

Impact Assessment Outlook Journal
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Perspectives upon Proportionate EIA

Thought pieces from UK practice



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Proportionate EIA in Perspective

I'm honoured to be Guest Editing this new edition of IA Outlook, returning after a 15-year hiatus. If you remember the original series, firstly well done, secondly, you'll recall it was a concise publication aimed at spreading IA learning and views across practice. I found a copy in IEMA's old library as we sifted through many copies of old Environmental Statements (ES), before IEMA moved offices in 2012.

Despite the original's age, I found it an engaging and interesting read. I was also struck by the similarity in aspiration and advice between it and the, at the time, newly published online articles by EIA Quality Mark registrants. A concern with the latter was that over 50 articles were being published annually, but few members/wider professionals accessed them.

My ambition, at that stage, was to re-launch the IA Outlook series in 2013 - on the 10th anniversary of its last issue. The new series would act as a means of showcasing key Q Mark articles and highlight the existence of the growing library of other documents. Unfortunately, that did not quite happen as my attention was drawn toward a more pressing matter for UK EIA practice. The growing ES obesity crisis and the need for IA professionals to set the agenda on defining and acting to deliver Proportionate EIA.

With the UK's first Proportionate EIA Summit in 2016, and the subsequent IEMA-led collaborative Proportionate EIA Strategy launching in summer 2017, it was the right time for me to leave IEMA's staff and return to a volunteering role, via its great IA Network Steering Group (SG). At my first SG meeting as a volunteer, I recalled my aspiration to bring IA Outlook back, initially using Q Mark written pieces (the library having grown to >800 articles/case studies), with the option for members to contribute their own pieces as the series returned to full strength. The SG and IEMA Headquarters were supportive of the idea, as a result, on the 15th anniversary of its last issue, I am greatly pleased and honoured to share this 1st issue of the new IA Outlook Journal with you.

Which leads us onto the pieces I have drawn out of IEMA's EIA Quality Mark article library providing six perspectives on the topic of... Proportionate EIA – what else!

Mike's article gives a great overview of IEMA's Proportionate EIA Strategy, asking how we can quickly and feasibly make progress.

John provides us with an engaging dual perspective linking changes in the energy sector to the need for proportionate EIA.

In his piece, Calum sets out how EIA can draw and link to other Environmental Management tools to deliver improved performance.

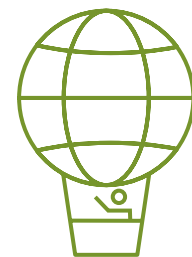
Elizabeth reflects on a specific case study to set proportionate EIA in context, asking how quality fits into the debate.

The penultimate pieces move to the inevitable question of how to make ES more effective, as Tom draws on CBRE's experience.

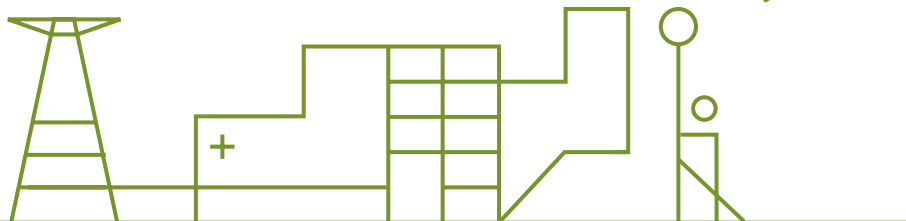
For the last piece, I've selected the first of a two-part article, encouraging you to read Part 2 and other articles online. The article sees Deborah discuss how to make ES engaging, interesting and accessible to readers.

I hope you enjoy the new IA Outlook Journal.

Josh Fothergill



*...six perspectives on the topic of
Proportionate EIA – what else!...*



Effective & Proportionate EIA's: achievable or simply pie in the sky?

The recent IEMA publication "Delivering Proportionate EIA – A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice", and the UK's first Proportionate EIA Summit (April 2016) upon which it is based, is the culmination of a number of years of work by IEMA in analysing the practice of Environmental Impact Assessment (EIA) and its effectiveness.

In the context of sustained investment in infrastructure and other development in the UK, and the imponderable that is 'Brexit', the Strategy notably describes the way that EIA has become disproportionate, and resultant Environmental Statements "cumbersome", over time. Tellingly, however, the Strategy identifies that it is not so much the EIA tool itself that is the causal factor but more the "cumulative consequence of the way it has been used".

By way of mitigation, the Strategy rightly points to professional, industry and central government initiatives and policy changes that have occurred recently within the UK since the 2014/52/EU EIA Directive, in a bid to streamline EIA. The fruits of these interventions have still to be seen and the Strategy sounds a note of caution in terms of the likely efficacy of such measures.

Fundamentally, the Strategy points at coordinated collaboration between all key stakeholders as being the central ingredient in effecting the sea change necessary to bring about proportional EIAs. Of greatest importance to achieving the goal, four key themes for action are identified within the Strategy:

1. **Enhancing People** – to increase the skills, knowledge and confidence of all relevant personnel and reduce reliance upon a precautionary approach;
2. **Improving Scoping** – to generate a consistently focussed approach from the earliest stages of a project;
3. **Sharing Responsibility** – recognising that collaborative actions will enable proportionate assessment and;
4. **Embracing Innovation & Digital** – recognising the role that this can play in modernising assessments and making them more efficient.

...what should the expectation be in terms of delivering proportionate EIA in the short to medium term...



The energy expended thus far in encouraging efficiency in EIA must be roundly applauded and should be greeted with much optimism. However, the Strategy itself reflects that changes will not happen quickly. Within that context, the question begs, “what should the expectation be in terms of delivering proportionate EIA in the short to medium term, and in light of the immediate requirements of the new 2017 EIA regulations (in all its derivations)?”

It should be clear from the outset that an underlying tenet of the 2017 EIA Regulations is to streamline assessments. Indeed, the emphasis it now places on scoping lies central to this desire and the attempt to subsequently establish a focussed EIA. However, there will remain various pressures and challenges that will need to be addressed and overcome, including:

- **Additional burden from the updated EIA process** – a potentially heavier scoping burden with additional or expanded assessment topics including climate change, human health, biodiversity and the effect of major accidents, are likely to ‘bulk up’ the process if not managed carefully.
- **The uncertainty of legal challenge** – challenges could be raised with respect to the ‘competency’ of experts and EIA practitioners, the scope agreed with the determining authority, new subject areas of assessment with no, or newly established, guidance/good practice, and the competency of the determining authority. Overall, history teaches us that a precautionary/defensive approach could result.

- **Developer/consultancy caution** – whilst certainly not true for all, historically, EIA’s have been overly precautionary, very often including assessments that could have been ‘scoped out’. The requirement to consider additional topics has the potential to compound that situation.

- **Wide spectrum of determining authorities** – with variable resources available, and often differing perceptions of what is an acceptable and competent assessment, achieving a consistent approach will be a substantial challenge.

- **Changing historical behaviours** – the reasons for EIA growing disproportionately over time is well publicised within the Strategy. In the short to medium term, this will likely remain the case.

These challenges are not exhaustive and represent potentially significant hurdles to achieving the goal of proportionate EIA. The degree to which these hurdles can be overcome will largely come down to the extent to which the collaborative essence of the IEMA Strategy, and its four themes for action, are adopted. Each key stakeholder will have their part to play, in particular:

- **Developers** – will need to provide the information needed to facilitate effective scoping (i.e. front loading), ensure transparent and proactive public dialogue and engagement, and engage early in the development process with determining authorities.

- **EIA Consultants/Practitioners** – in conjunction with IEMA will need to lead the way in establishing a common approach, show the willingness (along with the developer) to provide an informed and bold approach to scope out insignificant issues, and provide the necessary assurance of technical competency. Consultants will play a key role in facilitating appropriate collaboration between the project and determining authorities.

- **Determining authorities** – whilst consistency across all consenting bodies may not be a realistic goal, individually they must seek to be proportionate in their advice and requirements. Being receptive to early engagement by applicants will be important. Ultimately, instilling confidence in the planning system and managing the expectations of all stakeholders and working collaboratively with developers and consultants during scoping to refine the EIA, will be key.

- **Consultees** – will also need to be proportionate and (as with determining authorities) consistent with respect to requirements and/or expectations.


Longer term, the Strategy is a significant 'kickstart' and foundation upon which to progress towards effective and proportionate EIA's. The coming into force of the 2017 EIA regulations will likely contribute to this aspiration longer term but, in the short to medium term, has the potential to compound the inflated form which EIA has taken in the UK.

The opportunity is now here, however, for all stakeholders to play an important role both individually and in collaboration in moving towards a proportionate approach to the EIA process.

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Subsidy free energy and proportionate EIA: two forces pushing in the same direction?



The removal of subsidies for new onshore wind farms has presented developers with the twin challenges of seeking to maximise energy production whilst driving costs down. Despite a comparative hiatus in onshore wind development over the past couple of years, we are now seeing developers bringing projects forward to screening, scoping and environmental impact assessment. It is clear that viable unsubsidised projects do exist, but how do they stack up against the potential environmental impacts?

The need to maximise efficiency and reduce costs will apply to all stages of a project life cycle, not least to the development phase. Site selection and design will therefore have to focus more strongly on good wind resource as well as lowest construction and grid connection costs. The environmental impacts and associated planning risks will determine whether or not an application will be made.

Some cost reductions come from reduced manufacturing costs for turbines or construction techniques, but others will be sought in the development phase, particularly as it is at this stage that developer's expenditure is at risk. Wind Farm EIA's typically cover large areas, requiring extensive surveys and assessments, so are not cheap.

As part of the technical solution to project viability there is a move to larger turbines so their blades sit in higher wind-speeds and can provide greater energy capture. Prior to withdrawal of subsidies most proposals were for turbines in the order of 125m to tip, though some projects at 145m to tip were consented towards the end.

Now we are seeing proposals in scoping at 200m tip heights, bringing with it new challenges to landscape and visual assessments, not least with the added implication of aviation lighting for wind turbines over 150m to tip.

However, the move to larger turbines raises other design and environmental impacts than just visuals. Taller towers and longer blades have a greater swept area and may well require larger supplementary infrastructure such as crane pads and wider bend radii on site tracks.

It is not generally possible to hide a cluster of 200m tall turbines in a UK landscape, let alone build the required infrastructure without disturbing vegetation and surface water run-off and deliver the parts to site un-noticed.



At the same time we have a strong push for more "proportionate" EIA's, aimed at reducing and focusing effort, both for those undertaking EIA's as well as those whose role it is to consider them. Clearly we have likely tensions between developer pressure to reduce EIA cost and deliver a "proportionate EIA" versus planning authorities and consultees concerned about potentially greater impacts from larger turbines.

Tensions will also occur in planning decisions weighing both the increased benefits and environmental impacts from larger turbines. Whereas "green tariffs" were blamed for increasing energy bills, new-build wind is now the cheapest form of commercial large-scale energy in the UK. In times of austerity, will planning policy adapt to keep consumers electricity bills down?

Perhaps some of the tensions between cost and EIA effort can be resolved through more ruthless site selection and thorough scoping. Ultimately, it is not the cost of each individual EIA and planning application that a developer needs to measure, but rather the cost of the total effort for each megawatt of capacity consented. Clear and early identification of potential impacts, risks and opportunities on any site needs to inform developers on how to continue or whether to cut their losses. Ultimately a thorough but well focused, if perhaps more costly, EIA supporting a successful planning application is better than a whole handful of cheaper EIA's that don't result in a consent.

Another factor that is more relevant now is that developers are working on smaller margins and sites will be less likely to realise value at consent but be built out and sold as operational assets or even retained by the developer. This means that site optimisation at development stage and through construction is also key to viability. The "siloeing" of project life stages needs to be broken down and the best projects will have involvement from construction and site operation experts right from inception. Properly done this presents opportunities to minimise environmental impact as well as optimise investment returns. Pulling together and fully integrating such a team is another challenge for the developer.

It's early days for the revival of interest in new onshore wind projects in the UK but challenging renewable energy targets, cost pressures, new turbine technology coupled with changing EIA guidance and planning policies will make for interesting times.

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Construction Environmental Management Plans in Scoping Proportionate EIA

As identified by IEMA in 'Delivering Proportionate EIA'¹ and the Environmental Impact Assessment (EIA) industry within the United Kingdom ('UK'), disproportionately large Environmental Statements (ES's) are all too common with current scoping practices often leading to broad assessments that lack appropriate focus. This in turn leads to cumbersome ES's that burden all parties involved in the EIA process.

The aim of the EIA is to protect the environment by ensuring that the consenting authority, when deciding whether to grant planning permission, does so in the full knowledge of the likely significant effects, and takes this into account in the decision-making process. The ES, which reports the findings of an EIA process, should not contain every feasible environmental issue under the sun, as highlighted within paragraph 2 of the online Planning Practice Guidance² on EIA, where considering the scope of EIA's, local planning authorities "should limit the scope of the assessment to those aspects of the environment that are likely to be significantly affected".

The assessment of the effects within an ES Chapter is often divided into construction and operational assessment effects. It is required under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017³ (the 'EIA Regs') to define the methodology used to assess the construction and operational effects, and report on the assessment of the construction and operational effects (these sections include mitigation measures).

As a result, these sections can account for the majority of text found within the technical ES Chapters, with construction methodology and assessment of effects accounting for over half of the word count. If one was to successfully scope out construction effects within individual environmental topics from assessment, the length of the ES would reduce dramatically and contribute to proportionality within the assessment.

The changes contained within the EIA Regs have now put greater emphasis on mitigation measures during the screening stage, as outlined within Schedule 3, paragraph 3(h) to screen out development from EIA. As a result, it is now common for screening opinion requests to the consenting body to screen out adverse construction effects on the basis of implementing a Construction Environmental Management Plans (CEMP) and Construction Logistics Plans/Construction Traffic Management Plans. In contrast, no supportive text has been included within Part 4, Preparation of Environmental Statements, paragraph 15 of the EIA Regs to include the same emphasis on mitigation measures during the preparation of EIA scoping reports to help scope out significant effects and deliver proportionate EIA's.

CEMP's have long been used to provide a documented commitment by developers, contractors and EIA practitioners globally in the management and mitigation of the temporary effects that are associated with the construction of developments. This is in part due to the CEMP being 'tertiary' mitigation.

IEMA guidance in 'Delivering Quality Development'⁴ defines tertiary mitigation as that which will be required regardless of any EIA assessment, as it is imposed, for example, as a result of legislative requirements and/or standard sectoral practices. A great example is the UK considerate contractors' practices that manage activities which have the potential to cause nuisance effects associated with construction sites.

Given the drive for proportionate EIA within the industry and that CEMP's are a tried and tested standard mitigation measure to address temporary effects associated with construction, the question arises, should EIA Development not be required to deliver a CEMP as part of the ES submitted in support of the planning application as a standard requirement. If this were the case, the CEMP would form part of the project description during the scoping stage and taken as read in assessing the potential likely significant effects of the development.

On that basis, this form of mitigation would be delivered, thus, any construction effects that might have arisen without this form of mitigation would not need to be assessed within the EIA and presented in the ES as there should be no potential for them to arise. In addition, the delivery of a CEMP at the planning application stage would also provide the local planning authority, statutory and non-statutory stakeholders the opportunity to comment on and provide input into the CEMP prior to determination of the application and the CEMP being secured for implementation and monitoring by condition.

...CEMP's can be a key component in delivering proportionate EIA's by informing the scoping process and providing tried and trusted mitigation measures...

In summary, CEMP's can be a key component in delivering proportionate EIA's by informing the scoping process and providing tried and trusted mitigation measures that have been implemented on construction sites across the UK for decades.

References

1. IEMA, 2017. Delivering Proportionate EIA: A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice, July 2017. IEMA
2. Department for Communities and Local Government (live document). Planning Practice Guidance.
3. Her Majesty's Stationary Office (HMSO), 2017. Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Stationary Office.
4. IEMA, 2016. Environmental Impact Assessment Guide to: Delivering Quality Development, July 2016. IEMA



Proportionality Prevents Poor Performance

It is no secret that a fundamental aim of EIA is to deliver proportionate and fit-for-purpose Environmental Statements (ES's). Whilst EIA Practitioners all know the theory of proportionality – there is certainly a plethora of IEMA and other guidance on the subject – delivering it in practice can be challenging, as has been demonstrated in a recent EIA managed by Lichfields.

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Central Quay Phase 1 is the first phase of the redevelopment of a landmark brownfield site within central Cardiff that is currently occupied by the Brains Brewery. With Brains set to move to new premises over the coming years our client is proposing a long term, phased, redevelopment of the site.

The first phase is for a mixed-use office development, a car park and public realm works. Once complete, Central Quay will deliver around 1 million sq ft of office, residential, education, hotel and ancillary development (food/drink units, retail etc) set within a series of public squares. Phase 1 is for around 20% of the total development.

In itself the requirement to undertake EIA for Phase 1 was borderline. However, as Phase 1 is part of a much larger development it was agreed that there was a need to consider the potential for significant environmental impacts of the development as a whole.

Pre-application consultation with the Council raised the question of how the development as a whole could be tested within the EIA.

One option was to apply for the wider development in outline and test a series of parameters however, the level of uncertainty regarding the wider development at the time of submission would not provide sufficient flexibility for our client. Best guess parameters could have been established but this would have been in the knowledge that multiple amendments and addenda would be required as details are fixed.

Instead a masterplanning approach was agreed with the Council, with the Central Quay Masterplan tested as a cumulative development even though it does not meet the official 'existing and/or approved projects' definition of cumulative development within Schedule 4 of the 2017 EIA Regulations. Whilst there remain unknowns, the general quantum, scale and nature of future development phases has been established. Any subsequent changes will then be assessed on their own merits within future planning applications (and EIA, if required).



A further issue was a subsequent request from the Council (following inputs from statutory consultees into the EIA scoping process) that the cumulative assessment tests levels of car parking some 16% and 32% over the maximum number proposed within the Central Quay Masterplan. The justification was to allow for future flexibility as the consultee seeks additional car parking. In order to clearly differentiate between the main cumulative assessment and this additional assessment, a further 'alternative cumulative assessment' was included within the standalone ES chapter.

The Council also required that the EIA consider Population and Human Health impacts as a standalone assessment. Whilst health impacts have been a general consideration within EIA for some time, the specific requirement for the risks to population and human health to be assessed only became mandatory following the publication of the 2017 EIA Regulations.

In our view, the potential population and human health impacts were not significant to warrant EIA, though as a 'new' topic and due to the level of public interest in the redevelopment of the iconic Brains Brewery site the Council took a precautionary approach. Challenging the scoping opinion was not feasible due to time constraints.

Adopting a proportionate approach to the environmental assessment has been useful in scoping the population and human health assessment as it has allowed the report to focus on a few key issues. That the most important issues were air quality and noise did lead to some repetition as these were already covered elsewhere in standalone ES chapters. The above experiences indicate that there remains a lack of understanding about the role of EIA and scoping. It is the role of competent expert practitioners to challenge local authorities however in order to do so it is important to a) allow sufficient time to challenge decisions if necessary; and b) provide sufficient evidence to justify the proposed scope of EIA's, even though this can require additional initial expenditure by the client.

Ultimately a consequence of the above actions has produced an ES that is longer than perhaps it should be and includes a topic that could have been scoped out. The requirement for proportionality has allowed the assessments to be tailored appropriately, with a key focus being on the cumulative assessment given that the Phase 1 development itself does not, arguably, warrant EIA.

Further Information:

IEMA, Ben Cave Associates & Faculty of Public Health, 2017. 'Health in Environmental Impact Assessment: A Primer for a Proportionate Approach', May 2017.

...there remains a lack of understanding about the role of EIA and scoping...



Reducing the length of environmental statements: a new approach

One of the hot topics in the field of EIA in recent years has been about how we reduce the length of environmental statements to make them better focussed and more easily accessible to decision makers and other stakeholders.

The focus of the team at CBRE has always been to 'scope out' and 'scope down' topics where it is reasonable to do so. This naturally results in shorter, more proportionate environmental statements than are achieved by adopting a 'one size fits all' approach, whereby the same, say, fifteen chapters are prepared irrespective of the nature, size or location of the scheme being assessed. Despite this, we still ended up with main volumes that were anywhere between 180 and 340 pages in length, and a feeling that there must be a better way of doing things.

The most obvious route to reducing the length of the technical chapters was the use of summary tables to provide key information on:

- the methodology employed, including the baseline surveys and assessments undertaken and how sensitivity, magnitude and significance were attributed;
- the key receptors and the sensitivity attributed to each;
- the potential significant adverse and beneficial environmental effects during the construction and post-construction phases of the development;

- the way that the design has responded to environmental constraints (design interventions);
- the assessment of pre-mitigation effects, taking into account the design interventions;
- the proposed mitigation and enhancement measures that are not embedded in the design, and how they are to be secured; and
- the assessment of residual effects, once mitigation has been taken into account.

Once the team had come up with a series of tables that we felt logically set out the key information, we started to retrospectively apply the methodology to a previous ES to see whether it worked in the way we intended it to. Following a few tweaks and improvements – the most important being to ensure that sufficient information was included in the tables to remove the need to cross-reference too frequently to the technical appendices – we were left with a series of technical chapters that were approximately 75% shorter than their previous incarnation.

Aware of the fact that a new approach has the potential to generate greater scrutiny on the basis that it is different, we sought feedback from a panel member of IEMA's EIA Quality Mark scheme as well an environmental lawyer with whom we'd worked in the past.

This was to ascertain whether the approach would meet the Quality Mark criteria when we were next assessed for our ongoing registration and whether it gave sufficient comfort that it could be defended in court, if such a situation were ever to arise.

The response we received was encouraging:

“The proposed revisions improve on the presentation of the ES and ensure that the decision maker and other stakeholders are able to rapidly identify and understand the assessment process undertaken and the determinations of significance.”

“The use of appendices to collate surveys and assessments undertaken ensures that data is still available within the ES and accessible if further scrutiny is required.”

“This new structure is to be encouraged as one way to encourage proportionate ES better able to communicate the significant environmental effects of proposals to decision makers and stakeholders.”

The approach to the technical chapters and the work we have done to independently corroborate its robustness will be included in our future requests for scoping opinions, as well as in the EIA methodology chapter of our future environmental statements. This will hopefully act to give comfort to local authorities and other consultees that, whilst different to the structure they might be used to, the approach meets all of the regulatory requirements. It is perhaps this fear of the regulatory requirements that has stifled innovation in the way that environmental statements are presented.

We believe that our new approach will be of benefit to the reader, the technical consultants working on the project, and ourselves, as EIA coordinators. The technical consultants have tables that clearly present the information that they are required to include in their assessments, which differs from the way it might be presented in reports for non-EIA developments, and will likely cut down the number of comments received on draft chapters.

The coordinator will benefit during the review period, as the format of the tables and the cross-referencing to appendices throughout acts as a useful prompt, whilst the final ES will present all assessments consistently and coherently in a way that minimises the amount of editing. The reader, meanwhile, will be more easily able to ascertain the likely effects of the development both pre- and post-mitigation, with the three volumes of the ES aimed at three distinct audiences: the non-technical summary at the layperson, the main volume at the case officer and those with some environmental knowledge, and the technical appendices at the environmental specialists.

There are undoubtedly other methods that could be employed to reduce the length of environmental statements, but we hope that the approach we have devised will play a part in changing EIA practice for the better.



Vibrant and readable Environmental Statements Part 1: Is achieving a readable ES worth the extra effort?

Who is passionate about EIA?

From foodies to footie fans the adjective ‘passionate’ is simultaneously trendy and toe-curling. By contrast, ES’s 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.

...does that matter if the ES main document is agile, and clear logic supports the story of the impact of the proposed development...

So why are some ES’s so formulaic?

Some ES’s that we get to review might be technically correct, but they are so boring, disjointed (often due to injudicious cut-and-paste from the ES’s 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 ES’s 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 projects 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 CIEEM'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 ES's 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, and 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
- protect and improve the environment.

Further Information on the Environment Plan:

www.gov.uk/government/publications/25-year-environment-plan

Note: Part 2 of this article is available online alongside hundreds of other short thought pieces and case studies on effective approaches to different aspects of impact assessment; all produced by registrants to IEMA's EIA Quality Mark scheme. See:

Vibrant and readable Environmental Statements Part 2: What does a readable ES achieve?

Download it here: <https://www.iema.net/assets/uploads/EIA%20Articles/NEAS%20Vibrant%20and%20readable%20Environmental%20Statements%20Part%202.pdf>

Do you make effective use of ALL of IEMA's IA member resources?

IEMA's website contains a treasure trove of IA related content, as well as information about IEMA's volunteer network groups, from regional groups, through UK impact assessment to ESIA across international finance. But not everyone makes the most of this free member content, including:

- Future events and webinars.
- Recordings of past webinars, with over 24 hours' worth of IA content.
- IA Guidance & advice: From Effective NTS, through climate (GHG and Adaptation), health, influencing design and delivery, to forthcoming documents on material assets and major accidents & disasters.
- The Proportionate EIA Strategy, and its related CPD Masterclass courses.
- Over 400 EIA articles and 200 case studies related to EIA, developed by Q Mark registrants in recent years.
- Individual and Organisational recognition specific to EIA, through the EIA Register and EIA Quality Mark schemes respectively.

Contact details to engage with the steering group members for the:

- IA Network
- GESA Group (Global Environmental & Social Assessment)
- Geographic/Regional Groups

We are currently working to enhance the website's accessibility, but it is all there waiting for you; just use the search box!

www.iema.net



Summary

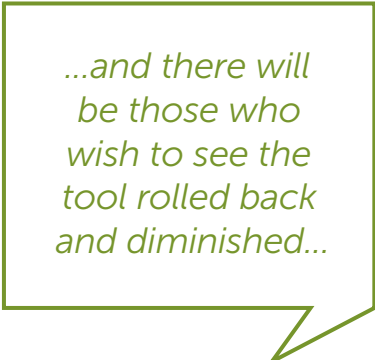
Josh Fothergill - Guest Editor

What is striking across the six articles here is that proportionate EIA is a broad agenda, with no quick fix. More engaging outputs can be achieved by better Environmental Statements (ES) writing, but just as critical is managing the assessment inputs & influence and ensuring effective outcomes are delivered for the environment, developer and communities.

UK EIA practice has enjoyed over 30 years of direction, and protection, from the over-arching EIA Directive. However, that protection will soon come to an end as a result of Brexit. Assuming we do leave the European Union, then UK EIA will be open to the potential for far more substantive changes than are ever likely to be agreed across 28 Member States. Undoubtedly this poses risks to EIA's future, and there will be those who wish to see the tool rolled back and diminished; however, the change could also provide a window of opportunity to improve the effectiveness and influence of EIA.

In my view, the work we do as the UK's EIA community in the next year or so - to demonstrate progress in delivering more proportionate assessments and engaging ES - will play a key role in whether any future Government review of the tool is undertaken in an open and positively minded manner, or focussed on a reductionist rollback. Delivering proportionate EIA may prove to be the defining challenge in ensuring the tool has a positive and growing role in UK consenting.

I hope you enjoyed the inaugural edition of the IA Outlook Journal. If you are interested in contributing to a future edition, please see the information and advice overleaf.



...and there will be those who wish to see the tool rolled back and diminished...



The IA Outlook Journal will return in 2019, featuring:

- Three to six issues of the Journal;
- Articles from Q Mark registrants, members and guests – see details below;
- Topic, process and sector related themes and articles; and
- New Guest Editors – see below for details

Interested in Contributing?

A key role of the IA Outlook Journal is to enhance the readership and thus impact of articles produced by registrants to the EIA Quality Mark scheme. However, the IA Network Steering Group is keen to see the Journal also provide opportunities for all members who have a useful perspective to share in relation to IA.

As such, once the relaunched Journal has bedded a little in 2019, the intention is to begin highlighting future themes for the Journal on these pages and on IEMA's website, with a date by which any member can contribute an article. All articles submitted will be reviewed for quality, by a small panel from the Steering Group, and all accepted articles will be passed to the relevant issue's Guest Editor for consideration. Any articles that don't make the Guest Editor's selection for inclusion in the relevant Journal issue will be made available as additional resources online.

Articles in IA Outlook must be approximately 800 words in length and provide a perspective on the theme of the issue they are seeking to be included within. Articles will generally be written by a single author and must avoid being directly advertorial of the services provided by the author's organisation.

The Role of the Guest Editor

The initial IA Outlook Guest Editors will be selected from the IA Network Steering Group; however, as the publication becomes more established, we would like to expand this to enable others the opportunity to take the helm.

To help members get a feel for what is involved in the Guest Editor role, they are responsible for:

- Helping define the core theme that runs through that issue of IA Outlook;
- Selecting five or six perspectives articles/ case studies to be included;
- Producing a short Guest Editorial at the front end of their issue, which introduces that edition's theme and presents a narrative across the selected articles and their subject matter, and;
- Provide a summary to draw the issue to a close and provide any concluding remarks on the theme.

If you feel you would make a good Guest Editor - on a specific theme – please contact IEMA's Policy Lead, Spencer Clubb (E: s.clubb@iema.net), who provides headquarters support to co-ordinate the IA Network's activities.

Acknowledgements

IEMA's Impact Assessment Network (IA Network)

Steering Group is a group of 15 members that volunteer their time to provide direction to the institute's activities in the field. The Steering Group members play a vital role in ensuring good practice case studies, webinars and guidance are developed and shared across the UK EIA community.

Josh Fothergill, IEMA's former IA Policy Lead (2008-2017) and 2018 elected member of the IA Network Steering Group, has acted as the guest editor for this inaugural edition of the new IA Outlook Journal, setting out the initial structure, future author advice and layout for the forthcoming editions. We recognise and appreciate these essential efforts. We also offer thanks to the editors and reviewers of this edition: **Spencer Clubb** and **Charlotte Lodge** (IEMA), plus from the IA Network Steering Group: Rufus Howard (Royal Haskoning), Andy Ricketts (Turley), Noemi Arena (Costain), David Hoare (WSP), Peter George (Capita) and Adam Boyden (Jacobs).

In producing this issue of the IA Outlook Journal, we would like to thank the authors of the articles in this first edition of Impact Assessment Outlook: **Mike Kelly, John Woodruff, Calum Cockerill, Elizabeth Evans, Tom Wells and Deborah Dunsford**. Alongside the authors we would also like to thank the EIA Quality Mark registrant organisations, who both gave the authors time and encouragement to write the articles, and allowed their publication in this IEMA IA Network publication, they are: **RSK, Natural Power, Quod, Lichfields, CBRE** and **NEAS** (the National Environmental Assessment Service, Environment Agency).

IEMA's EIA Quality Mark - a scheme operated by the Institute allowing organisations (both developers and consultancies) that lead the co-ordination of statutory EIAs in the UK to make a commitment to excellence in their EIA activities and have this commitment independently reviewed. The EIA Quality Mark is a voluntary scheme, with organisations free to choose whether they are ready to operate to its seven EIA Commitments: EIA Management; EIA Team Capabilities; EIA Regulatory Compliance; EIA Context & Influence; EIA Content; EIA Presentation; and Improving EIA practice.

Perspectives on Proportionate Environmental Impact Assessment (EIA)

Thought pieces from UK practice

This first edition of the re-launched Impact Assessment Outlook Journal provides a series of thought pieces on how to ensure the EIA process and resulting Environmental Statement can be made more focussed, effective and efficient. In this edition, the Guest Editor (Josh Fothergill) has selected six articles produced by EIA professionals from respected organisation's registered to IEMA's EIA Quality Mark scheme. The result is a thought-provoking quick read across different aspects of UK practice exploring different ways to delivering proportionate EIA.

About the Guest Editor: Josh Fothergill FIEMA CEnv

IEMA IA Network Steering Group member and Director of Fothergill Training & Consulting Ltd.

Josh is an internationally respected impact assessment expert with a focus on institutional capacity building and developing skills and capabilities of practitioners. Josh spent the best part of a decade at IEMA, as Policy Lead for Impact Assessment, during which he created the EIA Quality Mark and wrote both the State of EIA Practice in the UK report (2011) and the UK's Proportionate EIA Strategy (2017), alongside co-authoring over ten core EIA topic/practice guides. Josh is now an independent trainer and consultant in impact assessment, organisational sustainability skills & strategy and the Circular Economy. He works with the likes of the World Bank, Public Health England, BSI, Research Institutes of Sweden, and volunteers time to IEMA to continue helping develop the profession.

About IEMA

We are the worldwide alliance of environment and sustainability professionals. We believe there's a practical way to a bright future for everyone, and that our profession has a critical role to play.

Ours is an independent network of more than 14,000 people in over 100 countries, working together to make our businesses and organisations future-proof.

Belonging gives us each the knowledge, connections, recognition, support and opportunities we need to lead collective change, with IEMA's global sustainability standards as our benchmark.

By mobilising our expertise we will continue to challenge norms, influence governments, drive new kinds of enterprise, inspire communities and show how to achieve measurable change on a global scale. This is how we will realise our bold vision: transforming the world to sustainability.

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