

# Department of the Environment, Transport and the Regions

## *Proposals for a Good Practice Guide on Sustainability Appraisal of Regional Planning Guidance*

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### **Acknowledgements**

The project team has been greatly assisted by all members of the Steering Group who have jointly and severally contributed to the thinking behind this document.

The group was made up of:

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Each of the Regional Planning Bodies has also been consulted, and their experience to date has helped to shape this methodology which follows.

Many other individuals and organisations have contributed. These include CAG Consultants, CBI (South West), Countryside Agency, CPRE, English Nature, Friends of the Earth, Greater Manchester PTE, Imperial College (Environmental Policy and Management Group), Land Use Consultants, New Economics Foundation, and RSPB.

The help of all the contributors is gratefully acknowledged and much appreciated.

## Preface

The Department of the Environment, Transport and Regions (DETR) is grateful to Baker Associates for producing this report which sets out their recommendations for a good practice guide on sustainability appraisal of Regional Planning Guidance. The Department will be conducting a series of regional seminars later this year to explore the feasibility of applying this guide in each region. In the light of feedback from those seminars the guidance will be refined, as appropriate, and then published as the Department's good practice. Until then, the Department commends the Baker Associates report although it does not necessarily agree with all the proposals.

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### **CHAPTER 1 Introduction**

#### **Sustainability appraisals**

1.1 Regional Planning Bodies (RPBs) are encouraged to carry out a sustainability appraisal during the preparation of Regional Planning Guidance (RPG) (PPG11, Public Consultation Draft 1999). This reflects the Government's objective of ensuring that the goal of sustainable development shapes decisions at every level of plans and policies, programmes and projects. A sustainability appraisal is a means of ensuring that thinking about sustainable development is ingrained in the strategy making process, and thereby influences subsequent decisions.

1.2 Sustainability appraisals are not confined to the field of planning. Whilst the methodologies adopted and the outputs required vary with individual circumstances, all have the common aim of placing a concern for greater sustainability at the heart of government policy and actions.

1.3 The requirement for an appraisal of RPG to be a sustainability appraisal may be new, but already development plan practice is moving in that direction. At local and regional levels, various bodies have been working to extend the scope of environmental appraisals to embrace the comprehensive aim of sustainable development.

#### **The new regional agenda**

1.4 For many public authorities, statutory bodies, NGOs and service providers, the regional tier is increasingly important. Working at the regional level provides for the effective disaggregation of national policy, for integration of those matters which cannot be determined within local authority boundaries, and for co-ordination of service provision. Adding weight at the regional level also increases the potential for closer working with European partners and will assist with launching European funding bids. In the case of RPG, the regional strategy

provides the strategic framework for lower tier development plans and local transport plans.

1.5 The means of addressing many activities at the regional level are currently being developed. Regional transport strategies, for example, are a new and integral part of RPG. Undertaking a sustainability appraisal and thereby making use of common objectives will assist in this integration.

1.6 In response to this new regional agenda, draft PPG11 (public consultation draft, February 1999) indicates a shift in thinking about RPG. RPG is to set out strategic policies at the regional or sub-regional level where there are matters which need to be considered on a scale wider than the area of a single county or unitary planning authority. The long term aim is that RPG should provide guidance on a comprehensive spatial strategy which is specific to the region and which provides the framework for the range of public policies that will manage the future distribution and level of activities in the region.

## Scope of this document

1.7 This document sets out guidelines for RPBs to use as they develop their sustainability appraisals. In so doing, it draws on the practical experience of a wide range of practitioners who are working to make sense of a difficult, yet potentially very rewarding, task. No such guidance can be definitive. What it aims to do is to develop the broad scope of a methodology which is logical and consistent, acknowledging that it will expand and improve as relevant practice develops over time.

1.8 The guidance is structured in the following way:

- [chapter 2](#) sets the technical context by dealing with definitions and the overall approach to the methodology for appraisal;
- [chapter 3](#) discusses the criteria which are to be used in the appraisal process;
- [chapters 4-7](#) look at the different stages and components of the appraisal;
- [chapter 8](#) examines the importance of monitoring and evaluation of RPG and links the criteria to be used for monitoring with the criteria used for undertaking the appraisal;
- [chapter 9](#) looks at how RPBs can go about the task of meeting the requirement to undertake an appraisal; and finally
- [annex 1](#) provides advice on baseline studies

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### CHAPTER 2

### Approach to sustainability appraisal

#### Performance specification

2.1 A sustainability appraisal can be defined as 'a systematic and iterative process undertaken during the preparation of a plan or strategy which identifies and reports on the extent to which the implementation of the plan or strategy would achieve the environmental, economic and social objectives by which sustainable development can be defined in order that the performance of the strategy and policies is improved.'

2.2 A sustainability appraisal is first and foremost a process. It is intended to test the performance of a plan and thereby to provide the basis for its improvement. The appraisal exposes the conflicts within, and likely impacts of, a plan or strategy in order to inform the plan or strategy making process. The final output from the process sets out the nature of the choices that have to be (or have been) made. The appraisal itself can never make the choices for which the accountable body for the plan remains responsible.

2.3 In terms of what is to be appraised, a sustainability appraisal of RPG can be expected to cover the following:

- appraisal of the scope of strategy content to identify how it accords with the agenda of sustainable development;
- appraisal of alternative strategic spatial options for the development and change which is to take place in the region, including an appraisal of the chosen spatial strategy; and
- appraisal of strategy policies and any associated proposals.

2.4 An appraisal has to work alongside the strategy making process. The two should be independent but interlinked. If they do not interact at appropriate stages in the development of the strategy (see para 2.10ff below), the appraisal cannot help to improve the overall performance of that strategy. A commentary on the performance of a strategy which is undertaken only after the development of the

strategy is complete is not a sustainability appraisal in that it does not contribute to strategy development and policy making.

2.5 The links between the strategy and the appraisal do not end once the strategy is complete. The effectiveness of the strategy can be monitored over time and its actual performance assessed. The criteria which have been used to assess the strategy in its formative stages should be linked through to its monitoring.

### **An objectives-led approach to appraisal**

2.6 Statements about sustainable development are often very general. Generalised statements are of little value in an appraisal, however, because everything depends on their interpretation. The methodology for appraisal, therefore, promotes precision through use of objectives and targets to define sustainable development and provide reference points or a standard against which the regional strategy can be examined. As such, it is described as an objectives-led approach to appraisal.

2.7 An objectives-led approach makes use of clearly articulated objectives which are achievement-oriented and, ideally, quantified. These are used as the basis for testing the strategy. In simple terms, the appraisal takes as its starting point what is to be achieved in the name of sustainable development and then assesses the likely performance of the strategy against that.

2.8 Three stages in objective setting can be identified:

- first, the objectives for sustainable development have to be expressed in a way that is sufficiently specific to enable evaluation;
- secondly, the objectives have to be translated into a tier of quantified targets or, where this is not possible, into intended directions of change; these targets become the benchmark against which strategy content is judged; and
- thirdly, indicators have to be identified for measuring progress through monitoring.

2.9 A set of working definitions of the terms objectives, targets and indicators is set out in the box below.

#### **DEFINITIONS**

**objective:** a statement of what is intended for a policy or series of related policies and of the way that the intention is to be pursued

**target:** an objective that seeks a specified desired end state usually, though not necessarily, within a specified timescale

**indicator:** a piece of information which is used to measure and track the status and progress of a complex system.

Adapted from definitions contained in work done for DETR on '*Developing strategic indicators for evaluating the effectiveness of land-use planning*', Department of Land Economy, University of Cambridge, 1996 (unpublished)

## Linking appraisal and strategy making

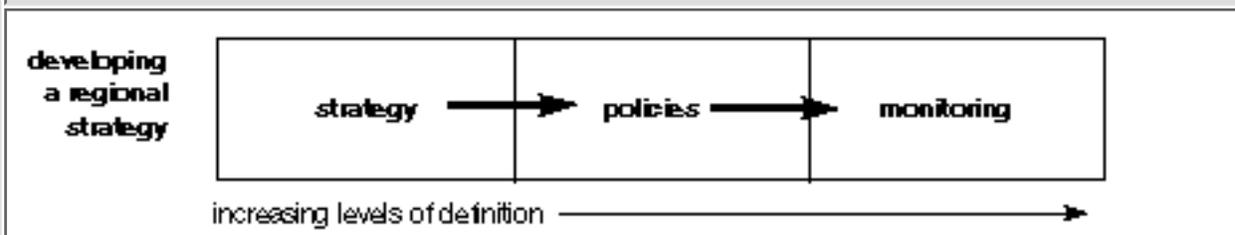
2.10 Each stage in the appraisal utilises increasingly refined definitions of sustainable development as the criteria against which the strategy is appraised, building on earlier choices and decisions. Thus the chosen objectives feed through to the targets and they in turn inform the indicators chosen for monitoring (see figure 1).

**Figure 1: Relationship between objectives, targets and indicators**



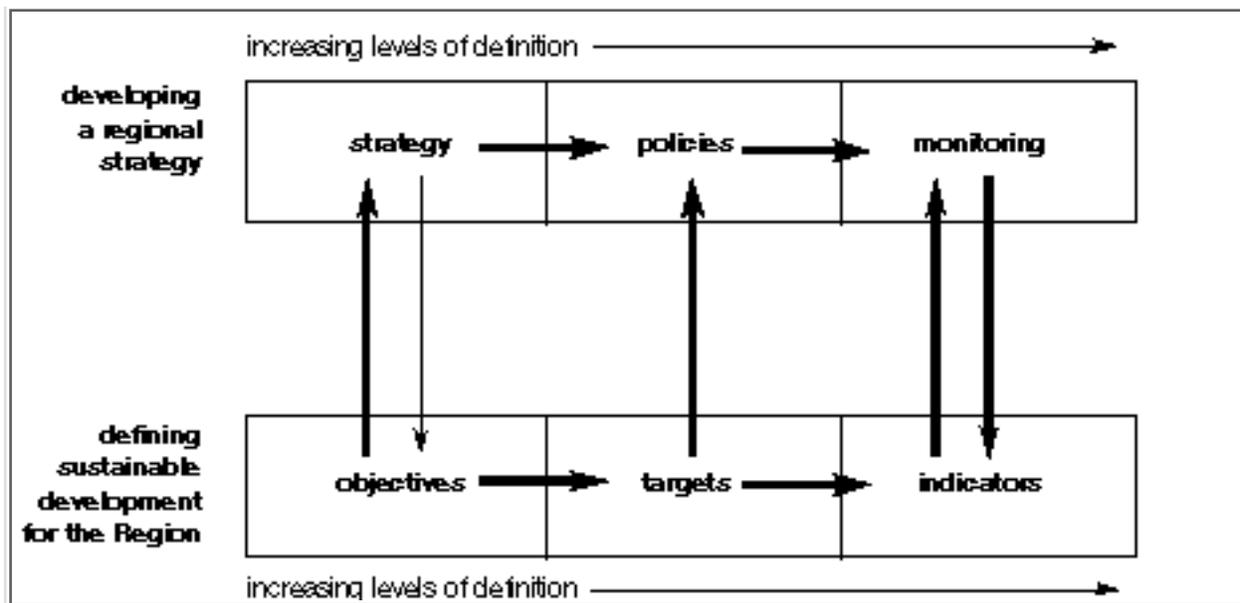
2.11 In its turn, the preparation of RPG involves a number of tasks. It develops a spatial strategy for the region. It moves on to the development of the relevant policies to implement the strategy. Once adopted, it is then monitored as the basis for evaluation and review. The sequential nature of this is set out in figure 2.

**Figure 2: Relationship between strategy, policies and monitoring**



2.12 The process of appraisal explores options for the spatial strategy and helps to inform the choice between them, using sustainability objectives as the criteria for appraisal. It then appraises the policies, seeking to refine them through successive iterations, using the targets as the basis for appraisal. Finally it takes the detailed indicators and uses them as the basis for monitoring. Throughout, the increasing detail of the appraisal criteria is matched by the increasing detail of the RPG development. This model is expressed diagrammatically in Figure 3.

**Figure 3: The model relationship between RPG preparation and appraisal criteria**



2.13 In practical terms, the implication of this relationship is a similarly sequential approach to sustainability appraisal and to preparation of RPG. The detailed relationship between the two processes is set out on figure 4.

2.14 From figure 4, three key features can be picked up:

- the process is continuous, flowing from the earliest stages of appraisal and RPG preparation, through to review and evaluation, with the results feeding back into the start of the next round of guidance preparation;
- appraisal happens throughout RPG preparation and it is iterative ie the analysis contributes to the processes of option development and selection, and to policy development, and impacts on the decisions made; and
- appraisal needs to start early and must not wait until the draft RPG is largely complete.

2.15 The intention of appraisal is to ensure that the goal of sustainable development underpins the RPG. It would significantly undermine that intention if modifications were made which did not take a region's aspirations for sustainable development into account in the same way that they are taken into account through the appraisal process in the rest of the RPG preparation. Figure 4 therefore shows the appraisal process extending to the modifications stage. The required extent of the appraisal will depend on the significance of the modifications and it is unlikely (though possible) that options would need to be revisited.

2.16 The appraisal at this stage should be done in the same way as the earlier parts of the process and should be one of the inputs to the Secretary of State's decisions.

## Indicators and monitoring

2.17 The relationship between objectives, targets and indicators assumes that the choice of indicators by which the sustainability performance of a strategy is to be

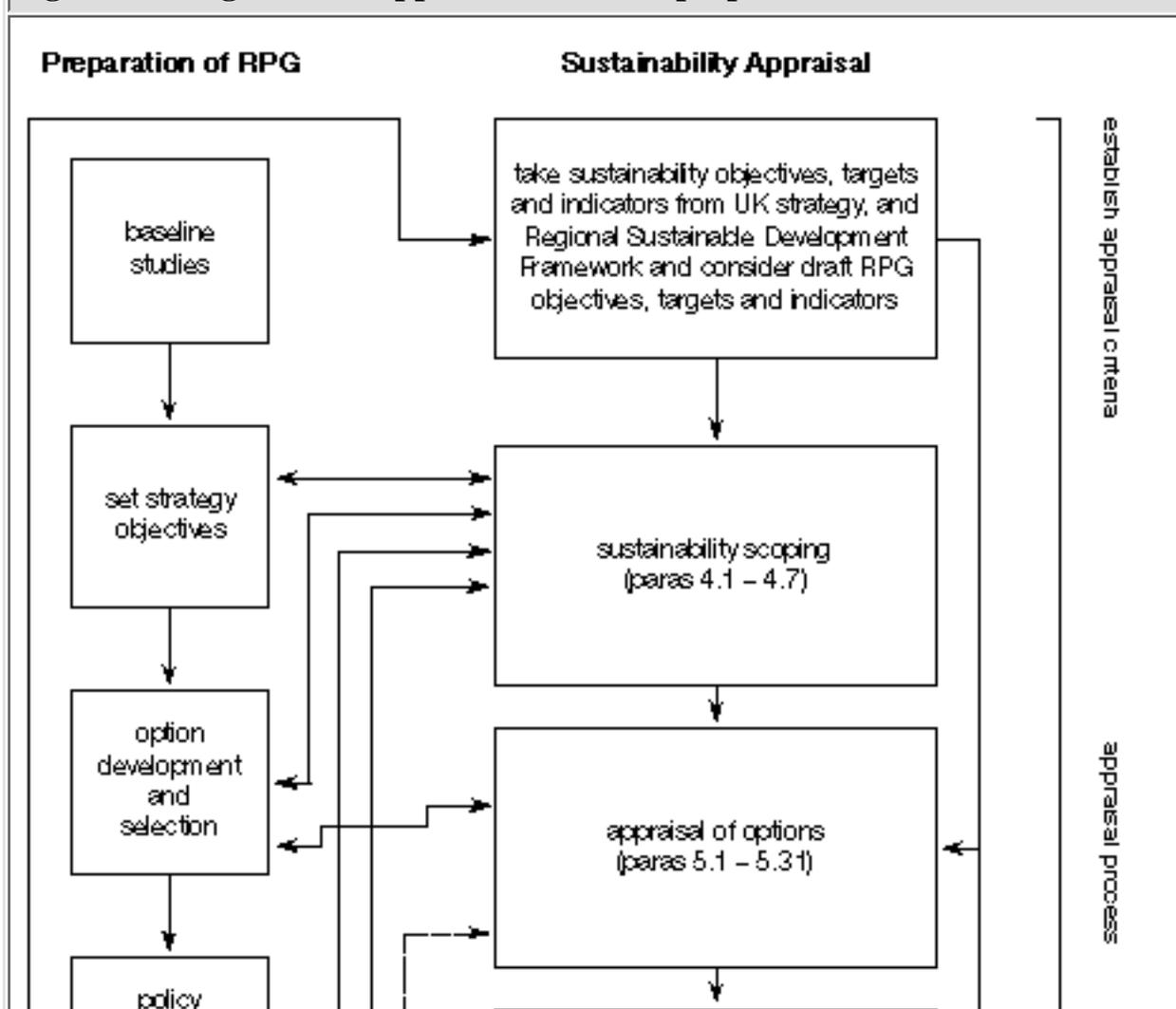
monitored is linked to the objectives and targets ie they are specifically related to intent rather than to description.

2.18 There are always limitations on how many indicators should be used for practical and financial reasons and indeed because of potential information overload. Their number should be kept to as few as reasonably possible and once selected, the relevant data should be collected. It is essential that progress with implementing the RPG is monitored and its effectiveness reviewed in terms of the objectives for sustainable development.

### Implications of appraisal for RPG

2.19 A pre-requisite of appraisal is clear RPG which is sufficiently specific in its policy intention to enable it to be appraised. RPG must be much more specific than hitherto in order to meet the requirements of draft PPG11. If RPG meets the expectations set out in this draft PPG, it should be capable of being appraised in a meaningful way. Furthermore, the fact of being appraised from the outset should ensure that unclear and insufficiently specific policies are rejected before the draft RPG is prepared.

**Figure 4: Integration of appraisal and RPG preparation**





continue to rely on generalised comments in its early years.

## Independent appraisal

2.23 If appraisal is a process of testing, then it follows that there needs to be a strong element of objectivity. Objectivity is promoted in the methodology through the use of independent sustainability objectives as the criteria for the appraisal.

2.24 We believe it is unlikely that the team formulating the RPG can provide the necessary objectivity in the use of the appraisal criteria. It is therefore recommended that the appraisal is carried out by an independent team. The composition of this team will vary.

It may include, for example, a dedicated team of people from the RPB who are not otherwise involved in strategy and policy development with involvement, as appropriate

of other regional stakeholders, an academic institution, or a firm of consultants. It may make sense for one or two members of the strategy making team to be part of the appraisal team to ensure both that the strategy is properly understood by the appraisers and that the findings of the appraisal are properly fed back to the strategy makers.

2.25 It follows that, whilst promoting independence, this guide is not advocating total separation of appraisal and the strategy making process. The chosen method of working has to ensure on-going dialogue between the people doing the appraisal and the people preparing the strategy. The target must be for transparency and openness between the two parties in order to facilitate the use of the appraisal findings to improve strategy performance.

2.26 The issue of accountability is dealt with by the appraisal team taking technical responsibility for the appraisal and by the RPB agreeing to take account of, and ideally accept, the findings. However, the decisions which in part or in whole are taken as a result of the appraisal will continue to fall to the RPB to make in liaison with other regional stakeholders in preparing draft RPG.

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### **CHAPTER 3 Setting appraisal criteria**

#### **Who defines the sustainability objectives and targets?**

3.1 In keeping with the principles of sustainable development, it is appropriate that each region undertakes the task of developing and endorsing its own objectives for sustainable development in a consensual and inclusive way. Currently each region is considering its position with respect to sustainable development. This will be given significant impetus

by the Government's support, in the recently launched new UK strategy for sustainable development 'A Better Quality of Life', for each region to prepare a Regional Sustainable Development Framework. These frameworks should provide an agreed regional context of objectives and targets to inform the preparation of regional strategies and programmes, including RPG.

3.2 All regional stakeholders should have the opportunity to be involved in the development of the regional objectives for sustainable development, and all should work to them in the future. In the most developed model, it can be anticipated that a Regional Sustainable Development Framework will provide the sustainable development objectives which form the basis for many regional activities undertaken by a wide range of regional stakeholders. If appropriate, other objectives would be set by the RPB in consultation with other stakeholders.

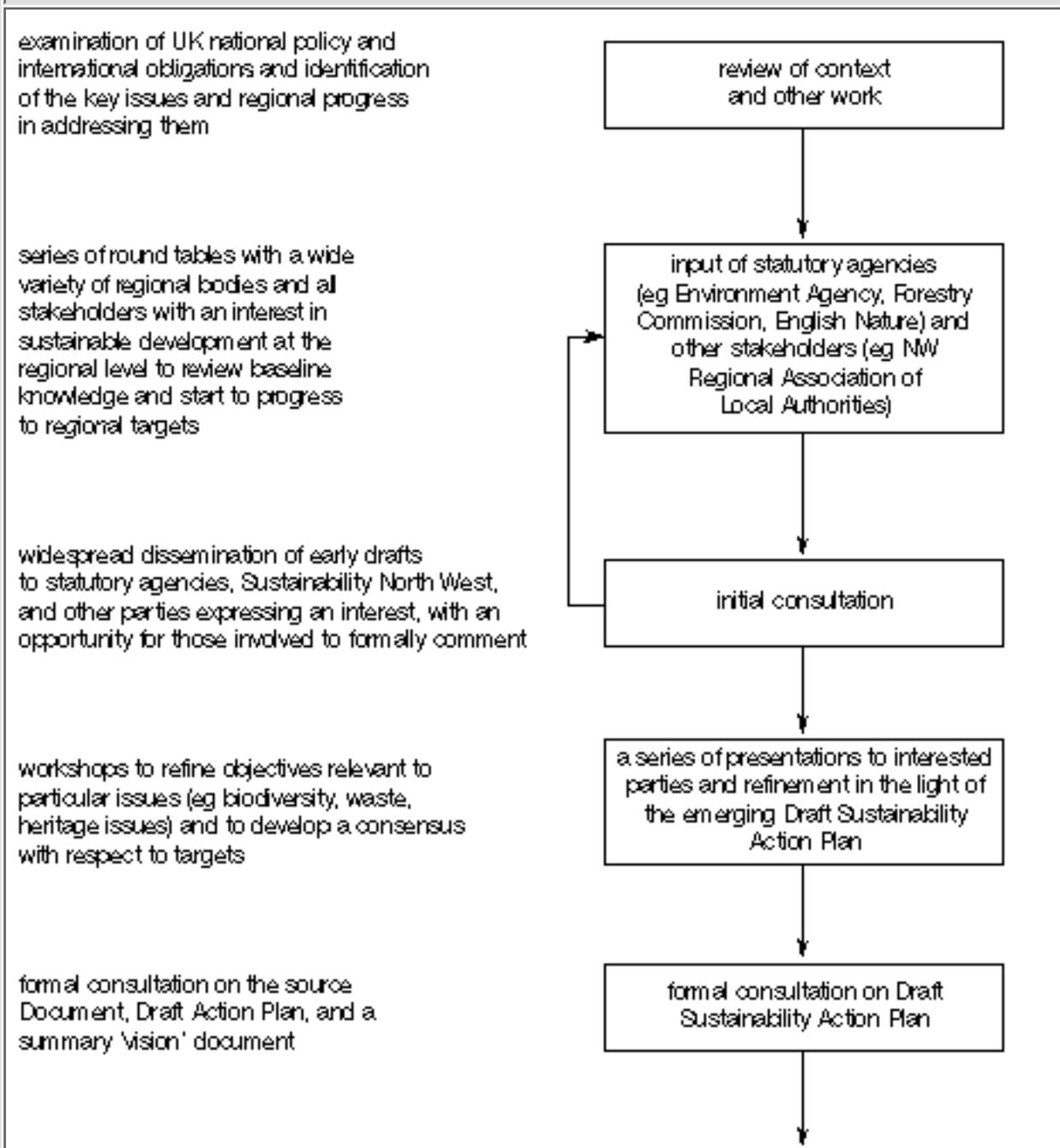
3.3 The mechanism for developing the objectives will necessarily vary to suit the circumstances of each region. The North West region provides an example of how objectives were set in a sustainable development action plan. The principal steps in preparing this action plan are set out in figure 5. These are being further refined in the relevant regional strategies and programmes, including RPG.

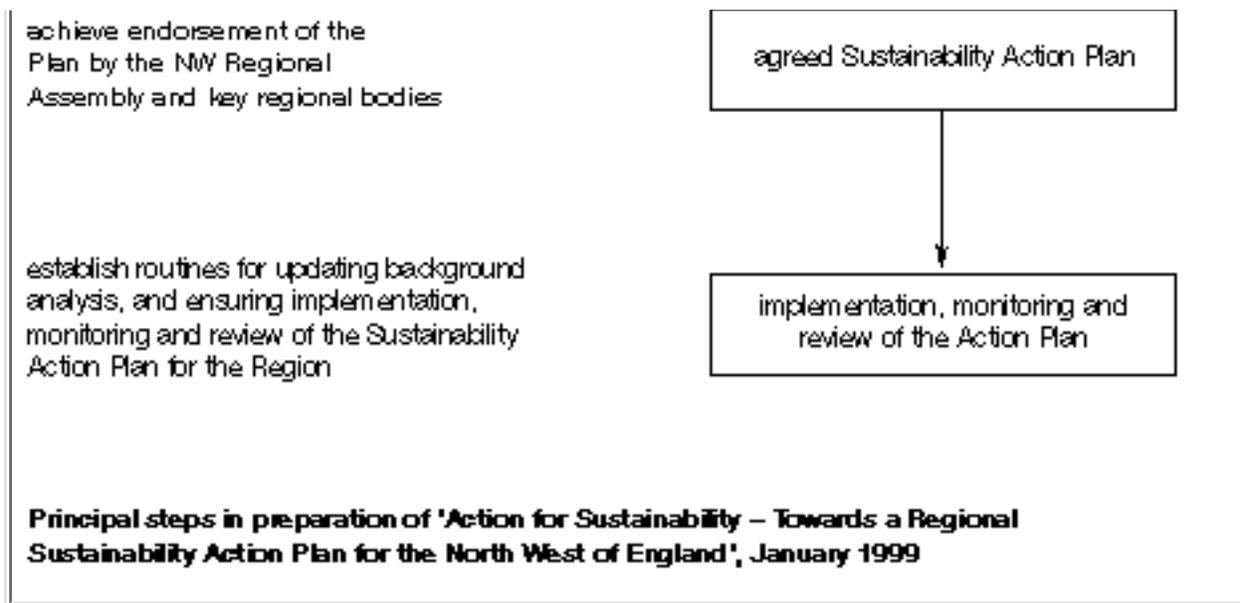
3.4 The RPB, in consultation with other regional stakeholders, will need to give careful consideration to whether some of the targets and objectives that have been set in any Regional Sustainable Development Framework need to be refined because they are too ambitious for inclusion in draft RPG. If the regional target

cannot be achieved, such as a situation where insufficient resources are available for the requisite investment, then the RPB will work with what seems practical. It is important that the difference between the draft RPG and the Regional Sustainable Development Framework targets are justified.

3.5 Meanwhile, in the majority of regions, a set of regional objectives for sustainable development is not currently available. In this situation, the RPB team will have to develop an appropriate set drawing on the new UK strategy and discussions with other relevant regional stakeholders. The team undertaking the sustainability appraisal will need to consider whether these objectives are properly justified and consistent with the UK strategy. Guidance to assist the RPB and the appraisal team with these tasks is set out below.

**Figure 5: Regional Sustainability Objectives and Regional Strategies: the example of the North West**





## An illustrative set of objectives and targets

3.6 The four underlying themes set out in the new UK Strategy for Sustainable Development provide a well structured starting point for the development of sustainability objectives. These are:

- maintenance of high and stable levels of economic growth and employment;
- social progress which recognises the needs of everyone;
- effective protection of the environment; and
- prudent use of natural resources.

3.7 In order to assist with the task of developing a methodology for appraisal of RPG, an illustrative set of objectives and targets is included in this guidance (see figure 6). DETR has recently published a "Scoping Study: RPG Targets and Indicators", carried out by a firm of consultants (ECOTEC), which shows that in many cases the relationship between policies, targets (where they exist), and indicators is unclear. The Department has commissioned a follow up project to produce good practice which would foster a consistent approach between regions in the development of targets and indicators and enable the effectiveness of RPG to be better judged.

3.8 No set of objectives for sustainable development can be definitive. Those in figure 6 we believe are all relevant to varying degrees to RPG and provide a basis which can be adapted to suit the character and requirements of each region. However, neither the RPB nor the appraisal team should assume that these are necessarily supported by the Department. They are merely a guide which we are suggesting could be useful. Although RPG is capable of only having an indirect influence on many of the objectives, targets and indicators listed, it will be an important part of the appraisal process to ensure that the emerging strategy is not inconsistent with the objectives and targets for sustainable development which should inform the RPG preparation process.

3.9 The list is by no means comprehensive, and the omissions may be ones which some regions wish to rectify. Health, for example, has been excluded on the grounds that RPG has only indirect influence through matters which are dealt with by other objectives and targets (eg employment and air quality). A full regional set of sustainability objectives and targets would include health, crime, training, business support and many others. Those used for the purposes of RPG are likely to be more limited and their precise scope should be regionally determined. It is important to recognise that any objectives have limitations but to work with them in a whole-hearted way, amending them when there is sufficient evidence to justify change.

3.10 Although its coverage may be incomplete, this set of objectives and targets is already longer than would be ideal for RPG and appraisal purposes. The list can be refined to reflect the particular priorities in a region, and hopefully will be reduced as it becomes possible to pinpoint and remove those targets against which the performance of RPG cannot be identified as the development of the draft RPG and the appraisal proceed.

3.11 In devising a set of objectives and targets, there are significant difficulties in categorisation, not least because of the interconnectedness of the four themes. So, for example, targets for integrated transport systems help to meet objectives for both environmental protection and social progress. In order to avoid duplication, a target is included under one objective only.

### **Getting the targets quantified and 'right'**

3.12 If the goal of achieving more sustainable development is going to really influence actions, then targets need to be aspirational. They also need to be rooted in reality. A first step is to recognise national targets where these exist and then, secondly, to explore their regional interpretation. In setting a target for renewable energy, for example, a region will begin with the assumed national target of 10% of supply from renewable sources by 2010.

A region with good potential for wind energy and/or hydro-electric power, or a significant commitment to the use of biomass, however, may decide to go beyond this and work with a target of 25% of supply by 2016.

3.13 In other cases there may not be more than a rough 'ball park' idea of what a target should be. The first target chosen may well be 'wrong' and this needs to be acknowledged. However, progress towards targets will be monitored and will show whether the chosen level of the target is right. If necessary, adjustments can be made, frequently done by either extending or reducing the time horizon.

3.14 There will almost certainly be situations where it is not possible for a quantified target to be set. Background studies may need to be undertaken before this can be done. Meanwhile, the targets should be expressed in terms of 'directions

of change'. Thus, for example, a region might decide to include quality of life under objectives for social progress, but may not be able to express this in terms other than 'improving'.

## Who benefits?

3.15 The question of 'who benefits?' can be an important basis for any evaluation. The appraisal process set out for RPG does not address this question in detail. However, there may be situations where some disaggregation of impacts by different groups would be appropriate, particularly where there are conflicts to be resolved. Such a disaggregation might include for example, residents, employees, employers, unemployed, visitors, young people, the elderly, and non car owning households (as a proxy for the socially excluded).

3.16 How such an element of appraisal would be done would vary with the required level of detail, the availability of relevant data, and the geographical specificity of the matters being appraised. The most likely approach is a commentary on both short and longer term impacts, in so far as they can be estimated, for each chosen group.

**Figure 6: Illustrative objectives and targets for use in the sustainability appraisal of RPG**

Sustainability Objectives	Targets and directions of change
<b>Maintenance of high and stable levels of economic growth</b>	
To encourage and accommodate the maintenance of a steady rate of economic growth	<ul style="list-style-type: none"> <li>- achieve stable long run average growth (in regional GDP) of x% pa</li> <li>- achieve stable employment growth (y% pa)</li> </ul>
To provide for good accessibility to and movement of goods by businesses within the region	<ul style="list-style-type: none"> <li>- all new sites for industry and commerce to be within x00m of a satisfactory public transport service</li> <li>- x% of new office floorspace to be within town or city centres</li> <li>- all new sites for manufacturing and distribution to be within x km of a freight interchange facility</li> <li>- reduce lost time to x% of total travel time by 20??</li> </ul>
To encourage and accommodate the expansion of selected economic sectors involved with advanced manufacturing and exports	- achieve a continued supply of strategic sites for advanced manufacturing and export services in broad location to be referred to in RPG

<p>To encourage stronger linkages between firms and the development of clusters and specialisms within an area</p>	<p>- achieve a continued supply of suitably located sites to facilitate the emergence of clusters</p>
<p>To build economic activity on local strengths</p>	<p>- achieve an adequate supply of available employment sites local to all areas, including small settlements</p>
<p><b>Social progress which recognise the needs of everyone</b></p>	
<p>To find a balance in the distribution of population, employment and housing</p>	<p>- match housing provision to employment growth at the sub-regional level</p> <p>- increase the accessibility to housing for household needs arising within communities and for economic migrants</p>
<p>To reduce disparities in income, and access to jobs, housing, and services between areas within the region and between segments of the population</p>	<p>- implement regeneration programmes in all areas in the top quartile for the region for relative multiple deprivation by 2016</p> <p>- reduce unemployment in defined priority areas to x% of the national average by 20??</p>
<p>To ensure good accessibility to jobs, facilities and services</p>	<p>- x% of population to be within x00m of a satisfactory public transport service by 20??</p> <p>- y% of population to be within x00m of a primary school by 20??</p> <p>- z% of population to be within xkm of a hospital providing A &amp; E services by 20??</p>
<p>To provide decent housing for every household requiring a home- match of housing provision to assessed need</p>	<p>- match of housing provision to assessed need</p> <p>- x% change in mix of house types</p>
<p><b>Effective protection of the environment</b></p>	
<p></p>	

<p>To maintain and enhance the quality and distinctiveness of the landscape</p>	<ul style="list-style-type: none"> <li>- reduce the loss of countryside valued for its intrinsic quality</li> <li>- reinstate and increase strategic landscape features</li> <li>- halt the loss or fragmentation of 'tranquil areas'</li> </ul>
<p>To make towns and cities more attractive places to live</p>	<ul style="list-style-type: none"> <li>- maintain and improve quantity and distribution of open space with an amenity value (no net loss)</li> <li>- reduce the number of households affected by ambient noise above n dBA by xx% per 5 year period</li> <li>- reduce volume of traffic by yy% per 5 year period</li> </ul>
<p>To maintain and increase biodiversity</p>	<ul style="list-style-type: none"> <li>- halt damage to internationally and nationally and designated sites</li> <li>- meet regional Biodiversity Action Plan targets for species x, y and z by 20??</li> <li>- add to the stock of wildlife habitats at every level from regional to community</li> </ul>
<p>To maintain and improve the quality of ground, river and sea waters</p>	<ul style="list-style-type: none"> <li>- reduce length of non-compliant river stretches by xx% by 20??</li> <li>- increase proportion of bathing beaches meeting (which standard?) to yy% by 20??</li> <li>- reduce incidents of groundwater pollution to n per year by 20??</li> </ul>
<p>To improve atmospheric integrity and air quality</p>	<ul style="list-style-type: none"> <li>- achieve air quality targets in full (CO<sub>2</sub>, particulates etc)</li> <li>- achieve shift to x% of trip/km by walking, y% by cycling and z% by public transport by 20??</li> <li>- reduce vehicle based distance travelled by xx% per 5 year period</li> <li>- increase proportion of freight movement by rail starting and/or finishing in the region by y % per 5 year period</li> <li>- increase woodland cover to w% by 2016</li> </ul>
<p><b>Prudent use of natural resources</b></p>	

<p>To reduce consumption of undeveloped land</p>	<ul style="list-style-type: none"> <li>- reduce amount of greenfield land outside settlements built on per 1000 additional households to xx% of the 1998 figure by 20??</li> <li>- increase average residential densities in all new developments to a regional average of xx% by 20??</li> <li>- increase provision of additional dwellings through conversion and reuse of existing building stock to cc % by 2016</li> <li>- reduce annual loss of flood storage to nil by 20?? To maintain the long term productivity of agricultural land and use it more sustainably</li> <li>- reduce irreversible loss of all agricultural land to xx% of the 1998 figure by 20??</li> </ul>
<p>To use agricultural land more sustainably</p>	<ul style="list-style-type: none"> <li>- halt loss of following semi-natural habitats to agricultural intensification by 2006. <ul style="list-style-type: none"> <li>- aa wetlands</li> <li>- bb downlands</li> <li>- cc downlands</li> </ul> </li> </ul>
<p>To promote a move up through the waste management hierarchy</p>	<ul style="list-style-type: none"> <li>- achieve a reduction in commercial waste for disposal of cc % of 1998 level by 20??</li> <li>- reduce amount of domestic waste disposed of by landfill by dd % from 1998 level by 20??</li> <li>- recover rr kw of energy from waste by 2016</li> </ul>
<p>To reduce consumption of minerals from primary sources</p>	<ul style="list-style-type: none"> <li>- reduce extraction of sand and gravel by xx% per 5 year period</li> <li>- reduce extraction of crushed rock by yy% per 5 year period</li> <li>- reduce extraction of building stone by zz% per 5 year period</li> <li>- increase contribution of recycled and secondary aggregates to aa% of total consumption by 20??</li> </ul>

To ensure that water is efficiently used to meet needs whilst reducing environmental impact and resource depletion	- extend use of grey water to x% of residential properties and y% of commercial property by .... - reduce to zero by 20?? all new development which would mean damage to river flows, new reservoir construction or significant aquifer depletion
To promote the prudent use of energy from finite sources	- increase use of renewable energy sources (xx% of supply by 2016)

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### **CHAPTER 4 Sustainability scoping of RPG**

#### **Task**

4.1 The task of sustainability scoping is to check that the relevant RPG covers the range of sustainability concerns appropriate to regional planning. It is not concerned with the quality of thinking - that is the task of other stages in the appraisal. It simply aims to ensure that nothing important gets missed out. In so doing it is an essential part of getting policies for sustainability into the strategy.

#### **Using a scoping framework**

4.2 Use of a framework matrix enables the sustainability objectives and targets referred to in chapter 3 to be used as a checklist for the contents of RPG. The strategy is examined to ensure that no aspect of the four themes has been omitted. An example is set out in Figure 7.

4.3 Separately recording both strategic objectives and policies (see worked example at Figure 7), has the added value that it enables the scoping exercise to reveal the degree of consistency within the strategy. This is a secondary objective of scoping. If an issue is covered by a strategic objective of the strategy, then it should also be covered by policies which support that objective. Separate recording ensures that this is the case or reveals when it is not.

4.5 The comments box can be used to flag up any omissions. It is not intended to be used for making detailed recommendations because the qualitative aspects of the appraisal come later. However, it could be used to comment on matters which should be tracked through the next stage of the appraisal in order to ensure that identified problems are rectified.

#### **Scoping as part of the on-going process**

4.6 As the appraisal progresses and the strategy itself is modified, scoping should

be repeated to check that the coverage remains consistent with regional sustainability objectives. It can also become one means of recording the changes that the strategy undergoes. Later matrices can be compared with earlier ones to record both positive and negative changes. This can be repeated periodically, as frequently as required. The sequential matrices provide a transparent 'audit trail' of the strategy's progress.

4.7 The final scoping exercise may well still reveal omissions. At this stage the reasons for such omissions should be recorded where these are known.

<b>Figure 7: Proposed Scoping Framework</b>				
<b>Prudent use of natural resources</b>				
Objectives	Example targets:	Relevant policies in RPG		Comments
		Strategic objectives	Policies	
To reduce consumption of undeveloped land	- reduce greenfield land take to x% of total by 20-	SP2	P21, P22	Well supported in principal. No disaggregation to sub-regional level
	- increase average residential densities in all new development	SP2	P24, P27	No detailed policy on different levels of density for different types of development
	- reduce development in vulnerable flood plains to nil by 2016	SP3	P11	Well supported
	- increase additional dwellings from conversion and reuse to x by 2010	-	-	No objectives and no policies - track

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### CHAPTER 7 Recording and reporting findings

#### Overview

7.1 In any appraisal, the question of how much to record and at what level of detail is always a major challenge. Too much disaggregation and detail risks overloading the appraisal and, ultimately, the decision makers. Yet at the same time, one purpose of appraisal is to make more transparent the trade-offs and decisions that have to be made.

7.2 Much of the appraisal flowing out of the proposed methodology is at least partially qualitative and relies on the judgement of the appraiser. For this reason the approach promoted is one which makes use of text entries to the appraisal framework rather than relying solely on a system of symbols. Often the issues raised by the text will result from 'thought association' rather than directly from the appraisal framework. Such associations are frequently very valuable, making inter-connections between different areas of impact which a symbols only appraisal would not bring out.

7.3 However, a negative consequence of this is that the appraisal generates a significant quantity of paperwork. As a general principle this should be kept to the minimum possible, but it needs to be sufficiently full and thorough to enable the thought processes and decisions to be followed. Achieving this in a sensible manner can be helped by recognising that the output from the appraisal (the paperwork) has two purposes:

- recording the findings from the appraisal as it progresses, as a management tool; and
- reporting the findings in order to inform the strategy makers and other interested parties.

#### Recording findings

7.4 The recording of findings need to be systematic and orderly. In the majority of

instances hand written records as the appraisal proceeds are sufficient. Proper recording of dates and findings will enable them to be revisited in the future.

7.5 A brief summary note at the end of each step in the appraisal which describes the methodology and distills the key findings will assist with the task of maintaining proper records.

## Reporting findings

7.6 In the iterative process envisaged between appraisal and strategy making, rapid response

is likely to be important. If strategy making stops because an appraisal report is being prepared which has to be checked, edited and agreed, then both the creativity and the momentum will be lost. Experience gained from environmental appraisal suggests that, through much of the process, significant benefit can be gained from regular meetings between appraisers and strategy makers. Face-to-face, emerging findings can be explored and ways of removing negative impacts and developing ideas for mitigation explored.

The hand written records can be available for informal, joint inspection as required.

7.7 At some stages in the process, however, more formal reporting of findings will be required. As a minimum, these stages are:

- (i) comparative appraisal of strategic options, prior to a choice being made;
- (ii) an appraisal of the finally selected option;
- (iii) appraisal of draft RPG prior to its submission to the Secretary of State;
- (iv) appraisal of Secretary of State's proposed amendments to RPG;  
and
- (v) if different from (iv), appraisal of final RPG.

7.8 The above assumes that the appraisal process will continue right through to the process of issuing final RPG. However, the appraisal team for stages (iv) and (v), although still independent, will be different from that for the earlier stages following the transfer of the RPG process to the Secretary of State.

7.9 The findings will be used to inform a wide range of other audiences, for example members of planning conference or relevant external audiences, such as RDAs, environmental bodies or other commentators on strategy content. For this purpose a formal statement of the current performance on the strategy and policies is required. The suggested matrices set out in the previous chapters provide a basis for doing this.

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### **CHAPTER 8 Monitoring and evaluation**

#### **Tasks**

8.1 This report has as its main focus the development of a methodology for the appraisal of RPG. There are, however, clear links to be made from the appraisal process to monitoring the performance or effectiveness of the planning guidance, and to a subsequent evaluation of planning outputs and outcomes. The three processes will follow one another over time and will influence each other. The monitoring process will flag up areas where the RPG is not performing to expectations, and will raise issues which will need to be addressed in a subsequent evaluation. The results of the evaluation will be fed into subsequent round of RPG making, and so on.

8.2 Conceptually, the processes of appraisal, monitoring and evaluation are quite distinct and the methodologies adopted will reflect the different agendas and purposes.

#### **Appraisal**

8.3 A sustainability appraisal is essentially a process of assessing the probable future impacts of the various components and policies of a strategy or of planning guidance, and of the cumulative effect of the whole strategy on a range of broad sustainability objectives and targets.

#### **Monitoring**

8.4 The monitoring process will focus on actual strategy performance against these broad sustainability objectives and against other strategy objectives if these are different. Monitoring involves a series of 'snapshots' over time. It is important to select an appropriate range of indicators which help to illustrate whether the objectives are

being achieved.

8.5 The indicators may be the same as, or similar to, the targets specified in the strategy or used in the broad sustainability objectives, or they may be different. For example, the broad sustainability objective may be to improve atmospheric integrity and air quality in a specified way, the target might be to reduce the number of vehicle based journeys, and the monitoring indicator used might be the incidence of pollution-related respiratory ailments

8.6 Identifying appropriate indicators is a final part of the appraisal process and will reflect the individual circumstances and priorities of each region. Wherever possible, such indicators should make use of available data. However it is important to recognise that, for the purposes of strategy monitoring and the later stage of evaluation, an indicator is only appropriate if it genuinely links to the intended purpose of the objective.

8.7 Ideally only one indicator should be chosen for each target in order to make the data collection and handling more manageable. Too many indicators pursued with insufficient clarity about what they actually reveal will tend to lead to disillusion with the monitoring process. The Department aims to publish good practice guidance on targets and indicators later this year or early next (see para 3.7).

8.8 Evaluation essentially involves looking back over time to see whether, and to what extent, the desired objectives have been achieved. Because evaluation is complex and costly, it is usually performed infrequently and at a time related to the stages in the planning process. Ideally, performance of the strategy would be evaluated against all of the main objectives, both of the strategy itself and the broad sustainability objectives. In some cases, specific research is likely to be needed to develop the database by which the strategy performance can be assessed.

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### CHAPTER 9 Implementing the approach

#### An incremental approach

9.1 The goal of sustainable development lies at the core of a sustainability appraisal. It reflects the desire of government to see the objectives of sustainable development incorporated into every policy and programme. At the regional level there are two ways to pursue this. The first is through the incorporation of good practice for achieving more sustainable development as currently understood. The second is to carry out a sustainability appraisal.

9.2 Sustainability appraisal is a complex and challenging task. It is therefore important to recognise that a first crucial step to putting sustainable development at the centre of RPG should be to ensure that current best practice is incorporated into the guidance.

9.3 For these reasons a two-stage approach is proposed. The first stage is a mini-appraisal, focused on getting best practice into RPG. The second is a full sustainability appraisal. These are shown in figure 11.

<b>Figure 11: Mini and full sustainability appraisals</b>		
<b>Suggested steps</b>	<b>Mini sustainability appraisal</b>	<b>Full sustainability appraisal</b>
identify sustainability objectives, targets and indicators	✓	✓
baseline studies address sustainable development	✓	✓
scoping	✓	✓
appraisal of strategic options	-	✓
appraisal of policies	-	✓

\* baseline studies not strictly part of the sustainability appraisal

9.4 The approach to the identification of sustainability objectives and targets, to baseline studies, and to scoping would be the same for all RPG, with appraisal of options and policies only taking place when a decision to pursue that approach had been agreed.

9.5 The appraisal process for both options and policies is based on the assumption that RPG is in a form which accords with draft PPG11 and is therefore sufficiently specific to be appraised. However, this may take time to achieve and indeed may be more easily achieved in some aspects of RPG than in others. Where RPG remains discursive, aspirational and unquantified, the mini-sustainability appraisal is recommended. It is anticipated by the Department that, as RPG evolves in response to the new PPG, the need for a mini as opposed to a full, appraisal will diminish.

### **Baseline studies and sustainable development**

9.6 All baseline studies for RPG address matters relevant to sustainable development. Ways of starting to shape such studies to more clearly address the sustainable development agenda are now starting to emerge from planning practice. This is discussed in Annex 1.

### **Application of the approach to other aspects of regional policy**

9.7 Regional policy is developing apace through many different bodies. Already the RDAs are expected to undertake a sustainability appraisal of their strategy.

9.8 The methodology set out in this document has a number of important and transferable features:

- it promotes the use of the four themes of sustainable development, recognising the importance of economic, social and environmental objectives;
- it is rooted in an approach based on a regional set of sustainability objectives to which all significant regional partners are committed; and
- it is quantified and linked to monitoring which enables effective policy review.

9.9 As such, it has the potential to form the basis for other appraisals at the regional level.

To achieve this, the scope of the objectives and targets would need to be widened to more fully reflect the whole scope of the regional agenda for sustainable development

9.10 Undoubtedly some of the policies will be hard to appraise because they are insufficiently specific. However, if appraisal of economic development, biodiversity or health plans and programmes proceeds in the same way as the

appraisal of RPG, the net outcome would be to promote the development of more focused policies of greater clarity than would otherwise be the case.

9.11 The extent to which the policies ultimately perform better in terms of sustainable development will depend on the extent to which the promoters of the policies or strategy are committed to the principles of sustainable development. This is as true of an RDA strategy as it is of RPG. Appraisal can only draw attention to likely performance. Decision making rests elsewhere.

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### **ANNEX 1**

### **Sustainable development and baseline studies**

#### **Embedding sustainable development into RPG**

A1.1 A sustainability appraisal integrates thinking about sustainable development into RPG. Potentially equally important for the prime task of embedding sustainable development into RPG is ensuring that the baseline studies which underpin the development of the strategy incorporate thinking relevant to sustainable development from the outset.

A1.2 The judgements reached about the social, economic and environmental implications of RPG options and policies depend fundamentally on the availability of robust and consistent baseline data sources at the regional scale. Currently, inadequate baseline data (poor quality or incomplete coverage at regional level) is a major constraint both to effective strategy making and to detailed appraisal.

A1.3 Baseline studies need to be based on information comparable across the region and be capable of disaggregation to an appropriate sub-regional scale. For particular topic areas (for example, biodiversity, economic activity, water quality, transport) relevant agencies will be involved in the collection and analysis of data at a regional level for input into RPG and other regional baseline studies.

A1.4 Desirable characteristics for regional baseline studies include the following:

- promoting thinking which reflects specific regional characteristics rather than the application of national thinking;
- developing approaches which promote integrated thinking (ie combine social, economic and/or environmental aspects) rather than compartmentalised approaches;
- utilising an approach which can be consistently and progressively developed to different levels of detail to reflect the emerging requirements of strategy preparation at regional and sub-regional levels and then subsequently at local levels as development plans are prepared; and

- introducing consistency which allows key issues and key opportunities to emerge, judged against a common set of criteria.

A1.5 Two approaches currently appear to have the potential to bring these characteristics to baseline studies, though neither currently seems to have the potential to deliver them all.

## **A characterisation and capital approach**

A1.6 The draft of PPG11 draws attention to the potential value of landscape characterisation when combined with evaluative approaches such as 'environmental capital'. The concepts of characterisation and capital are based on work sponsored by the four statutory environmental agencies (Countryside Commission, English Nature, English Heritage, Environment Agency) which developed a characterisation-based approach to the evaluation of environmental capital. Draft PPG 11 anticipates that this work has the potential to help guide regional development to areas that are most suited to receive it. Such an approach can be used as a positive spatial planning tool, highlighting opportunities as well as providing an improved justification for constraining development in the most sensitive areas in regional terms.

A1.7 To date, the approach is best developed with respect to the environmental aspects of the sustainable development agenda, especially those relating to environmental protection. The concepts of characterisation and capital are being used to improve understanding of the key benefits, functions or services (i.e. capital) of an area's environment.

A1.8 The advantages for appraisal are that it provides a consistent baseline of understanding about the region's environment which flows from the questions:

- what have we got now?
- what benefits does it bring and why do these matter for sustainability?

An appraisal goes on to ask what impact the relevant option or policy would have on these benefits.

A1.9 The approach continues to be developed. It has the advantage that it can be used broadly at the regional level to start off with, providing a framework for increasingly more detailed studies at smaller spatial scales (ie sub-regions and below) within a region.

A1.10 The approach may prove to be a useful means for improving understanding of the key benefits, functions or services of the region in economic, social and transportation terms. If it could be applied consistently to all regional baseline studies, it would enable relevant information and issues to be better 'cross-fertilised' between studies thus encouraging a more integrated approach to both strategy making and appraisal.

A1.11 It has to be recognised, however, that currently it has limitations. It is asking

valuable questions and providing a good conceptual framework, focusing on what is most relevant and valuable to the region. It does not, however, as yet significantly help to answer 'so what?' type questions. It remains essentially descriptive whereas economic and social baseline studies are seeking to understand dynamic relationships, for example why certain firms are clustering near research institutes and how their networks and growth prospects might be affected by different growth and spatial development scenarios. An environmental capital approach, therefore, is only a partial tool.

A1.12 Notwithstanding this, the findings of baseline studies which had been led by a characterisation/capital approach have the potential to provide a robust starting point for considering what change might be desirable in the future, both for the region as a whole, and for specific sub-regions, based on their opportunities and constraints as revealed by analysis of their social, economic, environmental and land-use/transportation characteristics. As an approach which promotes the identification and mapping of geographically specific sub-regional areas with common or consistent characteristics, it brings significant advantages. Only by being more locationally specific can the type of issues that distinguish one region from another and one sub-region from another start to become apparent.

### **Making use of the four themes of sustainable development**

A1.13 The appraisal methodology promoted in these guidelines makes use of the four themes of sustainable development set out in 'A Better Quality of Life'. These provide a clarity and a structure which will help to achieve greater familiarisation with the concept of sustainable development. There is the added benefit in using these themes of the potential for greater consistency between different, but related, work which addresses the agenda of sustainable development, for example regional economic development, health and biodiversity planning.

A1.14 There would be considerable advantages for the appraisal, and for RPG, if a common approach can be adopted wherever it is necessary to categorise or group issues. The four themes are a good common basis around which to work.

A1.15 The application of this co-ordinated approach can begin right at the start of making the regional strategy. Where baseline studies are undertaken for strategy preparation or for use in monitoring, these normally follow a conventional topic approach. State of the environment studies are the most frequently encountered form of baseline study, describing and quantifying where possible the environmental stock of an area. Transport studies detail the nature and use of the various networks.

A1.16 Topic based baseline studies of this type may seem to be logical, and to reflect the division of responsibilities within planning bodies and the structure of most planning policy documents. The danger is, however, that assembling information on a topic basis compounds compartmentalisation, making integration harder to achieve, and the questions relevant to sustainable development harder to

address.

A1.17 Though conceptually more difficult, beginning with baseline studies which establish a start-date inventory of a region's performance in terms of economic activity and assets, social conditions, environmental capital and resource use (from within and beyond the region) will start the planning process off in the right direction and assist with subsequent monitoring. Preparing baseline studies in this way will require different ways of thinking and working but ought to be possible.

A1.18 As an example of thinking differently, the box in figure 12 shows how matters that would hitherto have been part of a transport study could be divided between, and become part of, studies structured along the four themes of sustainable development.

**Figure 12: Using the four themes of sustainable development for base-line studies - a transport example**

Maintenance of high and stable economic growth

- hierarchical transport networks designated to strategic, distributor and local access networks
- develop congestion indices for key sections of strategic networks: lost time as a proportion of total time can either be estimated or extracted from a model
- regional road network model provides total vehicle hours in base situation

Social progress which recognises the need of everyone

- public transport accessibility indices developed for urban and rural areas
- identify transport deficiencies in relation to development opportunities
- accessibility of major recreational/tourist attractions
- accident levels on defined networks for the main modes of travel

Effective protection of the environment

- existing level of vehicle/km (person/kms) on designated network(s) by mode
- level of emissions from designated network(s) by CO<sub>2</sub> particulates, other pollutants from traffic
- freight (tonnes) lifted and dropped in the region by mode, including composite journeys (road/rail, road/water)
- develop indicators (indices) to categorise level of transport integration

Prudent use of natural resources

- estimate use of new materials for new transport infrastructure and for maintenance
- estimate proportion of recycled material used for transport infrastructure
- level of CO<sub>2</sub> emissions from road traffic sources

- current use of low/zero emission vehicles.

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### **CHAPTER 5 Appraisal of the spatial strategy**

#### **Context**

5.1 The spatial strategy is the most important part of the regional strategy, and it is vital that

it is subject to a sustainability appraisal. With a plan-led system, it is the spatial strategy that puts the guidelines into place which, when followed through subsequent development plans, will determine how and where a great deal of regional change is to take place. This change, by virtue of its scale, presents a significant opportunity for achieving a worthwhile contribution to the objectives of sustainable development. The role of the sustainability appraisal is to help identify ways in which the spatial strategy can best make that contribution.

5.2 Though RPG is to contain a spatial strategy, there is no established and widely followed approach to its preparation. This means that interpretation of this guidance on appraisal will necessarily involve tailoring the appraisal to the approach to RPG preparation adopted in each region.

5.3 It is not the task of this guidance to offer good practice advice on the preparation of RPG. In general, however, among the various approaches which have been followed in the past, two in particular stand out:

- either, making distributions of housing and employment growth (decline) to sub-regions in accordance with the strategy objectives and sustainability constraints and then working within the sub regions to develop and test options for accommodating the proposed changes, including reiteration of the overall distribution as appropriate;
- or, working with components of development eg growth or regeneration points, testing each of these individually, and then combining the best of them in various options in order to meet the development requirement and the varying needs within the sub-regions, again taking account of sustainability constraints.

In both approaches there will be stages of iteration.

5.4 Whatever the details of the approach adopted, preparation of the spatial strategy will need to make use of sub-regions. This enables:

- the varying nature and needs of different parts of the region to be reflected in the strategy and expressed through sub-regional planning targets;
- the process of identifying and making choices in the spatial strategy to be more manageable; and
- the implications of the spatial strategy for strategic planning areas to be more readily interpreted.

5.5 The most appropriate basis for identifying sub-regions is functional areas such as city regions, represented by travel-to-work areas, or environmental character areas. Whilst practical considerations may suggest the use of administrative areas, these should be avoided, at least in the early stages of strategy formulation, since administrative boundaries can reduce the opportunities for creative thinking and planning.

5.6 Throughout the formulation of the spatial strategy, an independent sustainability appraisal is used to inform choices that have to be made. It is one of the influences on the RPB in making the strategy. Other influences will be the views of other stakeholders through successive rounds of participation, and the evaluation of alternatives against the other criteria which the adopted strategy will have to meet. This latter task is undertaken by the strategy makers.

5.7 The evaluation of options by the strategy makers is likely to consider whether an option is realistic, having regard to factors such as:

- the realism of the scale of population redistribution given existing and anticipated social and economic expectations;
- the amount of development to take place in the urban areas given what is known about urban potential;
- the feasibility of securing the proposed levels of regeneration;
- the ability of the proposed development to support the infrastructure and other costs involved;
- the ability of the housing market to bring forward the particular scale and form of development proposed in the identified locations;
- the technical feasibility of meeting the infrastructure and servicing requirements; and
- the attractiveness of the location to job-creating investors.

5.8 The sustainability appraisal should be separate and distinct from this evaluation, testing proposals only against the sustainable development objectives and targets.

## **Components of change within the sub-regions**

5.9 In order to develop a spatial strategy, it will be necessary to identify locations where there will be strategic change, and to define these in terms of:

- their scale (expressed for instance as numbers of dwellings, hectares of employment land, hectares for forestation or tonnes per year of waste disposal capacity);
- their broad location (for instance, closely related to a named city, in an identified quadrant, or within a corridor defined by infrastructure or topographical features); and
- their form (for instance, as areas of regeneration, peripheral additions, or nodes on a transport corridor).

5.10 There are potentially a very large number of alternative ways of handling change in a region, even once the overall level of change is established. The number is likely to be kept manageable in practice in the strategy making process by constraining the parameters of choice. The means by which options are constrained must be examined. One technique would be to apply environmental capacity constraints. However, this would be to rely on a selective interpretation of sustainable development although the concepts of environmental 'capital' and 'character' can have a part to play (see annex 1). Such matters should be exposed by, rather than exempt from, the sustainability appraisal.

5.11 From the appraisal point of view, the aim of generating options should be to achieve comprehensive coverage of the possibilities, so that the preferred options can be arrived at through a process of selection. The target is for subsequent refinements and modifications to be applied to an option from within the group that has been appraised rather than from generation of new options from outside the group which has therefore not been appraised on a comparative basis.

5.12 Whatever the approach taken to the generation of options, the appraisal is likely to involve two separate types of task. One is the appraisal of individual options (components or packages of development) in order to understand their performance and any opportunities for improvements and/or mitigation. The second is the comparison of alternatives.

## **The sustainability appraisal of options**

5.13 The method proposed for ensuring that the sustainability appraisal of individual options is systematic, and is open for scrutiny, involves the completion of a framework of the type illustrated in figure 8. The features of this approach are:

- the requirement to examine each option under consideration against each and every sustainability objective;
- a combination of a simple and easily scanned representation of impacts and contributions, with the opportunity to explain the view arrived at through a commentary; and
- the provision of the basis for comparing alternatives.

5.14 Performance is summarised against a defined level of impact, expressed in terms of the strategy's ability to deliver sustainable development. Levels of impact are:

- negative effect, where the expected impact of a strategy would move behaviour, or land-use patterns, in a direction which opposes that needed for the achievement of the objective in question;
- no clear effect (neutral)
- positive shift in behaviour (some improvement) where the likely impact of a strategy will be to shift the behaviour or land-use patterns in a direction that makes the achievement of a sustainability objective more likely; and
- laying the basis for sustainable development (positive effect); achieving this level requires a strategy to have such an influence on behaviour or land-use patterns that it facilitates and encourages the achievement of the objectives in question.

<b>Figure 8: Use of the framework to appraise a spatial development option</b>					
<b>Option for RPG: Strategic development area closely related to City A to accommodate 4000 dwellings and 80has of employment land</b>					
SD Objective	Performance of option				Commentary
	-ve	neutral	some good	+ve	
To provide for good accessibility to and movement of goods by businesses				✓	New employment sites could be well located to a major centre and to regional transport network
To increase regional economic autonomy, with an increase in the value added to goods		✓			Contributes nothing to this objective
To reduce disparities in income, and access to jobs, housing, and services between areas within the region and between segments of the population				✓	- increases supply of employment opportunities within reasonable distance of an area with high levels of unemployment, and good prospect of public transport services - development on a substantial scale is conducive to the provision of range of facilities and mixing of uses

To maintain and enhance the quality and distinctiveness of the landscape	✓				Could be sited to avoid loss of area of landscape which is not of particularly high quality, but which is valued for its accessibility to large numbers of people
To maintain and increase biodiversity	✓				Some scope for planned avoidance mitigation and management, but likelihood is loss of some habitats of local importance
To reduce consumption of undeveloped land	✓				Likely, depending on site location, to involve development of greenfield land, though loss reduced by high density requirements
To promote a move up through the waste management hierarchy			✓		Substantial development provides the opportunity for effective recycling, and for inclusion of combined heat and power (CHP) schemes fuelled by waste
To promote the prudent use of energy from finite sources			✓		Opportunity for designing according to good practice on energy conservation, and to increase efficiency of energy consumption through CHP

5.15 It is an important feature of the framework that it requires completion of the commentary box as well as of the summary of performance. This commentary box has two purposes. First, by setting out the reasoning for the judgements made, it promotes transparency and aids users of the appraisal documentation. Secondly, it provides an opportunity to record opportunities for enhancement or mitigation. Through the systematic application of a consistent approach, which is arrived at by use of the framework, it is possible to develop the appraisal to varying degrees of sophistication. This can vary from taking the consensus view of an expert group on the 'change of direction' which the promotion of a given option would bring about through to the construction of a complicated land-use/transportation model.

5.16 The ability to compare options is important in undertaking an appraisal. An option considered alone is likely to register many negative or harmful impacts, because development consumes resources, and is most likely to affect the natural

environment to some degree. The task for the appraisal goes beyond recording these impacts to guiding the spatial strategy to the 'best' overall choice. The question for the sustainability appraisal is which option performs better than others 'in sustainability terms'.

5.17 In figure 9, three examples of development options are considered to illustrate the proposed approach, bearing in mind that RPG should indicate broad locations or location criteria rather than being site specific. These are similar scales of mixed use development accommodated:

- through growth of a major existing regional centre, A;
- through a new medium sized settlement, B; or
- along the transport corridor between A and C.

5.18 The figure presents the performance of the options against the objectives in a comprehensive way. Wherever possible, the impacts and contributions have been quantified. This provides for more meaningful comparison between options, and offers some scope for relating the options to the targets.

<b>Figure 9: Comparative appraisal of options</b>			
	<b>Option X: Growth of major regional centre A</b>	<b>Option Y: Provision for a new settlement B (within 50 kms of centre A and town C)</b>	<b>Option Z: Growth in corridor between towns A and C</b>
<b>Maintenance of High and Stable Levels of Economic Growth</b>			
To ensure good accessibility to, and movement of goods by, businesses within the region	Likely to perform well because of good links to regional transport network	Likely to perform very well because could be well linked to regional transport network	Not likely to perform well because of indirect links to regional transport network, and investment in new links would be needed
To encourage and accommodate the expansion of identified growth sectors, biotechnology and precision engineering	Growth sectors both well represented in A, so good opportunity to enhance	Little benefit since unlikely that a new settlement in this part of the region would have growth sectors well represented	Will assist development of growth sector in A by providing for high quality sites

To support the diversification of rural economy	No discernible effect		
To encourage stronger linkages between firms and the development of clusters and specialisms within an area	Should perform well	No discernible effect	Long term possibility of creating benefit in C as well as A
To increase regional economic autonomy, and in particular to increase value-added within the region	No discernible effect		
To build on local strengths and add economic value locally	May be some benefit but difficult to make direct connection		
<b>Summary</b>	Option Z favoured because of better opportunities to bring forward high quality employment sites, though investment in new links will be needed		
<b>Social Progress Which Recognises the Needs of Everyone</b>			
To achieve a balance in the distribution of population, housing, employment and services	Little effect because balance already exists in A, and scale of proposal would allow balance to be maintained	Performs well because sub-regional imbalance could be assisted through emphasis on employment sites	Performs well as tendency towards amalgamation of A and C as one unit improves balance and maximises choice
To reduce disparities in income, access to jobs, housing, and services between areas within the region and between segments of the population	Town A contains significant numbers of low income families, and increase in job opportunities in accessible location should help	Low numbers of low income families in sub-region so little effect	A contains significant numbers of low income families, and increase in job opportunities in accessible location should help

To ensure good accessibility to jobs, facilities and services in the region	Assists accessibility because new population located near to major centre	Some assistance; depends on precise location of new settlement	Significant benefit to accessibility because new population located between two centres, and links between those centres improved, assuming investment in public transport
To provide a decent affordable home for every household	Potential to meet assessed housing need and achieve appropriate mix of house types		
To protect and improve the health of all residents and workers	No discernible difference		
To provide access for all the population to open space appropriate to needs	All options provide the opportunity to build in a linked network of open spaces		
<b>Summary</b>	Option Z favoured as providing the greater opportunity to assist both, existing communities assuming investment in public transport		
<b>Effective Protection of the Environment</b>			
To maintain and enhance the quality and distinctiveness of the landscape	Depends on precise location of where the growth is to take place. Impact on landscape which is locally valued but not significant at regional level Opportunities for strategic enhancement of landscape	Depends on precise location, but development likely to encroach on landscape area acknowledged as contributing to regional distinctiveness	Landscape of only local value, but hitherto protected from development to maintain a gap between A and B  Opportunities for strategic enhancement of landscape

To make towns and cities more attractive places to live	Growth will help support additional facilities and services	New settlement can be well designed and properly serviced, but makes no contribution to existing towns and cities	Growth will support facilities in both towns
To maintain and enhance biodiversity	Depends on precise location, but should be possible to avoid most important sites	Depends on precise location, but should be possible to avoid most important sites	Depends on precise location, but should be possible to avoid most important sites
To prevent any loss of flood water storage, and avoid increasing risk of flooding through indirect effects	No effect	No effect	Some flood storage, but should be sufficient area for development to take place without loss
To maintain and improve the quality of ground, river and sea waters	No source protection zones present in any of identified locations and no discernible difference generally		
To improve atmospheric integrity and air quality	Potential for savings by concentration on major centre, and for improvement to present patterns	As a new settlement, likely to worsen conditions	Potential for savings from facilitating use of appropriate transport, if investment takes place; without the investment car use would increase
<b>Summary</b>	Option Z favoured because of poorer landscape quality, support to both towns, and on energy savings from use of transport alternatives, if services provided		
<b>Prudent Use of Resources</b>			
To reduce consumption of undeveloped land	Depends on precise location, but potential for previously used site (MOD) to accommodate 25% of development	Unlikely that new settlement could avoid significant use of previously unused land	Depends on precise location but potential to make use of previously unused land

To promote more sustainable use of agricultural land	No discernible difference
To promote a move up through the waste management hierarchy	No discernible difference
To reduce consumption of minerals from primary sources	No discernible difference
<b>Summary</b>	Option X favoured on likely effect on transport patterns, and on take up of previously used land.

5.19 Two points need to be made however. First, given the geographical scale of RPG and its non site specific nature, quantification will often not be easy. The amount of land of different types generally cannot be known when the proposals are not site-specific, and the amount of travel associated with a given form of development can only be a relative judgement. Second, whilst quantification can assist in comparing the performance of different options against the same objective, it is necessary to guard against the tendency to only value what can be measured.

### Using the findings

5.20 The comparative appraisal tables assist the task of decision making by demonstrating which options perform well against each objective. In the worked example, (and in the particular circumstances of relative size, proximity, landscape quality and other characteristics assigned for the purposes of illustration), Option Z is favoured on three of the themes of sustainable development, whilst Option X is favoured on one. If the decision takers gave considerable weight to the proportion of previously used land included in the development, and to the maintenance of a gap between A and C, then Option X might be favoured over Option Z.

5.21 Combining those options which perform well into spatial strategy whilst discounting those that perform badly, is one way forward. A further way in which the appraisal of the options can assist is by indicating qualities which should be displayed by additional options that could be then developed, or ways in which options could be modified to improve their performance. In the example in the tables it is evident, for instance, that an improvement on Option Z would be achieved if there were sufficient land available which retained the benefits of proximity to the major population centre, but which was of lower landscape quality.

5.22 The example illustrates an additional point which ought to be addressed by a

sustainability appraisal. This is the importance of considering a long timescale. An option which would continue to perform well if growth or change also continue should be preferred to one that would not. Sustainable development is about time scales which may be greater than the 15 to 20 year period covered by RPG. In the example, the relative benefits of Option Z would be likely to increase as the scale of development between the two towns increased.

5.23 Ultimately, choices have to be made. A matrix will indicate which options have higher numbers of harmful impacts, or beneficial contributions. It is not suggested that the addition and comparison of these impacts will make the choice for the RPB. To do so would imply that every objective has equal importance or weight, and that every impact or contribution is of similar significance, and so should be scored equally. Neither of these is the case. Nor is there a 'universal' set of weights that can be attached to the sustainability objectives, or a proven and accepted way of scoring impacts and contributions.

5.24 There are, however, ways in which the sustainability appraisal could assist decision makers by making the process more manageable. These are more easily undertaken if the sustainability objectives against which the options are appraised are reduced in number.

A simple way of doing this would be to work only with the four themes of sustainable development, but this runs the risk of obscuring conflicts within the themes. An alternative would be to take just one key objective from each of the four themes that best represents the overall intention of the theme. Armed with a more manageable list of objectives, two potential approaches can then be taken.

5.25 First, the options can be placed in rank order according to their performance against the grouped objectives. This will be a matter of judgement by those undertaking the appraisal, with an explanation given. Having to decide on the relative merits of proposals is an informative exercise.

5.26 Secondly, the differences between options can be better explored by considering the effect of regarding each group of objectives as twice as important as the others. This enables exploration of changes in relative performance of the options as the priority given to the different objectives is changed. In so doing, it tests the robustness of the better performing options in the face of changed priority for objectives.

5.27 From the point of view of the sustainability appraisal, it would be appropriate for instance to give greater weight to those objectives concerned with the longer term, as the concept of inter-generational equity or futurity is a very important one for sustainability.

## **The regional transport strategy as an integral part of the spatial strategy**

5.28 RPG is to include a transport strategy. Integration of land-use and transport

planning requires that:

- the proposed disposition of new development should assist in bringing about desirable changes in transport patterns, such as a reduction in average trip lengths or per capita travel;
- any new transport infrastructure needed to bring about the proposed patterns of development is identified; and
- the transport proposals are directed at achieving the same ends as the land-use proposals.

5.29 Were the spatial strategy included in the regional strategy not to demonstrate a clear and reciprocal relationship between transport and land-use planning, this would be likely to perform badly in the sustainability appraisal.

5.30 The sustainability appraisal will, therefore, apply just as much to the transport element of the draft regional strategy as to the other elements. RPG is to include a spatial strategy based on an integrated approach to land-uses and transport and should be appraised as such.

5.31 At the regional level only the strategic and possibly the distributor transport networks would be in the option evaluation and assessment. This has two advantages; the computational requirements of the exercise are minimised and the effects of changes in options are easier to assess and evaluate.

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### **CHAPTER 6 Appraisal of policies**

#### **Expression of policies**

6.1 The rate at which changes in the preparation and content of RPG will come into being is currently unclear. The December 1998 draft strategy for the South East and the July 1998 consultation document for the South West, for example, both included specific policy statements rather than the previously common discursive approach. Where the RPG is discursive, the policy intentions/statements would have to be distilled prior to any appraisal.

6.2 It is clear, however, that draft PPG11 expects much more specific policy content from future RPGs. This accords well with appraisal, for the purposes of which specific policy statements are preferred (see box on following page).

#### **Appraisal of policies**

6.3 The general principle for the appraisal of policies is for each policy to be examined against each target for each sustainability objective. It is intended that an appraisal framework should be used (see figure10).

6.4 As with appraisal of options, the appraisal process involves a commentary which sets out the factors that have been taken into account and the assumptions made in reaching a view. Where the information needed to make the appraisal is not available, or where causal relationships are not understood, these should be recorded. The appraisal should also start the process of considering whether there are ways to refine the policy in order to remove or reduce negatives.

6.5 Again, like appraisal of options, there is also categorisation of likely performance against a defined level of attainment, expressed in terms of the ability of the policy as currently formulated to deliver sustainable development.

6.6 There will be many cases when this categorisation is not possible and these should be recorded as a 'don't know' or query. In addition there will be cases where

the policy cannot be categorised because the way it is worded means that its likely outcomes cannot be determined. This too should be treated as a query (see example below).

6.7 Policy appraisal is intended to be iterative. The example in figure 10 shows an early round of policy formulation when the appraisal commentary is starting to make comments on areas of weakness and the potential for improving performance. In subsequent iterations the recorded performance should improve and this provides the basis for an audit trail. The final commentary needs to set out in the overall commentary box at the bottom, as simply as possible, any evident trade-offs that have to be made if the policy as worded is adopted.

**Example:**

Problems appraising discursive approaches to policy statements

*Providing for the bulk of new development in the Region's cities and larger towns will assist in meeting sustainable development objectives and is consistent with the Government's overall approach to the location of development. This emphasises the need to encourage development in towns and cities and to discourage scattered development in the countryside. The Region's development plans should provide for development in accordance with these principles. Maximum use should be made of the opportunities to provide for housing and employment development in the Region's cities and main towns but this needs to be achieved without diminishing the particular environmental characteristics and qualities of such settlements and their settings.*

This guidance on the distribution of development is clearly worthy in its intention and accords with current understanding of sustainable development.

In terms of appraisal, however, it is not possible to appraise it, even with a commentary, in anything other than the most general terms because:

- there is no indication of what constitutes "bulk" - is it simply more than 50%, or does it imply substantially more?
- who is to decide what "bulk" means?
- there is no indication of which cities and towns are to make provision for development so no impacts can be explored
- the final sentence is open to local interpretation which would enable virtually every city and town to say 'not here'.

Draft PPG11 1 intends a clear and specific approach to policy statements in RPG. This would imply a policy statement along the following lines:

*The regions' 'principal urban areas' of aa, bb, cc and dd should be the prime focus of economic and housing development. In combination, they should accommodate X% of employment growth for the period 1996-2016. Conurbation ee has been specifically excluded from designations as a PUA because of significant environmental constraints which limit its opportunities for further*

*major growth both within and beyond the settlement boundary. "*

Whilst still an 'introductory policy (ie setting out the framework within which other policies such as those on increased densities and re-use of formerly developed land can rest), this policy statement is much more capable of appraisal:

- the broad balance between concentrated development in or adjacent to major settlements and development elsewhere is established, and its relationship to the potential for re-use of brownfield land can be explored
- the scale of growth in relation to economic needs (for growth to accommodate emerging clusters for regeneration) can be explored
- the broad location of growth with respect to transport infrastructure issues can be examined
- the location of growth with respect to strategic environmental constraints can be considered.

The next step is setting out the specific housing and employment targets for each of the conurbations (or their associated sub-regions), but this would be likely to form the content of a later policy.

## Appraising policies which set out criteria

6.8 Policies which set out criteria, against which proposals for development are to be considered, are expected to be increasingly found in RPG. Such policies can be very valuable, leaving to subsequent tiers of plan making decisions which should properly be made there. An example might be the form of a major development, its detailed location, and its relationship to its landscape setting. However, criteria based policies are not a substitute for strategic decision making, for example on the broad location and scale of growth within different parts of the region. A criteria based policy being used to avoid strategic decisions is likely to prove incapable of appraisal.

**Figure 10: Example extracts from a policy appraisal framework**

**Policy: The level of car usage should be reduced to ensure that aggregate regional car mileage in 2016 is no more than in 1998**

Appraisal criteria		Performance of policy				Commentary
Sustainable Development Objective	Sustainable Development Target	-ve	neutral	some good	+ve	

To protect & improve atmospheric integrity & air quality	reduce vehicle based distance travelled by xx% per 5 year period			✓		proposed policy moves in right direction (ie by halting current increases) but does not contribute sufficiently to meet regional target for <i>reducing</i> vehicle based movements
	increase proportion of freight movement by rail by y% per five year period		✓			no direct link
To maintain a steady rate of economic growth	achieve stable long run average growth in regional GDP of x% pa	?	?	?	?	impact on regional GDP of reducing car usage not known; issue needs to be monitored
	achieve stable employment growth of y% pa	?	?	?	?	any impacts on regional GDP could spill through into employment growth - monitor
	reduce unemployment in defined priority areas to national average by 2016	?	?	-	-	policy likely to disproportionately affect people seeking work or those with multiple jobs with unsocial hours at disparate locations; in rural parts of region lack of transport is already seen as the greatest barrier to employment; may need to have a supplementary policy which differentiates between urban and rural areas

To enable expansion of growth sectors in advanced manu & export services	increase % of total employment in targeted sectors from 18% to 24% by 2016	?	?	?	?	no direct link
	achieve continued supply of strategic sites for advanced manufacturing and export services	✓				R&D based clusters at Sunville and Anytown seeking greenfield expansions to match high corporate profile; potential locations have poor accessibility by public transport; restrictions on car usage without associated public transport provision will make delivery of successful sites very difficult; Amelioration possible eg through employer provided mini bus links to public transport nodes
<b>Overall commentary:</b> - needs information on how policy is to be delivered so that it starts to get some 'bite' - refer also to policy xx on rural transport						

6.9 When such a policy is appropriate, it needs to be appraised. The important thing for sustainable development is that the criteria reflect the sustainability objectives. It is proposed, therefore, that the criteria used are explored against sustainability objectives, looking for conflicts and important omissions.

### Cumulative impacts

6.10 Exploration of cumulative impacts is often set out as a target for sustainability or environmental appraisals, sometimes without any clear definition of what is meant by cumulative impact. At the RPG level, two different sorts can be identified:

- the combined impacts of all policies and proposals on specific areas; it may,

for example, be important to review spatial aspects of impacts through the sustainability appraisal to investigate 'hot spots' where there are repeated negative impacts; and

- repeated impacts on specific objectives and targets; these too can be considered as part of the sustainability appraisal.

6.11 Appraisal of individual policies is designed to explore their performance with respect to the objectives and targets for sustainable development. If several, or even many, policies negatively affect the achievement of a target (ie make performance worse), their effect needs to be explored since cumulatively they may lead to the crossing of thresholds.

6.12 The policy appraisal sheets provide the initial inputs for doing this. All negative performances, and unknown performances where negative impacts are suspected, can be assembled. From this, a number of questions can be addressed:

- are certain of the targets and their associated objectives in some way seen as 'less important' than others when decisions are being made?;
- does this iterative priority reflect the regional consensus reflected in the regional sustainable development framework?;
- is the cumulative impact of these negative effects such that progress will never be made towards certain of the specified objective?; and
- do ways of overcoming this need to be identified and the relevant trade-offs (if any) explored?

6.13 In this way, looking at cumulative impacts is exploring the implicit weighting that has been given to the objectives and targets. There is no 'magic' weighting being given which will facilitate difficult choices between 'apples and pears', but the issues are opened up for scrutiny and, if necessary, debate by decision makers.

6.14 This situation is one where additional illumination can be gained from addressing the issue of 'who benefits?' Are the identified negative impacts going to affect some groups more than others? Do the trade-offs that have led to the cumulative impacts always benefit the same groups? Once explored, are these priorities and trade-offs supported by the decision makers?

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In addition a wide range of appraisals of local and strategic plans and regional strategies are available.

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