



**IEMA ENVIRONMENTAL ASSESSMENT FORUM  
2008**

**Cumulative Impact Assessment in EIA and SEA**

1. Cumulative impact assessment requires a clear understanding of what our development is likely to cumulate with. This is probably more straightforward in EIA than in SEA.

A useful ground rule in EIA is that the environmental effects of any other development that is already built and operational is effectively included within the environmental baseline that you are assessing against in the EIA, so is excluded from the cumulative impact assessment, otherwise it would be double counted. However, projects that are in the planning process need to be considered. Any that are in front of ours, i.e. likely to be submitted or receive consent before ours, we must take into account in our cumulative assessment. Any that are substantially further back in the planning process and are unlikely to be submitted or get consent until after ours, we can disregard because the developer of that project should be taking the effects of our development into account in his or her EIA.

*Q: Do you agree with this general approach?*

*Q: Do you have alternative suggestions on how to take cumulative effects into account in EIA?*

2. SEA involves us looking at cumulative impacts at two levels – inter-plan and intra-plan. The former is easier as it requires an assessment of the potential cumulative impacts of the different measures, options or actions that comprise our overall plan or programme, and we should have enough information about the options to be able to work out if they will cause additive or synergistic effects when implemented as part of the same programme. It is also within our remit to define and implement mitigation of these cumulative impacts.

Intra-plan cumulative impacts are more difficult to assess but are arguably the whole raison d'être of SEA – to make sure that we identify and avoid or mitigate large scale impacts from concurrent plans or programmes, because once these have started to be implemented, it will be much harder to iron out any major problems caused by two conflicting sets of actions. However, identifying impacts is not always easy, as the most relevant plans are not always at the same stage as ours, thus information may not be available from plans “behind” ours, while plans that are “in front” of ours may have already been adopted and implemented, so there is less potential to change these if they have cumulative impacts with ours. Furthermore, the SEA may conclude that the best mitigation measure is for someone else to change an element or elements of their plan, rather than us changing ours.

*Q: How can we take timing into account, where plans or programmes with potential cumulative impacts are at different stages of development? Is there a parallel with EIA?*

*Q: If we can identify impacts and appropriate mitigation measures, who should be responsible for implementing them? Are we restricted to only those mitigation measures that we can implement through our plan?*

*Q: How does the SEA Directive deal with these issues?*