the delivery of sustainable outcomes. The issues and lessons identified through the review provide an overall understanding of the elements of the SA process which are in need of some improvement.
- 2.71. This focus on areas in need of improvement is primarily to aid the process of identifying areas for further research, but also reflects the common experiences of practitioners and observations of academics. It is perhaps not surprising that the literature has focussed on areas in need of improvement, as SA is a policy appraisal tool which *“like any tool or instrument, needs time for practitioners to learn how to wield it”* (Fry, 2007). SA is clearly well imbedded into the plan-making process, and practitioners have learnt the basic skills for undertaking and using SA in decision-making. Identifying areas in need of improvement is part of the process of capacity building and process refinement. The potential for SA to become a highly valued and influential tool is widely recognised, but practitioners will need to learn quickly from the early pitfalls and focus on how SA will connect with the big issues facing plan makers, such as climate change (Fry, 2007).
- 2.72. This review does not claim to provide an extensive analysis of practitioners’ experience of SA. It aims instead to identify gaps in existing research and determine areas where further research may be necessary to tackle the identified areas in need of improvement. Many of the issues identified are procedural issues which could possibly be better understood through research into a single broad area (such as streamlining the SA process). Some of these broad areas for further research are set out in this review, and were discussed at the workstream workshop. Workshop findings are discussed in the following section.



## 3. WORKSHOP FINDINGS

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### THE WORKSHOP

- 3.1. The seven key themes identified through the literature review were used as the basis for a workshop with spatial planning and sustainability practitioners, policy makers and researchers. The aim of the workshop was to explore the themes identified through the review and issues within these, put forward additional themes or issues for consideration, and prioritise areas for further research.
- 3.2. The workshop was held at the Department for Communities and Local Government's Eland House in January 2008, and was attended by representatives from across the UK, including individuals from environmental and planning consultancies, national and local Government, universities, statutory consultees (e.g. Environment Agency and Natural England), practitioner institutions (e.g. IEMA, IEEM) and other bodies such as the RSPB and Eco Europe.
- 3.3. After an introduction to the workstream and the themes and issues identified in the literature review, a brief discussion was held to open debate and consider any themes which had not been highlighted through the review. The seven key themes were then explored by each of the seven groups. For each theme, the groups were asked to consider:
  - What are the key strengths and weaknesses of SA with respect to this theme?
  - What are the key aspects that need to be addressed through research?
- 3.4. Each group was also asked to identify three key priorities for research into sustainability appraisal overall. These priorities were discussed in the final workshop session.

### KEY FINDINGS

#### Theme I: Delivery of Sustainable Outcomes

##### *Strengths*

- 3.5. The potential for SA to aid the delivery of sustainable development outcomes was highlighted by several groups. Specifically, the role of SA in identifying potential sustainability issues early on in the plan/policy making process to influence decision making was identified as a significant strength of the process. In terms of delivery, the engagement of stakeholders through SA, and the implications this has for driving early decision-making were also recognised as key in the delivery of sustainable outcomes. Several practitioners cited positive experiences where SAs undertaken had influenced the plans being appraised. In terms of providing evidence of how SA has influenced policies in the plan, a suggestion was made by one delegate who was unable to attend the workshop itself, but who made comments on a draft of the literature review. This suggestion was to produce the 'Post-adoption/SEA statement' in draft at the submission of the DPD to the Planning Inspectorate. The LPA would have to explain

to the public and Examiner how they have considered the SA Report and consultees' views in developing the submission DPD. This would then allow the examination to explore the issues of how the plan was helping to achieve sustainable outcomes. The benefit of this approach is that the SEA statement is a pre-existing requirement for all DPDs so this approach merely redistributes existing effort in SA practice, rather than adding to the additional burden that may be resisted by LPAs.

### **Weaknesses**

- 3.6. There were three key weaknesses identified with respect to this theme. The first was the lack of weight given to SA in the plan-making process. As the outcome of SA is not binding, there is no requirement to change policies in line with SA findings. The second point is that SA has limited influence over the delivery of the plan and therefore the delivery of the policies within it. An overarching comment in relation to this also emphasised the fact that the spatial planning system alone cannot deliver sustainable development. The third key weakness identified relates to the skills and resources involved in the SA process and how shortfalls in these can inhibit the delivery of robust SA's, and therefore sustainable policies and outcomes. A lack of benchmarks from which to base decisions, and the extent to which the SA process is dependent on the values of the appraiser was criticised for leading to 'lopsided judgements'.

### **Key aspects that need to be addressed through research**

- 3.7. The following aspects were identified as requiring further research:
- The actual contribution of SA to delivering sustainable outcomes.
  - The definition of 'sustainability' when considering sustainability effects through SA.
  - How to align the objectives of SA with the objectives of the plans and policies being appraised.
  - Evidence from legal cases to determine how SA has influenced plans/policies.
  - How to set long term targets and a targets mechanism for review of strategy and policy.
  - What plan is best placed to deal with particular outcomes, and the level at which these might be addressed.
- 3.8. It was also suggested that the reformed planning system and SA are not mature enough to give evidence of the impact of SA on the delivery of sustainable outcomes through planning.

## **Theme 2: Skills and Training**

### **Strengths**

- 3.9. The variety of skills and specialisms involved in SA was considered to be a strength, particularly in terms of the benefits of joint-working. This may be in relation to joint working between local authorities, or between local authorities and agencies or

consultants for example. Shared knowledge and the stimulation of independent thinking about sustainability issues were also identified as strengths.

### **Weaknesses**

- 3.10. The resource-intensity of undertaking SAs was identified by delegates as leading to a lack of depth in findings, as resources are spread too widely. Delegates felt that the SA process is not developed adequately enough and there is often a lack of focus in reports. SA practitioners were criticised for sometimes being too value-laden when it comes to decision-making. The rapid pace of policy-change was also identified as a barrier to skills development, as it is difficult and time consuming to keep up to date with policy changes.

### **Key aspects that need to be addressed through research**

- 3.11. The following aspects were identified as requiring further research:
- Identifying parts of the SA process that practitioners don't feel confident working with.
  - How best to integrate SA into plan-making skills.
  - The need for, and best ways to deliver, training.
  - How to streamline evidence gathering and plan-making.
  - How to integrate approaches to reduce resource-intensity and encourage value-for-money.
  - How to make better use of the pre-existing skills to assist or lead SA work, as these skills already existing within LPAs (heritage, conservation, transport, economic development), consultation bodies (biodiversity, flooding, heritage) and with wider stakeholders (effects on health, local priorities). This also relates to the gathering of evidence, discussed below.

## **Theme 3: The Evidence Base**

### **Strengths**

- 3.12. The overwhelming message to emerge was that if the right evidence is used and applied in the right way, it can lead to a more robust SA, and in turn provide a sound base for a good development plan. SA was also seen as providing an opportunity to assist in plan-making by identifying gaps in the evidence base used to develop the plan being appraised. The amount of evidence available was cited as a clear advantage. As one of the tests of soundness, the use of evidence in SA was also seen as a tool for passing these and getting a plan adopted in the long run.

### **Weaknesses**

- 3.13. The vast amount of information available to provide the evidence base for SA was considered an advantage, but was also found to result in difficulties in gathering the right information from the right sources and applying it successfully to SA

frameworks. There is a lot of information held in different places and in formats which are not always user-friendly. It was also suggested that evidence for factors such as travel to work patterns or tourism, were not readily available and therefore not always used in SA. It was also suggested that practitioners gather the information which is readily available, and measuring effects/indicators that are easy to measure, rather than that which is the most appropriate or usable.

- 3.14. A lack of consultation was also blamed for the gathering of the wrong information to inform a sound SA and plan, resulting in much of the information that was gathered being unusable or even irrelevant.
- 3.15. In terms of the application of the evidence base, the main issue identified was that evidence is not always applied to the SA framework in the right way. Evidence is sometimes gathered to fit into the SA framework, rather than informing it. The techniques for using evidence to predict the effects of the plan using the SA framework were also suggested to be inadequate. It was suggested that it was also hard to communicate this through the ticks and crosses approach often used in appraisals. The use of indicators for SA objectives was also considered to be lacking in many SAs.

***Key aspects that need to be addressed through research***

- 3.16. The following aspects were identified as requiring further research:
  - Ways to make data more readily available in usable formats.
  - How best to use monitoring to test the suitability of the evidence base and its predictive use.
  - Research into the possible usefulness of mock trials/inquiries to evaluate the evidence base.
  - Other possible evidence bases that could be brought into SA.
  - How to ensure independence and validity.
  - Tools for identifying gaps in SA evidence.
  - How to develop evidence to cover the big issues (e.g. Carbon Emissions).
  - How to use evidence to test scenarios.
  - How best to pool skills in the collation of evidence.
  - How to standardise data sets and tools for use in SA.
  - Identification and dissemination of best practice.
  - More emphasis on trends.
  - Research the provision of information – what is required, what is available.

- How to extend the quantification of effects.

## **Theme 4: Effective Consultation**

### **Strengths**

- 3.17. Consultation with the public was recognised by delegates as an essential part of good plan-making. It was also recognised that benefits only come from consulting at the right time and as effectively as possible. This applies to public consultation, and consultation with decision-makers. The flexibility of consultation requirements for SA was identified as an advantage. However, this flexibility was also criticised for allowing planners to avoid undertaking effective consultation.
- 3.18. The need for a Non-Technical Summary as part of an SA report was cited as an important part of effective consultation.

### **Weaknesses**

- 3.19. Weaknesses cited in relation to this theme cover two overarching issues: engaging people in the process; and then the impact of consultation on the SA and the plan being appraised. In terms of public engagement it was suggested that SA consultation is not empowering to some minority groups, and the language used is often too technical, and ideas too obscure to entice the public to get involved. Reports themselves were considered to be too long, and non-technical summaries in particular were criticised for often being too technical. In terms of the relationship between consultation on the SA and on the plan, it was suggested that people do not necessarily see the link between the two; which sometimes leads to complications with the consultation response. In terms of consultation timings, it was suggested that this was often undertaken at the scoping stage and then at the very end when the plan has been finalised to a large extent. It was recommended that more consultation, which was more detailed and included alternatives, is required.

### **Key aspects that need to be addressed through research**

- 3.20. The following aspects were identified as requiring further research:
- The effectiveness of consultation on SA, including the number of responses received.
  - Examination of the difference between SAs before and after consultation.
  - How best to engage in the consultation process (cost, issues etc).
  - The extent to which the public is interested in engaging on alternatives – is the aim of consultation to get information, or to make a decision?
  - Consideration of the weight given to consultation responses.
  - Pinpoint what information is needed from SA consultation, and how that is different from the consultation needed for the plan.

- How to get stakeholders (e.g. PCT etc) engaged early enough in the process for the Local Authority to effectively influence the plan.
- Explore how Non-Technical Summaries can be better prepared and more engaging.
- How to ensure planners have the skills to effectively engage with the public.
- How to make it easier to read the SA alongside the plan.

## **Theme 5: Assessing Significance**

### ***Strengths***

- 3.21. Current SA guidance was found to be a useful tool to set the framework for considering significance to focus SA. SA was commended for allowing ‘show stoppers’ such as Natura 2000 sites to be identified early on. Annex II of the Directive was found to be a useful guide for ensuring the same criteria were used to determine the significance of effects, including the recognition of direct, secondary and cumulative synergies.

### ***Weaknesses***

- 3.22. Weaknesses identified included issues with determining the significance of effects and then the implications of these difficulties when applying significance to appraisals. Balancing the severity of different effects and determining what the most significant effects are, for example when considering both local and national priorities was identified as an issue. The significance of the effects of non-spatial policies (i.e. criteria based policies, such as general renewable energy or community policies) were also identified as being particularly difficult to assess. A need for environmental capacity studies for different geographies was also identified. This is tied to the need for more information to help the determination of significance.
- 3.23. Delegates identified difficulties with determining the significance of effects on sensitive features which are not necessarily directly affected. The example given related to Special Protection Areas; when a district contains a Special Protection Area, a sensitive feature, and small-scale development is proposed at the other end of the district, some distance from the SPA, it is difficult to determine the significance of the effect of the development.
- 3.24. The tick-box approach often used in SAs was also criticised for not allowing appropriate discussion of the significance of effects. The impact of these issues was found to result in analysis that did not appropriately consider qualitative information as it was not as easy to measure as quantitative data. Overall, tools for assessing significance were considered to be both underplayed and underused.

### ***Key aspects that need to be addressed through research***

- 3.25. The following aspects were identified as requiring further research:

- Developing robust ways of assessing significance effectively (relating to particular circumstances or places).
- How to take into account value bases when assessing significance – is it qualitative or quantitative?
- Explore how the legislative framework helps to determine significance.
- Additional guidance on determining the significance of effects.
- Whether SA should seek to make ‘hard and fast’ judgements or just indicate ‘relative’ sustainability.
- How to assign ownership to effects and remedial action for cumulative effects once these have been identified.
- Identify and promote leading indicators that will predict future problems as well as to measure existing ones.
- Review options for passing the test of soundness.
- Research for early canvassing of alternatives.
- How to ensure evidence-tuned information before option generation.
- Significance needs to be properly defined and consistency of interpretation ensured.

## **Theme 6: Integration with other Assessment Procedures**

### ***Strengths***

- 3.26. Integrating SA with other assessment procedures (such as Habitats Regulations Assessment, and Health Impact Assessment) was considered to have several advantages. One of these was the potential to ‘streamline’ processes, but also to link key effects which would otherwise be assessed separately but contribute to or are affected by the same processes (e.g. health, habitats and equality in relation to climate change).

### ***Weaknesses***

- 3.27. There were more concerns than advantages identified in relation to this theme. Delegates were concerned that there would be a risk of diluting conclusions, (e.g. Appropriate Assessment [AA] conclusions if the processes were integrated, as AA currently holds more weight). There was concern that assessments could be skewed towards a particular interest or outcome if integrated.

### ***Key aspects that need to be addressed through research***

- 3.28. The following aspects were identified as requiring further research:
- Research how integration would affect AA conclusions.

- How to deal with integration of assessment procedures in terms of devolved Government and regulations.
- How to integrate appraisals across different administrative areas.
- Whether integration been attempted, and the extent to which it was successful.
- How to tier assessments.

## **Theme 7: Decision Making**

### ***Strengths***

- 3.29. Delegates suggested that SA was a useful tool for communicating sustainability and planning issues to decision-makers, and in effect institutionalising sustainability. The role of appraisals in providing part of the evidence base for decision-making was highlighted, and found to provide a certain level of transparency and additional structure to the policy formation and decision-making processes. The ability of appraisals to feed into the decision-making process was discussed, and the ability of the process to highlight sustainability issues in a holistic and consistent way was also recognised.

### ***Weaknesses***

- 3.30. The decision-making process was considered by some to lack transparency and a clear audit process. Some suggested that key decisions were often made without SA advice. There were several potential reasons suggested for this. These include issues with the recommendations themselves, which were found to sometimes be inaccessible (i.e. non-technical summaries being too technical), or that sometimes the appraisal team may not provide sufficient access to the SA for it to influence the decisions made about the plan or development. Some SAs were also criticised for providing recommendations that were vague and watered down to make them more palatable for council members. Conflicts of interest among decision-makers were also found to be a disadvantage, with the need for a culture change considered essential. The lack of a national strategy was criticised for affecting the weight given to SA recommendations by decision makers.

### ***Key aspects that need to be addressed through research***

- 3.31. The following aspects were identified as requiring further research:
- Explore how transparency is expressed in SA reports.
  - Explore what structures (e.g. an SA stakeholder group) are in place to assist decision-making.
  - Possibility of SA training through organisations such as the RTPI – a Google search by one delegate was found to indicate there is currently no SA training for members.

- How to make documents accessible to decision-makers – including determining what would be the most helpful format for a document.
- How to tackle SA and plan-making when different agencies are working to different timetables.
- Examination of how the planning inspectors use SA.
- The possibility of using a common evidence base – leaving interpretation to appraisers.
- Examination of the extent to which decision-makers are actually using SA reports, and the extent to which they are changing recommendations and policies within the plan.
- The extent to which the right alternatives are identified and effectively tested through SA.

## **Other themes**

### ***Options Appraisal***

- 3.32. One of the objectives of the workshop was to identify areas or key themes which had not been picked up through the literature review. The consideration and testing of alternatives in SA was highlighted as one such topic. The SEA Directive requires that reasonable alternatives to the preferred development options are tested through SA. Therivel (2004) suggests that without SEA, alternative development options are usually proposed in response to problems rather than as ways of achieving a future vision, being ‘reactive rather than proactive’, and that alternatives considered are usually project-based rather than strategic alternatives (e.g. different routes for a new bypass might be considered rather than alternatives to developing the bypass itself). The role of SEA (now also SA) is identified by Therivel as being to help to identify and assess the impacts of different alternatives to help inform and support the choice of alternatives and hopefully make that choice more sustainable as part of a transparent decision-making process. It was suggested at the workshop that the issue of whether all of the right alternatives are identified and adequately tested through the SA process would benefit from further research.

### ***SA at the National Level***

- 3.33. The Planning White Paper (Communities and Local Government, 2007) included proposals for a series of national policy statements which would be subject to appraisal in the form of SEA/SA. This issue was discussed at the workshop as a significant change which should be explored in more detail. Since the workshop the Planning Bill was introduced (on 27<sup>th</sup> June 2008), which does require that the Secretary of State carries out an appraisal of the sustainability of the policy set out in national policy statements.

### ***Incorporating SEA into SA***

- 3.34. The usefulness and appropriateness of incorporating SEA into SA in view of the aims and objectives of the SEA Directive was also discussed at the workshop. It was suggested that there could be separate, environmental, economic, and ‘social’

appraisals, which could help to identify 'trade-offs'. This is only one possibility but does raise the wider debate about the incorporation of SEA into SA.

### ***The use of an Objective-led approach to SA***

- 3.35. It was also noted that the standard practice use of an objective-led approach to SA and the use of an Assessment Framework are two other areas which are subject to a significant degree of debate when SA practice is discussed.

## **RESEARCH PRIORITIES IDENTIFIED AT WORKSHOP**

- 3.36. In the closing plenary of the workshop, groups were asked to identify from their discussions their top three (or more) priorities for research. These were not confined to the seven themes identified. The following areas were identified:

- **The skills gap.** Particularly:
  - Whether there is actually a lack of skills or just a lack of capacity to undertake SAs effectively.
  - Whether there are skills which are specific to SA.
  - The value structures underpinning practitioner skills.
  - How to achieve a better understanding of the role of SA in the planning process so the SA process is more creative and positive at all stages.
- **Determination of sustainability goals.** Including:
  - A definition of what is meant by sustainability.
  - Determination of the sustainability goal of SA.
  - Matching appropriate objectives to levels at which alternatives are being tested.
  - How to link SA objectives back to National Guidance – to provide an Audit trail for the Inspector.
  - An agreed list of plans, policies and programmes considered useful to inform appraisals.
- **Tools and techniques for forecasting sustainability objectives into the future – focussing on big issues:**
  - Future baseline – testing whether there is any reliance in forecasting future baseline information.
- **Predicting and using future baseline conditions.** Including:
  - How to develop datasets showing trends over time.

- **How to engage with stakeholders who are outside the planning system.**
- **Research and review SEA statements/adoptions statements for evidence of effectiveness of process.** Particularly:
  - How these have influenced decisions.
  - How much account is taken of consultation.
  - Explore how responsibility for remedial actions is dealt with e.g. cumulative effects across authority boundaries.
- **Explore the knowledge and understanding of SA amongst elected members.**
- **Impact of SA on policy and decision-making.** Including:
  - The number of policies and outcomes directly affected by evidence in SA.
  - The extent to which planners are using SA when making decisions.
- **Consultation.** Including:
  - Examination of the extent of consultation responses on SA.
  - Examination of the most effective ways of going about consultation for different groups.
- **Integration of SA with EIA/HIA/EQiA.** Including:
  - The extent to which these processes should be integrated.
  - If these processes should be integrated, what is the best means of integration?
- **Options Appraisal.** Including:
  - Can options appraisal be front-loaded and how would this work?
  - How best to canvas options at an earlier stage in the SA process.
- **Communicating evidence and ensuring understanding.** Including:
  - How best to present the evidence so that the decision-maker is fully informed (including at political or inspector level).
- **Dealing with specific issues and outcomes (e.g. impacts on climate change and green infrastructure).** Including:
  - Identification of the best plan to deal with these outcomes.
  - Identification of examples of addressing linkages between these plans.

- **Delivery of Sustainable Outcomes.** Including:
  - The effectiveness of SA on policy.
- **Review good practice.** Including:
  - What works, what doesn't, and what can we learn from this.
- **Evidence base and environmental limits.** Including:
  - How best to ensure the plan is based on these limits.
  - How to integrate the concept of environmental capacity into SA.
- **Value for money.** Including:
  - How best to assess value for money from SAs.
- **Standardised datasets.** Including:
  - What would be required, how it would be gathered, and how it would be applied to SA.
- **Significance.** Including:
  - Tools and approaches for determining significance.
- **Legal Challenge.** Including:
  - The extent to which the threat of legal challenge affects the content of SAs and the policies they inform.

## 4. CONCLUSIONS AND RECOMMENDATIONS FOR FURTHER RESEARCH

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### SUMMARY AND CONCLUSIONS

- 4.1. The objective of this workstream was to explore the role of SA in the delivery of sustainable development outcomes through the spatial planning process. This was undertaken through a review of literature pertaining to SEA/SA (both practice and process), which established gaps in existing research and recommended areas in need of further research. These were discussed further at a session at the SDRN Annual Conference, as well as at the workshop. This allowed for a final set of recommendations to be developed.
- 4.2. The literature review focussed primarily on areas in need of improvement. This reflected the common experiences of many practitioners and observations of academics. The review highlighted common issues and problems encountered by practitioners, which would benefit from further analysis.
- 4.3. The workshop provided an opportunity to test the issues identified, and stimulate discussion between planners, academics, policy makers and other stakeholders. Feedback from the workshop groups focussed on the aspects of SA where practitioners are experiencing difficulties.
- 4.4. While the difficulties expressed might be longstanding issues of concern with SA, the rapid pace of policy change means that lessons are continually being learnt and new opportunities being created to improve the effectiveness and usability of SA as a spatial planning tool, and to highlight the real effects of policy decisions.
- 4.5. Practitioners' experiences and recommended areas for further research are divided into three key areas:

#### **Making the process more practitioner-friendly**

The difficulties encountered with different elements of undertaking SAs such as evidence gathering, testing alternatives, determining significance etc, would all benefit from examination to determine how best to tackle these aspects of the process.

#### **Evaluating the impact of SA**

The second area involves the determination of the extent to which the SA process in its current use and form is actually affecting policy formulation and decision-making. There is evidence of areas where SA recommendations are making a real difference to development plan policies, but equally there is evidence to suggest that recommendations are often ignored. It was suggested that SA has not been around long enough for its influence on outcomes on the ground to be analysed, but we would argue that its influence in terms of spatial strategy development and policy outcomes could be analysed even if longer term development effects cannot.

## **Determining actions to build on strengths and resolve weaknesses of SA**

The third area is based on a requirement to determine what needs to be done to tackle those areas which are not working; to more clearly define the role of SEA/SA and strengthen the areas where it can actually make a difference. The appraisal of national policy statements as proposed by the Planning White Paper (2007) means that SA will be applied at the national level, which could have implications for the role of SA at different levels of the plan-making process. The role of joint-working between administrative authorities when undertaking appraisals also appears to be an area which has not been explored in depth. While good appraisals will consider the implications of the plan and forces influencing it beyond this boundary, the opportunity for exploring the potential for joint-working between local authorities, or SA's which are set at different scales does not appear to have been fully explored.

## **IMPLICATIONS FOR POLICY AND PRACTICE**

- 4.6. This research into practice workstream has highlighted the need for joint-working between spatial planning practitioners, policy-makers, and members of the research community. While spatial planning undoubtedly makes a significant contribution to the promotion and delivery of sustainable development, it is often assumed that the planning system can be used to tackle all sustainability problems when of course, it can't. However, sharpening some of the tools which are involved in the spatial planning process (such as SA) can help to deliver more sustainable spatial plan outcomes. Some of the recommendations highlighted in this report include areas where much work is already being undertaken, and there are several research programmes already underway which have been discussed in this review. There is however still a significant need for further research to develop approaches policy appraisal which have a more influential role in the spatial planning process. Examination of the priorities identified below will in some cases require changes to everyday practices, and in others will necessitate broader policy changes (e.g. consideration of cross-boundary working).

## **RECOMMENDED PRIORITIES FOR FURTHER RESEARCH**

- 4.7. The detailed areas and ideas for further research which were identified through the literature review and workshop findings are outlined earlier in this report. Based on these suggestions, the following overarching priorities for further research on the subject have been identified:
- **Identification and dissemination of SA best practice to practitioners** (i.e. what is working, what is not, how to apply skills to make SAs more robust)
  - **The identification and use of the evidence base to inform SA and policy formulation** (including the potential for standardised data sets, application of evidence, and the use of the capacity approach, such as environmental limits)
  - **Evaluating the extent to which options and alternatives are identified and usefully tested through SA.**

- **Developing tools and techniques for forecasting sustainability trends and outcomes into the future** (including the prediction and use of future baseline conditions).
- **Developing options for how to engage with stakeholders who are outside the planning system.**
- **Reviewing the usefulness and appropriateness of incorporating SEA into SA in view of the aims and objectives of the SEA Directive.**
- **Evaluating the actual and perceived impact of SA on policy formation.**
- **Evaluating the actual and perceived impact of SA on policy outcomes.**
- **Assessing the pros and cons of the integration of SA with other assessment procedures.**
- **Examination of the ‘weighting’ given to economic, environmental, and social effects in appraisals** (including how this has influenced the spatial strategy and policies being appraised).
- **Consideration of the most appropriate geographical scales for SA to be undertaken.** Including –
  - Undertaking SA across administrative boundaries below the regional level; and
  - The role and implications of appraisal of national policy statements.

## **CURRENT GOVERNMENT RESEARCH**

- 4.8. Since this workstream was undertaken, the Department for Communities and Local Government have commissioned research into the efficient and effective use of SEA and Sustainability Appraisal in Spatial Planning. The research aims to:
- Help improve the efficiency of the application of SA/SEA processes;
  - Assess the effectiveness of SA/SEA in influencing plan outcomes and increasing public involvement;
  - Improve consistency in methodology and approach through the development of common baseline information, good practice case studies, and highlighting synergies and methods of integration with other required forms of assessment;
  - To inform any changes to Communities and Local Government guidance.
- 4.9. This research project is likely to explore many of the issues highlighted through this workstream, and is consistent with several of the recommendations made above.

4.10. The Government is also in the process of reporting to the European Parliament and Council on the application and effectiveness of the SEA Directive, and has just published a new version of PPS12. It is hoped that the workstream findings can inform these processes and indicate areas where investment in further research would be beneficial.

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