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National Centre for Risk Analysis &amp; Options Appraisal

**Critical Review of the Proposals for a Good Practice  
Guide on Sustainability Appraisal of Regional  
Planning Guidance (DETR, August 1999)**

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## ***Critical Review of the Guidance on Sustainability Appraisal of Regional Planning Guidance***

### **1.0 Introduction**

Guidance on Sustainability Appraisal of Regional Planning Guidance (RPG) has recently been produced by Baker Associates and others and published by the Department of the Environment, Transport and the Regions (DETR)<sup>1</sup>. This report provides a critical analysis of the proposed method, from methodological and implementation perspectives. The National Centre for Risk Analysis and Options Appraisal has been assisted in producing this review by the Environmental Policy and Management Group, Imperial College, London.

The report provides a short introduction to the method before detailing the issues involved. The aim of the report is to support the Environment Agency in its consideration of Sustainability Appraisal for the purposes of its own planning and policy making and to provide technical advice to Local Government Liaison at Head Office who are coordinating the Agency's response to the DETR on the Baker Associates report.

### **2.0 Sustainability Appraisal of Regional Planning Guidance**

Sustainability Appraisal is a process that closely resembles Environmental Appraisal of Development Plans, a best practice method published by the Department of the Environment in 1993. The most obvious changes are a broadening of the issues considered and a shift from a components-led to an objectives-led approach.

The process is divided into steps to case description, but implementation of some elements may be iterative. Figure 1 illustrates the key stages. First, objectives and targets are developed. This is the responsibility of the appraisal team, but they should take their lead from national policies and the sustainable development frameworks that will be set up for each region. A testing of the scope of the plan is followed by appraisals of options and policies. These detailed appraisals require that options and policies be sufficiently elaborated. The final stages are the recording and reporting of findings followed by monitoring and evaluation.

For further details of the method, please refer to the report produced for DETR by Baker Associates.

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<sup>1</sup> Department of the Environment, Transport and the Regions (1999) *Proposal for a Good Practice Guide on the Sustainability Appraisal of Regional Planning Guidance*, DETR, London

**Figure 1: Sustainability Appraisal of Regional Planning Guidance**

**1. Development of Objectives and Targets**

An independent appraisal team determines sustainable development objectives and targets based on national policy and regional sustainable development frameworks

**2. Scoping**

Checking that the strategy has incorporated national policy on sustainable development

**3. Appraisal of Strategic Options**

Strategic options are appraised against objectives developed in stage 1

**4. Appraisal of Policies**

Policies are appraised against targets, or perhaps a single target chosen to represent each objective

**5. Recording and Reporting of Findings**

All findings are systematically recorded to provide an audit trail. Results are reported

**6. Monitoring and Evaluating**

Indicators are used to monitor the effects of the RPG and an evaluation provides information for the next planning round

### 3.0 Analysis

The appraisal method provides a systematic, comprehensive and robust approach to the appraisal of Regional Planning Guidance. There is no reason why it should not be applied to other plan and programme-making processes. Indeed, with the increasing integration of plan-making, it would be sensible to use similar methods of appraisal that produce comparable results.

Overall, the approach is considered to be well suited to its purpose, however, there are a number of issues that should be raised regarding both the method and its implementation.

### 4.0 Methodological Issues

#### 4.1 Relationship with Plan-making

Appraisal, as a testing process, should be seen as distinct from the plan-making process. Nevertheless, it can be a useful design tool and at the strategic level, assessments are often interwoven with plan or policy-making. While the importance of an appraisal team being independent is undisputed, especially given the lack of a review or verification of the results, this has led to some confusion about respective roles.

For example, *scoping* - ensuring that the guidance fulfils the requirements of national sustainable development policy - is an activity that the regional planners should be engaged in, yet is also undertaken by the appraisal team. Similarly, the baseline data collection is considered to be a requirement of the planning process, yet detailed spatially-described information about the region would also be of great value to appraisers.

Finally, the results of the appraisal should be sufficiently understood and accepted by the regional planners to encourage changes in the plan where necessary. The lack of ownership of results, and the use of separately defined objectives and targets may lead to an unwillingness to take on board all findings, despite the suggestion that there should be regular meetings between the two groups.

#### 4.2 Accountability and Public Involvement

The independence of the appraisal team is considered by the report to be sufficient to create the necessary degree of accountability. While an important contribution, clearly, it is also a requirement for the results of the appraisal to be transparent and available to a wider audience, including the public. While there is the suggestion that a formal statement should be published at intervals, there are no recommendations regarding the role of the public in inspecting and questioning appraisal results.

Theorists and, increasingly, practitioners consider public involvement to be a fundamental part of appraisal. While sometimes awkward when dealing with strategic levels of decision-making, a clear role in the setting of objectives in addition to the review of results would be expected. While the objectives are likely to be derived from other regional institutional structures, such as the Sustainable Development Roundtables, there needs to be confirmation that these were originally developed through an open, inclusive process.

### **4.3 Cumulative Effects/Policy Compatibility**

The guidance suggests that the cumulative impacts on individual objectives should be identified and investigated. There is an explanation, albeit brief, as to how this might be achieved. In some respects this supersedes the testing of compatibility of policy objectives, an additional stage in the Environmental Appraisal method for development plans.

However, there needs to be further research done on how the combined effects of policies on geographical areas (spatially-defined cumulative effects) may be assessed. This is mentioned as important, but there is no advice on methods.

### **4.4 Assessment Method Options**

The extensive matrices include detailed commentaries and these provide a full understanding of the thoughts of appraisers. However, they are not summarised easily and do not necessarily give a clear indication of the significance of effects. A simple scoring system, where the criteria for judging the significance of effects are derived openly at the same time as the target setting, may be used to simplify the summary of findings. Such a technique can also support the investigation of cumulative effects where summing impacts for each objective (while keeping positives and negatives separate) highlights which objectives are gaining and which are losing. It also enables a straightforward sensitivity analysis to be undertaken (mentioned, but not elaborated, in the guidance). This would be more akin to a BPEO approach for which there is already some experience.

The Sustainability Appraisal method gives little indication as to how the findings should finally be integrated. While it is the role of decision-makers to evaluate the trade-offs, ensuring that everyone is aware of what those trade-offs are, or could be, is something that the appraisal should attempt to do.

## **5.0 Implementation Issues**

### **5.1 Source of Objectives**

Producing sustainable development objectives for a region requires the participation of a wide range of stakeholders. Therefore, the process can be very lengthy. In addition, the work has to be led by a body with the commitment and remit to do it. Where available, it is sensible for an appraisal team to make use of sustainable development objectives and targets that have been determined in this way. However, most regions have not yet reached this stage, so the appraisal team will perhaps need to draw upon more general guidance. This may make it easier for some to challenge the results of the appraisal - if they are able to question the foundation for the assessment criteria.

In addition, there may be further conflicts between plan objectives and appraisal objectives. It is suggested that the sustainable development objectives and targets that form the basis of the appraisal should be 'aspirational yet rooted in reality'. If the strategy objectives are based upon sustainable development principles they should be qualitatively the same, although they may have different timeframes or targets attached, perhaps more short term. This being the case, the strategy-makers could legitimately dismiss many of the findings of the appraisal on the basis that the RPG objectives and targets are more immediate and relevant, and the longer-term appraisal objectives would be dealt with at a later date.



Third, the characterisation and environmental capital approach developed by the statutory environmental agencies in recent years has been recognised as providing a valuable baseline for appraisal purposes. The details of how it might be integrated into the proposed method have not been evolved and this is likely to be a further area of study. Indeed, research being undertaken by Imperial College is concerned with this in part (CASE studentship with English Nature).

### **5.5 Targets**

Using targets as the basis for appraisals is fraught with difficulties that the Baker Associates guidance does not adequately address. It is not clear what sort of targets they are proposing should be used (the accompanying ECOTEC report published by DETR may go some way to address this). The statement that the targets should be 'aspirational' and 'rooted in reality' has fundamental contradictions that they do not resolve. There is a lack of objective measurable targets for many areas. The significant variations in the bases for the available targets could lead to considerable inconsistency in the findings of appraisals across different areas. Some targets are political targets based on a consideration of all aspects; while others are aspirational targets that set out levels above which environmental damage occurs (e.g. critical loads); while many others lie somewhere in between. The extent to which these different types of targets are not being met has significantly different meanings and implications.

We suggest that the appraisals should be based on aspirational targets and that the meaning and scientific basis for them should be clearly spelt out. These targets should be used to show the extent to which the region is moving towards (or away from) reducing environmental damage.

### **5.6 Anything Missing?**

The beauty of an objectives-led approach to appraisal is that all aspects of sustainable development are incorporated. However, there are two issues that should be further considered by appraisal teams: futurity and distribution of effects.

While an attempt to bring the longer-term view into appraisals through the use of aspirational targets is to be welcomed (notwithstanding the comments above), an additional test of the robustness of the plan under different future conditions may be helpful. Research into the use of the appraisal method alongside tools such as scenario analysis would be especially valuable.

In addition, social equity criteria will inevitably be built into any comprehensive framework for appraisal. Nevertheless, it will only be when commentaries describe the groups of people most affected by policies and when spatial variations are included in appraisals, that the distribution of effects will be adequately dealt with.

## **6.0 Applying the Method Beyond RPG**

The sustainability appraisal method should be a valuable contribution to strategy making in a wide range of organisations. If an organisation wishes to apply it at regional level, the sustainability objectives should already be in place (if the method has already been applied to Regional Planning Guidance). It is likely that the setting of appropriate targets will need to be done on every occasion to ensure they are relevant to the interests of the plan or programme being appraised. Also, the planning process must be capable of accepting such an intervention - in terms of timescales, decision-making process and specificity of plan content.

## 7.0 Conclusions

The method being promoted by DETR for the sustainability appraisal of Regional Planning Guidance is generally sound and should be commanded to Regional Planning Bodies and Government Offices.

While this critique is not intended to be exhaustive, it raises a number of issues that could benefit from further investigation and elaboration. Some additional elements, such as GIS-based cumulative assessments, may be rejected in the short term on resource grounds but should nevertheless be promoted as 'best practice'. Other elements, such as the role of the public, are more fundamental and strengthening of the guidance may be advisable.

In summary, the main issues are as follows:

- difficulty of separating appraisal activities from the process of plan-making;
- problems of using an independent appraisal team (advocated for reasons of accountability);
- need to elaborate the role of the public;
- further advice needed on the assessment of cumulative effects;
- potential for further evolving appraisal methodology;
- importance of achieving consensus on sustainable development objectives;
- possibility of conflicts arising with plan-makers through setting of independent targets;
- need to create a sound information base;
- consideration of futurity and distribution of effects.