COMPARING THE QUALITY OF SUSTAINABILITY APPRAISAL REPORTS PROVIDED IN-HOUSE BY LOCAL AUTHORITIES AND BY THEIR CONSULTANTS.

BY

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A thesis presented in part-fulfilment of the degree of Masters of Sciences in accordance with the regulations of the University of East Anglia

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ABSTRACT

Sustainability appraisal as an assessment tool sets as a means of improving sustainable development. In England it is a requirement for Local Authorities to carry out an appraisal on plans that are likely to have significant effects on the environment. When they lack the resources or skills to carry out the appraisal, they consult external bodies (consultants). This dissertation aimed to compare the quality and effectiveness of reports produced by Local Authorities and their external consultants. The process was explored using a quality assurance checklist developed from three review packages to check the quality of reports and, separate criteria for exploring effectiveness of the process. Three regions of England were explored to get the core strategy reports produced by Local Authorities and Consultants. The findings suggest that Local Authorities have a better quality of reports than consultants, who might not be passionate about the appraisal process, lack expertise, not motivated and given limited time to carry out the appraisal. They tend to produce low quality reports. The findings for effectiveness suggest that changes were made to some core strategy reports by both authors by textual changes highlighted in the reports. Other reports had changes, but were not highlighted while, some of the reports specified that no changes were made to their core strategy. The research also considers this as a waste of time conducting an appraisal with no effect on the plan and decision making. The reports of the Local Authorities and Consultants are therefore considered ineffective. It is therefore recommended that the appraisal process should be performed by only Local Authorities but if the consultants must be included, changes to policy should be made in order, to provide guidance on how to undertake an appraisal process and, produce effective reports that would aid decision making.
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<td>Office of the Deputy Prime Minister</td>
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<td>SS</td>
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CHAPTER ONE: INTRODUCTION

1.1 Introduction

In Britain, Town Planning is a process that deals with the allocation of land use and deciding on development proposals. The Town Planning System is quite similar to land use management and control common in other countries but is distinctive due to its focus on reconciling economic development and the environment, and the tradition for local authority control. Planning is a devolved matter that is dealt with by the lower levels of government. The planning hierarchy consist of three levels: National; Regional and Local level. Firstly, the National level is the main level to which all subordinate levels have to comply. It produces the Planning Policy Statements (PPS) replacing Planning Policy Guidance (PPG) and guidance notes. Secondly, the regional level produces the Regional Spatial Strategy (RSS) that describe what should happen in a region over the next 10-15 years (but has been abolished). Lastly, Local level planning is determined by Local Development Frameworks (LDFs) drawn up by the Local Planning Authorities (LPAs) within a specific area and they must comply with the regional and national level policy. The same applies to the development controls which are applied by the plan.

A critical mechanism for balancing environmental with economic objectives in land use planning is Environmental Assessment (EA). Two types of approaches are employed at the local level, Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA)/Sustainability Appraisal (SA). EIA has been developed throughout the 1970s and 1980s and was extended in 1999 (DETR, 1999) to analyse the potential impacts of projects like road and industrial developments on the environment and how they can be offset. It requires developers to submit an Environmental Impact Statement (EIS) when applying for planning permission for qualifying projects. Due to its limitations of focusing on specific projects and cannot provide a strategic direction to planning, the SEA Directive was introduced by the European Union, as a mandatory process applied to the higher strategic level of plans and programmes that are likely to have significant effect on the environment, in areas such as land use, transport, waste, energy and water management (Counsell & Haughton, 2006; Klaus et al, 2004; Short et al., 2004). SEA considers only environmental aspects as well but was able to cover most of the limitations of EIA and was applied to certain Plans and Programme. Shortly after its implementation draft guidance was issued by the government on
incorporating SEA into the broader process of Sustainability Appraisal (SA) that was advocated by the central government in the late 1990s as a means of assessing both Regional Planning Guidance (RPG) and Regional Economic Strategies [RES].

Sustainability Appraisal as a tool reviews the economic, social and environmental sustainability of the plan (DCLG, 2008) was subsequently adopted by those preparing development plans, regional housing strategies, regional waste strategies and others (Counsell & Haughton, 2006) and by the government initially for RSS (now abolished by the new government) and LDFs (DCLG, 2008). The RPG was subsumed into RSS in 2004. The aim of the Regional document was to provide a strategic framework for the development of policies in the structure and local plans. The system has been revised three times from 1990s in order to ensure a transparent process, involving stakeholders and subjecting contested matters in the draft documents to a formal public examination before a panel of inspectors. The final stage of the revision requires RPG to undertake SA, plus detailed guidance on how this should be carried out (DETR, 2000a).

The main purpose of SA, in theory, is to ensure local development planning integrates Sustainable Development (SD) (Smith & Sheat, 2001ab; Short et al., 2004 & Benson & Jordan, 2004) into decision-making, influencing it at all stages (DETR, 2000b, DCLG,2008) but in practice it fails to (Therivel et al., 2009). SD is defined as development that meets the needs of present without affecting the ability of future generation in meeting their own needs (WCED, 1987:8). In terms of sustainability, SD must cover all three aspects of sustainability which are the environmental, social and economic aspect that determines ‘weak’ and ‘strong’ sustainability.

‘Weak’ sustainability (WS) focuses primarily on the aggregate stock of capital, including reproducible, environmental, human and social assets. This implies that sustainability is primarily a matter of enhancing aggregate capital productivity, in the belief that development can proceed by offsetting losses in other types of capital, as long as more sustainable practices are introduced to minimise inappropriate losses (Jackson, 2007). In contrast to this is ‘Strong’ sustainability (SS), it questions the degree of substitution between environmental assets and alternative forms of capital, pointing to the need to preserve at all costs the essential life-supporting systems of the biosphere (Neuymayer, 1999). The UK sustainable development framework initially identified four goals: social progress, which recognizes the needs of every
one; effective protection of the environment; prudent use of natural resources; and high and stable levels of economic growth and employment (DETR, 1999) but was revised in 2005 to promote: living within environmental limits and ensuring a strong, healthy and just society through the application of strong science, good governance and economic sustainability (HMG, 2005:17). The former framework was considered a realistic conception of sustainability, while the latter seems to be too naïve (Jackson, 2007). In contrast to this, Agyeman & Evans argues that the former framework seems dominant while the latter is the best choice that looks holistically at the human condition, rather than a piecemeal policy solution to humanity’s greatest problems (Agyeman & Evans, 2004).

England has been actively working on legal and stationary requirements to introduce SA. The “Planning and Compulsory Purchase Act” was set in 2004 and it has changed the English Planning System by introducing SA. It is a mandatory process and According to section 39 of the Act it requires Regional Planning Bodies (RPBs) and Local Planning Authorities (LPAs) to produce a SA report of their planning documents in order to incorporate sustainability objectives with equal value. It integrates these sustainability concerns at both regional and local level. At the regional level the RPBs produces the RSS, while at the local Level the LPA produces new or revised Development Plan Documents (DPDs) and Spatial Planning Documents (SPDs) (DCLG, 2008). The RSS has now been abolished by the new government leaving all duties to LPAs.

Despite these legal requirements, problems remain with SA in practice. It has been considered as a process that may have helped identify areas of potential conflicts and place them in political arena, but has not developed as a ‘neutral’, ‘scientific’ or more ‘objective’ technique that necessarily appears to have made things any easier for the political process (Counsell & Haughton, 2006). Questions have been raised over the effectiveness or quality of SA/SEA (Bond & Morrison-Saunders, 2009; Therivel et al., 2009, Fischer, 2010), which in turn can impact the sustainability of approaches. It could be argued that ineffective appraisal helps promote a particularly ‘weak’ conception of sustainable development through failing to adequately consider sustainability objectives, although more research is needed. Another intervening factor, under-explored in the current literature, is who conducts appraisals and how this affects outcomes. For example, many SAs are increasingly sub-contracted to external consultants who, unlike planners, may not have direct interest in the planning process thereby utilising the technique in ways which suits their particular purpose. They might as
well want to impress the plan authors by making few changes and giving some suggestions (Therivel et al., 2009) thus deny the process the much needed impartiality. Another factor might be that consultants produce less effective appraisal than planners due to cost and time constraints and this is influencing the ability of appraisals to embed sustainable development.

Given the lack of discussion of this issue in the current EA literature, this dissertation therefore aims to compare what Local Authorities (in-house) and external Consultants actually consider sustainable and whether SA is leading towards stronger sustainability rather than weaker interpretations. It will meet this aim by addressing several objectives to see if the Local Authorities or Consultants have a better approach to sustainability appraisal and also if changes are made to policy due to the assessment. The focus of the dissertation is on three contrasting regions of England namely: East of England, London and South East. A sample of local authority SAs will be selected randomly from these regions and used in the analysis.

1.2 Outline to subsequent chapters
Chapter one provides a brief overview about the research through to chapter two which explains in details the framework of the research and how to develop an appropriate method for comparison. Then the third chapter outlines and justifies the method used to compare quality and effectiveness of SA reports produced by Local Authorities and Consultants thereby discussing Result in chapter four. Conclusion follows in chapter five to check how objectives and aims are effectively addressed and recommendations made for further research and improvements. Appendices would follow after the conclusion to give details of the methodology and results.
CHAPTER TWO: BACKGROUND AND LEGAL CONTEXT

2.1 Sustainable Development or Sustainability

Sustainable Development (SD) is without doubt important in land use planning at EU to Local levels. The UK government has been one of the most enthusiastic proponents of SD since the Rio Earth Summit in 1992. It has ensured that SD is given due considerations wherever possible but SD is a term that, to date, still remains vague to the planning profession and in practice it is subject to widely varying interpretations and within government. It is possible to argue that different departments have tended to prioritise specific aspects of sustainability agenda over others (Counsell & Haughton, 2006). This arguably might be one of the greatest challenges for societies in the near and long term future (Schaefer, 2007).

The WCED (World Commission on Environment and Development) (Brundtland Commission) defined SD as

“…development that meets the needs of the present without compromising the ability of future generations to meet their own needs” (WCED, 1987:8).

In essence what the Brundtland Commission has clearly pointed out is the dynamic tension between poverty and environmental concern embodied within sustainable development (Robinson, 2004). This definition has not just failed to provide a common ground, but also highlights a clash of interest between the present and future generations. This successful agenda setting report is focused on perceived dilemma between growth and environment aimed at ensuring sustainable development (McNeill, 2000).

So many definitions of SD are being attempted and more even cited (Hjorth & Bhageri, 2005). But despite all the attempts in literature to develop an all encompassing definition, its meaning still tends to be contradictory and elusive, “some see it as an overused oxymoron, some as a useful or even an inspiring concept” (Lyytimaki & Rosenstrom, 2008:302). While government and private sectors organisations have tended to adopt the term sustainable development, academics and Non-Governmental Organisations (NGOs) have been more prone to use the term sustainability in a similar context (Robinson, 2004).
Although the Brundtland definition seems feasible as a basis for decision-making there are some critics (Neumayer, 1999), researchers see it as being vague, hypocritical and delusional (Robinson, 2004). There are also different views of sustainability or SD which has led to a confusion of definitions (Glavic & Lukman, 2007).

The UK Government set out four objectives in ‘A Better Quality of Life’ in 1999 – A Strategy for Sustainable Development in the UK (DETR, 1999). Although, it has been updated in 2005 following the publication of the new UK strategy for Sustainable Development ‘Securing the Future’ produced in conjunction with the UK shared strategy framework ‘One Future-different paths’, it still stresses the fact that a better quality of life should be ensured now and for future generations. The following shared principle has been agreed upon by different governments in order to achieve sustainable development (HM Government, 2005:17) and it replaces the old four principles. These are:

- “Living within environment limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance; and
- Using sound science responsibly”.

2.1.1 Classification of Sustainability

Sustainability can be classified as either ‘Weak’ or ‘Strong’ (Turner, 1993; Holland, 1997; Neumayer 2003; Karlsson et al., 2007). Classifications have also been suggested which are based upon what economist term natural capital. These according to Holland (1997); Karlsson et al. (2007); Neumayer (2007) & Turner (1993) highlight the multiple and various services of nature benefiting human beings from natural resources to environmental amenities.

Weak Sustainability (WS) is embodied within Strong Sustainability (SS) with more requirements (Neumayer, 2003). Cabeza Gutes (1996) defines SS in terms of natural capital (called critical natural capital), providing functions which are not sustainable by man-made capital. This implies that the amount of natural capital set aside for future generations must not be lesser than that which is enjoyed by the current generation. WS reflects a view whereby natural and man-made capital together comprise total capital, but in this case natural capital is substitutable for human-made capital and therefore the level of total capital passed
onto future generation does not decrease in value (Bond, 2009). Although there are different interpretations from various classification by different researchers, the main question is what does SA aim to achieve, Weak or Strong sustainability?

2.2 Strategic Environmental Assessment (SEA) Directive

Due to the new joint Government in England there are changes that are being implemented to its planning system. Formerly, it was a requirement for Regional Planning Bodies (RPBs) and Local Planning Authorities (LPAs) or Local Authorities (LAs) to comply with the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (SEA Directive) when preparing Regional Spatial Strategy (RSS) revision or new and revised Development Plan Documents (DPDs) and Spatial Planning Documents (SPDs). However, the new government have just abolished the RPBs and RSS in England, leaving all the decision making process to the Local Authorities.

The SEA Directive was introduced into the UK through the European Union Directive 2001/42/EC and is transposed in England and Wales by the Environmental Assessment of Plans and Programmes Regulations 2004 (DCLG, 2008) and in Scotland by the Environmental Assessment (Scotland) Act 2005.

It is a requirement of the SEA Directive for the authorities in charge to carry out Environmental Assessment (EA) and prepare an Environmental Report (ER) which assesses the effects of the plans and programme that are likely to have significant effects on the environment before adoption, ensuring the consultation of environmental authorities and public thereby combining the results in the preparation process before an adoption is made. This meets the objectives of the Directive “to provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development” (European Parliament and Council of the European Union, 2001:5).

2.3 The Planning System in England-The Act

The English planning system was reformed by the Planning and Compulsory Purchase Act 2004 (United Kingdom Parliament, 2004) by making new provision for spatial development and town and country planning but has been recently changed due to the new Government
system in England. This has led to the abolishment of the RPB who no longer have any involvement with the planning system concerning decision making.

The Act requires planning authorities in England and Wales to conduct SA of their spatial plans which express the authorities’ policies regarding land use and development in their area, amongst other things, and as part of the obligations to fulfil SEA requirements (Bond & Morrison-Saunders, 2009 & Jackson, 2007). It is the permission of the authorities to grant a project, and it is based on two levels of spatial planning: RSS and LDF. But for the sake of this research the RSS would be briefly discussed because the research is based on the LDF key document which is the core strategy.

2.3.1 Local Development Framework (LDF)

The LDF explain different aspect of the English national policies and it was introduced by Planning Policy Statement 12 (PPS12). The RSS which covered the whole region was produced in draft by the regional assemblies but has been abolished. However, they will still be considered in this project because all the plans and programmes investigated in this research were developed under the old policy and they comply with RSS. The DPDs is produced by the LPAs within the LDF while in London the Mayor produces the Spatial Development Strategy (SDS) - “the London plan” (DCLG, 2008: 10).
Figure 2.1 The Local Development Framework (NCC, 2005).

The RSS provided the overall spatial vision for the entire region, identifying the broad locations for growth, often by identification of sub-regions, and major infrastructure requirement, together with the housing numbers to be provided for in Local Development Documents (LDDs). The RSS was a product of effective engagement with LPAs and others; therefore it provided the regional framework against which local participation in creating sustainable community strategies and core strategies took place (DCLG, 2008). It involved the development of objectives which were being tested by indicators to check if strategic options achieved the objectives.

LDFs are folders of documents or portfolios of LDDs that outline the Spatial Planning Strategy (SPS) for Local Area, one for each of the 387 English LAs. The LDF consists of
Development Plans Documents (DPDs); Supplementary Planning Document (SPDs); Statement of Community Involvement (SCI); Local Development Scheme (LDS); Annual Monitoring Report (AMR); Adopted proposal maps; and Local development orders (LDO). The DPDs are the statutory part of the LDF and set out site specific allocation and policies amongst others. The SPDs which usually undergo SA was changed by the planning Act in 2008. The new Act requires that SPDs must undergo a screening process in order to determine if they are likely to have any significant effect on the environment before undertaking the SA process, otherwise no SA is required and thus not statutory.

The LDF encompasses the following DPDs that undergoes SA (DCLG, 2008)

- Development Plan Documents
  - Core Strategy
  - Area Action Plans
  - Site Specific Allocation and policies

The DPDs are subject to independent examination and have the status of development plans. They form the relevant development plan for the area together with, previously, the relevant RSS (DCLG, 2008).

2.3.2 The Core Strategy

This research focuses on the Core strategy of SA/SEA which is the principal DPDs and key plan within the LDF. It is a guide to where long term investment infrastructure should be made and therefore sets out the general spatial vision and objectives for delivery. It is the only common DPD within all regions therefore this research would focus on the core strategy sustainability appraisal reports.

This core strategy is developed by looking at different ways that could lead to the achievement of spatial objectives set out in a sustainable community strategy, developed by the collaboration of local stakeholders, appraising these options and consulting the public on them. When all this has been achieved the document will include:

- An overall vision which sets out how the area and places within it should develop
- Strategic objectives for the area focusing on the key issues to be addressed,
- A delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram and
- Clear arrangement for managing and monitoring the delivery of the strategy.

An analysis of the characteristics of the area, its constituent parts and key issues and challenges facing them should be informed in the vision and previously it had to be in general conformity with the RSS and clearly relate to any sustainable community strategy for the area. In essence it is also essential for the core strategy to make clear spatial choices about where developments should go in broad terms in order to reduce the work involved in the preparation of any subsequent DPDs. This will also enhance easier decision on planning applications. It must also be justifiable that is it must be founded on a robust and credible evidence base, and be the most appropriate strategy when considered against the reasonable alternatives (DCLG, 2008).

According to the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and that of Planning and Compulsory purchase Act 2004, the core strategy as well as some other LDF documents, and former RSS must undergo SEA and SA. But in terms of comparison the SA process is considered vaguer than that of the SEA (Therivel et al., 2009). The LPAs must carry out the appraisal process of the core strategy and prepare an end report of its findings (Regulations 19.5) which is the SA report.

Initially the preparation of the core strategy involves three stages before its adoption: issues and options stage; preferred option and submission core strategy stage. In between each stage the core strategy is accompanied by an SA/SEA report that is published, consulted on and then the final submission core strategy is submitted to the secretary of state for examination by an independent inspector in order to determine whether it has been legally prepared and is sound (DCLG, 2008). But the process has been replaced in mid-2008 by a ‘Regulation 25 process’ that requires only three statutory bodies to be consulted on the scope of the SA/SEA. It is followed by an easier plan preparation process that no more requires the publication and assessment of options reports, but requires a stage of publication and consultation on the draft plan and SA/SEA (Therivel et al., 2009). Therefore this research focuses on core strategies
that are either in their submission stage or has been adopted by the secretary of state in other to ensure that their full impacts are determined.

Research suggest that, the core strategy is helping to achieve social and economic objectives and mildly positive and negative effects on achieving environmental objective this in terms shows that core strategy are not becoming more environmentally sustainable overtime (Therivel et al, 2009). This could be considered as WS.

2.3.3 Sustainability Appraisal

SA became a Legal requirement in England in 2004 through the Planning and compulsory purchase Act 2004 (hereafter referred to as the ‘Act’) (United Kingdom Parliament Act, 2004) but was amended in 2008. It was mandatory for RSS revision and is still mandatory for new or revised DPDs and some SPDs (that might require SA after undertaking the screening process and proven to likely have significant effects on the environment).

The former Department of Environment, Transport and the Regions had their definition f SA as:

“a systematic and iterative process undertaken during the preparation of a plan or strategy, which identifies and reports on the extent to which the implementation of the plan or strategy would achieve the environmental, economic and social objectives by which sustainable development can be defined, in order that the performance of the strategy and policies is improved” (DETR, 2000:2.1).

However, the Revised UK PPS12 defines SA as “an appraisal of the economic, social and environmental sustainability of the plan” (DCLG, 2008). This definition has still not proven in practice that the SA process considers the three aspect of sustainability equally without bias. Within the PPS12, SA is linked to the Sustainable Communities Strategy (SCS), where the current emphasis on sustainable development now lies. This would not apply to this dissertation because the reports analysed from LAs and consultants were selected randomly and therefore some have used the older version of PPS12, therefore the definition is to some extent different since some core strategies were produced before the SCS was implemented. However, all government definitions are based on weak sustainability principles, as a result of
the inclusion of economic values and omitting to define what ‘best option’ really means (ODPM, 2005; DCLG, 2006).

Figure 2.2 Sustainability Appraisal in LDDs adapted from ODPM (2005:38)
The SA process shown in figure 2.2 describes the new stages undertaken in order to prepare an SA report as revised by DCLG (2008). Some reports used for this research were already produced before the SA process was revised thereby using the old process of SA. Therefore this process was considered for some reports analysed in this research because they were produced after the implementation of ‘Regulation 25 process’. This guidance method was set out by the government in order to avoid duplication and at same time meet the obligations of SEA Directive (ODPM, 2005).

The Act in section 39 also requires that the persons or bodies in control of the preparation of the RSS and LDDs must aim their function towards the achievement of sustainable development. It also establishes that SA must incorporate the requirements of the SEA Directive thereby including the environmental report produced in the SEA directive in an assessment report on the wider effects of the plan or programme, like the SA report (ODPM, 2005). However, research in practice suggests that SA/SEA of English core strategies and probably other DPDs are not acting to this requirement, confirming SA/SEA findings that most core strategies are likely to have neutral or negative environmental effects. These negative environmental impacts of the core strategies are unlikely to be fully offset by other plans, leading to cumulative impacts. It also highlights the fact that SA/SEA are partly promoting sustainable development in that they are supporting socially and economically beneficial core strategies and helping them to become less environmentally harmful. This is in addition to limiting the value of one of the components of SD which is ‘living within environmental limits’. It implies that the SA/SEA process does not identify what this limits are not, nor testing core strategies against them (Therivel et al., 2009).

Due to the fact that there is no policy in place on how the SA report should be structured, but there are guidance on information that should be present in the report, this makes it not quiet effective in terms of the quality of reports. This might encourage key actors who are not passionate about the process to shape, contest and selectively utilise the techniques in ways which suit their particular purpose thus denying its fairness. The SA process must be in compliance with the RSS and also the Core Strategy must consider other areas of the DPDs as shown in Figure 2.3 below in order to ensure effectiveness. This therefore brings us to the question of how each party would present their reports, if the necessary information is presented and how it can be understood by even non experts.
Unlike SEA, SA functions to “promote sustainable development through the integration of social, economic and environmental considerations when preparing RSS and new or revised DPDs and SPDs (ODPM, 2005:13). SA and SEA have been integrated in England and are both legally required, have similarities and areas of overlap. This joint process is being promoted by government guidance (ODPM, 2005) and the reason for integration was to achieve a balanced integration of all aspects of sustainable development in decision making but in practice this does not happen (Therivel et al., 2009).

SA has a similar element to many other forms of sustainability assessment elsewhere. Its goals may be viewed differently as sustainable development means different things to different people and institutions. According to Therivel (2009), the assessment requires knowledge of the planning system, local area, political factors and broad sustainability considerations, but how sure are we that those conducting the SA possess these skills?
SA is considered as an objectives-driven process, accompanied by the need to derive the aspirational objectives relevant for each plan while identifying relevant targets and indicators that can be used to assess the performance of the alternatives (Bond & Morrison-Saunders, 2009).

2.3.4 Target Objectives and Indicators

The first evaluation tool used on the developing state of the environment, appropriateness of policy measures and in measurement of alternative success is the target and indicators (Niemeijer & De Groot, 2008; Haughton et al., 2009). Although ‘the SEA directive does not specifically require the use of objectives or indicators, they are a recognised way in which environmental effects can be described, analysed and compared’ (DfT, 2004:13). The concept of SA revolves around setting sustainability objectives that set out the aspirations for stakeholders for a given area in England. The objective are statements of what the plan aims to achieve and it involves the use of expert judgement, usually that of the planning officers and or their consultants to test how well the plan achieves the SA objectives (Bond & Morrison-Saunders, 2009) this might be subject to bias.

The indicators are the key components of any sustainability assessment. The European Environmental Agency (2005:162) defines an indicator as “a measure, generally quantitative, that can be used to illustrate and communicate complex phenomena simply, including trends and progress overtime”. These indicators are used at the national, regional and local level as a common assessment tool (Bockstaller & Gradin, 2003). There is an ever increasing requirement for indicators that allow for informed decisions regarding policies, programmes, plans and projects (Lyytimaki & Rosenstrom, 2008). These indicators are associated with each of the objectives, and targets set to ensure that any intervention (such as a new development or land use plan) moves in the right direction. This is done in other to determine the current state of sustainability (Bond & Morrison-Saunders, 2009). Based on the latest scientific literature and government policy guidance, it is required that these indicators should be measurable and also provide a comprehensive basis for decision making. This should be an important part of the SA process, but in practice is this really applicable to the conductors of the SA process and is it the basis for decision making?
2.3.5 Local Authorities and Consultants

Local Authorities (LAs) are also known as the regulators and consist of district, county and unitary authorities who act as filters to the plans proposed (Glasson et al., 2005). They have been on the planning process for over 100 years plus by shaping their communities. However, whereas at one time they would solve problems and provide services themselves, today they are much more likely to discharge their place shaping role through partnership with the public, private and voluntary sectors within areas, neighbouring authorities and with the direct input of their local communities. Using separate bodies to undertake the full SA process might be discouraged however independent input and expertise from outside sources may be appropriate.

The Act requires an authority to produce a full SA report for all LDDs including some SPDs (that are determined to likely have significant effects after been screened). The LPA is responsible for determining these effects by going through the normal scoping stage and giving reasons for their decision, while ensuring that the SA report complies with the SEA Directive, the Act and the Regulations. They have a key role in leading their communities, creating prosperity in villages, towns, cities, and fostering local identity and civic pride. In order to achieve this they have to comply with the secretary of state policies and guidance in preparing LDFs and also national planning policy (ODPM, 2005).

SA is officially conducted by LPAs, when they lack the resources or expertise within them they consider using consultants to undertake the appraisal. The consultants’ acts as facilitators that participate in the planning and development process (Glasson et al., 2005). If this is required LPAs are encouraged to locate external expertise to help ensure the sustainability appraisal process is as integrated within the plan making process as possible, but how effective is this? Differences might exist in the specialization of the local authorities’ officers and their consultants (ODPM, 2005). Some LPAs who are involved in the planning process might also be involved in the decision process, in order for their plans to be adopted with little obstruction thereby denying the process the much needed impartiality.

Some of the most useful inputs to project decision making are comments by statutory consultees, who have accumulated a wide range of knowledge about environmental conditions in various parts of the country. Their role is to give valuable feedback on the
appropriateness of a project and its likely impacts but in practice do they really give valuable feedbacks? Finding of Therivel et al. (2009) suggests that consultants might also be biased in their judgements, rather than giving hard-hitting criticism (valuable feedbacks) they might want to give feedbacks of mostly praises and few suggestions for change. This implies therefore that projects should be appraised only by those who have viable knowledge about environmental and sustainability issues as well (Wood & Jones, 1997 & Wende, 2002) in order to produce good quality reports.

2.4 Quality of Reports and Effectiveness of Appraisal Processes

Although quality and effectiveness might be related they are never the same. Quality is a measure to check how effective a process might be; an example of this might be to check an EIS quality to measure how effective in practice the EIA process is or check an SA report quality to measure how effective in practice the SA process is. Quality assessment of written reports covers only procedural aspects of SA/SEA process and the effectiveness shows if the process findings are affecting decision making and this process cannot be evaluated by reviewing written reports only.

The quality of ES and effectiveness of the EA process is also applicable to the quality of SA reports and the effectiveness of the SA/SEA process. They both rely on written documents that represent part of broader processes and quality of reports can be assessed by review packages which are adapted to their own particularities. The report is to provide information on particular issues like:

- Description of the procedure for the production of the plan or programme and the SEA/SA
- Characterisation of the existing environment
- Objectives used for the SEA/SA
- Alternatives
- Consultation
- Assessment of environmental/ sustainability impacts
- Monitoring and follow up
- Decision-making and implementation of the plan
- Presentation
This information is the basis upon which the review criteria are based (IEMA, 2010; Lee & Colley, 1999; Fischer, 2007). Research shows that while some of these aspects are well assessed, others like description of the plan; consideration of alternatives; consultations; assessment of impacts; uncertainties and so on, are not of a satisfactory quality (Fischer, 2010). These reports are supposed to focus on the inputs/process (quality) and outcomes (effectiveness) of the actual impact of the core strategy rather than focusing on one aspect alone. This research determines if both areas are considered in the reports.

In practice a number of issues impair SA effectiveness (Bond & Morrison-Saunders, 2009 & Therivel et al., 2009). Land Use Consultants and the Royal Town Planning Institute (2008:6) identify the following key themes related to SA effectiveness (in improving the delivery of sustainable development outcomes through the spatial planning process):

- Delivery of sustainable outcomes
- Skills and training
- The evidence base
- Effective consultation
- Assessing significance
- Integration with other assessment procedures
- Effective use of SA in decision-making.

Delivery of sustainable outcomes was a theme included because of evidence that SA did not always achieve this (Benson and Jordan, 2004 & Land Use Consultants and The Royal Town Planning Institute, 2008). One reason for this could be that the tool is simply not working well enough, and that capacity building will resolve this. While another could be that the tool is not always set up to deliver sustainable outcomes (Bond & Morrison-Saunders, 2009). Research shows that although SA/SEA process helped to test whether the core strategy is sustainable, it resulted in few changes to the strategy (Therivel et al., 2009). This research looks at this aspect to see if really changes are made to the core strategy in order to check the effectiveness of the SA process.

There are also concerns about the quality of appraisals being produced. This raises the question about local authorities’ lack of knowledge of environmental and sustainability issues, leading to consideration of consultants alone for the appraisal. Similarly the authorities might be biased producing these reports in-house especially when they are also involved in the planning process and therefore might produce good quality reports to justify their actions.
This consultation process might also enhance effectiveness if given further considerations on effective policy procedures. It might motivate them to produce good quality reports and enhance changes where possible.

Although it is still largely unknown to what extent EIA helps sustainable development (Cashmore et al., 2004) same might apply to SA/SEA. This might be due to negligence on the most important aspect that are being raised but given fewer considerations to findings from the process and under estimating important issues.

In terms of checking the quality of an ES report it is important to consider if the information included are consistent with the process followed. This could also apply to SA reports, therefore checking if it is complete, suitable, understandable, reliable, defensible and actionable. These qualities of the SA reports relate to the effectiveness of the SA process, thus no inference can be drawn about effectiveness from simple assessment of reports.

Short et al. (2004) showed that more than two/thirds of LPAs believed that pre-regulations EA/SA had little or no influence on development plan objectives and policies, this therefore implies that the appraisal made no impact on the plan and therefore a waste of time.

This research therefore intends to review the quality of SA reports by checking quality (input/process) of the reports, to ascertain what constitute reports produced by LPAs and their contractors. There might be other methods to check for effectiveness but this research intends to check the effectiveness of the SA process by noting the changes that are caused by the process to the core strategy and take note of the nature and number of changes due to who undertakes the appraisal.

The review criteria which would be of importance to this study would be a combination of three different packages. They are: Lee et al. (1999) review package for development plans, which is used to assess environmental appraisal in plans or programme level reports; the Fischer (2007) SEA report quality review package and finally the IEMA checklist for reviewing SEAs(undated). This would compare the reports based on some quality measures.
2.5 Objectives

Although it is within the remit of the local authorities to carry out sustainability appraisal and when they lack resources they consult external bodies. The assessment of the quality and effectiveness of these reports will take us to the aim of

- Developing a reliable checklist from the combination of three review package of quality assessment and a criteria for effectiveness;
- Testing the checklist on few reports of both authors from three regions of England to compare quality (input/process) measures;
- Note the effectiveness of the report by assessing the outcomes of the SA/SEA process which is, the nature and amount of changes made to the core strategy as a result of the appraisal and how changes are highlighted in the reports and
- Providing recommendations on improving practice.

Thus leading to the objective of this research to establish if the Local authorities or consultants has a better approach to sustainability appraisal and also if changes can be made to policy due to the assessment.
CHAPTER THREE: METHODOLOGY

This chapter describes the strategy for choosing the method of research. It justifies regions and reports that was selected, and explains the review criteria packages where the QAC used was adapted. Finally, the assessment symbols are explained.

3.1 Approach

In carrying out a comparison approach, a qualitative checklist with grading system could be considered a suitable alternative to examine the fundamental stages of the process. This checklist would help achieve the objectives of the analysis to compare LAs and consultants reports to see who has a better approach to SA process. Although there are other methods that could be applied for the research, but the checklist takes the approach of a systematic review process and it appears to be the most straightforward and influential style and method of review. This provides a systematic rigour to the process and the hope that the reviews can be replicable is enhanced (Fuller, 1999; Morris & Therivel, 2009). The review process provides an insight into how each author presents an SA report and if all pertinent areas are appropriately considered. This was carried out by studying SAs and literature review to determine the most relevant issues that must be considered in undertaking the assessment process. It has been applied by so many researchers and has proven to be a reliable method although with limitations (Bonde & Cherp, 2000; Badr et al. 2004; Fuller, 1999). The checklist was scored using a grading symbol in order to get results that were used for analysis. This also proves to be an easier method for the researcher since the research is being carried out by one person.

3.2 Choosing Regions

In order to investigate the differences between LAs report and that of consultants, regions were selected to ensure proper comparison. Although, there are different methods that could be applied in terms of choosing regions, the researcher did a random selection of regions based on some reasons. Firstly, there are nine relevant regions in England, but due to the nature of the thesis few regions were randomly selected due to time constraints in order to complete the analysis in due time. Three regions were selected from the nine regions of England namely: East of England, London and South East of England. The reason these
regions were chosen randomly was because an analyses of all the regions was made to check the number of local councils in each region. It also checks how development in the different regions affects the nature of plans produced. From the analysis, the selected regions were chosen because they had so many local councils that might have produced an SA report of core strategy, and they were also well developed rural regions.

3.3 Choosing Reports

The website of the three English region selected were consulted in order to establish number of core strategy reports. Research found it difficult navigating for final core strategy reports from the LAs website due to complicated web design, and thus most reports could not be accessible. Obtaining the reports has been an ongoing issue faced by so many researchers, for example, (Therivel et al., 2009, Fischer, 2010) thereby limiting the time frame of reports that can be used. The core strategy reports assessed for the research were those produced after the implementation of the Act from 2004. Core strategies that had progressed to their adoption stage, and whose SA/SEA reports were on the internet were chosen. Overall no region had up to nine of the adopted report. As a result, other reports were selected on the condition that they had reached their final submission stage and are available on the website of LAs.

These set of report were selected on the basis that no further consultation would be made after adoption or submission, and most of their full impacts might have been determined. However, minor changes would be made to the submitted reports or core strategies resulting from the inspector’s comments. These adopted reports were identified, and differentiated based on the adoption statement that was attached to them on the LAs website, but those in their submission stage had no adoption statement.

It was also observed that most reports are prepared by similar consultants but was considered irrelevant for this research because, the reports are from different regions and LAs. The research deliberately considered reports with high geographic spread between LAs and consultants in order to test the hypothesis. Overall fourteen SA/SEAs adopted core strategy, and four (4) SA/SEA submitted core strategies were downloaded and reviewed. Nine SA/SEAs core strategy reports were appraised by LAs, and the remaining nine by the consultants. This thus brings the overall to a total of eighteen (18) SA/SEA reports used in the research to ensure a fair comparison approach.
Table 3.1 SA Reports Analysed (Modified from Therivel *et. al.* 2009)

<table>
<thead>
<tr>
<th>REGIONS</th>
<th>LOCAL AUTHORITY</th>
<th>PLAN VERSION: ADOPTED (A) OR SUBMITTED (S)</th>
<th>DATE OF SA/SEA AND ACTORS (LA) OR (C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EAST OF ENGLAND</td>
<td>Breckland</td>
<td>A</td>
<td>2009/LA</td>
</tr>
<tr>
<td></td>
<td>Castle point</td>
<td>S</td>
<td>2010/C</td>
</tr>
<tr>
<td></td>
<td>Colchester</td>
<td>A</td>
<td>2008/LA</td>
</tr>
<tr>
<td></td>
<td>Huntingdonshire</td>
<td>A</td>
<td>2008/LA</td>
</tr>
<tr>
<td></td>
<td>North Norfolk</td>
<td>A</td>
<td>2008/LA</td>
</tr>
<tr>
<td></td>
<td>Norfolk &amp; Suffolk broads</td>
<td>A</td>
<td>2007/LA</td>
</tr>
<tr>
<td></td>
<td>South Cambridgeshire</td>
<td>A</td>
<td>2006/C</td>
</tr>
<tr>
<td></td>
<td>South end on sea</td>
<td>A</td>
<td>2007/C</td>
</tr>
<tr>
<td></td>
<td>Waveney</td>
<td>A</td>
<td>2009/LA</td>
</tr>
<tr>
<td>LONDON</td>
<td>Kensington and Chelsea</td>
<td>S</td>
<td>2009/C</td>
</tr>
<tr>
<td></td>
<td>Merton</td>
<td>S</td>
<td>2010/LA</td>
</tr>
<tr>
<td></td>
<td>Redbridge</td>
<td>A</td>
<td>2006/LA</td>
</tr>
<tr>
<td></td>
<td>Tower hamlet</td>
<td>S</td>
<td>2009/C</td>
</tr>
<tr>
<td>SOUTH EAST</td>
<td>Ashford</td>
<td>A</td>
<td>2006/C</td>
</tr>
<tr>
<td></td>
<td>Horsham</td>
<td>A</td>
<td>2007*/LA</td>
</tr>
<tr>
<td></td>
<td>Slough</td>
<td>A</td>
<td>2007/C</td>
</tr>
<tr>
<td></td>
<td>Tonbridge &amp; Malling</td>
<td>A</td>
<td>2005/C</td>
</tr>
<tr>
<td></td>
<td>Tunbridge</td>
<td>A</td>
<td>2009/C</td>
</tr>
</tbody>
</table>

*Date inferred from planning documents
Table 3.2 Numbers of SA Reports evaluated by each Consultant

<table>
<thead>
<tr>
<th>Consultants</th>
<th>Number of SA Reports Analysed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Atkins</td>
<td>1</td>
</tr>
<tr>
<td>Baker</td>
<td>2</td>
</tr>
<tr>
<td>Halcrow</td>
<td>1</td>
</tr>
<tr>
<td>Scott Wilson</td>
<td>3</td>
</tr>
<tr>
<td>Waterman Environmental</td>
<td>1</td>
</tr>
<tr>
<td>WSP Environmental</td>
<td>1</td>
</tr>
</tbody>
</table>

3.4 Developing Review Criteria

A criteria based assessment was used for the research to compare quality levels of the eighteen reports. One of the principal sources was the Lee et al.1999 review package proposed to assess the quality of plan level reports on environmental appraisals, which are partly based on the requirements of SEA Directive of the European Union (CEC, 1997). Furthermore, the Fischer (2007) review package was considered in order to pick some salient points to make up the checklist since SEA and SA are integrated as one. Finally, the Institute of Environmental management and assessment (IEMA) SEA environmental report review criteria, which are also, applicable to a review if a plan or programme is acting as a sustainability appraisal (SA) as well as an SEA report. This informed its choice as one of the review packages, therefore, making the overall package three in number where the checklist was being developed. Combining the criteria obtained from the three packages a Quality Assurance Checklist (QAC) was produced, and used as a means of assessing the quality of these reports.
A separate category was created on the QAC, with criteria developed due to findings from literature, to evaluate the effectiveness of the appraisal process in order to note the nature and amount of changes made to the core strategy due to whom undertakes the assessment.

3.4.1 Review Package for Development Plans

This is one of the most widely used review package for quality assessment of environmental reports of land-use and development plans. It was later developed so it could be applied to environmental appraisal reports, but now it is been applied to SA reports in the UK and to SEA in other parts of the Europe (Bonde & Cherp, 2000). The review package consists of a series of “review criteria”, (for example categories and sub-categories) grouped within four “review areas” and organised in a hierarchical structure. Lee et al. (1999) states that the review package can be useful to local authorities when reviewing their draft environmental appraisal report so that any deficiencies identified can be reported and corrected before finalising the report.

Its review criteria are based on a combination of “the provisions of PPG12 (and the associated advice contained in Environmental Appraisals of Development Plans: A Good Practice Guide (DOE, 1993)), requirements specified in the European commission’s proposal for SEA directive relating to land use plans and programmes (CEC, 1997) and a review of the international literature relating to good SEA practice and its underlying methodology (Bonde, 1998a, ch.2).” (Lee et al., 1999: 17-18) (Fonseca, 2006:32). The PPG12 was revised in 1999 in order to broaden the scope of environmental appraisal to cover all aspect of sustainable development, as well as environmental factors. The PPG12 was further replaced in 2004 with the planning Policy Statement 12 (PPS12): LDF which has now been replaced by PPS12: Local Spatial Planning in 2008. It sets out different policies on the different aspect of planning to be applied throughout England.

3.4.2 IEMA Review Criteria Checklist

The Institute of Environmental management and assessment (IEMA) is a non-profit organisation whose principal aim is to promote the goal of sustainable development. It also aims to develop individuals who are interested in the environmental profession (IEMA, 2010).
Their review criteria was developed using a variety of SEA sources, such as the Directive, the Guidance for Planning Authorities by ODPM and also Review criteria on environmental appraisal by Lee et al. (1999). It therefore, can be applied by LAs, consultants or businesses who would like an independent view on the quality of environmental reports of SEA/SAs of a plan or programme. The criteria of this package are split into three sections which are related to the review package for development plans (IEMA, 2010).

3.4.3 SEA Report Review package (Fischer 2007)

This package was also included to indicate any significant points which are omitted in the above packages in order to create an effective checklist to assess the quality of reports. The package was created for teaching purpose but it is now widely used as a method of review. It considers the requirements of the SEA directive, and inclusion of some sustainability questions, as required by English sustainability appraisal regime ODPM (2005). The criteria consist of six sections, which were then, merged with the others.

3.5 Quality Assurance Checklist (QAC) Developed

The quality assurance checklist is the combination of the three review packages mentioned above. Although, there are different arguments about the use of QAC, it is still the best approach to reviewing the quality of appraisal reports. Lee et al. (1999:22) argues that the combined use of an environmental appraisal checklist and review package could be a significant internal instrument of quality control in environmental appraisal within the development plan preparation process.

Also, Bonde & Cherp (2000:102) are of the opinion that “environmental assessments associated with the different stages and levels in the planning process cannot be simply evaluated within a single quality review package”, therefore, a combined checklist from different packages would be the best method to assess the quality of environmental/sustainability reports.

The hierarchical or pyramidal structure proposed by Lee et al. (1999:18) was used for the review, which starts at the lowest level and move upwards to the complex criteria where broader tasks and procedures in the process are until the overall assessment of the environmental appraisal has been completed.
Table 3.3 Assessment Symbol Adapted from Lee et al. (1999)

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Generally well performed, no important task left incomplete.</td>
</tr>
<tr>
<td>B</td>
<td>Generally satisfactory and complete, only minor omissions and inadequacies.</td>
</tr>
<tr>
<td>C</td>
<td>Can be considered just satisfactory, despite omissions and/or inadequacies.</td>
</tr>
<tr>
<td>D</td>
<td>Parts are well attempted but must, as a whole be considered just satisfactory because of omissions or inadequacies.</td>
</tr>
<tr>
<td>E</td>
<td>Not satisfactory, significant omissions or inadequacies.</td>
</tr>
<tr>
<td>F</td>
<td>Very unsatisfactory, important task (s) poorly done or not attempted</td>
</tr>
<tr>
<td>NA</td>
<td>Not applicable. The review topic is not applicable or it is irrelevant in the context of the environmental/sustainability appraisal report*</td>
</tr>
</tbody>
</table>
The study adopted two forms of assessment symbols to assess the quality of reports. Firstly, it used the Lee et al. (1999) assessment symbol to complete the collation sheet, secondly adopted the quality ratings used by (McGrath and Bond, 1997; Badr et al. 2004) for presentation purpose.

A or B – Good.

C or D – Borderline.

E or F – Poor.

In terms of considering satisfactory and non satisfactory reports, the research considered A or B as satisfactory, while C or D and E or F were considered unsatisfactory.

Finally, the added sub-category for assessing effectiveness was a bit difficult to analyse because no research has been carried out on this issue. The researcher had to develop a method that was used to analyse the changes to get results for analysis. A ‘Yes’ or ‘No’ scoring system was used for the criteria, and were graded under sections 1 to 4 below based on the number of YES and NO assigned to each report. With this approach it was easier to identify reports that changes were being made to. The total rate of scores were analysed to see how many reports were under each sections.

The grading sections are:

Changes 1- Indicates more changes made, highlighted in same or different areas within report with reasons given;
Changes 2- Indicates fewer changes made, highlighted in same or different areas within report with reasons given;
Changes 3- Indicates changes made, not properly highlighted and no reasons.
Changes 4- Indicates no change with reasons.

More Changes- This indicates from the report that a large amount of changes were made to the core strategy objectives by amendments to the statement or total removal,
considering consulted opinion. The changes might have being placed in same or different areas within report with reasons.

Fewer Changes- This indicates from the report that few changes were made to the core strategy objectives by amendments to statements or total removal, considering consulted opinion. The changes are either highlighted in same or different areas within report with reasons.

Changes not properly indicated- This indicates in the report that more or fewer changes were made but were not identified nor explained in the report.

No Changes- This indicates in the report that due to the appraisals no changes were made to either core strategy objectives, with reasons justified considering consulted opinion.

The proposed QAC consists of four review areas. These sub-categories presented in the QAC in Appendix 1, should have scores at least “satisfactory”, that is assessed A, B, or C:

- 1.1.3, 1.1.5, 1.1.6, 1.2.2, 1.2.3, 1.3.2, 1.3.3
- 2.1.1, 2.2.1, 2.3.2
- 3.1.4, 3.1.5, 3.1.6, 3.2.1, 3.3.2, 3.3.3, 3.3.5,
- 4.1.1, 4.1.2, 4.4.1, 4.4.2, 4.6.1, 4.6.2, 4.6.3

This is in agreement with Lee et al. (1999) classification of “Satisfactory” sub-categories or “Not applicable” (NA) and reports are likely to comply with the minimum requirements. Therefore, these sub-categories were chosen in order to demonstrate compliance. The results from the review were analysed using a summary results for all reports to ensure it fits into an appropriate analyses chart and make comparison much easier.

3.6 Trial run of method

The trial run method was carried out using four reports, two each from LAs and consultants in order to compare the effectiveness of the checklist on reports. The reports used are those produced by Huntingdonshire, South Cambridgeshire, Horsham and Slough Council.

From the trial process, the checklist was observed to be consistent in some review area, and was not in others. So, it was modified to meet the requirements of the reports to ensure
effective results. Some review areas were replaced because of their inconsistencies. The review category that was added to assess the effectiveness of the appraisal process was also modified, and more points were added in terms of assessing how both authors were able to present the outcomes of the process.

Limitations

The recommendation of the Lee et al. (1999) to use two or more persons for review was not considered for this research due to the nature of research being an independent thesis. This might have led to subjectivity by the researcher. Also, Small samples of core strategies were analysed, which may limit the result of the research due to one researcher and time constraint.
CHAPTER FOUR: RESULT AND DISCUSSION

Results obtained from using the checklist to assess the reports analysed in this research are presented discussing in details the main findings.

This section of the report explains how the objectives of the research to compare the quality (input/process) of reports and the effectiveness of the appraisal process, checking the nature and amount of changes caused to the core strategy by reports produced by LAs and consultants.

Basically the findings in this section would be presented firstly, by summarising the results on the quality assessment of the reports comparing the review areas and review category grades of authors. Secondly, it presents the result for the effectiveness using the review criteria for changes made to the reports by comparing which author had more changes to their reports due to the appraisal. The overall findings are then discussed relative to the literature review, comparing what other research had suggested with the findings of this research. Variations between how quality information and findings of the appraisal process are presented in a comparison graphical presentation for each author.
4.1 Results

4.1.1 Summary Result on the Quality of SA Reports within Review Area

The findings of the review area of the checklist for the SA reports is presented in Table 4.1, with a summary of grades that was assigned for the reports produced by the separate authors. The complete checklist with the review results is presented in appendix 2 and 3 respectively. The grades were considered satisfactory and unsatisfactory. Satisfactory were grades A, B while unsatisfactory was grades C, D (borderline) and E, F (poor). Few reports were considered not to have omissions in some review category and thus were awarded A grades.

<table>
<thead>
<tr>
<th>SUMMARY REVIEW AREA</th>
<th>LOCAL AUTHORITIES</th>
<th>CONSULTANTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NO OF REPORTS</td>
<td>GRADE</td>
</tr>
<tr>
<td>REVIEW AREA 1</td>
<td>7</td>
<td>A/B</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>C/D</td>
</tr>
<tr>
<td>REVIEW AREA 2</td>
<td>6</td>
<td>A/B</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>C/D</td>
</tr>
<tr>
<td>REVIEW AREA 3</td>
<td>7</td>
<td>A/B</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>C/D</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>REVIEW AREA 4</td>
<td>8</td>
<td>A/B</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>C/D</td>
</tr>
</tbody>
</table>

The results are presented per review area showing the number of reports that had satisfactory and unsatisfactory scores per review area thus, showing the variations between each authors.
This result is presented on a graphical presentation as shown in Figure 4.1 below in order to get the clearer picture of the variations.

![Graph showing variations in quality of SA reports within review areas](image)

**FIGURE 4.1 Variations in Quality of SA Reports within Review Areas**

The results obtained from the research did not have much variation but reports of LAs had the highest rate of satisfactory reports per review area than consultants who had the highest rate of unsatisfactory reports. Although almost all the LAs reports were considered satisfactory some were also considered unsatisfactory. This scoring system is used in order to get the summary of the reports since the reports are few in number.

For Review area 1 (description of the plan, baseline environment, affected environment and objectives) LAs had more satisfactory reports than the consultants who had almost all reports...
as unsatisfactory (borderline). Similarly for Review area 2 (identification and evaluation of key impacts) LAs also had more satisfactory reports than the consultants who had higher amount of unsatisfactory reports (4 borderline and 1 poor) and had just four satisfactory reports. Also for Review area 3 (alternatives, mitigation measures, monitoring), LAs had 8 of their 9 reports considered satisfactory for this aspect while consultants had 5 satisfactory reports and the remaining where unsatisfactory (3 borderline and 1 poor). Finally for review area 4 (communication of results), LAs also had 8 reports considered as satisfactory while just one was assessed unsatisfactory and the consultants had just 5 satisfactory reports and the other considered unsatisfactory (3 borderline and 1 poor).

Going through the number of reports, it is clear that LAs had more satisfactory reports per review area than the consultants who had more of unsatisfactory reports. A detailed result of the review category of the checklist is discussed below to create a clearer picture of how this review area grades were considered.

4.1.2 Summary Results on the Quality of SA Reports within Review Categories

Comparing Summary Review Category for Review Area 1

This section compares the quality of the review category that makes up the review area, using the summary of reports produced by either Local Authorities or consultants. Significant variations were noticed when comparing the review categories and it shows the aspects where both authors performed satisfactorily and unsatisfactorily.

From the analysis of review area 1, that consist of categories like description of the plan; baseline condition; the affected environment; and objectives. It was observed that almost all the review topics were considered satisfactory with a few unsatisfactory reports for the LAs compared to consultants who had few satisfactory reports and more unsatisfactory reports.
FIGURE 4.2 Variations in Quality of SA Reports within Review Category 1

Review Category 1.1 (Description of plan)

This involves describing the purpose of the plan, its process in the planning hierarchy, objectives and proposal, identifying related land use and sectoral plan, programme and policies, definition and description of the SA process. From the research it was observed that most reports failed to acknowledge these information especially reports produced by consultants. Although, they might have acknowledged it, they fail to sufficiently explain how their plan set the framework for other activities which was not evident in the report, thus limiting the input and process information. LAs had more considerations to this issue than consultants, thus they had higher amount of satisfactory reports compared to consultants. The LAs are therefore better in this category than consultants.
Review Category 1.2 (Baseline Environment)

This describes the present state of the environment without the plan and how it might be affected by the plan. From the review it was observed that some reports described in details (although, with minor omissions) the baseline environment, and how it might be affected by the plan, future state of the environment without the plan, and the different types of development proposed. It was also observed that most reports had already identified their baseline environment in their scoping report and made reference to where these potentially relevant background documents and data’s could be assessed, while others did not. LAs in this category had higher amount of satisfactory reports compared to consultants who had more unsatisfactory reports. From this category, it is also evident that LAs have more satisfactory reports than consultants.

Review Category 1.3 (Affected Environment)

This explains the extent of the environment that has been predicted to be affected by the plan. The review shows that some reports gave information on existing environment/sustainability issues and also considered wider areas with key assets beyond the physical boundaries of the plan area although with minor omissions, while others especially those produced by the consultants were weak in describing this aspect. This aspect also had LAs with the highest amount of satisfactory reports compared to consultants.

Review Category 1.4 (Objectives)

This describes how the targets might be achieved. It ensures that the process is objectives led and that the objectives should consider areas of sustainable development. From the review it was observed that most reports could not justify their objectives. The LAs had more satisfactory reports in this aspect than consultants.

Overall for each review category it was evident that the LAs established highest rate of satisfactory reports than consultants. This implies therefore, that on Review area 1 the LAs are better than consultants.
Comparing Summary Review Category for Review Area 2

Also for Review Area 2 - identification and evaluation of key impacts (scoping of the environmental appraisal, describing key impacts, assessment of impacts, and appraising sustainability of the plan). It was observed that the local authorities had more satisfactory reports than consultants.

FIGURE 4.3 Variations in Quality of SA Reports within Review Category 2
Review Category 2.1 (Scoping of the environmental appraisal)

This involves explicit and systematic check on policies and impacts to ensure the coverage of all important issues. Information regarding to policies, proposal and their impacts including those of alternatives should be identified, and stated in the report. The LAs had more satisfactory reports because they considered explaining connections of their plans with other level and tiers of decision making, while consultants reported like they know less about the issue.

Review Category 2.2 (Describing key impacts)

This involves describing the likely impacts of the plans policies and proposals including those of its alternatives that were identified from the scoping stage and considering the type of plan and the state in its preparation. Insufficient evaluation of impacts was observed from both authors who failed to explain classification of their impact magnitude and extent; probability; duration; frequency; reversibility of positive and negative impacts; secondary, cumulative and synergistic as well as transboundary impacts. LAs were also better than consultants in this aspect and thus had higher rate of satisfactory reports with omissions and unsatisfactory reports, while consultants had more unsatisfactory reports.

Review Category 2.3 (Assessment of impacts)

This involves assessing the impacts that are deemed significant and should be quantified where appropriate. This impact magnitude should be assessed using criteria like environmental/sustainability quality standards, limit values. Most of the reports did not show how their impact magnitude were identified, and did not consider using limit values were necessary. This aspect was considered a bit poor for LAs and consultants. LAs had almost same rate of satisfactory and unsatisfactory reports, while consultants had more unsatisfactory reports.

Review Category 2.4 (Appraising the sustainability of the plan)

This involves reviewing how sustainability issues were considered in the plan. This should list the sustainability issues that would be considered for the plan, and assess the issues. From the review it was observed that most LAs listed and briefly explained these issues while consultants had little interest in it and thus they had more unsatisfactory reports.
Overall for this review area it was also evident that LAs had the highest rate of satisfactory reports in each review category than consultants. Therefore it can be adjudged that the LAs were better off in Review area 2 than consultants.

**Comparing Summary Review Category for Review Area 3**

Similarly for Review Area 3: alternatives, mitigation measures and monitoring, it was also observed that LAs had more satisfactory reports than their consultants.

![FIGURE 4.4 Variations in Quality of SA Reports within Review Category 3](image)
Review category 3.1 (Alternatives)

This involves information on alternatives to plans policies, proposals and objectives in the plan making process, giving the environmental implications, potential and significance of each of the alternatives considered and reasons for eliminating any. From the review it was highlighted that insufficient consideration of alternatives was prominent between reports of both authors, they failed to describe how alternatives were considered, and effects of various options. Some reports had just two to three options considered which seemed biased. So far, LAs had highest satisfactory reports compared to consultants who had more unsatisfactory reports.

Review Category 3.2 (Mitigation)

This describes measures to prevent, reduce and as fully as possible offset any significant adverse effects on the environment/sustainability issues of implementing the plan. For this aspect LAs and consultants had same rate of satisfactory reports. They listed mitigation measures that would be used to offset their significant adverse effects while other reports were considered unsatisfactory due to insufficient consideration.

Review Category 3.3 (Monitoring)

This describes proposal to monitor and review impacts arising from the plans policies and proposed implementation in order to identify at an early stage unforeseen adverse effects. This monitoring measure must be suggested in order to improve future baseline work and improve accuracy of information on the existing environment/sustainability in an area where gaps or uncertainties may occur. It must also define indicators for monitoring based upon the original baseline information and also make contingency arrangement in response to significant adverse effects. From the review, it was observed that LAs had more sufficient consideration to monitoring than consultants by explaining how it should be done and who would be responsible. Therefore, they had the highest rate of satisfactory reports, while consultants had higher rate of unsatisfactory reports.

Overall, this review area shows that LAs had more satisfactory reports in 2 review category than consultants who had more unsatisfactory reports. They are therefore, considered better in this category than consultants.
Comparing Summary Review Category for Review Area 4

Lastly, for Review Area 4 which is communication of result (presentation, uncertainties, emphasis, consultation, non-technical summary, decision making and implementation of plan), the LAs reports were considered satisfactory while consultants achieved more unsatisfactory scores.

**FIGURE 4.5 Variation in Quality of SA Reports within Review category 4**
**Review Category 4.1 (Presentation)**

This means information should be presented in good quality and manner, in order, to ensure that it can be read and understood by even non-experts. This section was considered the worst section for consultants and best for LAs. Consultants had a very poor presentation style for their input/process and outcomes, thus they were assigned lesser grade. LAs had a good format in presenting their input/process and outcomes in their reports. For this section, the LAs are thus considered better than consultants.

**Review Category 4.2 (Uncertainties)**

This involves acknowledging any limitations and uncertainties encountered in information and assessment methods and how they have been managed during the process. From the review, observations shows that the LAs had a section in their reports showing how these issues were considered, while consultants who cared less had insufficient explanations. Therefore the LAs had the highest rate of satisfactory reports and were considered best in this section.

**Review Category 4.3 (Emphasis)**

This requires that information should be bias free and receive appropriate emphasis to its importance in report context. But from the assessment it was observed that some actors were biased in the consideration of alternatives from their justification. As a result, LAs and consultants had same rate of satisfactory reports that were considered unbiased and same rate of unsatisfactory reports considered biased.

**Review Category 4.4 (consultation)**

This involves showing evidence of the interested parties consulted during the appraisal and if their opinion were given due consideration in the report. From the review it was observed that most consultants failed to list consultees as part of the report, neither explaining how they were contacted. This does not explain the impact of the public involved in the SA process. LAs also had more satisfactory reports in this section than consultants who had highest rate of unsatisfactory reports.
Review Category 4.5 (Non-Technical Summary (NTS))

This is supposed to give a summary of the report its process and findings. From observation it showed that what they actually put forward does not constitute a NTS. Also some reports did not include their NTS in the SA report but was made as a stand alone document. LAs had the highest rate of what constitutes a NTS compared to consultants. They are thus better in this section than consultants.

Review category 4.6 (Decision making and implementation of the plan)

This provides information on the final conclusion reached, which is the outcome of the process. From the review it was observed that information’s on how decisions were made was limited. The report also failed to explain if the opinions of those consulted were considered. LAs had highest satisfactory reports than consultants who had more unsatisfactory reports.

From this review area, it was observed that the LAs had more satisfactory reports than consultants and thus considered best in terms of producing better quality reports. Results would be discussed further in section 4.2.
4.1.3 Summary results on the effectiveness of SA reports

Also for the effectiveness the assessment shows that changes that were caused to the reports were almost the same for both Local Authorities and consultants, with one or two report difference. The way the changes were summarized was an issue for the reports. The table below shows the result of the reports that were classified under each section of changes.

**Table 4.2 Number of Reports in Each Category of Effectiveness**

<table>
<thead>
<tr>
<th>CHANGES</th>
<th>LA No of reports</th>
<th>C No of reports</th>
</tr>
</thead>
<tbody>
<tr>
<td>Changes 1</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Changes 2</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Changes 3</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Changes 4</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

This variation about the effectiveness shows the number of changes that were made to the report considering whom undertakes the appraisal. The difference on this aspect was very slight for both authors. It would be explained in details after the graph below showing variations in effectiveness of the appraisal process between authors.
From the result of the changes, it was observed that the variation between reports of LAs were almost the same with that of consultants. For the 9 reports of the LAs it was observed that at most one of their reports was under each of the classification categories. From the assessment observation shows that consultants had the highest rate of reports that had more changes to their core strategy. LAs also had two reports with more changes to their core strategy. These changes were mostly changes to objective wordings and were highlighted in same or different sections of the reports. Secondly, LAs had more reports with fewer changes than consultants which was also changes in objective wordings and highlighted in same or different regions of the report. Similarly, some reports made changes to their core strategy but insufficient explanations about the changes were given but not highlighted in the reports. LAs had highest number of reports for this section. Finally, one report each from both authors had no changes made to their core strategy and with insufficient explanations, and was thus classified under changes four.

**Figure 4.6 Variations in Effectiveness of SA Process of Reports**
This aspect of effectiveness from the result could be considered less effective considering the number of reports that had more changes to their core strategy.

4.2 Discussion

From the observation, the overall quality of reports shows that LAs have a better way of assessment than consultants. Also, for the effectiveness of reports, the process could be considered a less effective approach because consultants had reports with more changes than the LAs, and the LAs had more reports with fewer changes and changes not identified than consultants. Also, they had same amount of reports with no change.

The manner in which reports were presented by LAs could not be compared to that of consultants. This research had same findings with research of Fischer (2010), concerning the aspects of the assessment process that were insufficiently discussed and this was particular to the consultants. Most LAs reports are well presented giving fuller textual information and explain most judgements compared to consultants. Some LAs who had already conducted part of the appraisal process in the scoping stage gave credit to where potentially relevant information could be assessed. For most consultants, the textual information in their reports was vague and could not justify most of their judgements. Some also skipped giving credits to where relevant information could be assessed if not included in the main report. This could imply that since no policy on how SA reports should be structured some consultants and LAs might not have personal involvement in the SA process. Also, they might tend to define and selectively utilise the approach in ways that suit their particular purpose thereby producing poor quality reports.

In terms of the information that was presented in some reports, it might also be suggested that those conducting the SA process require some skills about the planning system, local area and political factors. They are not experienced enough on how the assessment process works and thereby, produce poor quality reports. Furthermore, it might also be as a result of lack of motivation or obligation on conducting the SA process due to poor ‘resource allocation’. If there is no incentive, there is a tendency for the production of poor quality reports that would have no effect on the assessment practice, which could also be considered as a complete waste of time (Therivel et al. 2009). Similarly the consultants might be given a limited time to carry out an appraisal. This might also affect the quality of reports produced, by rushing through the process in order to meet dead line. The consultants tend to make mostly feedbacks on where
improvements need to be done rather than hard hitting analysis. The feedbacks in most instances might not be considered in decision making.

However, LAs had quite a large amount of standard reports considering all necessary information. This might be due perhaps to the fact that they are also involved in the ‘decision making’ process and would like their plans to be adopted without barrier (Therivel et al. 2009) even when they tend to be biased in their judgements.

For the effectiveness of reports, observation shows that fewer changes resulted in the core strategy (Therivel et al. 2009). The LAs had fewer reports with more changes compared to the consultants who had more reports with changes. The consultants also had 4 credible reports with more changes made and most were changes to objectives wording rather than hard hitting attacks (Therivel et al. 2009). These changes are stated, either in the appendix section or body of the report in a tabular presentation showing how changes were instigated.

Regarding the other criteria aspects, fewer changes are made to the reports and the LAs had more reports in this section than consultants. This might just be because the SA process was not properly executed, or the device is not working well (Bond & Morrison-Saunders, 2009) and thus leading to fewer changes. On the other hand, it might also be as a result of discrimination from both authors in order to avoid obstructing the strategy adoption. These changes were also identified and placed in the appendix unit or main body of the report in a tabular presentation.

For the third aspect, LAs had more reports than consultants on changes that were made to the core strategy but not identified in the report. Therefore, how changes were made could not be ascertained and if opinions of those consulted were given considerations. This might also, result from the lack of practice and policy as to how SA information should be presented, and the authors therefore present their findings of the SA system in ways that suit their particular purpose. They might also lack knowledge of the appraisal process, and makes it to be difficult for them to present their findings thus denying the report it qualities which makes it worthless.

The final criteria had one report each from LAs and consultants with no changes to the core strategy, and it was shown in the main report with reasons. This might also be suggested as a waste of time conducting an assessment that has no effect on the system (Short et al. 2004) and could be considered as a weak concept of SD.
The results of the findings, therefore shows that LAs are better in the appraisal job than their consultants by producing superior quality reports which describes how the assessment process was being carried out although, might be biased. While, the effectiveness of the process shows that reports of both authors could be considered inadequate because the changes that were made were mostly changes in objective wordings and thus was difficult to determine if the changes had any effect in the ‘decision making’ process by just reviewing reports.

The result is being affected by some limitations, for instance, the relatively small sample. The insufficient sample size affected the variations of reports which were not highly significant. Also, reports from same consultants affected the outcome by making the consultants have quite a number of reliable reports that were considered satisfactory but were produced by similar consultant. This happened because like consultants reports were being picked from different regions due to the random selection. Secondly, the researcher did not take detailed notes of the contents of the reports to check if the three requirements of sustainable development must have been considered without prejudice due to limited time of research and also being one reviewer. Thirdly, the grading systems for the reports were based on the general tone of the reports which is subject to discrimination. Finally, the method used to investigate the effectiveness of the assessment process was not highly reliable, and thus the scoring system was a bit subjective. It could not be determined from the review if the changes made to the reports affected the ‘decision making’ process.
CHAPTER FIVE: CONCLUSION AND RECOMMENDATIONS

5.1 CONCLUSION

The overall drive of this research is to examine who has a better approach to SA process, the LAs or consultants. This was achieved by assessing quality and effectiveness of each authors’ reports and provide recommendation on where improvements need to be made.

A method was developed from three review packages to check the quality of 18 reports, 9 each from the Local Authorities and consultants. Another method was developed for the effectiveness, by using 4 criteria topics to analyse the changes made to the core strategy due to the appraisal, which eludes effectiveness. This method so far brought us to the conclusion of the research.

Firstly, from the quality result it was observed that the manner in which the Local Authorities produce SA reports is far better than consultants. The authorities might tend to have more involvement about the appraisal process than the consultants who may care less about the effect of the assessment. Therefore, they might offer a low quality report that sends transient signals of what the plan is all about. This might be as a result of lack of obligations imposed on them on how the process should be explored and report presented. Also, some consultants who have produced poor reports might lack the skills about the appraisal process, and thus produce reports to suit their preference. They might also have limited time to carry out a SA due to limited time frame given to then to complete the appraisal. They might therefore, end up producing poor quality and ineffective reports. On the other hand, the sound quality of reports produced by the authorities might be biased. They might tend to give massive information assuring the reader of compliance to all relevant aspect in order to avoid hindrance to their plan. These issues might be as a result of lack of policy in place as to how an appraisal process should be explored and findings presented.

Secondly, for the effectiveness of the appraisal process can be concluded that the Local Authorities have similar changes to their reports, but the consultants had more reports with more changes than the Local Authorities. Some also had fewer changes; others had changes which were not included in the reports and some reports without changes. This might have occurred in order for the process not to be considered like a waste of time, and thus came up
with what could be considered as changes. It might also have resulted, due to lack of policy as to how the process and findings should be presented and thus the authors care less if changes are made to the core strategy or not. Therefore, when an appraisal has not effect on the process it could constitute a weak concept of sustainable development.

5.2 Recommendations for Research

This research therefore, concludes with some recommendation for further research and change in policy.

Another research should be performed to look into details the contents of the reports. This would determine if the local authorities and consultants’ reports are promoting ‘weak’ or ‘strong’ concept of sustainability.

A larger geographical sample should be analysed to show significant variations and also assess reports from different consultants each to see the weaknesses between their different reports, because the best reports from this research were produced by similar consultants but different regions.

Local Authorities should improve the navigability and transparency of their website to ensure easy access.

A more accurate method should be developed to examine if the effectiveness of the reports affects decision ‘making process’. This would help determine if the changes made to the core strategy are not biased to economic and social factors, sidelining the environmental aspect.

As a result of these findings, a suggestion would be the revision of policy, to allow the LAs take complete control of the appraisal process rather than involving the consultants who might tend to care less about the process.

Also if, the consultants must be considered in the appraisal process, government should establish guidance and obligations. This would guide them understanding the appraisal process and deliver compelling reports.
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APPENDICES

APPENDIX 1: QUALITY ASSURANCE CHECKLIST DEVELOPED

<table>
<thead>
<tr>
<th></th>
<th>DESCRIPTION OF THE PLAN, THE AFFECTED ENVIRONMENT AND THE BASELINE CONDITIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td><strong>DESCRIPTION OF THE PLAN:</strong> This involves describing the purpose of the plan, its process in the planning hierarchy and its objectives and proposal.</td>
</tr>
<tr>
<td>1.1</td>
<td>Is the contents and main objective of the plan with a regulation which underpins the document described?</td>
</tr>
<tr>
<td>1.1.1</td>
<td>Are related land use and sectoral plan and programmes and policies identified and explained?</td>
</tr>
<tr>
<td>1.1.3*</td>
<td>Is the general process for the development of the plan, the SEA/SA and their interaction been described?</td>
</tr>
<tr>
<td>1.1.4</td>
<td>Are information on environment/sustainability objectives established at international, European or UK level, which are relevant to the plan described?</td>
</tr>
<tr>
<td>1.1.5*</td>
<td>Are the environment/sustainability information been taken into consideration during plan preparation?</td>
</tr>
<tr>
<td>1.1.6*</td>
<td>Is sustainability defined?</td>
</tr>
<tr>
<td>1.2</td>
<td><strong>THE BASELINE ENVIRONMENT:</strong> This describes the present state of the environment without the plan and how plan would affect the environment.</td>
</tr>
<tr>
<td>1.2.1</td>
<td>Is the existing state of the environment described with the baseline level provided especially for potentially sensitive areas?</td>
</tr>
<tr>
<td>1.2.2*</td>
<td>Is the future state of the environment/sustainability without the plan been described?</td>
</tr>
<tr>
<td>1.2.3*</td>
<td>Are the different types of development location and extent of the main areas allocated in the plan described and if it is made clear whether they could be affected by the plan or not?</td>
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<tr>
<td>1.2.4</td>
<td>Are the methodologies and indicators used for baseline information been described and justified in areas where surveys have been undertaken?</td>
</tr>
<tr>
<td>1.3</td>
<td>THE AFFECTED ENVIRONMENT: The extent of the environment that would potentially affected by the plan.</td>
</tr>
<tr>
<td>1.3.1</td>
<td>Is the main location of the plan likely to be affected described?</td>
</tr>
<tr>
<td>1.3.2*</td>
<td>Are information on existing environment/sustainability problems and pressure which are relevant to the plan including, in particular, those relevant to any areas of particular environment/sustainability importance provided?</td>
</tr>
<tr>
<td>1.3.3*</td>
<td>Are the wider areas with key assets (renewable and non-renewable resources) beyond the physical boundaries of the plan area, been considered where it is likely to be affected by the plan?</td>
</tr>
<tr>
<td>1.4</td>
<td>OBJECTIVES: A description of how targets might be achieved</td>
</tr>
<tr>
<td>1.4.1</td>
<td>Is the approach to the SA been ‘objectives-led’ and have the objectives been described and defined, quantitatively where appropriate?</td>
</tr>
<tr>
<td>1.4.2</td>
<td>Are objectives provided for the plan considerate of areas like</td>
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<tr>
<td></td>
<td>- Maintenance of high and stable levels of economic growth?</td>
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<td></td>
<td>- Social progress which recognise the needs of everyone/</td>
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<tr>
<td></td>
<td>- Effective protection of the environment?</td>
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<tr>
<td></td>
<td>- Prudent use of natural resources</td>
</tr>
<tr>
<td></td>
<td>IDENTIFICATION AND EVALUATION OF KEY ISSUES (IMPACTS)</td>
</tr>
<tr>
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</tr>
<tr>
<td>2.1</td>
<td>SCOPING OF ENVIRONMENTAL APPRAISAL: This involves explicit and systematic check on policies and impacts to ensure the coverage of all important issues.</td>
</tr>
<tr>
<td>2.1.1*</td>
<td>Are policies, proposal and their impacts including those of alternatives which are potentially significant identified using a systematic method?</td>
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<tr>
<td>2.1.2</td>
<td>Are environmental/sustainability issues considered in assessment listed and described?</td>
</tr>
<tr>
<td>2.1.3</td>
<td>Are information of likely potentially significant impacts on the following environmental receptors and interactions between them identified?</td>
</tr>
<tr>
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<td>- Human beings</td>
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<td>- Flora and fauna</td>
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<td>- Soil</td>
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<td>- Water</td>
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<td>- Climate</td>
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<td>- Landscape</td>
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<td>- Material asset</td>
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<td>- Cultural heritage including architecture and archaeology</td>
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<td>- Biodiversity</td>
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<td></td>
<td>- Interrelationship between all factors</td>
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<tr>
<td>2.1.4</td>
<td>Are the environment/sustainability indicators justified to assist in impact identification?</td>
</tr>
<tr>
<td>2.2</td>
<td>DESCRIBING KEY IMPACTS: This involves describing of the likely impacts of the plan’s policies and proposals including those of its alternatives and considering the type of plan and the state in its preparation.</td>
</tr>
</tbody>
</table>
| 2.2.1* | Is a description of the key impacts of the plans policies and proposal including those of its alternatives identified at the scoping stage given? And is the description in these forms?  
- Direct or indirect  
- Secondary, cumulative and synergistic  
- Permanent and temporary  
- Positive, negative or uncertain  
- Short and long-term (quantified where possible)  
- Impacts of the plans policies and proposal on the local and wider environment (Tranboundary) |
<p>| 2.3 | ASSESSMENT OF IMPACTS: Impacts of plans policies and proposals expected to be significant should be assessed, based where appropriate on their quantification. The rationale, assumption and value judgement used in prediction and assessing significance should be described. |
| 2.3.1 | Are non-significant impact identified with reasons clearly stated? |
| 2.3.2* | Are impact magnitude assessed due to special natural characteristics or cultural heritage, or exceeded environment/sustainability quality standards, exceeded limit values or intensive land values? |
| 2.3.3 | Is the impact magnitude predicted either in quantitative or qualitative term or both? |
| 2.3.4 | Is the methodology used to predict impact magnitude and significance described and justified? |
| 2.4 | APPRAISING SUSTAINABILITY OF THE PLAN: Reviews how sustainability issues were considered in the plan. |
| 2.4.1 | Does the report assess the sustainability of the plan? |
| 2.4.2 | Does the report establish and justify specific criteria for evaluating the sustainability of the plan? |
| 2.4.3 | Does it list the sustainability issue considered and how they were identified? |</p>
<table>
<thead>
<tr>
<th></th>
<th>ALTERNATIVES, MITIGATION MEASURES, MONITORING AND RECOMMENDATION.</th>
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</thead>
<tbody>
<tr>
<td>3.1</td>
<td>ALTERNATIVES: Alternatives to the plans policies, proposals and objectives in the plan making process should be considered outlining the environmental implications of each presented and reasons for their rejection briefly explained.</td>
</tr>
<tr>
<td>3.1.1</td>
<td>Are alternatives for achievement of plans objective or policies identified and described giving the reasons for selecting these for further study considering them against environment/sustainability objectives?</td>
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<tr>
<td>3.1.2</td>
<td>Are the methodology use in identifying alternatives and reasons for choosing such method justified?</td>
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<tr>
<td>3.1.3</td>
<td>Is the reason for eliminating any alternative given?</td>
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<tr>
<td>3.1.4*</td>
<td>Do alternatives consider either the do minimum or business as usual scenarios wherever relevant?</td>
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<tr>
<td>3.1.5*</td>
<td>Are the potential and significant impacts of each alternative clearly described with a defined level of impact and compared?</td>
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<tr>
<td>3.1.6*</td>
<td>Are the inconsistencies between the alternatives and other relevant plans, programmes or policies identified and explained?</td>
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<tr>
<td>3.2</td>
<td>MITIGATION: Any significant impacts likely to result from the plan must be considered for mitigation.</td>
</tr>
<tr>
<td>3.2.1*</td>
<td>Are issues to be taken into account in development consent for mitigation identified?</td>
</tr>
<tr>
<td>3.2.2</td>
<td>Are mitigation measures clearly described to prevent, reduce and as fully as possible offset any significant adverse effects on the environment/sustainability issues of implementing the plan?</td>
</tr>
<tr>
<td>3.3</td>
<td>MONITORING AND REVIEW: Effective proposal to monitor and review impacts arising from the plans, policies and proposal implementation in order, inter alia, to identify at an early stage unforeseen adverse effects.</td>
</tr>
<tr>
<td>3.3.1</td>
<td>Does the report explain how monitoring is done in order to take remedial action by explaining responsibilities of the monitoring process?</td>
</tr>
<tr>
<td>3.3.2*</td>
<td>Is the monitoring suggested to improve the future baseline work and improve the accuracy of information on the existing environment/sustainability in areas where there are gaps in the baseline information, uncertainties or a foreseeable requirement to test the accuracy of the predictions?</td>
</tr>
<tr>
<td>3.3.3*</td>
<td>Are indicators for monitoring clearly defined and are they based upon the original baseline information, indicators and the objectives of the plan and the SA?</td>
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<tr>
<td>3.3.4</td>
<td>Are any environment/sustainability targets provided and if so are they clearly defined?</td>
</tr>
<tr>
<td>3.3.5*</td>
<td>Are contingency arrangements made for action in response to significant adverse effects?</td>
</tr>
<tr>
<td>3.3.6</td>
<td>Are plans for the delivery of follow up measures described?</td>
</tr>
</tbody>
</table>
## COMMUNICATION OF RESULTS

### 4.1 PRESENTATION

Information should be presented in order to ensure that it can be understood even by non-specialists.

| 4.1.1 | Is the information written in concise words, graphics and literal description, faithful data, with a clear viewpoint, sufficient argument and explicit conclusion that can be understood by non-experts? |
| 4.1.2 | Does the SA report identify sources of information, including expert judgement and matters of opinion used and if adequately referenced? |
| 4.1.3 | Are the results made explicit? |

### 4.2 UNCERTAINTIES

Involves acknowledgment of any limitations and uncertainties encountered in information and assessment methods. Reasons for these and how they were handled within the SA should be explained.

| 4.2.1 | Is information on any difficulties or uncertainties encountered in compiling the required information provided? |
| 4.2.2 | Are explanation and justification of how these limitations and uncertainties have been handled within the SA given? |

### 4.3 EMPHASIS

Information should be bias free and receive appropriate emphasis to its importance in report context.

| 4.3.1 | Are emphasis laid on a particular aspect than others? |
| 4.3.2 | Is the report bias free? |

### 4.4 CONSULTATION

Evidence of the interested parties consulted during the appraisal and if their opinions are given due considerations in the report.

| 4.4.1 | Does the report list consultants as part of the report? |
| 4.4.2 | Does report describe the method of how the draft plan and SA report was made available to those consulted or those who had interest in the plan were allowed to express their opinions within an appropriate time frame? |
| 4.4.3 | Does it confirm that there are significant changes to preferred options in the light of the public participation stage and SA will be... |
conducted for the changes?

4.5 NON-TECHNICAL SUMMARY: Describes the main findings of the SA and how they were reached in the report

4.5.1 Is there a non-technical summary for the SA report?

4.5.2 Does it provide an overall clear summary of the report?

4.6 DECISION MAKING AND IMPLEMENTATION OF PLAN: Provides information on the final conclusion reached.

4.6.1* Are environment/sustainability considerations that have been taken into account and rationale for any changes to the plan clearly described?

4.6.2* Are the opinions of those consulted taken into account in decision making described?

4.6.3* Are reasons given for choices in the adopted plan in the light of other reasonable option considered?

*Sub-categories to have at least A, B or C grades

Adapted from Lee et al.1999, IEMA (undated) and Fischer, 2007.

CRITERIA FOR CHANGES

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<th>CHANGES CAUSED BY THE APPRAISAL</th>
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<td>Are changes made to the core strategy?</td>
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<td>Are the changes highlighted in one area?</td>
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<td>Are changes highlighted in separate areas?</td>
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<td>1.4</td>
<td>Are reasons for changes made clear in all cases?</td>
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## APPENDIX 2: COLLATION SHEET RESULT FOR CONSULTANTS REVIEW

### AREA 1 AND 2

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</table>
Grades according to the following Consultants on collation sheet

1. South Cambridgeshire
2. Slough
3. Tower hamlet
4. Castle point
5. South end on sea
6. Tunbridge
7. Tonbridge
8. Ashford
9. Kensington and Chelsea
    This also applies to the result of for changes below

**COLLATION SHEET FOR EFFECTIVENESS**

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Grades according to the following Local Authorities for collation sheet
1. Huntingdonshire
2. Horsham
3. Colchester
4. Breckland
5. North Norfolk
6. Norfolk & Suffolk broads
7. Waveney
8. Merton
9. Redbridge
   This also applies to the result for changes below.

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