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1 Introduction

1.1 This document

1.1.1 This document provides advice for local planning authorities (LPAs) on undertaking sustainability appraisal (SA) for development plan documents (DPDs) and builds on the guidance contained in the Plan Making Manual produced by the Department for Communities and Local Government (available at: www.pas.gov.uk/planmakingmanual). The advice can also inform the appraisal of supplementary planning documents (SPDs) which may, on occasion, require SA.

1.1.2 SA is central to the preparation of DPDs and underpins the generation and testing of options – see Figure 1. Planning Policy Statement 12: Local Spatial Planning (PPS12) emphasises that the SA should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process.

1.1.3 When examining DPDs, the Planning Inspectorate will ask a series of key questions, including:

- has the DPD been subject to SA?
- Has the LPA provided a final report of the findings of the appraisal?
- Does the SA show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?
- Is it clear how the significant effects identified in the SA report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?

1.1.4 The SA process is underpinned by the requirements of the EU Strategic Environmental Assessment Directive which applies to all DPDs (and possibly some SPDs).

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1 The Plan-Making Manual provides guidance on the applicability of SA to SPDs
2 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’)
Figure 1: Key components of DPD preparation
1.1.5 This advice note focuses, firstly, on meeting the requirements of the SEA Directive. This is followed by a set of principles for undertaking a robust SA which adds value to the plan-making process. Practical advice is then provided on undertaking each of the key stages in the SA process:

- scoping and evidence base
- appraisal
- reporting
- consultation;
- decision-making
- monitoring.

1.1.6 The note also includes advice on resourcing. Case studies are used throughout the guidance to illustrate key points. A list of further information sources can be found in the final section.

1.1.7 This advice note focuses primarily on applying SA to core strategies; however, the advice is also relevant to the SA of other DPDs (area action plans, site allocations etc.) and SPDs (where SA applies).
2 Meeting the requirements of the SEA Directive

“Sustainability appraisal fully incorporates the requirements of the European Directive on Strategic Environmental Assessment. Provided the sustainability appraisal is carried out following the guidelines in the A Practical Guide to the Strategic Environmental Assessment Directive and the Plan-Making Manual there will be no need to carry out a separate SEA.”


“the sustainability appraisal covers wider social and economic effects of plans, as well as the more environmentally-focused considerations in the Directive.”

The Plan Making Manual

2.1 Introduction

2.1.1 The SA process is underpinned by the requirements of the EU Strategic Environmental Assessment Directive\(^3\) - the ‘SEA Directive’. Where reference is made to SA or the SA report in this note, it denotes SA required by legislation and incorporating the requirements of the SEA Directive.

2.1.2 The SEA Directive is implemented in England through the ‘Environmental Assessment of Plans and Programmes Regulations 2004’. The Directive is procedural in nature and sets out a series of steps that must be undertaken as part of an assessment. Under the Directive, an ‘environmental report’\(^4\) must be prepared which, in the case of DPDs, is incorporated within the SA report which accompanies the draft plan at publication.

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\(^3\) Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’)

\(^4\) Note under the Directive the ‘environmental report’ does not have to be a discrete document; the Directive states that ‘environmental report’ shall mean the part of the plan or programme documentation containing the information required in Article 5 and Annex I.
2.2 SEA Directive requirements

2.2.1 The SEA Directive’s requirements are relatively straightforward and reflect a common sense approach to plan-making. In essence, the Directive requires a series of questions to be answered – see Table 1. These questions provide the structure for the chapters that follow.

2.2.2 In addition, the Directive requires the appraisal to focus on ‘reasonable alternatives’: the LPA should ensure that “the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated” (Article 5(1)). The rationale for each option should also be clearly recorded; the environmental report must include “an outline of the reasons for selecting the alternatives dealt with” (Annex I(h)).

2.2.3 The Plan-Making Manual includes guidance on options. PAS has also prepared a separate advice note on options generation and appraisal for LDFs which is available at www.pas.gov.uk/options.
Table 1: SEA Directive requirements

<table>
<thead>
<tr>
<th>Key questions</th>
<th>Corresponding requirement of the SEA Directive (the ‘environmental report’ must include…)</th>
</tr>
</thead>
<tbody>
<tr>
<td>What is the plan trying to achieve?</td>
<td>“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes” (Annex I(a))</td>
</tr>
<tr>
<td>What’s the policy context?</td>
<td>“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes” (Annex I(a))</td>
</tr>
<tr>
<td>What are the key sustainability objectives that need to be considered?</td>
<td>“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I(e))</td>
</tr>
<tr>
<td>What’s the situation now?</td>
<td>“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” (Annex I(b))</td>
</tr>
<tr>
<td></td>
<td>“the environmental characteristics of areas likely to be significantly affected” (Annex I(c))</td>
</tr>
<tr>
<td>What will the situation be without the plan?</td>
<td>“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” (Annex I(b))</td>
</tr>
<tr>
<td>What are the key issues including any sustainability problems?</td>
<td>“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [Special Protection Areas under the Birds Directive] and 92/43/EEC [Special Areas of Conservation under the Habitats Directive]” (Note impacts on European sites will be specifically</td>
</tr>
<tr>
<td>Key questions</td>
<td>Corresponding requirement of the SEA Directive (the ‘environmental report’ must include...)</td>
</tr>
<tr>
<td>---------------</td>
<td>-------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>What will be the situation with the plan?</td>
<td>“the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors” (Annex I(f))</td>
</tr>
<tr>
<td>(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.</td>
<td></td>
</tr>
<tr>
<td>How can we mitigate adverse (and enhance positive) effects?</td>
<td>“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme” (Annex I(g))</td>
</tr>
<tr>
<td>How can we best monitor the plan’s impacts?</td>
<td>“a description of the measures envisaged concerning monitoring...” (Annex I(i))</td>
</tr>
</tbody>
</table>
3 Principles for undertaking a robust SA

3.1 Introduction

3.1.1 This section sets out the key principles for undertaking a robust SA which adds value to the plan-making process. These principles are summarised below and introduced in turn in the sections that follow.

- SA should form an integral part of the plan preparation process
- The plan and the SA should, where possible, share a common evidence base
- SA is most useful when applied to alternatives
- Other assessment processes should feed into the SA process where appropriate (with the exception of Habitats Regulations Assessment)
- The SA report should document the ‘story’ behind the plan’s preparation
- The significant effects identified through the SA should be monitored through the annual monitoring report

3.2 An integrated approach

“The sustainability appraisal is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process”

The Plan Making Manual

3.2.1 In practice, this involves undertaking appraisal at key junctures in the plan-making process; for example, during the early preparation of the plan, publication and pre-submission. Sufficient time should be factored into the plan preparation process to allow for a comprehensive appraisal and for any recommendations arising from the SA to be considered and reflected in the emerging plan as appropriate.
3.3 A common evidence base

“Evidence gathering is the first stage in preparing a development plan document... Where possible, you should develop the sustainability appraisal using the existing local development framework evidence base.”

The Plan Making Manual

3.3.1 As part of the SA process an evidence base should be established in order to inform the appraisal of options and the emerging plan. At present, LPAs typically establish a dedicated evidence base for the SA and document this in a scoping report. However, the scope of the evidence required to develop the plan and undertake the SA is very similar and the plan and SA evidence bases can, in practice, be effectively brought together.

3.4 Focused on alternatives

“The sustainability appraisal should inform the decision making process to facilitate the evaluation of alternatives. It should also help demonstrate that the plan is the most appropriate given the reasonable alternatives.”

The Plan Making Manual

“At examination, LPAs will need to show a clear trail of options generation, appraisal, selection or rejection and the role that Sustainability Appraisal (SA) and community engagement have played in this process.”

3.4.1 SA is most useful when looking at options when the sustainability implications of different choices can be explored and the findings of the SA can influence the choice of alternative(s). The assessment of ‘reasonable alternatives’ is also a legal requirement under the ‘SEA Directive’.

3.5 Integrating other assessments

“Where authorities are required by law or encouraged by government policy to undertake assessments of their plans, such assessments should feed into and be summarised in the sustainability appraisal.”


3.5.1 In some cases, LPAs may consider undertaking assessments other than SA as part of plan development, including Equality Impact Assessment (EqIA), Health Impact Assessment (HIA) and rural proofing. To avoid duplication of effort it makes sense to integrate other assessment procedures with the SA; however, LPAs should ensure that all legal requirements are met.

3.5.2 Habitats Regulations Assessment (HRA) is somewhat different from SA in terms of procedure; for this reason, it may be appropriate to maintain a degree of separation between the SA and HRA. However, there is scope for linking the two processes; for example, the HRA screening report can be published alongside or as part of the SA scoping report.
3.6 Telling the story

“Sustainability Appraisal is where the consideration and assessment of the main alternatives should be found.”

The Planning Inspectorate (2009). Examining Development Plan Documents: Learning from Experience

3.6.1 The SA documentation should tell the story of how the plan developed over time: i.e. the options that were generated; the process through which these were appraised, consulted on and refined; and the rationale for the preferred option.

3.7 Monitoring significant effects

“The linkages between the AMR and SA are, at best, patchy. In several cases SA and AMR processes are treated as two distinct remits that do not yet overlap with each other. Most authorities, however, recognise the need for greater integration, including selecting indicators which enable a causal link to be established between implementation of the LDF and the ‘significant effects’ being monitored”

Communities and Local Government (2007). Using evidence in spatial planning

3.7.1 In identifying and evaluating the impacts of a DPD through the SA process, LPAs may identify ‘significant effects’. The Plan-Making Manual states that those undertaking the appraisal should “propose measures to monitor the significant effects of implementing the development plan document”. For example, there may be concerns that a new urban extension will give rise to effects on water resources that cannot be measured using the existing indicators in the annual monitoring report (AMR). With this in mind, an LPA might develop a bespoke indicator to monitor the issue. Monitoring significant effects should enable a comparison to be made between the effects predicted in the SA and the actual effects measured during policy implementation.
4 Scoping and evidence base

“Evidence gathering is the first stage in preparing a development plan document... Where possible, you should develop the sustainability appraisal should using the existing local development framework evidence base.”

The Plan Making Manual

4.1 Introduction

4.1.1 The first stage in the SA process involves establishing the scope of the SA, i.e. the issues it will concentrate on. This has clear parallels with the plan-making process where the aim is to identify the key issues for the area and focus the plan on addressing these. In order to identify the issues for both the plan and the SA it is necessary to first establish an evidence base. This section sets out a process through which the evidence base can be assembled and the issues for the plan and the SA identified.

4.1.2 At present, LPAs typically establish a dedicated evidence base for the SA and document this in a scoping report for consultation with the SEA consultation bodies (English Heritage, the Environment Agency and Natural England), other stakeholders and the public. However, the scope of the evidence required to develop the plan and undertake the SA is very similar and the plan and SA evidence bases can, in practice, be effectively brought together.

4.1.3 PAS has prepared a separate advice note on the evidence base for LDFs which is available at www.pas.gov.uk/evidence. This emphasises that the evidence base should include a review of the policy context in which the plan is being prepared and information on the current and future state of the area. The guidance suggests that the SA scoping report provides a useful opportunity to summarise the messages emerging from the evidence base – including the key issues for the area - and canvass stakeholder views on these.

4.1.4 This section sets out the process through which the evidence base can be assembled and the key issues for the plan and the SA identified.
4.2  What is the plan trying to achieve?

The environmental report should include “an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes”

SEA Directive (Annex I(a))

4.2.1 To demonstrate compliance with the SEA Directive, the SA report, which accompanies the draft plan at publication, should include an outline of the plan’s content including its strategic objectives. However, in the early stages of the plan-making and SA processes, it is helpful to take a step back and ask what the plan is trying to achieve. In coming to a decision on this, LPAs should consider what the plan will be able to do and what it won’t be able to do. For example, an option to tighten the building regulations would not be within an LPA’s power to deliver. Deciding early on what the plan is trying to achieve will assist with scoping and evidence gathering.

4.3  Starting out

4.3.1 In order to focus evidence gathering in the early stages, it is helpful to identify an initial range of topics for which evidence might be assembled. This is the first stage in the scoping process and it is important that LPAs identify topics that are relevant given the nature of the plan and the context in which it is being prepared.

4.3.2 Table 2 provides a list of topics which could provide a useful starting point for evidence gathering: these encompass the key issues generally addressed by spatial plans and associated appraisals. In addition, LPAs could also consider identifying spatial areas within their district or borough for which they might want to assemble evidence. These could be based on functional areas (e.g. housing market areas).
4.3.3 Preparing a scoping report based on topics and spatial areas can help facilitate stakeholder engagement; for example, Natural England might focus their attention on the ‘biodiversity and green infrastructure’ and ‘landscape’ sections while a parish council might focus on the evidence and issues for a particular spatial area.

**Table 2: Topics for which evidence could be initially gathered**

<table>
<thead>
<tr>
<th>Topic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air quality</td>
</tr>
<tr>
<td>Biodiversity and green infrastructure</td>
</tr>
<tr>
<td>Climate change adaptation and flood risk</td>
</tr>
<tr>
<td>Climate change mitigation and energy</td>
</tr>
<tr>
<td>Community and wellbeing (including equalities and health)</td>
</tr>
<tr>
<td>Economy and employment</td>
</tr>
<tr>
<td>Historic environment</td>
</tr>
<tr>
<td>Housing</td>
</tr>
<tr>
<td>Land (including agricultural land, brownfield land and contaminated land)</td>
</tr>
<tr>
<td>Landscape</td>
</tr>
<tr>
<td>Rural areas</td>
</tr>
<tr>
<td>Transport</td>
</tr>
<tr>
<td>Waste</td>
</tr>
<tr>
<td>Water</td>
</tr>
</tbody>
</table>

4.3.4 In practice, some of the assembled evidence will cut across more than one topic and linkages will need to be identified. For example, some communities may be disproportionately affected by the impacts of climate change (e.g. as a result of their exposure to flood risk or the condition of their housing) and this might need to be reflected in the evidence base for both flood risk and community and wellbeing.
4.4 What’s the policy context?

The environmental report should include “an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes”

SEA Directive (Annex I(a))

The environmental report should include “the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme”

SEA Directive (Annex I(e))

“Local authorities should take account of relevant policies, plans, programmes and sustainability objectives of neighbouring authorities, and of Scotland and Wales where relevant.”

The Plan Making Manual

4.4.1 Under the SEA Directive, the relationship between the DPD and other relevant plans and programmes must be taken into account. In addition, any environmental protection objectives relevant to the plan must also be taken into account (see below). In practice, this involves undertaking a detailed analysis of the policy context in which the DPD is being prepared. LPAs should therefore review the policies, plans, programmes, strategies and initiatives (PPPSIs) relevant to the content of the DPD. This review should assist the LPA in identifying its obligations and will also highlight the objectives of other organisations and service providers which might be reflected in the DPD. These could include, for example, objectives relating to health, the local economy or biodiversity. Taking account of these objectives in formulating and delivering DPDs is at the heart of spatial planning.
“[Policy] Integration is achieved when the matters of concern to one organisation are taken into account in the work of another. In terms of the LDF, this means a DPD which has the relevant objectives of other strategies embedded within it”

Communities and Local Government (2008). Spatial Plans in Practice: Supporting the reform of local planning

“Whilst other plans may be referred to in the sustainability appraisals, there needs to be clearer evidence that the strategies, plans and programmes of other infrastructure and service providers, that may impact upon land use, have been fully encompassed within the plan itself”

core strategy DPD Inspector’s Report

4.4.2 The Sustainable Community Strategy (SCS) will form a crucial part of the review. The SCS should set out a long-term vision for the area to tackle local needs. The outcomes and targets in the local area agreement (LAA) – a key mechanism for delivering the vision in the SCS – should also be identified and taken into account.

4.4.3 Other relevant PPPSIs identified in the Plan Making Manual include:

- spatial plans – such as national policy statements, planning policy statements, regional strategies, and other local development framework documents, including minerals and waste plans
- plans dealing with the physical environment – such as river basin management plans, strategic floor risk assessments, shoreline management plans
- plans or programmes dealing with specific sectors or activities – such as economic assessments, local transport plans and waste management plans
4.4.4 The review could be undertaken in several ways. Table 3 provides an example from the London Borough of Havering where PPPSIs were reviewed on an individual basis. Importantly, the implications for both the SA and the DPDs were drawn out. Alternatively, the review could be undertaken on a topic-by-topic basis – see Table 4 for an example. Whatever the approach, the aim should be to distil the key messages for the DPD and reflect these in the plan as appropriate. Box 1 highlights some tips for undertaking the policy context review.
Case study: Havering

Table 3: Policy context review for Havering core strategy and Development Control Policies DPD SA (extract)

<table>
<thead>
<tr>
<th>Planning Policy Guidance Note 3: Housing</th>
<th>Implications for SA</th>
<th>core strategy Response/SSA Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Key aims, relevant objectives or targets / indicators</strong></td>
<td><strong>Implications for SA</strong></td>
<td><strong>core strategy Response/SSA Response</strong></td>
</tr>
<tr>
<td>Aims to ensure local authorities:</td>
<td>Need indicators to measure density, use of brownfield land, supply of affordable housing and quality of housing design</td>
<td>Undertake housing capacity study</td>
</tr>
<tr>
<td>• meet the housing requirements of the whole community, including affordable and special needs housing</td>
<td></td>
<td>Prioritise development of brownfield land, relate densities to public transport accessibility, undertake housing needs requirement study to inform what type of housing is required to meet needs of different households throughout the plan period.</td>
</tr>
<tr>
<td>• provide wider housing opportunity and choice and create mixed communities</td>
<td></td>
<td>In growth areas of London Riverside and Romford Town Centre ensure sustainable communities are achieved.</td>
</tr>
<tr>
<td>• provide sufficient housing land but give priority to re-using previously-developed land within urban areas</td>
<td></td>
<td>Secure high quality design led development through urban design policies</td>
</tr>
<tr>
<td>• create more sustainable patterns of development prioritise the needs of people in designing the layout of residential developments</td>
<td></td>
<td>Allocate 5 year supply of housing land</td>
</tr>
<tr>
<td>• seek to reduce car dependence</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• promote well designed housing developments that contribute to urban renaissance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Provide 60% of additional housing on previously developed land</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Increase housing densities where there are good public transport links</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Encourage housing densities of between 30-50 dwellings per hectare</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 4: Reviewing the policy context

**Topic: water**

**PPPSIs reviewed:**
- River Basin Management Plan
- Regional water resources strategy
- Regional spatial strategy (RSS)
- Relevant catchment abstraction management strategy
- Code for Sustainable Homes

**Key messages for the core strategy and SA:**

- The relevant River Basin Management Plan emphasises that local government has a major role in implementing the plan. Example actions include promoting sustainable water management best practice through pre-application discussions with developers and implementing surface water management plans, so increasing resilience to surface water flooding.

- The regional water resources strategy proposes demand management – water efficiency to meet the growing demand for water in the region – with implications for new development in the borough, particularly the need for water efficiency measures.

- The RSS now sets a per capita per day consumption target for water – with implications for new development in the borough, particularly the need for water efficiency measures.

- The catchment abstraction management strategy indicates that the current resource availability is either ‘no water available’, ‘over-licensed’ or ‘over-abstracted’ – with implications for new development in the borough, particularly the need for water efficiency measures.

- The Code for Sustainable Homes sets minimum standards for water efficiency (and energy use) at each code level (the rating ranges from level 1 to level 6, where level 6 is the highest). The aim is to reduce the consumption of potable water in the home from all sources, including borehole well water, through the use of water efficient fittings, appliances and water recycling systems.
• The continued good quality of rivers depends to a considerable extent on the adequacy of sewage treatment works, particularly those that serve urban areas – with implications for the level of infrastructure to accompany new development in the borough

• Household water use will increase as the summers get hotter under future climate change – with implications for new development in the borough, particularly the need for water efficiency measures

Conclusions

All the water-related policies, plans etc. reviewed emphasise the need to promote demand management and strongly imply the need for all new development in the borough to incorporate effective water efficiency measures. This message must be clearly reflected in the core strategy (and the development management policies DPD). The review also indicates that in order to maintain river water quality, adequate sewage treatment facilities must accompany new development and ‘infrastructure lag’ must be avoided – this could also be reflected in core strategy policies and the council should engage the Environment Agency in discussions over wastewater infrastructure early on in the plan-making process.
Box 1: Tips for undertaking the policy context review

- Only review PPPSIs that are relevant to the DPD
- Identify sustainability objectives contained within relevant PPPSIs and clearly highlight these (see below)
- Avoid including international and national PPPSIs where the requirements of these are translated by regional and local documents included in the review
- Ensure that the PPPSIs reviewed are the most up-to-date versions
- Identify opportunities for cooperation with other LPAs in your area since the implications of one PPPSI will frequently apply to DPDs prepared by neighbouring authorities
- Bear in mind that the statutory consultees will want to see PPPSIs relevant to their areas of interest included in the review. For example, Natural England may wish to see biodiversity action plans referred to
- Distil the key messages from the context review including the sustainability objectives identified and use these as a checklist when preparing the plan to ensure that it takes into account everything that it needs to
4.5 What are the key sustainability objectives that need to be considered?

The environmental report should include “the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme”

SEA Directive (Annex I(e))

4.5.1 In developing the evidence base, LPAs should identify the sustainability objectives relevant to the DPD. The Plan Making Manual emphasises that these may be laid down in Government or local authority policies. They may also be legal obligations or international commitments (for example the obligation for a local authority to protect a particular habitat for biodiversity reasons).

4.5.2 Sustainability objectives can generally be identified through the review of the policy context – see above. Particularly useful sources of objectives will include:

- the UK Sustainable Development Strategy
- the regional sustainable development framework
- the sustainable community strategy.
4.6 What’s the situation now?

The environmental report should include;

“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”

SEA Directive (Annex I(b))

“the environmental characteristics of areas likely to be significantly affected”

SEA Directive (Annex I(c))

“Many authorities have submitted SAs containing a mass of material that does not obviously contribute to the content of the plan. Our impression is that often far more rigorous thought needs to be given at the outset to what sort of sustainability evidence is needed.”

The Planning Inspectorate (2009). Examining Development Plan Documents: Learning from Experience

4.6.1 Planning officers should consider what evidence is needed in order to identify issues for the plan and the SA; generate and appraise options; and inform policy development. The nature of the evidence needed will vary from plan to plan. For example, in developing core strategies, LPAs will need to develop a comprehensive understanding of their district or borough (this may be more focused for minerals and waste DPDs). In contrast, for an AAP, it will be necessary to develop a thorough understanding of the action plan area including its relationships with neighbouring areas. PAS has prepared a separate advice note on the evidence base for LDFs which is available at www.pas.gov.uk/evidence.
4.6.2 Importantly, PPS12 emphasises that the evidence gathered should be proportionate to the job being undertaken by the plan, relevant to the place in question and as up-to-date as practical having regard to what may have changed since the evidence was collected.

4.6.3 In relation to SA, the effects of the options and the emerging plan policies must be appraised in relation to the baseline situation. The Plan Making Manual defines the ‘baseline’ as the main characteristics of the current situation and important trends in the area of the plan.

4.6.4 In order to establish the baseline situation, LPAs can draw on a combination of available statistics, topic-based studies (e.g. strategic housing land availability assessment, strategic flood risk assessment) and area profiles. The latter provide the opportunity to synthesise the evidence emerging from different topic-based studies on a spatial basis and develop an intimate understanding of different areas within the district or borough and the issues they face. This information could be potentially helpful in establishing the evidence base for site allocations DPDs and AAPs. The information from area profiles will assist in establishing “the environmental characteristics of areas likely to be significantly affected” as required by the SEA Directive.
Case study: Wirral

4.6.5 Wirral Metropolitan Borough Council prepared a series of ‘area profiles’ as part of its LDF evidence base. The council divided Wirral into eight broad settlement areas based on the main groups of settlements within the borough (see Figure 2) and profiled each of these. The information for each settlement area is organised around a series of headings (e.g. socio-economic background, housing, local heritage, town centres, employment) and key issues are identified for each area (see Box 2 for an example).

Figure 2: broad settlement areas in Wirral

Box 2: key issues identified for Settlement Area 1 in Wirral

- Securing the continued regeneration of New Brighton
- Addressing the decline of Liscard Town Centre
- Safeguarding employment uses at Cross Lane Industrial Estate
- Addressing the social, economic and environmental needs of Seacombe and Liscard
- Maintaining the attraction of coastal facilities and recreation
- Promoting a more sustainable pattern of journeys to work
- Providing for the concentration of younger age groups in Seacombe
Case study: South Derbyshire

4.6.6 South Derbyshire District Council also prepared a series of 11 area profiles setting out a wide range of information for each area, for example, on health, crime, safety, flood risk, deprivation, household composition, SHLAA sites, affordable housing, employment, services, landscape and educational attainment. The council also prepared a series of thematic topic papers which set out the technical background to the core strategy. These papers are ‘living’ drafts and will be subject to continuous update as and when new information or evidence becomes available. Topic papers have been prepared for: housing; economy; retail and leisure; transport; social and green infrastructure; climate change and renewable energy; water and flooding; built environment; and spatial vision and strategy.
Case study: Sunderland

4.6.7 Sunderland City Council also prepared a series of topic papers and sub-area papers. Topic papers covered issues including climate change; community facilities; economy; green space; housing; previously developed land; strategic sites; and utilities and infrastructure. Sub-area papers were prepared for the Coalfield; Washington; Sunderland North; and Sunderland South. Each paper concludes with a proposed ‘local vision’ and a set of strategic objectives for the sub-area.

4.6.8 As a starting point for establishing the baseline, LPAs could organise the collection of information around the topics identified in Table 2; note, however, that this is an indicative rather than a definitive list. For example, having established the policy context in relation to flood risk, LPAs could draw on information from the Environment Agency or a strategic flood risk assessment to establish the baseline situation in the district or borough and begin to determine whether or not flood risk should be a key issue for the plan and the SA to address (i.e. whether it is scoped in or out).

4.6.9 Box 3 highlights some tips for establishing the baseline.
**Box 3: Tips for establishing the baseline**

- Prepare topic papers and area profiles as a means to document the baseline situation and use these as the basis for the SA scoping report.

- Use the topic papers and area profiles as a means to synthesise the messages coming out of the various evidence base studies (SHLAA, SHMA, SFRA etc.).

- When collecting baseline information ask whether or not the information will be important in terms of generating and testing options (the ‘so what’ test); information that isn’t helpful in developing and appraising alternatives could potentially be excluded.

- Don’t focus solely on collecting district- or borough-wide indicator data that is not spatially disaggregated; for example, while the proportion of household waste that is recycled across the district or borough might provide useful context, it is unlikely to be pivotal in terms of generating and testing options.

- Ensure that the level of evidence collected reflects the level of detail in the plan; for example, if the DPD is set to contain certain strategic sites, then information on the characteristics of these sites and their relationships with neighbouring areas will be necessary to facilitate a robust appraisal.

- Map data using GIS where appropriate (e.g. for landscape and wildlife designations, flood risk, deprivation); consider preparing overlay maps showing constraints and / or opportunities.
4.7 What will the situation be without the plan?

The environmental report should include “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”

SEA Directive (Annex I(b))

4.7.1 Under the SEA Directive, the implications of the ‘business-as-usual’ scenario for the area must be established. Establishing the business-as-usual scenario involves asking how current policies, practices and trends might change in the future in the absence of any active intervention through the DPD. For example, will a strengthened retail offering in neighbouring growth areas encourage more people to shop outside the district with implications for existing retail centres? Will demographic trends (e.g. an ageing population) lead to changes in the way in which services are delivered? Are there any major transport infrastructure proposals in the offing which may influence future travel patterns in the district? Has the LPA put policies in place which may bear fruit during the plan period (e.g. housing renewal or retrofitting schemes?). Are there any new Government interventions on the horizon which may affect the district? Developing a good understanding of how the area might change without the plan will assist the LPA in ‘future proofing’ options and in justifying the interventions ultimately set out in the plan.

4.7.2 The description of the business-as-usual scenario should roughly cover the lifetime of the plan (for example, up to 2026) and the effects of any anticipated interventions (for example, changes in Government policy) should be factored in where possible. Assuming that an adopted core strategy is in place, the ‘business-as-usual’ scenario for daughter DPDs would partly involve prospective developments being evaluated in relation to core strategy policies rather than the more detailed guidance in the daughter DPD (and any risks this might entail).
4.8 What are the key issues including any sustainability problems?

The environmental report should include “any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [Special Protection Areas under the Birds Directive] and 92/43/EEC [Special Areas of Conservation under the Habitats Directive]”

SEA Directive (Annex I(d))

“The starting point for core strategies should be the identification of the critical issues that the council and its delivery partners are seeking to address”

The Planning Inspectorate (2009). Examining Development Plan Documents: Learning from Experience

“Plan making begins with the identification of issues. Evidence identifies issues and the issues determine the need for more evidence.”

Communities and Local Government (2008). Spatial Plans in Practice: Supporting the reform of local planning

“Sustainability issues can be any problems or uncertainties which need to be understood and addressed before the plan can be confidently considered sustainable. They include environmental problems, which must be identified under the SEA Directive. However, they could also be social or economic.”

The Plan Making Manual
4.8.1 It is important to synthesise the various components of the evidence base and draw out the key issues for the area. In particular, LPAs should clearly identify any ‘existing environmental problems’ facing the area in order to demonstrate compliance with the SEA Directive.

4.8.2 The issues and problems identified can then provide the ‘issues’ in any ‘issues and options’ paper as well as the key issues to be addressed through the SA. This stage will inevitably involve scoping out any issues not considered significant; the rationale behind any decision to scope out issues should be carefully recorded.

4.8.3 According to the Plan Making Manual, sustainability issues do not need to be precisely defined, but they can include matters which give rise to concern or controversy. The Plan Making Manual also emphasises that where possible, identified issues need to be linked to evidence by reference to baseline information and the identification of historical, or likely, future trends (i.e. the situation now and the situation without the plan – see above).

Case study: Cheltenham

4.8.4 Table 5 provides an extract of the key sustainability issues identified by Cheltenham Borough Council and included in their core strategy scoping report. The table helpfully includes evidence to support identification of the issue as well as possible sustainability consequences.
### Table 5: Key sustainability issues for Cheltenham (extract)

<table>
<thead>
<tr>
<th>Key sustainability issues</th>
<th>Evidence and trends</th>
<th>Sustainability Consequences</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Conservation Areas and Listed Buildings</strong> – significant conservation area coverage and high numbers of listed buildings</td>
<td>% of land designated as conservation area has remained static since 01/02. Most areas have character appraisals but only 16.5% have management proposals. Cheltenham has a high number of listed buildings.</td>
<td>Without management proposals it is difficult to manage and develop areas in a sustainable way. Listed buildings have management issues, particularly in terms of ensuring they are resilient to climate change and remain habitable environments.</td>
</tr>
<tr>
<td><strong>Habitats</strong> – small number of designated sites and very low area of SSSI’s in favourable condition, decreasing numbers of trees on council owned land</td>
<td>Cheltenham has only one designated local nature reserve, covering 0.8ha, with six additional sites that were proposed several years ago, which would increase area to over 44 ha, but still significantly below national average. Only 20% of SSSI land is favourable or recovering, well below the 95% target for 2010. Tree numbers overall and the number of new/replacement trees on council-owned land have been decreasing steadily.</td>
<td>The condition and lack of designated sites could have a major impact on the biodiversity and sustainability of wildlife habitats. Trees are important for absorbing CO2 and therefore combating climate change. They also have a cooling effect and provide areas of shade. Choice of species for replacing trees will be an important factor in ensuring they are resilient to climate change.</td>
</tr>
<tr>
<td><strong>Land designated as AONB or Green Belt</strong> – plays an important role in protecting the unique setting and landscape character of Cheltenham</td>
<td>Almost a third of the borough is covered by AONB status, forming part of the Cotswolds AONB, which is the largest AONB in the UK and almost a fifth of the borough is covered by the green belt separating Cheltenham, Gloucester and Bishops Cleeve.</td>
<td>The area of AONB and green belt within Cheltenham Borough is important for protecting the unique setting and landscape character of Cheltenham. It also provides sites for wildlife and recreational opportunities. Loss of this land could adversely affect the character of Cheltenham, impact on biodiversity and affect the quality of life of local people.</td>
</tr>
<tr>
<td><strong>River quality</strong> – very poor biological and reducing chemical river qualities</td>
<td>Biological quality of river is very poor and chemical quality dropped significantly in 2005.</td>
<td>Much of the river Chelt is culverted which probably contributes to its poor biological and chemical quality, but watercourses are important for biodiversity and for acting as wildlife corridors.</td>
</tr>
<tr>
<td><strong>Flooding</strong> – significant risks from flooding, especially with changing climate</td>
<td>Cheltenham has over 4000 properties at risk from flooding and many existing urban drainage systems cause further problems of flooding, pollution or damage to the environment. Information is not available from the Environment Agency regarding surface water runoff and groundwater flooding but recent experience shows that existing drainage systems and flood attenuation schemes will not be able to cope.</td>
<td>As the climate changes serious flooding is likely to become a more frequent event and the current 1 in 100 yr flood risk will occur more often. More concentrated periods of heavy rainfall will also increase pressure on existing drainage systems, which may not be able to cope with the increased level of surface water runoff.</td>
</tr>
<tr>
<td><strong>Water consumption</strong> – residents making good progress by consuming less water than UK average but climate change could impact on resources</td>
<td>For the only year with data, residents in Cheltenham consumed 10% less water than the national average which is extremely positive.</td>
<td>Water consumption and demand for water will become an increasingly important issue as the climate changes. Warmer wetter winters and hotter drier summers mean that a greater proportion of rain will fall within a shorter time period and probably in more intense bursts. Storage of water will be an issue, especially as demand is likely to be higher during long periods of hot weather, which may result in water shortages.</td>
</tr>
</tbody>
</table>
4.8.5 In some instances, evidence may be lacking. For example, LPAs may find that information on designated wildlife sites is readily available whereas data on the status of biodiversity in the wider countryside is hard to come by. It will be important to record any gaps in the evidence base and raise awareness of these in the scoping report. This will be particularly important in cases where anecdotal evidence suggests a problem but the evidence to substantiate it is not available. Identifying data gaps is also important since under the SEA Directive, LPAs should record any difficulties encountered in compiling the required information.

The environmental report should include “a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”

SEA Directive (Annex I(h))

4.9 Developing the SA framework

“On the basis of the issues identified, sustainability appraisal objectives can be defined to test how likely the proposals in the plan and alternative options are to lead to sustainable outcomes.”

The Plan Making Manual

4.9.1 SA has generally been based on an ‘objectives-led approach’. Essentially, those responsible for the SA develop – in consultation with stakeholders - a series of objectives which set out what is ideally to be achieved or tackled in terms of sustainable development. These objectives are wider than the plan objectives (which are typically more focused in their ambition and more oriented towards delivery). They provide a benchmark against which the content of the emerging DPD – including options - can be assessed. The degree to which the DPD is anticipated to contribute towards these objectives then provides a measure of its sustainability.
4.9.2 Box 4 highlights some tips for developing SA objectives.

**Box 4: Tips for developing SA objectives**

- Keep the number of objectives to a manageable number (12–20 maximum)
- Develop sub-objectives (or criteria or questions) for each objective as prompts for those undertaking the appraisal in order to ‘tease out’ impacts
- Where appropriate, draw on existing sets of objectives (for example, those set out in the relevant regional sustainable development framework or the sustainable community strategy), but make sure the objectives reflect the key issues for the area
- Write the objectives using plain English and keep them strategic – that is, concentrate on the ends rather than the means (for example, where an LPA knows that air pollution from traffic is an issue, the strategic objective would be to promote cleaner air as opposed to promoting public transport, walking and cycling – the latter is more likely to be a plan objective)
- Ensure there is a reasonable balance across the objectives in terms of economic, social and environmental issues – bear in mind that many objectives are crosscutting (for example, increasing employment is an economic and social issue)
- Ensure that you understand the implications of each proposed objective – for example, ‘minimise’ can have very different connotations to ‘reduce’
- Provide a brief commentary on each objective for the benefit of stakeholders, explaining the terms used and what the objective is looking to promote
- Remember that the SEA consultation bodies may want to see discrete objectives devoted to their areas of interest
An alternative approach

4.9.3 It should be noted that the development of objectives is not expressly required under the SEA Directive; however, objectives can provide a tool to tease out the impacts of options and the emerging plan. Having said this, some LPAs have stopped short of developing SA objectives and have instead use a series of topics and / or sub-areas as the framework for undertaking the appraisal. For example, the scoping reports for East Hertfordshire, Epping Forest and Harlow Districts are based on a topic and sub-area based approach.

4.9.4 The use of SA objectives tends to lead to a matrix-based approach to appraisal whereby each option / preferred option / draft policy is pitched against each SA objective. This can result in pages and pages of matrices and result in long and impenetrable reports. Using topics and sub-areas as the basis for the appraisal promotes a more narrative based approach centred on an assessment against the baseline situation (a key requirement under the SEA Directive). What this approach looks like in practice and its potential benefits are further discussed in 4.11 and 5.8.

4.9.5 In the final analysis, regardless of whether an ‘objectives-led’ or ‘baseline-led’ approach is followed, the identification and evaluation of impacts should be based on a combination of evidence and professional judgement.
4.10 Consultation on the scope

“The authorities … which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes … shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report”

SEA Directive Article 5(4) and 6(3)

4.10.1 Consultation on the scope provides an opportunity to canvass views on the evidence base assembled, the sustainability issues identified and, where applicable, the SA objectives. It also allows LPAs to consult stakeholders on the level of detail the appraisal will enter into. For example, will the appraisal investigate site-specific impacts? This depends on the DPD’s position in the planning hierarchy and has implications for the depth of evidence assembled.

4.10.2 SA steering groups and scoping workshops can help at this stage, particularly with regards to identifying the issues and ensuring that these are reflected in any SA objectives.

4.10.3 Although a formal scoping report is not mandatory, producing one provides the opportunity to present the evidence base assembled so far and begin the process of stakeholder engagement. In order to help satisfy the SEA Directive’s requirements, the report should cover:

- other PPPSIs and sustainability objectives relevant to the plan including the key messages distilled from these
- baseline information (including the future situation without the plan), either already collected or still needed, with notes on sources and any problems encountered
- economic, social and environmental issues identified
- suggested SA objectives
• proposals for the structure of the SA report and the level of detail it will enter into

4.10.4 The report should be published as a draft for consultation with the SEA consultation bodies and other stakeholders and the public\(^5\). The SEA consultation bodies have produced a note setting out the services and standards that LPAs can expect from them in relation to SEA / SA. It explains that the bodies will normally focus much of their effort at the scoping stage. Once an LPA has consulted on the draft report it should document and consider the submissions received and respond as appropriate. The responses and any subsequent changes can be documented in an appendix in the final scoping report, which can be made available on the LPA’s website (notwithstanding the fact that the scoping report should be something of a ‘live’ document – see 4.10.7).

Including options

4.10.5 The scope of the SA should reflect the options being considered. For this reason, the scoping report should ideally include an overview of the likely options to be considered through the plan-making process. This will assist stakeholders in determining whether or not the right issues have been identified and the appropriate evidence is in place in order to appraise the options.

Application to different LDDs

4.10.6 The scoping report can cover any number of DPDs and SPDs provided that the evidence it contains or points to and the framework it sets out is appropriate for appraising the DPDs and SPDs in question. However, the evidence required to appraise different LDDs may be quite different, and separate reports may be more appropriate in some cases. One approach is to develop a ‘general’ scoping report applicable to the core strategy and to subsequently prepare ‘addendums’ to this report setting out the evidence base and framework for appraising particular DPDs or SPDs.

Updating the scoping report

4.10.7 To support a sound appraisal it is important that the information used to anticipate and evaluate impacts remains up-to-date and relevant. The scoping report is therefore best viewed as a ‘live document’ and should be updated on a reasonably regular basis (and certainly between tranches of DPD preparation). This update could take the form of a wholesale review of the document or, alternatively, LPAs could produce an addendum setting out the policy context and the baseline information to have emerged since the original report was

\(^5\) The designated bodies for Wales and Scotland should also be consulted by authorities close to these borders or where significant cross-border effects are likely. The bodies concerned in Scotland are Natural Scotland, the Scottish Environment Protection Agency and Scottish Heritage, and in Wales the Countryside Council for Wales and Cadw.
prepared, together with any additional sustainability issues and suggested amendments to the SA framework. If the policy context, the evidence base or the issues have changed substantially since the original report was prepared and have significant implications for the content of the plan, it may be advisable to consult the SEA consultation bodies, other stakeholders and the public on the revised report / addendum. However, if the changes are not likely to significantly influence plan content then further consultation is unlikely to be helpful. However, the SEA consultation bodies should be notified that the scoping report has been updated and directed towards the relevant web pages. Another approach is to include any updates to the policy context, baseline, sustainability issues or SA framework in SA reports published at the options, preferred options or draft plan stages, rather than actively reviewing the scoping report.

4.11 What might the scoping report look like?

4.11.1 Many scoping reports present, in sequence, the policy context followed by the baseline, the issues and the SA objectives. An alternative approach involves documenting this information on a topic-by-topic basis. For example, an LPA could prepare a series of topic papers or chapters covering issues such as biodiversity, flood risk, housing, the local economy, waste and water (see Table 2). Each topic paper could be structured around the key questions from the SEA Directive. For example, for climate change adaptation and flood risk the LPA could ask:

- What’s the policy context (e.g. PPS25 Development and Flood Risk)?
- What’s the situation now (e.g. the findings from the SFRA)?
- What will be the situation without the plan (e.g. under climate change)?
- What are the key issues (e.g. flood risk in certain parts of the district)?

4.11.2 In addition, the LPA could sub-divide the district or borough and ask these questions for key spatial areas.

4.11.3 This approach has distinct advantages in terms of accessibility and subsequent updating of the report. Organisations can more easily find the information that is likely to be of interest to them (for example, English Heritage can be directed toward the historic environment topic paper), and any one paper can be updated without necessitating a review of the whole report. An LPA can prepare additional topic papers for particular DPDs as these are developed. However, an LPA should always prepare an overarching introductory paper to summarise the issues and problems facing the area including linkages between the different topics.
5 Appraisal

5.1 Introduction

5.1.1 This section provides advice on undertaking the appraisal itself. The section begins with advice on assessing options and is followed by guidance on identifying mitigation and enhancement measures.

5.2 What will be the situation with the plan?

The environmental report should include “the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;

(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects”

(Annex I(b))

5.2.1 Identifying and evaluating the likely significant effects of the plan requires systematic consideration of the measures (or ‘choices’) which together make up the plan. Depending on the nature of the DPD, these can include:

- strategic objectives
- options
- preferred options / draft policies
- sites.
5.3 Strategic objectives

5.3.1 Core strategies in particular should include a set of strategic objectives for the area focussing on the key issues to be addressed. According to PPS12, these objectives should form the link between the high level vision and the detailed strategy.

5.3.2 To help ensure that the strategic objectives provide an appropriate basis for developing the plan, the DPD’s draft objectives should be tested to ensure that they reflect sustainability principles. In practice, this involves comparing the DPD objectives with the SA objectives (if SA objectives have not been developed, the DPD objectives can be compared with the key sustainability issues identified during the scoping stage). This comparison is often undertaken using a simple matrix which compares one set of objectives with the other (see Table 6).

Table 6: Comparing DPD and SA objectives

<table>
<thead>
<tr>
<th>DPD objective</th>
<th>Objective 1</th>
<th>Objective 2</th>
<th>Objective 3</th>
<th>Objective 4</th>
<th>SA objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective 1</td>
<td>✓ compatible</td>
<td></td>
<td></td>
<td></td>
<td>Objective 1</td>
</tr>
<tr>
<td>Objective 2</td>
<td>✓ compatible</td>
<td></td>
<td>✓ compatible</td>
<td></td>
<td>Objective 2</td>
</tr>
<tr>
<td>Objective 3</td>
<td>✓ compatible</td>
<td>✓ compatible</td>
<td></td>
<td></td>
<td>Objective 3</td>
</tr>
<tr>
<td>Objective 4</td>
<td>X incompatible</td>
<td>✓ compatible</td>
<td>✓ compatible</td>
<td>✓ compatible</td>
<td>Objective 4</td>
</tr>
</tbody>
</table>

5.3.3 In practice, this can seem a rather abstract exercise. Therefore, it may be more useful to produce a written commentary on the draft DPD objectives which asks:

- Do the DPD objectives reflect the key sustainability issues for the area identified at the scoping stage (bearing in mind that some of these issues may be beyond the DPD’s capacity to influence)?

- Are the DPD objectives internally consistent and, if not, can any tensions be resolved early on?
5.4 Options

5.4.1 Plan-making should generate well thought out and clearly articulated alternatives and SA should focus primarily on appraising these options. PAS has produced separate guidance on options generation and appraisal which is available at www.pas.gov.uk/options. SA should focus on appraising the reasonable options put forward during frontloading followed by the preferred options and the pre-submission plan policies. As the plan develops and becomes increasingly detailed, so the appraisal findings are likely to become progressively more detailed and conclusive.

5.4.2 The effects of the different options should be identified and evaluated with reference to the baseline situation. The scoping report (see Chapter 4) should set out the baseline, although other sources of information (e.g. evidence base studies completed after the scoping report has been finalised) should be drawn on as appropriate. The SA objectives developed as part of the scoping stage provide a series of prompts for drawing out the impacts of the different options.

5.4.3 In practice, LPAs will generally appraise the options against each other and use the SA objectives as a means to highlight the differences between them (that is, their relative performance). However, it will also be important to identify their absolute performance against the SA objectives and the baseline and their relationship with other elements of the plan.

5.4.4 In some cases, the business-as-usual option can be included as a discrete alternative (for example, ‘continue with the existing local plan policy’), although in some cases such an option will not be feasible (due, perhaps, to a change in government policy since the local plan was adopted). Given the duty under the Planning and Compulsory Purchase Act 2004 on those preparing a DPD to contribute to sustainable development, it is essential that the plan sets out to improve on the situation that would have existed if there was no DPD; therefore, examining the business-as-usual option may be a valuable exercise. However, if the business-as-usual option does not represent a genuine choice, LPAs should consider carefully whether or not to include it and, if they do, emphasise its inclusion only as a comparator. It should be noted that the ‘business-as-usual’ scenario for the plan area as a whole is established at the scoping stage (see 4.7).
Significant effects

5.4.5 The aim of the SA is to identify and respond to significant effects. What constitutes significant will vary according to circumstance; however, as the Plan Making Manual points out, “Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification”.

5.4.6 In appraising the significance of effects, the Plan Making Manual includes a series of principles which may be helpful:

- significance has to be determined individually in each case - effects which are significant in one situation are not necessarily significant in another;
- analysis of significance needs to be proportionate to the expected severity of the effect; and
- mathematical models are sometimes difficult to use to determine significance - inappropriate use of numeric models could give rise to fictitious precision and attempts to quantify qualitative and semi-qualitative aspects are unlikely to lead to an increase in objectivity.

5.4.7 Annex II to the SEA Directive also includes a series of criteria for determining the likely significance of effects – see Box 5.
Box 5: Criteria for determining the likely significance of effects (from Annex II to the SEA Directive)

- the probability, duration, frequency and reversibility of the effects
- the cumulative nature of the effects
- the risks to human health or the environment (e.g. due to accidents)
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)
- the value and vulnerability of the area likely to be affected due to:
  - special natural characteristics or cultural heritage,
  - exceeded environmental quality standards or limit values,
  - intensive land-use
- the effects on areas or landscapes which have a recognised national, Community or international protection status

Case study: Aylesbury Vale

5.4.8 Under government plans, major growth is proposed for Aylesbury Vale, the majority of which will be at Aylesbury. In preparing its core strategy, Aylesbury Vale District Council considered three different options for the development of the town (see Figures 3 – 5):

- An eastern growth arc
- The southern growth arc
- A combined eastern and southern growth arc

5.4.9 All the options provide sufficient land for about 10,000 new homes as well as land to supply the necessary infrastructure and green space.
Figure 3: Spatial options for Aylesbury, eastern growth arc

Figure 4: Spatial options for Aylesbury, southern growth arc
5.4.10 The council commissioned consultants to undertake an SA of the three options and their report was published alongside the options for consultation. The consultants appraised each option against a series of 17 SA objectives. The consultants did not recommend a preferred option but described the strengths and weaknesses of each option and suggested potential approaches to mitigating adverse effects. As part of the appraisal process, the council held a stakeholder workshop to discuss the objectives for appraising the options and the impacts of the options themselves. A range of stakeholders attended the workshop including county council officers, Natural England and the Wildlife Trusts.

5.4.11 To inform the appraisal of the three options, the consultants identified the business-as-usual scenario for the area and undertook an appraisal of its implications. This scenario reflected growth already committed in the adopted local plan; existing transport proposals; and the continuation of certain trends (e.g. in terms of levels of job creation). The consultants concluded that, among other things, the business-as-usual scenario would have a major negative impact in terms of satisfying housing need. In undertaking the SA, the consultants also drew on a range of evidence base studies but also recorded those evidence base studies which had yet to be completed and could not therefore inform the appraisal. They also highlighted the assumptions made in
appraising the options; for example, it was assumed that certain transport infrastructure – the eastern link roads – would be put in place regardless of the option taken forward.

5.4.12 The consultants undertook a full appraisal of three options against the 17 SA objectives using a series of matrices – see Tables 7 and 8 for examples - and produced a summary table – see Table 9.

Table 7: SA of spatial options for Aylesbury – housing

| Objective 1. To ensure that everyone has the opportunity to live in a decent, safe and sustainably constructed home |
|---------------------------------------------------|---------------------------------------------------|---------------------------------------------------|
| Option 1 East | Option 2 South | Option 3 Hybrid |
| Score | Commentary / explanation | Score | Commentary / explanation | Score | Commentary / explanation |
| ++ | See comments below | ++ | See comments below | ++ | See comments below |

Conclusions and summary:
Options 1, 2 and 3 would each deliver 10,000 units. They will be expected to meet the relevant Code for Sustainable Homes level. In terms of affordability and mix, the development are likely to include:

- 35% Affordable Housing required on each site;
- tenure mix 75% rented/25% shared ownership;
- mix likely to be 30% 3 bed; 30% 2 bed; remainder 1 beds flats & 4/5 bed houses.

About 32% of the county’s households contain dependent children, which is slightly above the regional and national average (Aylesbury Vale the highest). This group are projected not to increase, although since most of the county’s increased housing stock is planned to be in major urban extensions, there are questions of mix and balance which argue against a focus only on smaller dwellings for the increased number of smaller (and older) households.

Sources of information:
Strategic Housing Market Assessment July 2008
Updated infrastructure schedules for the three growth arcs, supplied by AVDC Sept 08.
Table 8: SA of spatial options for Aylesbury – transport

Objective 6. To encourage the use of sustainable and integrated methods of transport and promote policies which reduce the need to travel in order to reduce negative effects on the environment

<table>
<thead>
<tr>
<th>Option 1 East</th>
<th>Option 2 South</th>
<th>Option 3 Hybrid</th>
</tr>
</thead>
<tbody>
<tr>
<td>Score</td>
<td>Commentary / explanation</td>
<td>Score</td>
</tr>
<tr>
<td>---</td>
<td>This option performs worst in terms of promoting sustainable transport modes. The modelling predicts a 36% increase in car journeys compared to 2005. Impacts on air and noise pollution depend on whether the Eastern Link Roads are developed. (see conclusions below)</td>
<td>---</td>
</tr>
<tr>
<td>New transport infrastructure required: Northern Link Road, Eastern Link Roads, part of the South East Distributor Road (total road link costs around £58m); 3 park and rides etc.</td>
<td>New transport infrastructure required: Eastern Link Roads, Southern Distributor Road (total road link costs around £64m); 4 park and rides etc.</td>
<td></td>
</tr>
</tbody>
</table>

New transport infrastructure required: Eastern Link Roads, Southern Distributor Road (total road link costs around £64m); 3 park and rides etc.
Conclusions

The transport modelling for all options looked at the likely impacts with and without the eastern link roads. The conclusions do not clearly favour one option over the other, though they do identify differences in types of transport impacts. Impacts on greenhouse gas emissions and accessibility are not currently addressed by the models.

In terms of promoting sustainable transport modes, all options would result in significant increases in car journeys. Even with the projected implementation of a ‘Smarter Choices’ programme, the three growth options would result in a third more car journeys than 2005 levels. However, the modelling shows that option 2 performs significantly better than the other growth options. It predicts 4500 less car journeys per day (i.e. 4500 more journeys in sustainable modes) for 2026 compared to option 3. Option 1 is slightly worse than option 2 with an additional 700 journeys per day predicted. With options 2 and 3 there is also more opportunity to allow for new cycling and walking routes from the planned new development than there is for option 1.

Given the increase in car journeys, it is unsurprising that the transport modelling also shows that there is likely to be a significant increase in traffic congestion by 2026 for the three options. This is likely to have significant environmental impacts arising from air and noise pollution. However, the TN4 paper (see reference below) notes that the three growth options overall are not likely to result in a significantly worse impact compared to the committed local plan growth, provided the eastern link roads are developed (although it predicts some worsening in the evening peak).

The TN 4 paper predicts that, without the eastern links, there would be a marked worsening of congestion for all 3 options (compared to committed local plan growth), with option 3 performing best of the three. This has implications for environmental impacts such as air quality and noise, in particular the air quality management area identified at the junction of Tring Road and Oakfield Road. However, for the purposes of this appraisal, the eastern link roads are included within each growth option. The deliverability of the eastern links is clearly a key issue for the council.

In terms of travel efficiency the transport modelling also suggests that with the eastern link roads, option 1 is the most efficient option in terms of travel time (i.e. it would result in the lowest journey times) and a combined measure of travel time and travel distance (this measure is called the generalised cost index, since it is used by the Government to represent the monetary value of travelling by car). However, option 2 is the best in terms of travel distance. The TN4 paper notes that “in terms of environmental impacts, the use of the
The use of generalised cost alone to determine rankings may not be entirely satisfactory. An accurate measure of environmental impacts might have to give higher weight to total distance travelled and to queuing time than to the other elements of generalised cost. Therefore, whilst option 1 ranks best in terms of the generalised cost index, with option 2 next best, the TN4 paper goes on to conclude that “the better performance of the Southern Option [option 2] in respect of total distance travelled could put it on a par or slightly above the Eastern Option [option 1].”

Thus, whilst sometimes claimed, it is uncertain whether the generalised cost measure can be seen as a proxy for environmental impacts like emissions affecting air quality and climate, noise and community severance. As noted above in terms of congestion, there is little difference between the models. It may be that the efficiency results do reflect differences in other transport impacts such as accessibility and greenhouse gas emissions. However, these impacts have not been modelled for the growth options. These issues are addressed separately in objectives 3 and 11 of this SA framework.

Summary

In summary therefore, all options are likely to result in significant environmental impacts arising from increased car journeys and increased congestion. The projected increases assume the implementation of a ‘Smarter Choices’ programme (which evidence suggests can reduce car trips by around 10%). Development of the growth options without the link roads is likely to result in significantly worse congestion, leading to significantly worse environmental impacts arising from air and noise pollution. These impacts are likely to be particularly significant at the junction of Tring Road and Oakfield Road, which is a designated air quality management area.

If the eastern link roads are developed, all options are likely to result in similar levels of congestion. Option 2 is likely to perform better than options 1 and 3 in promoting sustainable transport options. Accessibility, greenhouse gas emissions and health impacts of the options are addressed by other appraisal objectives. It is recommended that: further investigations need to be undertaken to put in place the interventions to mitigate the impacts of increased car journeys and congestion, immediate priority be given to the implementation of a ‘Smarter Choices’ initiative. The final core strategy will need to action this point.

Sources of information

Aylesbury Land Use Transport Strategy (ALUTS) LDF Technical Note 4, Halcrow Group, 29 August 2008 (‘TN4 paper’)
ALUTS Summary Stats (provided by Buckinghamshire County Council)
Updated infrastructure schedules for the three growth arcs, supplied by AVDC Sept 08.
Table 9: SA of spatial options for Aylesbury: summary

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Option 1 East</th>
<th>Option 2 South</th>
<th>Option 3 Hybrid</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Housing</td>
<td>++</td>
<td>++</td>
<td>++</td>
</tr>
<tr>
<td>2. Crime and safety</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>3. Access to services</td>
<td>-</td>
<td>+</td>
<td>0</td>
</tr>
<tr>
<td>4. Community identity</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>5. Health and equalities</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>6. Transport and travel</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>7. Water and climate change adaptation</td>
<td>-?</td>
<td>-</td>
<td>-?</td>
</tr>
<tr>
<td>8. Biodiversity</td>
<td>--</td>
<td>?</td>
<td>--</td>
</tr>
<tr>
<td>9. Green infrastructure</td>
<td>-</td>
<td>+</td>
<td>+</td>
</tr>
<tr>
<td>10. Landscape and Heritage</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>11. Energy and climate change</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>12. Waste</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>13. Land use efficiency</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>14. Flooding</td>
<td>-?</td>
<td>+?</td>
<td>-?</td>
</tr>
<tr>
<td>16. Economy</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>17. Skills</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

++ Major positive impact | ? Uncertain | + Minor positive impact | - Minor negative impact | 0 Neutral | -- Major negative impact
Impact dimensions

The environmental report should include “the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;

(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects”

(Annex I(b))

5.4.13 When appraising options / preferred options / draft policies, LPAs need to address various ‘impact dimensions’ including secondary, cumulative, synergistic, short, medium, and long-term permanent and temporary, positive and negative effects. Secondary, cumulative and synergistic effects are defined in Box 6.
Box 6: Secondary, cumulative and synergistic effects (from A Practical Guide to the Strategic Environmental Assessment Directive)

**Secondary or indirect effects** are effects that are not a direct result of the plan, but occur away from the original effect or as a result of a complex pathway. Examples of secondary effects are a development that changes a water table and thus affects the ecology of a nearby wetland; and construction of one project that facilitates or attracts other developments.

**Cumulative effects** arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.

**Synergistic effects** interact to produce a total effect greater than the sum of the individual effects. Synergistic effects often happen as habitats, resources or human communities get close to capacity. For instance a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.

5.4.14 Appendix 8 in ‘A Practical Guide to the Strategic Environmental Assessment Directive’ provides further advice on identifying secondary, cumulative and synergistic effects.

5.4.15 If a matrix-based approach to the appraisal is being used, the matrix can be designed to provide an opportunity to record the temporal aspects of the impacts (short, medium, long-term, permanent and temporary).

5.4.16 The identification of secondary or indirect impacts can be facilitated through drawing up flow diagrams or a network diagram which trace the outcomes arising from different options / preferred options / draft policies. Identifying cumulative impacts involves looking at the total effect of the plan as a whole on different receptors. Receptors include natural resources (air, biodiversity, soil, water) and particular sections of the population (e.g. those living in deprived areas). Assuming that an objectives-led matrix-based approach has been followed, the identification of cumulative effects can be facilitated by creating a table summarising the effects of the preferred options / draft policies against the full set of objectives. This might reveal, for example, that certain objectives...
are repeatedly subject to negative effects with the potential for a damaging cumulative impact.

5.4.17 If a topic / sub-area approach has been followed, LPAs can draw up a table for each topic or sub-area summarising the key impact dimensions – see Table 10 for an example.

Table 10: Documenting different impact dimensions

<table>
<thead>
<tr>
<th>Topic: Biodiversity and green infrastructure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short-term effects (first five years of the plan)</td>
</tr>
<tr>
<td>Medium-term effects (5 – 10 years hence)</td>
</tr>
<tr>
<td>Longer-term effects (beyond the lifetime of the plan)</td>
</tr>
<tr>
<td>Geographical areas likely to be significantly affected</td>
</tr>
<tr>
<td>Permanent vs. temporary effects</td>
</tr>
<tr>
<td>Secondary or indirect effects</td>
</tr>
<tr>
<td>Cumulative effects</td>
</tr>
</tbody>
</table>
Preferred options / draft policies

5.4.18 Once preferred options have been chosen (taking into account the findings of SA and community engagement), these should be re-appraised. SA at this stage will provide an opportunity to identify mitigation measures (see 5.6) and potential indicators for monitoring significant effects (see Chapter 9). In some cases, preferred options may be conveyed in terms of statements of policy intent, while in other cases they may be expressed in the form of detailed policy wording. Several iterations of appraisal may therefore be necessary as plan policies are developed.

5.4.19 It is important to ensure that a full SA is done once the plan policies have been drafted. The devil is often in the detail and the relative sustainability of a policy may ultimately depend on the wording used; ‘encourage’ can have very different connotations to ‘require’, for example.

5.4.20 Box 7 highlights some tips for undertaking the appraisal stage.
Box 7: Tips for undertaking the appraisal

- The appraisal – particularly of the options – is best undertaken by a team in a format that facilitates discussion; the plan authors should be involved to help ensure that the appraisal findings are taken into account in preparing the plan.

- Developing flow diagrams can assist in identifying cause-and-effect and explicitly identifying indirect and secondary effects; these diagrams can be developed by the appraisal team around the table.

- When using symbols or other ways of presenting information regarding the likely effects (e.g. positive, negative, uncertain), always explain and justify the choice of symbol with reference to the baseline situation relevant to the SA objective (thus demonstrating an evidence based, baseline-led approach).

- Use quantitative modelling where this is likely to be helpful; for example, the results of transport modelling may be helpful in distinguishing between spatial options in terms of their likely impacts on air quality, amenity and climate change.

- When appraising strategic options, considerable uncertainty is likely to exist regarding implementation; with this in mind, ask questions such as ‘what if employment opportunities do not keep pace with household growth?’; ‘what might happen if critical infrastructure doesn’t follow development’?

- When identifying effects, consider whether the effect is likely to be permanent or temporary as well as the timescale over which the effect is likely to be observed; for example, short-term effects may be categorised as those which are likely to occur in the first five years of the plan, medium-term effects as those that take place between five and 15 years hence, and longer-term impacts as those that happen beyond the lifetime of the plan.

- The appraisal should consider the extent to which options / preferred options / policies will be effectively delivered on the ground to help avoid unrealistic assessment results; for example, if the evidence base suggests that policies to ensure a certain level of affordable housing in new development have not been fully implemented in the past, the appraisal of any similar policy might need to be cautious in its assessment.

- Consider the effects of the plan on neighbouring areas; for example, is the plan likely to displace environmental problems or lead to increased traffic generation in adjacent authorities?
5.5 Sites

“It is good practice for authorities to use a ‘strategic sift’ to exclude those sites which breach higher level policies and are, therefore, not reasonable alternatives. The factors used in the strategic sieving process should be clearly recorded in the SA report”


5.5.1 Each key location or site considered for inclusion in a DPD (NB: core strategies may include strategic sites, i.e. those pivotal to the delivery of the overall strategy) should be conceived of as a discrete option. In the case of key locations, it may be possible to directly compare different options (e.g. Area A, B or C for a new urban extension, retail centre or leisure complex). However, it will not generally be feasible to compare every small scale site against every other small scale site and this is arguably inappropriate. Instead, potential sites – identified for example through a SHLAA – should be progressively filtered until a ‘short list’ of reasonable sites options is generated.

“Local authorities are strongly encouraged to seek out major landowners and developers and engage them fully in the generation and consideration of options”.


“all those promoting an alternative site or sites should do so at the issues and options stage so that these can be fed into the SA work being done by the LPA.”


5.5.2 In order to ensure that all potential site options are identified, LPAs should ensure that site promoters are provided with a clear opportunity to put forward sites for consideration at an early stage in the plan-making process.
5.5.3 In filtering sites, three broad sets of criteria could be used:

- **Exclusionary criteria** – e.g. flood risk areas, areas of outstanding natural beauty (AONB) and green belt (depending on the circumstances) and areas outside the pattern of development set out in the core strategy. Sites which do not satisfy these criteria should be excluded from the mix on the basis that they are not ‘reasonable’ alternatives.

- **Discretionary criteria** – e.g. relating to public rights of way, agricultural land, local nature conservation designations etc. These criteria might not necessarily lead to the exclusion of a site but would certainly be important from a sustainability perspective and should influence the decision as to whether or not a site is taken forward (and, if it is, the conditions that might be attached to any development). **These criteria should reflect the issues / topics / objectives used as the basis for the SA; this will obviate the need to undertake a separate and resource-intensive SA of the sites.** These discretionary criteria may also encompass issues identified as important on the Sustainable Community Strategy (e.g. the retention of particular areas or types of open space).

- **Deliverability criteria** – e.g. landownership, access, planning history, size etc. all of which may have a bearing on whether or not the site is deliverable as a location for development

5.5.4 These criteria can be set out in proforma which can then be completed for each site. This will help to ensure a rigorous and consistent approach to appraising site options. Depending on the circumstances, the LPA could also consider alternative uses for particular sites (e.g. for housing, employment, retail, community facilities, mixed use etc.). This being the case, the proforma could be adapted to include an appraisal of different potential uses.

5.5.5 Completing the proformas will require a reasonably detailed knowledge of the sites and their surrounds. For example, it will be necessary to know how close the various sites are to designated areas (SSSIs, conservation areas, and so on) and the relative level of public transport access. The use of GIS data at this stage is therefore likely to be crucial. An LPA may also decide to set indicative thresholds – for example, 200 metres from a bus stop or 400 metres from railway station with a regular service – to determine the sustainability of different sites. These could be contentious and it would be sensible to consult stakeholders early on regarding the site appraisal criteria; this could be facilitated through consultation on a scoping report for the site allocations DPD setting out the proposed site appraisal criteria.
5.5.6 When undertaking SA for a site allocations DPD, it is important to identify the cumulative effects of all the sites on key receptors (assuming that all the sites are developed).

Case study: Breckland

5.5.7 Breckland Council prepared a scoping report covering the Site Specific Policies and Proposals DPD (and two AAPs). The DPD will identify sites for various uses to meet the district’s needs over the period to 2026. The scoping report includes a set of detailed site specific appraisal questions linked to the SA objectives which will be used to test site allocation policies in the DPD (and the two AAPs) – see Table 11. In addition, all site specific proposals will be tested for their conformity with the Breckland Core Strategy and their deliverability.
### Table 11: Breckland site specific policies SA framework (extract)

<table>
<thead>
<tr>
<th>SEA/SA Topic</th>
<th>Sustainability Appraisal Objective</th>
<th>Decision making (Appraisal) questions</th>
<th>Detailed Site Specific Appraisal Questions?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land, water and Soil</td>
<td>1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings.</td>
<td>Will it use land that has been previously developed?</td>
<td>Is the land mostly brownfield/previous developed? (yes=+, no=-)</td>
</tr>
<tr>
<td>Resources</td>
<td></td>
<td>Will it use land efficiently?</td>
<td>n/a dependent on type and design of development not location</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Will it protect and enhance the best and most versatile agricultural land?</td>
<td>Is the site on high grade land (1,2,3)? (yes=+, no=-)</td>
</tr>
<tr>
<td></td>
<td>2. Limit water consumption to the capacity of natural processes and storage systems.</td>
<td>Will it reduce water consumption?</td>
<td>n/a dependent on type and design of development not location</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Will it conserve groundwater resources?</td>
<td>Would the development of the site have the possibility to harm a protected aquifer? (yes=+, n=-)</td>
</tr>
<tr>
<td>Climate change and air</td>
<td>3. Reduce contributions to climate change.</td>
<td>Will it lead to an increased proportion of energy needs being met from renewable sources?</td>
<td>n/a dependent on type and design of development not location</td>
</tr>
<tr>
<td>pollution</td>
<td></td>
<td>Will it reduce the emissions of greenhouse gases by reducing energy consumption?</td>
<td>n/a dependent on type and design of development not location. Reduction of greenhouse gases and energy consumption by limiting travel is highlighted below</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Will it improve air quality?</td>
<td>Is it a AQMA (y=-, n=0) (does not apply to open space allocation proposals)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Will it reduce traffic volumes?</td>
<td>Is the site within 800m of a school? (y=+, n=-) (Residential allocations only)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Is the site within 300m of convenience shopping? (y=+, n=-) (Residential allocations only) (figure from PPS6)</td>
</tr>
</tbody>
</table>
How can we mitigate adverse (and enhance positive) effects?

The environmental report should include “the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme” (Annex I(g)).

The appraisal should identify the plan’s significant effects. Under the SEA Directive, measures should be proposed to prevent, reduce or offset the significant adverse effects of implementing the DPD. These measures are collectively referred to as ‘mitigation measures’. Measures can also be proposed to maximise the positive effects arising from implementation of the DPD.

Mitigation measures at the strategic level are not the same as those at the project level. Whereas the Environmental Impact Assessment (EIA) for a development proposal may suggest clear mitigation measures such as noise barriers or landscaping, SA is more likely to suggest changes in policy wording or emphasis. For this reason mitigation measures may emerge throughout the SA process as options, preferred options, and draft policies are developed. Therefore in order to demonstrate that steps to mitigate adverse effects (and maximise positive ones) have been made, the audit trail must therefore be clear.

Typical mitigation measures could include (based on Therivel, 2010):

- changes in components / statements within a policy;
- the removal of components / statements that are not environmentally sustainable;
- the addition of new components / statements, including ‘protective’ statements;
- requirements to substitute or offset for certain types of impacts, for instance, through projects that replace any benefits lost through other projects (e.g. a new park near an area of open space that is being developed);
• requirements and terms of reference for EIA of certain types of projects, or sub-components of EIA, such as landscape or traffic assessments (this can increase certainty for developers and speed up scoping of EIA);

5.6.4 At the strategic level, mitigation measures might take the form of recommendations to the plan-makers in terms of potential policy changes (see Chapter 8). For example, the SA of a core strategy might indicate that the level of development envisaged in the area is likely to exacerbate current water stress. With this in mind, those undertaking the SA might recommend that development at certain strategic sites achieves a higher than normal Code for Sustainable Homes level in respect of water efficiency.

5.7 How can we best monitor the plan’s impacts?

The environmental report should include “a description of the measures envisaged concerning monitoring…”

(Annex I(i))

5.7.1 The SA report published alongside the pre-submission DPD should set out the measures *envisaged* concerning monitoring (note these do not need to be finalised at this point). Chapter 9 provides advice on plan monitoring including the identification of significant effects indicators in light of the appraisal findings.
5.8 What might the SA report look like?

5.8.1 Many SA reports present in sequence the findings of the scoping stage (policy context, baseline, sustainability issues, SA objectives) followed by the appraisal findings (generally in matrix form, pitching each plan option / preferred option / draft policy against each SA objective) and concluding with mitigation and monitoring measures. Matrices generally use symbols or colours to show the nature of an impact and its scale or magnitude. An alternative approach involves documenting this information on a topic-by-topic basis. For example, an LPA could prepare a series of topic papers or chapters covering issues such as biodiversity, flood risk, housing, the local economy, waste and water. Each topic paper could be structured around the key questions from the SEA Directive. For example, for flood risk the LPA could ask (following on from the earlier questions – see 4.11):

- What’s the situation **with** the plan (e.g. the need for strengthened flood defences in Market Town D; increased overall number of homes in the district at risk of flooding)?
- How can we mitigate adverse (or enhance positive) effects (e.g. strengthening the stringency of the core strategy policy on sustainable drainage systems)?
- How can we best monitor the plan’s impacts (e.g. including an indicator in the AMR on the implementation of sustainable drainage systems)?
6 Reporting

6.1 Introduction

“At publication, the local authority must produce and publish the sustainability appraisal report alongside the draft development plan document. This should set out how the appraisal was carried out and how options were assessed and carried forward. You can publish the sustainability appraisal report and the draft plan together in one document, or separately. Either way, the relationship between the two documents should be explained.”

“The sustainability appraisal report should indicate clearly which options were not taken forward. It should also draw on the evidence base and appraisals to show why they were not pursued.”

The Plan Making Manual

“The sustainability appraisal is where the consideration and assessment of the main alternatives should be found.”

The Planning Inspectorate (2009). Examining Development Plan Documents: Learning from Experience

6.1.1 This section provides advice on reporting the findings of the SA process. This includes advice on reporting during the preparation of the plan as well as reporting at the publication stage.

6.2 SA reporting (Reg 25)

“in commenting on options it will help the public if the performance of different options is set out in the sustainability appraisal. This is required by the SEA Directive, and enables consultees to see (with the benefit of technical evidence) how different options fare and can in turn use this to assist their own feedback on the options.”

“Public participation early in the process and involvement of the public in considering different options and their impacts will help to ensure that the draft plan published under Regulation 27 is the ‘best plan’ and commands wide support.”

The Plan Making Manual
6.2.1 Many LPAs elect to publish options for consultation as part of the DPD preparation process, for example in the form of an ‘issues and options’ report. In order to provide consultees with an understanding of the impacts of the options and so assist them in formulating their responses, it is helpful to also publish an appraisal of the options. Although a separate SA report may need to be prepared, the ‘issues and options’ paper itself can include information on the impacts as identified by the SA (in terms of the ‘pros’ and ‘cons’ of each option to aid engagement).

6.2.2 Similarly, LPAs may choose to publish a preferred options report or a draft plan prior to publication and, again, an SA report can also be published alongside. Publishing the SA findings at each stage in the plan preparation process will help demonstrate that the SA has played a full and positive role in the development of the plan.

6.2.3 Note that there is some flexibility in terms of what SA reports at the options and preferred options / draft plan stages contain, i.e. they need not contain all of the information cited in Annex I to the SEA Directive. However, in order to ease development of the final SA report at the publication stage, it makes sense to be as rigorous as possible in preparing SA reports at the earlier options and preferred options / draft plan stages.

6.3 SA report (Reg 27)

6.3.1 At the publication stage, the LPA must finalise the SA report for publication alongside the draft DPD. The report should set out:

- How the appraisal was carried out
- Any difficulties encountered in undertaking the appraisal
- The rationale for the options considered
- The story behind the plan’s preparation, including the role of the SA in developing, refining and choosing between options
- The anticipated effects of the draft plan
- Any proposed mitigation or enhancement measures (and information as to how these have been reflected in the draft plan)
- Proposals for monitoring (i.e. potential indicators for monitoring the significant effects identified through the SA)

6.3.2 In preparing the report, the aim should be to ensure that the public are in a position to fully understand the effects of the plan (and the alternatives considered). The public should therefore be able to comment on the plan, the alternatives and the appraisal. The SA report and the draft plan can be
published together in one document, or separately; either way, the relationship between the two documents should be explained.

6.4 Non-technical summary

6.4.1 Under the SEA Directive, LPAs must prepare a non-technical summary covering the information included in the environmental report. Preparing the non-technical summary provides an opportunity to succinctly present the appraisal findings and facilitate engagement. The summary should ideally be a separate document and can be innovatively presented, for example in the form of a leaflet in the case of the SA for Bracknell Forest core strategy. Summaries can also be produced at the scoping stage; for example, Basingstoke and Deane produced a summary of their SA scoping report.

6.5 Signposting compliance with the SEA Directive

6.5.1 The SA report should 'signpost' where it provides information required by the SEA Directive. This could be achieved through the use of a table – see Table 12 for an example.
Table 12: Demonstrating compliance with the SEA Directive

<table>
<thead>
<tr>
<th>SEA Directive requirement (the ‘environmental report’ must include…)</th>
<th>Where in the plan and SA documentation can this be found?</th>
</tr>
</thead>
<tbody>
<tr>
<td>The plan’s objectives and the content of the plan</td>
<td>Chapter 1 of the draft core strategy</td>
</tr>
<tr>
<td>“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes” (Annex I(a))</td>
<td></td>
</tr>
<tr>
<td>The SA methodology, including in relation to consultation</td>
<td>Chapter 2 of the SA report</td>
</tr>
<tr>
<td>“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information” (Annex I(h))</td>
<td></td>
</tr>
<tr>
<td>“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I(e))</td>
<td></td>
</tr>
<tr>
<td>“The [environmental] authorities… shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report” (Article 5(4))</td>
<td></td>
</tr>
<tr>
<td>“The [environmental] authorities… and the public… shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme or its submission to the legislative procedure” (Article 6(2))</td>
<td></td>
</tr>
</tbody>
</table>
### SEA Directive requirement (the ‘environmental report’ must include…)

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Where in the plan and SA documentation can this be found?</th>
</tr>
</thead>
<tbody>
<tr>
<td>The policy context in which the plan is being prepared</td>
<td>Chapter 2 of the draft core strategy (summary) and Chapter 3 of the accompanying SA report</td>
</tr>
<tr>
<td>“an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes” (Annex I(a))</td>
<td></td>
</tr>
<tr>
<td>The sustainability objectives relevant to the plan</td>
<td>Chapter 2 of the draft core strategy (summary) and Chapter 3 of the accompanying SA report</td>
</tr>
<tr>
<td>“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I(e))</td>
<td></td>
</tr>
<tr>
<td>The current baseline situation</td>
<td>Chapter 3 of the draft core strategy (summary) and Chapter 4 of the accompanying SA report</td>
</tr>
<tr>
<td>“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” (Annex I(b))</td>
<td></td>
</tr>
<tr>
<td>“the environmental characteristics of areas likely to be significantly affected” (Annex I(c))</td>
<td></td>
</tr>
<tr>
<td>The likely situation without the plan (the ‘business-as-usual’ scenario)</td>
<td>Chapter 3 of the draft core strategy (summary) and Chapter 4 of the accompanying SA report</td>
</tr>
<tr>
<td>“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” (Annex I(b))</td>
<td></td>
</tr>
<tr>
<td>Key issues for the plan</td>
<td>Chapter 3 of the draft core strategy and Chapter 5 of the accompanying SA report</td>
</tr>
<tr>
<td>“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [Special Protection Areas under the Birds Directive] and 92/43/EEC [Special Areas of Conservation under the Habitats Directive]”</td>
<td></td>
</tr>
<tr>
<td><strong>SEA Directive requirement (the ‘environmental report’ must include…)</strong></td>
<td><strong>Where in the plan and SA documentation can this be found?</strong></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>Key issues relating to European sites</strong></td>
<td>“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [Special Protection Areas under the Birds Directive] and 92/43/EEC [Special Areas of Conservation under the Habitats Directive]” The Habitats Regulations Assessment Screening Report</td>
</tr>
<tr>
<td><strong>The alternatives considered and the rationale behind them</strong></td>
<td>“Where an environmental assessment is required … an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated” (Article 5(1)) “an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information” (Annex I(h)) Chapter 4 of the draft core strategy and Chapter 6 of the accompanying SA report</td>
</tr>
<tr>
<td><strong>The likely significant effects of the plan including the alternatives considered</strong></td>
<td>“the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors” (Annex I(f)) (1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects. Chapter 6 (alternatives) and Chapter 7 (draft plan) of the accompanying SA report</td>
</tr>
<tr>
<td>SEA Directive requirement (the ‘environmental report’ must include…)</td>
<td>Where in the plan and SA documentation can this be found?</td>
</tr>
<tr>
<td>---------------------------------------------------------------</td>
<td>----------------------------------------------------------</td>
</tr>
<tr>
<td>Mitigation and enhancement measures</td>
<td>“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme” (Annex I(g))</td>
</tr>
<tr>
<td>Monitoring arrangements</td>
<td>“a description of the measures envisaged concerning monitoring…” (Annex I(i))</td>
</tr>
<tr>
<td>How the SA findings were taken into account</td>
<td>“The environmental report… [and] the opinions expressed [through the consultation] shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure”</td>
</tr>
<tr>
<td>Non-technical summary</td>
<td>“a non-technical summary of the information provided…” (Annex I(j))</td>
</tr>
</tbody>
</table>
6.6 SA of significant changes following consultation

6.6.1 Following consultation on the draft DPD, the LPA may wish to amend the plan and any significant changes should be appraised and the SA report updated, or a supplementary report produced. Changes that are not significant will not require further sustainability appraisal work. Generally speaking, significant changes are those that result in a change in the direction of policy.

6.6.2 According to the Plan Making Manual, if a site is identified at a late stage in the DPD preparation process, the site promoter will need to collate the relevant SA information. This information must be consistent with the scope and level of detail of the SA conducted by the LPA. It should also refer to the same baseline information in identifying the likely significant effects of the new site.

6.7 The SA report at the submission stage (Reg 30)

6.7.1 Regulation 30 requires submission of the sustainability appraisal report and any revisions or supplements to it to the Secretary of State alongside the draft development plan document.

6.8 Examination

6.8.1 The Plan Making Manual emphasises that there may be circumstances where it appears to the Inspector that the evidence in the SA is insufficient to come to satisfactory conclusions about the soundness of the DPD; in these circumstances the Inspector may suspend the examination until the local authority has updated the SA as appropriate. In addition, under exceptional circumstances where the inspector wants to consider a new option, he/she may require further SA work by the local authority (with input, where appropriate, from the representer promoting the change). The Manual also points out that where the Inspector suggests significant changes in the binding report, she/he will need to be satisfied that sufficient SA material is available to inform the recommendation.
7 Consultation

7.1 Introduction

“The [environmental] authorities…and the public…shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme or its submission to the legislative procedure.”

Article 6(2)

7.1.1 This section provides advice on community engagement as part of the SA process. PAS has prepared separate guidance on community engagement in LDFs available at: www.pas.gov.uk/communityengagement.

7.2 Engagement in SA

7.2.1 Consultation should be undertaken as a minimum at two key points in the SA process:

- On the scope of the SA (see Chapter 4)
- On the SA report accompanying the draft DPD (see Chapter 6)

7.2.2 However, other opportunities exist for engagement as part of the SA process. For example, stakeholders can be engaged through workshops to identify sustainability issues at the scoping stage and events to debate the effects of options (see below).
7.3 Consultation at the options stage

“At examination, LPAs will need to show a clear trail of options generation, appraisal, selection or rejection and the role that Sustainability Appraisal (SA) and community engagement have played in this process.”


7.3.1 Consultation is most useful at the options stage, allowing stakeholders the opportunity to express their views before key choices are made. Consultation at the options stage often involves the publication of an ‘issues and options’ paper. These highlight key opportunities and challenges facing the area in question together with alternatives for addressing these. In addition to relatively straightforward consultation through issues and options papers, consultation at the options stage lends itself to more deliberative approaches. Deliberative consultation encourages stakeholders to go through a stage of ‘deliberation’ or weighing up the pros and cons to come to a decision – in this case on which of a range of options is preferable. To do this they need to be provided with, and understand, all relevant information before the discussion and decision-making can take place. This information needs to be presented in an accessible way in order to make it easily assimilated by non-experts. Deliberation can be undertaken through focus groups, pre-existing panels or forums, workshops or steering / advisory groups.
8 Decision-making

8.1 Introduction

“The environmental report… [and] the opinions expressed [through the consultation] shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.”

Article 8

“It is likely that SA work will be a key piece of evidence as LPAs explain the choices suggested, perhaps by outlining the advantages and disadvantages of the various options. If the strategy chosen is not endorsed by the SA the reasons for the choice of strategy contrary to the SA will need to be fully justified. Failure to do so is likely to result in a finding of unsoundness.”


“In examining some plans it has not been as clear as it might be how and why the final strategy has been selected from the options originally presented. The role of the SA in the choice is sometimes not clearly articulated despite the presentation of vast amounts of sustainability data.”

The Planning Inspectorate (2009). Examining Development Plan Documents: Learning from Experience

8.1.1 This chapter provides advice on taking into account the SA findings as part of the plan preparation process.
8.2 Taking the SA findings into account

8.2.1 It will be important to ensure that the SA findings are explicitly taken into account during the preparation of the plan. This will be key to demonstrating the SA’s role in the choice of options and in order to prepare the SA Statement (see section 8.3).

8.2.2 One means to ensure that the SA findings can be explicitly taken into account is to request that those undertaking the appraisal provide formal recommendations to which the plan-makers can respond; this response can be recorded together with any subsequent amendments to the emerging plan for the benefit of the audit trail.

Case study: Sevenoaks

8.2.3 Sevenoaks District Council appointed consultants to undertake the SA of their core strategy preferred options. To demonstrate how the SA findings were integrated into the plan, the SA report includes a table summarising key recommendations to which the council provided a specific response – see Table 13. This process provides a clearly defined and transparent audit trail helping to demonstrate to stakeholders, as well as the Planning Inspectorate, that the SA has played a clear role in plan preparation. If consultants are commissioned to undertake SA, it is helpful to provide them with a ‘working draft’ of the plan which they can appraise and provide recommendations on; the LPA can then respond to the recommendations and make any necessary amendments to the plan.
### Table 13: SA recommendations in relation to Sevenoaks Preferred Options (extract)

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Brief Description</th>
<th>Related Policies</th>
<th>Monitoring</th>
<th>Council Comments</th>
</tr>
</thead>
</table>
| Greater emphasis on green corridors and cycling and walking infrastructure | Given the poor current provision of cycling routes within the district, the high rates of car ownership and CO₂ emissions per capita, and the low level of control the Council has over public transport service providers there should be more of an emphasis on delivering green corridors within new and existing development and in the overall provision of cycling and pedestrian infrastructure. While these elements will be addressed within the local transport strategy, allocations DPD and site development briefs, they should also figure more prominently in the core strategy. | Locational policies  
• SP1  
• SP2  
• SP10  
• SP11 | Congestion – average journey time per mile during the morning peak (National Indicator (NI) 167)  
Access to services and facilities by public transport, walking and cycling (NI 175)  
Amount of new residential development within 30 minutes of key services  
Working age people with access to employment by public transport (NI 176) (and other specified modes) DfT DSO  
Children travelling to school – mode of travel usually used (NI 198)  
Per capita CO₂ emissions in the LA are (NI 186) | The section in Policy SP2 covering alternatives to car use will be amended to add a reference to improved provision for cycling. Further changes in relation to cycling will be considered for the submission plan, taking into account the expected publication of the district transport strategy. The ‘open space’ section will be amended to include reference to seeking opportunities through new development to create and extend green corridors with a link to implementation through the allocations DPD and development briefs. Further consideration will be given to the scope for developing green corridors in preparing the submission plan and options for the allocations DPD. |
8.3 SA Statement

Plan or programme proponents should ensure that, when a plan or programme is adopted, the SEA consultation bodies and the public "are informed and the following items are made available to those so informed:

(a) the plan or programme as adopted;

(b) a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report… [and] the opinions expressed [through the consultation]… have been taken into account… and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and

(c) the measures decided concerning monitoring [of the plan]"

(Annex 9(1))

8.3.1 Following the adoption of the DPD, LPAs must prepare an SA statement setting out how sustainability considerations have been integrated in the plan and, more specifically, how the responses to the consultation have been taken into account and the reason for adopting the plan in light of the options considered. This statement can form part of the wider adoption statement. In terms of the consultation responses, the consultation statement submitted with the draft plan will provide a very helpful input since it should set out who was invited to make representations; how they were invited; a summary of the main issues raised by any representations received; and how any representations were taken into account.
Case study: Dover

8.3.2 Following the adoption of the core strategy, Dover District Council prepared a sustainability appraisal and habitats regulations assessment (HRA) statement. The statement sets out:

- how sustainability considerations were integrated into the plan;
- the consultation undertaken as part of the SA and HRA;
- how the opinions expressed through consultation were taken into account;
- the reasons for choosing the plan as adopted, in light of other reasonable alternatives dealt with; and
- the measures for monitoring the plan’s significant environmental effects.
9 Monitoring

9.1 Introduction

“Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action

(Annex 10(1))

9.1.1 PPS12 advises that core strategies must include clear arrangements for monitoring strategy delivery. Monitoring is an integral part of the LDF process and, as monitoring arrangements become progressively more entrenched, the resulting data will assist in promoting a more evidence-based approach to planning; facilitate the assessment of policy effectiveness; and, ultimately, make the planning process more responsive.

9.2 Annual monitoring report

9.2.1 The annual monitoring report (AMR) forms part of the LDF and provides the means to assess, firstly, the implementation of the local development scheme (LDS) and, secondly, the extent to which LDD policies are being successfully implemented.

9.2.2 Government guidance on LDF monitoring proposes three types of indicator for inclusion in AMRs:

- **Contextual indicators** which describe the wider social, environmental and economic background against which LDF policy operates

- **Output indicators** which are used to assess the performance of policies. There are two types of output indicator:
  - **Core output indicators** which must be monitored by all LPAs and provide a consistent data source to inform regional planning
  - **Local output indicators** which should address the outputs of policies not covered by the core output indicators
• **Significant effects indicators** which are used to assess the significant social, environmental and economic effects of policies and should be derived from SA findings

9.2.3 Figure 6 illustrates the relationship between the different types of indicators.

**Figure 6: Annual Monitoring Report indicators**

```
Core Strategy / other DPD policies

Core output indicators

Local output indicators

Regional spatial monitoring

Output indicators

Sustainability Appraisal identifies significant effects

Significant effects indicators

Contextual indicators

Annual Monitoring Report
```

9.3 Links with sustainability appraisal

“The linkages between the AMR and SA are, at best, patchy. In several cases SA and AMR processes are treated as two distinct remits that do not yet overlap with each other. Most authorities, however, recognise the need for greater integration, including selecting indicators which enable a causal link to be established between implementation of the LDF and the ‘significant effects’ being monitored”

Communities and Local Government (2007). Using evidence in spatial planning
9.3.1 Significant effects indicators should be linked to the SA. In identifying and evaluating the effects of a core strategy or other DPD, LPAs may identify ‘significant effects’ which require monitoring. For example, there may be concerns that a new urban extension may give rise to impacts on water resources which are not addressed through the output indicators. With this in mind, an LPA might develop a bespoke indicator to address the issue. Monitoring significant effects should enable a comparison to be made between the effects predicted in the SA and the actual effects measured during policy implementation.

“1. Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.

2. In order to comply with paragraph 1, existing monitoring arrangements may be used if appropriate, with a view to avoiding duplication of monitoring.”

SEA Directive, Article 10

9.3.2 Under the SEA Directive, the significant environmental effects of the DPD must be monitored. The measures envisaged for monitoring – i.e. proposed significant effects indicators - should be set out in the SA report and finalised once the DPD is adopted. Table 14 illustrates the links between significant effects and subsequent monitoring. In some cases, significant effects may be mitigated through particular measures included in the DPD. For example, the anticipated impacts on water resources highlighted in Table 14 may be mitigated through the inclusion of a policy requiring new homes to meet a certain level under the Code for Sustainable Homes. If so, the significant effects indicator could focus on the successful implementation of that policy.
### Table 14: Identifying and monitoring significant effects

<table>
<thead>
<tr>
<th>Significant effects identified in the SA report</th>
<th>Suggested significant effects indicator</th>
<th>Responsibility for monitoring</th>
<th>Frequency of indicator monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in water consumption across the borough in light of new housing and associated development</td>
<td>Number of new dwellings with water efficient measures</td>
<td>Development management department</td>
<td>Information collated on an annual basis for inclusion in the AMR</td>
</tr>
</tbody>
</table>

9.3.3 The SEA Directive specifically requires monitoring to identify unforeseen adverse effects arising from the plan to enable remedial action to be taken. For this reason, LPAs should consider how to react if significant effects indicators reveal any unforeseen adverse effects, or effects which exceed acceptable limits - see Table 15.

### Table 15: Remedyng adverse effects

<table>
<thead>
<tr>
<th>Significant effects indicator</th>
<th>Monitoring outcomes (adverse effects?)</th>
<th>Are these within acceptable limits or is remedial action necessary?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of new dwellings with water efficient measures</td>
<td>Information from development control planners indicates that a relatively small proportion of new dwellings are including adequate water efficiency measures</td>
<td>This will be prioritised in future evaluations of planning applications / discussions with developers</td>
</tr>
</tbody>
</table>
10 Resourcing

10.1 Introduction

10.1.1 This chapter provides advice on resourcing including who should undertake SA and how long it might take.

10.2 Who should undertake SA?

10.2.1 Ideally, SA should be undertaken by a team of at least two to three people since an effective SA will require the identification and evaluation of effects that span the sustainability agenda. The team could be drawn from:

- the pool of officers writing the plan
- officers from other departments within the LPA (for example, transport and environmental health)
- independent consultants

10.2.2 Table 16 sets out advantages and disadvantages of the different approaches to staffing an SA. Whatever approach is selected, senior planners from the LPA must be involved in the SA to ensure that it is successfully integrated into the plan-making process.

10.2.3 One means to ensure that the SA findings can be explicitly taken into account is to request that those undertaking the appraisal provide formal recommendations to which the plan-makers can respond; this response can be recorded together with any subsequent amendments to the emerging plan for the benefit of the audit trail. The provision of recommendations presupposes that the appraisal is undertaken on an independent basis. It might therefore be helpful for an independent team to undertake appraisal at key points in the plan-making process, e.g. at the options and draft plan stages. However, there is no reason why SA cannot be undertaken wholly in house; if it is, plan-makers must be careful to record its influence on the emerging plan.
### Table 16: Different approaches to preparing an SA – advantages and disadvantages

<table>
<thead>
<tr>
<th><strong>Plan team preparing the policy document</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Enables the appraisal to become a fully integrated part of the plan-making process; raises awareness in the team; ensures working knowledge of plan content.</td>
<td></td>
</tr>
<tr>
<td>× May be unable to predict the sustainability impacts of the plan objectively; may not have the knowledge to assess all impacts.</td>
<td></td>
</tr>
<tr>
<td>× Possible lack of objectivity.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Person(s) outside the team</strong> e.g. consultants</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ The policies and their impacts may be viewed more critically.</td>
<td></td>
</tr>
<tr>
<td>× May not have full working knowledge of plan; more difficult to integrate appraisal into plan-making process.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>One person</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Consistent approach and assumptions made in predicting impacts.</td>
<td></td>
</tr>
<tr>
<td>× May be lacking knowledge in some areas and therefore not be comprehensive.</td>
<td></td>
</tr>
<tr>
<td>× There is also the risk of personal bias.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Team of people</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Allows discussion and therefore may have more comprehensive predictions.</td>
<td></td>
</tr>
<tr>
<td>✓ A more balanced, consensus view can be reached.</td>
<td></td>
</tr>
<tr>
<td>× May lead to inconsistencies in judgements; will take longer due to need for extra discussion time.</td>
<td></td>
</tr>
</tbody>
</table>

**Source:** Adapted from Bedfordshire County Council/RSPB (1996)
“If you do not have the resources within the local authority to undertake the sustainability appraisal of the plan, you may need to consider using a consultant to undertake the work. If this is required, local authorities are encouraged to locate external expertise in-house to help ensure the sustainability appraisal process is as integrated with the plan making process as possible.”

The Plan Making Manual

10.3 How long will it take?

10.3.1 An LPA should commence the SA process at the same time as it begins to prepare the DPD. However, the time taken to complete individual components of the SA process will be influenced by a variety of factors including the number of people involved, their previous experience in undertaking SA and the nature of the tasks. The most time-consuming tasks will be preparing the scoping report and appraising the options and the preferred options. The number of options and preferred options to appraise will be a key factor in forecasting how many staff days will be required. It is useful exercise for an LPA to sketch out the number of days each stage and task in the SA process is likely to take. This will enable the LPA to plan for the requisite amount of time and will be invaluable if consultants are to be commissioned to undertake the work. It is worth pointing out that if SA is started too late in the process (for example after preferred options have been identified), LPAs will incur all of the costs in terms of staff time or consultants’ fees but obtain none of the potential benefits.
11 Further information sources

References


**Resources and further reading**

**The Plan Making Manual**

The Plan Making Manual accompanies the revised Planning Policy Statement 12. It has been produced by Communities and Local Government and delivered via the Planning Advisory Service website. The manual brings together council experience, useful advice and guidance in producing local development frameworks.

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