Are we underselling the benefits of EIA?

As EIA practitioners are we getting the balance right between the adverse impacts and the positive impacts of a scheme? Throughout a project, we go to great lengths to manage down and avoid environmental risks and impacts, while still delivering good design, meeting the needs of local planning policies along and the three requirements of sustainable development, as referenced within the National Planning Policy Framework.

However, when it comes to reporting on the Environmental Impact Assessment (EIA) process, Environmental Statement (ES), running into hundreds of pages, are often focused on the adverse impacts of a proposed development.

This is where LDA Design strongly believe the industry is generally underselling the role of EIA and missing the opportunity to demonstrate what has achieved through environmental enabled design. LDA Design’s approach to all EIA projects is underpinned by our firm belief that landscape is a fundamental building block of a place. It is this insight that allows LDA Design to influence the design of a development bringing together all the different environmental strands that make up the landscape of a particular place. It is this thought process that must be captured within Environmental Statements demonstrating that EIA is not just an administrated assessment tool undertaken at the end of the planning process.

Standard practice within ESs is to document the effects of a proposed development prior to the consideration of mitigation, followed by ‘residual effects’ which remain after the implementation of mitigation for each technical assessments. Such an approach often identifies theoretical impacts ignoring primary mitigation and conclusions focussing on residual negative effects. As professionals we need to remember that each of the technical assessments are assessing a scheme which already has a number of benefits embedded within the design which avoid negative effects, such as landscape planting, habitat creation, earth bunds etc. As custodians of the ES, we need to ensure that the consultees have a clear understanding of how the scheme has evolved to avoid adverse effects and that the project team has considered the environmental landscape from the outset of the project. Without this information, the reader will be presented with a description of the proposed development and a list of adverse impacts instead of a balanced view of the proposed development.

So how do we change the reader’s perspective from ‘this scheme results in numerous adverse effects’ to ‘this scheme has gone a long way to addressing the environmental effects and on balance has limited adverse environmental effects.’

LDA Design believe this can be achieved through the presentation of the environmental information within the ES.
We recognise that the ES needs to include a description of effects in an objective and robust manner but this does not mean the ES cannot be used to promote the environmental benefits or demonstrate how impacts have been avoided within the design iteration of a proposed development.

The new EIA Regulations 2017 (regulation 18(3)) clearly set out that an ES needs to include a ‘description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics…’.

Common practice within the UK is for ES’s to include an alternatives chapter but these often focus on alternative sites, technologies or land uses but doesn’t necessarily include detailed information on design evolution of the proposed development which can equally be considered as a reasonable alternative.

To help capture this information, LDA Design has established a design log to keep a record of how the design has been shaped by the site’s environmental landscape. We have found the log invaluable when it comes to drafting the ES as project programmes can often span many months and even years, so it is very easy to forget the minor design changes that have occurred over this time. The log also acts as a usual reference point throughout the project and can be used to make sure that design changes are not inadvertently undone during the course of the project.

The purpose of the Environmental Statement is to document the EIA process, so it would seem logical to present the information on design iteration prior to the description of the proposed development within the ES. LDA Design believe this helps to balance out the reader’s thoughts and gains greater ‘buy in’ from stakeholders as they are able to understand the rationale and design narrative in reaching the final design.

Otherwise, there is a risk that stakeholders could read the project description and react with ‘I wouldn’t have designed it like that’ or ‘have they considered x, y or z…’. By providing design iteration information up front in the ES along with the main reasons for the options chosen, it enables the ES to take stakeholders along the same journey and decision-making process as the EIA Team.

An additional benefit of including a chapter setting out the design narrative and framework is that it also helps deliver proportionality and consistency. This enables each of the technical assessments to reference the design evolution chapter and avoids generic, unnecessary and contradictory repetition within the ES, which helps gain further buy-in from stakeholders.


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