

WORKING WITH THE SEA DIRECTIVE

Do's and Don'ts Guide to generating and developing alternatives

Assessment of alternatives is at the heart of the strategic environmental assessment process. The SEA Directive envisages that reasonable alternatives will always be considered in the development and environmental assessment of plans and programmes. Under the Directive, plan and programme proponents should ensure that:

- '...reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated' (Article 5.1)
- the Environmental Report includes information on '...the likely evolution [of the environment] without implementation of the plan or programme;' (Annex 1(b))
- the Environmental Report includes 'an outline of the reasons for selecting the alternatives dealt with' (Annex 1(h))
- a statement is prepared summarising '... the reasons for choosing the plan or programme as adopted, in the light of the reasonable alternatives dealt with.' (Article 9.1(b))

There are no right or wrong answers to developing alternatives. The following do's and don'ts list suggests some good practice in developing alternatives which may be helpful to plan and programme makers and SEA practitioners, but further good practice is likely to emerge. Some case study examples of current practice in developing alternatives are available at www.levett-therivel.fsworld.co.uk/.

"Alternatives" and "options" can in many contexts be considered synonymous. In the preparation of spatial plans and some other plans and programmes, however, specific options are put forward as part of the process, to be developed or eliminated. In SEA, consideration of alternatives need not be limited to such formally presented options. The Do's and Don'ts refer to "alternatives" except where the context clearly relates to spatial planning "options", in order to make this distinction clear

✓ DO

DO identify and document the essential strategic choices that need to be made as part of your plan-making process, and discuss alternative approaches to dealing with these early on (i.e. identify the essential strategic choices that need to be made).

DO propose alternative ways to (a) deliver the plan/programme's objectives and / or (b) deal with further issues / problems identified during the scoping stage.

DO include whatever details are available on the likely range of alternatives that will be considered when consulting on the scope of the assessment, so that consultees can comment on them.

DO recognise that there are alternatives *within* the plan or programme (e.g. alternatives for housing, employment, transport etc).

DO consider, where appropriate, different tiers of alternatives:

- broad alternatives (which provide the underlying strategy for the plan/programme);
- topic alternatives; and
- alternative sites.

When considering detailed alternatives focus on those that are consistent with the underlying strategy (e.g. sites which are consistent with the broad alternatives).

DO consider the alternatives hierarchy, by asking:

- Is development necessary? If so,
- How should it be done? Then,
- Where should it go? And finally,
- Timing and detail of implementation

For high level strategic plans/programmes, 'need' may be more important than for lower level plans/programmes where alternatives for 'type, location or implementation' may be addressed in more detail.

✗ DON'T

DON'T make up alternatives just to satisfy SEA requirements.


DON'T define plan/programme objectives so narrowly as to preclude reasonable alternatives.

DON'T leave the identification and assessment of alternatives too late in the assessment process.

DON'T suggest only one high level plan/programme wide alternative (e.g. the plan/programme is either socially or environmentally or economically orientated).

DON'T unnecessarily produce alternatives for every minor issue or every permutation of every option.

DON'T confuse mutually exclusive alternatives (e.g. build X v. don't build X) with mix-and-match alternatives (e.g. build X, build Y next door). The sustainability of the former needs to be compared and a preferred option selected; the latter need to be individually tested and potentially combined as a preferred option. If using both approaches for different topics make this clear to consultees. Each alternative should be reasonably distinct.

 **DO**

 **DON'T**

DO use alternatives to illustrate issues and tensions which should be addressed as the preferred options are refined (e.g. use an environmentally focused alternative to highlight economic implications and an economically focused alternative to highlight environmental implications). Use these to help prepare a preferred alternative for the plan or programme that combines the best sustainability outcomes.

DON'T present extreme or unrealistic alternatives in order to support a preferred middle alternative (e.g. avoid alternatives for targets for affordable housing simply based on (a) market driven levels, (b) 35% of housing (preferred option), or (c) 100% of housing).

DO consider alternatives that may be politically controversial or that contradict higher-level policies if you can show that doing so would clearly lead to a more sustainable solution. Sustainable development involves pursuing new and innovative approaches to future development.

DON'T suggest alternatives that are clearly unrealistic or infeasible (e.g. technically, financially). Stakeholders should be presented with genuine alternatives.

DO document how the alternatives have been developed and identify constraints to generating alternatives... but...

DON'T ... just accept constraints on alternatives as a given. Query how much room for manoeuvre there may be.

DO proactively engage with the community and stakeholders (including those from neighbouring authorities) in generating and developing alternatives and be willing to consider new alternatives as they emerge through the plan/programme-making process.

DON'T treat consultation as a public vote on which of the alternatives should be taken forward. The community is relying on decision makers to make informed decisions, taking into account community views as well as the full range of sustainability considerations.

DO inform decision makers, including elected members, of the requirement to appraise the alternatives considered.

DON'T just assume decision makers know or understand what is meant by alternatives or alternatives.

FURTHER READING:

Guidance:

- *Implementation of Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'* European Commission – Environment Directorate-General, 2003. (European Commission Guidance on the SEA Directive).
- *A Practical Guide to the Strategic Environmental Assessment Directive*. Office of the Deputy Prime Minister and Administrations in Scotland, Wales and Northern Ireland, September 2005. (Generic guidance on SEA of plans and programmes in the UK).
- *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*. Office of the Deputy Prime Minister, November 2005. (Guidance for the spatial planning sector in England on how to undertake Sustainability Appraisal, incorporating SEA).

Planning Inspectorate Reports addressing the consideration of alternatives in spatial planning in England:

- *Report to Lichfield District Council - Report on the Examination into the Core Strategy Development Plan Document*. The Planning Inspectorate, July 2006.
- *Report to Stafford Borough Council – Report on the Examination into the Core Strategy Development Plan Document*. The Planning Inspectorate, July 2006.