Embedded mitigation & heritage assets: how to influence design and win friends

Julia Bennett Smith, from Chris Blandford Associates, considers why it is important to capture embedded mitigation for heritage assets within Environmental Statements.

Unpicking what constitutes mitigation within the cultural heritage chapter of an Environmental Statement can be a tricky business. Should we call it mitigation or are some aspects just well-considered, sensitive design. Can environmental disciplines ‘share’ elements of mitigation? What types of design solutions could reduce or avoid impacts on heritage assets and what do we need to know before we suggest them? Let’s try and unravel some of the thinking and challenges behind approaches to mitigation for cultural heritage.

The EIA Regs describe mitigation as “measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment”. So should the process of design refinement be reported under mitigation within the ES? Quite simply, yes it should. With sufficient information, collaboration and professional expertise, this iterative design process can reduce or totally avoid significant effects on heritage assets. These preventative measures whilst part of the considered design process, are sometimes termed as ‘embedded mitigation’ and we need to not only be reporting it, but influencing it.

It is crucial to draw these factors out within the ES as this is part of the purpose of an EIA, i.e. to encourage this iterative and inclusive design in order to engineer a less harmful proposal. It is also a persuasive narrative that communicates to decision makers how a developer has considered the heritage assets early on in the process and invested in altering a scheme to lessen those possible impacts.

What is absolutely crucial at an early stage is to understanding the significance of heritage assets which may be affected and the contribution made by their setting as outlined in England by the National Planning Policy Framework (2018). Without this comprehension it would be inappropriate to consider what design change mitigation may be suitable to lessen effects. Married to this is the need to understand the initial scheme proposals in detail. Finally, getting the timing right to engage in discussion with designers is the final part of the equation i.e. early enough to be able to influence design at a helpful stage with some understanding of the heritage assets already in place.
So, you now understand your scheme proposals, the broad significance of the heritage assets and at an early enough stage to engage with the team. What ways could ‘embedded’ mitigation reduce or avoid significant effects on heritage assets? Options may include:

- Designing schemes at suitable buffer distances from sensitive heritage assets – this will vary from asset to asset depending on its significance.
- Designing a scheme to avoid direct physical impacts e.g. using alternative construction methods or changing the development footprint.
- Reducing the size and scale of development.
- Optimising the appearance of development so that enhances the character of the area and conserves heritage assets where possible.
- Using engineering solutions to reduce an impact e.g. low noise surfacing, lower profile structures and masts, painting new infrastructure in more complementary colours.
- Using landscaping solutions to reduce an impact e.g. bunding or planting vegetation to screen.

Elements of potential ‘embedded mitigation’ will be suggested by a range of environmental disciplines (bunding, screening, noise barriers) who will have to work together to optimise the design proposed where possible. These could be utilised be utilised to reduce the visual impact on setting of sensitive heritage assets. It only counts, however if the setting of an asset is sensitive and the location of the bunding really does lessen that impact. They key here is discussion with colleagues about what mitigation they may be proposing and how it could be tweaked to offer other solutions.

Often these things aren’t highlighted well enough in the ES and I believe need to be within the relevant discipline chapters and not just the more introductory chapters at the beginning. Decision makers and their technical advisors have a lot of information to read and it makes sense to see a chapter which accurately and persuasively identifies heritage assets, understands their significance including their settings and sets out what has already been explored and ameliorated within the design through good practice and effective dialogue. This helps in reporting an honest, transparent process of a well-designed scheme as per Commitment 5 of the IEMA EIA Quality Mark Scheme.

*Julia Bennett Smith is a Senior Associate at Chris Blandford Associates, July 2018.*