EIA Destination Hillend

The environmental impact assessment Destination Hillend deals with the proposed redevelopment of the existing Snowsports Centre, located on the Pentlands within view of the city of Edinburgh. The redevelopment includes an addition of leisure facilities such as an alpine coaster and a zipline, accommodation for tourists including a glamping site and hotel development as well as further infrastructure like restaurants and associated retail space.
The development also contains a new reception building for the Snowsports Centre and an activity dome with high ropes and soft play.
The development will also have an economic benefit, as it is supposed to attract not only a larger number of tourists, but also tourists that may stay longer than only for a day, which leads to 50 jobs in the new built infrastructure, e.g. food court kiosks, the retail unit and the hotel as well as about 30 new jobs within the council.
The development will be funded with £13.8 million by the Midlothian council. (Midlothian Council website)
The application was received in December 2018 and the pre-application consultation was agreed on in January 2019. More than 200 People were consulted in a public event in January 2019, where they could state their opinion on the development which was approved by the majority. In March 2019 Sweco was commissioned to produce an Environmental Impact Assessment and the scoping was issued by the beginning of June 2019. The application for the planning permission was received in December 2019. Currently the status of the planning application is undecided. (Midlothian Planning and Building Standards Portal)

In Chapter 4-11 of the impact assessment, different possible impacts and their likeliness are described, such as noise and vibration, flooding, air quality, biodiversity, socioeconomics, landscape and visual impact, traffic and transport and cultural heritage. Various methods were used to achieve the findings presented. They include considering important documents for example the National Planning Framework, the Midlothian Local Development Plan or other different acts and guidance's that apply for the different aspects of the chapters. Each chapter has a paragraph that states the methodology used to approach the specific impacts, which makes it very comprehensible. The methodology depends on the topic of the corresponding chapter. For impacts on noise and vibration, air quality, flooding and traffic and transport, measured data of the current situation was used as a base to calculate the future development. In some cases, also certain aspects were modelled, for example in chapter 6, where "the most up-to-date version of the Atmospheric Dispersion Modelling System ADMS-Roads Extra" (EIA Appendix 6.1: Air Quality 2.2.) was used to forecast future measurements. Most of the data is provided by the Midlothian council, who also induced the development, pays for it and has also set up the Local Development plan in 2017. Because of that they have a big interest on the Environmental Impact Assessment being in their favour so they can proceed the development without further costs, but the development should also not undermine the goals that they've set by themselves,

so acting on the assumption that the data they provide is correct, this shouldn't have an impact on the outcome of the Environmental Impact Assessment. Also, the local development plan is a document set up to "promote and manage sustainable growth" (Local Development Plan 2017: 1.1.3) in terms of infrastructure, sustainable travel and "mitigation against impacts of development on environmental and cultural assets" (Local Development Plan 2017: 1.1.3). This means that negative impacts should not only be reduced as much as possible, but a sustainable development was most likely a design requirement from the beginning on. It was also taken into consideration that the development meets further acts and guidance's which are stated in the chapters. Following results are given through use of modelling and calculating: A rise of noise levels is expected "due to the greater activity on site" (EIA, chapter 4.7.30), mainly regarding the proposed hotel. There is no change caused by the attractions on the other examined residential areas expected. The effects of road traffic noise are also considered not significant (EIA, chapter 4.7.26). This chapter also corelates with chapter 10 on traffic and transport, since road traffic noise is also considered in chapter about noise and vibration. There are "no design interventions proposed for Traffic and Transport" (EIA, chapter 10.6.1) but as it is expected that most of the visitors get there by car, while it is also said that "public transport will be encouraged" (EIA, chapter 10.4.22) there could have been a suggestion to increase the use of public transport with good and fast bus connections and a limitation of the number of parking spaces, which would make using a car to get there less attractive and would also beneficial for other aspects such as surface water management or biodiversity. However, a study on the risk of flooding has shown that the probability on flooding is quite low (EIA, chapter 5.5.14, Table 5.3), so this aspect has been neglected in favour of economic factors, such as parking spaces for many guests and the associated infrastructure. The chapter on air quality is also linked to traffic, since increasing traffic can also lead to a higher air pollution. The impact through traffic is classified as mostly negligible. (EIA, chapter 6.7) Nevertheless it is said that "mitigation measures should be appropriate for a 'Medium' risk level" (EIA, chapter 6.8.1) and "the contractor will be required to detail appropriate dust risk measures" (EIA, chapter 6.8.2.).

For the chapters on socioeconomics and cultural heritage, the methodology was an analysis. In terms of socioeconomics it was analysed whether the proposed development acts upon the current Midlothian Tourism Action Plan and employment was analysed on a sub-regional level, since no impacts going beyond this are expected. Employment in the construction sector is also considered and expected to be sourced mostly in Scotland, with about 90% of the contractors coming from here (EIA, chapter 8.4.22). The upfront capital investment is also assessed and it's "expected to at least equal the ongoing costs of subsidisation over a 30-year period" (EIA, chapter 8.4.25) and the area is supposed to be "designated for the local employment and economy impacts" (EIA, chapter 6.4.26)

For impacts on cultural heritage the method was a desk-based study to identify sites of cultural value, their importance, possible impacts and mitigation measures that can "eliminate, reduce or offset adverse effects" (EIA, chapter 11.4.2). For the study, data such as the National Record of the Historic Environment, National Collection of Aerial

Photography or historic maps held by the national Library of Scotland was used. Also, a qualified archaeologist undertook a site visit in June 2019. (EIA, chapter 11.4.7) There is one scheduled Monument in the inner study area that might be affected by the new development which is the Caerketton Hill fort. (EIA, chapter 11.5.15) The local Development Plan also shows only this one Monument and the area neither has national important historic battlefields or nationally important gardens and designed landscapes. (Local Development Plan 2017). It is suggested to keep 25m to the fort to prevent the unlikely event of "accidental damage to heritage assets outside the construction footprint from uncontrolled plant movement" (EIA, chapter 11.6.1)
In the chapter on visual impact, the development is approached via various viewpoints, most of which are located within a 2 km radius of the site. Some more distant viewpoints such as Arthur's seat are also included. (EIA, chapter 9.4.9) in Addition to that a visual impact assessment was conducted, where it was "acknowledged that the site is located on the southern extend of Edinburgh's 'urban area' and therefore the local townscape context is a consideration in the landscape character assessment" (EIA, chapter 9.4.13). So that no unlikely effects are overseen, also a worst-case scenario was developed, which will also "reduce the risk of later design modifications falling outside of the assessment" (EIA, chapter 9.4.24). The methodology seems to be appropriate especially the worst-case scenario as a method to identify and evaluate the worst possible outcome, apart from it not being clarified who is the judge on this. It is only said that "professional judgement will be used to produce the assessment of effects" (EIA, chapter 9.4.17). Although the further explanations of the chapter are understandable, it would be useful to know the background against which these decisions were taken and who was consulted. The perception of landscape can be very different individually and the tolerance towards changes in the landscape can vary depending on the person and its background and experiences linked to the landscape concerned.
It is not possible now to determine the extent to which there will be an insistence on biodiversity, as the relevant chapter is not available online, but since the local development plan only includes a small regionally and locally important nature conservation site in the southern part of the area and this doesn't seem to be affected by the development anyway, it can be assumed that the impact on biodiversity wouldn't be very significant either.

On the question if the Environmental Impact Assessment guarantees a sustainable development it can be argued from both an environmental or an economic point of view.
From an economic perspective, the development seems to make sense. The £13.8 million investment by the Midlothian council (Midlothian Council website) to build new attractions and expand the existing facilities, creates new jobs and supports the local economy by increasing tourism and related infrastructure in the form of restaurants, shops and accommodation for tourists. From an environmental point of view, it is also not really to be considered critical. This is mainly because it is a just an addition to the existing Snowsports Centre. Most of the impacts will be temporary during the construction period or are negligible because of the impacts being very low. This is the

case, for example, with the quality of the air or water, which is only minimally affected by the expansion of the site. The most controversial point in my opinion is the impact on the landscape. The area is considered a special landscape area as well as a country park (Midlothian development plan 2017) and is very well visible from different points of view in the direct surroundings but also from further distance like from Arthur's seat. It is mentioned that from these viewpoints there might be a change, which is clearly visible, but in my opinion this is negligible as well, since the existing facilities are already a highly visible part of the landscape and the addition of the new attractions will only lead to a minor change after the construction is finished. The project would be more controversial if the Snowsports Centre wouldn't already exist, because the change in the landscape would be far more significant in that case.

Another critical point is the influence on biodiversity, as this chapter is not available on the website of the Council of Edinburgh at the current time (27.02.2020). This means that it is not possible at this stage to assess conclusively whether the Environmental Impact Assessment is appropriate for all environmental aspects and enables sustainable development, or whether aspects of nature conservation are falling behind in comparison to the economic benefits. although it doesn't appear as if this is the case.

In general, it can be said that an Environmental Impact Assessment has a great potential to ensure sustainable development. If done well, which in my opinion is the case for the Destination Hillend development except for chapter 7 not being available right now, all possible influences, beneficial or adverse, can be presented in a comprehensible way and enable an objective evaluation of the project. However, if the Environmental Impact Assessment is badly done, this might not be the case. It therefore depends very much on the quality of the Environmental Impact Assessment itself, the up-to-dateness of the data used and an equal consideration of environmental and economic aspects whether sustainable development is enhanced through the Environmental Impact Assessment. Also "EIAs need to be conducted early enough in the planning stages that financial commitments have not been made and the project can be changed if needed" (Wright et.al. 2013: 72). This seems to be the case with the proposed development. The planning application has not yet been decided and is still at a concept stage, so there is the possibility to adjust the planning accordingly. However, as the impact of the development is rather small, no major design changes are proposed, so it is a relatively straightforward process in this case.

How sustainable the development is, also depends on the actuality of the limit parameters for the investigated aspects such as e.g. noise, air or water quality, and the underlying guidance's it refers to. Only if the references used are up to date and economically, but also ecologically reasonable, an Environmental Impact Assessment which supports sustainable development can be the outcome. Outdated data, on the other hand, can have an adverse effect on sustainable development, as it is unlikely to be up to date with the latest scientific knowledge and important findings may not be included. Another point of criticism may be who commissioned the Environmental Impact Assessment. Whoever commissions it has an interest in ensuring that it meets their personal requirements, whether from an environmental or an economic perspective. It is hence even more important that the EIA is to adopt a neutral position

and gives the same consideration to all aspects. Money is also an aspect that should not be neglected, since a budget that is too small can lead to a situation where experts cannot be consulted and the Environmental Impact Assessment is therefore carried out with insufficient expertise, which has a negative impact on the results as well (Wright et.al. 2013: 73).

All in all, the Environmental Impact Assessment on Destination Hillend seems to be very comprehensible. Whenever Sweco didn't have an expert in their own team, experts with a multi-annual experience on the given topic were consulted so the expertise on the Environmental Impact Assessment is quite good. In addition, the underlying guidelines are relatively up-to-date and the approach to the various subjects is of a reasonable scope, so that it does not appear that issues have been neglected for lack of time or money.

Destination Hillend therefore seems to be an Environmental Impact Assessment that is quite ideal. The processes leading to the results are comprehensible, it was pointed out what background and experience the authors of the different chapters have, who was consulted and what methodology was used. Overall, hardly any changes to the design were found, but this may be due to the project and the environment not being so controversial and does not necessarily mean that the Environmental Impact Assessment is inadequate. It does not seem that economic reasons outweigh ecological ones, neglecting the absence of chapter 7 on biodiversity and assuming that it has been dealt with just as conscientiously. It can therefore be summarised that this EIA does contribute to environmentally sustainable development for the expansion of the existing Snowsports centre in the Pentlands.

Sources:

Midlothian Planning and Building Standards portal:

https://planning-applications.midlothian.gov.uk/OnlinePlanning/applicationDetails.do?activeTab=summary&keyVal=PK34ELKV0B600)

Midlothian Council website:
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Midlothian development Plan:

http://www.planvu.co.uk/mc2017/

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