

## IAIA Ireland-UK Branch response to the Planning White Paper for England:

### A call for IAIA Branch Member Involvement

*Email sent 22 May 2007, 15:56*

Dear IAIA Ireland-UK Branch members,

#### **The Department for Communities and Local Government (DCLG) launched the Planning White Paper for England 'Planning for a Sustainable Future'**

[www.communities.gov.uk/index.asp?id=1510503](http://www.communities.gov.uk/index.asp?id=1510503) yesterday, on 21 May 2007. The consultation is made up of a number of components and takes forward a number of suggestions from the Barker Review of Land Use Planning (2006). As such there are a number of areas and proposals, which as impact assessment professionals we should be interested in and respond to.

The IAIA Branch, together with the Institute of Environmental Management and Assessment (IEMA), produced a joint response to the Barker Review (see Branch webpage: [www.iaia.org/modx/index.php?id=354](http://www.iaia.org/modx/index.php?id=354)). We hope that a similar joint response will be produced in relation to the Planning White Paper.

The White Paper discusses, amongst other proposals:

1. The application of Sustainability Appraisal (**SA**) to new National Policy Statements, and also **Strategic Environmental Assessment (SEA)** in some cases, "*wherever appropriate*". However, should SEA be undertaken for all such statements, given their likely significant environmental implications?
2. That relevant current Government policy statements should become National Policy Statements when they meet new core requirements for content and consultation, which may require their modification. However, would this mean that the SA and possible SEA of such statements will only be retrospective?
3. That nationally significant infrastructure projects will be considered and determined by a new Infrastructure Planning Commission (IPC), whose role would include advising on the scope of **Environmental Impact Assessments (EIA)** where these are required. Such projects would be given a presumption in favour, and would be approved if consistent with appropriate National Policy Statements, as long as adverse local impacts do not outweigh (national) benefits. However, as the intention is to limit the consideration of local impacts to breaches of EU or UK law, could this severely limit the scoping of **EIAs** to only those impacts which are likely to infringe legal requirements, rather than others which may still be significant effects on the environment?

More generally, are there adequate safeguards proposed to ensure that the new system does not lead to infrastructure development which has long term negative environmental, social and economic consequences? Will the IPC be adequately staffed for its EIA role?

4. Sustainability Appraisal (SA) is described as time consuming and expensive. The requirement for undertaking SA for every Supplementary Planning Documents (SPD) should be removed, but that SPDs should still require SA if they have significant social, environmental or economic effects that were not covered in the appraisal of the parent Development Plan Document or where **SEA** is legally required. Is this continued linkage between **SEA** and SA appropriate or effective? Are there over-riding benefits in leaving the application of SA and SEA as it is?

5. That future guidance will make clear that where SA is undertaken, the appraisal of impacts on climate change will be a priority. Are there risks that other issues would become less important in SEA/SA as a result?

6. That the Government will examine the potential to raise the screening thresholds used in determining whether planning applications require **EIA**, to reduce the number of cases where a 'screening opinion' is needed. The White Paper states that this would not reduce the number of EIAs undertaken because the criteria for deciding if EIA is required are set out in the EIA Directive. However, does the requirement 'screen' projects, which then do not require EIA, pose an administrative burden on local authorities that needs to be removed, or are there over-riding risks that some smaller projects with significant environmental effects will soon be excluded from EIA?

7. The Government proposes to strengthen existing guidance in the revision of the **EIA** Circular due this summer, so that EIAs focus on the main significant effects without unnecessary elaboration. However, how can improved standards be achieved in practice? The formal scoping opinion process is not mandatory, but should it become so? Or is there more a need for a code of practice for practitioners, to improve the quality and usefulness of EIA work and the ES documentation.

8. That for retail development, the existing need and impact tests will be replaced with a new test which has a 'strong focus on a town centre first policy, and which promotes competition and improves consumer choice'.

9. That a new 'impact approach' is proposed for householder development, to reduce the need for minor planning applications, including for renewable microgeneration.

**The Branch organising committee strongly encourage IAIA members to get involved** in this consultation and help shape our consultation response. Please email [ie\\_uk@iaia.org](mailto:ie_uk@iaia.org) if you would like to join in - we will then get back to you. A draft of the Branch response will be circulated to members for comment when it is ready.

Consultation on this document formally closes on 17th August 2007.


(IAIA members who are also members of IEMA can also take part in the discussion forum on the Specialist Interest Group for Environmental Assessment, at [www.iema.net](http://www.iema.net) < username, password, < Specialist Interest Groups < Go to the EA SIG Forum.)

I look forward to hearing from you.

Best Regards,

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on behalf of the Ireland-UK Branch of IAIA

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