

# Cultural heritage

## Dealing with the cultural heritage aspect of environmental impact assessment in Europe

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*The Environment Assessment Directive of the European Union (EU) requires that the potential impacts on cultural heritage of proposed developments are examined. This paper considers how well cultural heritage is considered in environmental impact assessments (EIAs) within the EU by analysing the results of three studies that encompass an examination of an 'information processing' and an 'institutionalist' model for EIA. In combination, the studies provided evidence for inadequate consideration of cultural heritage. The three main issues are: cultural heritage is mainly restricted to built heritage in studies; there is a need for better guidance on how best to consider the implications of proposals on cultural heritage; and cultural heritage needs to be considered earlier in the process and should include greater public participation.*

Keywords: cultural heritage; EIA; guidance; practice; European Union

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TELLER AND BOND (2002) have demonstrated that 'cultural heritage' is a subjective concept, which, nevertheless, is recognised by the European institutions as being very important. They argue that developing a cultural identity for the European Union (EU) is suggested by Article 151 of the Treaty of Rome, but that, at the same time, preserving cultural identities (through cultural heritage) of individual member states is important and requires a degree of subsidiarity and a degree of consistency to be applied. In this respect, the Environmental Assessment Directive is an ideal vehicle as it obliges member states to meet objectives, but does not constrain methods.

This paper aims to analyse the extent to which cultural heritage is being considered in environmental assessments prepared in the EU for proposed development projects (it does not investigate the consideration of cultural heritage in environmental assessments of plans and programmes as required by the recent Strategic Environmental Assessment Directive (European Parliament and the CEU, 2001)).

Environmental impact assessment (EIA) requires the consideration of many impacts. In Europe, the Environmental Assessment Directive, as amended, requires the consideration of "human beings; fauna and flora; soil; water; air; climate; the landscape; material assets; cultural heritage" (CEU, 1997). Research to-date has illustrated that, at least for project-level EIA, not all these impact categories are comprehensively dealt with, as a rule, in environmental impact statements (EISs). Indeed, there is great variation in the detail attributed to different impact categories in EISs in the UK (Russell, 1993; Sims,

1993) with socio-economic impacts one of those categories found wanting by researchers (Glasson and Heaney, 1993; Chadwick, 2002). The assessment of quality in EISs has received a great deal of attention in academic circles (for example, Lee and Colley, 1990; Lee *et al.*, 1994; Glasson *et al.*, 1996) and, whilst review packages exist to help in the review of quality (Lee *et al.*, 1999; Environmental Resources Management, 2001a; Institute of Environmental Management and Assessment, 2001), these primarily assist with procedural review rather than substantive review of particular impact categories.

The requirement to investigate cultural heritage in the Directive dealing with environmental assessment is particularly important because it and the SEA Directive are the only pieces of European legislation that actually refer to cultural heritage (Teller and Bond, 2002, page 612). From the point of view of those interested in preserving cultural heritage, the Directives provide a potential tool. However, there is a concern that, at present, the consideration of cultural heritage in EIA, like socio-economic impacts, is less than satisfactory. The parallels are easy to see — both types of assessment rely, up to a point, on perceptions of the public, and this is an area that is traditionally weak in EIA despite guidance on good practice.

The specific provisions of Council Directive 85/337/EEC (CEC, 1985) as amended by Directive 97/11/EC (CEU, 1997) for the consideration of cultural heritage are detailed below, as are the key points from the European Commission guidance produced to help member states with the implementation of the Directive. This sets the baseline for the degree it might reasonably be expected that cultural heritage is considered. This will be followed by an explanation of the research approach taken, the results obtained, and then the conclusions that can be reached.

## EA Directive and related guidance

The Directive contains provisions related to cultural heritage in one of its articles and in the advice given in Annexes III and IV. Article 3 requires that the environmental impact assessment “shall identify, describe and assess ... the direct effects of a project” on a number of factors, one of which is “the cultural heritage”.

Annex III sets out selection criteria to be used when a screening decision has to be made to determine whether a project should require environmental impact assessment. Paragraph 2 of this Annex refers to the location of the project and requires that the “the environmental sensitivity of geographical areas likely to be affected by projects must be considered, having regard, in particular, to: ... the absorption capacity of the natural environment”; in having regard to absorption capacity, “particular attention” has to be paid to a number of factors, one of which is “landscapes of historical, cultural or archaeological significance”.

Annex IV sets out information that should be presented in an environmental impact statement (subject to some caveats set out in Article 5 (1)). Specifically, it requires that the statement contain a description of “the architectural and archaeological heritage ...”.

There are three guidance documents published by the European Commission, all of which refer to cultural heritage to some degree (Environmental Resources Management, 2001a; 2001b; 2001c). Of note is the guidance on EIS review (Environmental Resources Management, 2001a), which asks in its Section 3.12:

“Are any locations or features of archaeological or other community or cultural importance that may be bisected [by] the Project described, including any designated or protected sites?”

Of particular importance here is the fact that reference is to locations or features of cultural importance but that these are clearly not defined solely as being designated sites. We can infer from this that identification of designated sites is not sufficient on its own to identify all areas of cultural value.

The guidance on screening (Environmental Resources Management, 2001c) also provides guidelines on organisations and individuals that the competent authorities may find it useful to consult or seek advice from during case-by-case screening. Section B3.4.3 on consultations during case-by-case screening suggests that “authorities with a statutory responsibility for environmental matters (for instance, pollution control, nature protection, cultural heritage, water, waste etc)” should be consulted for advice by the competent authorities.

A checklist is provided in the guidance on scoping (Environmental Resources Management, 2001b), the second part of which deals with the characteristics of the project environment and provides a series of questions requiring consideration at the scoping phase for different project locations including “[a]reas which are protected under international or national or local legislation for their ecological, landscape, cultural or other value ...” and “[a]reas or features of historic or cultural importance”. A number of questions are directly relevant to cultural heritage and clearly expect more than reference simply to designated buildings, for example:

“Is the project likely to affect human or community health or welfare? — including facets, such as, cultural identity and associations, community cohesion and identity, and social institutions.”

The Consultations Checklist also provides details of the organisations and individuals that it may be appropriate to consult during the scoping procedure and this includes “authorities responsible for the protection of nature, cultural heritage and the landscape”.

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**Cultural heritage has to be considered throughout the EIA process and relevant expertise must be consulted: cultural heritage issues are integral to the whole procedure and require proper consideration and assessment in conjunction with the more tangible facets of the environment**

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As can clearly be seen from the Directive and guidance documents, there is a requirement for cultural heritage to be considered throughout the EIA process and for relevant expertise to be consulted. Cultural heritage issues are in fact integral to the whole procedure and require proper consideration and assessment in conjunction with the more tangible facets of the environment.

### **Methodology**

In order to examine the degree to which cultural heritage is being considered in environmental assessments, it is important to clarify which model of EIA is being considered. (Bartlett and Kurian, 1999) identify six different models, each with its own separate goals for the process, varying from the 'information processing' model, whereby EIA is considered to present rational and logical information to aid decision-making, through to the 'institutionalist' model, whereby EIA transforms the values and perspectives of key individuals within institutions thereby achieving its goals. The other models present, to some extent, a continuum between these models. To focus on just one model might produce useful results, but with limited validity to others, although it is clear that researchers have generally focused on the information processing model (Weston, 2000) and have frequently reviewed effectiveness of EIA based on the contents of the EIS produced rather than on its effect or influence on any decision.

The approach taken tries to reach conclusions based on a consideration of both the information processing model and the institutionalist model with the hope of them being more generally applicable. This requires more than one method to be used and necessarily dilutes the resource available for the task.

First, based on the information processing model, the question asked is: if and when are cultural heritage issues currently considered in planning? This model seeks to identify factual information about the current situation and a questionnaire survey is accepted as an appropriate methodology to address this question (May, 2001). Thus, a questionnaire survey was

carried out with the aim of examining the difference between theory (as set out in the EIA Directive) and practice in individual member states of the EU. This survey was carried out on two target groups: EIA specialists and cultural heritage specialists. This study was supplemented by a review of literature sources relevant to EIA legislation in EU member states, including official government web sites.

Such a study can provide a broad overview of coverage of cultural heritage, but is based on viewpoints of respondents with differing cultural backgrounds and perspective. Thus a detailed examination of EISs submitted in just one country (Scotland, with the choice of study being made purely on pragmatic grounds — the availability of a researcher) was carried out to determine their level of coverage of cultural heritage against an objective baseline of review criteria. This approach has been successfully applied for similar aims, for example, to determine: the level of coverage of cumulative effects in EIA (Burris and Canter, 1997; Cooper and Canter, 1997; Cooper and Sheate, 2002); the potential for EIA as a sustainable development instrument (George, 1999); the coverage of socio-economic impacts in EIA (Glasson and Heaney, 1993; Chadwick, 2002); and the coverage of health impacts in EIA (Russell and Gallagher, 1997; BMA, 1998).

Secondly, based on the institutionalist model, the question being asked is: how has cultural heritage been considered during the EIA process and why was it considered in that way? This seeks to understand current processes and to learn from them, thus, the objective is best achieved using case-study analysis (Yin, 1994). The case-study approach has been successfully applied to examine the effectiveness of public participation in EIA (Palerm, 1999a; 1999b; Del Furia and Wallace-Jones, 2000), to detail the level of social impact reporting (Nottingham, 1990), and to clarify the requirements for consideration of cumulative effects (Ross, 1998).

Wood (2003) cites Bartlett and Baber (1989) to illustrate the difficulties of examining the effects of EIA on decision making and to recommend an examination of attitudes and opinions of decision makers, in his case through the use of interviews, as the most appropriate research method for a comparative study of EIA systems (Wood, 2003, page 15). Thus, this study involved the selection of some EIA projects (case studies) for more detailed analysis, specifically involving stakeholder interviews. Again, with limited resources, the research is limited to just one country (Sweden) with the selection being made on the pragmatic basis of researcher availability.

### **Current practice in EU member states**

Information relating to actual practice within the member states was gained by means of two questionnaires and a review of literature based on up-to-date research (for example, Bjarnadóttir, 2001;

Cassiopee *et al*, 2001). The first questionnaire was sent to a selection of 131 EIA practitioners and ‘experts’ representing every member state; this aimed to both provide up-to-date details of current legislation within each member state and to seek opinion as to how well cultural heritage considerations were served by this legislation in the practical situation. Potential respondents were identified by reference to the EIA Trainers Network (EIA Centre, 1996), to the list of EIA experts and centres maintained by DG Environment of the European Commission (<http://europa.eu.int/comm/environment/eia/contacts3.htm>), and to the IAIA (International Association for Impact Assessment) member’s database by using a search by country (<http://www.iaia.org>).

The second questionnaire was sent to 26 experts from eight member states within the field of cultural heritage, planners and local authority personnel; this also sought to identify actual practice and any shortcomings or apparent failings in the systems currently in place. Potential respondents were identified by contacting heritage organisations and using a snowball technique to identify further contacts from these, and by searching the IAIA member’s database for those with skills in ‘planning’ and ‘urban issues’.

As is typical of questionnaire surveys, the response rate was poor with 17 responses obtained for questionnaire 1 covering ten of the 15 member states, and just four responses to questionnaire 2 covering Belgium and the UK. Thus, the literature survey was essential in filling many (but not all) gaps. Table 1 provides a subjective assessment by

the authors of the coverage of information available to them through this research across the EU. The following discussion needs to take into account the gaps in knowledge indicated by this table.

The study is necessarily subjective and is far from comprehensive in terms of seeking responses from all the potential stakeholders in each member state; indeed to do so would be an enormous undertaking. Thus the information obtained relies on the (informed) perceptions of a limited number of respondents. So, to illustrate the differing practice within the member states, some key points made by the respondents to the questionnaire will be outlined, followed by an indication of the tentative conclusions that can be drawn from the study.

Few of the respondents considered that cultural heritage issues were given adequate regard at the screening phase of the EIA process. In theory, cultural heritage issues are taken into account at the scoping stage of the EIA process in the majority of the member states. However, in practice, formal guidelines often do not exist, for example, in Portugal and Finland, or, if they do, they focus on the built environment and ‘material assets’, as in the UK and Ireland.

In practice, few respondents felt that cultural heritage was addressed at this stage, or, if it was, the range of issues considered was too narrow. This point applied not only to scoping, but to the EIA in general, with respondents from many countries commenting that, in practice, the consideration of cultural heritage issues is limited to built, primarily archaeological and architectural, heritage. However, some respondents felt that even the consideration of built culture could at times be limited, as there were no proper guidelines on how and what to assess.

A specific problem raised was that a great deal of development in urban areas tended to be small-scale housing developments that are EIA-exempt in some countries (for example, Portugal). Thus, developments with potential effects on cultural heritage are exempted from the need to examine the significance of the potential impacts.

In the majority of cases it is the local authority that approves consent for development applications. In the absence in the majority of countries of clear guidelines on how cultural heritage should be taken into account during the EIA process, this will probably result in variations in the importance given to these issues from region to region. A possible advantage of the decisions occurring locally would be that the local authorities would be more aware of, and amenable to, local concerns and cultural issues.

It is in the area of public participation that the greatest discrepancies among countries occur. In many of the member states, the public notification and participation procedures are more directly linked to the planning process than to the EIA alone, but they vary from the minimum required by the EIA Directive of notification at key stages, as in Ireland, to mandatory public inquiries, as occur in Italy and

**Table 1. Coverage of information across EU member states from questionnaire responses and literature reviews**

Country	Information on EIA legislation	Information on EIA in relation to cultural heritage
Austria	✓	✓
Belgium	✓	P
Denmark	✓	✓
Finland	✓	✓
France	✓	x
Germany	✓	✓
Greece	✓	x
Ireland	✓	✓
Italy	✓	x
Luxembourg	✓	x
Portugal	✓	✓
Spain	✓	x
Sweden	✓	✓
The Netherlands	✓	✓
United Kingdom	✓	✓

Key: ✓ = detailed coverage from at least one source  
 x = no coverage  
 P = partial coverage

The Netherlands. The levels and timing of participation as well as the amount of credence given to contributions from the public obviously affect the impact the public can make in relation to issues of cultural heritage, and, in countries where participation is actively sought and encouraged, such as Finland, the general population has far more potential to have their concerns recognised and taken into account.

The right of appeal against development consent decisions also varies greatly, with the minimum being, as is the case in the UK, that the developer only has the right. Examples of practice at the other end of the spectrum are varied. In Finland, the right of appeal has recently been extended to associations and foundations that promote the protection of the environment, health, nature or that improve the living environment. In Styria, Austria, the system allows municipalities, the ombudsman for the environment and citizens groups the right of appeal; however, the citizens group must have a minimum of 200 signatures to qualify. In the Danish system, in addition to the Minister for Environment and Energy, anyone with a legal interest may appeal, whilst in Ireland, anyone who made submissions or observations in writing in relation to the application may appeal.

Three common themes developed throughout the responses regardless of professional background or nationality of the respondent. First, respondents felt that only built heritage was ever taken into account, and that even this was often poorly served. The non-tangible aspects of culture, such as cultural identity, language and community cohesion were, it was felt, ignored.

The second issue commonly raised was that of a general lack of assessment techniques and guidelines relating to cultural heritage. Many respondents considered that, for these issues to be properly addressed within the EIA process, guidelines on what to assess and the development of techniques to ease and formalise the assessment process were needed.

Thirdly, many respondents considered that the aspects of cultural heritage needed to be addressed earlier in the process, with greater public participation (and for this participation to be treated seriously) and information gathering on cultural value to

prevent the issue being 'side-stepped' throughout the procedure, and that a wide range of stakeholders should be consulted to reflect cultural heritage concerns in urban developments, including: community groups; local councils, art and heritage units; local historical and arts societies; and architectural heritage groups. Cultural heritage was viewed by many of the respondents as the property of everyone and that, as such, the participation process should be without restrictions.

### Cultural heritage coverage in EISs: Scotland

To look in more detail at the coverage of cultural heritage in EIAs, an attempt was made to establish the quality of EISs prepared in Scotland with regard to their determination of significance in relation to cultural heritage impacts. The research adopted criteria for significance based on the key requirements for good practice principles for determining impact significance recommended by the International Study of the Effectiveness of Environmental Assessment (Sadler, 1996, page 121). These key requirements are:

1. "use a systematic approach in which the choice of method is clearly related to the problem at hand and, as far as possible, can be widely understood;
2. apply criteria that allow the attribution of significance in a rational, defensible and problem-relevant way;
3. identify the basis on which judgements are made;
4. distinguish between the ecological and social importance of impacts;
5. describe as necessary, the confidence levels in impact prediction and judgement that underlie the attribution of significance; and
6. provide a straightforward, non-technical explanation of approach (including assumptions and qualifications) when more complex methodologies are used."

To these was added the following criterion based on text from the same page of the Effectiveness Study:

7. "recognise that the evaluation of significance is subjective, contingent upon values, and dependent upon the environmental and community context".

Evaluation against these criteria was made on a rating scale based broadly on that used in the International Study of the Effectiveness of Environmental Assessment (Sadler, 1996, page 61) as follows:

- A. "excellent (all criteria met);
- B. good (sufficient information to establish and identify significance, with bases of

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**There were three common themes in the responses: only built heritage was ever taken into account; the lack of assessment techniques and guidelines relating to cultural heritage; and aspects of cultural heritage needed to be addressed earlier, with greater public participation**

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- judgement identified, however, not all criteria met);
- C. satisfactory (identification of significant impact possible, however, some omissions);
- D. poor (insufficient information relating to how significance was established);
- E. very poor (significance not established)".

Twenty five EISs were selected; this probably represents 12% of those submitted in Scotland during the study period of 1997 to 2001 (the actual number is not accurately known). Initially, 25 EISs were requested from the Scottish Executive which holds a central repository, but only seven of these contained information on cultural heritage impacts. Eight more EISs including information on cultural heritage were selected from Strathclyde University and a further ten from a collection held by the West of Scotland Archaeological Service (in this collection by virtue of the fact that the Service had been asked to comment on the cultural heritage component of the EISs). Of the 25, ten were submitted under the regulations implementing Directive 85/337/EEC and 15 under those implementing the Directive as amended by Directive 97/11/EC.

Clearly, then, the selection is far from random and has already excluded EISs that do not contain information on cultural heritage (it is not known whether this lack of information is because of lack of potential impact or lack of consideration of potential impact). As such, the study looks at the quality of consideration of significance related to cultural heritage impacts in a subset of EISs where there has been some consideration.

Each of the EISs was reviewed by just one person. Whilst this is rarely recommended when conducting such a review because of the increased risk of missing key points or of introducing bias (see Lee *et al*, 1999), it does facilitate some consistency and has been used successfully (see, for example, McGrath and Bond, 1997).

It was found that one of the EISs (4%) obtained a quality rating of A, three (12%) a rating of B, ten (40%) a rating of C, seven (28%) a rating of D and four (16%) a rating of E. A separate analysis was carried out related to the individual criteria to find out where the strengths and weaknesses were in terms of consideration of significance. This was done simply by examining the performance of the EISs against the criteria as indicated in Table 2.

Further analysis examined the relationship between length of EIS and quality of coverage of cultural heritage issues. Previous researchers have found a linear relationship between length and quality (for example, Lee and Brown, 1992; Sims, 1993; McMahan, 1996) and a length scale derived from the Department of the Environment Planning Research Programme (1996) was used, as illustrated in Table 3 in which "massive" equates to approximately 300 pages or more. It was found that longer EISs are, on the whole, of better quality than shorter ones.

Table 2. Performance against individual criteria

Criterion	Number of EISs	Percentage of EISs
1	11	44.6
2	11	44.6
3	15	60.6
4	8	32.6
5	1	4.6
6	2	8.6
7	1	4.6

Thus, there is evidence that the consideration of cultural heritage in EIA is poor, at least in Scotland, although the approach used is novel and has no comparisons for other types of impacts, nor does it have a previous baseline. In addition, the selection of EISs from the library of an organization with expertise, present in that library by virtue of their having been consulted, can be criticised. This, potentially, is more likely to exaggerate the level of consideration of cultural heritage if extrapolated than undervalue it, but nevertheless indicates flaws in the EIS selection procedure. In addition, though based on transparent criteria, the categorisation of EISs is clearly subjective.

### Cultural heritage coverage in EISs: Sweden

A limited multiple-case study was carried out to identify the need for increased knowledge of cultural heritage amongst the stakeholders in the Swedish EIA process. The main aim was to gain a greater understanding of the stakeholders' competence and treatment of the these issues in EIA. The study was part of the basis for an educational programme carried out by the Swedish National Heritage Board, aiming to increase the competence of cultural heritage in the EIA process. Prior to the study, a Nordic project had been carried out on account of the inconsistency amongst the Nordic EIA processes. This resulted in a booklet containing a description of a methodology for defining cultural environment issues in EIA (Nordiska Ministerrådet, 2000).

Table 3. Evaluation in relation to length of EIS

Rating	0-49	50-99	100-149	≥150	massive
A					1
B		1		1	1
C		1	6	1	2
D		3	3	1	
E	1		3		

The methodology for the study was an explorative, multiple-case study (Stake, 1995). Since time was limited it was considered more appropriate to analyse in detail a small number of cases rather than carrying out a large, less detailed survey. Therefore, only seven EISs were chosen for investigation, using examples where cultural heritage had been of immediate importance. The selection was made with the aim of covering two project types in which cultural heritage is often an issue: infrastructure projects (two EISs) and wind-farm projects (five EISs).

The study was made in parallel with a less detailed survey by a consultancy company investigating the treatment of cultural heritage in EIA in all the County Administration Boards of Sweden. (The aim of that study was to look into the organisation of the County Administration Boards and obtain a picture of their different experts' involvement in the EIA process. The result was that the organisations differ widely from county to county and that the cultural experts are often not involved or, where they are, do not feel that their views are considered as being important.)

The case study involved two steps. Initially, the selected EISs were reviewed to assess the consideration of cultural heritage and to identify the important stakeholders in the process. Thus, not only were the impact assessment documents reviewed, but also any related document, such as meeting records and baseline materials concerning the cultural heritage. No formal review package was used, but three simple criteria were established that asked: whether the cultural landscape was described and to what extent; whether the project's impacts on the cultural landscape were described; and whether there was any attempt to predict the consequences of these effects. The extent to which the project had been changed in order to minimise the negative effects on the cultural landscape was also taken into account.

The review and the identification of the important stakeholders was followed by interviews with them using a qualitative, in-depth interviewing technique (Kvale, 1993). The main stakeholders identified were officials of the County Administration Boards, officials of the communities, the consultants involved and, for the road building projects, the Swedish National Road Administration. Through the interviews the stakeholders' apprehensions of the cultural values and the role of these in the EIA process were clarified. The chosen methodology makes the study inevitably subjective, but in a study with the aim of identifying the possible lack of competence in integrating cultural heritage in the EIA process, this could hardly be avoided.

According to the Swedish environmental legislation (mainly The Environmental Code (Miljöbalk, 1998)), as well as the EU Council Directives 85/337/EEC and 97/11/EC (CEC, 1985; CEU, 1997), impacts on the landscape and cultural environment should be taken into account in an EIA. Since the County Administration Board is the authority

responsible for reviewing and approving EISs such as those reviewed in the study, the experts within the cultural field there have an important role in guarding the integration of the cultural heritage in EIA.

In the study these experts all agreed that the cultural heritage is often very poorly assessed in EISs in general and that the cases used in the study were no exceptions. In the reviewed EISs, the cultural values considered were mainly cultural remains and protected areas with cultural values. The cultural landscape as a whole was hardly mentioned at all, in any of the documents. Since the chosen EIAs concerned cultural heritage in particular, they should not be assumed to represent an underestimation of the situation in EIAs in general. This limited study thus suggests that there is a need for better integration of cultural heritage in the EIAs undertaken in Sweden.

The case studies show the need for having access to good baseline material in the EIA process. In most cases, the material concerning cultural heritage only represents cultural remains and protected areas. This makes it hard for the author of the EIS to represent cultural values of the landscape as a whole unless he or she has a special competence within the field, which was not the case in any of the reviewed EISs in the study.

In Sweden, the County Administration Board has a responsibility to distribute much of the baseline material existing concerning cultural heritage. Thus it also has the responsibility to maintain its quality. Interviews with both the authors of the EISs and the officials of the cultural section of the County Administration Board show that the baseline material is not formulated in a way that makes it easy to use for a person without considerable knowledge of cultural heritage issues. The user of the baseline material gets no guidance at all in identifying the values of the cultural landscape as a whole.

Poor treatment of cultural values can also be explained by the way in which the EIA process is accomplished. The screening and scoping phases were explained in the interviews as being the most important time for integrating cultural values into EIA (see also Teller and Bond, 2002). Unless they are taken into account then, they have in reality no opportunity to affect the process to any significant degree.

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**The screening and scoping phases were explained in the interviews as being the most important time for integrating cultural values into EIA, otherwise they have in reality no opportunity to affect the process to any significant degree**

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The stakeholders responsible for the cultural heritage component of the EIA process are the experts within the cultural field at the County Administration Board. From their point of view, they are often involved too late in the process and have trouble making themselves heard. On the other hand, the interviews also show that there can be a problem in assessing the consequences for cultural heritage at a very early stage, since the designs of the planned project are too vague. So it is not enough to involve experts early in the process, but they must be active participants from the early stages through the whole process.

Another reason for poor consideration of cultural heritage is the lack of attention to its integration in planning at the strategic level (compare with Teller and Bond, 2002). In the study, this proved to be a problem mainly for the infrastructure projects, which were both initiated as a result of a regional strategic infrastructure plan. The purpose of such a plan is to prioritise infrastructure projects in a region based on the identified needs. At this strategic level, the cultural impacts are not taken into account and therefore there is no possibility to take the cultural values as a starting point in infrastructure projects. This is also the case for infrastructure plans for which a strategic environmental assessment has been carried out.

For the wind-farm projects, there has been an effort in some communities to plan the locations at the strategic level, in a comprehensive plan for the expansion of wind farms in the municipality. This comprehensive plan though, focuses on the visual aspects rather than cultural heritage and has been developed too late in the sense that it has not preceded the expansion of wind farms, but rather been developed parallel to it. For these reasons, the comprehensive plans cannot be considered as integrating cultural heritage values at the strategic level.

Another problem identified in the study is that the County Administration Board has a double role in certain EIA processes. For those at the municipality level, the Board acts as a higher court, which in a way prevents it from having active participation in the process: if it were to, there would be a risk that it might be too much involved in the case to act as a court. In such cases, competence in the field of cultural heritage available at the County Administration Board cannot be used to benefit the EIA process.

The conclusion of the study is that there is a need for broader involvement in EIA and greater competence to cope with cultural heritage in the process. There is a lack of knowledge of cultural values amongst the authors of EISs that perpetuates this problem. There is also a lack of knowledge of the EIA process and of good EIA practice amongst the cultural experts; this hinders them from arguing for a better treatment of cultural heritage in EIA. A problem connected with this is that the cultural experts have trouble in formulating the cultural values and

in making them explicit. A development of the communication of the cultural values and the means of collaboration among the stakeholders is therefore urgent in order to make better use of the accumulated competence in the process.

## Conclusions

Research has demonstrated a commitment at policy level within Europe for the protection of cultural heritage (Teller and Bond, 2002). It has indicated that the use of the EU Environmental Assessment Directive to achieve this goal is one way of solving the paradox that the Union wishes to develop its own cultural identity whilst, at the same time, cultural heritage is usually defined at a local level. However, the results detailed in this paper indicate that the consideration of cultural heritage within EIAs is far from good at present and is some way from being consistent.

The research outlined here has tried to investigate the consideration of cultural heritage within EIA using both an information processing model (comprising literature review, questionnaire survey and criteria-based review of EISs) and an institutionalist model (using stakeholder interviews). The questionnaire survey sacrificed detail in an effort to identify common themes across the EU; the criteria-based review and stakeholder interviews are restricted to individual countries; conclusions general to the EU cannot be drawn from them as they each have their flaws in terms of sample size and/or subjectivity of analysis.

However, when considered together, the cumulative evidence is far more compelling and it seems a reasonable conclusion that: the focus of effort in EIAs is on tangible cultural heritage rather than on more intangible facets of cultural heritage (such as cultural identity); there is a dearth of useful guidance; and consideration of cultural heritage starts too late in the EIA process and does not involve members of the public sufficiently. The fact that research using two separate models for EIA, each with different goals, has reached similar conclusions increases confidence.

A recurring theme is thus the lack of, and need for, suitable guidance on how to take cultural heritage into account within EIA. Existing EU guidance is helpful, but is general in nature and deals mainly with principles rather than approaches. Studies are currently being financed by the European Commission which should go some way to providing the necessary techniques. One of these, SUIIT (Sustainable development of Urban historical areas through an active Integration with Towns, <http://www.lemma.ulg.ac.be/research/SUIIT/>) aims to establish a flexible and consistent environmental assessment methodology to assist with the active conservation of historical areas and should go some way towards addressing the existing methodology gap.



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