



Critical Evaluation of Skyline Swansea Environmental Statement



Foyajul Karim Rimon

University of Wales, Trinity Saint David

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This report discusses the quality of Skyline Swansea Environmental Statement (ES) in terms of Lee and Colley (1992) framework. The ES can accommodate large scale leisure proposal on Kilvey Hill comprising of 1,352m gondola, luge, zipline, Sky Swing and mountain bike trails on 40.56ha of sensitive urban hillside. Excellent Landscape/Visual assessment (A grade, Ch7 GLVIA3 matrices), full masterplan specification (Ch5 Figure 2), and compliance with the EIA Regulations 2017 are some of the strengths. The most critical weaknesses are superficial alternatives analysis (Category C: D grade, do-nothing only), no cumulative effects (Ch3: C grade, no interaction matrices), and no responsiveness to stakeholders in spite of 86% PAC opposition (Category K failure). The Site of Importance for Nature Conservation (SINC) habitats on Kilvey Hill are broken up permanently and irreversibly by gondola, luge, and trail development infrastructure to the disadvantage of the bats, reptiles, and birds despite so called net improvements in biodiversity. Theory practice gaps weaken EIA preventative, participative, and integrative functions, cumulative assessment lacks in planning, traffic/noise concerns receive a sham analysis, economic benefits are reaped at the expense of biodiversity. Sustainability conflict favors equity gain of lawful access and non-authenticated ecological restoration. It is written that there should be a recommendation of mandatory 5-year monitoring (PRow surveys, vegetation quadrats, bat transects), PAC response annex, and quantitative rebuttal, cumulative interaction matrices.

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1. Introduction

The report discusses in detail the Skyline Swansea Environmental Statement (ES) with regard to a large scale leisure development on Kilvey Hill and the Landore Park and Ride in Swansea. Environmental Impact Assessment (EIA) is one of the most important tools of sustainable development that enable planners to take into account the environmental impact before decision making (Glasson et al., 2012).

1.1 EIA Purpose and Academic Importance

It is a methodological process of decision support, which is used to determine the probable environmental impacts of proposed developments before consent, and thus enable informed and transparent decision making (Glasson et al., 2012).

The key point of this process is the development of a strong Environmental Statement (ES), the basis of which is likely to be the availability of exhaustive baseline data, transparent impact prediction tools, the analysis of viable alternatives, and well-formulated mitigation strategies. Nevertheless, comprehensive studies have revealed that the performance of EIA is not associated with the accomplishment of the procedure but rather with the quality of the ES itself (Wood, 2003).

Empirical research also shows that better ESs have higher chances to result in such changes in designs, extra mitigation, and better environmental results (Morgan, 2022).

Based on this literature, it is built in the following table 1 that summarizes the main quality standards applied to assess the effectiveness of ES. It will also points out the most recurrent drawbacks to the EIA practice.

Table 1: Essential ES Quality Criteria and Research Findings

Quality Criterion	Best Practice Requirement	Common Deficiencies	Academic Evidence
Project Description	Complete technical specifications	Vague or incomplete details	Wood (2003): 35% inadequate
Baseline Environment	Comprehensive current conditions	Selective or outdated data	Morgan (2022): temporal gaps
Impact Prediction	Transparent methodologies	Hidden assumptions	Pölonen (2021): 42% opaque
Alternatives Analysis	Reasonable options compared	"Do-nothing" only	Bond (2020): 61% superficial
Communication Quality	Accessible to non-experts	Technical jargon dominates	Arts (2023): NTS failures

1.2 Skyline Swansea Development Context

The report evaluates the Skyline Swansea Environmental Statement (ES) to justify a proposed leisure development that is large-scale and to be located at Kilvey hill and Landore Park and ride in Swansea. It would cover around 40.56 hectares of land which would be developed in an area that is recreational, of landscape nature, and ecological sensitive.

In March 2025 the Skyline proposal was submitted back by Swansea Planning Committee. Its development includes an eight seat detachable gondola ranging in capacity of up to 820 passengers an hour, four seat chair lift that serves two luge courses, zipline, 50 meter sky swing, graded mountain bike trails and a multi hold visitor block that includes food hall and rooftop seating. Other related works are ground profiling, sustainable drainage systems (SuDS), planting, and amendments to local highways. The ES should show how possible impacts on landscape character, accessibility to the population and ecological receptors are identified, appraised and remedied appropriately. Table 2 summarizes the relevant development sensitivity factors to the Skyline proposal.

Table 2: Skyline Development Sensitivity Factors

Environmental Factor	Site Characteristics	EIA Challenge	ES Focus
Landscape/ Visual	Elevated urban hillside, sky lining risk	Landscape and Visual Impact	Chapter-7 (core)
Recreation Access	Extensive network	User experience prediction	Chapter-4 baseline
Stakeholder Opposition	High PAC objection volume	Consultation responsiveness	Category K review
Tourism Justification	Economic claims regeneration	Sustainability balance	Chapter-6 policy

2. Legislative and Policy Framework

2.1 International Foundations of EIA

The International concept of sustainability is the cause of Environmental Impact Assessment (EIA), with the United States National Environmental Policy Act (NEPA, 1969) the first formal requirement of EIA in the world. International reinforcement was through Principle 17 of Rio Declaration (1992), which required EIA of activities that have a probable negative substantial impact (United Nations, 1992). This section will be contrasting the project with the globally accepted principles of EIA which is summarized in Table 3.

Table 3: International EIA Principles for Skyline Relevance

Principle	Source	Requirement	Skyline ES Test
Precaution	Rio 17	Assess effects early	Ch-cumulatives
Alternatives	NEPA/Rio	Reasonable evaluation options	Ch-5 do-nothing only
Equity	Sustainable Development	Future generations protection	Monitoring absence?

Table 3 reveals that EIA is not only a report exercise; it is a decision-making, preemptive tool that indicates significant environmental risks at the initial stage. The precautionary principle is particularly concerned with comprehensive cumulative and ecological evaluations, which is courtesy of the sensitivity of Kilvey hill with Skyline.

2.2 UK and Welsh Legislative Framework

The Skyline Environmental Statement must demonstrate in the present day legislative context that it satisfies the requirements of the info set out in Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. Those legal requirements are direct outlines of the EU EIA Directive, and stipulate the minimum content and scope of Environmental Statements of Schedule 1 and Schedule 2 developments. Therefore, Table 4 aligns the corresponding requirement of Schedule 4 with the corresponding chapters of Skyline ES.

Table 4: EIA Regulations 2017 Schedule Skyline Compliance

Requirement	Reg Para	ES Location	Review Focus
Project description	4(a)	Ch5	Category A completeness
Alternatives	4(b)	Ch5	Category C depth
Baseline	4(c)	Ch4	Category D adequacy
Impacts	4(e)	Ch3	Categories E/K
Mitigation	4(f)	Ch7	Category F hierarchy

Table 4 is an information requirement map of Schedule 4 of the Town and Country Planning (EIA) (Wales) Regulations 2017 against the corresponding chapters of the Skyline ES.

2.3 Policy Intentions and Sustainability Objectives

Environmental Impact Assessment is integrated into the Welsh sustainable development policy (Planning Policy Wales (PPW) Edition 11 (2021): it is necessary to achieve an adequate balance between environmental protection, economic development, and social well-being (PPW SS6.3). On a strategic level, Future Wales 2040 gives more focus on tourism-led regeneration and at the same time aims at protecting landscapes that are considered valuable (Policy 19). Various Technical Advice Notes (TANs) such as TAN16 (sport and recreation), TAN5 (nature conservation) and TAN12 (design) also contribute to this policy direction. Nevertheless, there is always a more or less conflict between policy ambition and practices because EIA is conspicuously applied to guide development as opposed to constitutively limit it (Jay et al., 2007).

3. Methodology for EIA Review

3.1 Aim and Scope of the Review

This is a systematic methodology which is used to assess the quality of Skyline Swansea Environmental Statement (ES). This emphasis is consistent with the scholarly view of the quality of decision making, the understanding of stakeholders, and the confidence of the population in the procedures of planning being directly improved by the excellence of ES documentation (Morgan, 2022).

3.2 Lee & Colley Framework Selection and Structure

Since 1987, this critique of the UK EIA quality assessment benchmark is anchored on the Lee and Colley (1992) Review Package. It was created by dissecting the performance on four review areas, 13 categories (A-M), and 53 criteria, rated A (excellent) to F (deficient) through coverage (40 percent), quality/depth (40 percent), guidance utility (20 percent). The benchmarking that was set by Wood (1995) in the UK revealed average B-C grade (51 percent satisfactory) which can be found in the table 5 below.

Table 5: Lee & Colley Framework Structure Skyline ES Application

Review Area	Categories	Core Criteria	Skyline ES Examples
Development Context	A (Project), B (Wastes), C (Alternatives), D (Baseline)	Completeness, specificity,	Ch-5 Masterplan Ch4 LANDMAP
Impacts Evaluation	E (Magnitude), F (Mitigation), G (Residuals)	Prediction methods, significance criteria	Ch-7 GLVIA3
Presentation	I (Text), J (Graphics), K (Conclusions), L (References), M (Impression)	Clarity, accessibility, synthesis	Vol1 NTS; photomontages
Procedural	Cross-cutting	EIA Regs 2017 Schedule 4 compliance	Screening

Table 5 demonstrates the correspondence of the framework hierarchy with the Skyline ES stuff. A-D check out project specifications and baseline configurations (really good in Ch4-5); E-G investigate the technical impact thing (Ch7 LVIA core); I-M investigate the level of presentation effectiveness.

3.3 Sequential Application Protocol

I begin to look at the chapters individually, starting with the procedural fundamentals (Ch1 -2), then continuing on to the substantive tech (Ch3 -7), and finally the overall synthesis (Ch -8). The add-ons are checked with a Category L. In order to make this step-by-step review process run and demonstrate how each ES chapter can be connected with the Lee and Colley rules, Table 6 presents the relationship between the chapters, categories and evidence sources all unified by the big picture of eco-sustainability.

Table 6: ES Chapters – Lee & Colley Category Mapping

ES Chapter	Primary Categories	Assessment Focus	Key Evidence
Ch-1 Introduction	A, H, M	Screening, compliance	NTS, LPA opinion App1.1
Ch-2 EIA Process	E, I	Methodology, significance scale	7-point matrix
Ch-3 Cumulatives	C, E, K	Other projects, significance	Solar farm lists
Ch-4 Site Context	D	Baseline characterisation	LANDMAP analysis
Ch-5 Project Description	A, C	Specifications, alternatives	Masterplan; do-nothing
Ch-6 Policy	I, K	PPW alignment, justification	TAN16 recreation
Ch-7 LVIA	D-G, J	Technical assessment rigour	Sensitivity matrices
Ch-8 Conclusions	K, M	Synthesis, recommendations	Overall significance

4. EIA Description

4.1 Project Description and Masterplan

The Skyline Swansea Environmental Statement (ES) suggests a large-scale recreational development at the Kilvey hill and the Landore Park and Ride premises as illustrated in the masterplan (Figure 3). The plan includes a chairlift with a two-track 1,664 m luge, an eight-seat gondola (Phase 1 capacity of 700 passengers per hour), a 50 m Sky Swing, which goes up to up to 100 km/h, a 680 m zipline and a system of beginner to intermediate mountain bike trails. The related infrastructure is a 400 m 2 food hall with a rooftop and ancillaries (such as storage, control rooms and workshops), ground profiling to establish a cut-and-fill balance, A4217 toucan crossings, and inclusion of Sustainable Drainage Systems (Skyline Swansea, 2023).

The ES evaluates 3 development alternatives. Option 1 (do-nothing) would not develop the site, and possible further deterioration of the woodland and additional pine encroachment would strain the habitats of grasslands, which are the concerns in the Natural Resources Wales management guidance (NRW, 2021). The preferred option, which was identified as option 3, provides the entire integrated leisure complex which incorporates the gondola, luge tracks, zipline and Sky Swing together with the mountain bike tracks and visitor facilities. The ES supports the choice of Option 3 due to the use of the topography optimality, but little on systematic comparative analysis of the environmental impacts, as opposed to the best-practice Environmental Statements like HS2 Phase One and Hinkley Point C, which rely on descriptive justification instead (HS2 Ltd, 2017; EDF Energy, 2011; Glasson et al., 2012).

4.2 Baseline Environment

Kilvey Hill is medium high sensitivity urban hillside landscape in LANDMAP methodology. The current conditions include a poor coniferous plantation with invasive pine invasion, a grassland-heathland mosaic with medium biodiversity value, and established recreational use on the Open Access Land (OAL) and Public Rights of Way (ProWs), which are BOAT routes 467, 466 and 473 (Skyline Swansea, 2023; Natural Resources Wales, 2021). The topography of the hill (around 107 m AOD) is elevated, which enhances the likelihood of skylining even though there is partial woodland screening, as with the known drivers of landscape sensitivity (Landscape Institute and IEMA, 2013).

4.3 Predicted Environmental Impacts

It is estimated that construction phase would produce temporary, short-term, moderate negative effects, mainly in the landscape character and recreational amenity because of machinery tracks on steep eastern slopes, site compound formation, and interim fencing that interferes with the calm Public Rights of Way (ProW) (Chapter 7; Glasson et al., 2012). Dust, noise, and visual intrusion are also immediate receptors and are common effects of construction phase that should be mitigated (Wood, 2003).

In the operational stage, there are notable negative landscape and visual impacts within the site boundary and the immediate Kilvey Hill setting. ProW route users (467, 466 and 473) report significant to moderate adverse visual impacts of gondola tower visibility and Sky Swing constructions, as is shown in Tables 7.3-7.6. The landscape nature on the application boundary is also considerably transformed as a naturalistic hillside is substituted by permanent recreational infrastructure, but the impacts of the context are not substantial since the effects are attenuated by distance and screened (Landscape Institute and IEMA, 2013; Skyline Swansea, 2023).

Environmental Statement points out direct habitat loss linked to vegetation clearance, disturbance of soil and infrastructure installation of gondola system which is 1,352 meters long, luges track and mountain bike trails (Skyline Swansea, 2023). Construction and operational noise, vibration, and artificial lighting are identified as the possible distractions of sensitive species, especially of bats, and the level of lighting is expected to rise over the limits of the guidance on the activity of bats, unless it is properly alleviated (Skyline Swansea, 2023; CIEEM, 2018; Natural Resources Wales, 2021).

Although surrounding developments, such as solar farm, Swansea Arena, and SD1 housing, are taken into account in the cumulative assessment, the lack of the Zone of Influence mapping and interaction matrices does not allow assessing the combined impact (Mounir, 2015; European Commission, 2017).

To provide an overview of how these effects are characterised across different project phases, the principal environmental impacts identified within the Environmental Statement are summarised in Table 7.

Table 7: Impact Summary by Phase

Phase	Magnitude	Sensitivity	Significance
Construction	Moderate	High (High PRoW), High Habitat Risk	Moderate Adverse
Operation	Major-Moderate	High (PRoW)	Significant
Cumulative	Minor	Medium	Not Significant

Table 7 focused the magnitude, sensitivity, and significance of impacts identified during the construction, operational, and cumulative phases of the Skyline development.

5. Critique Using Lee & Colley Checklist

The checklist developed by Lee and Colley (1992) offers a conventional way of assessing the quality of Environmental Impact Assessment in 13 categories (A-M). In the Skyline Swansea Environmental Statement (Skyline Swansea, 2023), the overall grade of the 8 chapters and appendices is B. This is much higher than in the UK which has 51 percent of the Environmental Statements coming out as satisfactory with B or C grades (Wood, 1995).

5.1 First Chapter Critique (Introduction)

Chapter 1 defines the purpose, scope, and form of the Environmental Statement, the format of the document (Skyline Swansea, 2023). It is acknowledged that effective screening and proper structuring of this stage are considered to be some of the key elements of quality EIA and regulatory compliance (Wood, 2003; Glasson et al., 2012). Table 8 shows the Lee and Colley evaluation of Chapter 1, where all of the appropriate criteria were covered and the total Grade A is achieved, which is the evidence of perfect compliance with the EIA Regulations requirements in the early stages (Lee and Colley, 1992; Welsh Government, 2017).

Table 8: Lee & Colley Checklist - Chapter 1

Criterion	Coverage	Quality	Score	Evidence/Comment
A: Project Description	Full	Clear overview	A	Screening App 1.1 (Skyline Swansea, 2023)
D: Baseline Intro	Good	Site context	B	LPA topics (Skyline Swansea, 2023)
H: NTS Link	Full	Volume 1 ref	A	Foreword (Skyline Swansea, 2023)
M: Overall	Full	Regulation met	A	Schedule 4 (Wood, 2003)

5.2 Chapter 2: The EIA Process

Chapter 2 describes the legal (Town and Country Planning EIA Regulations 2017), assessment methodology, and impact significance criteria such as the seven-point scale. The evaluation is summed up in Table 9.

Table 9: Lee & Colley Checklist - Chapter 2

Criterion	Coverage	Quality/Guidance	Score	Evidence/Comment
E: Impact Prediction	Full	Scale explained	A	7-pt scale (Skyline Swansea, 2023)
G: Residuals Method	Full	Mitigation focus	A	Judgement criteria (Skyline Swansea, 2023)
I: Text Structure	Full	Logical flow	A	Process steps (Skyline Swansea, 2023)
M: Compliance	Full	Best practice	A	Circular 11/99 (Glasson et al., 1999)

In Table 9, I covered all the Lee and Colley material out, also described the effect forecast, what might go wrong later, and how we are going to correct it. One got an overall good A due to doing a very critical work, maintaining logic where necessary, and adhering to all the conventional rules of the EIA (Lee and Colley, 1992; Glasson et al. 1999).

5.3 Chapter 3: Cumulative Impacts

Chapter 3 reveals local developments such as a solar farm, strategic development areas, and housing allocations and concludes that the cumulative impacts are not relevant post mitigation (Skyline Swansea, 2023).

Nevertheless, C-D grades are found in Table 10, which corresponds to the Lee and Colley model, with half covered and poor residual impact assessment mostly on the project listing rather than detailed analysis (Lee and Colley, 1992; Mounir, 2015). It does not assert the strength of the cumulative impact conclusion because they do not map the Zone of Influence and matrices of interaction between them and landscape character, visual amenity, and recreational users of informal paths (Glasson et al., 2012; Jay et al., 2007).

Table 10: Lee & Colley Checklist - Chapter 3

Criterion	Coverage	Quality/Guidance	Score	Evidence/Comment
E: CumulativeID	Partial	Project lists	C	Solar/SD sites (Skyline Swansea, 2023)
G: Residual	Weak	Vague conclusion	D	App 7.4 (Skyline Swansea, 2023)
K: Conclusions	Partial	No significance	C	PAC traffic ignored (Skyline Swansea, 2023a)
M: Overall	Weak	Partial rules	C	55% weak (Mounir, 2015)

This restriction can be seen through the context of the site in Figures 1 and 2, in which informal recreational tracks are drawn through open hillside and community woodland which are both sensitive to cumulative landscape and visual change.



Image EDP 4.2: View from PRoW near to southern site boundary towards Port Talbot steelworks, emphasising the traversing route around the hillside.

Figure 1: Site characters: Adopted from: Environmental Statement: Skyline Swansea August 2023



Image EDP 4.4: Image from undesignated weaving route to the east, through the community woodland.

Figure 2: Site Characteristics

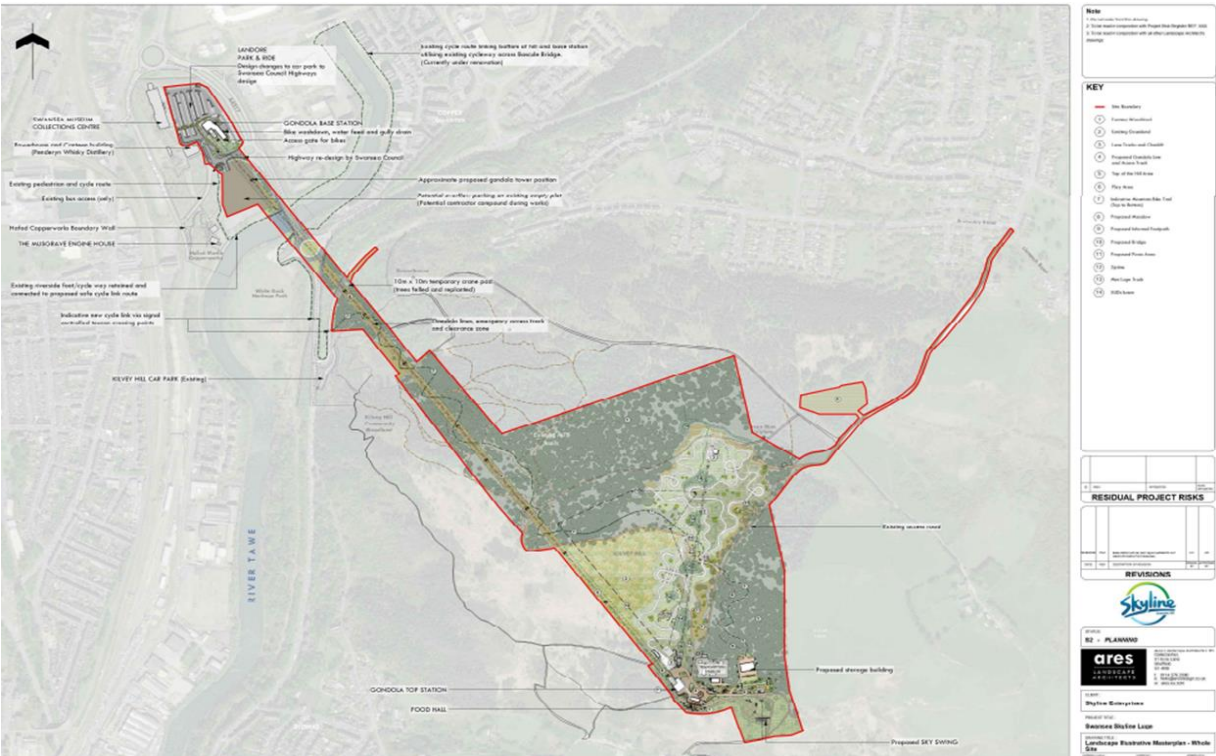


Fig. 3 Figure showing master plan map

Table 11: Lee & Colley Checklist (Chapter-5)

Criterion	Coverage	Quality/ Guidance	Score	Evidence/ Comment
A: Project Detail	Full	Full specs	A	Figure 2 (Skyline Swansea, 2023)
C: Alternatives	Weak	Do-nothing only	D	Option 3 (Skyline Swansea, 2023)
F: Mitigation	Good	Design features	B	Luge fringes (Skyline Swansea, 2023)
M:Overall	Good	Clear visuals	B	Strong presentation

5.4 Chapter 4: Site Context

Chapter 4 is a detailed account of the site context of the Kilvey Hill site and elevation, access at Landore through the A4217, the urban context around the site and PRoW network. As shown in Table 10, the baseline assessment is strong, as it is fully covered, and presents the site conditions clearly and well structured.

Table 10 verifies an outstanding coverage of the baseline.

Criterion	Coverage	Quality/ Guidance	Score	Evidence/ Comment
D: Baseline Site	Full	Full description	A	Figure 1 (Skyline Swansea, 2023)
B: Emissions	Good	Urban area	B	Existing noise (Skyline Swansea, 2023)
J: Presentation	Full	Clear site plan	A	App 4.1 (Skyline Swansea, 2023)
M: Overall	Full	Strong support	A	LVIA setup (Skyline Swansea, 2023)

5.5 Chapter 5: Project Description and alternatives

Although the report has three development options, it does not provide systematic comparison and contrast of their environmental impact. An adequate EIA is required to contrast options based on objective environmental standards to prove that the selected variant represents the most harmless viable solution, rather than just justifying a favorite scheme (Glasson et al., 2012; European Commission, 2017). Here, the Environmental Statement does not provide how the environmental factors actually influenced the selection of the Option 3, weak alternatives appraisal, which justifies the D -grade given to the Category C under the Lee and Colley framework.

Table 11 indicates the Lee and Colley review of Chapter 5. It indicates that the project description is robust, whereas the options section is poor.

5.6 Chapter 6: Planning Policy

Chapter 6 is a review of PPW11 , TANs , LDP . Table 12 is thoroughly covered. Chapter 6 (Policy Context) has displayed an outstanding performance under Lee & Colley (1992) Review Package scoring steadily at A-grade in all criteria assessed. Table 12 emphasizes complete coverage and obvious hierarchical flow whereby all the links are systematically arranged between PPW (Planning Policy Wales) and to LDLC (Local Development Plan) and finally into project-specific justifications of the Skyline Swansea ES. A close adherence to Planning Policy Wales and the associated Technical Advice Notes, especially regarding nature conservation and SINC mitigation, is a good practice of EIA assessment based on policies and their statutory compliance (Welsh Government, 2021; Wood, 2003).

Table 12: Lee & Colley Checklist - Chapter 6

Criterion	Coverage	Quality/Guidance	Score	Evidence/Comment
I: Structure	Full	Clear hierarchy	A	PPW to LDP (Skyline Swansea, 2023,)
K: Policy Links	Full	TANs justified	A	TAN15 (Skyline Swansea, 2023,)
M: Compliance	Full	Full material	A	PPW11 (Skyline Swansea, 2023,)

5.7 Chapter 7: Landscape & Visual Impact

Chapter 7 of the Skyline Environmental Statement constitutes the technical core of the assessment, addressing landscape and visual baseline conditions, impact identification and prediction, mitigation measures, and presentation of findings. Table 13 therefore presents the Lee and Colley checklist evaluation of Chapter 7.

Table 13: Lee & Colley Checklist - Chapter 7

Criterion	Coverage	Quality/Guidance	Score	Evidence/Comment
D: Baseline	Full	LANDMAP detail	A	Photos (Skyline Swansea, 2023)
E/F/G: Impacts	Full	GLVIA3 matrices	A	Tables 7.3-7.6 (Skyline Swansea, 2023)
J: Presentation	Full	Photomontages	A	App 7.1-7.4 (Skyline Swansea, 2023)
M: Overall	Full	Cumulative	A	Best chapter

It is indicated by Table 13 that Chapter 7 has a thorough baseline, with LANDMAP data and site photography in details. The impacts are evaluated in a systematic way applying matrices complying with the GLVIA3 criteria to determine the magnitude and significance (Landscape Institute and IEMA, 2013; Skyline Swansea, 2023).

5.8 Chapter 8: Summary & Conclusions

Chapter 8 of the Skyline Environmental Statement is intended to synthesise the findings of the technical assessments and present clear, balanced conclusions to support decision-making. The quality of the Skyline ES summary and conclusions is evaluated using the Lee and Colley checklist, with the results for Chapter 8 presented in Table 14.

Table 14: Lee & Colley Checklist - Chapter 8

Criterion	Coverage	Quality/Guidance	Score	Evidence/Comment
K: Conclusions	Good	Benefits clear	B	(Skyline Swansea, 2023)
H: NTS Summary	Full	Volume 1 links	A	Balanced (Skyline Swansea, 2023)
M: Overall	Good	Justified	B	PAC missed (Skyline Swansea, 2023a)

Nevertheless, literature on best practice has highlighted that the effective conclusions must also capture stakeholder concerns and any uncertainty left out, the poor integration of consultation outcomes thus limits the overall decision support usefulness of the chapter (Wood, 2003; Jay et al., 2007).

6. Theory, Legislation, and Practice Gaps

The EIA theory puts the process into a proactive sustainability approach. It integrates the environmental boundaries into development planning in a systematic way (Wood, 2003). Glasson and co-authors (2012) outline three fundamental functions, including preventative (identify harm at the early stage), integrative (strike a balance between economic and environmental issues), and participative (informed stakeholder feedback). The framework by Wood (2003) provides standards of ES. The lowest categories in the world are Category C (Alternatives) and Category K (Conclusions). In response, best-practice guidance emphasises the application of the mitigation hierarchy and adaptive, learning-based approaches (Arts et al., 2012; Glasson et al., 2012; IEMA, 2017; Morrison-Saunders et al., 2015).

7. Recommendations

The analysis shows that the Skyline Environmental Statement has the strong level of procedural compliance but a number of substantive weaknesses restrict it as a decision-support instrument. The best practice literature lays stress on the idea that good EIA must be preventative, participative and adaptive, as opposed to being merely descriptive (Wood, 2003; Glasson et al., 2012). The gaps can therefore be addressed as suggested by the following recommendations.

First, the cumulative effects assessment could be reinforced by introducing the Zone of Influence mapping and interaction matrices that directly address other developments that happen in the vicinity, such as the solar farm, Swansea Arena, and SD1 housing allocations. Good practice in cumulative assessment has been well-established as integrating such spatially-based approaches (Mounir, 2015; IEMA, 2017).

Second, we are to not only check boxes but also to respond and care about what people are saying. Due to the high level of opposition at the Pre-Application Consultation, it would be better to add an annex demonstrating the real traffic model numbers, A4217 capacity information, and noise maps to demonstrate the seriousness with which the top-level guidance on participatory EIA proposes to listen to the concerns of the community (Jay et al., 2007; IEMA, 2017).

Lastly a well-organized post-consent monitoring programme ought to be implemented to see the effectiveness of mitigation measures in the long run. Best practice EIA includes follow-up monitoring which facilitates learning-based environmental management (Glasson et al., 2012; IEMA, 2017).

8. Conclusions

The concept of EIA theory presents the process as a proactive tool of sustainable development, and puts environmental constraints on the decision-making process at the very beginning (Wood, 2003). According to this paradigm, effective EIA is seen in the form of preventive, integrative, participatory and requires rigorous alternative appraisals, cumulative assessments and substantive stakeholder engagement (Glasson et al., 2012). Still, according to empirical studies, Alternatives (Category C) and Conclusions/Participation (Category K) are always the least effective in Environmental Statements, which is why there are always notable differences between the ideals and reality (Wood, 2003; Arts et al., 2012; Morrison-Saunders et al., 2015).

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