**EIA Quality Mark**

**Article**

| Vibrant and readable Environmental Statements Part 1:  
Is achieving a readable ES worth the extra effort? |
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| **Who is passionate\(^1\) about EIA?**  
From foodies to footie fans the adjective ‘passionate’ is simultaneously trendy and toe-curling. By contrast, ESs are intentionally dispassionate, but that mustn’t mean so disinterested that even the quality reviewer has obviously failed to stay awake (a giveaway is when directions such as [delete as appropriate] appear, or a completely different project name appears thanks to cut-and-paste – more on that below).  
What do we know? The ES is not there to promote the project. It is there to describe the evolution of the project, to give the readers comfort that the environmental concerns have been identified and adequately taken care of. Good projects will also radiate confidence explaining how the environmental outcomes will be better than what is there at present, or likely to be there in the future.  
**So why are some ESs so formulaic?**  
Some ESs that we get to review might be technically correct but they are so boring, disjointed (often due to injudicious cut-and-paste from the ESs for other projects), and with so little consideration given to the reader that even the author appears to struggle to remain connected to the developing storyline.  
There is a lot that we can learn from the innovations applied to the retelling of the EIA of major infrastructure projects; they have to be innovative in their quest for clarity because of the multiple complexities over a large spatial area combined with the certainty that the document will be scrutinised very, very critically.  
One reason why poor ESs fail in this respect is because they have seemingly one dimension, which is to satisfy the receptor related requirements of the EIA Regulations. What they don’t do is make the connection between the project’s Communications Strategy and the readership of the ES!  
**Here is a fictional example:**  
“Two public stakeholder meetings were held [insert date and place]. The attendees were shown drawings of the intended scheme. Any concerns were noted.”  
The worst offenders deal with consultations thus. Nothing specific about the concerns, nothing at all about how the concerns have influenced the decisions made in connection with the project, and nothing to demonstrate that the concerns have been allayed. There may well be a section on population in the ES, another silo where the landscape architect’s conclusions on the impact of the projects is inserted, following the LI industry guidance. Biodiversity is dealt with according to IEEM’s EIA methodology in the next chapter.  
Even if the answers are there, does it inspire confidence in the process that the reader has to figure out for themselves whether a) the standard methodology is capable of meeting their needs, and b) is the answer that they seek in the assessment somewhere. |
There is a c): the formulaic approach falls down when ‘de-siloing’, so risks failure to describe the project outcomes and unintended consequences in the integrated and environmental process focussed consideration required by ecosystem services assessment and consequent conservation of Natural Capital assets. And d): formulaic ESs tend to focus on the ‘things’, for example the footpath length affected, rather than what makes them so important to those who value them. We could go on through the alphabet.

What do we conclude?
There is scope to rearrange the elements that comprise the ES ‘formula’ to enable the reader and/or user of the document to reach a clearer ‘answer’ more easily. Even if it does mean that there is a detailed appendix for every letter of the alphabet, does that matter if the ES main document is agile, clear logic supports the story of the impact of the proposed development, not just on the receptors, but on how they interact. We now have Defra’s 25 Year Environment Plan, with the emphasis on natural capital and ecosystem services. So this is our challenge. Do we try to bolt on the consideration of the issues as an ecosystem services assessment? Or do we embrace the opportunity that this political imperative provides to use this new paradigm to (a) justify the most environmentally beneficial option through the appraisal using the data and analysis collected via the EIA process, and (b) replace any static designations-based ES reporting with a story about how the project will:

- use and manage the land sustainably
- enable the recovery of nature and enhance the beauty of landscapes
- connect people with the environment to improve their health and wellbeing
- increase resource efficiency and reduce pollution and waste


1 By passionate we mean the definition adjective having, showing or caused by strong feelings or beliefs. If you feel that the alternative, ‘intimate’ definition of passionate applies in your case, then you may consider seeking professional counselling.

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