



giving  
nature  
a home

# Towards improving environmental assessment and enabling nature's recovery

November 2021





# Towards improving environmental assessment and enabling nature's recovery

November 2021

The Government has stated an intention to revise the system of environmental assessment across England to make it quicker and easier for developers to navigate whilst strengthening protections for nature. The RSPB believes that a strong system of environmental assessment should remain at the core of the planning system, supported by powers through the Habitats Regulations and reinforcing the mitigation hierarchy. Environmental assessment must not be required to trade-off ecological and biodiversity considerations with others.

Whilst the fundamentals of our environmental assessment system remain right and appropriate, the implementation of it is all too often flawed including by the preparation of unduly large, costly and unwieldy EIAs borne of a risk averse and 'blunderbuss' approach. In that respect there is scope for improvement. Here we set out our proposition for improving the efficiency and effectiveness of environmental assessment in England.

New housing development by Ray Kennedy (rspb-images.com)





# Summary of our proposals for SEA and EIA Reform

The RSPB proposes the establishment of a new digital mapping tool through which contemporary information is provided openly through a central data hub. This information would be derived in part from the content, priorities and evidence bases underpinning LNRs, as well as a range of other sources such as environment NGOs and local community groups, and made openly available and at fine scale.

The central data facility would be developed by a new Environmental Assessment Hub (or Environmental Observatory), and grounded upon Natural England's existing MAGIC system. Being finer scale, it would expand upon and add value to the Natural Capital and Ecosystems Services mapping work currently being undertaken by Defra.

Whilst this new tool is under development refinements should be made to the existing system of environmental assessment to bring them more effectively into a single framework, more proportionately and efficiently applied through mandatory scoping and a greater use of digitisation and standardised formats.

Our proposition for these refinements has five principal stages. We expand with further detail on each stage within the paper below.

## Stage 1: Evidence base

Considerable benefits and implementation efficiencies for users including the development sector would be achieved through enhanced nationally held data environmental, ecological and post-implementation intelligence being made available through a portal by a new Environmental Assessment Hub or '**Environmental Observatory**'. This would complement, and perhaps incorporate, the Natural Capital and Ecosystem Services mapping work that Defra is undertaking but would be fine scale enough for use also at a site-specific level.

Strategic level environmental assessment and local plan preparation should be supported by a more robust environmental assessment evidence base with clearer parameters set. In order to ensure greater strategic connectivity and alignment with policy priorities, the evidence base should continue to inform assessment both of local needs (biodiversity, climate, health and wellbeing); and national targets (e.g. the 25 Year Environment Plan, the Dasgupta Review, and the Environment Act species abundance target).

To ensure robustness, those preparing the evidence base should be required to consider and provide a summary of what each plan, report or target means for the specific plan or project that the evidence base is being prepared in connection with, and why any specific policy documents may have been discounted.

The transition towards this strengthened evidence base should be phased and take place through a clear and inclusive process of stakeholder engagement and consultation to support a gap analysis; identification of full data needs and standards; and consideration of the requirements and necessary arrangements for maintaining the database over time.



Turtle dove by serkanmutan (istockphoto.com)



Common pipistrelle bat by Laurie Campbell (rsfb-images.com)

### Stage 2: Strategic level environmental assessment

Strategic level environmental assessment as a vital process must remain alongside EIA as central to our system of environmental assessment, sitting within a single and integrated framework and informing good land-use planning decisions. Strategic level environmental assessment as an environmentally focused assessment at plan and programme level filters the need for EIA at a project level by steering development away from inappropriate locations and significantly reducing the extent to which EIA should be required.

Strategic level environmental assessment must therefore continue to inform the preparation of Local Plans and their site allocations, as well as any forthcoming requirements for wider zonal allocations, but in a more determinative way. Strategic level environmental assessment should clearly identify strategic options and any areas of land within Local Plans that are inappropriate for new development on environmental grounds. There should be a duty upon local plan-makers to incorporate the findings of strategic level environmental assessment, including areas of land covered by the plan that are not appropriate for development. This would provide greater clarity to investors from the outset and further reduce the need for EIA at project level.

The same strategic level environmental assessment would also support the preparation of the area's Local Nature Recovery Strategy (LNRS).

Strategic level environmental assessment for Local Plans should reinforce the mitigation hierarchy, including considering plan-level strategic mitigation (and compensation) requirements and arrangements, where appropriate enabling development to occur whilst mitigating consequential harm to vulnerable and protected habitats. Where such requirements are identified within the strategic level environmental assessment, there should be a duty upon local plan-makers to embed these within the plan, and secure them in relation to any development consents that may follow.

Strategic level environmental assessment should also apply to frameworks, strategies and programmes that provide strategic guidance and direction to broader investment decisions: for example the policy frameworks that give direction to investment decisions about highways infrastructure at sub-national and national levels; or larger-than-local Spatial Frameworks prepared to guide the preparation of local plans sitting under them.

The preparation of strategic level environmental assessments should be made more efficient through the greater use of digital technology and the introduction of standardised template structures for the layout of Environmental Reports.



## Stage 3: EIA

Whilst the vast bulk of development applications do not, and should not, need to be subject to EIA, a fraction (currently around 0.1%) comprising of those with the potential to cause the most damage to nature and the environment will need to continue to be.



Whilst the name and mechanism might change, we use EIA as a shorthand for site-specific impact ecological assessment. EIA with detailed on-site survey should continue to be applied at the project level where development proposals have the potential for environmental harm, particularly where they are contrary to the development plan and the SEA underpinning it. Clear gateway thresholds should continue to govern the scale and nature of development proposals that would require EIA, and the Precautionary Principle should be required in policy and guidance to apply regarding the appropriateness of undertaking it. In the light of the biodiversity crisis, greater emphasis within the EIA process should be placed upon considering habitat connectivity.

EIA should be made more effective and efficient by being targeted and implemented in a more proportionate way. This would be achieved by the introduction of **mandatory scoping**, the greater use of digital technology and the introduction of standardised template structures for Environmental Statements.

EIA should be more outcome focused, having a greater bearing on decision-making in relation to development applications.

## Stage 4: Mitigation/compensation

Where EIA concludes that harm may occur from development but that it can be satisfactorily mitigated, then mitigation must be secured through planning conditions or a legal obligation.

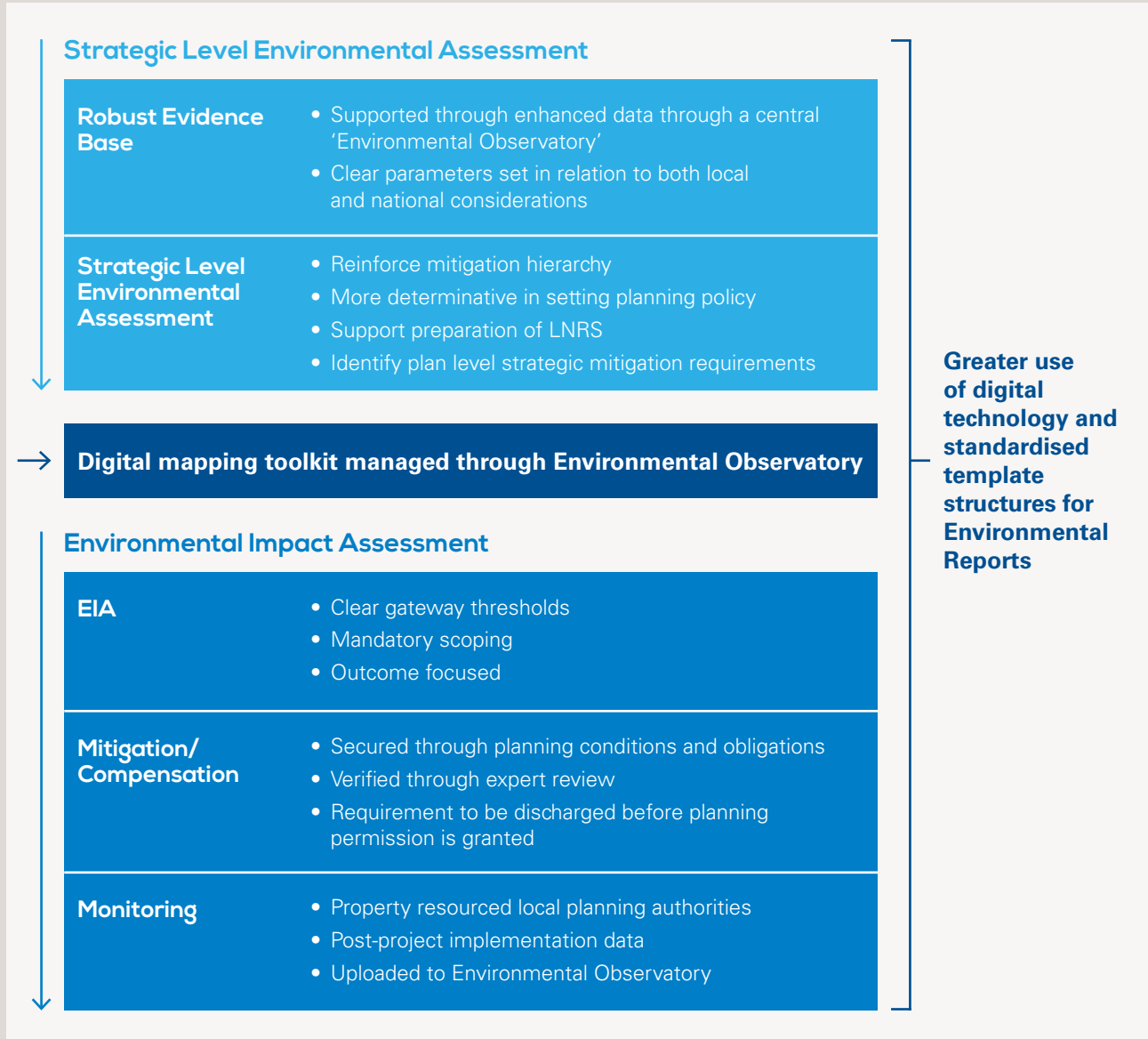
The EIA must present clear recommendations on how the proposal should avoid, mitigate, or as a last resort compensate for environmental harm. These recommendations should be verified by the decision-maker after expert review and must be incorporated within the permission either through the design of the proposal, through planning conditions or a legal obligation, or some combination thereof. Only when this is achieved can the EIA recommendations be considered 'discharged' and permission granted.

## Stage 5: Monitoring

To be undertaken by properly resourced local planning authorities with data, including in relation to post-project implementation, uploaded to the Environmental Observatory to assist and support future assessments.



# Environmental Assessment in a single and reformed framework



# Our principles

The RSPB considers that 12 principles should underpin any good environmental assessment system, and our proposition reflects them.

1. **Environmental assessment should apply to all levels of decision-making, from policy and programme to plan and project. That's not to say that one size fits all, so...**
2. **... it should apply to all types and sizes of projects and plans which have the potential to affect the environment, but be proportionate to their scale and complexity or their impacts on it**
3. **It should consider biodiversity in all its forms, including sites and species, designated or undesignated**
4. **It must be done in a timely way, so that the results can inform the eventual shape of the plan or project**
5. **There must be public participation, which is both timely and inclusive of civil society, whether community groups or other stakeholders**
6. **Alternative options should be considered, particularly alternatives that are less damaging to the environment, and the reasons for rejecting any options should be made public**
7. **Cumulative impacts must be considered**
8. **It should be based on up-to-date and scientifically robust evidence, including evidence on the value of the natural environment**
9. **Both the assessment, and its review by decision-making bodies, must be informed by expert advice**
10. **It must have genuine influence over the decision, especially where there are significant environmental effects**
11. **Implementation must be monitored to enable the mitigation of any unforeseen impacts and to provide learning for future plans and projects**
12. **The environmental protection provided must be at least equivalent to the protection formerly given by relevant European Directives.**



## Our proposition in more detail

The RSPB proposes that environmental assessment should progressively shift to a more interactive, map-based system with a greater use of ecological data supported by community and stakeholder participation. Through drawing upon international best practice, particularly from South Africa, there is scope to develop approaches that would be quicker and easier for developers to navigate, whilst simultaneously building upon one of the Government's recent policy introductions (Local Nature Recovery Strategies), and not just ensuring strong protections for nature but also actively contributing towards its recovery.

The Government has introduced Local Nature Recovery Strategies (LNRS). The principle of these is warmly welcomed, however their potential is at strong risk of being hampered through strategic disconnect. In particular, if the planning system is to support nature's recovery in the face of the nature and climate emergency then LNRS and environmental assessment processes must speak to each other. For example, considered in isolation a single agricultural field may be assessed of relatively low biodiversity value and therefore be appropriate for development. However, seen within a broader context, that very same field could sit within a location or corridor making it and its surrounding hedges a vital stepping-stone connecting other priority habitats and sites of nature conservation value – meeting the essential pre-requisites for nature's recovery of 'more, bigger, better and joined-up' habitats identified by Sir John Lawton in his report 'Making Space for Nature'<sup>1</sup>. LNRSs also contain significant amounts of up-to-date and locally specific data and intelligence which it would be helpful to make easily and readily accessible to all.

A system should be established through which contemporary information is provided in a digital mapped format through a central data hub. This information would be derived in part from the content, priorities and evidence bases underpinning LNRSs, as well as a range of other sources such as environment NGOs and local community groups, and made openly available and at fine scale. The central data facility would be developed from the Environmental Assessment Hub or 'Environmental Observatory' that we are also proposing within this paper, and grounded upon Natural England's existing MAGIC system. Being finer scale, it would expand upon and add value to the Natural Capital and Ecosystems Services mapping work that Defra is currently undertaking.

The value of this approach would be that, with appropriate data protection, filters and access rights in place, developers or any other stakeholder with interest in a particular parcel of land could quickly and easily focus in on it using the map, which in turn would describe the nature and character of the site, any nature conservation or other designations applying to it, and known species or factors of ecological interest. This in turn could help to inform the nature of any ecological surveys likely to be needed; whether any specialist ecological assessment is likely to be necessary; and whether any required surveys would have specific timing requirements. All of this information, readily available at the very start of the development process, would be invaluable to investors and developers.

1 'Making space for nature': a review of England's wildlife sites published today – GOV.UK ([www.gov.uk](http://www.gov.uk))





Common nightingale by Oliver Smart (rspsb-images.com)

Likewise, it would also help LPAs and other bodies to ensure that development was steered away from sites in the interests of furthering nature's recovery. With assets of ecological value identified and mapped upfront, it would also act to deter the clearing of land prior to the making of applications for planning consent in the hope of making that consent easier to secure and Biodiversity Net Gain requirements easier to meet. There would be an evidence base upon which any necessary steps or decisions could be made in the light of the known damage having been deliberately inflicted.

In turn, parcels of land of limited ecological value could be readily identified, giving a steer to investors, developers and plan-makers as to where development might be more appropriate and acceptable at least in ecological terms.

There is a win-win under such a scenario. Developers and investors acting responsibly would have the benefit of a tool to assist and support investment decisions and navigation of the development process; whilst simultaneously the actions of irresponsible developers would be exposed enabling appropriate policy responses, including in relation to delivery of Biodiversity Net Gain requirements, to be taken.

Such a tool would be world-class, and a vital information source for strategic and site-based assessments rather than a replacement of them. It would be a significant step forward in showing our ability to plan for, and deliver, truly sustainable development whilst tackling the biodiversity crisis.

However, it would take time to develop and in the meantime there are number of refinements to the system of environmental regulations – currently encompassing Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) – that are needed now to tackle the issues that frequently lead to poor implementation. They are also needed for the Government to be able to achieve its stated objectives for reform. Strategic level environmental assessment and EIA including with detailed on-site survey must operate within a single framework, ensuring a more proportionate, targeted and outcome focused approach to EIA, and remaining fit for purpose whether or not there is a move to a zonal and data driven planning system.

Refinements should be made in relation to five key stages of the environmental assessment process and in order to bring them into a single framework:

### Stage 1: Evidence base

It is essential that the implementation of environmental assessment is driven by clear practice guidance and robust data. We propose a national Environmental Assessment Hub or 'Environmental Observatory'. This will provide guidance – and crucially – robust environmental data sets which together will drive excellence in practice. It would be part funded through developer contributions but will smooth the process for developers and LPAs, reducing timescales and ultimately reducing overall costs.

The Observatory would provide guidance as to best practice, and act as a repository for data provided by public agencies, NGOs and the development sector about the nature of real-world environmental impacts on specific types of development which in turn could assist in making the EIA mandatory scoping process (Stage 3) quicker and more efficient by providing a non-exhaustive starting point as to the likely nature of impacts needing to be taken into account. This real-world data must include post-project implementation information through a requirement upon developers to supply it for an appropriate and pre-determined period of time and to a given standard.

The Government's introduction of Local Nature Recovery Strategies provides an ideal vehicle to locally collect environmental and ecological data, as well as priorities for driving nature's recovery, and these should feed into the Observatory helping to strengthen its level of granularity and connecting LNRS to both Local Plan policy preparation and the development consenting process.

The Environmental Observatory should draw upon and contain high quality and up-to-date environmental and ecological data, at a level of granularity commensurate with supporting the preparation of a strategic level environmental assessment at local authority level. This will require an uplift in the quality, breadth and granularity of such data held by central government.

The local plan strategic level environmental assessment evidence base itself should continue to contain both an assessment of local needs and issues (housing and employment needs, nature and biodiversity, climate, health and wellbeing etc.); but should also be required to assess against national needs and targets with these clearly prescribed as a minimum (including for example the 25 Year Environment Plan, Dasgupta Review, and the Environment Act species abundance target).

In order to be more robust, those preparing the evidence base should be required to consider and provide a summary of what each plan, report or target means for the specific plan or project that the evidence base is being prepared in connection with, and why any specific policy documents may have been discounted.

The evidence base should be transparent and open to public scrutiny. The transition towards this strengthened evidence base should be phased and take place through a clear and inclusive process of stakeholder engagement and consultation to support a gap analysis; identification of full data needs and standards; and consideration of the requirements and necessary arrangements for maintaining the data base over time.





## Stage 2: Strategic level environmental assessment

Strategic level environmental assessment must remain alongside EIA as central to our system of environmental assessment, sitting within a single and integrating framework and informing good land-use planning decisions. Strategic level environmental assessment as an environmentally focused assessment at plan and programme level filters the need for EIA at a project level by steering development away from inappropriate locations and significantly reducing the extent to which EIA should be required.

Strategic level environmental assessment should remain an integral component of local plans, and should also apply to frameworks, strategies and policies that provide strategic guidance and direction to broader investment decisions: for example the policy frameworks that give direction to investment decisions about highways infrastructure at sub-national and national levels; or larger-than-local Spatial Frameworks prepared to guide the preparation of local plans sitting under them.

Strategic level environmental assessment should support the mitigation hierarchy and inform and drive the site allocation and the future designation of any wider zones within the Local Plan. This should strategically steer new development away from the most environmentally sensitive locations in the first place, reducing the need for EIA thereafter.

In order to be more outcomes focused, strategic level environmental assessment should be given greater weight in the plan-making process by being more determinative. Alternative strategic options should be considered, particularly alternatives that are less damaging to the environment, and the reasons for rejecting any options should be made public as part of the local plan consultation process. Indeed, the local plan process should allow for full openness and public scrutiny, including of the strategic level environmental assessment and subsequent site and zonal allocations and related policies.

Where the strategic environmental assessment process identifies any areas of land within Local Plans that are inappropriate for new development on environmental grounds there should be a duty upon local plan-makers to designate those as such clearly within the plan. This would provide greater clarity to investors from the outset and further reduce the need for EIA at project level.

There should be a formal requirement that strategic environmental assessment be undertaken by suitably professionally qualified expert practitioners.

The new national Environmental Observatory we propose could also offer a 'Strategic Advice Service' to LPAs, providing advice and guidance in the preparation of strategic level environmental assessment, and being commissioned to prepare strategic level environmental assessments or elements for them where they lack in-house capacity and expertise and it may be more a more efficient and expeditious route forward for them. It could also act as a quality control by reviewing completed strategic level environmental assessments and potentially EIAs too.

Yellowhammer pair by Ernie Janes (rsfb-images.com)



## Casestudy: Lodge Hill, Medway, Kent

Lodge Hill, on the Hoo Peninsula in Medway, Kent, is the most important site in the country for nightingales, and yet found itself subject to a proposal for a 5,000 home development.

The site was a large area of Ministry of Defence (MoD) land, used between 1875–1961 as an ‘ordnance depot’, storing explosives in bunkers. Subsequent to that, it was a British army training ground. This all meant that it was out of the public eye behind its heavily guarded fences for over a century.

Between 2007 and 2010 the MoD produced a Planning Statement setting out a possible Masterplan for the site’s re-development, leading to surveys being undertaken by the developers to establish what wildlife and other potentially important features might be on the site.

In 2011 the British Trust for Ornithology’s (BTO) national nightingale survey revealed that Lodge Hill supported 85 singing males, of a species in steep decline in Britain, making it the most important site in the country for it. In 2013 this discovery led to Natural England notifying it as a Site of Special Scientific Interest (SSSI) as an extension to the neighbouring Chattenden Woods SSSI.

However, the local planning authority, Medway Council, persisted with a desire to see Lodge Hill developed for new housing by proposing to allocate it for development in its draft Local Plan. Following consideration by the Planning Inspectorate, who found the proposal in conflict with national planning policy as set out within National Planning Policy Framework (NPPF), it was subsequently withdrawn.

Despite this, in 2014 a revised Outline Planning Application for 5,000 houses was submitted on behalf of the MoD, with this subsequently being approved by Medway Council’s Planning Committee. As a result, and given the proposal’s conflict with the NPPF, the RSPB together with other conservation organisations and more than 12,400 concerned members of the public wrote to the Secretary of State, asking for the decision to be ‘called in’ to be decided by Government.

The application was duly ‘called-in’ in 2015 requiring the developers to undertake further surveys in advance of a Public Inquiry in March 2018. In the interim Medway Council included Lodge Hill in every one of its development options in its draft Local Plan. Over 12,000 people wrote to the Council to ask that Lodge Hill be withdrawn from the Local Plan.

On 5 September, it was announced that the original planning application for 5,000 houses had been withdrawn, and hence the 2018 Public Inquiry would not take place. The site has now been transferred to Homes England which, whilst pledging to protect the SSSI could yet bring forward new residential development in close proximity to it.

This case highlights two important elements of our proposition for the reform of environmental assessment. Firstly, the importance of detailed on-site ecological assessment as the importance of the Lodge Hill site for breeding nightingale would not have been recognised without it and critical habitat for the species would have been lost further exacerbating its decline. Secondly, once protected as a SSSI the site should have been screened out as being appropriate for development by the strategic level environmental assessment informing the preparation of the Local Plan. This would have provided certainty for developers and investors; and through the site not being proposed as a Local Plan allocation would have saved the costs and community opposition arising from the granting of the resulting planning application and subsequently triggered (but later abortive) Public Inquiry.



Nightingale by David Tipling (rspb-images.com)

“Lodge Hill, Kent, is the most important site in the country for nightingales, and yet found itself subject to a proposal for a 5,000 home development.”



## Stage 3: EIA

Whilst the vast bulk of development applications do not, and should not, need to be subject to EIA, a fraction comprising of those with the potential to cause the most damage to nature and the environment will need to continue to be. That fraction is currently around 0.1%<sup>2</sup> of all applications but could potentially be further reduced through implementation of the more determinative approach to strategic level environmental assessment as Stage 2 of this integrated approach set out above.

EIA including detailed on-site survey should continue to be applied at the project level where development proposals have the potential for environmental harm, particularly where they are contrary to the development plan and the SEA underpinning it. Clear gateway thresholds should continue to govern the scale and nature of development proposals that would require EIA, and the Precautionary Principle should be required in policy and guidance to apply regarding the appropriateness of undertaking it. In the light of the biodiversity crisis, greater emphasis within the EIA process should be placed upon considering habitat connectivity.

EIA should be undertaken more proportionately and be outcome focused. This can be achieved in large part through the introduction of a requirement for **mandatory scoping**. As the first stage of EIA, mandatory scoping is one of the main ways in which current problems of poor implementation can be rectified. It would identify the issues and relevant level of detail that the EIA should focus on, ruling out issues that do not require assessment and that would otherwise lead to unwieldy, expensive and slow to prepare reports. Mandatory scoping would enable the early engagement of stakeholders and the public, and could potentially include the drawing-up of Statements of Common Ground between all interested parties. This could ensure a far more targeted, proportionate, clear and expeditious approach to EIA. It should also act against the preparation of unduly long and wide-ranging 'blunderbuss' assessments borne out of a risk aversion culture.

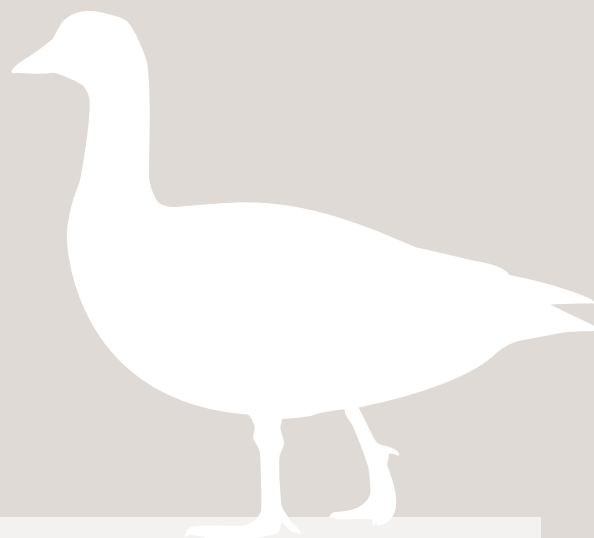
The Environmental Observatory that we propose could hold a register of the likely impacts upon the environment from key development types based on the conclusions of previous EIAs which could inform and speed-up the process of mandatory scoping. This could provide a rapid way for developers to start to determine the type of impacts that may need to be considered. However it cannot ever be exhaustive and therefore policy and guidance should make clear that a precautionary approach should be taken at all times including where conclusions as to the nature or severity of impacts is disputed, and that the register is to be interpreted as guidance as to what the initial scope might be and not prescription.

The implementation of EIA should also be made quicker and more effective by harnessing the greater use of digital technology and the introduction of standardised template structures for the laying out of Environmental Statements.

There should be a formal requirement that EIA be undertaken by professionally qualified expert practitioners. The Environmental Observatory would provide advice if needed as to what constitutes a relevant and acceptable level of specialist professional qualification.

The conclusions of EIA should be more outcome focused having a greater bearing upon decision-making. See stage 4 below.

“Tipner West... home to significant numbers of dark-bellied brent geese, dunlin, black-tailed godwits and many other wintering waders. It delivers ecosystem services...”



### Casestudy: Tipner West, Portsmouth

Tipner West, a wild corner of Portsmouth Harbour, is designated as a Special Protection Area (SPA), and is a RAMSAR site. It is home to significant numbers of dark-bellied brent geese, dunlin, black-tailed godwits and many other wintering waders. It delivers ecosystem services from carbon capture to water filtration, and it helps protect Portsmouth itself from coastal erosion.

However, this did not prevent Portsmouth City Council from proposing the site within its draft Local Plan for 4,000 new houses and employment development. This development would have destroyed this important area, and as well as over 30ha of the SPA itself, 27ha would be reclaimed habitat from the harbour.

Opposition to the proposals has been fierce and widespread, including coming from the RSPB, the Wildlife Trusts, local communities and some Elected Members of the City Council. Some £18m of public money was spent in developing the project and seeking to attract investors, before a decision in the face of major public and stakeholder opposition resulted in the City Council pausing work and re-thinking its options.

Under the proposals that we set out within this report the Tipner West site would have been subject to a strategic level environmental assessment at the point of inception, and with a duty upon local plan-makers in place to incorporate the findings of that assessment, including areas of land covered by the plan that are not appropriate for development such as Tipner West, within the Local Plan. That would have reinforced the mitigation hierarchy; protected a vitally important site for nature; provided greater clarity and certainly to investors and promoters from the outset; and saved the abortive spend of £18 million of public funds.



Black-tailed godwit by Richard Bedford (rspb-images.com)

“... However, this did not prevent Portsmouth City Council from proposing the site within its draft Local Plan for 4,000 new houses and employment development.”





Stone curlew by Mike Lane (rspp-images.com)

## Stage 4: Mitigation and compensation

The EIA must present clear recommendations on how the proposal should avoid, mitigate, or as a last resort compensate for environmental harm. These recommendations should be verified by the decision-maker after expert review and must be incorporated within the permission either through the design of the proposal, through planning conditions or a legal obligation, or some combination thereof. Only when this is achieved can the EIA recommendations be considered 'discharged' and permission granted.

## Stage 5: Monitoring

The undertaking of EIA should not be, but all too often is, seen as the end of the environmental assessment process. A robust monitoring regime should underpin the effective and efficient implementation of environmental assessment to ensure that it achieves the right outcomes, as well as to inform best practice in the future and make it more expeditious. This will require well-resourced Local Planning Authorities. Data about the environmental impact of different types of development should be captured and uploaded to the Environmental Observatory to inform future mandatory scoping work.

Similarly, there should be a stronger requirement for collecting post-project implementation data to inform the likely nature of effective mitigation and (strategic) compensation arrangements for given types of impact. This would require investment in the setting of data standards; ensuring that they are adhered to; and that the data is fit for purpose and can be readily uploaded to the Observatory. However the costs associated with establishing the Observatory would represent an investment with downstream cost savings for developers arising through greater speed and efficiency for them in the process of undertaking future EIAs, as well as better outcomes for nature.



# The resource requirements of this approach

Implementation of these reforms in full would require:

- Investment in the establishment and maintenance of a new national Environmental Observatory, partly funded by developers and through commissioned services (e.g. Strategic Advice Service) in order to ensure appropriate data standards and adherence.
- Up-front investment in better digital data sharing platforms but with downstream cost savings arising for all sectors through more the more efficient undertaking and presentation of EIAs.
- Better resourced Local Planning Authorities as already proposed through the Government's proposed Resources and Skills Strategy.
- Greater investment (by developers) in monitoring and post project implementation data.

# The benefits of this approach

Implementing these reforms would deliver a range of benefits:

- A stronger and more coherent alignment of strategic level environmental assessment and EIA within a single framework.
- A stronger strategic alignment of strategic level environmental assessment with local and national policy objectives.
- Alignment with any move within the land-use planning system to adopt zonal designations at a scale larger than site allocations.
- A clear policy framework setting out where development should and should not take place. This should reduce the need for EIAs.
- More proportionate, targeted and outcome focused EIAs which are quicker and cheaper to prepare; more efficient for LPAs and other stakeholders to navigate; and more effective in their targeting of key impacts.
- Better quality information and support, and more readily accessible, to all interests at every stage of the process.
- More effective mitigation and compensatory arrangements as a last resort based on better intelligence as to the efficacy of previous solutions.

**... an environmental assessment system that is easier and quicker for developers to navigate and provides stronger protections for nature.**



