Considering alternatives during the EIA process

Stephen Kirkpatrick, from Chris Blandford Associates, describes why proper examination of development alternatives is important to successful environmental impact assessments (EIA).

Related articles

- Town and Country Planning (EIA) Regs 2011
- A fresh look at environmental statements

One of the commitments established by IEMA in its EIA Quality Mark scheme is that practitioners commit to ensuring that EIAs refer to any development alternatives considered during the process and that the influences of such alternatives on the scheme are transparently set out.

Part II of Sch.4 of the EIA Regulations requires the applicant to provide “an outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects”.

Although the regulations only require an environmental statement to present a discussion of alternatives where the developer has considered them, good practice encourages practitioners to consider:

- alternative locations and scales of development;
- alternative site layouts and access arrangements;
- different approaches to scheme design; and
- alternative processes and alternative phasing of construction.

In cases where no alternative sites were considered, the reason why alternative sites were not feasible should be explained.

Good practice also encourages EIA practitioners to:

- outline how the scheme has evolved since project inception;
- explain why alternative options have not been selected;
- assess the "do nothing" option (i.e. the possibility of not carrying out the proposed development at all); and
- identify the main reasons (including environmental) for the final choice of the preferred alternative, which should involve a comparison of the magnitude and significance of the effects of all the alternatives considered.

It is important that EIA practitioners do not omit consideration of alternatives on the grounds that those sites have not been considered for whatever reason. To do so would detract from the valuable role that considering alternatives brings to the planning and design of high-quality, sustainable development.

Alternatives should ideally be identified and assessed at all key stages of the planning and design process, including: site location, development scale and scheme design.

In reality, the scope and level of detail considered as part of the alternatives assessment will vary depending, for example, on the planning context, development type and project requirements.

Frequent criticisms of the process are that alternatives are:

- not adequately documented;
- too subjective or arbitrary to provide any meaningful contribution to the EIA process; and/or
- considered at a late stage in the EIA process with the result that they are not adequately investigated due to financial or time constraints.

Although there is no requirement for a developer to assess other potential development sites, which may not be in their control, consideration of a range of alternative sites may bring enhanced robustness to the planning and design process and may reduce the risk of third-party objections.
These objections may be based on the adequacy of the environmental statement either because some key parts of the assessment have been omitted or in terms of the quality of the assessment, including alleged failures to include proper consideration of alternatives.

One key opportunity for enhancing the quality of the alternatives assessment lies in the scoping opinion process, which provides an early opportunity for engagement by the project proponent with not only the regulatory authority and statutory consultees, but also with other expert bodies and the public.

It is at this stage that the issue of alternatives needs to be more effectively fleshed out through consideration, as appropriate, of site location options, development scale options, types of processes, means of access, building design concepts and site layout, for example.

This exchange of ideas and information about the nature of the proposed development provides the potential for promoting informed debate, facilitating well-informed comments, enhancing the speed of decision-making (saving time and money) and favourable publicity for both the development and the developer.

It also provides the opportunity for earlier identification of local concerns and resolution of contentious issues, and for enhancing the quality of the development in environmental and other terms.

There is still much work to be done to achieve a greater understanding of the potential value of the scoping opinion exercise and its worth to both the EIA process and to the objectives of achieving a development that provides the “best fit” in environmental terms, community involvement and achieving high-quality, sustainable development.

Finally, the need for clarity and transparency in the environmental statement, when reporting how consideration of alternatives has helped determine the development proposal, is an essential part of justifying the proposed development and allowing stakeholders to understand that they have been able to influence the scheme through a positive, informed contribution to the scoping opinion.
This article was written as a contribution to the EIA Quality Mark’s commitment to improving EIA practice.

Stephen Kirkpatrick is a senior associate at Chris Blandford Associates

For access to more EIA articles, case studies and hundreds of non-technical summaries of Environmental Statements visit: www.iema.net/qmark