The role of Environmental Enhancement Strategies in helping secure planning permission for EIA schemes

| Upon submission of an application which comprises an Environmental Statement (ES), the Planning Authority and consultees are often faced with a huge amount of documentation detailing the proposed scheme. There can be a myriad of specialist technical reports, which often conclude with a series of adverse impacts, and prescribed mitigation to address effects, but there can be a reluctance from developers to promote benefits and enhancement. The scales are therefore seemingly tipped against the proposal, and this is when an Environmental Enhancement Strategy (EES) can seek to redress the balance and promote a good news story. Developers often seek to provide some form of financial benefit in the form of a Community Benefit Fund rather than focusing on tangible environmental enhancements, however the provision of such a fund is not a material consideration for the Case Officer or for Committee members, and can often be misconstrued as a bribe! Therefore, the long-term provision for the improvement of the environment should be considered as a fundamental aspect of each EIA (or non-EIA) application. |
| An initial draft of the EES can provide an opportunity to seek early engagement with consultees, in an attempt to secure their involvement in the scheme and to initiate a sense of ownership of the proposals. Likewise, there is the opportunity to engage with specialist Local Authority Officers to discuss landscape, heritage or ecological benefits. Having a draft of the EES ready to display at Consultation events at the pre-application stage, can focus attention on the positive aspects of the scheme and encourage discussion and involvement from the local community, with an eye to incorporating aspects that are of local importance. As an example of the benefits of early engagement, at the now constructed Lynt Farm Solar Park near Highworth in Wiltshire, the community expressed a desire to see increased footpath routes through the site to an adjacent Local Nature Reserve, to enable them to safely access the wildflower meadows. They were also vocal about the need for safe dog walking routes which could be provided within the boundaries of the solar park itself, to decrease the need to use the verges of a very busy A road. The EES for this site therefore included much needed and valued access for local people, and was positively viewed by the Local Authority and Committee members at the decision stage. Without the positive reinforcement of the EES supporting the EIA application, the proposals may well have been viewed in a different light by the decision makers... |

So what benefits can an EES bring to your EIA application? Well now that the 2017 EIA Regulations require the provision of more up-front mitigation at the Screening and Scoping stages, the early preparation of an EES can go a long way towards helping secure buy in from decision makers, and the local community.
At the committee decision stage, an EES can be an incredibly useful tool if distributed to Members in advance of the Committee as it can promote the positives of the proposals in non-technical language outside the terminology of the Environmental Statement.

The National Planning Policy Framework (NPPF) provides some guiding principles for environmental enhancement:

- Take account of local character (para 58)
- Integrate development into natural environment (para 61)
- Opportunities for sport and recreation (para 73)
- Opportunities to incorporate biodiversity (para 118)
- Flood risk adaptation measures within green infrastructure (para 99)
- Plan for enhancement and management of green infrastructure (para 114)
- Encourage multiple benefits from land which can perform many functions (9/12 principles)

To ensure positive mitigation and enhancement of the potential negative impacts as identified within the EIA, the EES should seek to promote local character, reinforce and sustain local distinctiveness, and contribute to a sense of place. By designing and incorporating a network of green spaces within the scheme proposals at an early stage, the EES can promote increased and improved access in the form of green infrastructure for local communities.

However, as Consultants we must be cautious of promising too much and failing to deliver! The benefits and enhancements must therefore be tangible and deliverable within the economics and practicalities of the scheme, and commercially viable for our clients. It is worth promoting these strategies at an early stage with developers, so that the EIA screening decision doesn’t seem like such a negative as it is often viewed. There are always ways to improve and promote an EIA proposal!

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