



Integrated Impact Assessment (IIA) to the London's Sub- Regional Development Frameworks

Final Report

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This report presents the results of a project implemented by Environmental Resources Management (ERM) on behalf of the Greater London Authority (GLA) and the London Health Commission (LHC) to carry out a research project involving the pilot application of Integrated Impact Assessment (IIA) to London's Sub-regional Development Frameworks (SRDFs).

The project ran from September 2004 to November 2005 and involved a range of London stakeholders both in the design of the detailed IIA methodology and in commenting on its application to the SRDFs.

1.1 BACKGROUND TO THE PROJECT

The GLA and the London Regional Public Health Group commissioned the development of an Integrated Impact Assessment (IIA) model to support the development of the SRDFs. This project included a review of existing impact assessment approaches and a number of workshops to obtain inputs to the development of the model.

The model took account of the GLA's cross-cutting responsibilities, the need for compliance with the SEA Directive and the requirements of Sustainability Appraisal and the need to integrate the London Sustainable Development Commission's Framework for Sustainable Development into the assessment model.

The key elements of the model that was developed are as follows:

- Development of appraisal objectives (and framework)
- Collection of policy context and baseline information
- Development of the scope of the assessment and consultation on the scope of assessment
- Appraisal and comparison of options
- Development of recommendations including a process for the ongoing monitoring of predicted impacts.

More information on the initial part of the project is available from the LHC and GLA.

It was this model that formed the basis of the research project which is the focus of this report. The second part of the development and piloting of the IIA model focused on the following activities:

- Development of an approach to the practical application of the IIA model to the SRDFs

- Collation and review of the existing evidence base to build on the work of the LHC, GLA and LSDC and highlight where evidence was weak or lacking (both as a whole for all of the SRDFs and also at the level of individual SRDFs)
- Five appraisal workshops with stakeholders from each of the sub-regions
- Report on the outcome of the project

1.2 *AIMS AND OBJECTIVES OF THE PROJECT*

Whilst the broad aims and objectives of the research project remained as set out above there were some additional activities that were agreed with the Steering Group at the start of the project.

These included a review of the work done during the initial part of the project to assure compliance with government guidance on SA/SEA, a review and revision of the appraisal framework and a more in depth focus on the integration of health issues into the methodology.

It was felt to be important that the IIA methodology should be sufficiently robust to meet and indeed exceed the requirements of the SEA Directive.

1.3 *STRUCTURE OF THIS REPORT*

The remainder of this report is structured as follows:

- The IIA Methodology and Process;
- Results of the project; and
- Recommendations for the future use of the IIA methodology.

The report also contains a number of annexes these contain the following information;

- The Appraisal Framework;
- The IIA reports;
- Notes of stakeholder meetings;
- Information on baseline data; and
- Examples of maps produced for the IIA project.

This document contains a number of acronyms, these are as follows:

DEFRA	Department for Environment Food and Rural Affairs
EIA	Environmental Impact Assessment
EQIA	Equalities Impact Assessment
GLA	Greater London Authority
HIA	Health Impact Assessment

IIA	Integrated Impact Assessment
LHC	London Health Commission
ODPM	Office of the Deputy Prime Minister
PCT	Primary Care Trust
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SRDF	Sub Regional Development Frameworks

2.1*INTRODUCTION*

This section of the report discusses the IIA, Methodology and Process.

The pilot application project did not substantially alter the basic components of the IIA model developed in the first phase nor did it change the sequence of steps in the IIA process, however it did test out how the IIA methodology could be implemented in practise, building not only on the earlier work of this project but also building on emerging best practice in SA/SEA in terms of the application of ODPM's guidance on SA/SEA. It also substantially revised the appraisal framework that drives the outcomes of the assessment.

2.2*THE IIA METHODOLOGY*

As indicated above, the research project applied the IIA methodology without major modifications to the key stages and process steps. The original research developed an approach that is essentially that of SA/SEA, as set out in European Commission and UK Government legislation and guidance.

In terms of the application of the IIA methodology to the SRDFs the following comments on the key stages in the IIA methodology should be noted.

Overall the IIA methodology combines SA and SEA along with aspects of HIA. It does not address equalities impacts or integrate elements of EQIA methodology. It should be noted, however, that the IIA methodology could incorporate the requirements of EQIA extremely easily. Indeed, this would be an extremely useful additional development to the IIA Model.

IIA is amenable, via its appraisal framework and the baseline and policy context aspects of scoping, to building in considerations/'proofing' relating to rural issues, age proofing, climate change, future proofing and equalities. The IIA methodology as applied to the SRDFs has been reviewed and amended (basically in terms of the Appraisal Framework) to reflect these issues.

The key components of the IIA methodology are summarised in Boxes 2.1 and 2.2 below.

Box 2.1 *The IIA Project Process*

-
- Initial review of IIA Methodology
 - Development of Appraisal Framework
 - Engagement with Stakeholders on the Appraisal Framework and baseline data (via a workshop)
 - Initial assessment of draft SRDFs and feedback to GLA planners
 - Detailed assessment of SRDFs
 - Workshop with GLA planners, LHC and stakeholders on assessment findings
-

Box 2.2 *The IIA Methodology*

-
- Builds on current requirement for Sustainability Appraisal, SEA, HIA and other assessment techniques
 - Is designed to be compliant with SA/SEA requirements as set out in UK regulations and ODPM guidance
 - Integrates health and other issues such as rural future, climate change and age - proofing
 - Uses a consistent basis for its appraisal framework based on the work of the LSDC
-

In applying the IIA methodology to the SRDF's every attempt was made to apply as much of the methodology as time constraints and the nature of the SRDF's allowed. It was never the intention of the project to carry out a full SA/SEA type assessment of the SRDFs or to meet the consultation requirements that are a key feature of SA/SEA.

The assessment element of the IIA is reliant on the availability of baseline data on each of the SD objectives, preferably including both historic and predicted trend data and the evidence used to formulate the policies and actions within the SRDFs.

In common with the majority of SA/SEAs the assessment of the SRDFs was presented in the form of a brief textual summary highlighting the key findings of the assessment and a set of matrices presenting the SD objectives, the detailed appraisal questions, a 'score' and a commentary on the score. (see Annex B of this report)

The scoring system uses symbols as follows:

- ✓✓ = Clear, strong positive impacts
- ✓ = Overall influence likely to be positive

- ? = Overall impact/influence unclear
- × = Overall impact/influence likely to be negative
- ×× = Clear, strong negative impacts
- 0 = Neutral

As indicated above each of these scores is based on an analysis of the likely effects of the plan or policy on the baseline condition/position. Given the nature of the SRDFs it was also important to identify whether the plans recognised their impact on individual SD issues or not ie. Were the potential effects of the plan recognised and were actions proposed to reduce impacts and/or capture benefits.

In practice, individual scores were developed in accordance with the following rationale:

- ✓✓ = recognition of an SD issue within the SRDF with an evidence base and actions which are likely to lead to a positive impact on the existing baseline e.g. actions to improve recycling rates and encourage community involvement in waste management or actions to improve levels of access to greenspace in the sub-region.
- ✓ = recognition of an SD issue within the SRDF including identification of the current status of the issue within the sub-region e.g. IMD data on deprivation within the area and an overall set of actions that are likely to lead to improvements in levels of deprivation but which may (or may not) directly target deprivation i.e. a less direct link to the SD issue than would be the case for a ✓✓ score.
- ? = a clear SD issue for the sub-region with some recognition in the SRDF but no clear actions or policies to address baseline strengths or weaknesses. Likely to need further clarifications. Due to the lack of an explicit monitoring framework and implementation plan for the SRDFs many scores were of this type.
- × = no recognition of the SD issue within the SRDF and/or actions that could contribute to a negative impact on the existing baseline.
- ×× = actions that could lead to direct negative impacts on the baseline e.g. a predicted increase in waste arisings with no supporting actions to reduce or recycle waste or improve waste management infrastructure.
- 0 = an SD objective that does not appear to relate to the SRDF. This is unlikely because of the relevance of the SD objectives to the majority of spatial plans and sectoral strategies.

In addition, because of the lack of clarity in many cases over the relationship between the SRDFs and particular SD objectives and the detailed appraisal questions 'hybrid' scores were often used. These scores are shown as ✓/? or ✘/? and indicate that there is a lack of clarity but from our reading of the SRDF there is likely to be some scope for either positive or negative impacts. Such scores are clearly discussion points where the assessment team and the strategy or plan team need to discuss how the 'score' can be resolved. These are also possible areas of opportunity in terms of SD outcomes. A more formal assessment process would need to ensure that there were detailed discussions on these areas so that opportunities for SD benefits can be maximised.

2.3 *THE PROCESS*

Given that SA/SEA was not a formal requirement for the SRDFs it was not feasible to pilot the full IIA process model developed during the initial phase of this project. The process did actively involve stakeholders in the review of the proposed project, the development of the Appraisal Framework and the evaluation of the results of the pilot application of IIA to the SRDFs.

The key elements of the IIA methodology are essentially those foreseen for SA/SEA processes within the ODPM guidance. In practice, in the pilot IIA project much of the process was more 'engaged' than is required or likely to be achieved in full SA/SEA processes where stakeholder engagement often tends to be more formal.

Key process stages are presented in Box 2.3 below. From experience gained during the pilot application of the IIA model we do not feel that the process requires significant modification although it will be important to maintain the level of formal and informal stakeholder engagement that has been one of the key elements of the pilot project. This is often not a strong feature of SA/SEA processes where engagement can be both more formal and more formulaic.

Box 2.3 Key Stages of the IIA Process

-
- Identify the policy context and baseline
 - Identify appraisal objectives
 - Produce analysis of relevant policies and programmes and baseline conditions (Scoping Report)
 - Draft Environmental Report (SEA requirement and IIA Report)
 - Review of final option(s)
 - Finalise report/monitoring framework
-

Each of the key stages in the IIA process is described in more detail below.

- *Identifying the Policy Context and Baseline*

In the pilot project the emphasis was on the collection and assessment of baseline data to support the assessment rather than on the policy context and the review of relevant policies and programmes that is a requirement of SEA.

If the IIA methodology was to be implemented formally to carry out an assessment designed to meet ODPM's requirements then part of the Scoping Phase (as required by SEA) would need to include a formal review of the relevant international, national and regional policy context.

Details of the baseline data available and relevant to an IIA for London at regional and sub-regional level are provided in a separate annexe to this report.

The key issues raised by this project with respect to this step in the IIA process are as follows:

- Baseline data for London as a whole are generally good and the evidence base for the London Plan and the SRDFs is rich in terms of specifically commissioned research on issues such as housing, transport, land availability, etc.
- Baseline data relevant to health issues is available as is IMD data and this allows for the straightforward integration of these issues into the baseline.
- Baseline data at sub-regional level are more patchy. This is for a number of reasons, the most obvious one being the boundaries of the sub-regions that are not, generally speaking, recognised data collection units. The aggregation of local data into sub-regional data is in theory a possible way of addressing this lack of specific sub-regional data but this was not pursued by the pilot project.
- Little use was made of qualitative data in the IIA project. This was not because it was considered to be in any way inferior to more quantitative or 'recognised' datasets but simply because of a lack of time to explore if such data sets, especially attitudinal surveys, etc, existed which could help to broaden the evidence base. At a time when Defra and others are analysing the need for more opinion-based inputs to policy formulation it would be useful for the GLA/LHC to consider how they should use available qualitative data to enrich the baseline especially since the qualitative inputs to assessments via consultation processes often capture a very limited number of perspectives on both planning and sustainable development issues.
- Formal SEA would require more specific involvement, in particular of the Statutory Consultees, in the development of the baseline and the review of policies and programmes. In the case of this project the involvement of the Statutory Consultees was limited to a workshop

focusing on baseline information and the analysis of key themes and questions to be included in the Appraisal Framework.

- *Identification of Appraisal Objectives*

The initial phase of the IIA project had already done some work on this aspect of the methodology but it was felt necessary to review this work and to modify it to make it more balanced in terms of sustainable development, to integrate health more effectively and to make the detailed appraisal questions more 'spatial'.

The consultants used the same basic building blocks to develop the appraisal objectives and the appraisal framework, ie, the London Sustainable Development Framework and the subsequent development of Sustainable Development principles and objectives carried out by the London Sustainable Development Commission and others.

The draft appraisal objectives and framework were presented at a workshop with stakeholders. They generated considerable discussion on two counts. Firstly, stakeholders who had been involved in the initial phase of the project wanted to understand why changes to the appraisal framework developed at that stage were necessary. Secondly, stakeholders were keen to make inputs to the detailed appraisal questions. The workshop was extremely useful and also generated useful subsequent feedback including suggestions on 'proofing' tools.

It was not difficult to establish relevant appraisal principles and objectives – these are well established in the case of London. This is likely to remain the case for the foreseeable future.

The IIA pilot project has not raised any major issues on this stage of the methodology. However, it is important to take into account two issues which are of relevance to the future application of IIA namely:

- The need to make sure that appraisal questions are relevant to the plan or strategy being assessed; and
- The London Sustainable Development Framework needs to be reviewed in the light of the 2005 UK Sustainable Development Strategy and this may lead to the amendment of Sustainable Development objectives and principles to be used in future assessments.

- *Analysis of Policies and Programmes and Baseline Conditions (Scoping Report)*

In the context of a formal SEA it would be necessary for the IIA to produce a Scoping Report setting out the aims and objectives and intended scope of the assessment, the sustainable development objectives

and principles to be used as the basis of the assessment and the draft baseline report and the draft review of relevant policies and programmes.

This report is then formally submitted to the Statutory Consultees for a five week period of consultation. This stage is mandatory. Due to no informal nature of the IIA this stage was severely reduced and the Scoping Report was produced. The scope, aims and objectives and other relevant issues were discussed with stakeholders at a workshop and were further developed with feedback from the workshop and advice from the Project Steering Group.

The only significant comment on this stage of the process that needs to be made is that any future IIA process needs to recognise the time and resource implications of this phase if carried out in accordance with ODPM guidance, and the requirements of the SEA Directive.

- *Draft Environmental Report*

This is essentially a requirement of the SEA Directive. The IIA approach means that the Environmental Report is only a component of the draft IIA report since the scope of IIA is broader than the requirements of the Directive. IIA is far closer to Sustainability Appraisal at least in terms of scope. This is not a substantive issue since current ODPM guidance is clear on how the requirements of producing an Environmental Report can be met when carrying out a combined SA/SEA and the same principles would apply, we feel, to IIA.

In terms of the pilot IIA project a number of issues need to be raised;

- The project did not produce full environmental reports of each SRDF;
- The project did not assess 'significant effects' as required by SEA; and
- The project did not assess alternatives or options since the IIA did not start at the beginning of the SRDF process and there was also no detailed optioneering phase in the development of the SRDFs since this had been carried out as part of the London Plan process.

These are all issues that would need to be taken into account in any future use of IIA in a formal assessment process. None of these issues is a significant hindrance to the use of IIA but they do have timing and resource implications and would require any future assessment to be commenced at the start of the development of the plan or strategy to be assessed. This would need to be a feature of any assessment intended to be compliant with the SEA Directive.

- *Review of Final Options*

This stage in the IIA process was not carried out by the pilot project because no options were analysed. It equates, however, to the review of

the Consultation Drafts of the SRDFs carried out by the IIA team with the GLA planners, the LHC and stakeholders.

A review of final options would be a requirement for a formal assessment.

- *Finalisation of Assessment Report and Monitoring Framework*

Whilst the project produced a final report on the IIA of each SRDF these were essentially reports of the individual assessments and were not intended to be equivalent to an SA/SEA report. The IIA process can very easily deliver such reports.

Monitoring was raised as a key issue throughout the IIA process. It was an aspect of the SRDFs that was felt to be particularly deficient. Whilst the London Plan sets out a monitoring framework this did not assist in identifying how SRDFs would monitor their impacts at sub-regional level or demonstrate successful implementation.

In IIA terms this would mean that any formal assessment would need to raise significant concerns as to the likely impact of the plan or strategy and its effects on the environment and sustainable development objectives.

This is a critical issue for SA/SEA related assessments and any future IIA would need to be clear in its comments/recommendations on deficiencies in monitoring and how they should be addressed.

2.4

CONCLUSIONS

The pilot IIA project has contributed to the testing of the IIA methodology. It has been demonstrated that it can effectively meet the requirements of SA/SEA and is, indeed, more likely to assess sustainable development issues effectively than just SEA.

The IIA approach should be adopted for the assessment of regional and sub-regional strategies where SA/SEA is required by law or will represent best practice in terms of addressing sustainable development. It will not replace project level HIA or EIA but will allow the effective integration of health issues at the strategic level.

IIA also offers scope for the integration of Equalities Impact Assessment (EQIA) into SA/SEA and this should be actively considered in any future Integrated impact Assessment.

3 RESULTS

3.1 INTRODUCTION

In this section of the report we summarise the results of the pilot IIA project in terms of the application of the IIA methodology and feedback from stakeholders.

3.2 RESULTS FROM THE IIA OF THE SRDFs

The individual; assessment reports for each of the SRDFs are presented in Annex B of this report.

In terms of the Appraisal Framework the SRDFs were generally strong on:

- Promoting the principles of sustainable development
- Promoting key sustainable development issues from the London Plan
- Access
- Ownership
- Creativity

These strengths relate on the one hand to the close relationship of the SRDFs to the SD principles and aspirations set out in the London Plan and on the other to the key deliverables of SRDFs in terms of development land, housing and transport infrastructure as well as to a lesser extent social and health infrastructure.

The SRDFs were generally weak on:

- Deprivation
- Social Exclusion
- Resource Management
- Links with other regions/sub-regions

In general the SRDFs made only passing reference to issues of deprivation and the need to engage in development that would be likely to benefit the most deprived groups in each sub-region. Little or no use was made of IMD data and characterisation of the development needs of deprived groups and the spatial expression of deprivation within each sub-region was generally very poorly presented in the SRDFs.

One of the overarching concerns that has arisen from the assessment of the SRDFs is the lack of a focus on 'people'. This extends to existing residents and their needs as well as the characteristics of the new population and the spatial issues raised by the size and characteristics of that new population.

The issue of resource management which effectively covers much of the environmental component of SD was quite poorly developed in the SRDFs even where, as would be the case with for example waste management, there are direct relationships between sub-regional economies, competitiveness and resource efficiency. Whilst each SRDF has a section of the text that deals in broad terms with environmental issues and the environmental baseline this information was generally not well integrated into the rest of the document.

The London Plan and the SRDFs in theory have links with the spatial strategies and other plans of surrounding regions, in particular the South East and the East of England. In general, there was little or no recognition of these other plans and their relationships to the SRDF. In the case of issues such as housing, transport infrastructure and community plans there may be significant implications for SD.

3.3

KEY FACTORS AFFECTING THE OUTCOME OF THE ASSESSMENTS

A number of issues were fundamental to the outcome of the assessments. These are issues that need to be taken account in the future drafting of plans or strategies that will be required to undergo IIA or SA/SEA. The key issues were:

- Use of evidence
- Lack of information on the characteristics of new populations
- Monitoring frameworks
- Timing/nature of the IIAs

Each of these issues is discussed in greater detail below.

- *Use of evidence*

IIA like SA/SEA is essentially evidence-based. The use of baseline data and of evidence to support the policies and actions within the strategy, plan or programme are fundamental to the outcome of the assessment.

In terms of the evidence relevant to the SD objectives used in the IIA appraisal framework, there were significant weaknesses in the use of available social and health data in particular. This relates to the lack of focus on 'people' issues within the SRDFs. In addition, the lack of a completed Economic Development Strategy for most of the sub-regions created a significant evidence gap in terms of the links between infrastructure and land provision and the shape of the sub-regional economy.

It was also critical to the outcome of the assessments that the SRDFs did not have a clear structure in terms of 'where we are now', 'where do we want to get to' and 'how we will get where we want to get to'. This lack of a clear strategy meant that evidence was used in a largely ad-hoc way and created the impression that the SRDFs were not fundamentally

evidence based. This creates real problems for assessment tools such as an IIA or SA/SEA which, as has been indicated above, are essentially evidence driven (similar issues are discussed below in our analyses of issues relating to monitoring).

- *Lack of Information on New Populations*

The SRDFs contained little or no information on the characteristics of the new populations that the sub-regions were going to be accommodating and the issues this was likely to raise for infrastructure provision or the likely SD and health implications of the new population. This absence of information made it very difficult to carry out a detailed assessment of the likely impacts of the SRDFs on either future or existing populations. None of the SRDFs provided any description of what sort of community the SRDFs were seeking to create except in terms of the spatial allocations of some aspects of development and infrastructure.

- *Monitoring Framework*

The assessment of impact requires the use of both baseline conditions and indicators and targets to monitor expected and actual impacts and proposed mitigation measures. The lack of such a monitoring framework means that it is extremely difficult to assess what impacts are predicted, what would represent satisfactory performance and outcomes and also to what extent the assessment of predicted impacts has been accurate.

In the case of the SRDFs reference was made to the monitoring framework of the London Plan. In addition, sub-regions were also able to identify specific sub-regional indicators that could be used to monitor the outcome of the SRDFs. However, this meant that the SRDFs used for the pilot IIA project were essentially lacking both performance measures and an overall framework for implementation. This has meant that the assessment has had to raise questions regarding impact and outcomes and the overall implementation of the frameworks that could have been resolved had a monitoring and implementation framework been available.

- *Timing and Nature of the IIAs*

In general, the IIAs were quite well integrated into the process for the development of the SRDFs. The pilot nature of the project did not create any problems for the project in making a contribution to the development of the frameworks.

For a formal SA/SEA assessment process a more highly structured, interactive, process of parallel development of both the plan and the assessment would be necessary and the influence of the assessment on

the plan would need to be carefully recorded by the planners since it is a requirement of any process subject to SEA that these interactions are recorded.

3.4 *KEY ISSUES ARISING FROM THE PROJECT*

In this section of the report we focus on aspects of the IIA methodology, the project process and outcome and the SRDFs raised by stakeholders at the IIA workshops. Notes produced to record the key discussions at the workshops are presented in Annex C of this report. The key issues raised by stakeholders were as follows:

- The role of SRDFs
- Integration of sustainability concerns into sub-regional plans
- Appreciation of health as a sub-regional issue
- Use of the evidence base
- Clarity over how assessments of impact had been carried out
- Ongoing monitoring of the SRDFs
- Terminology

Each of these issues is discussed in greater detail below.

- *The Role of SRDFs*

The majority of stakeholders who attended the workshops were unclear as to the role and the status of SRDFs and were also unclear as to how the frameworks fitted into the overall planning system.

The use of boundaries that did not conform to existing planning or data collection zones was also viewed as being confusing.

Whilst some stakeholders once informed accepted the need for the SRDFs there remained a great deal of confusion as to their function. It was generally felt that this issue was not effectively communicated in the documents themselves.

- *Integration of sustainability concerns into sub-regional plans*

This issue also related to a lack of clarity as to the function of SRDFs. Many of the agencies and groups active in SD in London do not generally think or act in sub-regional terms.

The fact that the evidence base for many SD issues was weak or missing from the SRDFs did not help this situation. Many stakeholders clearly felt that more use could have been made of the available information on SD issues.

- *Appreciation of Health as a Sub-Regional Issue*

Stakeholders were keen to understand how health issues and health data had been taken into account in the development of the frameworks. Many Stakeholders were concerned that health data had not been used even when it had been offered.

It emerged that GLA planners had access to data provided by PCT's and others but that much of this data had not been used in the preparation of the SRDFs or where it has it was subsequently been removed during the ongoing development of the frameworks. It was recognised that more use could have been made of the available data on health issues at sub-regional level.

The project has highlighted that since the sub-regional boundaries were not SHA boundaries this caused some difficulty for the health sector in terms of its planning structures and coverage of issues. In the case of the GLA planners it was apparent that there was recognition that health-related issues did have a sub-regional dimension but that there was also a lack of awareness as to how SRDFs should address health issues beyond the allocation of physical infrastructure.

- *Use of Evidence*

There was generally a lot of concern from health sector stakeholders over the limited use of evidence relating to social exclusion, deprivation, health status and the 'wider social determinants of health'. It was felt that the SRDFs has not captured much of the relevant information on the existing populations within the sub-regions and had not adequately attempted to characterise the 'new' population that would move into a sub-region as a result of development.

Most stakeholders felt that as a minimum use should be made of IMD data. They also felt that groups such as HUDU should be key sources of information for the evidence base. In addition, where relevant, health sector initiatives which would have an impact on the frameworks should also be included.

The lack of a 'people' focus in the SRDFs was commented on by a number of stakeholders who were keen to see a far closer relationship between infrastructure and development proposals and residents of the sub-regions.

- *Clarity of Assessments*

Many of the stakeholders who were involved in the workshops had not had any previous involvement in the pilot phase of the IIA project. Whilst many of the stakeholders were very well aware of HIA and/or

EQIA they were not really aware of what IIA was about or how it 'fits in' to, for example HIA or vice versa.

It was not possible in the context of the workshops to provide stakeholders with a detailed description of the IIA methodology or lead them in detail through the assessment of the individual frameworks. This meant that stakeholders were uneasy about how the 'scores' in particular in the appraisal matrices had been derived. This uncertainty was only compounded by the majority of the stakeholders being unfamiliar with the SRDF documents too.

- *Ongoing Monitoring of the SRDFs*

Many of the stakeholders at the workshops raised concerns as to how the impacts of the SRDFs would be monitored given the lack of any specific monitoring frameworks in the documents themselves. They were also generally unaware of the monitoring framework for the London Plan.

A number of stakeholders felt that it would be important to have sub-regionally specific indicators and performance measurement targets.

- *Terminology*

It is questionable that having the term Integrated Impact Assessment adds much to the method or its likely acceptance at a time when there is already an unhelpful proliferation of titles for methods seeking to comply with SA/SEA requirements. We would suggest dropping the title but formalising the method and promoting it amongst partners in London. The GLA and LHC have ample opportunities to engage with partners on this issue.

3.5

KEY LESSONS LEARNT

From this phase of the IIA project it is possible to identify a small number of key lessons that should be incorporated into any further development or applications of the methodology. These can be summarised as follows.

- *Engagement with plan authors is vital*

The ability to interact with plan or strategy authors in an interactive process is fundamental to the value of the SD outcomes. During the pilot project the relationship between the GLA planners and the assessment team was strong and allowed for extremely useful exchanges of ideas and information.

Early engagement is particularly important since, at least for formal assessment processes, it will be necessary to discuss appraisal objectives

and questions, identify concrete options or alternatives to be appraised and discuss the relevant evidence base and policy context. Retrospective assessment is always very obvious and is not compliant with SA/SEA requirements. It is important that both teams can document the influence of the assessment on the plan or strategy. The authors of plans and strategies should be involved in assessments from the very start and the same holds true for the engagement of assessment teams with plan and strategy processes.

- *Stakeholder Inputs*

The involvement of stakeholders in this pilot project has been enormously valuable to the IIA methodology and process. Clearly there are strict legal requirements governing the involvement of stakeholders in SEA but it is useful to go beyond these requirements and involve a wide range of SD stakeholders at key stages in the process.

- *Influence of Assessment on the Plan Process*

We have already indicated that interaction with the planners has been a vital component of the pilot project. It is also very important that the influences of the assessment on the plan can be demonstrated (especially for the SEA Directive). This is best managed via a detailed record of the interaction between the development of the plan and the delivery of outputs from the assessment. In a formal assessment process it is necessary to create this 'audit trail' from the start of the process to meet the requirements of the SEA Directive.

An audit trail of this type would have greatly facilitated the final assessment of the SRDFs.

- *Tailoring of Appraisal Questions*

It is important that the detailed questions in the appraisal framework reflect the focus of the plan or strategy being assessed. This will require detailed joint working by the plan authors and the assessment team so that it is clear on what basis and from what perspective the assessment is being carried out.

This project has also benefited from the inputs of a wide range of stakeholders into the development of the Appraisal Framework and of appraisal questions including their detailed wording.

- *People and Environment Aspects of Planning*

From the pilot project it has been quite clear that the sustainable development aspects of spatial planning are not necessarily common ground between planners and sustainable development specialists. This simply reinforces the need for close working on assessments to create a

common understanding of the planning and SD issues. This understanding should not be taken for granted. This is equally true for health issues.

4 RECOMMENDATIONS ON THE FUTURE USE OF THE IIA METHODOLOGY

4.1 INTRODUCTION

In this section of the report on the IIA Pilot Project we present a number of recommendations relating to the future use of the IIA methodology.

There has been a greater deal of positive learning from the pilot IIA project and this needs to be built upon in future assessments of key plans and strategies. Dissemination of the methodology should be an important task for both the LHC and GLA.

4.2 RECOMMENDATIONS

Based on the experience gained in implementing the pilot project we would make the following recommendations:

1. that future integrated assessments processes build-in time to allow the planning/strategy team and the assessment team to work together in an interactive fashion.
2. that the name Integrated Impact Assessment is dropped, it is not helpful.
3. that the methodology is summarised in an accessible form that clearly demonstrates its compliance with SA/SEA requirements but also its added value in terms of the integration of health issues.
4. that the methodology is not seen as a replacement for HIA but that they continue to co-exist. IIA has demonstrated how health issues can be integrated into Strategic processes. HIA is still invaluable at project level.
5. that more research is carried out to identify mechanisms that facilitate the collection and analysis of health data.
6. that EQIA is incorporated into future assessments.
7. that the GLA/LSDC/LHC produce guidance on how IIA can effectively integrate health issues for dissemination to partners in London.

