

Integrating strategic assessments – what works and is it the right approach?

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Introduction

Sustainability Appraisal (SA) in the UK, incorporating Strategic Environmental Assessment (SEA) and other forms of assessment, provides an opportunity for more informed decisions and greater progress towards sustainable development. Government guidance in England supports integration wherever possible¹. There are few examples as yet, but there can be significant advantages in integrating different forms of assessment. Practical examples are explored below; lessons learned are discussed and some conclusions made.

An Overview of Sustainability Appraisal

SA is a legal obligation² for key spatial plans in England and Wales, requiring assessment of their likely social, environmental and economic effects. SA incorporates the requirements of the European Union SEA Directive³.

SEA requires:

1. an Environmental Report on effects of the proposed “draft plan or programme”;
2. consultation on the draft plan and the accompanying Environmental Report;
3. taking assessment findings into account in decision making;
4. providing information on how the SA and consultation has been taken into account in the adopted plan; and
5. monitoring plan implementation and associated effects.

For the wider process of SA these environmental considerations include broader social and economic issues. Spatial plans, particularly revisions to Regional Spatial Strategies (RSS) and Local Development Documents (LDDs) account for the majority of plans and programmes subject to the SEA Directive in England (see Figure 1).

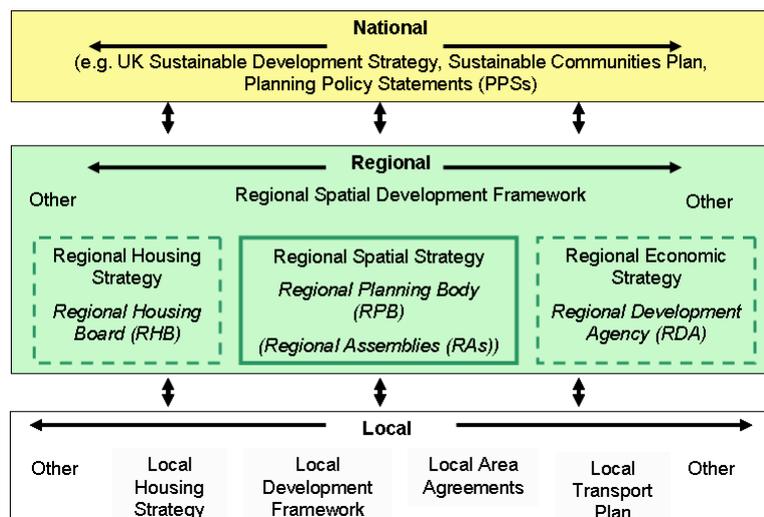
For spatial plans in England, SA also builds on existing national planning policy and a range of other assessments which together help to provide an evidence base for the development of the plan, including:

- strategic flood risk assessment
- open space assessment
- strategic housing land availability assessment
- landscape character assessment
- retail and leisure needs assessment
- economic and property market analysis

But what about other appraisals?

In addition to the requirements for assessments to provide an evidence base, there are also assessments that provide for an assessment of the plan *itself*. SA provides this assessment for sustainability as a whole but there are other assessment strands that are statutory or non-statutory ‘advocacy’ processes, for example:

Figure 1 - England Planning Context & Integration



¹ Particularly the SEA Practical Guide (ODPM et al, 2005); and the SA Guidance (ODPM 2005)

² Required by the Planning and Compulsory Purchase Act 2004 for Regional Spatial Strategies and certain Local Development Documents

³ Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”, and transposed in the UK through regulations *The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No. 1633)* and similar in Wales, Scotland and Northern Ireland

Statutory

- Strategic Environmental Assessment
- Equality Impact Assessment (race relations, disability discrimination, gender equality)
- Habitats Regulations Assessment⁴ (subject to screening)

Non-statutory

- Health Impact Assessment
- Equality (other 'strands' e.g. age, religion, sexual orientation, background, educational attainment etc.)
- Rural / urban proofing

The Habitats Directive requires that an appropriate assessment be undertaken for any land use plan (or project) which is likely to have a significant effect on a Natura 2000 network site (referred to as a Habitats Regulations Assessment (HRA)). Essentially whilst SA is a means of comparing options to inform and achieve the most sustainable outcome, HRA is a standard to be passed to ensure that the Habitats Directive is adhered to, so whilst the two can be integrated, they are more likely to be undertaken concurrently, utilising shared baseline information where appropriate.

Legislation⁵ in the UK obliges listed Public Authorities to eliminate unlawful discrimination and promote equality of opportunities. Equality Impact Assessment (EqIA) involves assessing impacts of policies, practices, regulation and services; identifying and considering mitigating actions; and monitoring. It has the potential to cover many of the 'social' elements of SA.

It is becoming increasingly common for planning authorities to approach these assessments in an integrated way, at least insofar as commissioning consultants is concerned, creating the so called 'Integrated Sustainability Appraisal'.

The integration of assessments is not without its critics. Some argue for a clear distinction between the aims of promoting sustainable development through SEA, as expanded to SA, and the promotion of good governance, whilst recognising that integration may contribute to the latter through greater transparency, improved efficiency, more joined up public policy and increased stakeholder engagement (Kidd and Fischer, 2007). Balance between emphasis on qualitative and quantitative methods of assessment is important, to ensure that the depth of analysis and topic(s) at hand are commensurate with the level of the relevant plan and potential significance of the issues involved. It is also important to ensure that the evidence-based approach of SEA is respected and balanced with other forms of assessment.

Choice of objectives and indicators in assessment is a key consideration, particularly the use of sustainable development objectives. These can be derived from stakeholder opinion, baseline assessment, 'backcasting', international principles and 'tiering'. A number of different approaches are required in working towards sustainable development (Hacking and Guthrie, 2006).

Kidd and Fisher (2007) use the example of the Integrated Appraisal Toolkit (IAT) developed by the North West Regional Assembly to illustrate the overlapping interests of the sustainable development and good governance aims and approaches to appraisal. They argue that the IAT example is useful but in answering the 12-question appraisal tool⁶, requires a good baseline understanding at varying levels; doesn't lend itself to consideration of alternatives; risks losing focus on different elements of a proposal; and lacks transparency.

Case Study 1 – North West England

Turning to practice, the North West Regional Spatial Strategy (RSS) is undergoing a review of its policies and as part of this review, the planning authorities have commissioned an array of assessments:

- SA / SEA;
- HRA;
- Health Impact Assessment;
- Equality Impact Assessment; and
- Rural Proofing.

Two of the processes (SA / SEA and HRA) have specific statutory requirements for consultation and report production. The SA process being a more mature, and arguably more onerous process, is generally used as the 'backbone' around which the other assessments take place. As the SA process was developed in line with the plan making process, this ensures a close link for all the assessments with plan preparation *and* the decision making process.

⁴ Undertaken in accordance with Article 6(3) and 6(4) of the Habitats Directive 92/42/EEC "on the conservation of natural habitats and of wild fauna and flora, and as transposed by The Conservation (Natural Habitats, & c.) Regulations 1994 and amendments

⁵ Race Relations (Amendment) Act 2000; Disability Discrimination Act 2005; Equality Act 2006

⁶ The 12 questions are based around themes, these are supplemented by a series of supplementary questions and 'hints'. See: <http://www.sdtoolkit-northwest.org.uk/toolkit/newsection.php?newcat=20>

The assessment of the RSS was integrated in two distinct ways, procedurally and substantively. The approach adopted in the North West was to carry out the assessments separately but linked to the SA and therefore the plan preparation process. Separate reports were produced, each fairly lengthy - the SA Report was 400 pages, compared with 344 pages for the RSS). To help decision makers digest these substantial reports, a summary paper was produced that outlined the process and key assessment messages for Ministers.

Case study 2 – East of England

As part of the review process for the Regional Economic Strategy (RES), the East of England Development Agency (EEDA) commissioned an independent 'Integrated Sustainability Appraisal' (ISA). In line with statutory requirements and best practice, the SA process for the RES incorporated several assessment procedures:

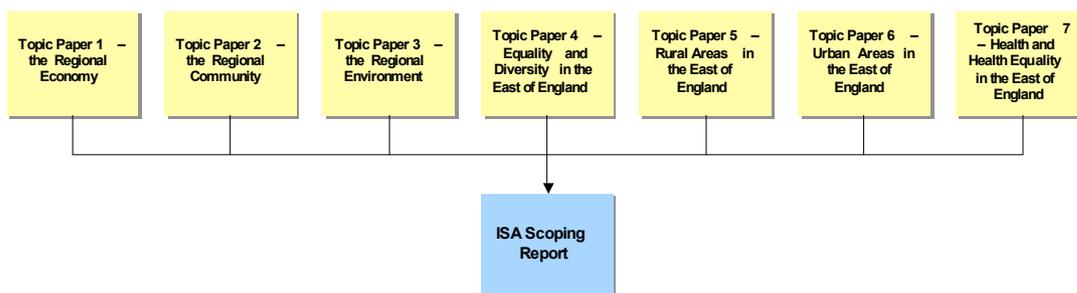
- SEA, including specific assessment of effects on health;
- Equality Impact Assessment;
- Rural Proofing; and
- Urban Proofing.

Rather than commissioning a series of separate assessments and having to take each one into account in turn (potentially confusing stakeholders with a multitude of different reports), this approach provided EEDA and its partners with one comprehensive report which looks at the impacts of the draft RES on all aspects of sustainability. This allowed the assembly of a wide-ranging evidence base, and for conclusions and recommendations to be based on a thorough understanding of the all the issues facing the region.

The approach adopted by EEDA centred on the SA operating as a catch-all for the other assessment strands. This is arguably more integrated than for the North West RSS, however a similar approach was adopted in that the SA process was used as the backbone for the other assessments, and deliverables and assessments were linked in with those for the SA. The actual structure also differed. The SA evidence base (Scoping Report) comprised a series of Topic Papers that covered not only the assessment but also SEA Directive (Annex 1 (f)) themes to ensure compliance (see Figure 2). These essentially formed chapters of the broader report with a main report bringing together the issues on all the topics. A Non Technical Summary (NTS) tied all the strands together in a summarised form.

This approach was subject to consultation with the statutory SEA consultees (the Environment Agency, Natural England and English Heritage) and other stakeholders. Feedback was broadly positive, however, there were concerns that through the integration process, emphasis on some assessment strands could be lost.

Figure 2 – Structure of East of England Regional Economic Strategy Sustainability Appraisal



Lessons learned

The approach of integration, from the fundamental inclusion of SEA into SA, to the integration of other assessments, provides a comprehensive source of information and a single reference point for policy makers. Additionally, the wide base of information provides a holistic picture with which informed decisions can be made taking into account all relevant considerations. Integrating assessments ensures that the messages are communicated at the right point (provided of course that the spine around which they operate is itself achieving this aim).

The data collection aspects of all the assessments is arguably the most important component, and having a common or shared approach to this stage can achieve savings in person time, reducing overlap and duplicate working and also allowing inputs from technical experts. The act of integration also provides room for exchange of ideas and capacity building amongst organisations.

The multitude of processes being undertaken does present some practical problems. There needs to be a significant amount of institutional knowledge on both sides to ensure that changes in the team(s), legislation or programme are adequately dealt with. Good project management support is needed to ensure delivery across all strands (arguably similar to EIA delivery). Document control becomes paramount at decision making points, particularly given that some assessments feed back into each other.

In addition, it takes time to synthesise the findings of multiple reports. The resources required to consider and document a wide range of issues, highlighting the tradeoffs and making recommendations, should not be underestimated. Due to the common purpose of the assessment (assessment of the plan) it is viewed that they can all be pulled together relatively easily, however this is overlooking the fact that other statutory assessments have very specific requirements (e.g. HRA) and that other assessments have skills that may need to be brought in, or use methodologies that are not necessarily compatible with SA/SEA in terms of process or outputs.

Finally, whilst an integrated approach may enable decisions to be made on the basis of a wide range of information, it is not necessarily at a level of detail, depth or understanding to have been adequately considered, often due to restrictions on resources or time.

Conclusions

The appraisal tools, whether statutory or non-statutory have been developed to ensure that all issues important for sustainable development are considered. SA offers a means of integrating all these tools into one assessment. In fact it could be argued that SA is integrated by default, and all other assessments should fall under this umbrella as they essentially cover discrete aspects of sustainability. SA has the advantage of offering a system of checks and balances that enables all relevant issues to be considered; however there is a danger that if the audit trail is not robust enough, some of the trade-offs may be lost in the process of integration.

The SA process can perhaps draw more from the EIA model of environmental assessment in approach to managing the process, in-depth analysis for certain issues of significance and in using a range of assessment tools to meet the differing demands of the respective assessments.

The potential benefits of integration are numerous: time and resource savings if teams undertaking the different forms and levels of assessment work together more closely; shared information and buy-in at senior management level; coordinated approach to stakeholder engagement and public participation; improved understanding of cumulative, indirect and long-term effects; and more informed decision-makers. A comprehensive evidence base and assessment process also has the potential to more effectively illustrate how options had been appraised and policies made.

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