

Royal Institute of British Architects

Department for Levelling Up, Housing and Communities - Environmental Outcomes Reports: a new approach to environmental assessment
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The Royal Institute of British Architects is a global professional membership body driving excellence in architecture. We serve our members and society in order to deliver better buildings and places, stronger communities and a sustainable environment. Being inclusive, ethical, environmentally aware and collaborative underpins all that we do.

The Royal Institute of British Architects (RIBA) welcomes the opportunity to respond to the Department for Levelling Up, Housing and Communities' (DLUHC) consultation on the Environmental Outcomes Reports (EOR) proposals, which outlines the initial plans for a new approach to environmental assessment.

The climate emergency demands urgent action and leadership by the Government, architects and the wider construction industry. We welcome progress to date, but we need to move further and faster if we are to reach net zero and protect the environment.

Environmental assessments play an important role within the planning system to limit the negative planetary impact of the built environment, halting biodiversity loss and meeting environmental targets. Getting this right is one of the most important tasks the Government faces. Wrong decisions at this and future stages of development could be detrimental to the environment. We are concerned that the merging of Environmental Impact Assessments with Sustainability Appraisal could oversimplify what is a complex interrelationship of issues and risks local environmental and ecological standards.

The RIBA recommends that the Government:

- Includes assessing climate change as part of the EOR system as well as impacts on human health.
- Engages extensively with stakeholders across the built environment sector to guarantee an effective and thorough regime.
- Ensures planning departments are sufficiently resourced to handle the additional challenges of adapting to a new regime.

RIBA 
Architecture.com

Royal Institute of
British Architects
66 Portland Place
London, W1B 1AD, UK

Nell Brown
Senior Policy Advisor
helena.brown@riba.org

Q.1. Do you support the principles that will guide the development of outcomes?

The principles that will guide the development of outcomes are currently high level. Given there is still much to be developed in terms of the EOR regime and how it works in practice, this is still difficult to assess.

The outcomes will align to the Environmental Improvement Plan 2023 (EIP23). However, if outcomes are not selected from beyond these relatively narrow themes, important issues will likely be excluded.

We think that the EOR regime should also align to the UN Sustainable Development Goals that relate to the built environment. It must incorporate topics such as clean energy, good health and well-being, sustainable cities and communities, responsible consumption and production, and climate action.

The changing climate is a growing threat to the environment. Failing to recognise and address this within the new EOR regime framework risks environmental protection. We also cannot ignore the importance and interlinking of the built and natural environments on population and human health, which is a critical element of the existing environmental impact assessment system. Excluding population and human health outcomes will make it more difficult to holistically assess how developments, including their cumulative effects, could negatively impact health and wellbeing.

The entire EOR regime will have to be ambitious and flexible – local councils will need to be able to learn and adapt, and the regime must enable them to go further and faster to deliver environmental protection.

Q.2. Do you support the principles that indicators will have to meet?

It is important that the Government does not unnecessarily reinvent the wheel when developing the detail of the new EOR regime. It is currently hard to assess whether the principles that indicators will have to meet are comprehensive enough, without understanding what the outcomes themselves will be.

Q.4. Would you welcome proportionate reporting against all outcomes as the default position? [and] Q.5. Would proportionate reporting be effective in reducing bureaucratic process, or could this simply result in more documentation?

We do not yet know how many outcomes will be included nor how many indicators will be attached, so it is not easy to assess what barriers might arise and what the best approach may be. Critically, the new EOR regime should improve on existing processes and not extend existing burden or pressure on local authorities.

Q.6. Given the issues set out above, and our desire to consider issues where they are most effectively addressed, how can government ensure that EORs support our efforts to adapt to the effects of climate change across all regimes?

The EOR system will need to embed specific outcomes relating to climate change, such as adaptation. To ensure we can adapt fully to climate change, we will need to identify the greatest risks, such as flooding or biodiversity loss. By including climate adaptation within the EOR system

itself, it will be much easier to ensure government climate response efforts are joined up, in this context, across Government departments.

Q.15. Would you support a more formal and robust approach to monitoring?

Yes. It is right that the Government takes a formal and robust approach to monitoring and ensures the effective implementation of EORs.

An effective monitoring approach is a necessary part of the whole regime. When done correctly, it also ensures that future decisions about how the regime can be improved are properly informed.

Q.19. Do you support the principle of environmental data being made publicly available for future use?

Yes.

Q.22. Would you support reporting on the performance of a plan or project against the achievement of outcomes?

Yes.

Q.24. Once regulations are laid, what length of transition do you consider is appropriate for your regime?

It is vital that the Government undertakes significant and detailed assessment of how the EORs regime will be integrated and work alongside existing legislation in Scotland, Wales and Northern Ireland. A test and learn approach, as well as extensive sector engagement on the proposed outcomes, will be essential.

Q.25. What new skills or additional support would be required to support the implementation of EORs?

Planning departments must be sufficiently resourced to handle the additional challenges of adapting and implementing the new regime. As with other resourcing gaps across the planning system, thought will need to be given to how any new staff recruited to planning departments are appointed and competitively remunerated.

Proper cost modelling should be undertaken, with support offered to ensure the workforce is fit for purpose and environmental assessors have the rights skills and training to enforce the new regime when it comes into force. It is important that local authorities have the funding and resources to recruit effectively.