Strategic Environmental Assessment of Local Implementation Plans: Environmental Report Template

by S Simmons

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STRATEGIC ENVIRONMENTAL ASSESSMENT OF LOCAL IMPLEMENTATION PLANS: ENVIRONMENTAL REPORT TEMPLATE

Version: Final

by S Simmons

Contact: ctreleven@trl.co.uk

Client: Association of London Government (Damian Price)

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	Approvals
Project Manager	**Colin Treleven**
Quality Reviewed	**Chris Fry**

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1 Introduction

The purpose of this report is to assist London Boroughs with the Strategic Environmental Assessment (SEA) of their Local Implementation Plans. This report should be read together with the Advice Note prepared by C4S/TRL for London Boroughs in September 2004 and used with the following documents:

- Strategic Environmental Assessment of Local Implementation Plans: Sources of baseline data for stage A,
- Strategic Environmental Assessment of Local Implementation Plans: Problems and opportunities of relevance to SEAs for LIPs,
- Strategic Environmental Assessment of Local Implementation Plans: SEA objectives for stage A,
- Strategic Environmental Assessment of Local Implementation Plans: Scoping report template,
- Strategic Environmental Assessment of Local Implementation Plans: Selecting and documenting alternatives,
- Strategic Environmental Assessment of Local Implementation Plans: Significance criteria.

These additional documents can be found at; http://www.sea-info.net/sea_lips.htm

In the Advice Note, the SEA was considered in five Stages:

Stage A: Context and Baseline

Stage B: Scope and Alternatives

Stage C: Assessment and Mitigation

Stage D: Consultation and Report

Stage E: Monitoring

This document is concerned with the production of the Environmental Report, which is part of Stage D. This document also considers the assurance of the Environmental Report's quality, through the use of review criteria.

Chapter 2 explains the purpose of the Environmental Report.

Chapter 3 provides a template for a Borough Environmental Report.

Chapter 4 provides review criteria to help ensure the quality of the Environmental Report.

At the time of writing this document, the authors are not aware of any Environmental Reports for the SEAs of transport plans that have been completed and made available in the UK. Some London Boroughs are likely to publish their Environmental Reports during early January 2005.

This document provides guidance for Boroughs. The intention of the guidance is to show Boroughs one way of presenting information in an Environmental Report that will form part of an effective SEA. This document also makes specific reference to various parts of the SEA Regulations[1]. When in doubt, Boroughs' own legal departments should be consulted for advice on the steps that a Borough needs to take in order to satisfy the SEA Regulations.

[1] Statutory Instrument 2004 No.1633 *The Environmental Assessment of Plans and Programmes Regulations 2004* HMSO

2 Purpose of the Environmental Report

2.1 Aims of the Environmental Report

The Environmental Report is the main written output of the SEA process. It serves two principal aims:

- The majority of the SEA process is documented in the report. This allows active and transparent consultation on the draft LIP, with the aim of improving the LIP.
- The Environmental Report helps to illustrate compliance with the SEA Regulations' requirements.

Table 1 illustrates the benefits of producing an Environmental Report for stakeholder consultation.

Table 1: Benefits of actively involving the public and the statutory environmental bodies in the LIP and SEA process Source: *Adapted from IEMA (2002)*

Plan /Decision-maker	Stakeholders
Achieves more informed and accountable decision-making and hopefully a better plan!	Provides an opportunity to raise concerns and influence the LIP
Provides increased assurance that all issues of legitimate concern have been addressed in the LIP	Provides an opportunity to gain a better understanding about environmental effects of different options
Decision-making is seen to be transparent and informed	Increases understanding of how decision making processes work
Promotes good relations with the public and statutory environmental bodies	Empowers people, by enabling them to influence the decisions taken in the LIP and creating a sense of social responsibility
Can help avoid delays in the LIP adoption process	Ensures all relevant issues and concerns are dealt with prior to the adoption of the LIP
Promotes integration between the LIP and policies plans and programmes of other stakeholders e.g. the Environmental Bodies and other organisations	

2.2 What the SEA Regulations require

2.2.1 Regulation 12(1)

Regulation 12(1) requires the production of an 'Environmental Report', as an integral part of an SEA. In the case of London Boroughs, the Environmental Report is due to be produced in time to accompany the draft LIP when it goes out for public consultation in January 2005.

2.2.2 Regulation 12(2)

Regulation 12(2) states that:

'The report shall identify, describe and evaluate the likely significant effects on the environment of-

(a) Implementing the plan or programme; and

(b) Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.'

2.2.3 Regulation 13(1)

Regulation 13(1) requires that the Environmental Report must be prepared to accompany the draft LIP, and that both the draft LIP and Environmental Report be made available for consultation with the environmental bodies[2] and the public. Here 'the public' includes NGO's and other interested parties.

2.2.4 Regulation 12(3) defined in Schedule 2

Regulation 12(3) in Schedule 2 provides a list of information that needs to be included in the Environmental Report;

- An outline of the contents of the LIP
- Main objectives of the LIP
- The LIPs relationship with other plans and programmes
- The current and future state of the Borough's environment
- Existing environmental problems relevant to the LIP
- Environmental characteristics of the area and any environmental protection objectives set
- Likely significant environmental effects of the LIP
- Alternative options for the LIP
- Mitigation measures to prevent, reduce or offset any adverse effects of the LIP
- Description of monitoring measures

This list forms the basis of the template in chapter 3.

2.3 Format of the Environmental Report

The SEA Regulations do not specify the format of the Environmental Report, purely its contents and role. It simply needs to be a clearly distinguishable text. In practice it is likely to be a separate document from the LIP. However, the opportunity exists to examine other formats and ways of presenting the information. The template in chapter 3 is simply one option.

The key issue when presenting the required information in the report is to focus on the readers. The readers include the consultation bodies, the public and other stakeholders and interested parties. Some of these readers may not have the same level of technical understanding as the Borough staff who write the report. Others may also have less local knowledge.

The Environmental Report should make use of a range of styles and methods to present information including:

(i) Maps to indicate the geographical extent.

(ii) Graphs to show trends in baseline data.

(iii) Tables, for example to lay out SEA objectives or other relevant plans and programs.

(iv) Text, for the remainder of the document. The terminology chosen should be clear and simple, in order to maximise the potential readership.

[2] English Nature, Environment Agency, Countryside Agency, English Heritage

3 Template for a Borough's Environmental Report

Table 2 below provides a template for a Borough's environmental report. The left column of the table provides a possible chapter heading. The right column of the table explains possible content for the corresponding chapter shown in the left column.

Table 1: LIP Environmental Report Template

Chapter Heading	Contents
Non Technical Summary	**A summary of the Environmental Report** *This could be a separate document to facilitate wider readership.*
1 Introduction	**SEA and the Regulations** **The SEA process and stages completed to date** *Plus who conducted the SEA e.g. departments involved, consultants, etc.* **The Environmental Report and its aims**
2 The Local Implementation Plan	**Outline of the LIP** **LIP objectives set** **Relationship of the LIP to other plans and programmes** *LIPs should refer to the MTS and other Mayoral and Borough plans and programmes which affect, or are affected by, the LIP.*
3 State of the Environment	**The study area** **Review of other plans and programmes** *The review should help identify any existing environmental protection objectives.* **The environmental baseline** *Need to state the current and likely future baseline for each of the following issues to show that they have been considered; Biodiversity, flora and fauna, Population and human health, Soil and water, Air, Climate change, Material Assets, Cultural heritage (incl. archaeology and architecture), Landscape & Townscape, Interrelationship of the above issues.* **Existing environmental problems** *Identification of opportunities is also useful.* **SEA Objectives** *These should be linked to the problems and opportunities and results of the review of other plans and programmes.*
4 Alternative Options	**Need for alternative options** **Development of options** **Scoping** *Outcome of initial consultation with stakeholders on the scoping*

	report, and details of the process of identifying which alternative options to take forward for detailed assessment. **Issues likely to be significantly affected by LIP options** *In practice few issues are likely to be significantly affected by the LIP options and therefore the majority of issues will not require detailed assessment in the next stage.*
5 Assessment of Significant Effects	**Methodology** *See supplementary advice note on significance for help. Any problems and difficulties should be acknowledged in the report.* **Assessment of options** *This will need to be done for each alternative and on each issue likely to be significantly affected e.g. noise, air, human health, etc. Both the significant beneficial and adverse effects should be assessed.*
6 Mitigation	**Mitigation measures** *Mitigation, including measures to prevent, reduce and offset effects, are only required for significant adverse effects of the LIP options.* **Timing** **Responsibilities** *To help ensure that realistic mitigation measures are proposed it may be useful to indicate timing and responsibilities for implementing mitigation.*
7 Monitoring	**Monitoring measures** *Monitoring is required for any significant environmental effect with view to undertaking remedial action on any unforeseen adverse effects. This section should describe monitoring measures.*
8 Next Steps	**Consultation** *This section could include; aims of consultation on the LIP and accompanying Environmental Report, questions for consultees, the intended procedure for considering consultation responses, and contact details for consultation responses.* **Adoption of the final LIP** **SEA Statement** *Brief details on the role of the SEA Statement would be useful.*

Key to shading:

	Information already collated for Scoping Report, if produced
	New sections necessary to complete the Environmental Report

4 Quality Assurance of the Environmental Report

Quality assurance relates to two aspects of SEA in particular;

- The adequacy of the Scoping Report, Environmental Report or SEA Statement
- The adequacy of the process and the degree to which environmental issues have been integrated into the plan

The 2003 European Commission guidance to accompany the SEA Directive focuses on the first issue. The practical experience gained from the EIA Directive in relation to the poor quality of environmental statements highlighted the need for specific requirements in the SEA Directive to try and prevent this from occurring with SEA Environmental Reports.

Article 12(2) states; *"Member states shall ensure that environmental reports are of a sufficient quality to meet the requirements of this Directive and shall communicate to the Commission any measures they take concerning the quality of these reports."*

The ODPM has stated that as part of good planning practice, individual authorities are responsible for ensuring the quality of their publications.

Table 4 provides a checklist against which the adequacy of the Environmental Report for LIPs can be checked. Alternatively, SEA Review criteria have been developed by IEMA for use by individual authorities for checking the quality of the Environmental Report. See www.iema.net.

Table 3: Quality assurance checklist for a LIP Environmental Report
Source: Appendix 6 of DfT2004, amended.

Aspect of LIP Report/ Process	Items to check
Objectives and context	The LIPs purpose and objectives are made clear. Environmental issues and constraints, including local, national and international environmental protection objectives, are considered in developing objectives and targets. SEA objectives, where used, are clearly set out. Indicators and targets are defined where appropriate. Links with the MTS, the London Plan and other Borough plans and programme are identified and explained.
Scoping	Authorities with environmental responsibilities are consulted in appropriate ways, and at appropriate times, on the content and scope of the Environmental Report. The assessment focuses on the important significant issues. Technical, procedural and other difficulties encountered, such as technical deficiencies or lack of know-how, are discussed. Assumptions and uncertainties are made explicit. Reasons are given for eliminating issues from further consideration.
Alternatives	Realistic alternatives are considered for key issues, and the reasons for choosing them are documented. Alternatives include 'do minimum' and/or 'business as usual' scenarios, wherever

	relevant. The environmental effects, both adverse and beneficial, of each alternative are identified and compared. Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained. Reasons are given for selection or elimination of alternatives.
Baseline information	Relevant aspects of the current state of the environment and their likely evolution without the plan are described – i.e. the "without the plan" scenario. Environmental characteristics of areas likely to be significantly affected are described. Difficulties such as deficiencies in data or methods are explained.
Identification and evaluation of likely significant effects	The Report considers and identifies effects on: • The topics listed in the SEA Regulations. These are biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape. • Any other topics considered relevant in the MTS or other Borough plans e.g. accessibility and severance. Both positive and negative effects are considered. The duration of effects (short, medium or long-term) is addressed. Likely secondary, cumulative and synergistic effects are identified where practicable. Inter-relationships between effects are considered where practicable. Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds. Methods used to evaluate the effects are described. Sources and levels of uncertainty in the assessment are identified and reported. Wider sustainability issues are also considered.
Mitigation measures	Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated alongside consideration of their costs and feasibility. Issues to be taken into account in project EIAs are identified.
Format	Is clear and concise in its layout and presentation. Uses simple, clear language and avoids or explains technical terms. Uses maps and other illustrations where appropriate. Explains the methodology used. Explains who was consulted and what methods of consultation were used. Identifies sources of information, including expert judgement and matters of opinion. Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main alternatives considered, and any changes to the plan resulting from the SEA.

Consultation	The SEA consultations are conducted as an integral part of the plan-making process. Authorities with environmental responsibilities and the public likely to be affected by, or having an interest in, the plan are consulted. This consultation should be in ways, and at times, which give them an early and effective opportunity to express their opinions on the draft LIP and Environmental Report. These parties must have sufficient time to provide their responses. There must be sufficient time for the responses to be considered.
Monitoring measures	Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA. During implementation of the LIP, monitoring is used where appropriate to make good deficiencies in baseline information in the SEA. Monitoring enables unforeseen adverse effects to be identified at an early stage. These effects should include any predictions which prove to be incorrect. Proposals are made for action in response to significant adverse effects.

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