A research study was undertaken to improve the quality of Environmental Impact Assessments (EIAs) with a focus on achieving more proportionate Environmental Statement’s (ES’s). To improve the quality of ES’s the scoping phase provides the best opportunity and therefore a focus was taken on the scoping stage. Onshore wind farms have a reputation of being a 'planning problem' and so provides a case to investigate whether scoping quality and approach varies between development sectors. IEMA (2011) suggest three reasons for ‘ineffective’ scoping; risk aversion, poor planning and commercial reality of the sector, where in this research each of these was considered with regards to onshore wind farms. Qualitative research in the form of six semi-structured interviews and an online questionnaire was used to gather the opinions and thoughts of thirteen EIA consultants.

The results from this study indicated that onshore wind farms are less inclined to suffer from poor planning, this was attributed to the maturity of the market and the experience of developers allowing adequate time and providing established design plans for EIA. Findings also suggested that more experienced consultants tended to work on such projects due to the contentious nature and scale of onshore wind farm developments. Experienced consultants showed little evidence of being environmentally risk adverse due to their environmental confidence from their acquired knowledge and experience.

The commercial reality of the sector included researching into the attitudes that consultants have to a request for further information, known as a Regulation 22 request. It was found that concern arises from a Regulation 22 due to the fact it will cause project delays for the developer but also could have reputational damage for the consultants themselves. Interestingly, the fear of a Regulation 22 was not felt by all consultants, with some senior consultants with many years’ experience having no awareness of what a Regulation 22 is.

A suggested reason for this is that as Regulation 22 will impact the developer mostly, specialist chapter authors who may not deal with clients directly, may not feel this pressure compared to an EIA coordinator who may typically work much closer with the client.

Another commercial reality of the sector that may be contributing to a broad scope was the mixed responses on the quality of feedback from statutory consultees, those who felt they were mostly of poor quality typically having the opinions they are vague and generic and thus not tailored to the development. IEMA (2011) found that practitioners believe that further information relates to issues that could have easily been highlighted much earlier in the process and supports this study's findings. The reasons for the poor quality were largely identified to be due to a lack of resources and knowledge. This has led to the increased commissioning of scoping opinions by external consultancies. Whilst there was some positive feedback on the quality, many consultants who have received scoping opinions from external consultancies had a very negative view on the feedback stating that they were often “very picky” and appeared fee justifying with reams of comments and little useful advice.

In order to achieve a scoping report and thus an environmental statement that is proportionate and focusing on the likely key significant effects, a high quality scoping opinion that is tailored to the development may be required. If scoping opinions were to improve and give confidence to consultants that potential issues will be highlighted to them at scoping stage it may help them to have the confidence to scope less broadly. However, many statutory consultees suffer from a lack of funding and resources, therefore it is likely that scoping opinions will only get worse before they get better. However, this is seeing an increase in external consultants being commissioned to review documents.
As consultants will have the technical knowledge and funds to produce a timely quality scoping opinion this could allow consultants to improve this aspect of scoping. It would be beneficial for external consultants when reviewing documents to seize this opportunity to create constructive responses rather than use their knowledge to be “picky”. As consultants may not necessarily have experience in providing feedback, there may be a need for guidance on how to produce a beneficial review.

Another aspect of EIA, which is thought to be contributing to a lengthy ES is the increasing amount of best practice guidelines being published. Whilst it is important to recognise that best practice guidelines can bring standardisation and strengthen findings, many consultants felt that you can have ‘too much of a good thing’ as increasing guidelines was largely considered to be a cause in the increase in ES length. It may be beneficial for there to be an increase in published guidance around “proportionality” and tailoring the guidelines around likely key significant issues.

Yasmin Spain: Student Intern, WYG, September 2015.

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