

1. Introduction

Environmental impact assessment (EIA) is the process that identifies and evaluates the potential impacts of a development on the environment. The results are presented as the Environmental Statement. The key steps in EIA are:

- scoping the issues
- baseline data collection
- stakeholder consultation
- impact assessment
- development of mitigation
- drafting the Environmental Statement and non-technical summary.

Cambrensis follows established guidance on good practice in EIA, including that from UK Government Departments. This document presents an overview of how Cambrensis undertakes a typical EIA (whilst recognising that each development has unique characteristics and may pose site-specific issues).

2. Scoping

'Scoping' is the process that leads to the definition of the issues to be addressed in the EIA and presented in the Environmental Statement (ES) for review by the competent authority. Scoping is the first step in any EIA, setting as it does the overall framework.

A fundamental question for any EIA is which phases and activities are to be included, for example:

- Site investigations
- Construction
- Operation
- Waste disposal
- Site Decommissioning.

EIA Regulations provide that developers may request a scoping opinion from the Secretary of State. The scoping opinion will effectively seek approval for the whole process from an early start, not only from the Secretary of State but also from all the consultation bodies.

Initially, we would prepare the study documents required to accompany the request for a Scoping Opinion in the form of a Scoping Report. The scoping study will involve the following steps:

- Collection and assimilation of readily available material on the proposed scheme and the environmental and planning constraints associated with the site and its environs
- Identification of the key environmental and social issues associated with each site, based on information held by the developer, published maps, and websites
- Site visits by our EIA Co-ordinator and key technical specialists to validate the baseline data collected above
- Stakeholder consultation, involving an initial approach to inform them of the impending decision to seek planning permission for a new development, a formal request for information and views via correspondence, follow up workshops and meetings. In addition, consultation with statutory and some key non statutory bodies will involve discussion and where possible commitment to an agreed methodology for the EIA. However, we are aware that some non statutory organisations do not wish to make any agreements during the EIA so that they feel free to raise objections during Public Inquiries.
- Preparation of the scoping report (Box No. 1).
- Submission of the request for a scoping opinion to the Secretary of State, accompanied by the Scoping Report.

Box No. 1**Proposed Structure and Contents of the Scoping Report**

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| 1 | Introduction – 2 pages
Covering the need for the scheme; requirements for an EIA; and objectives of the Scoping Report |
| 2 | Summary of Consultations – 2-3 pages
Summary of who has been consulted, how, their views on the scheme and the approach to the EIA, and where these are followed up in the Scoping Report. |
| 3 | The Study Area – 3-4 pages
A brief description of the location and its setting, including key features at the site, its surrounds, and along main transport approaches. |
| 4 | The Proposed Scheme – 3-4 pages
A description of the proposed layout and dimensions; the type of facility; and key construction, operation and decommissioning issues. |
| 5 | Methodology for the EIA – 10-12 pages
Topic by topic summary of the legal and planning framework, environmental and social aspects of the scheme, potential impacts, proposed approach to assessments, and generic options for mitigation. |
| 6 | Structure and Contents of the EIA – 2 pages |

Illustrations

- Environmental and planning constraints maps
- Layout of the proposed nuclear power station
- Artist's impression of the nuclear power station in its wider setting
- Photographs of the existing site

Technical Appendices

To include eg a copy of the consultation letter and citations for designated sites in the area.

3.***Baseline Data Collection***

Baseline data collection commences during the Scoping Stage and continues throughout the EIA. We identify additional information which is not readily available in the public domain but likely to be required by the regulatory authorities.

We carry out a high level data review to check for coverage by topic, geographical spread and duration of record, leading to the identification of gaps in the data set and the commissioning of additional surveys. For possible survey topic see Box 2. Particular attention will be given at the outset to organising the acquisition of baseline data that has to be collected over significant time periods, for example throughout several seasons or years (eg certain biodiversity/ecological data).

4. *Impact Assessment*

The EIA Regulations require the significant effects of the development to be considered, including direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects.

Cambrensis specialists are well versed in identifying and assessing different types of environmental impacts and their characteristics, whilst recognising that the assessment of cumulative effects can be both problematic and significant.

The general approach to assessment entails identification of the environmental aspects of the project, the magnitude of the impact on the resource or receptor, the value placed on the resource / receptor, and an assessment of the significance of the effect.

Each assessment topic will be controlled by a Cambrensis Technical Leader, who will oversee the selection and application of specific methodologies to ensure appropriate methods and review the studies.

The integration of the design team (eg civil engineers, development planners, architects) and the EIA team is extremely important to the overall success of the project. We firmly believe that there should always be early and continued interaction to facilitate exchange of information, develop a robust assessment of impacts and integrate mitigation measures into design. We achieve this through regular progress meetings, direct discussion between EIA and design teams, and preparation of internal technical notes and working papers to identify/clarify key issues.

5. Mitigation

As adverse impacts are identified, our technical specialists will identify a range of possible mitigation measures to avoid, reduce and where possible offset the adverse impacts. We follow the established mitigation hierarchy of avoidance, reduction, remediation, compensation and enhancement.

In developing mitigation proposals, our specialists will consider the effectiveness of the proposed mitigation measure, capital and recurrent costs, programme and responsibility for implementation, long term maintenance and alternatives for achieving the same effect. Alternative mitigation measures will be discussed with the developer and the preferred proposals will be developed in detail. The Environmental Statements will describe only those mitigation measures which the developer is committed to implement.

The EIA will consider the environmental impacts of the mitigation measures themselves and evaluate the significance of the residual effects, that is the environmental and social impacts of the mitigated scheme.

6. Contents and Structure of the Environmental Statements

Under the EIA Regulations, the information to be included within an Environmental Statement is specified in the Regulations. Each Statement will comprise a number of introductory chapters, followed by topic specific chapters that detail the impact assessment and mitigation, an outline environmental management plan and conclusions (Box 2).

The introduction will identify the proposed scheme, set out why the Environmental Statement is required and outline its structure. The methodology section will provide an overview of the main steps taken in the EIA, with technical details presented in the topic chapters or technical appendices. We will include a summary of consultation, setting out which organisations have been consulted, the main issues, and where these are addressed in the Environmental Statement.

The section on the proposed scheme will provide a description of the site, the design of the proposed works and size of the

project. This chapter will be detailed and will include information provided by the developer.

Box No. 2 Proposed Structure for Environmental Statements

Non-technical Summary

1. Introduction
2. Methodology
3. Description of the proposed development
4. Air quality and climate change
5. Archaeology and cultural heritage
6. Ecology and nature conservation
7. Geology, hydrogeology and soils
8. Landscape and visual impacts
9. Noise and vibration
10. Socio-economic impacts
11. Surface water resources
12. Traffic and transport
13. Policies and plans
14. Outline environmental management plan
15. Conclusions

Supporting drawings, illustrations, and photographs

Technical Appendices – as required.

The assessment of alternatives will be a vital component, attracting scrutiny throughout the planning process. Any objectors to the proposals may demand an assessment of alternatives to the development. The Environmental Statement should include discussion of these options and the justification for the development proposed drawn from the National Policy Statement.

The main body of the EIA will be presented on a topic by topic basis. Each chapter will describe the legal and planning regulatory framework, the methodology, the results of the

baseline assessment, the impact assessment, proposals for committed mitigation, the residual impact of the mitigated scheme and proposals for monitoring.

The Outline Environmental Management Plan is very important, as it will set out how the developer will manage the development in such a way as to minimise the potential adverse environmental impacts. The Plan will include:

- Administrative arrangements for environmental management;
- Site management during construction, operation and eventual de-commissioning;
- Site security and integrity, including human and animal intrusion;
- Fire safety measures;
- Transport safety, including for construction materials and waste disposal;
- Safety of electricity generating plant;
- Health and safety aspects for staff and neighbours;
- Release of emissions and wastes;
- Emergency arrangements;
- A mitigation plan that sets out what mitigation measures will be implemented at different phases of the works and responsibilities; and
- A monitoring plan that sets out proposals for (a) monitoring the implementation of the EMP and (b) environmental monitoring to evaluate the efficacy of the mitigation measures and impacts on the environment. The monitoring strategy will be prepared for each of the key phases of the development.

The non-technical summary will be prepared as a stand alone document that can be bound into the ES and also provided separately. We find that it can be advantageous to produce a non-technical summary as a glossy leaflet for distribution to a large number of residents and other stakeholders.

7. Stakeholder Engagement

Stakeholder engagement for a development site is an on-going, long term process. There may be peaks and troughs in activity

and shifts in focus, the balance between different communication channels may alter but it is essentially a strategic process that needs to be managed and resourced as such. Future requirements need to be anticipated and approaches made to local authorities, other key stakeholder organisations, opinion formers, members of any action groups and the local media.

EIA consultations should be seen as an opportunity, rather than a threat to stakeholder relations, and the aim should be to leave a positive legacy around the development.

There are potential difficulties that need to be addressed in EIA stakeholder programmes but it needs to be remembered that participants usually add real value to the process; engagement is not just about gaining 'buy-in' to the project or complying with regulations. They contribute through experience of EIAs and technical issues, through their views on priorities and mitigation measures, through knowledge of local issues and environment, and in many other less obvious ways.

Although it is tempting to focus on pressure groups and the 'opposition' when developing EIA engagement, there are many other important constituencies – including statutory consultees, local authorities and regulators – who will play a major part and who need to be involved in the development of the engagement programme. The pressure groups may exert peak PR leverage but other stakeholders arguably have more real influence.

Part of the EIA stakeholder team's task is to maintain good relationships with engineering teams and keep their support. They have an important role in presenting information and resolving comments and they need to be trusted by the community.

EIA studies are common targets for challenge and stakeholder engagement has therefore to be rigorously and professionally organised. Great care has to be taken that all the relevant information has been made available to consultees. Compliance with the Aarhus and Espoo conventions (covering access to information and environmental justice and transboundary engagement respectively) has to be ensured.

It usually makes sense to set up a separate team to handle stakeholder programme logistics. The process is complex and may involve quite large numbers of people and subcontractors. The administration of stakeholder registers, distribution lists, web sites and comment processing and technical response has to be very efficient and auditable. It requires a significant amount of preparation and is vital to get the detail right.

The priority is to keep arrangements as simple as possible and the aim should be to deliver them flawlessly. It is important to keep the steps straightforward and separate from on-going community engagement, both from a practical point of view and so that it is clear what is and is not included if it has to be defended against challenge.

Engagement in EIA programmes normally focuses on consultation rather than dialogue. The process itself normally starts with relatively informal 'pre-scoping' discussions with key stakeholders to develop an outline stakeholder engagement plan and get initial feedback on the proposed EIA scope.

Notification is the first formal step, during which stakeholders are made aware of the proposed EIAs and the projects they are supporting.

Scoping then seeks comment on the scope, project outline, engagement plan and provisions for release of supporting information. It normally comprises a combination of workshops for key stakeholders and conventional consultation documents.

The main consultation is framed around the draft EIA. It normally comprises a more wide-ranging combination of outreach activities, public events and consultation documents with both local and national dimension. EU guidance suggests that public exhibitions and site 'EIA fora' may be preferable to public meetings, but this is a matter for judgement for each development.

Finally, feedback has to be provided on the comments received and the EIA updated to reflect those comments that have been accepted.