Neil Garry

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Rural Planning and EIA

Destination Hillend is the name of the 13.8-million-pound plan to transform the Midlothian Snowsports centre into a year-round, multi activity leisure facility. The planning application was submitted on December 10th, 2019. The planning laid out Midlothian council’s purposed developments such as a new food court, function space and a remodelled reception. They also wanted to build all new attractions for example an activity dome that includes a high ropes course with a soft play area for small children. As well as an Alpine coaster and a zipline. The council wanted to transform the area into a destination where people could visit for multiple days and so they have also laid out plans for a new hotel and glamping accommodation. Currently the centre is mainly used as an educational centre for schools and a public sports venue. However, these new plans hope to transition it into a tourist destination as well. Midlothian council believe that construction could be done within the year 2020.

Midlothian council believes that destination Hillend is needed because they think the area needs to be upgraded. Local councillors have stated that creating Destination Hillend will “increase opportunities for outdoor recreation at the site.” (Sharp 2019) Councillors and consultants also are confident that Hillend can become a sought-after tourist destination. They are confident that new features such as the highest zipline in the UK and the longest alpine coaster in the UK will bring in customers from around the world. Destination Hillend has also been deemed necessary because in 2010 the site faced closure because its expenses were exceeding its income. The creation of Destination Hillend could economically revitalise the site because the improvements could bring in more capital. It is also estimated that 50 full time jobs could be created, and the site could generate income for council servants. Income can also be invested back into important council services such as education, health and social care Finally the snow sports section of destination Hillend can be used all year as a training facility for high level UK snow-sport athletes. Scotland doesn’t receive high amounts of snow and the 2018/2019 winter was one of the worst ski seasons on record for snow cover. Therefore, proposals have been submitted to double the size of the freestyle jump to 1187m2. (Aspden 2019) The public have supported the decision believing that it will be beneficial to Midlothian. In January 2020 upwards of 200 people attended a public consultation to offer their opinions on the project. Consultants working on Destination Hillend commented that they received mostly positive responses in favour of Destination Hillend. (Aspden 2019)

Critically evaluates the processes utilised in one of the main environment chapters contained in the ES (Chapters 4-11).

An Environmental Impact Assessment (EIA) is a method of evaluating the possible environmental impacts of a proposed development. An EIA will do this by breaking down all the likely impacts into chapters such as air quality, cultural heritage and traffic/transport. The Scottish government declares the aim of an Environmental Impact Assessment is to protect the environment by ensuring that the local planning authority is aware of any feasible significant effects. An EIA will factor into the decision-making process of the local planning authority. (Gov.uk 2020) The Destination Hillend EIA was carried out by the european engineering consultancy corporation SWECO. Chapter 5: Flood Risk/Water Quality will be examined, evaluated and compared with other EIA’s that have the same chapter.

Chapter 5: Flood Risk/Water Quality details the baseline flood risk and water quality of sensitive receptors on Destination Hillend. It then assesses the potential impacts that Destination Hillend could have on one of these receptors. Once these have been identified mitigation procedures are recommended for any significant potential effects that have been identified. Standard practice for an EIA will reference the legislation that pertains to potential effects. This flood management/water quality chapter references the flood risk management (Scotland) Act 2009 (FRMS Act), the Scottish Planning Policy (SPP), The Surface Water Management Flood Risk Guidance (The City of Edinburgh Council, April 2017) and The Water Environment (Controlled Activities) (Scotland) Regulations 2011. Standard practice in an EIA will also detail what resources and manuals were used. SWECO have cited Design Manual for Roads and Bridges Volume 11, Road Drainage and the Water Environment, The SUDS Manual and the SEPA’s Technical Flood Guidance for stakeholders. The Destination Hillend EIA has also complied with the 2017 EIA regulations which also outlines good practice guidance. The EIA for the Aberdeen Western Peripheral Route (AWPR) and the A77 Maybole Bypass EIA reference the exact same resources. This illustrates that these resources are key when creating an EIA.

When compared with other EIA’s it is apparent that destination Hillend was following standard procedure. Firstly, SWECO followed the government recommended environmental impact assessment process: screening, scoping, preparing an Environmental statement, making a planning application/consultation and decision making. Scoping is defining the issues that may arise in an EIA this can include asking the Planning authorities for its judgment. They provide a consultee list which includes organisations like SEPA, The Scottish Government and West Lothian Council. These organisations will submit their response in the scoping opinion document. Scoping is not a statutory requirement. However, comparing the destination Hillend EIA to the AWPR EIA both EIA’s include a scoping opinion, so this is common practice. In the Destination Hillend chapter Flood Risk/Water Quality a baseline survey was carried out. The baseline survey was performed with a desktop review and a site survey that focused on hydrology, water quality and flood risk. Information was collected from: Ordnance Survey mapping, British Geological Survey Mapping and aerial photography. The comparative EIA’s: the AWPR and the A77 Maybole Bypass also carried out a baseline survey where they followed the same procedure: a desk survey and a site survey. In the other EIA’s information was collected the same way utilising ordnance survey mapping, British Geological Survey Mapping and aerial photography. Studying the EIA’s, it is evident that providing detailed information on what water courses are nearby is important for these specific chapters. For example, the AWPR discusses the flood risk from the nearby river: the river Dee and the River Don. While Destination Hillend discusses the flood risk from the Lothian Burn. All three EIA’s also detail areas where they don’t have as much information. The destination Hillend EIA has an assumptions and limitations section where they outline potential constraints in their EIA. For example, SWECO notes that detailed topographic data of the site was not available and so they were not able to model hydraulic surface water runoff patterns. All of the other EIA’s (AWPR, and the A77 Maybole Bypass) have an assumptions and limitations section. The AWPR EIA mentions that the only hydrological data that was available were for the river Dee and the river Don. No other hydrometric data was available for any other water features. They make clear that other suitable methodologies have been applied to these water bodies but there is more uncertainty because there is not site-specific monitoring data. This exemplifies that discussing uncertainty is standard procedure in an EIA. It has been argued that more importance should be given to improving the communication of this uncertainty in EIA’s. (Tenney 2006) Other Sections that are similar throughout all the EIA’s are Mitigation/Enhancement methods and residual effects. The inclusion of these section is imperative because the Town and Country Planning Environmental Impact Assessment Regulations 2017 require that the local planning authority considers the proposed mitigation methods. (Environmental Impact Assessment Regulations 2017) The guidance on the preparation of the Environmental Impact Assessment Report published by the EU commission also states that an effective EIA with good qualities will show the significance of residual impacts for each environmental factor. (Lantieri 2017)

Throughout all the EIA’s in discussion they detail and critique the criteria for assessing water feature sensitivity by creating a table. Each table details surface water hydrology, water quality and whether the sensitivity is high, medium or low. A difference in this section between the AWPR EIA and the Destination Hillend EIA is that the AWPR EIA is much more detailed. This could be due to the nature of the development. As the AWPR is a road it will be experience more potential impacts from water because of the size of the development.

One of the overall goals of an EIA is to maximise sustainable development in a project. Similarly, when working correctly the EIA can aid in the design and development of a project while ensuring that the project will opt for the most environmentally friendly option. Nevertheless, when a survey was conducted on professionals who carried out EIA’s only 4% reported that an EIA had led to the most environmentally friendly option. (Thakur 2016) This highlights that when evaluating the EIA process, it is observable that some improvements can be made to ensure that the process addresses environmental sustainability more effectively. Globally these views are echoed with a UN study of EIA practice finding that several countries advocated for a change in the method. (Glasson 2012)

Often local bodies can provide the best insight into a future development. The Environmental Assessment Regulations 2017 require that the public are consulted after the environmental statement has been submitted. But they are not asked for input when creating the scoping and screening sections of the EIA. Both sections are important to the overall outcome of the EIA and if the public were involved it could potentially change the development drastically. When consultants were asked whether the EIA directive should be changed to require more public consultation during the construction of these sections 43% were in approval while 38% were opposed to it. (Baxter 2011) This demonstrates that the public should be more involved in the EIA process and that practitioners believe it could improve the results.

An EIA does not consider the cumulative effects that a development might create. The cumulative impact of developments could alter the surrounding environment negatively and in turn hurt how sustainable the project could be. It is thought that adding a cumulative impact assessment section to an EIA will improve its accuracy. Cumulative Impact Assessment can be defined as foreseeing and reviewing all other likely existing, past and reasonably foreseeable future effects on the environment arising from distresses which are time sensitive. (Glasson 2012) Actions like residential developments, farming and household behaviour all are not covered in a conventional EIA. Legislation in other countries have outlined the importance of cumulative effects. The California Environmental Quality Act (CEQA) states that significant impacts are considered to exist of the possible effects of a project are individually limited but cumulatively considerable (Glasson 2012). Assessing cumulative effects means you could analyse a development over an extended period and examine if it remains sustainable.

Other sections that organisations and consultants have voiced concerns over are climate change and socio-economic impacts. Scotland’s Environmental Impact Assessment Regulations 2017 states that a development needs a description of the likely significant effects of the development on the environment resulting from climate change; e.g the magnitude of greenhouse emissions. Yet, there are no dedicated chapters to climate change in any of the previously discussed EIA’s, Destination Hillend, The AWPR or the A77 Maybole Bypass. Climate change is such an important issue today that more guidance should be provided so developments can understand their full impact which will result in more informed decision making. Scotland’s National Planning Framework 2014 emphasized greatly that Scotland can flourish by increasing sustainable economic growth. (Mackay 2014) This can be done by examining the socio-economic factors in detail. In the past the EIA was created just to focus on how the development will affect the environment. Now it is imperative to also focus on how a development will affect a community. Research into this issue has accentuated that many EIA’s do not include any assessment of socio-economic impacts and that the scope of issues considered vary substantially. (Chadwick 2010) Additional issues that have been identified are that the aim is normally set on direct economic impacts of the development like how much money will be generated through jobs. There is less much needed focus on considerations such as socio-cultural aspects, local services and population. Changes in the demand for housing and services involving hospitals, schools and recreation centers could be explored. Improving the accuracy of the socio-economic section can come from clearly defining what it is and what points need to be addressed this can be challenging because it is difficult to quantify socio-economic issues. Addressing climate change and socio-economic changes is such an essential part of achieving sustainable development that more focus needs to be directed towards these divisions of an EIA. (Baxter 2011)

Getting accurate and quality data to use in an EIA can be difficult. Simply the number of assessments that need to be completed to approve a project means that sometimes important information can be lost or overlooked. A short list of other assessments that must be completed are: habitats regulation assessment, equality impact assessment, ecological impact assessment, water framework directive assessment and landscape assessment etc. Furthermore, predicting impacts generates a variety of conceptual and technical data problems. For instance, baseline data is often referred to in an EIA. This Environmental baseline is extremely hard to describe as the environmental baseline is constantly changing despite any development under consideration and so an environmental baseline will require a dynamic analysis opposed to a static analysis. (Glasson 2012) Less paperwork and more focus on the EIA process might result in better sustainable development.

The EIA can bring many beneficial outcomes to a development’s sustainability. The more successful an EIA is at outlining problems the more the development can achieve successful environmental sustainability. An effective EIA will not corrode natural resources and not exceed the boundaries of environmental limits. (Baxter 2011) An EIA can benefit the organisation carrying out the construction because it can provide a framework for examining design/location problems and environmental problems in tandem. It can also create a beneficial bond between the organisation creating the development and the organisation creating the EIA. An EIA can also save a company money in the long term because often EIA’s will reveal potential impacts that could be costly in the future. When flood risk is analysed it brings to light mitigation measures that will save the company money. Completing an EIA is inexpensive as well. Estimates of EIA cost is 0.5-2.0 percent of the project’s overall value. (Glasson 2012)

The EIA process is contributing to sustainable development because after the EIA is completed modifications are made towards sustainable development. EIA’s are implemented to identify a potential environmental problem. After the problem has been identified it is expected that this problem will be rectified. Evidence shows that in most cases changes are made. Modifications to a development as a result of the EIA process were required in more than half the cases, with most modifications deemed major. (Glasson 2012) The European Commission also reported in 2009 that EIAs led to improvements for most projects. A survey of environmental consultants found that over 60% of them thought that the EIA had produced some improvements in environmental protection for the site. (Glasson 2012)

In conclusion when addressing sustainable development, the EIA process is not perfect. It must be completed alongside other technical reports which means it cannot be impactful as designed and it can often not involve the public as much as it should. There are also some key sections that need to be included or improved sections like: cumulative effects, socio-economic impacts and climate change. On the other hand, the EIA does have strengths such as strengthening the relationship between organisations that will work on a development together. It could also save the development capital. Overall EIA’s seem to be effective because data has shown that changes towards environmental sustainability are made once an EIA has been submitted.

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