**Cultural Heritage EIA on large infrastructure projects**

**Jim Mower from Environmental Resources Management** provides a practitioner's view on issues surrounding impact assessment for major infrastructure projects in the UK.

**Introduction**

Environmental Impact Assessment (EIA) for cultural heritage in the UK is well established within a legislative and policy framework. This framework is supported by detailed guidance on specific heritage issues produced by UK regulators and heritage organisations. Although EIA methodologies have been developed in the infrastructure space (such as the Design Manual for Roads and Bridges produced by the Highways Agency in 2007), cultural heritage specialists are required to develop a bespoke approach on a project by project basis.

At present the UK government is engaged in several large rail infrastructure projects, designed to improve journey times, relieve pressure on the existing rail network and link to similar, modern rail systems across Europe. ERM is engaged in multidisciplinary EIA work for a number of these projects. The unprecedented scale of work in the rail sector results in unique challenges for EIA practice.

**Proportionate EIA**

Approaching EIA on exceptionally large projects over an extended timescale demands a proportionate approach and an acceptance that a traditional, perhaps overly detailed approach may not be appropriate.

This is due to challenging programme demands and a large baseline which has the potential to become impractical for reporting purposes. In addition, the UK government encourages a proportionate approach to EIA reporting to ensure clarity in the presentation of results and in the avoidance of successful petitioning against a particular project. This, fundamentally, is the avoidance of risk.

Proportionate EIA does not mean a simplification in method or approach, neither should it imply that detailed assessment would not take place. Rather, it is concerned with the development and application of a clear EIA method and the presentation of results in as transparent a manner as possible.

ERM has developed a proportionate approach during recent projects on behalf of its clients through the production of Environmental Statement (ES) templates linked across multiple volumes. On large-scale projects, the size of the ES can present issues of scale for both the client and the regulator when discussing potential impacts with wider statutory and non-statutory stakeholders. One solution to this challenge has been to report certain ES material, particularly tabulated information and the results of baseline data collection, in an entirely digital format. Technical solutions to issues of scale have also been developed including the use of databases to automate baseline compilation and assessment. This allows tabulated aspects of reporting to be automatically generated, thus alleviating programme challenges and enabling transparent cross-referencing for stakeholders.
**Ongoing guidance**

While technical guidance on various aspects of heritage assessment has been developed by regulators and heritage organisations across the UK, proportionate assessment may require further specific technical guidance to be developed for authors. ERM’s EIA work on larger projects has required supplementary guidance for the large number of authors working on ESs comprising multiple volumes. This approach may be outside the norms of typical EIA on smaller projects. Often, it is only when templates are filled out for the first time and the system is ‘stress tested’ that aspects are revealed requiring refinement. Therefore, it is essential that authors are engaged in and understand the approach to EIA, throughout the process.

**Responding to change**

A feature of large infrastructure EIAs is that they are often developed over a number of years. They are therefore subject to design changes, shifts in legislation, policy or guidance and changes within the team producing the ES. Change management is a crucial element of an overall approach to EIA on such a project. Responding to change can be complex given the limitations of programme and budget. For the purposes of large-scale rail projects ERM has developed a series of change management processes that track and monitor changes in scheme design, baseline and regulator guidance. These processes are strengthened by regular interface meetings between the client, EIA project managers and the ES authors. This manages the risk presented by the change that is inevitable in any large project.

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This article was written as a contribution to the EIA Quality Mark commitment to improving EIA practice

Jim Mower is a Senior Consultant with the UK and Ireland Cultural Heritage team at ERM, specialising in EIA, April 2019.