Progressing Environmental Impact Assessment? Promoting an Integrated Assessment Approach

Following the inclusion of ‘population and human health’ in the newly amended Town and Country Planning (EIA) Regulations 2017 (and equivalent regulations for other development types), this article seeks to explore the viability of an integrated assessment approach whereby the process of EIA takes a robust and holistic form inclusive of other assessments such as: Health Impact Assessments (HIA), Social Impact Assessments (SIA), Equality Impact Assessment (EqIA) and economic assessment tools such as Cost Benefit Analysis (CBA). Often, these would otherwise be undertaken independently to an EIA or in addition to an Environmental Statement (ES).

The principle concern is whether the outcomes of EIAs (and the additional documents such as transport, social and economic assessments provided alongside an ES) are providing plan-makers and decision-makers with appropriate and comparable information to meet the end goal of sustainable development. The National Planning Policy Framework (NPPF) acts as the UK’s policy vehicle for facilitating sustainable development stating: “Sustainable development is about positive growth – making economic, environmental and social progress” (Ministerial Foreword), as reflected in the simple image below, and is centred around “a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking” (paragraph 14).

An integrated assessment that not only covers the environment but also includes appropriate social and economic analysis could supply stakeholders and decision-makers with information on the full scope of the potential impacts associated with a project (rather than just those traditionally covered in EIA). However, one of the key criticisms of ESs is that they can be extremely lengthy which can detract from the assessment itself. Adding further chapters and depth without streamlining the existing EIA process would most likely deem an integrated approach untenable unless a change of mindset and methodology is instilled.

Integration is most successfully achieved through an inter-disciplinary approach whereby the specialists concerned work closely together, informing each other’s work and thus creating a holistic knowledge-sharing approach. This has the potential to increase the effectiveness of an assessment by facilitating learning and creating a shared understanding of the different strands of potential impacts a project may have upon sustainable development targets.
Much as the processes of Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) (in some circumstances known as ‘Integrated SAS’ due to the inclusion of HIA, EqIA amongst others for example) take into the account the multidimensional nature of impacts realised at the policy and programme level, integrated assessment could improve the comprehensive understanding of impacts that can occur at the project level. Proponents of integrated assessment would argue that the complexity of the issues a project creates requires an integrated approach to ensure that principle feedbacks, interactions and direct and indirect significant effects are not unintentionally omitted from the assessment.

The historical roots of EIA are in the need for environmental advocacy to counteract some of the arguments favouring development. There is a concern that an integrated approach would likely result in trade-offs between the social, economic and environmental aspects before decision-makers view applications which are likely to warp the path to a transparent and informed decision. However, if this is done appropriately it could actually make decision-making better and easier. A focused scoping procedure at the beginning of the planning process could be key to achieving this goal. By starting with the objective of sustainable development and only then identifying particular sustainability issues that warrant additional assessment in any given context. However, scoping is not mandatory under current UK legislation, resulting in this process often being overlooked.

A positive step in the right direction may include cumulative effects and integration workshops whereby all disciplines (environmental, economic and social) are involved in discussion around potential project impacts, interactions and mitigation measures to maximise the overall benefits and minimise any adverse effects with the goal of achieving sustainable development. Only once this event has occurred would the overall picture be presented to the client during the design phase of a development. The preparation of simple sustainability summary graphics such as that shown below could also be useful to pick out the key areas of project sustainability performance.

Overall, it would be fair to say that an integrated approach could significantly increase the efficacy of a project-level assessment and subsequently aiding the decision-making process. However, successful implementation of an integrated approach would require a change in professional mindset and working patterns, coupled with the fact that ESs are already under scrutiny for their excessive lengths. However, achieving sustainable development could be boosted by at least a more unified approach of the impact assessment tools currently available in conjunction with cumulative workshops detailed above for example.

*Ben Twiss, Environmental Consultant, Arcadis, November 2017.*