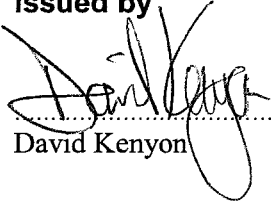

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North West Regional Assembly

Sustainability Appraisal of the Draft North West Regional Spatial Strategy

Sustainability Appraisal Report of the Draft
Regional Spatial Strategy for the North
West of England

20 January 2006

Entec UK Limited in association with Ben
Cave Associates Ltd and Levett Therivel



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1 Introduction

1.1 Purpose of the Sustainability Appraisal Report

This document is the Sustainability Appraisal Report for the Draft Regional Spatial Strategy for the North West. It has been produced following the implementation of the European Commission Directive 2001/42/EC (transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004) which requires a Strategic Environmental Assessment (SEA) be undertaken for certain plans and programmes. The Directive is commonly known as the SEA Directive. This report has also been informed by *A Practical Guide to the Strategic Environmental Assessment Directive*, published by the Office of the Deputy Prime Minister (ODPM) in September 2005 and *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents ODPM 2005*. The format of this report broadly follows the structure and contents of the Sustainability Report provided within Figure 40, Annex 15 of this latter document.

To ensure that the assessment of the Draft RSS was independent, objective and rigorous, the North West Regional Assembly (NWRA) commissioned Entec UK Ltd, to undertake a Sustainability Appraisal of the emerging Draft RSS (incorporating the requirements of the SEA Directive) and to produce a Sustainability Appraisal Report documenting the results of the appraisal process.

This Report sets out the methodology used to undertake the appraisal as well as the recommendations and conclusions emerging from the appraisal process. It follows the publication and consultation on the Scoping Report which was issued in February 2005.

1.2 Sustainable Development and Strategic Environmental Assessment

1.2.1 Sustainable Development

A widely used definition of sustainable development is 'Development which meets the needs of the present without compromising the ability of future generations to meet their own needs'. Sustainable development, as defined by UK Government, is the integration of social, economic and environmental objectives.

The new UK Government Sustainable Development Strategy: *Securing the Future*¹ contains four priority areas for immediate action and emphasises the need for changing behaviour to bring about long-term sustainability improvements. The four areas for action are:

5. Sustainable Consumption and Production
6. Climate Change and Energy

¹ DEFRA (March 2005), *Securing the Future: delivering the UK sustainable development strategy*.

-
7. Natural Resource Protection and Environmental Enhancement
 8. Sustainable Communities.

The links between sustainable development and health and wellbeing are strongly made in the UK Sustainable Development Strategy:

'Although climate change is the most serious global environmental threat, promoting new, modern, sustainable ways of living, working, producing and travelling also stand to achieve wider benefits to human health and well being. We need to maintain our duty of care towards our natural resources, for our own benefit and for the benefit of future generations.'

UK Sustainable Development Strategy

Poor health has been identified as a key issue facing the region and Section 6 reports upon the work of Health Impact in the sustainability appraisal process.

1.2.2 Strategic Environmental Assessment

The European Directive 2001/42/EC requires a 'Strategic Environmental Assessment' (SEA) of certain plans and programmes. The objective of the Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'* (Article 1). These aims are consistent with a range of UK Government policies on the environment and sustainable development.

The Directive applies to all relevant plans and programmes² whose formal preparation began after 21st July 2004 and those that will not be adopted by 21st June 2006. The Directive has been transposed into UK Legislation through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633).

The Directive defines "environmental assessment" as a procedure comprising:

- preparing an Environmental Report on the likely significant effects of the draft plan or programme;
- carrying out consultation on the draft plan or programme and the accompanying Environmental Report;
- taking into account the Environmental Report and the results of consultation in decision making; and
- providing information when the plan or programme is adopted and showing how the results of the environmental assessment have been taken into account.

In line with the ODPM Guidance 2005, this SA Report clearly shows that the SEA Directives requirements have been met through the use of signposting shown in a bold typeface.

The SEA Directive specifically requires the consideration of the likely significant effects on a range of environmental issues, including *human health*.

² There are a number of other caveats which dictate whether an SEA will be required

1.2.3 Sustainable Development and Regional Spatial Strategies

Section 5 of the Planning and Compulsory Purchase Act 2004 requires Regional Planning Boards (RPB) to prepare a draft revision of their RSS. In preparing the draft revision the RPB are required, amongst others, to undertake an appraisal of the sustainability of the proposals in the draft and to prepare a report of the findings of the appraisal. Sustainability appraisal is a systematic and iterative appraisal process that should incorporate the requirements of the SEA Directive; the purpose being to appraise the social, environmental and economic effects of the strategies and policies in the RSS. Planning Policy Statement 11: Regional Spatial Strategies recommends (paragraph 2.10) that a starting point and background against which RSS's should be assessed is the relevant Regional Spatial Development Framework (RSDF). The RSDF is the high level statement of the regional vision for achieving sustainable development and provides an essential part of the background against which all regional strategies are prepared. It should be the starting point for developing a RSS, putting sustainable development at the heart of a spatial strategy in accordance with section 39 of the Act. The RSDF also has a key role in identifying and resolving any conflicts between the RSS and other regional strategies to ensure a fully integrated approach to sustainable development. In the North West context, the RSDF is known as Action for Sustainability.

This report sets out the results of an appraisal of the draft Revisions to the North West RSS. The appraisal focuses upon the draft policies proposed by the NWRA, and their evolution through the consideration of options. This report considers the sustainability issues that face the region which were identified within the NW RSS Sustainability Scoping Report which was issued in February 2005 for consultation.

1.3 Draft RSS Vision and Objectives

The SEA Directive requires that an outline of the main objectives of the plan is provided.
The Draft RSS vision is:

'By 2021 we will see a North West that has realised a higher quality of life for all its citizens through improved prosperity, embracing the principles of sustainable development, thereby reducing economic and other disparities within the North West and with the UK as a whole.'

The strategic objectives for the Draft RSS are reproduced in Table 1.1 below and considered later within this document at Section 6.

Table 1.1 Draft RSS Objectives

-
1. Improved, sustainable economic growth, closing the gap with parts of the country that have the highest economic performance;
 2. A more competitive, productive and inclusive regional economy, with more people in employment that uses and develops their knowledge and skills;
 3. The development of urban, rural and coastal communities as safe, sustainable, attractive and distinctive places to live, work and visit;
 4. The reduction of economic, environmental, educational, health and other social inequalities between North West communities;
 5. The protection and enhancement of the region's built and natural environmental assets , its coastal areas and unique culture and heritage;
 6. The active management and prudent use our natural and man made resources, with fewer emissions of key greenhouse gases, and the most efficient use of infrastructure;
 7. The introduction of a safe, reliable and effective integrated transport network that supports opportunities for sustainable growth and provides better links with jobs and services.
-

1.4 Structure of Report

Section 2 of the report provides the appraisal methodology used for the consideration of the emerging Draft RSS. Section 3 summarises the baseline context, including links with plans programmes and strategies and reintroduces the SA framework. Section 4 provides the evolution and assessment of the Options for the Draft RSS. The assessment of the RSS policies (including recommendations and mitigation) is presented in Section 5 and the suggested monitoring framework is provided in Section 6. The extensive baseline table and review of plans, programmes and strategies that lie behind some of the work and assumptions made in this report have been produced in a separate technical document to this SA Report. This has been undertaken to allow this report to focus upon the key issues of significance and to ensure that it is kept concise. This technical document is issued in tandem with this SA Report.

2. Appraisal Methodology

The approach adopted for the assessment of the Draft RSS draws on both Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) guidance. An integrated SA and SEA process can be defined as

*"a systematic and iterative process incorporating the requirements of the Strategic Environmental Assessment Directive. The main purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a local development document from the outset of the preparation process"*³.

This integrated approach is referred to simply as SA in this report.

The appraisal is a qualitative exercise that uses the expertise of the appraisers and consultees and available baseline information to assess the impacts of the strategy on each sustainability objective.

2.1 Stages and Tasks in the Appraisal Process

Table 2.1 identifies the stages involved in sustainability appraisal. The purpose of these stages is described as well as a cross-reference to the relevant section of this report.

Table 2.1 Stages in the SA Process and their Purpose (adapted from ODPM, 2005⁴)

SA Stages and Tasks	Purpose	Comments
SA Stage A: Setting the context and objectives, establishing the baseline and		
A1: Identifying other relevant policies, plans, programmes and sustainability objectives.	To support the identification of issues that face the region; to contribute to the identification of targets and indicators and to inform the development of the SA Framework	Original identification within Scoping Report February 2005, updated in the technical document.
A2: Collecting baseline information.	To inform the identification of key sustainability issues that face the region.	Reported within the scoping report and summarised and updated at section 3 and within the technical document.

³ PPS11: Regional Spatial Strategies (ODPM, 2004).

⁴ ODPM (Nov, 2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*.

Table 2.1 (continued) Stages in the SA Process and their Purpose (adapted from ODPM, 2005⁵)

SA Stages and Tasks	Purpose	Comments
A3: Identifying sustainability issues and problems.	To inform the development of the framework, and the assessment of significance.	SA Report, updated within Section 3.
A4: Developing the SA framework.	To support the assessment of significance of options and policies against key SA objectives	Reported within Scoping Report and updated within Section 3.
A5: Consulting on the scope of the SA.	To help focus the SA and streamline the subsequent stages including baseline information analysis, setting of the SA objectives, prediction of effects and monitoring.	Scoping Report February 2005. Response to consultations within technical document.
SA Stage B: Developing and refining options and assessing effects		
B1: Testing the RSS revision objectives against the SA framework.	To ensure that the overall objectives of the RSS are in accordance with the SA objectives and provide a suitable framework for developing options and policies	The compatibility matrix used to test the draft RSS objectives are included at Appendix C and reported in Section 5.
B2: Developing the RSS revision options.	To assist in the development and refinement of the strategic alternatives by identifying potential sustainability impacts of alternatives for achieving the RSS objectives	Assessed and reported on within Entec's Report RSS Options 19.05.05 and summarised within Section 4.
B3: Predicting the effects of the RSS revision.	To predict the significant sustainability effects of the Draft RSS Revision	Appraisals of the Revision were undertaken. The recommendations for mitigation are identified in Section 5.
B4: Evaluating the effects of the RSS revision.	Using the framework to evaluate the significance of the identified effects.	Effects are reported within Section 5.
B5: Considering ways of mitigating adverse effects and maximising beneficial effects.	To ensure all potential mitigation measures are considered and as a result residual effects are identified	Mitigating measures were identified and are reported at Section 5.
B6: Proposing measures to monitor the significant effects of implementing the RSS revision.	To detail the means by which the sustainability performance of the Draft RSS Revision can be assessed	These are identified in Section 6.
Stage C: Preparing the Sustainability Appraisal Report		
C1: Preparing the SA Report.	To provide a detailed account of the SA process, including the findings of the sustainability assessment and how it influenced the development of the draft RSS Revision, in a format suitable for public consultation and decision-makers	This document forms the SA Report.

⁵ ODPM (Nov, 2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*.

Table 2.1 (continued) Stages in the SA Process and their Purpose (adapted from ODPM, 2005⁶)

SA Stages and Tasks	Purpose	Comments
SA Stage D: Consulting on the draft RSS revision and the SA Report		
D1 Consulting on the draft RSS revision and SA Report.	To provide the public and Consultation Bodies with an opportunity to express their opinions on the findings of the SA Report and to use it as a reference point in commenting on the Draft RSS revision. To gather more information on the baselines and sustainability problems through the opinions and concerns of the public.	This stage has not yet been reached.
D2: Appraising any significant changes proposed by the Secretary of State.	To ensure that any significant changes to the draft plan or programme are assessed for their sustainability implications and influence the revision of the RSS Revision.	This stage has not yet been reached.
D3: Making decisions and providing information.	To ensure that further significant changes made as a result of the examination process are assessed.	This stage has not yet been reached.
SA Stage E: Monitoring the significant effects of implementing the RSS revision		
E1: Finalising aims and methods for monitoring.	To measure the environmental performance of the RSS Revision in order to determine whether its effects are as anticipated, and thereby inform future revisions	This stage has not yet been reached, although provisional indicators for monitoring are included in Section 6.
E2: Responding to adverse effects.	Ensure that adverse effects can be identified and appropriate responses developed	This stage has not yet been reached.

Compliance with the SEA Directive

ODPM considers that the stages listed above incorporate the requirements of the SEA Directive. For clarity however Table 2.2 below identifies the explicit requirements for an Environmental report contained within Annex 1 of the Directive and demonstrates that they have all been addressed within the SA process that is reported within this document.

⁶ ODPM (Nov, 2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*.

Table 2.2 Information referred to in Article 5(1)

Information	Comments
Outline of contents and objectives of Plan or programme and relationship with other relevant plans and programmes	Vision and objectives of Draft RSS are within Section 1.3. Inter-relationship with plans and programmes is summarised within section 3.1 and Appendix A. The accompanying technical document provides a detailed assessment of plans and programmes.
Relevant aspects of the current state of the environment and likely evolution thereof.	Reported within Section 3.2 and within the accompanying technical document.
Environmental characteristics of areas likely to be significantly affected.	These are the sub-regions. Characteristics are reported within Table 4.1.
Any existing environmental problems established at international, community or member state level and the way that the objectives have been taken into account in preparation.	Appendix A identifies the main issues that are covered by European Directives, National and Regional Plans and Strategies. It demonstrates that the SA Objectives have taken these issues into consideration. Section 5.3 assesses the compatibility of the RSS Objectives against the SA Objectives.
Likely significant effects on the environment.	These are identified within the appraisal matrices contained within the accompanying technical document. They are summarised within Section 5 of this report.
Measures envisaged to prevent, reduce and offset significant adverse effects.	Mitigation is identified within Section 5.
Outline of the reasons for selecting alternatives and a description of how the assessment was undertaken and any technical difficulties.	Option development for the region and sub-regional policies is identified within section 4. Difficulties encountered with the overall appraisal process are reported at section 2.6.
Description of measures envisaged concerning monitoring	Monitoring measures are at Section 6.
A non technical summary	The NTS precedes the main report. It outlines the differences the SA process made to the Draft RSS.

It should be noted that the SEA and SA processes are iterative and should continue beyond the production of this report.

2.2 The Approaches Adopted in the Appraisal Process

There are a number of specific tools and techniques used to undertake the tasks identified in Table 2.1 which are described in more detail in the following sub-section. They include;

1. Undertaking Appraisal Workshops:
2. Measuring Significance:
3. Developing and Assessing Options/ Alternatives:
4. Assessing Rural Impacts:
5. Identifying Health Impacts.

2.2.1 Undertaking Appraisal Workshops

The main tool used for assessing the performance of the options and emerging policies was a workshop appraisal. The aim of the workshop is to appraise the issues that face the region and the extent to which options or policies will support or detract from them. These sessions provide the opportunities for discussion to be held and the differences of options and policies to be recorded within an overall matrix. The appraisal matrix also provides the opportunity to consider significance and the extent to which the policy or option may move the North West towards or away from sustainable development. The results of the appraisal also record the following measures:

- Direction of Effect - is the effect positive or negative in terms of sustainability?
- Severity of Effect - will the effect be marginal or significant? This is a qualitative conclusion based on professional judgement and opinions received through consultation and are considered relative to the baseline evidence;
- Geographical Scale - will the effect be felt differentially within the urban or rural environment and are there any effects outside the Region?
- Timing of Effect - will the effect manifest itself in the short, medium or the long term either during the lifetime of the RSS and/ or beyond?
- Cumulative Effects - there may be scope for some cumulative effects, e.g. on an environmental resource or a geographical area. Such effects could be positive or negative in nature and will be identified in the commentary. Furthermore individual policies may have cumulative effects when assessed in conjunction with other policies within the Draft RSS.

With regard to the appraisal of the options the findings are presented within Section 4 whilst the findings of the final Draft Submitted RSS are reported in Section 5.

2.2.2 Measuring Significance

Annex II of the SEA Directive provides criteria for determining the likely significance of effects, which should have regard to the characteristics of the plan or programme (e.g. the relevance of the plan for integration of environmental considerations) and the areas likely to be affected (e.g. the value of the receiving environment and factors related to the area's special characteristics) and the nature of those effects (e.g. the reversibility of the effect, its duration and frequency, its cumulative nature and spatial extent etc).

European guidance (European Commission, 2003) recognises that in determining significance many uncertainties exist and insufficient or missing data and inadequate knowledge may make it difficult to decide whether significant effects are likely. Nevertheless, it is assumed that a rough estimation of the effects should always be possible.

Further advice on the assessment of effects is provided within Annex 12 and 13 of the ODPM Guidance, November 2005.

2.2.3 Developing and Assessing Options/ Alternatives

The SEA Directive states that the Environmental Report should consider *'reasonable alternatives taking into account the objectives and the geographical scope of the plan or*

programme and give *'an outline of the reasons for selecting the alternatives dealt with'* (Article 5.1 and Annex 1(h)). It is not the purpose of the SEA/SA to decide which option (alternative) should be chosen for the strategy, this is the role of the decision-makers. The SA simply provides information on the relative sustainability performance of options. The process of developing options for the Draft RSS has including consideration of sub-regional and regional options, in tandem with a review of regional priorities for transport investment and management in the North West. It should also be understood that the Draft RSS is a revision and that it therefore builds upon the current RPG13 and the Partial Review of RPG13, the latter undertaken in 2004. RPG13 was subject to a review of options. Further explanation on the development of options, and the appraisals, their results and recommendations are provided within Section 4.

2.2.4 Assessing Rural Impacts

The appraisal process recognises that the region is one of contrast, consisting of major cities, and surrounding metropolitan areas together with rural service centres and 'sparse' rural areas. In recognition of the potential for impacts to differ upon urban or rural receptors the appraisal framework (introduced within Section 3) includes for the assessment of urban and/ or rural impacts. Commentary upon the specific rural impacts of the policies is provided within Section 5. In order to ensure that a range of possible rural issues are addressed during the appraisal the SA Objectives were scoped against the Countryside Agency's Rural Proofing Checklist. The results of this exercise are contained within the accompanying technical document.

2.2.5 Identifying Health Effects

As described above the appraisal process recognises inequalities within the region. An advisory paper to the RSS describes how the health of people generally in the North West is poor relative to other regions and national averages.⁷ The *Investment for Health*⁸ report attributes this situation to the legacy of the industrial revolution which has led to a concentration of population in older, urban areas with high levels of poverty and deprivation and a relatively poor environment, infrastructure and housing stock. Improvement in the overall level of health in the region is therefore of general concern. Within this regional picture of relatively poor health are hidden groups and individuals with exceptionally poor health. This experience tends to be concentrated within particular groups such as the elderly, the disabled and Black and Minority Ethnic groups. These health inequalities also tend to be spatially concentrated, notably amongst the most deprived inner city areas and outer council estates but also within smaller urban centres, rural areas (as above) and coastal resorts. Reducing inequalities within the region, with particular focus on priority groups and areas is therefore a second area of concern.

A workshop with a focus on health and wellbeing issues was held to ensure these issues were considered within the SA process.

⁷ Kidd, S. Technical Advisory Paper on the North West Regional Spatial Strategy and health. Draft Report. 2004. PEARL. Department of Civic Design, University of Liverpool.

⁸ Government Office North West, North West Development Agency, Regional Public Health Group North West. *Investment for health: a plan for North West England*. 2003.

2.3 Undertaking the Sustainability Process

The SA is an iterative process which, for the Draft RSS began in November 2004 with the appointment of consultees to undertake the SA, incorporating SEA. The first stage in the SA process was the development of the draft SA Objectives and baseline which was reported within the Scoping Report of February 2005. Subsequently the finalised SA Framework was used to appraise emerging options during two workshops held in March and April 2005 with findings reported and discussed with policy authors. A second round of appraisal was undertaken in October/ November 2005 leading to two further workshops on 8 and 23 November respectively. Further meetings were then held with policy authors leading to the preparation of the Final Draft RSS, the policies of which were again appraised in December 2005.

2.4 Participants in the SA Process

The SA was led by sustainability consultants from Entec UK Ltd. Entec has a strong track record in undertaking SA, SEA and EIA of plan, programmes, strategies and development proposals. In parallel to the ongoing SA of the Draft RSS Revision Entec consultants have also prepared the SA/SEA of the North West Regional Economic Strategy, in addition to appraisals of LDFs within the north-west and regional and sub-regional strategies elsewhere in England.

Supporting Entec in the SA has been Ben Cave Associates and Levett Therivel. Ben Cave Associates have provided advice on the health impact of options and policies throughout the consultation process, they have an established track record in health impact and policy and are currently advising the Greater London Authority on health issues within the London Plan. Levett Therivel have extensive experience in SA/SEA and have recently worked on a similar study for the East of England, Yorkshire and Humber and South West RSS.

Whilst the SA was led by the consultants listed above, it is important to recognise that their role was one of facilitation and advice and that much of the findings and recommendations were developed within a consultative workshop format with consultees. Workshops were attended by the following:

Table 2.3 Workshop Participants

Participant	Organisation	Participant	Organisation
Options Workshop 15 March 2005			
Robert Johnstone	Equality and Diversity	John Forster	Lancaster University
John Berry	CPRE, North West Transport Action Group	Heidi Curran	Environment Agency
Brenda Fullard	Dept of Health, GONW	Matthew Wilkinson	NWRA
Simon Nokes	NWDA/ Economic Development	David Kenyon	Entec
Graham Ashworth	Rural	Clive Harridge	Entec

Table 2.3 (continued) Workshop Participants

Participant	Organisation	Participant	Organisation
Options Workshop 11 April 2005			
Robert Johnstone	Equality and Diversity	John Forster	Lancaster University
John Berry	CPRE, North West Transport Action Group	Heidi Curran	Environment Agency
Brenda Fullard	Public Health	Matthew Wilkinson	NWRA
David Kenyon	Entec	Clive Harridge	Entec
Ben Cave	Ben Cave Assocs	Duncan McCorquodale	NWRA
Interim Draft RSS Revisions Workshop 8 November			
Matthew Wilkinson	NWRA	Neil Wilton	NWDA
Dave Dunlop	Lancs, Manchester and N Merseyside Wildlife Trust	Andrea Titterington	CABE
Brenda Fullard	Dept of Health, GONW	Peter Greifenberg	Consultant for Waste Policies
Heidi Curran	Environment Agency	David Kenyon	Entec
Phillip Minas	Entec	John Hall	Entec
Interim Draft RSS Revisions Workshop 23 November			
Matthew Wilkinson	NWRA	Duncan McCorquodale	NWRA
Francis McGuire	RSPB	Andrea Titterington	CABE
Brenda Fullard	Dept of Health, GONW	John Berry	CPRE
Heidi Curran	Environment Agency	David Kenyon	Entec
Clive Harridge	Entec	Steven Glynn	Sustainability Northwest
Robert Johnstone	NW Equality and Diversity Group		

To ensure that the appraisal process was unbiased the NWRA were keen to ensure that policy authors did not actively contribute in the appraisal of options and policies. At certain workshops a representative from the NWRA did explain the rationale to the policies, in advance of their appraisal.

2.5 The Consultation Process

As with the appraisal, consultation is an iterative process and reflects both statutory and non-statutory requirements. At the outset of the appraisal a Reference Group was established to advise upon the process and it consisted of representatives from the following statutory consultation organisations:

-
- Environment Agency;
 - English Nature;
 - English Heritage;
 - Countryside Agency.

Meetings were subsequently held with this group during the scoping, options and policy appraisal stages and on the following dates:

- 23 February 2005
- 26 April 2005
- 1 August 2005
- 12 December 2005

In addition to attendance at meetings the agencies listed above were formally consulted on the scoping report, and their comments and advice considered accordingly. Wider non-statutory consultation was also undertaken via 'Dialogue by Design' a web-based consultation tool. Findings and recommendations stemming from the options, policy appraisals and the results of discussions with policy authors were also placed on the NWRA web-page (<http://rpg.nwra.gov.uk/planning/rssappraisal.php>).

2.6 Technical Difficulties

The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered. Difficulties experienced during the SA of the Draft RSS have included the following:

Data and Baseline Information: whilst there is a significant amount of data available to enable a profile of the region to be prepared, and significant issues that can be identified, not all information is directly comparable across appropriate geographical areas, for example the City Regions.

Workshop Participation: the SA workshops sought to include a wide range of representative organisations covering social, economic and environmental interests. Whilst consistency was sought it was not possible for all participants to attend every workshop during 2005.

Policy Release: the iterative nature of policy preparation is such that the time period between the release of policies for appraisal, and the deadline for reporting, is by definition short requiring an intensive period of appraisal.

