LESSONS LEARNED FROM SEA IN TOWN AND COUNTRY PLANNING IN THE UK
Carys Jones
EIA Centre, School of Planning & Landscape, University of Manchester
carys.jones@man.ac.uk

Introduction
The implementation of Directive 2001/42/EC (European Commission, 2001) or the ‘SEA Directive’, in July 2004, will provide, for the first time in the UK, a comprehensive basis for the environmental assessment of plans and programmes. In England, the Office of the Deputy Prime Minister (ODPM) is responsible for incorporating the requirements of the SEA Directive into plan-making. The Scottish Executive and National Assembly of Wales are undertaking similar roles.

This paper provides a detailed analysis of appraisal practice in England, based on research undertaken during 2001-2003, in anticipation of the implementation of the SEA Directive in July 2004. A questionnaire survey was undertaken of all English plan-making authorities between November 2001-February 2002, covering the variety of plans prepared - unitary development, structure, local, minerals and waste. Of the 440 plans identified in England, a total of 352 respondents completed questionnaires representing an 80% response rate. Subsequently, 25 local planning authorities were selected for more in depth research on the use of appraisal during July 2002-March 2003. The 25 cases were selected from the north west and south east regions of England, each region providing different pressures for urbanisation and development. The case studies reflected the overall pattern of plans and appraisals in England including 17 sustainability appraisals, seven environmental appraisals and one SEA. The relevant plan and appraisal were analysed together with interviews with relevant personnel.

Firstly, the context for SEA in the UK is outlined, followed by the approach to implementation. The research findings are then discussed in relation to current practice in appraisal, the utility of appraisal, improving appraisal, key players, treatment of the ‘environment’, changes to plans, and bench-marking of practice against the requirements of the SEA Directive. Conclusions are drawn about the implications for compliance with the requirements of the SEA Directive. Full details of the research and findings are provided in Short et al (2004) and Wood et al (in preparation). Thus the findings from a detailed study of environmental appraisal in England can contribute to rapidly developing thinking on how SEA is likely to operate in practice in the UK.

Context for SEA in England
In England, the planning system is described as ‘plan-led’ and the intention is to provide a comprehensive and systematic hierarchy of national and regional guidance and
development plans (Cullingworth and Nadin, 2002). The Town and Country Planning Act 1990 requires that the development plan sets the context for all planning applications and appeals, and that unless dictated otherwise by material considerations all such applications are dealt with in accordance with the plan.

It is envisaged that the planning system, and particularly development plans, should play an important role in moving towards sustainable development (DETR, 1999a,b). Local planning authorities are expected to carry out a full environmental appraisal for all stages of their development plan. The iterative process should yield clear environmental objectives to inform each part of the plan (DETR, 1999b). However, guidance indicates that social and economic issues are also of concern, and regional authorities are required to assess impacts of strategic options through sustainability appraisal (DETR, 1999c, 2000, 2002).

Previous research in the UK has highlighted the practice of SEA through environmental appraisal (Curran et al, 1998; Therivel, 1998; Russell, 1999) although such practice can only be regarded as partial due to omissions of a baseline environment, alternatives, rigorous quantitative predictions and clear mitigation measures (Therivel, 1998).

Whilst there is no statutory framework for the appraisal of local planning authority development plans at present, the SEA Directive will be implemented in the context of experience of appraising land use plans in terms of environmental aspects and in the broader context of sustainability appraisal incorporating economic and social issues.

Implementation of the SEA Directive
SEA is likely to be appropriate for a wide range of strategic actions, including the full range of development plans produced by planning authorities, other local authority plans (e.g. local transport plans, waste recycling plans, local air quality action plans), regional plans, central government plans (e.g. National Waste Strategy, the ten year transport plan) plans and programmes of non-departmental public bodies (e.g. flood and coastal defence strategies, shore line management plans) and sectoral plans and programmes (e.g. national and regional road programmes (ODPM, 2003).

Guidance has been published for land-use planning (ODPM, 2003) following consultation and review in 2002. This guidance allows for the requirements of the SEA Directive to be addressed through either SEA or sustainability appraisal. Other guidance relating to the application of SEA in the UK includes, Interim Planning Guidance in Scotland (Scottish Executive, 2003) and that being developed by the Department for Transport and the Environment Agency.

Legislation now exists in draft form for plans and programmes in England and consultation on the approach to legislation is being undertaken in Wales.
Current practice
Of those responding, a total of 82% had undertaken some form of appraisal of their plans, with environmental appraisal being utilised slightly more often (54%) than sustainability appraisal (46%). Around 5% of those responding had undertaken both types of appraisal and some point during the various stages of plan preparation. Often environmental appraisal was undertaken during preliminary stages and sustainability appraisal during the latter stages. Figure 1 shows that different types of plan and use of different personnel were linked to the form of appraisal undertaken. In addition, just over one fifth of respondents indicated that appraisals of other local government plans and programmes had also been undertaken.

Government advice was important in encouraging authorities to undertake appraisals (42% of respondents), but other factors provided significant pressure. Sustainable development and Local Agenda 21 considerations were cited by one fifth of respondents, and 13% indicated ‘best practice’ drivers. Structure plan authorities, particularly, were influenced by recommendations in guidance, stakeholder pressure and a desire to improve decision-making.

Over one third of plan making authorities (35%) used some form of external assistance in undertaking their appraisal. Such assistance included other planning authorities, local stakeholders, and key government bodies (eg. Environment Agency), as well as consultancies (17% of all authorities). External involvement was a notable feature for structure plan authorities (64%), and where environmental rather than sustainability appraisal was undertaken (30%).

However, the use of staff trained in environmental issues was surprisingly low - only in 9% of authorities. Perhaps even more surprising was the use of only one member of staff without any internal or external assistance to undertake the appraisal in 43% of plan making bodies. Of these authorities, just under one third used relatively junior and often less experienced staff. However, there was also evidence of certain staff playing a role in a wider context by providing leadership and expertise on a regional basis, eg. in the South West and West Midlands.

The costs associated with undertaking an appraisal relate to financial expenditure and time. These costs are significant, but small in the context of overall costs of plan production. The average amount spent on undertaking an appraisal was £9,100, approximately 3% of the average £295,000 spent on the entire plan process. In terms of time spent, the average of 35 person days was only 0.5% of the 9,000 person days average for the whole plan. Overall, monetary costs of appraisal did not exceed 4% of total plan production and time inputs were less than 2%. Unsurprisingly, on average, sustainability appraisals (£10,500) cost twice as much as environmental appraisals (£5,800). However, sustainability appraisals only took seven more days than the average of 30 days for environmental appraisals.
The prominence given to sustainable development in plan-making in England led to its consideration by 70% of authorities during the process. Sustainability appraisals have been carried out more frequently during recent years, and nearly three quarters of authorities yet to undertake an appraisal indicated that sustainability appraisal was likely to be used. The move to assessment of potential impacts in the wider remit of sustainable development rather than a narrower environmental focus is clear. This was reinforced by 82% of respondents indicating that sustainable appraisal was a more appropriate technique to examine development plans.

Usefulness and impact of appraisals

Just under one third of respondents (29%) indicated that appraisal and influenced development plans (Figure 2). Such influence was greater for structure plan authorities and those using outside assistance (~40%). Interestingly, those authorities undertaking the more focussed environmental appraisals were less likely to believe that the appraisal influenced the plan.

Where the appraisal was believed to have influenced the plan, then encouragingly 59% indicated that such influence was beneficial (Figure 3). The use of both sustainability appraisal and of some form of assistance (~70%) were associated with such positive beliefs. Conversely, more than one third (37%) stated that the influence of the appraisal was adverse.

The vast majority of respondents (97%) indicated a potential relationship between the appraisal process and sustainable development, but only about half of these (48%) believed that the appraisal had actually had some influence on the sustainable development content of the development plan. In part some authorities explained this, as due to plans being formulated in a context of trying to achieve sustainable development principles so that any appraisal made little difference. Other reasons may include a lack of experience in dealing with sustainability issues in substantive ways, lack of monitoring and review of plans, and lack of political will to implement changes proposed by the appraisal process. It is also possible that the role of appraisal is overstated with false expectations of its influence. The majority (81%) of respondents indicated a range of other factors as more important in influencing the sustainable development content of plans, particularly national and regional guidance, external pressure and Local Agenda 21 (Figure 4). However, the importance of raising awareness of sustainable development within authorities was believed to be a principal benefit of appraisal.

Overall, the majority of respondents (87%) indicated that the process of appraisal was worthwhile, particularly those undertaking environmental appraisal (87%) as opposed to sustainability appraisal (67%). This is interesting given the more positive experiences of that undertaking sustainability appraisal. There appear to be added benefits of the appraisal process beyond the development plan, for example understanding the environment and impact of policies (Figure 4).
**Improving the appraisal process**

The suggestions by respondents for improving the effectiveness of appraisal are shown in Figure 5. These responses highlight some of the difficulties currently experienced and the issues that authorities are currently grappling with. The overall perception of the appraisal process is that there should be increased sharing of information, more training and structured guidance rather than increased flexibility and more public participation if appraisal is to be successful.

Authorities with experience of sustainable appraisal were more forthcoming with recommendations as opposed to those undertaking environmental appraisal. They also placed more weight on more effective monitoring, review and consultation and training. However, authorities with experience of environmental appraisal were more concerned with best practice issues, timing of appraisal and a more structured process.

**Key players in the appraisal process**

There appear to be specific parameters of the appraisal process that improve its effectiveness. One of these appears to be the personnel involved in the appraisal. Therivel and Minas (2000) indicated that the involvement of more than one person in the appraisal contributed to changes to the plan. Short et al (2004) indicated that there appeared to be a role for certain practitioners to promote best practice in the use of appraisal tools.

Analysis of the 25 case studies indicated a number of key players in the appraisal process with varying degrees of involvement in, and influence on, the appraisal process. These were:

- consultancies,
- in house staff,
- panels,
- external organisations,
- councillors,
- local communities,
- developers.

Fifteen of the authorities used some form of outside assistance in the appraisal process: six used a consultancy, two used other in-house staff with consultancy advice and seven used a panel. In six authorities, a single member of staff undertook the entire appraisal.

The involvement of these players varied greatly. Developers and community groups were relatively unengaged with the process, but evidence of innovative and useful contributions by authorities, consultancies, panels and external organisations was found. Inevitably, planners undertaking appraisals without assistance perceive their work in a positive light, although there is evidence that such appraisals are weak (Short et al, 2004). A crucial outcome - sometimes overlooked - is the role of the appraisal in...
creating a particular ‘mindset’ (either environmental or sustainability) in those developing the plan.

The ‘environment’ in appraisal practice
There is a clear move in England towards sustainability rather than environmental appraisal. However, the merits of either approach are still being debated, and concerns about the purposes of each form of appraisal. Sustainability appraisal is perceived as a more sophisticated approach due to the greater range of information addressed. Environmental appraisal inevitably deals with a more focussed set of information.

The environment, unsurprisingly, had prominence in environmental appraisals, with those 40% of those undertaking sustainability appraisals indicating equal weightings of the three elements. Interestingly, authorities in the north west of England weighted economic aspects more highly.

A range of environmental information was used by authorities to describe the baseline environment and to appraise the plans. This information was drawn largely from existing sources held by the authority, but also from other parties, such as regional assemblies, non-governmental organisations and other authority departments.

The move from environmental to sustainability appraisal
Five authorities had moved from environmental to sustainability appraisal, mainly so that social and economic issues could formally be included. A more “natural balance” in consideration of issues was thus felt to result by some authorities.

Unsurprisingly, sustainability appraisal was also felt to be more appropriate to the promotion of sustainable development by the majority of authorities. However, environmental appraisal was felt to be a more appropriate tool for this purpose in the rural south east where there is more pressure for development and lack of building land. In such areas, the environment appears to be given more prominence.

Environmental, social and economic criteria
Criteria-based analysis was used in 20 of the appraisals to evaluate effects of the plans. In particular, south east authorities, and those undertaking environmental appraisal favoured this approach. The criteria used were generally of an environmental nature, but also included access, community well-being, health, housing and employment.

The other five authorities – in the north west – used appraisal objectives to evaluate their plans. These objectives were based on a regional approach and gave a common region-wide agenda.

Changes to plans
There was evidence of changes to development plans as a result of undertaking the appraisal process, including environmental and sustainability appraisals. Appraisal appeared to have a particular use in fine-tuning policies and proposals and outline where
potential conflicts might occur. Evidence indicated that the appraisal had an impact on phasing of development and in some cases on the removal of conflicting policies.

**Appraisal in the context of the SEA Directive**

Each appraisal analysed in depth as part of the analysis of the 25 case studies was ascribed as 'met', 'partially met', or 'not met' in relation to nine key requirements of the SEA Directive:

1. description of likely significant effects (Article 5);
2. evaluation of likely significant effects (Article 5);
3. consideration of alternatives (Article 5);
4. consultation and public participation (Article 6);
5. taking the environmental report into account in decision-making (Article 8);
6. provision of information on the decision (Article 9);
7. provision of recommendations (Article 9);
8. monitoring (Article 10); and
9. reporting and review (Article 12).

The findings are summarised in Figure 6.

The identification and evaluation of significant effects was at best only partially met in the majority of the case studies. Future assessments under the SEA Directive were anticipated using value judgements; criteria to test plan objectives and policies; weighting of environmental, social and economic factors; and use of a panel of environmental experts. Only a minority of authorities met the requirement to consider alternatives.

The current English guidance (ODPM, 2003) indicates that English Nature, English Heritage, the Countryside Agency and the Environment Agency should be consulted, but provides no specific indication for public involvement. Consultation with key environmental organisations and the public was undertaken by 40% of the case study authorities. Interestingly, the research indicated a more prevalent culture of consultation and public participation in the north west region.

The majority of planning authorities took the environmental report into account in decision-making, either fully (11) or partially (8). The use of consultancies in the appraisal process appeared to be associated with meeting this aspect of the Directive. In providing information about the decision, 11 authorities failed to meet this requirement, with the remainder divided between either full (6) or partial (8) compliance. A greater number of authorities in the south east failed to undertake this stage. Recommendations for actions arising from any assessment were generally either partially (11) or not met (10).

In terms of reporting and review the SEA Directive stipulates various requirements for Member States, however, a key role for local authorities is to ensure that the 'environmental reports' are of "sufficient quality". Thirteen of the authorities did not
meet this requirement at all, and only two undertook a review of the entire appraisal process. The remaining ten reviewed the main appraisal report. Quality control mechanisms included the use of panels, a single independent reviewer and other colleagues not associated with the appraisal process.

Overall, it appears that the basis for compliance with the SEA Directive does exist although practice tends to be weak.

Conclusions
A number of changes are likely in the English planning system, although development plans in some form will still provide the focus for planning activities (DTLR, 2001). Such plans are likely to be subject to SEA during their preparation. The future appraisal of plans in England is likely to take the form of sustainability appraisal. The guidance prepared on SEA suggests an approach that encompasses both SEA and sustainability appraisal through appraisals that meet the requirements of the Directive and which address social and economic concerns.

This research suggests that changes to practice will be needed to meet the requirements of the SEA Directive. Training in the structure of the appraisal process needs to include best practice examples. Key players, including developers and community groups, need to be engaged in the process. A key area of concern in England is that the environmental focus of assessment is not lost in the move to sustainability appraisal. However, the research also indicated an ability to adapt and develop appraisal to advance best practice, so there can be cautious optimism about the eventual effective implementation of the SEA directive in England.

However, a real political commitment to the process is needed if appraisal is to have a substantial impact on decision making.

Acknowledgements
Funding from the Economic and Social Research to undertake research into the effect of strategic environmental assessment on development plans in England (ESRC reference award number: R000239312) is gratefully acknowledged.

References


DEPARTMENT OF THE ENVIRONMENT, TRANSPORT AND THE REGIONS (1999b)
Regional Planning. Planning Policy Guidance Note 11, London: TSO.

DEPARTMENT OF THE ENVIRONMENT, TRANSPORT AND THE REGIONS (1999c)
Regional Planning Planning Policy Guidance Note 11, TSO, London

Good Practice Guide for the Sustainability Appraisal of Regional Planning
Guidance. London: DETR.

Your Region, Your Choice: Revitalising The English Regions. London: DTLR.

and of the Council of 27 June 2001 on the Assessment of the Effects of Certain

OFFICE OF THE DEPUTY PRIME MINISTER (2003) The Strategic Environmental


SCOTTISH EXECUTIVE (2003) Environmental Assessment of Development Plans
Interim Planning Guidance, Scottish Executive Social Research, Edinburgh.

in the strategic environmental assessment of development plans in England,
Regional Studies in press

THERIVEL, R. (1998) Strategic environmental assessment of development plans in


of environmental and sustainability appraisal in English land use plan-making
Urban Studies.
Figure 1: TYPE OF APPRAISAL - by types of plan and personnel involved

Figure 2: DEGREE OF INFLUENCE OF APPRAISAL PROCESS
Figure 3: NATURE OF THE INFLUENCE OF DEVELOPMENT PLANS

Figure 4: BENEFITS OF UNDERTAKING APPRAISAL

[Charts and diagrams showing the nature and benefits of development plans and appraisal]
Figure 5: SUGGESTIONS FOR IMPROVING EFFECTIVENESS OF APPRAISAL