

Note

HASKONINGDHV UK LIMITED
INDUSTRY, ENERGY & MINING

To : Kay Turton
From : Matthew Hunt
Date : 17 April 2014
Copy :
Our reference : 9X2286/N00001/303653/PBor

**Subject : East Lindsey District Council Sustainability
Appraisal Critical Friend Review**

1. Thank you for inviting Royal HaskoningDHV to act as a 'critical friend', carrying out a high-level assessment of the draft Sustainability Appraisal (SA) for the East Lindsey District Council (ELDC) Core Strategy.
2. It should be noted that this is a high level review of the SA content and its compliance with guidance rather than a detailed review of the policy assessments. We recognise that this is an initial draft of the SA and as such have not carried out a 'proof-read' of the document.
3. This review follows the structure of the draft SA and provides comments by way of guidance towards the further enhancement of the document and its preparation in support of the upcoming Core Strategy. We are pleased to provide our comments below

Overall

4. The draft ELDC SA provides the key material required to fulfil the requirements of a SA, as assessed against both Government guidance, and the requirements of the SEA Directive. It also provides a good account of the iterative process that has been undertaken since 2007.
5. In places, and likely reflecting the extended period over which the policy documents have been produced and the various iterations and changes that that has entailed, we feel that the report could be made more succinct. Whilst it is important that the SA 'tells a good story', removing some of the detail from the narrative might ensure the current assessment focuses attention on the key issues and considerations, and is clear and easier to follow.
6. Although a robust and transparent assessment is clearly critical, together with the audit trail that that entails, this could be achieved by removing some of the detail from previous assessments, and also shortening the Key Sustainability Issues table. Since much or all of this information is in the scoping report, summaries of the key points should be sufficient for the SA report.

Summary

7. A Non-technical Summary (NTS) is a statutory requirement of an SA. We note that there is a summary included as Section 2 of the draft report. Whilst this is a valuable contribution to the document, an NTS which stands alone from the main document is a key requirement. Guidance on what should be included within the NTS can be found within the ODPM 2005 Practical Guide to SEA. This suggests information on the assessment undertaken including methodology and a clear outline of the process to date. As the name suggests, the focus of

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this document is on clear and concise description of the process and the outcomes which result, in a way which is accessible to all members of the community. We have often found it useful that this is written, or at least edited, by someone outside the core SA team.

Methodology

8. Particularly in light of the extended assessment and plan development period, and the various iterations undertaken, we advise that the methodology section is expanded to provide further details on the process that ELDC undertook.
9. It is appropriate to include a figure showing each stage of the SA process, based on guidance, but we think it would be helpful to expand on how ELDC carried out each of these stages, and at which point in the process. Whilst this need not be expansive in terms of text – a paragraph or two per stage/iteration usually suffices – this does aid transparency and also reinforces the rigour with which developing policies have been assessed iteratively, and developed based on the findings of, among other things, the sustainability appraisal.

Policies and Objectives

10. At present it is difficult to distinguish between the differing levels of policy within the draft SA report and how these are all interrelated. Clear naming and numbering of the policies would help in this regard.
11. Whilst this may in part be a presentational point, clear information and descriptions should be provided on the Vision, Objectives and Policies that are been assessed within the SA, with reference numbers for easy cross referencing and understanding when reading the SA. The Vision and Objectives should also themselves be subject to the SA, and a cross-comparison of the plan objectives and SA objectives provided.

Assessment

12. The draft SA includes a lot of discussion of the previous policies and their assessments, rather than focusing on the 2013 assessments. While we agree that it is important to show the iterative process that has been undertaken, and the ways in which policies have evolved in response to the SA process and other information, in places this can distract from the current assessment. We suggest that the previous assessments can be summarised further, possibly by focusing on those things that have changed due to recommendations from earlier stages of the assessment. This would allow the iterative process to be accounted for, transparency and audit trail maintained, but enabling the SA report itself to focus more on the final results from the 2013 assessment. If desired, more detailed tables could be provided in appendices.
13. A summary table based on a traffic light system could be included to show an overview of the assessments results, and where the issues and benefits arise from the policies. This would help clarify the final assessment results. The use of symbols as well as colours ensures that the table is accessible to the visually-impaired and colour-blind, and also clear when printed in black-and-white. An example of this is provided for your information. For this to be a useful reference guide to the assessment the SA objectives and policies will need to be given clear reference numbers (see paragraph 10 above).
14. Due to the high level nature of this review we have not undertaken a thorough review of the findings presented in the Assessment Tables in Appendix 1 and 2. However, brief

consideration suggests that there are some areas of the tables that may require clarifications and amendments. We would recommend a thorough review of the tables to check for inconsistencies (e.g. there appears to be some repetition of assessments for different SA objectives) and ensure that the assessments remain appropriate. We have included an example of assessment tables we have previously used for SAs for your information.

Cumulative, Synergistic and Indirect effects

15. Under the SEA Directive there is a requirement for assessment of the Cumulative, Synergistic and Indirect effects of a plan or project. As present within the ELDC draft SA it is not clear that this has been covered. This is an essential part of an SEA, and wider socio-environmental assessments, and is particularly critical at the strategic level. Moreover it remains an area where many assessments are found to be weak, and therefore subject to external challenge. We recommend that this assessment is included within the document, or where considerations have been made that the conclusions are made more explicit within the SA report.

Structure

16. We have suggested a slightly amended structure for the report which we feel will make the assessment process clearer to follow. This combines a broad structure employed in our SA and SEA work with the current structure of the ELDC report. The restructured content list with suggested headings and content is below.

1 Introduction

1.1 Local Planning Policy History

This section can cover the history of the Core Strategy and its associated documents (covered already in the East Lindsey Core Strategy – Background section)

1.2 Local Plan Development and Assessment Process to Date

Clear section outlining the SA process to date and how it ties into the development of the Core Strategy (recommend moving the current When the SA was carried out, who carried it out, who was consulted, when and how section forward)

1.3 Assessing Sustainability

Short section outlining the need for SA and SEA (relevant legislation etc)

1.4 Purpose of this Report

2 The Appraisal Methodology

2.1 Meeting the requirements of the SEA Directive

Clear section on SEA and how this has been included in the SA. A table cross-referencing statutory requirements and SA report contents is a useful guide here.

2.2 Appraisal Process

Breakdown of each stage of the SA process (e.g. Stage B under the guidance) and what was undertaken. Include a clear methodology for appraising the impacts and the scale used. Also include a section on how cumulative and secondary effects were considered to address SEA requirements

3 Relevant Plans and Programmes

3.1 International, national and local plans and policies

Section identifying relevant legislation, plans and policies. As this information should be contained within the SA scoping report this can be a summary section, or table, highlighting key documents, cross-referencing the scoping report (which can be appended) and identifying new and important plans/policies.

3.2 Relevant Social, Environmental and Economic Priorities

Based on the previously identified legislation, plans and policies this section identifies what priorities have influenced the Core Strategy and the SA. Table format is a simple way to present this information.

4 Baseline Information

Summary of baseline information collected to date. Reference back to Scoping Report for more detailed information. A summary table identifying the key issues is useful to show that the SA and the Core Strategy are focused on the Districts problems. Also need to include a section on future trends.

5 The Sustainability Appraisal Framework

Table presenting the SA Objectives, Indicators and Targets

6 Objectives Compatibility Assessment

Assessment of Core Strategy Objectives against the SA Objectives. A summary traffic light table is useful to easily identify how compatible the two sets of objectives are.

7 LDP Policy Assessment

7.1 Consideration of Alternatives

Description of the key alternatives assessed through the iterative process, and the rationale for their being excluded. Cross-referencing more detailed information in appendices.

7.2 Policy Assessment

Description of the effects predicted to arise from the policies proposed by the plan. Could include a summary table of effects against SA objectives also.

8 Cumulative, Synergistic and Indirect Effects

A requirement of the SEA regulations to show how policies may interact with each other.

9 Mitigation

Doesn't have to be a separate section but it is a useful way of clearly identifying what mitigation was previously identified, how it has been incorporated into the Core Strategy and what mitigation is still recommended.

10 Monitoring

Requirement of both SA and SEA.

10.1 Significant Effects

11 Conclusion

12 References

Conclusion

17. We have carried out high level review and presented our thoughts and recommendations on the SA in the sections above. We trust that this review is useful and would be pleased to be involved in later stages as appropriate.