

Sustainability Appraisal and Public Examination of a Regional Spatial Strategy

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ABSTRACT

UK spatial planning guidance now recognises the importance of engaging stakeholders in appraisal processes at an early stage in the plan-making process. Regional Planning Authorities are required to consult proactively with a wide range of stakeholders on both the development of planning policy and the sustainability appraisal of that policy. However, there is no clear indication as to *how* they might go about this process, other than to confront the various stakeholders with a *Sustainability Appraisal Report*. Participation in Sustainability Appraisal therefore still relies on reaction to a technical appraisal of an existing plan – and in this situation stakeholders might lack the incentive to participate. More thoughtful ways need to be devised to involve people in the sustainability debate – so that spatial policy more accurately reflects their knowledge and aspirations. The focus of this paper is to investigate ways in which Sustainability Appraisal of spatial plans can be made more accessible and transparent within the context of wider governance mechanisms. Of particular interest is the Public Examination of a Regional Spatial Strategy. The following research questions attempt to address the gaps in knowledge:

1. How can the *quality and extent of engagement* of stakeholders be improved, so that policy approaches delivered via Sustainability Appraisal more effectively *reflect their ambitions*, whilst continuing to meet the objectives for sustainability ?
2. How can the *sustainability issues* that might form the basis of discussions in a proactive engagement of interests be identified, and how can these issues be framed within a *contextual setting* that is meaningful to a range of stakeholders ?
3. What mediatory techniques can be identified to accommodate the various frames of reference that arise in potentially conflict situations ?

Key words: Sustainability Appraisal, Stakeholders, Regional Plans

INTRODUCTION

Sustainability Appraisal generally follows an approach whereby the performance of a strategy, policy or plan is gauged in relation to a series of aspirational objectives for sustainable development. It represents a process of dealing with often-conflicting environmental, social and economic objectives. The requirement to assess the ability of a spatial plan against objectives for sustained economic development and a social perspective, whilst at the same time satisfying its ability to deliver on environmental provisions, represents a very complex situation. This contrasts with Environmental Impact Assessment and Strategic Environmental Assessment, where potential impacts are evaluated in relation to environmental baseline conditions only. The UK Government's strategy for sustainable development (DEFRA 2005) adopts as a key principle the integrated treatment of economic, environmental and social issues. Planning authorities are therefore required to have regard to economic, environmental and social considerations when preparing development plans. Planning Policy Guidance, Planning Policy Statements, and other good practice publications have reflected this approach. The Planning and Compulsory Purchase Act (HM Government, 2004) specifies that Sustainability Appraisal is mandatory for all Regional Spatial Strategies¹. UK guidance on Sustainability Appraisal has been developing progressively since the turn of the millennium (see for example DETR, 2000 and ODPM, 2003). In an attempt on the one hand to acknowledge the requirements of the Strategic Environmental Assessment Directive (European Commission, 2001), and on the other hand to advocate the UK government's desire for Sustainability Appraisal, the guidance had tended to pursue a duplicitous role. *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks* maintains this notion:

The requirement to carry out a Sustainability Appraisal and a Strategic Environmental Assessment are distinct. However, it is possible to satisfy both through a single appraisal process. This guidance is intended to ensure that Sustainability Appraisals meet the requirements of the SEA Directive, and it widens the Directive's approach to include social and economic as well as environmental issues. (ODPM, 2004, p9)

The Guidance references the Directive throughout, so that its requirements can be addressed during the course of a Sustainability Appraisal. Nevertheless ambiguities remain. For example, the guidance on Sustainability Appraisal of Regional Spatial Strategies identifies the need to predict significant effects of preferred options in social, environmental and economic terms (paragraph 2.1.39). However, in addressing the *mitigation* of any adverse effects, paragraph 2.1.45 fails to make clear whether mitigation might extend to adverse effects on the economy or society.

¹ Note that Scotland has opted to confine the mandatory use of SEA to the assessment of environmental effects only (Jackson & Illsley, 2005).

GUIDANCE ON SUSTAINABILITY APPRAISAL OF REGIONAL PLANS

The guidance on appraisal of Regional Spatial Strategies mirrors that of the appraisal of local plans, referring throughout to the process outlined in PPS11. It begins with collecting the baseline data and identifying the corresponding sustainability issues. The appraisal methodology must be agreed with the stakeholders. This provides evidence against which the effects of the Regional Spatial Strategy can be assessed and monitored. Sustainability issues should be identified *by consultation with authorities with social, environmental and economic responsibilities, other stakeholders and the public* (ODPM, 2004). Finally, a framework of sustainability objectives, targets and indicators must be defined with input from key stakeholders. It may be possible to drop some of the options, and to map the development of the preferred options into a final version of the Sustainability Appraisal Report, along with their significant effects. The Report is produced by the Government's consultants, who are currently *Environmental Resources Management*. Their methodology is to present the process, findings and outcomes of the appraisal processes that were followed throughout the production of the Regional Spatial Strategy. This complies with Government guidance (ODPM 2004; ODPM 2003), which indicates a series of stages and tasks to be accomplished.

Summary of Stages

Stage 1: Setting the context and establishing the baseline:

- Task 1.1 Identify relevant plans and programmes, related to the Regional Spatial Strategy
- Task 1.2 Devise Sustainability Appraisal objectives, indicators and targets
- Task 1.3 Collect baseline data, including data on likely future trends
- Task 1.4 Identify issues and problems arising from the Regional Spatial Strategy

Stage 2: Deciding the scope of SA and developing alternatives:

- Task 2.1 Identify options for dealing with the plan issues
- Task 2.2 Choose preferred alternatives
- Task 2.3 Prepare and issue *Scoping Report*
- Task 2.4 Consult 'relevant authorities' and stakeholders on *Scoping Report*

Stage 3: Assessing the effects of the draft RSS:

- Task 3.1 Predict and evaluate effects of the plan on assessment objectives
- Task 3.2 Promote mitigation measures
- Task 3.3 Prepare Sustainability Appraisal Report

Stage 4: Consulting on the draft RSS and Sustainability Appraisal Report:

- Task 4.1 Present results of *Sustainability Appraisal Report*
- Task 4.2 Seek inputs from public and authorities
- Task 4.3 Take consultation into account
- Task 4.4 Show how results of the *Sustainability Appraisal Report* were accounted for in Regional Spatial Strategy

Table 1: Stages and Tasks of the Sustainability Appraisal (ERM, 2005)

CASE STUDY: PARTICIPATION IN SUSTAINABILITY APPRAISAL FOR THE REGIONAL SPATIAL STRATEGY FOR NORTH EAST ENGLAND

The Sustainability Appraisal Report (ERM, 2005) states that in addition to the four statutory consultees (Environment Agency, English Nature, English Heritage and Countryside Agency), consultation was also carried out with the members of The Regional Round Table for Sustainable Development (Sustaine) and the North East Environment Forum. It can be seen that the statutory consultees are all represented on the Environment Forum (fig. 2). Sustaine membership overlaps considerably with that of the Forum, but contains fewer environmental representatives and is supplemented by the Voluntary Organisations Network, the Health Development Agency and a University Institute. It is apparent that Sustaine has struggled to embrace the private sector.

Figure 2 illustrates that environmental concerns were extensively represented in the Sustainability Appraisal consultation process, but social and economic stakeholders had more limited input. The Local Authorities and County Councils provided the main source of knowledge and expertise on policy. This implies a technical or rationalist approach, reducing the incentive for social and economic stakeholders to become involved. This methodology searches for goals that can subsequently be translated into policy design and implementation. An alternative is the communicative / interpretative approach that explores social processes through which meanings are created, notions of consensus might be generated, and policy systems developed (Healey, 1999).

The Strategic Environmental Assessment Directive (European Commission, 2001) advocates a systematic assessment of causes and effects, including the identification of impacts that will subsequently be monitored by indicators. This type of blueprint planning reflects directly the technical-rational models of the 1950s (Myerson and Banfield, 1955). In contrast, Sustainability Appraisal should assess the ability of a plan to deliver on a complex variety of often-conflicting environmental, social and economic objectives. It is the contention of this research that the transition from Strategic Environmental Assessment to Sustainability Appraisal therefore represents more than just a broadening in the scope of the assessment criteria. A shift in complexity has occurred, from the single dimension of Environmental Assessment of plans towards the multi-dimensional Sustainability Appraisal of plans. In particular, the introduction of social and economic criteria increases the scope for conflicts of interest during the assessment of plan performance, representing a step-change in complexity and uncertainty.

The Sustainability Appraisal Steering Group comprised two officers from Government Office, the North East Regional Assembly, and the Environment Agency; and one officer from the Regional Development Agency (ONE North East), English Nature,

Newcastle City Council and Derwentside District Council, along with the Environmental Resources Management consultant. There was consequently a considerable overlap between the constituent members of the four reference groups involved in the Sustainability Appraisal process ie. the Statutory Consultees, North East Environment Forum, Sustaine (North East Assembly, 2002) and the Sustainability Appraisal Steering Group. Despite the consultant's claim that a *wider range of stakeholders and experts* participated in the sustainability process (ERM, 2005), in reality it was limited to:

North East Environment Forum (NEEF Secretariat, undated)	Sustaine (Sustaine, 2004)
Countryside Agency* Campaign for the Protection of Rural England Durham County Council	Durham County Council
English Heritage*	
English Nature*	
Environment Agency* (Secretariat)	Environment Agency
Environmental Industries Federation	
Forestry Commission	
Friends of the Earth	
Government Office North East	Government Office North East
Groundwork UK	Groundwork UK
National Trust	
North East Biodiversity Forum	
North East Assembly	North East Assembly
North East Wildlife Trusts	
North East Community Forests	
Northumberland County Council	
Northumberland National Park	
Northumberland Strategic Partnership	
Northumbrian Water	Northumbrian Water
One North East	One North East
Royal Society for the Protection of Birds	Royal Society for the Protection of Birds
	Association of NE Councils
	Centre for SD (Secretariat)
	Health Development Agency
	Sustainable Cities Research Institute
	Voluntary Organisations Network

Table 2: Membership of North East Environment Forum (NEEF) and Sustaine
(* Statutory Consultees for the Regional Spatial Strategy)

The constituent groups had so many members in common, it was essentially the same people playing different roles in various situations. This militated against wider participation. Of these players, most were either part of the North East Environmental Forum or Sustaine or both, and they were not even consulted at the outset of the process. They were only involved when the key sustainability issues had already been determined by the consultants and needed elaboration for the final version of the Sustainability Appraisal Report. This formed part of a web-based Document Centre containing national and regional policy background documents; and a full set of public responses to the Consultation Draft of the Regional Spatial Strategy, arranged by reference to Policies 1-60. Unfortunately, there was no separate category for comments on the Sustainability Appraisal Report, as these were apparently integrated into the Policy categories. The Document Centre provided evidence for the Examination in Public.

Regional Spatial Strategy Examination in Public

The Examination was conducted over a period of twenty days during March-April 2006. It was structured in the form of eight *Matters* comprising Vision, Spatial Strategy, City Regions & Rural Areas, Economy, Communities/Centres & Housing, Environment & Resource Management, Transport, and finally Monitoring. Each of these was divided into subsections ranging from only one subsection in the case of *Monitoring*, to thirteen subsections in the case of *Communities/Centres & Housing*. Each of the subsections of the Examination was qualified by a series of questions that had been prompted by the response to the formal consultation draft of the Regional Spatial Strategy. The aim of the Examination was to discuss in public, issues about which the First Secretary of State needs to be more fully informed. Although the primary objective was to test the soundness of the proposed Regional Spatial Strategy, it was pointed out that only selected matters would be raised and it was not an examination of the whole submission, nor was it a hearing of all the objections. The Panel secretary noted that *participants had been selected to represent a range of views and interests* (Panel Secretariat, 2005). This involved 98 different participants – some for only single issues, others for more than one. The list of participants had been drawn up in consultation with the North East Assembly and Government Office North East. The main criteria for selection were:

- *The significance of the contribution that they can be expected to make to the discussion, having regard for their expertise and/or the views already expressed.*
- *The need for a balance of the views expressed*
- *The need to ensure that the number of participants invited did not preclude meaningful debate* (Panel Secretariat, 2005).

Sustainability Appraisal and Development Options were considered together on the afternoon of the first day only. Thus both of these issues were dispatched in less than 3% of the Examination period. The afternoon was attended by 4 panel members, 12 participants (21 contributions) and 54 observers. Of the participants, 3 were statutory consultees anyway, 5 others were members of either the North East Environmental Forum or Sustain, or both; and had therefore been consulted already as part of the process. Therefore, just 4 represented additional consultation, and one of those merely made a detailed point about a specific locality. The 3 new active parties to the process were:

- North East Combined Transport Activists' Roundtable
- Home Builder's Federation
- Royal Town Planning Institute

This does not appear to be a particularly representative or coherent group.

As might be expected, the statutory consultees were generally supportive of the process. English Nature noted that the Sustainability Appraisal had helped to shape the policy development process. The English Heritage view was that given the timescale, a realistic approach to the appraisal process and consultation was taken, although the process could be improved; and the Environment Agency stated that the Sustainability Appraisal had identified risks inherent in the Regional Spatial Strategy. However, English Heritage also commented that there is a notion of economic and population decline being environmentally damaging. This was contradicted by the National Trust (of NEEF) who said that economic growth might cause environmental damage. Both of these views were equally speculative and no evidence was presented to support either. The national Trust continued that the Strategic Environmental Assessment is supposed to be an integrated process. The contention was that the options failed to explore environmental effects... waste, energy, and greenhouse gases. This was quite a serious criticism of a fundamental part of the Sustainability Appraisal. The Campaign for the Protection of Rural England (of NEEF) observed that a qualitative approach should be achieved through the Sustainability Appraisal process, in which mechanisms for economic growth can be developed that also minimise environmental impact. The implication of this statement is that the Sustainability Appraisal process did not address this issue. The North East Assembly (of NEEF and Sustaine) tried to re-assure the panel by stating that the process was steered by Sustaine and carried out by *Environmental Resources Management* in accordance with prevailing guidance and the options were considered at the North East Environment Forum. It also suggested that the Sustainable Appraisal followed an iterative process, which started with a Scoping Report. Government Office North East (of NEEF and Sustain) was more measured. It proposed that a revised Sustainability Appraisal Report might be produced that incorporates Government advice on good practice in involving community groups.

This raised questions as to how and indeed if, community groups had been involved in the exercise that had already been undertaken. However, the most challenging criticisms came from Friends of the Earth (of NEEF). They pointed out that the requirement for the Sustainability Appraisal to be iterative and participatory had not been achieved. Also, it had not been demonstrated how the recommendations in the Sustainability Report had been taken into account. In addition, The Sustainability Development Strategy was not referenced in the Regional Spatial Strategy, the number of options was not sufficiently large and it is not clear how community involvement had taken place. The Sustainability Appraisal was further criticised for lack of conclusive outcomes and lack of strategy to deliver environmental protection. The Chair of the Panel recommended that Government Office North East contemplate a legal challenge of Friends of the Earth and a Judicial Review is still an option as provision has now been made for such action (European Commission, 2001). Friends of the Earth had already made most of these criticisms in a letter to the North East Assembly and the Secretary of State in September 2005.

The 3 remaining participants recognised the concerns. The North East Combined Transport Activists' Roundtable requested that *real* people be involved in the Regional Spatial Strategy Appraisal. There was more than an implied criticism that the community had not been engaged. The Home Builder's Federation made it clear that a balance between social, economic and environmental factors should be the principal aim of the Sustainability Appraisal, not a testing of extreme cases. The Royal Town Planning Institute added that if insufficient detail had been explored in assessing the different options, then the strategy that has emerged might not be effective (Porter, 2006). Following this account of the proceedings, it might appear surprising that the *Panel were satisfied that the resulting Sustainability Appraisal was sufficiently inclusive and allowed consideration of a range of stakeholder views* (Examination in Public Panel, 2006).

Reflection on Existing Process

It is apparent that the technical or rationalist approach, as encouraged by the European Directive, can enable the Strategic Environmental Assessment to function. In this country Sustainability Appraisal has been added while all the mechanisms are still related to the Strategic Environmental Assessment. This brings into question the Government's assertion that both can be satisfied through a single appraisal process (ODPM, 2004). In the North East England Regional Spatial Strategy Case Study, environmental concerns were quite extensively represented but social and economic stakeholders had much more limited input. The consultees were all members of the North East Environmental Forum and / or Sustaine; and even they were not involved until the consultants had already established the key sustainability issues. In addition, it is evident that Sustaine in particular struggles to embrace the private sector.

The Examination in Public exposed many of the deficiencies in the process. It is debatable whether Sustainability Appraisal and Development Options were offered sufficient attention, as they occupied less than 3% of the Examination period. There were only 12 participants – 3 were statutory consultees and 5 were members of the North East Environmental Forum or Sustaine or both anyway. This left only 4 new parties to the process. Friends of the Earth summarized the weaknesses most succinctly. They stated that the Sustainability Appraisal was not iterative nor sufficiently participatory; and it had not been demonstrated how recommendations of the Sustainability Report had been taken into account. They added that the number of options was insufficiently large and it was not clear how community involvement had taken place.

TECHNICAL OR COMMUNICATIVE APPROACHES

The reason for the diminishing appropriateness of a technical approach is to some extent common sense. As the complexity of the aims for sustainable development increase, so it becomes increasingly difficult to make rational choices, based upon straightforward logic and cause-effect relationships. At this point, opinions, values, preferences and motives will inevitably begin to dominate the appraisal process. Uncertainty consequently prevails. The theoretical proposition of this research is therefore that a shift may be needed from a technical approach for Strategic Environmental Assessment, towards a communicative approach for Sustainability Appraisal - which sees the relationships between actors, stakeholders and citizens and the inter-subjective development of ideas as the central element of planning in a complex and uncertain world. This research takes the form of a *comparative puzzle* (Mason, 2002) between two contrasting models for the appraisal of spatial plans. The technical model is well established (European Commission, 2001) in terms of both theory and guidelines; but a communicative model has not so far been explored. Some outline components for a communicative model are thus proposed in this paper, one of the key aspects of which is the role of actors in the identification of barriers to more sustainable practice.

Communicative Planning Theory provides an equivalent approach to understanding the workings of *governance processes*, grounded in observations of planning practice (Healey, 1999). The ambition of communicative planning theory (Healey, 1997; Innes, 1995) is that through learning how to collaborate, a more broadly based mutual understanding can be developed between actors. The methodology suggests that policy development is achieved largely through social interaction, and seeks to provide techniques to develop creative interaction, which will eventually lead to the transformation of governance culture. The starting point might be facilitated by a process called *actor consulting* (De Boer and De Roo, 2001), which seeks to clarify

fuzzy² planning notions such as sustainability. This provides a theoretical perspective on a proactive technique for data collection and analysis, whereas most other participation techniques (e.g. Wates, 2000) tend to focus on practical guidelines. It is a branch of communicative planning theory that exploits the proactive *contributions of actors* to reveal solutions to planning problems where mutual understanding of underlying concepts is unclear. It involves interviews with a wide range of actors who have various environmental, economic and social interests, and who have direct experience of a particular policy arena. The notion of *capacity building* within a particular governance environment also appears to offer promise. In the context of this research, capacity building refers to a change in organisational arrangements or the provision of a new facility, in support of more sustainable approaches to spatial planning. The contributions of actors towards sustainability might be analysed therefore to develop ideas for direct regulation, fiscal (or indirect) regulation, self-regulation, or capacity building instruments. The end result reflects in essence the need to use a variety of means to solicit the views of a wide range of actors and competent observers within the prevailing governance environment, and to take action via a variety of mechanisms (not just the spatial plan) to reflect their input. As Forester (1989, p 119) put it:

It becomes clear that planning problems will be solved not solely by technical experts, but also by pooling expertise and non-professional contributions; not just by formal procedure, but also by informal consultation and involvement; not predominantly by strict reliance on data bases, but also by careful use of trusted resources, contacts, and friends; not mainly through formally rational management procedures, but through internal and external politics and the development of a working consensus; not by solving an engineering equation, but by complementing technical performance with political sophistication, support-building, liaison work – all this, organizing – and, finally, intuition and luck.

In Sustainability Appraisal as it is currently practiced, actors have no proactive role to play because the appraisal process is reactive in nature. Although the guidance advocates that the process of sustainability appraisal should be carried out throughout the plan development process, appraisals remain in the hands of technicians and will continue to react to the existing plan. *Stakeholders and the public* (ODPM, 2004) are given the opportunity to react to the appraisal process via a formal process of consultation. The guidance does not acknowledge that citizens might find it difficult to engage with such a technical exercise. In this proposal for Sustainability Appraisal, a consultation process with knowledgeable actors provides the initial ideas for input to policy. Although the actors are selected on the basis of their being reasonably representative of the interests of the wider population,

² "Fuzzy" is an adjective increasingly used in abstract theoretical planning to describe the illusive nature of notions such as sustainability

competent observers are brought into play to strengthen the democratic process and to verify / update the policy ideas from the standpoint of a wider knowledge base and geographic perspective. The proposal also pays specific attention to the *position* (Giddens, 1984) of both the actors and the competent observers, and to achieving a balanced mix of these parties. In the communicative model, the aim is to establish how common frames of reference might be built as a platform for future interaction, so that the process itself can play a role in capacity building. The current Appraisal process is linear and has fixed goals. The process as proposed, retains the goal-based approach but becomes more reflexive about its goal-orientation, allowing an opportunity to question and develop the sustainability goals as well as spatial policy. Finally, in the present Sustainability Appraisal methodology, *expert* knowledge influences policy-making behind closed doors, and makes information available for comment by stakeholders and the public. The intention is that input to policy from a wide range of practical experience and professional skills is a positive move towards facilitating the processes of interaction. The following figure compares the technical and communicative approaches to Sustainability Appraisal.

Technical				
Causal Features	Role of actors / stakeholders / citizens	Opportunity for interaction	Goals for sustainability	Facilitation and decision-making
<p>Relationship between cause and effect is clear</p> <p>Analysis is based on assumption of certainty</p> <p>Unsuitable for analysing complex planning cases: so can it be considered suitable for Sustainability Appraisal?</p>	<p>There is no role for the proactive engagement of actors</p> <p>Stakeholders react to output of the technical appraisal process via a consultation process.</p> <p>Citizens will find it difficult to engage with such a technical exercise.</p> <p>Groups that are representative of the wider population might be involved.</p>	<p>Appraisal process has no role for interaction between actors or stakeholders</p> <p>The focus is on information provision, to which stakeholders react</p>	<p>Appraisal process is linear and has fixed goals</p> <p>Appraisal might come too late to influence policy priorities</p>	<p>“Expert” knowledge influences policy-making behind closed doors</p> <p>Professional skills are centred on technical-analytical expertise</p>

Communicative				
Causal Features	Role of actors / citizens/competent observers	Opportunity for interaction	Goals for sustainability	Facilitation and decision-making
<p>Relationship between cause and effect is generally unclear.</p> <p>Implicit acceptance of uncertainty prevails</p> <p>Can be used in analysing complex planning cases</p>	<p>An initial proactive consultation process enables actor knowledge to provide ideas for policy that overcome barriers to more sustainable practice.</p> <p>Citizens will still find it difficult to engage</p> <p>Competent observers representative of the wider population will be <i>actively</i> engaged to verify / update policy ideas</p>	<p>Mediation process may keep actors apart.</p> <p>However, common frames of reference can be identified to encourage further interaction between actors.</p> <p>This might provide a basis for wider debate among the actors and the competent observers</p>	<p>Sustainability goals must still be set in advance.</p> <p>However the goals will be questioned during the appraisal process, allowing opportunity to develop the goals as well as the policy.</p>	<p>A wide range of practical experience influences new plan policy in a forum that is mediated by the planners</p> <p>Professional skills change to mediation and communication to facilitate interaction</p>

Figure 1: Comparison of the two approaches to Sustainability Appraisal of spatial plans

SUMMARY

Planning theory covers a range of approaches, with technical to communicative models at the respective extremes of the spectrum. The technical / rationalist ethos searches for objective principles through which policy goals can be identified, and subsequently translated into policy design and implementation. The communicative / interpretative school explores social processes through which meanings are created, notions of consensus might be generated, and policy systems developed (Healey, 1997 and 1999). The existing method of Sustainability Appraisal falls within the technical / rationalist approach to planning, by analysing an existing plan in *reactive* mode. The proposed method *actively* seeks participative input from knowledgeable actors to identify the issues. This necessitates *mediation* by the planning authority or an appointed agent to co-ordinate the collection of data from the actors. Gaps between the actors' perception of the present situation and the desired outcome, allow ideas – and only ideas at this stage – to be developed. The approach accommodates the concept of *governance* by acknowledging the opportunity to develop self-regulation or capacity-building instruments, in addition to the direct regulation accommodated in the spatial plan. Although the actors are selected on the

basis that they are broadly representative of the wider population, competent observers are subsequently consulted as a means of bringing into play a wider spectrum of knowledge and geographic interest. This helps to refine the package of regulatory ideas. The aim is to build some initial ideas that transcend the conflicts of interest embedded in the differing frames of reference. This might help to build social capital (Putnam, 1995) in support of policy development in the longer term. Mediation (Hague, 2003) takes place until the actors begin to communicate more freely. In conclusion, the theoretical perspective adopted for this research is one of attempting to develop and influence the sustainability of planning policy, by re-orienting the appraisal process of spatial policy away from a technical-rational process of object-oriented analysis that focuses on cause-effect relationships and logical interaction between policies. Instead, it is attempting to move the appraisal of plans towards a communicative process, focused on the role of actors and institutions, where uncertainty is an acknowledged principle. It therefore provides a framework that is likely to lead to embracing diversity of views in a more flexible manner. This is a more demanding approach for planners but it could improve the credibility of the process.

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