

Preface

The Department of the Environment, Transport and the Regions is grateful to Baker Associates for producing their report, published in August 1999, which set out recommendations for a good practice guide on sustainability appraisal of Regional Planning Guidance. This good practice guide is based on Baker Associates' report. It refines that guidance, taking account of feedback from a series of regional seminars, and written responses on the feasibility of applying this guide in each region.

The Department endorses the objectives-led approach put forward by Baker Associates, which has already been applied to the appraisal of both draft Regional Planning Guidance and the Regional Strategies of the Regional Development Agencies. The Department is considering the scope for the sustainability appraisal of development plans in the light of the application of sustainability appraisal to RPG.

The main changes compared with the Bakers' draft report are:

- revisions to the sections on setting objectives and targets, and implementation;
- expansion of the advice on scoping and appraising cumulative impacts; and
- the section on baseline information has been brought into the main text, and revised, to acknowledge its importance.

The text has also been clarified in a number of places.

This guide will be kept under review. An important consideration will be the new EU Directive, when finalised, on "*The Assessment of the Effects of Certain Plans and Programmes on the Environment*". Until the Directive is finalised we cannot be certain whether any more appraisal work will be needed than that set out in this guide. Whether or not a separate document is required, the environmental findings will need to be pulled together to form the environmental report required by the directive. Once the Directive is finalised the Department will be issuing regulations applying it to England within the three year period for application of the Directive. The Department will also issue guidance on the requirements and methodology.

1. Introduction

Sustainability appraisals

1.1 PPG11, "Regional Planning" (October 2000) emphasises that Regional Planning Bodies (RPBs) should carry out a sustainability appraisal as an integral part of the preparation of draft Regional Planning Guidance (RPG). 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, by appraising the potential impacts of strategic options, consideration for sustainable development is ingrained in the strategy making process.

The new regional agenda

1.2 A key part of the regional agenda is the new regionally owned and transparent process for producing RPG, and its evolution into an integrated spatial strategy for the region. One aspect of this is that regional transport strategies are now an integral part of RPG. 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. Undertaking a sustainability appraisal, and thereby making use of common objectives, will assist in this integration.

Scope of this document

1.3 This document sets out guidelines which RPBs can use when preparing their sustainability appraisals. It aims to develop a methodology which is logical and consistent, while acknowledging that methodology and techniques will expand and improve as relevant practice develops over time.

1.4 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
- Chapter 10 provides advice on baseline studies.

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2 Approach To Sustainability Appraisal

Definition

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. Recommendations made during the sustainability appraisal are to be considered by the decision-makers; some recommendations may be taken on board while others may be rejected. 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 A sustainability appraisal of RPG can be expected to appraise:

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

2.4 The appraisal works alongside the strategy making process. The two should be independent but inter-linked. They must interact at appropriate stages in the development of the strategy (see para [2.10](#) below) if the appraisal is to help improve the overall performance of the strategy. An appraisal carried out after the strategy has been submitted by the regional planning body, or after RPG has been issued by the Secretary of State, serves far less purpose since it has not contributed to strategy development. However it does enable commentators to examine the performance of the plan, assists them in making their own comments and may contribute to future reviews of RPG.

2.5 The links between the strategy and the appraisal do not end once the strategy is complete. PPG11 emphasises that the effectiveness of the strategy should be monitored and its actual performance assessed. The criteria which have been used to appraise the strategy in its formative stages can form a basis for its monitoring.

An objectives-led approach to appraisal

2.6 Statements about sustainable development are often very general, and as such are of little value in an appraisal because everything depends on their interpretation. The methodology for appraisal, therefore, promotes precision through use of objectives and targets to define sustainable development benchmarks, against which the emerging regional strategy can be iteratively appraised.

2.7 An objectives-led approach makes use of clearly articulated objectives which are achievement-oriented and implemented through policies and proposals which, where possible, should be quantified by targets which can be measured. These are used as the basis for testing the strategy. In simple terms, the appraisal takes these as its starting point, as they define what is to be achieved in the name of sustainable development, and then assesses the likely performance of the strategy against them.

2.8 Three stages in objective setting can be identified:

- firstly, the objectives set out in the [Regional Sustainable Development Framework](#) (see Chapter 3) provide the context for the sustainability appraisal. These have to be expressed in a way that is sufficiently specific for RPG purposes to enable an effective appraisal to be undertaken. The RPB should take the responsibility for this during the preparation of the sustainable development framework, and subsequently for the development of any sub-regional objectives, in consultation with other regional stakeholders;
- secondly, the objectives have to be translated into policies and proposals which are supported by a tier of quantified targets or, where this is not possible, into intended directions of change; these targets become the benchmarks against which strategy content is judged; and
- thirdly, indicators have to be identified, to supplement the targets, so that strategy progress can be monitored.

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, specifying the desired direction of change in regional trends and conditions.

Target: an objective that seeks a specified desired end stated usually within a specified time-scale.

Indicator: measures of variables over time, defined by reference to targets.

Linking appraisal and strategy making

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

Figure 1: Relationship between objectives, targets and indicators (.pdf file size 8kb)

2.11 In its turn, the preparation of RPG involves a number of tasks. It develops a spatial strategy for the region and moves on to the development of the relevant policies to implement the strategy. Once issued by the Secretary of State, 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 (.pdf file size 6kb)

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 objectives and targets as the basis for appraisal. Finally it takes the targets and 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
(.pdf file size 6kb)

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](#).

Figure 4: Integration of appraisal and RPG preparation (.pdf file size 10kb)

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, i.e. 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.

It is important that sufficient time is provided for the process of appraisal. Although the methodology is relatively straightforward, thorough analysis can take time.

Changes proposed by the Secretary of State

2.15 The intention of appraisal is to ensure that the goal of sustainable development underpins the RPG. It would be inconsistent with that intention if changes were made by the Secretary of State to the draft RPG which did not take into account a region's aspirations for sustainable development 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 proposed changes stage. The required extent of the appraisal will depend on the significance of the changes. It is unlikely (though possible) that options would need to be re-appraised.

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. It will be for the Government Office, in the first instance, to decide whether and when a sustainability appraisal during this subsequent stage is needed and to manage it.

Indicators and monitoring

2.17 The choice of targets and indicators by which the sustainability performance of a strategy is to be monitored should be determined by, and linked to objectives that are specifically related to intent, rather than to description.

2.18 The number of indicators should be limited for practical and financial reasons, including potential information overload. They should be kept to a minimum, and an essential criterion is that data should be available at a reasonable cost. The Department will be publishing good practice

guidance on RPG Targets and Indicators at the turn of the year. 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 must be sufficiently specific in its policy intention to enable it to be appraised. Providing that the scope and nature of RPG is consistent with the advice set out in PPG 11, it should be capable of being appraised. 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.

2.20 In summary, RPG is expected to incorporate the following:

- a spatial strategy which is sufficiently specific to provide clear guidance on where development is intended to be located; the components of the strategy should have been subject to testing of alternatives;
- a regional transport strategy setting out priorities for transport investment and management which promotes the use of environmentally friendly modes through the better integration of transport and land use; and
- quantified targets, wherever practicable, at the regional and sub-regional level, such as housing provision, take up of employment locations, use of brownfield land, traffic reduction and modal split, and the protection and promotion of biodiversity, including the translation of international and national targets, such as for air quality and biodiversity, into targets for the regional and sub-regional level.

2.21 If RPG does not achieve this level of prescription then it is very difficult to appraise because the likely outcomes of its policy intentions cannot be determined.

2.22 It is recognised that fully meeting the requirements of PPG11 is likely to require more than one round of RPG preparation and that parts of the appraisal may 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 (see discussion of the role of the regional sustainability frameworks in Section 3).

2.24 It is unlikely that the team formulating the RPG can provide the necessary objectivity in the appraisal process because it is drafting the emerging strategy. It is therefore recommended that the appraisal be carried out by an independent team. The composition of this team will vary. In the case of the draft RPG 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. However, it is more likely to be carried out by an academic institution or a firm of consultants. One or two members of the strategy making team could 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 aim 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 accepting, 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.

3 Setting Appraisal Objectives, Targets And Indicators

Who defines the sustainability objectives and targets?

3.1 DETR published in February 2000 "[Guidance on Preparing Sustainable Development Frameworks](#)". It asks each region to develop and endorse its own objectives for sustainable development in a consensual and inclusive way. This is in accord with the UK strategy for sustainable development '[A Better Quality of Life](#)' (DETR, May 1999). These frameworks should be in place by the end of 2000 and frameworks have already been published in the West Midlands and the North West. They provide agreed regional objectives and targets to inform the preparation of regional strategies and programmes, and should provide the framework for the sustainability appraisal of RPG. Defining regional sustainable development objectives and targets in this way provides the necessary degree of regional ownership.

3.2 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 (SDF) need to be refined so that they provide the necessary spatial context for RPG purposes. This will be likely at the sub-regional level where different circumstances and characteristics will call for differing objectives and targets. RPBs should have regard to the Departments Good Practice Guidance on RPG Targets and Indicators, published at the turn of the year.

3.3 Where a SDF is not in place then the framework developed by Bakers and set out in Annex 1 will help, although this will not have the regional emphasis that the SDFs have, and is therefore far from ideal.

Who benefits?

3.4 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, tourists, young people, the elderly, and non-car owning households (as a proxy for the socially excluded).

3.5 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.

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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 set out in the SDF to be used as a checklist for the contents of RPG.

4.3 Separately recording both strategic objectives and policies (see worked example at [Figure 5](#)), has the added value that it enables the scoping exercise to reveal the degree of consistency within the strategy. This is another objective of scoping - see detailed advice on testing for consistency below. 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.

4.4 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

4.5 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.

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

Figure 5: Proposed Scoping Framework (.pdf file size 8kb)

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5 Appraisal Of The Spatial Strategy

Context

5.1 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.

5.2 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.

5.3 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

5.4 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).

5.5 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.

5.6 The sustainability appraisal can help the decision-makers generate options. The RPB team will want to achieve comprehensive coverage of the possibilities, so that the preferred options can be derived by a process of selection against sustainable development benchmarks. Subsequent iterative

refinements and modifications, as informed by the sustainability appraisal, can then be applied to an option that has been appraised within the group of alternative proposals.

5.7 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

5.8 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 6](#). 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.

5.9 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.

Relatively large potential impacts should be distinguished by an additional symbol, as should relatively small impacts, to help decision-makers in determining the best option.

Figure 6: Use of the framework to appraise a spatial development option (.pdf file size 24kb)

5.10 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, but over-sophisticated, time-consuming techniques should be avoided. Frequently the most effective approach would include taking the view of an expert group on the 'change of direction' and other potential impacts of a given option.

5.11 The ability to compare options is important in undertaking an appraisal, guiding the spatial strategy to the 'best' overall choice. The sustainability appraisal helps to inform decisions about

which option performs better than others against the sustainability criteria by revealing the potential impacts.

5.12 In [figure 7](#), 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.

5.13 The figure presents the performance of the options against the objectives taken from Annex 1 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.

Figure 7: Comparative appraisal of options (.pdf file size 17kb)

5.14 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 specifically measured; qualitative judgements also need to be made.

Using the findings

5.15 The comparative appraisal tables assist the task of decision making of the RPB by demonstrating how options perform 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.

5.16 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.

5.17 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 continued 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.

5.18 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. However, a matrix that identifies those impacts that have a relatively high positive or negative impact, and is accompanied by a commentary, will help decision-makers to determine the most sustainable option. The importance or weight to be given to an objective will vary for different policies, and is for those making the decisions and not for the appraisal team. It might be appropriate for instance to give greater weight to those objectives concerned with the longer term, as the concept of inter-generational equity is a very important one for sustainability.

5.19 Presentationally, the options can be placed in rank order according to their performance against the objectives. This will be a matter of judgement by those undertaking the appraisal, with an explanation given.

5.20 The differences between options can be judged by changes in the relative performance of the options. 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.

5.21 RPG now should include a regional transport strategy (PPG11 Chapter 6). At the heart of RPG is a spatial strategy which takes an integrated approach to land-use and transport and should be appraised as such. Were the spatial 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. The sustainability appraisal will, therefore, apply to the draft regional transport strategy as well as to the wider draft regional spatial strategy of which it is a part.

5.22 At the regional and sub-regional level only the strategic transport network would be in the option assessment. This has two advantages; the computational requirements of the exercise are minimised and the effects of changes in options are easier to assess.

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6 Appraisal Of Policies

Expression of policies

6.1 PPG11 expects specific and clear policies, supported by targets that can be quantified wherever practicable, and for those where this is not possible by appropriate indicators. This accords well with appraisal (see box on following page).

Appraisal of policies

6.2 The general principle for the appraisal of policies is for each policy to be examined against each sustainability objective and target. It is intended that an appraisal framework should be used (see [Figure 8](#)).

6.3 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 amend the policy in order to remove or reduce negatives.

6.4 There is also categorisation of likely performance against a target, expressed in terms of the ability of the policy as currently formulated to deliver sustainable development.

6.5 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 outputs cannot be determined. This too should be treated as a query (see box below). Such policies should be reformulated so that they can be measured through a suitable target or indicator.

6.6 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, how the policy has been changed so that it best meets the sustainable development objectives.

Appraising policies which set out criteria

6.7 These are policies which set out criteria, against which proposals for development are to be considered. An example might be the form of a major development, and locational criteria, for example, the need for access to public transport. However, criteria based policies are not a substitute for strategic decision making, for example on the numbers, scale and distribution of premium employment sites. A criteria based policy being used to avoid strategic decisions is likely to prove incapable of appraisal.

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; and
- the final sentence is open to local interpretation which would enable virtually every city and town to say 'not here'.

PPG11 (new draft) intends a clear and specific approach to policy statements in RPG. This would imply a policy statement along the following lines: *"The region's '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' (i.e. 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; and
- 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.

6.8 When such a policy is appropriate, it needs to be appraised. The criteria used are appraised against sustainability objectives. The criteria used should be explored against sustainability objectives, looking for conflicts and important omissions.

Figure 8: Example extracts from a policy appraisal framework (.pdf file size 26kb)

Cumulative impacts

6.9 Exploration of cumulative impacts is an essential part of sustainability appraisal. The appraisal of the initial, direct impacts, should be followed up by an appraisal of the consequential and secondary impacts. Cumulative impacts result from the combination of individual effects. They can occur in various ways: (a) physical-chemical interaction, for example, road and rail noise or atmospheric emissions; (b) nibbling loss, for example, gradual disturbance or loss of land and habitat; and (c) induced development. Each new action can induce further actions to occur; for example, development around new traffic junctions. The scale of development is an important consideration. The larger it is the greater will be the pressures for induced development.

6.10 At the RPG level two different examples that can be identified are:

- 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.

The appraisal of cumulative impacts should follow that used for options and policies, recording the potential negative, neutral and positive effects accompanied by a commentary; because potential impacts of combinations of policies, and induced effects need to be assessed against the sustainable development objectives, there is likely to be a greater amount of uncertainty about possible outcomes. This should be made clear in the commentary.

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 an objective (i.e. make performance worse), their cumulative effect needs to be explored, since in combination they may lead to the crossing of thresholds.

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

- does this iterative appraisal demonstrate that the priority given to objectives and their associated targets is in accord with the regional consensus 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 objectives? and
- how can these be overcome so that the sustainable development objectives can be met?

6.13 In appraising cumulative impacts as with the spatial strategy and policies, it is for the decision-makers to weight the objectives. This is necessary to help determine difficult choices. The sustainability appraisal opens up issues for scrutiny and, if necessary, debate.

6.14 This situation is one where additional illumination can be gained from addressing the issue of "who benefits?" (see Chapters 3 and 5). 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 supported by the decision makers?

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 appraisers. 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 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 key stages in the process, however, more formal reporting of findings will be required so that the appraisal will continue right through to the issuing final RPG. These stages are:

- (i)** comparative appraisal of strategic options, and policies prior to a choice being made;
- (ii)** an appraisal of the finally selected option and policies;

- (iii) appraisal of draft RPG prior to its submission to the Secretary of State;
- (iv) appraisal of Secretary of State's proposed changes to RPG if these are significantly different from the draft RPG; and
- (v) if significantly 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, may be different from that for the earlier stages following the transfer of the RPG process to the Secretary of State (see para 2.16).

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

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 and evaluation processes will flag up areas where the RPG is not performing to expectations, and may lead to a selective or wholesale review of the RPG.

8.2 Conceptually, the processes of appraisal, which is ex ante, and monitoring and evaluation which are post hoc, are quite distinct, and the methodologies adopted will reflect the different agendas and purposes.

Appraisal

8.3 A sustainability appraisal of RPG is essentially a process of assessing the probable future impacts of its various components and policies, and of the cumulative effects of the whole and elements of, the strategy, on a range of sustainability objectives and targets.

Monitoring and Evaluation

8.4 The monitoring process, ideally undertaken annually, should focus on actual strategy performance against the stated objectives and targets. Evaluation should be linked to the findings of the monitoring process, and will cover the need for a review of the RPG.

8.5 In addition to the targets, which can be directly measured, indicators will be needed as discussed before (see Chapter 2) to measure the performance of the strategy. Advice on these will be set out in guidance referred to in Section 2.

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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 complementary 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 9](#).

Figure 9: Mini and full sustainability appraisals (.pdf file size 9kb)

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 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 Baseline studies for RPG should 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. The DETR RPG research programme is helping to fund these projects. This is discussed in Chapter 10.

Application of the approach to other aspects of regional policy

9.7 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 facilitates effective policy review.

9.8 As such, it has the potential to form the basis for other appraisals at the regional level, including of reviews by RDAs of their regional economic strategies. 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. The regional sustainable development frameworks will help to provide these over-arching objectives.

9.9 Undoubtedly some of the policies will be hard to appraise because they are insufficiently specific. However, if appraisal of, for example, 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.

9.10 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. Appraisal can only draw attention to likely performance. Decision making rests elsewhere.

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10 Sustainable Development And Baseline Studies

Embedding sustainable development into RPG

10.1 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.

10.2 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 and sub-regional scale. Inadequate baseline data (poor quality or incomplete coverage at regional level) is a major constraint both to effective strategy making and to detailed appraisal. The Department has been addressing the need for good baseline information through its RPG research programs which funds appropriate projects.

10.3 Baseline studies need to provide information comparable across the region and be capable of disaggregation to an appropriate sub-regional scale. For particular topic areas (for example, housing land, biodiversity, economic activity, water quality, transport accessibility, mode) 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.

10.4 Desirable characteristics for regional baseline studies include the following:

- providing information about specific regional characteristics that does not overlap with national surveys;
- developing approaches which promote integrated thinking (i.e. combine social, economic and/or environmental aspects) building on information obtained about particular topic areas;
- 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.

10.5 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.

10.6 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.

10.7 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 capital of an area. Transport studies detail the nature and use of the various networks. As part of its contribution to facilitating the current round of RPG reviews, DETR has been funding wholly, or in part, a wide range of studies intended to provide basic information, for example, on housing sites, sustainable locations to accommodate growth.

10.8 Topic based baseline studies of this type are valuable and logical, and reflect the division of responsibilities within planning bodies and the structure of most planning policy documents. However, the aim should be an integrated approach to addressing issues of sustainable development, using the topic-based information as building blocks.

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

10.10 As an example of thinking differently, the box in [Figure 10](#) 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 10:

Using the four themes of sustainable development for base-line studies in a transport example (.pdf file size 7kb)

Annex 1

Setting objectives and targets where an SDF is not in place

Illustrative objectives and targets for use in the sustainability appraisal of RPG.

Sustainability Objectives	Targets and directions of change
Maintenance of high and stable levels of economic growth	
To encourage and accommodate the maintenance of a steady rate of economic growth	<ul style="list-style-type: none"> - achieve stable long run average growth (in regional GDP) of x% pa - achieve stable employment growth (y% pa)
To provide for good accessibility to and movement of goods by businesses within the region	<ul style="list-style-type: none"> - all new sites for industry and commerce to be within x00m of a satisfactory public transport service - x% of new office floor-space to be within town or city centres - all new sites for manufacturing and distribution to be within x km of a freight interchange facility - reduce lost time to x% of total travel time by 20??
To encourage and accommodate the expansion of selected economic sectors involved with advanced manufacturing and exports	<ul style="list-style-type: none"> - achieve a continued supply of strategic sites for advanced manufacturing and export services in [broad location to be referred to in RPG]
To encourage stronger linkages between firms and the development of clusters and specialisms within an area	<ul style="list-style-type: none"> - achieve a continued supply of suitably located sites to facilitate the emergence of clusters
To build economic activity on local strengths	<ul style="list-style-type: none"> - achieve an adequate supply of available employment sites local to all areas, including small settlements
Social progress which recognises the needs of everyone	
To find a balance in the distribution of population, employment and housing	<ul style="list-style-type: none"> - match housing provision to employment growth at the sub-regional level - increase the accessibility to housing for household needs arising within communities and for economic migrants
To reduce disparities in income, and access to jobs, housing, and services between areas within the region and between segments of the population	<ul style="list-style-type: none"> - implement regeneration programmes in all areas in the top quartile for the region for relative multiple deprivation by 2016 - reduce unemployment in defined

	priority areas to x% of the national average by 20??
To ensure good accessibility to jobs, facilities and services	<ul style="list-style-type: none"> - x% of population to be within x00m of a satisfactory public transport service by 20?? - y% of population to be within x00m of a primary school by 20?? - z% of population to be within xkm of a hospital providing A & E services by 20??
To provide decent housing for every household requiring a home	<ul style="list-style-type: none"> - match of housing provision to assessed need - x% change in mix of house types
Effective protection of the environment	
To maintain and enhance the quality and distinctiveness of the landscape	<ul style="list-style-type: none"> - reduce the loss of countryside valued for its intrinsic quality - reinstate and increase strategic landscape features - halt the loss or fragmentation of 'tranquil areas'
To make towns and cities more attractive places to live	<ul style="list-style-type: none"> - maintain and improve quantity and distribution of open space with an amenity value (no net loss) - reduce the number of households affected by ambient noise above n dBA by xx% per 5 year period - reduce volume of traffic by yy% per 5 year period
To maintain and increase biodiversity	<ul style="list-style-type: none"> - halt damage to internationally and nationally and designated sites - meet regional Biodiversity Action Plan targets for species x, y and z by 20?? - add to the stock of wildlife habitats at every level from regional to community
To maintain and improve the quality of ground, river and sea waters	<ul style="list-style-type: none"> - reduce length of non-compliant river stretches by xx% by 20?? - increase proportion of bathing beaches meeting the mandatory coliform standard to yy% by 20?? - reduce incidents of groundwater pollution to n per year by 20??
To improve atmospheric integrity and air quality	<ul style="list-style-type: none"> - achieve air quality targets in full (CO2, particulates etc) - achieve shift to x% of trip/km by walking, y% by cycling and z% by

	<ul style="list-style-type: none"> public transport by 20?? - reduce vehicle based distance travelled by xx% per 5 year period - increase proportion of freight movement by rail starting and/or finishing in the region by y % per 5 year period - increase woodland cover to w% by 2016
Prudent use of natural resources	
To reduce consumption of undeveloped land	<ul style="list-style-type: none"> - reduce amount of greenfield land outside settlements built on per 1000 additional households to xx% of the 1998 figure by 20?? - increase average residential densities in all new developments to a regional average of xx by 20?? - increase provision of additional dwellings through conversion and reuse of existing building stock to cc % by 2016 - reduce annual loss of flood storage to nil by 20??
To use agricultural land more sustainably	<ul style="list-style-type: none"> - halt loss of following semi-natural habitats to agricultural intensification by 2006 - aa wetlands - bb downlands - cc uplands
To promote a move up through the waste management hierarchy	<ul style="list-style-type: none"> - achieve a reduction in commercial waste for disposal of cc % of 1998 level by 20?? - reduce amount of domestic waste disposed of by landfill by dd % from 1998 level by 20?? - recover rr kw of energy from waste by 2016
To reduce consumption of minerals from primary sources	<ul style="list-style-type: none"> - reduce extraction of sand and gravel by xx% per 5 year period - reduce extraction of crushed rock by yy% per 5 year period - reduce extraction of building stone by zz% per 5 year period - increase contribution of recycled and secondary aggregates to aa% of total consumption by 20??
To ensure that water is efficiently used to meet needs whilst reducing environmental impact and resource depletion	<ul style="list-style-type: none"> - 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)