

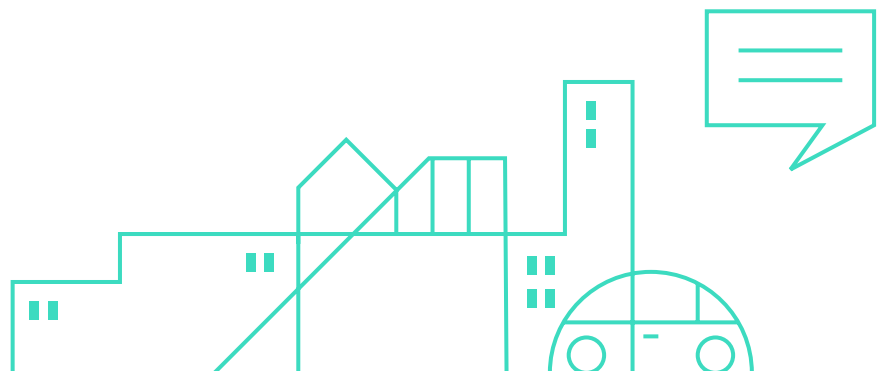
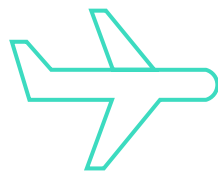


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Delivering Proportionality in Impact Assessment

Thought pieces from UK and International practice



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Proportionate assessment. It seems this phrase has been echoing around discussions on Environmental Assessment forums for at least the last 20 years. And yet Environmental Assessment practice remains too often steeped in detail, with reports that are unwieldy and impenetrable. Why does this matter and, if it does, what do we need to do to overcome it?

Proportionate assessment addresses both process and product, and for each is about doing only as much as required by regulation and national policy to deliver sustainable development. The collection of articles in this journal looks at several aspects of the issue: the causes, challenges and possible solutions. It provides perspectives from various custodians in the EIA process, outlines opportunities for Environmental Assessment practices to support proportionate assessment, considers how change might be implemented, and gives a forward look to how a future assessment regime (in the form of Environmental Outcomes Reports – EORs) might help us get there.

An exponential growth

It is unarguable that Environmental Assessment has grown exponentially since the early days of Environmental Impact Assessment (EIA). Where the Environmental Statement (ES) for High Speed 1 (the then Channel Tunnel Rail Link) in the 1990s was 900 pages, the ES for HS2 was 50,000 pages just for Phase 1, even before the additional provisions added to the paperwork. Having been involved in both projects, I can testify to the greater depth of understanding in environmental impact for the more recent of the two. The environmental mitigation that is embedded in HS2 is extensive and

impressive. But HS1 was no slouch in this regard, and its EIA was, despite its relative simplicity, highly effective in delivering a range of noise mitigation, tunnels to lessen landscape impacts, green bridges and widespread habitat creation.

Pointing at the problem

The additional depth of analysis and quantum of words that we see in contemporary Environmental Assessment reflects some impressive investment. But there's a problem – who really understands it? We would expect comprehension from technical specialists on both sides of the table, but the majority of people potentially affected by or interested in the outcome – most importantly, the general public – are left scratching their heads. If we give the impression that this stuff is all too complicated for general understanding, we engender mistrust and reinforce opposition. As Angus Walker writes later, the more words we offer up, the greater the risk of inconsistencies that lie at the heart of many a legal challenge.

In addition, with complex process, excessive detail and enormous reports, comes a corresponding scale in cost. And while environment has unjustly borne the brunt of recent criticism for planning delay, big assessment

can, with other planning processes, lengthen time to consent.

A call for proportionate assessment echoes ever more loudly across the environmental planning industry. Research behind the Office for Environmental Protection's 2023 review of EIA practice¹ recorded a general plea for more proportionate assessment: 'EIA has become a behemoth, whose size and complexity in both process and product have yielded many drawbacks without a balance of advantage.'² Government is no less keen to see change.

Change is coming

Accusations by both this Government and its predecessor are that over-complicated EIA is a deterrent to swift planning decisions. The 2020 Planning White Paper, *Planning for the Future*, was replete with criticism, referring to the 'shackles of burdensome assessment', while the new Government has recently referred to '... voluminous and costly documents that too often support legal challenges rather than the environment.'³ While we might rebut the link to EIA and planning delay, the writing is clearly on the wall. Might the mooted EOR regime be what is needed to instil proportionality to the process?

A new approach

The thing is, we know how to do better. In particular, we know that bold and decisive scoping is critical to focus assessment on the things that matter and excise those that don't. But consultees need the skills and resource, backed by robust evidence, to support this approach. Rob Brydges and Clare Siemers make this point clearly in their articles.

Elsewhere, Ursula Stevenson discusses the ways that the two stages of assessment (SEA and EIA) should work better together to avoid duplication, while Ellen Smith outlines how better reporting skills and techniques can help deliver more succinct reports. I can endorse this point: by appointing a skilled product team to the recent Cambourne to Cambridge ES,⁴ rather than amalgamating the work of multiple authors, we have conveyed all necessary EIA information for this major infrastructure project in less than 150 pages, keeping the more technical detail within topic reports.

Other good practice is emerging. Jo Wootton and Peter Bruce offer a case study that demonstrates a way forward, while Catherine Anderson shows how EIA for major infrastructure projects can exemplify efficiencies. At WSP, we are implementing several measures to expedite proportionate assessment, including omission of planning policy, excising climate resilience as an ES topic (while retaining its wider application in supporting design and other assessments), and embedding mitigation through collaborative design and within assessment assumptions.

Securing a change

What is clear is that proportionate assessment requires collaboration at all levels in EIA. Perhaps we can look to the Government to help us all play nicely, through both regulation and statutory guidance. But equally, the Government really needs to build on our industry experiences if they want to deliver the proportionate outcomes we mutually seek.

¹ OEP (2023), A Review of the implementation of environmental assessment regimes in England. www.theoep.org.uk/sites/default/files/reports-files/E02979435_OEP%20Environmental%20Assessment%20Report_Accessible.pdf.

² WSP (2024) Analysis of the environmental assessment regimes: England and Northern Ireland. OEP. www.theoep.org.uk/sites/default/files/reports-files/WSP.pdf.

³ HM Treasury, The Rt Hon Angela Rayner MP & The Rt Hon Rachel Reeves MP (2025). 'Government goes further and faster on planning reform in bid for growth.' www.gov.uk/government/news/government-goes-further-and-faster-on-planning-reform-in-bid-for-growth.

⁴ www.greatercambridge.org.uk/sustainable-transport-programme/public-transport-schemes/cambourne-to-cambridge/cambourne-to-cambridge-latest.

Proportionality in Strategic Assessment: Can SEA and EIA work better together?

The IEMA Strategic Assessment Working Group has been reviewing some of the challenges and opportunities for improving future practice. Many of the solutions for more proportionate Strategic Environmental Assessment (SEA) match those for EIA: more effective screening and scoping, improved presentation and reporting, and bolstering skills and expertise across the industry. However, in our excitement to crack-on with assessments, we can neglect to think about the roles of SEA and EIA at each stage of development planning and where better linkages and synergies between them would help deliver proportionality. This thinking can be helped by referring to the assessment hierarchy; an overview of which is provided in Figure 1.

There is strong case for the different levels of assessment to work better together so that assessment and reporting are undertaken at the right level.

Establishing a clear hierarchy of policy-, plan – and project-level assessment can enable more focused scoping, assessment, mitigation and monitoring.

In the UK, strategic assessment can include sustainability appraisal and integrated assessment, as well as SEA. Strategic assessment applies to plans, policies, strategies or programmes (although for brevity I will refer to 'plan-level' assessment). EIA is applied at the project level but, ultimately, both forms of assessment are tools to improve sustainability.

When starting any assessment, a bit of time establishing the plan or project's relationship to the hierarchy can save a lot of abortive effort elsewhere in the process. It also helps focus consultation with stakeholders on what can be addressed at the relevant level. I would advise practitioners to check on results of any earlier

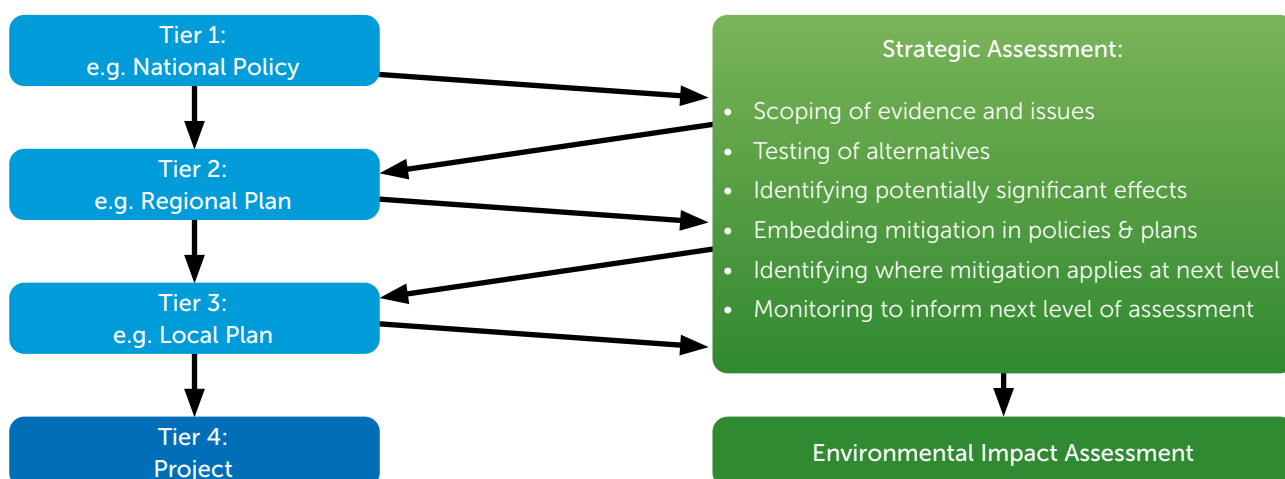


Figure 1: A summary of the Environment Assessment Hierarchy.

assessments further up the hierarchy and build on these, rather than repeating the process. Consider also what would be expected at subsequent tiers so that the results of the assessment, including potential impacts, mitigation and monitoring, can be readily used at the next level.

Establishing a clear hierarchy of policy-, plan- and project-level assessment can enable more focused scoping, assessment, mitigation and monitoring.

Asking three key questions can help focus your work and keep the assessment proportional by addressing the right level of information at the right time:

1. What assessment detail is appropriate to the level in the hierarchy?

Some plans deal with strategic policy covering larger areas, while others propose infrastructure at specific locations. Some plans do both, although design information is often not available or very limited.

Set the scope of the assessment to reflect the impacts that are specific to the plan, including baseline data collection. Limit the geographic focus to areas likely to be affected. Defer to later project-level assessment for more site-specific information. A focus on international or national environmental designations is common at higher tiers. Existing information such as natural capital mapping or biodiversity opportunity areas may be useful for a middle-tier assessment. While SEA can acknowledge that local receptors such as protected species are likely to be present, their assessment should be deferred to project level, particularly where there isn't sufficient information to determine impacts.

2. What alternatives apply to this level in the hierarchy?

Usually the 'need' for a plan or project has been established at a higher tier, such as national policy. Similarly, the ways to meet the need may already be established by a policy or programme, e.g., a type of low-carbon technology to contribute to net zero. Alternatives like location or phasing of development are established at lower tiers – local plans or projects. Signposting these avoids repetition, helps close out areas of potential challenge, and means the focus is on assessing viable alternatives with the aim of improving the sustainability of the plan.

3. How does mitigation and monitoring apply?

Look to earlier assessments for any existing recommendations for mitigation (or enhancement) that need to be applied at the current level. Check whether there is any information from monitoring at a higher tier that can be used to inform the current assessment.

Equally, identify where project-level mitigation is more appropriate to address potential effects, keeping the focus on what can be achieved at the current tier. For example, at a strategic level, you might recommend:

- rewording policies to improve sustainability, such as embedding targets for net zero or nature recovery;
- identifying where monitoring or further analysis would be beneficial to address uncertainties prior to project-level assessment, for example, generating climate change scenarios or water quality monitoring to establish existing sources of pollution;
- identifying where landscape-scale mitigation or enhancement is needed and fostering a collaborative strategic approach to deliver this across multiple projects.

Proportionality in Environmental Assessment has its challenges and tackling these issues is always easier said than done. However, if we want assessment to be more focused, we need a common understanding of what can be delivered in terms of sustainable development at each tier and enable SEA and EIA to help each other out.

The proportionate scope

Introduction

Achieving a proportionate scope for an EIA and ES requires buy-in from the statutory consultees, which, in turn, hinges on a well-informed, robust and justifiable approach to scoping. Fundamental to this is a thorough knowledge of baseline environment, an appreciation of stakeholder concerns and meaningful communication throughout the process. In her article later, Clare Siemers (London Borough of Tower Hamlets) emphasises the need to keep talking throughout scoping and into assessment, and here I have set out other ways of making the scoping stage as effective as possible.

Good timing; good information

The timing and duration of the scoping process is key. It's important to have enough information about the design of the development to inform meaningful discussion on the scope of assessment, whilst allowing enough time in the overall project programme to incorporate any design and/or assessment changes. If scoping is completed on the basis of only superficial design details, consultants are likely to be met with muted feedback from consultees.

Garnering trust

When preparing the Scoping Report, it is vital to ensure that a competent technical team conducts sufficiently detailed baseline research. This supports robust decisions and demonstrates a clear understanding of the opportunities and sensitivities relevant to the proposed development. Presenting these findings in a clear, concise manner builds trust with consultees, showing that the scope of the EIA/ES has been determined through careful and competent consideration. In addition to this, presenting a proven and technically robust methodology for assessing the impacts demonstrates technical competency and aids

in building trust. Angus Walker's suggestion later on for a government diktat on required assessment methods would be helpful in securing an agreed approach.

Using the collaborative process to work mitigation into the development at an early stage, and communicating these measures with consultees, can obviate any more detailed assessment

Scoping out – making the case

When it comes to justifying the scoping out of certain elements from assessment (be these whole topics or merely aspects of topics), it is important to present a clear and robust case for why effects would be unlikely and/or not significant. Demonstrably close collaboration between the environmental and design teams is key to designing out potentially significant effects and realising positive environmental outcomes. Using the collaborative process to work mitigation into the development at an early stage, and communicating these measures with consultees, can obviate any more detailed assessment. From the perspective of a stakeholder with strong views, seeing that their concerns are acknowledged, listened to and addressed can soften any opposition rooted in the perception that their concerns have been overlooked.

Talk it through

Meaningful consultation should begin as early as possible and be well-informed by thorough baseline assessment to maximise effectiveness in achieving

buy-in for the proposed scope. It is important to have competent environmental specialists that can demonstrate their experience and knowledge of the local context to inform communications with consultees. This consultation process should be synergistic with the EIA process itself: concerns raised during consultation need to be clearly addressed in the Scoping Report and later EIA Reports, demonstrating to the consenting authority and statutory consultees that these issues have been considered from the outset and that any necessary design and mitigation measures have been incorporated in response. This approach also paves the way for agreement on a proportionate scope.

Managing the relationship with the consenting authority is particularly important. Depending on the application type and consenting regime, direct access and face-to-face meetings with the authority may be difficult, but they pay great dividends. Where possible, scheduling an early meeting can be highly effective for addressing preconceptions and building rapport. Continued dialogue is then important to convey a strong understanding of baseline conditions and environmental sensitivities. Allowing for clear input from consultees helps get buy-in, though equally should deter demands for a kitchen sink approach to EIA, which can arise from inexperienced or unconfident consultees.

Good engagement also allows consultants an opportunity to justify a more ambitious approach to scoping that supports proportionate assessment. Gauging the authority's reaction to any measures proposed to justify scoping out certain elements (e.g., through design commitments and/or planning conditions) can indicate whether a refinement to the approach is needed, and whether a little more information is required. This can be viewed as pre-assessment – beyond scoping, but before a full-scale assessment.

Final thoughts

It is common for consultees to raise concerns about the environmental and social impacts of a proposed development, which can impede buy-in on a proportionate scope. Early, effective consultation is a powerful way of appeasing the consultees' pre-conceived concerns and reducing the likelihood of these concerns being formalised in their consultation response to the Scoping Report.

A well-managed relationship with the consenting authority can demonstrate awareness and appreciation of their concerns. This may prove influential when the authority considers the consultee comments when preparing its formal Scoping Opinion.

And remember, it is the consultees that have to be confident in the assessment approach, as it is they who will need to justify the approach to politicians and the public.

If these processes – early consultation, positive stakeholder relationships and a robust Scoping Report – are carried out effectively, the chances of securing acceptance of the scope within the Scoping Opinion are greatly improved. A thorough Scoping Report, complete with clear mitigation commitments, also provides strong and justifiable grounds to push back against any disproportionate elements that may be present within the Scoping Opinion.



Proportionate Environmental Impact Assessment: A lawyer's perspective

Context

Although legal compliance is oft cited as the felon when it comes to the growth of Environmental Statements, the EIA Regulations make no such demands; indeed, the inclusion of belt and braces information can bring its own risks. Perhaps the promised change to Environmental Outcomes Reports offers a solution?

EIA was introduced into UK legislation in 1988 as a result of EU directive 85/337/EC.⁵ Despite now having left the EU, the UK remains a signatory to the Rio Declaration⁶ and associated Convention on Biological Diversity,⁷ and the Aarhus⁸ and Espoo⁹ conventions, which require Environmental Assessment in general, public participation in environmental decision-making and reporting on transboundary environmental effects respectively. There is therefore a minimum level below which EIA cannot be reduced without the UK being in breach of its continuing international obligations.

Since its introduction, the law on EIA has not changed significantly. It was overhauled via a further directive (2011/92/EU¹⁰), implemented in the UK in 2017, but this did not change the process and added a few further matters to consider within assessment such as climate change and major accidents and disasters.

Nevertheless, Environmental Statements have been getting longer and longer over time. This is not in

response to increased legal requirements, although it may be the fear of legal challenge that has resulted in the inclusion of more rather than less material. This may often be counterproductive.

Size does not guarantee immunity from challenge

Where more material is included in Environmental Statements (ESs) out of caution, this does not necessarily have the effect of reducing the likelihood of legal challenge. More text increases the risk of inconsistencies, especially if amendments are made at the last minute before an application is submitted or during the pressure of a DCO examination or planning inquiry.

Legal challenges often concern themselves with not just inconsistencies, but particular words used in ESs, and the larger they are, the more scope there is for infelicitous wording to occur and remain undetected by the developer.

The essentials – what must be in an ES according to current law

Before considering how to reduce the size of ESs, here is what one must contain as set out in Regulation 18 and Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (there are equivalent regulations for other consenting regimes). The requirements can be paraphrased as:

⁵ eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A31985L0337.

⁶ www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A_CONF.151_26_Vol.I_Declaration.pdf.

⁷ www.cbd.int/convention/articles/default.shtml?a=cbd-14.

⁸ unece.org/DAM/env/pp/documents/cep43e.pdf.

⁹ unece.org/fileadmin/DAM/env/eia/documents/legaltexts/Espoo_Convention_authentic_ENG.pdf.

¹⁰ eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32011L0092.

1. Description of the development
2. Description of the current baseline and the likely evolution thereof without the development
3. Description of the development's likely significant effects on the environment, particularly population and human health, biodiversity, land, soil, water, air, climate, material assets, cultural heritage, landscape and the interaction between these, including cumulative, indirect, secondary, transboundary effects
4. Description of its features or proposed mitigation intended to reduce or eliminate such effects
5. Description of the main alternatives considered and reasons for adopting the one chosen
6. Description of the methods or evidence used to identify and assess effects
7. Non-technical summary

Although methods are mentioned, this does not oblige copious text on methodology in Environmental Statements; nor is there any requirement for coverage of national and local policy, and yet how much do we see written on this?

So, nothing in the regulations has driven burgeoning EIA process and product, but might new regulations help bring things back in line?

Environmental Outcomes Reports – all change?

The current regime of Environmental Impact Assessment is due for a fundamental overhaul, via changes enacted but not yet brought into force in the Environment Act 2021. The idea is that Environmental Statements will be replaced by Environmental Outcomes Reports, which report the effect of the proposed development (or plan) on a series of published environmental outcomes rather than effects on the environment in general. For example, will the development slow down the achievement of national air quality targets?

The motivation for this appears to be to create a homegrown Environmental Assessment regime now that the UK is no longer a member of the EU. A consultation was held in the second quarter of 2023 which was more in the nature of 'how shall we do this?' than 'what do you think of these proposals?' and nothing has happened since, although the incoming Labour Government has confirmed it will implement EORs. One benefit of a new regime, regardless of what it contains, will be a reset in terms of documentation and a chance to start small again.

Environmental Statements have been getting longer and longer over time. This is not in response to increased legal requirements, although it may be the fear of legal challenge that has resulted in the inclusion of more rather than less material. This may often be counterproductive.

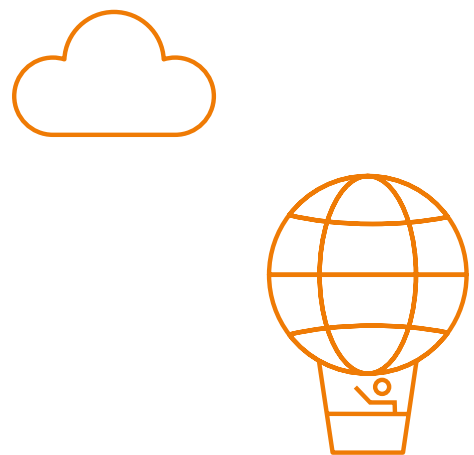
Some suggestions to incentivise shorter Environmental Statements

Whether or not EORs are implemented, there are steps that could be taken to incentivise the production of shorter ESs and a more efficient consideration of them.

One is to require a statement at the very front of an ES/ EOR setting out what environmental impacts of the development remain significantly adverse even after the mitigation that is proposed. Currently, these are buried among the many ES chapters and are difficult to find. Declaring them up front should incentivise the minimisation or elimination of such impacts and effects, and change the focus of the ES to this subject.

Secondly, could the Government establish certain overarching assumptions and principles that obviate their coverage at a project or plan level? The Levelling Up and Regeneration Act 2023 has allowed 'national development management policies' to be set by the Government, effectively providing text for planning authorities' local plans that is common to all. Could not the Government declare national Environmental Assessment provisions that would be taken as included in all ESs without having to be written into them each time? This could dramatically decrease the amount of text on policy and methodology, for example, that is copied from statement to statement.

Thirdly, the Government could be more prescriptive about the size and structure of ESs/EORs, such as restricting more technical data to appendices, though perhaps size reduction incentives are likely to be more successful than one-size-fits-all compulsion. The EOR consultation hinted at this, so let's see if they deliver.



A Local Planning Authority's (LPA) perspective on proportionately in EIA

Proportionality has been a long-stated desire for those involved at every stage of EIA. No-one wants to become entrenched in unnecessary process or wade through superfluous information. But you need to get the basics right if you want to cut to the chase. As the EIA Officer at London Borough of Tower Hamlets (LBTH) for nearly seven years, I have seen a lot of projects get those basics wrong.

Do you really need an EIA?

Surely the best way to get a proportionate EIA is not to do one at all. It's very common in LBTH for applicants to determine themselves that projects are an EIA development, and therefore they miss the screening stage and come straight to scoping or even the EIA. LBTH will rarely issue a positive EIA Screening Opinion (two since the 2017 EIA Regulations came into force). There has been more than one occasion where I've questioned if I would have determined a proposed development as EIA. Though it is accepted that fear of legal challenge surrounding a proposed development can prompt the applicant to follow a precautionary approach, once a proposed development is EIA there's no going back: the EIA must meet all the requirements of the Regulations.

Get the scoping right

As Rob Brydges has already outlined, effective scoping is key to delivering proportionate EIA. But, more often than not, when EIA consultants try to justify omitting aspects from the EIA, perhaps even citing proportionality as justification, they don't give the detail we need to endorse that approach. I would really stress that what I need to agree to scope something back or out

all together from an ES, is sufficient justification that the proposed development is not likely to result in a significant effect. Without this the LPA is left with little option but to scope it back in.

Where there's uncertainty or insufficient confidence from the Scoping Report whether an aspect would result in a likely significant effect (LSE), LBTH will always make clear in our Scoping Opinions that an aspect should be scoped in. We will prompt applicants for further justification and leave the door open for this information. This might necessitate pre-assessment which can be crucial for more complex matters. In other words, do just enough assessment to prove the point rather than going all out. It is then for the EIA Consultant to follow up with the LPA, for example, through an EIA focused pre-application meeting to discuss further and provide the additional information required, and then later replicate this information in the ES.

Ensuring sufficient information

You'd be surprised how frequently an ES will ignore the fact a matter has been scoped in within the Scoping Opinion, resulting in a Regulation 25 request (which allows a consenting authority to seek additional environmental information).

Another frequent reason LBTH must undertake Regulation 25 consultations, is where Non-Technical Summaries (NTS) do not report LSEs. Applicants argue that the NTS is only a summary, and the ES provides more information. However, this loses sight of the main purpose of the EIA and of the NTS to communicate the LSEs of the Proposed Development to the public and consultees without having to refer to the ES. A

proportionate NTS can still be brief, but it must meet its purpose under the EIA Regulations to communicate the LSE.

Pre-application and consultations

It can be difficult to scope out aspects from the ES if there's specific concern from council or external consultees, especially when there's uncertainty in the Scoping Report. EIA focused pre-application meetings can be really helpful to understand early on which aspects are likely to need further work to scope out or require specific engagement with consultees.

What I need to agree to scope something back or out all together from an ES, is sufficient justification that the proposed development is not likely to result in a significant effect.

The ES must be based on the Scoping Opinion, however, I would still view the scoping process as iterative, with the Scoping Opinion being a snapshot in time, based on the information available within the Scoping Report. Where there's positive and constructive engagement between the LPA and Applicant through the EIA and development process, this will ultimately result in a better ES, better outcomes within the ES, and a better development overall.

Simple measures like giving the LPA forewarning that applications are going to be submitted, as well as establishing fee agreements or planning performance agreements prior to submission helps LPAs get more time to consider and discuss with consultees and get external support quickly.

EIA assessments are not required to be perfect, however, the assessments must be defensible and it's important to remember that it's the planning officer that must present the proposed development to a planning committee and have sufficient confidence in the assessments and therefore planning balance that they are reporting.

Final thoughts

We should all strive to continually improve the process of EIA and ES preparation, and there are always efficiencies to be made both on the part of LPAs and by applicant teams and their EIA consultants. However, the ultimate priority is ensuring the ES contains sufficient assessment of the likely significant effects, to enable the LPA to come to a reasoned conclusion. ESs and developments should endeavour to meet best practice, and that must be balanced with proportionality.

I recognise that many authorities may not have the resource for bespoke EIA officers, but this just means that applicants need to do the groundwork that will help deliver proportionate EIA further down the line.

Proportionate EIA across devolved regimes

Introduction

Across the devolved planning regimes within the UK, the requirement to comply with the EIA Regulations is a constant, where one is required. Recognising the recent consultation in Scotland on Electricity Act applications and the growing momentum for Environmental Outcomes Reports (EORs) in England, this article will review common challenges and opportunities, as well as the differentiators between the EIA processes in major infrastructure planning regimes.

Major infrastructure EIA

The European EIA Directive has been transposed in the UK into over 40 regulations, with over 300 authorities bearing responsibility for its implementation.¹¹ Regardless of this diversity, the requirements of the EIA Directive remain common across all.

Core principles such as mitigation hierarchy and Rochdale are implemented throughout EIAs, but there is notable procedural difference between EIAs undertaken for major and nationally significant infrastructure projects, namely those projects which require consent from the devolved Government. These are principally across the pre-application and determination phases of such projects, including the environmental information required for the purposes of statutory consultation and referencing of final EIA deliverables (Environmental Statements vs EIA Reports).

However, there have been some key aspects between regimes which have influenced the recent proposed planning reforms across England, Wales and Scotland, and are also key activities for practitioners. I'll run through these.

Front-loaded principle

Part 5 of the Planning Act sets out statutory requirements for applicants to engage in pre-application consultation with local communities, local authorities and others. This has had a positive impact on EIA with EIA practitioners embedding this process in EIAs across other regimes. Such cross-pollination between regimes and across sectors is demonstrable evidence of transferable learning within the EIA community. It is fundamental to achieving a proportionate approach in any EIA process moving forward when embedded during the production of the Scoping Report, allowing for informed, evidence-led decision-making in the creation of the Scoping Opinion. This, in turn, promotes confidence in the EIA methodology and bridges the relationship between applicant, stakeholder and competent authority.

Electricity Act reforms

Proposed introduction of preliminary information in the recent Electricity Act reforms would bring this in line with the EIA process undertaken under the Planning Act 2008 and Planning Act (Wales) 2015. Whilst this creates a consistency in approach and helps embeds consultation responses into a sustainable design at the point of submission, it also has the potential for challenge in relation to defining exactly what constitutes preliminary environmental information for the purposes of consultation.

Pre-submission checks and balances

While not provided for the purposes of statutory consultation, the Gate Check Report for applications

¹¹ Table 4-1 of WSP's report to the OEP sets these out: WSP (2023). Analysis of the environmental assessment regimes: England and Northern Ireland. OEP. www.theoep.org.uk/sites/default/files/reports-files/WSP.pdf.

under the Electricity Act affords the applicant (and EIA practitioner) an opportunity to demonstrate a project's compliance with the Scoping Report, including adaptation to responses from statutory consultation. This provides the competent authority the opportunity to identify omissions or issues prior to submission.

A bite-sized approach has been implemented under the Planning Act, whereby matters of agreement within the EIA can be agreed via Statements of Common Ground or conversely as Principal Matters of Disagreement if necessary as the EIA progresses.

However, not all Electricity Act applications require this; for example, while onshore projects to the Energy Consents Unit have submitted this report, recent offshore wind projects submitted to the Marine Directorate have not, relying instead on a less certain, though still potentially productive, collaboration during the pre-application process. A more bite-sized approach has been implemented under the Planning Act, whereby matters of agreement within the EIA can be agreed via Statements of Common Ground or conversely as Principal Matters of Disagreement if necessary as the EIA progresses.

Twin tracking and deemed consents

All regimes allow for an aspect of 'deemed' consents, albeit with the Planning Act 2008 enabling a greater range of secondary permissions to be included within the Development Consent Order. Efficiencies can be recognised between the production of the ES and information required to inform secondary consents, permits and licences (whether these are deemed or twin tracked alongside the application) or other assessments, such as Habitats Regulation Assessment.

Good authorship and signposting help synergise this twin-track approach, although challenges can arise with repetition and duplication between primary and secondary applications, or cause confusion where differing levels of maturity in information have been used (for example, in the maturity of project information between an ES and Environmental Permit for emissions to air, land and water). This can result in version control issues across multiple aspects of the project being determined by different competent authorities and consultation fatigue and confusion.

Cross-border differences

Between the EIA Regulations of England, Scotland and Wales, only England is proposing significant changes to the EIA process regardless of the scale and nature of the project. The introduction of EORs under the Levelling Up and Regeneration Act 2023 will present a challenge for those projects which are cross border (such as linear infrastructure). Noting the responses to the 2023 consultation, it will be imperative that cross-border facilitation of the EIA process is not a burden nor a blocker to the ability for these projects to be delivered, and this needs to be recognised by those producing, determining and commenting on the respective applications. Such additional complexity will hardly support wider Government ambitions for proportionality.

Looking forward

EIA Regulation provides practitioners with the legislative framework for due procedural process, and there are key challenges and opportunities for any and all projects regardless of their location and jurisdiction. However, practitioners are key to driving proportionate EIA through keen and justified scoping, which provides the evidence-led decision-making in any regime. Consistency in the Regulations does afford all those involved in EIA some common ground, and facilitating key transferable learning across regime, geography and sector will also drive transformative behavioural changes alongside planning and procedural reform. All eyes are on the horizon for EIA and planning reforms to be implemented, and there is no doubt that EORs will be the biggest fundamental difference across the geographies if and when implemented.

The art of proportionate ES writing

Introduction

When it comes to EIAs, the quality of the ES or EIA Report plays a critical role in shaping the project's approval process. A well-structured report at each stage of the EIA lifecycle can facilitate decision-making by smoothing the approval process and ensuring that the environmental impact of the project is understood and managed effectively. The goal is to provide a clear, concise and relevant report that focuses on the key environmental effects of a project – without getting bogged down in unnecessary details. The EIA Regulations are helpful in this respect: it is all about likely significant effects; if a predicted effect is neither likely nor significant, then it doesn't need to be reported.

Via years of EIA review experience, we've seen how overly complex documents can slow down the approval process by raising challenge over issues that are not significant and add unnecessary costs to the project. On the other hand, an ES that is too vague or incomplete can lead to regulatory roadblocks and delays. Striking the right balance between comprehensive coverage and concise reporting is key.

EIA Reports have become longer over time for several reasons, including the fear of legal challenge if material is omitted and greater expectations from the determining authorities on the level of detail required in the ES. This may be because the regulatory audience may not have the expertise and therefore confidence to see information omitted. As such, EIA consultants have increasingly erred on the side of caution to avoid the risk of being requested to provide further information. This approach can be counterproductive as longer documents may be more likely to evoke challenge simply because they have more material that is challengeable.

Steps to writing a proportionate EIA Report

1. Get the scope right from the start

The first step is determining the right scope for your assessment. Scoping serves as the backbone of the entire EIA Report and is critical for identifying which issues matter most. By engaging early with consultees and environmental experts, you can pinpoint the key environmental concerns and scope out unnecessary assessments that will not affect the final decision or simply scope back some of the less important matters that are unlikely to result in a significant effect. Furthermore, an independent review at scoping stage can reduce the risk of potential clarifications and requests for further information at the EIA Report review stage. Of course, getting all parties to agree a proportionate scope is a challenge in itself, as Rob Brydges has already outlined.

2. Brief the EIA technical team

As an EIA co-ordinator, it is important to fully brief the EIA technical teams, some of whom may be less familiar with EIA. Provide ES chapter templates that guide the technical authors to write succinctly and avoid including excessive technical information which can be appended. Regularly remind specialists of proportionate writing throughout the EIA process, from scoping onwards.

3. Assess environmental impacts proportionately

Proportionate assessment results in proportionate reporting – not all environmental impacts are the same, so it's important to prioritise the ones that truly matter, rather than trying to cover every possible environmental concern in excessive detail. That is why the EIA Regulations require that EIA Reports focus on likely significant effects. Consider direct, indirect and cumulative effects, however, be mindful not to

overcomplicate the analysis. A clear and transparent methodology for determining the significance of each impact will help keep the assessment focused and proportionate. Only include baseline data that is key to underpinning the EIA.

The incorporation of mitigation measures within the assessment process is effective in addressing easily mitigated issues. By developing a comprehensive draft code of construction practice or Construction Environmental Management Plan (CEMP) early in the project and instructing the team to adopt these standard best practice measures, it is possible to avoid the inclusion of excessive and irrelevant content concerning improbable scenarios. This approach eliminates the need for lengthy discussions on unlikely situations, such as not screening the construction sites or damping down stockpiles which can be considered as part of the inherent mitigation of a project.

4. Keep the ES clear and concise

Good writing guidance could be the subject of an entire journal. It's surprising how little emphasis is given to strong writing skills in the EIA business; it is so often just assumed. EIA Reports are the culmination of sometimes years of work, so it seems right that they are created with attention and care, and that they represent that hard work in the best way possible.

A well-structured and easy-to-read EIA Report is more likely to capture the attention of consultees and decision-makers. Use simple, direct language and avoid jargon or overly technical terms that could confuse non-expert readers. Visual aids such as maps, charts and tables can also help to present complex data in a clear and digestible format.

It's essential to summarise key findings so that decision-makers can quickly grasp the most important points. A useful approach is to tabulate the summary of effects, along with the associated mitigation and monitoring measures and details on how they should be secured.

To reduce lengthy reports, be transparent about your methodologies and provide justifications for exclusions

made in the assessment. The aim is to ensure that your EIA Report is legally robust enough to withstand scrutiny during the review process, without including unnecessary bulk.

5. Use a strong editing team

A proportionate ES/EIA Report relies on a strong, experienced and informed editing team. Reducing report waffle can be challenging, so having a skilled editor with a strong understanding of the subject matter is crucial to ensure the assessment is both well-written and technically sound.

Editors must be capable (and confident) in challenging technical experts who, while they have the technical knowledge, may be less skilled at proportionate EIA writing and resistant to leaving out any of their hard work.

Editors must be capable (and confident) in challenging technical experts who, while they have the technical knowledge, may be less skilled at proportionate EIA writing and resistant to leaving out any of their hard work. A good editor needs to make some tough decisions in this respect and work to a strident model to ensure there is a consistent writing style throughout the EIA Report that is easily understood by all stakeholders.

Conclusion

Creating a proportionate EIA Report is about working smarter, not harder. By focusing on the likely significant environmental effects, fully briefing the EIA technical team, assessing impacts in a structured and efficient way, and using a strong editing team, you can produce an EIA Report that is clear, effective and legally compliant.

Proportionate EIA: Lessons from onshore wind EIA practice in Scotland

Introduction

The Onshore Wind Sector Deal for Scotland (OWSD), published in September 2023, is a landmark agreement between Government and industry to collaborate on actions needed to realise the ambition of delivering 20 GW of onshore wind in Scotland by 2030. The EIA Task and Finish Group (EIA-TFG) was established to resolve some of the commitments made through the OWSD and is due to publish EIA guidance for the Scottish onshore wind sector in early 2025. We provide here an early view of this guidance in relation to the delivery of more proportionate assessment.

Delivering on the OWSD commitments

There is currently just under 10GW of onshore wind operating in Scotland, and the OWSD recognises the enormity of the challenges and opportunities associated with doubling this figure in a relatively short timeframe. Currently, projects can take many years to progress through the consenting regime from initial inception to environmental survey work, Environmental Assessment, determination, discharge of conditions, and construction and operation. Therefore, to meet this ambitious target, change needs to be swift, deliverable and effective.

The OWSD identifies 63 commitments across six key themes. The commitments are identified as either Government action, sector action, or collaborative action. One of the six themes of the OWSD relates to planning (specifically EIA) and states, '[w]e will reduce the time it takes to determine ... applications for onshore

wind projects by ... streamlining approaches to scoping Environmental Impact Assessment Reports (EIARs) by using template formats and associated guidance.' To this end, the EIA-TFG was set up at the beginning of 2024 to support the planning objective, including delivering proportionate EIA. The EIA-TFG comprises a wide cross-section of interested parties, including representatives from the Scottish Government, statutory consultees (SEPA, NatureScot and Historic Environment Scotland), developers, EIA practitioners and legal advisers.

EIA guidance

From an early stage, it became clear that the members of the EIA-TFG were strongly aligned on the need for change, and agreed that proportionate EIA, as advocated by EIA practitioners for many years, and which has been the subject of previous IEMA guidance,¹² is not being routinely practised. As EIA practitioners are aware, EIA Reports are usually lengthy, unwieldy and hard to navigate, even for those familiar with these documents. The forthcoming guidance from the EIA-TFG will reiterate the established principles of proportionate EIA, including the need for the EIA process to focus on the importance of effective scoping, the identification of significant effects and the need to streamline often superfluous content from final reporting.

A focus on scoping

While the need for a proportionate approach to EIA is understood and variously addressed elsewhere in this journal volume, the challenge in implementing

¹² IEMA. (2017). Delivering Proportionate EIA – A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice. www.iema.net/resources/news/2017/07/18/iema-iema-declares-call-to-arms-on-delivering-more-proportionate-eia.

these principles requires a consolidated approach by all involved in the EIA process. Practitioners, consultees and consenting authorities must each feel empowered to advocate or support proportionality, for example, through more ambitious scoping where no significant effects are likely to occur. One of the key recommendations of the EIA-TFG relates to the timing of scoping, specifically recommending that this is done at a stage in the process when there is sufficient information on both existing environmental conditions and the proposed development to allow consultees to make a more informed response to proposed scoping recommendations. Building on this theme, the guidance will challenge practitioners to focus on specific points of methodology, approach or scope requiring consultee feedback, while reducing information that is immaterial to the Scoping Opinion.

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Something old; something new

These proposed recommendations reiterate the key messages of earlier guidance around proportionality. But what is new is the opportunity that the EIA-TFG has provided for professionals at each stage of the EIA process to establish a mutual appreciation of respective needs and challenges. In particular, it has allowed consultees and consenting authorities to propose improvements to the methods and approaches in assessment and reporting. This has fostered closer working relationships within the EIA-TFG that will benefit future day-to-day practice. Areas of common

ground have been realised, which have focused on opportunities for streamlining EIA specific to onshore wind, and for standardising approaches where possible, while avoiding overly prescriptive template-style recommendations.

Establishing a new approach

Existing guidance increasingly encourages practitioners to scope boldly. The EIA-TFG has carried these principles forward in seeking to provide an agreed framework for effective scoping of onshore wind projects. With endorsement by Government, statutory consultees and practitioners, the hope is that future EIA for onshore wind can be better focused and ultimately support the changes required to meet the ambitious goal of 20 GW of onshore wind by 2030.

The outputs from the EIA-TFG will be a guidance note informed by and focused at professionals involved in all stages of the EIA process in the onshore wind sector. But its potential for wider application EIA practice as a whole is clear.

Exploring the road toward proportionate assessment and effective outcomes

Environmental Assessment is at a crossroads, not just in England – through mooted Environmental Outcomes Reports (EOR) – but across the world, with governments seeking quicker and less complicated consenting. The previous articles across this volume have explored different aspects of the enigma that is proportionate assessment and the multiple inhibitors that have held back effective progress in this area across the last decade or more. It is clear that, as a profession, we need to get with the programme and to expose and overcome these inhibitors.

Back in 2017, IEMA launched a proportionate EIA strategy,¹³ having spent the previous two years gathering evidence from across all aspects of practice, including inhibitors and opportunities for change. Those inhibitors remain acute, as shown by the Office for Environmental Protection's 2023 review of English Environmental Assessment. If anything, public sector resources are now more stretched, EIA capacity building remains limited, and the opportunity to enable a systemic monitoring feedback loop has been largely missed. In addition, without all those in the custody chain – client, consultants, public, statutory consultees and decision-makers – working to a common goal of assessing and reporting only the salient issues, the majority of Environmental Assessments (and their reports) will continue to include more than they need to.

Of course, proportionate EIA is not simply about making the assessment and write-up as lean as possible. The essential information for each party engaged in the

process will differ based on different perspectives and objectives in managing environmental risk and opportunity in support of effective consenting. As such, when exploring actions to deliver proportionate Environmental Assessment we must recognise these different interests and the complexity of the wider system due to managing potential conflicts, where making positive changes for some may risk negative consequences for others.

To achieve gains in EIA effectiveness on a broader scale requires us to build on examples of effective proportionate practice and promote them at each strategic layer of collaborative action and leadership.

So, improving the effectiveness of this tool requires collaborative efforts. An individual, such as the EIA co-ordinator, can only make so much progress in enabling each specific assessment they lead to be more proportionate. They must gain buy-in from a myriad of others to make more substantive gains. The art of the possible at this individual EIA scale is ably demonstrated in the Cambourne to Cambridge public transport

¹³ IEMA. (2017). Delivering Proportionate EIA – A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice. www.iema.net/resources/news/2017/07/18/iema-iema-declares-call-to-arms-on-delivering-more-proportionate-eia.

project, with WSP's Environmental Statement providing a clear narrative on project, regulatory compliance, effects, significance and mitigation, all within under 150 pages.

Unfortunately, even with such examples, it is hard for gains to carry forward into standard EIA practice. This is partly because each EIA's context is different – client, planning authority, EIA team – and partly because in reality, on some occasions, small uncertainties – design, environmental risk – act to spiral expansively, rather than being able to be managed proportionately. The outcome being that our next assessment and report may be far longer, despite no lesser desire and effort to keep it focused.

Using such a practitioner-led approach to drive broad proportionality gains across the whole of EIA practice has proved slow going, particularly as the context of the wider consenting system remains inhibited by stretched resources and limited feedback loops. To achieve gains in EIA effectiveness on a broader scale requires us to build on examples of effective proportionate practice and promote them at each strategic layer of collaborative action and leadership.

Despite recent central Government rhetoric that the environment slows consenting, the UK actually has a number of examples of delivering such 'next-level' initiatives for effective assessment. A fine example is the work of the EIA Task and Finish Group within Scotland's Onshore Wind Sector Deal (OWSD), which is described by Jo Wotton and Peter Bruce's earlier piece. The OWSD example demonstrates how strategic collaboration and leadership can draw on proportionality successes of individual assessments to evidence an agreed approach to effectiveness across an entire sector's future EIA work.

A further example of such strategic collaborative action for effective EIA is the Department for Infrastructure's environmental governance capacity building work, which involved collaboration with all of Northern Ireland's planning authorities and statutory consultees. While rather different in character to

Scotland's sector deal, the recognition of a need for Government involvement – and dare I say leadership – in collaborative initiatives was a key enabler of broader-scale improvements in EIA's effectiveness. To read more about Northern Ireland's EIA collaborative capacity building work, please see the piece I wrote in Volume 22.¹⁴

Without such strategic initiatives – and notably the involvement of Government to lend its authority to them – many 'quick wins' known to EIA practitioners remain marginal in standard practice despite clear benefits and limited downside. For example, the inclusion of a single-side summary of key significance outcomes and mitigatory actions to start each topic chapter; making the assessment's key findings readily accessible to save time for consenting authority and consultees; and making the consultants' work on the Non-Technical Summary far more efficient.

As a profession, we must therefore recognise a couple of painful truths. The first is that, perhaps inevitably, our bottom-up, practitioner-led, proportionate EIA efforts of the last decade have proved insufficient to overcome the real-world and wider inhibitors of effective assessment and timely consenting. The second is that the future of Environmental Assessment in England is now outside our control, sitting squarely in the hands of the Government, who must now define how EOR and related system changes will function. As Angus Walker has said, perhaps this new approach can provide the framework for more proportionate assessment.

For many EIA professionals these truths will give them concerns, but this is the reality of 2025 and we must accept it and get with the programme if we are to continue to make Environmental Assessment – both English EOR and wider UK (/beyond) EIA and SEA – effective and fit for the future.

¹⁴ See pages 15–17 of Volume 22 of the IEMA IA Outlook Journal (IEMA, August 2024). www.iema.net/media/2f5g2fgh/iema_iaoj_vol_22_final.pdf.

Make the Most of IEMA's Impact Assessment Resources

IEMA's website includes a host of content and tools designed to support IA professionals at every stage of their careers. From guidance and case studies to webinars and networking opportunities, the resources available are invaluable – but often underutilised. Here's a guide to what's on offer and how you can take full advantage:

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- Effective Scoping of Human Health in Environmental Impact Assessment
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Summary

As Environmental Assessment, in both process and product, has grown exponentially, the transparency of decision-making has diminished, with key information often difficult to find or understand when it is. While a return to a more proportional approach has long been discussed, little change in practice has been evident. Now, even Government is pushing for a move away from 'voluminous and costly documents'.

The potential solutions are acknowledged. The articles in this volume provide some clear advice, with examples of the practicalities of being proportionate. Certain key themes have emerged.

Several authors identified stronger scoping as the cornerstone of proportionality. Early and meaningful consultation, backed by thorough baseline research makes this possible, but with many stakeholders involved, all need to be on board.

Clear communication and collaboration between environmental and design teams can help scope out unnecessary elements, as can sufficient concise justification of elements that are scoped out and ensuring that, throughout the process, the focus stays on significant effects.

Close working between the environmental and design and planning teams is an important way of designing out impacts early in the project lifecycle, with a focus on integrated mitigation that obviates detailed assessments of unlikely scenarios. From a strategic point of view, building on earlier assessments can also help avoid duplication by referencing existing data and recommendations.

In terms of proportionate reporting, the authors provide some practical advice on succinct report-writing, emphasising a focus on significant effects and omission of superfluous detail. The need to hone and prioritise skills in good writing and presentation is clear, while use of a strong editing team is essential to challenge experts and retain a clear and consistent narrative, while still being legally robust. In fact, overly long EIA Reports could actually increase the risk of legal challenges because of the likelihood of inconsistencies.

Emerging EIA practice for the onshore wind sector in Scotland is a good example of how the various participants can work together to deliver proportionality. Deliberate and reasoned scoping using sufficiently detailed information is identified as an important approach, combined with early engagement with consultees and statutory authorities. Environmental Assessment of major projects has presented opportunities for efficiency, which other regimes can learn from.

However, while the necessary steps are clear, their implementation requires collaboration across the assessment custody chain. Mooted Environmental Outcomes Reports may present the opportunity to bake in proportionality through regulation and statutory guidance, though its implementation within England alone would present consistency challenges across devolved regimes in the UK and may result in doubling up in Environmental Assessment.

Nick Giesler
March 2025

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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. Founded in 2011, 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.

Delivering proportionality in Impact Assessment

This 24th edition of the Impact Assessment Outlook Journal provides a series of thought pieces on delivering proportionality in Impact Assessment. In this edition, the Guest Editor, Nick Giesler, has selected eight articles produced by IEMA Q-Mark professionals and Impact Assessment experts. The result is a valuable yet quick read across some of the different aspects of proportionality in Impact Assessment.

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Nick has worked in EIA and environmental planning for 35 years. He has led and served on the leadership team for EIA on some of the UK's largest infrastructure projects, and has experience across multiple sectors. He worked for Transport for London as Head of Environment on Crossrail 2, and he provided principal authorship on all of HS2's Appraisals of Sustainability. Since 2021, Nick has been Head of Profession for WSP's Environmental Management and Assessment team. In this role, he is leading their Future Ready EIA initiatives that seek to embed efficiency and proportionality across several aspects of EIA. Nick recently led the research commission for the Office for Environmental Protection in its review and critique of Environmental Assessment in England and Northern Ireland that culminated in direct advice and recommendations to Government.





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