Do Nothing – But Do it Well: Experience from SEA Practice

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The ‘Do Nothing’ Alternative in SEA

OUTLINE

1. The origins of Do Nothing
2. Do Nothing options in SEA
3. Examples from Western Australia and UK
4. Conclusions
1. The Origins of Do Nothing in IA

Consideration of alternatives generally
- Allows a comparative evaluation of the proposed alternatives
- ...so that best choice of action can be selected!
  - cost effective & best reduced environmental impact

Consideration of Do Nothing alternative
- Traditionally provides baseline environmental data for the assessment phases of IA.
- Baseline enables comparison of new proposal with environmental conditions if project were not to proceed
  - equivalent of proposal need

Range of alternatives – options
- alternative approaches – different ways to achieve objectives
  - eg railway vs new roads to alleviate traffic congestion
- alternative design - different locations, scale of development, technologies etc.
  - eg waste disposal via landfill, incineration or recycling
- The Do Nothing option!

2. Do Nothing options in SEA

- Brief scrutiny of existing SEA Environmental Reports indicates that the ‘Do Nothing’ option is rarely addressed in current SEA practice in UK and Australia.
- As it is a Policy, Plan or Programme, are practitioners assuming something will be done?
- We have identified a range of types of SEA ‘do nothing’ options...

Approaches to Do Nothing consideration in SEA
1. Establish baseline – (traditional EIA do nothing approach)
2. Do something – (definitely not going to do nothing)
3. Pretend to consider doing nothing – (but really intend to do something)
4. Genuine do nothing options – (4 types)

(1) Establish baseline – traditional EIA do nothing approach
- Proposed plans and programme alternatives still require some form of baseline context
- Project EIA compares new proposal with a fixed ‘environment now’ time point (T₀)
- SEA plans and programmes may have to consider implications of environmental change against a baseline environmental context that will change with time i.e T₁₀ , T₂₅ , etc.
- EIA expects immediate development action but there is no guarantee with SEA.
  - Action may manifest itself in changes to management processes, new policies, extension in the life of existing assets ...

(2) Do something – (definitely not going to do nothing)
We are going to do something because we have:
- a budget that must be spent by the end of financial year, or
- a contractual obligation to fulfil!
(3) Pretend to consider doing nothing – (but really intend to do something)

Bogus treatment of do nothing option...

- baseline is bad and getting worse
  - because of existing environmental impacts or social decline, it would be irresponsible not to implement SEA proposal

- baseline will get worse without new SEA proposal
  - doing nothing would deny ‘essential’ new services to industry or community, leading to economic/social downturn in future

- stupid to do nothing because of missed opportunities
  - if don’t implement SEA proposal, will miss out on benefits so valuable, it would be stupid not to proceed

(4) Genuine do nothing options

4 types can be identified in SEA...

(i) The ‘economic and social do nothing’ option

- If SEA proposal is not economically viable then doing nothing may be the default or preferred strategy
  - i.e. can’t afford to do what is proposed

- Or, despite any existing problems that might exist (environmentally or socially), community is happy to live with status quo.
  - i.e. ultimately prefer no change

The recommendation (through SEA) may still be for a new strategic action, but the final course of action is to do nothing!

(ii) The ‘default do nothing’ option

- There is no reason to act because there is capacity in existing system to accommodate predicted growth/changes, e.g.
  - road network has capacity for further traffic increase
  - the habitat is healthy and robust
  - this section of river or coast is not going to flood in 100 years context of the plan

This option may arise when there is a statutory requirement to periodically revise plans (i.e. a form of SEA)

(iii) The ‘do absolutely nothing’ option

Doing nothing is imperative
- This area is too environmentally sensitive to meddle with
- This economic zone is in a perilous state of recovery
  - e.g. Water resources are at a critical balance between natural input & human outtake

There is simply no capacity for new development.

(iv) The ‘Machiavellian’ do nothing option

- If I do nothing, I may force you to do something.
  - e.g. if I do not put in extra power supply I may force you to start looking at energy reduction

This involves strategic inter-politics between plan makers.
3. Examples from Western Australia (i)

**Pretend to consider doing nothing**
- baseline is bad and getting worse

- "Maintaining [current use] will ensure continued degradation of Point Doura Peninsula, no delineation of the conservation area & no early rehabilitation coupled with increased use.
- The Point continues to be used for unrestricted vehicle access, rubbish dumping & camping. Recent bushfires have also reduced quality of native flora."

Examples from the UK (i)

**Default do nothing**

- UK Flood risk management strategies – Lower Trent Tributaries
  - Strategies determined ‘Do Nothing’ was the preferred management option
  - Flood risk <1 in 75 years
  - Assets in reasonable condition for the 5 year review period of the strategy

Examples from Western Australia (ii)

**Pretend to consider doing nothing**
- baseline is predicted to get worse without new SEA proposal

- "Both industry & Government have indicated need for infrastructure to service Goldfields.
- The ‘no corridor’ option could result in infrastructure being developed piecemeal and has potential to result in a much larger overall impact on environment & community.
- It would also increase difficulty of gaining approval to construct infrastructure, thereby discouraging further development in region."

Examples from Western Australia (iii)

**Pretend to consider doing nothing – stupid to do nothing because of missed opportunities**

- "An increase in electricity demand is closely linked with population & economic activity growth.
- If power generation plant construction is delayed, the ability of existing ageing plant to meet demand would be increasingly compromised.
- Unless industry & community are prepared to accept increasing interruption to power supplies then additional power generation is needed in near future.
- Other potential losses to the State by this project not going ahead includes loss of local employment and service provision opportunities & loss of capital investment."

Examples from the UK (ii)

**Machiavellian do nothing**

- Flood plain management
  - Withdrawing/non-renewal of existing flood defences, coupled with a statutory role for approving significant new development, can block housing creep in important flood plains
  - i.e. if no flood protection, developers won’t risk building new houses

4. Conclusions

- Potential for consideration of do nothing option in SEA is broader than many SEA reports currently consider
- Quality and strategic evaluation & analysis of do nothing alternatives in current SEA practice is limited
- We need to ‘lift the bar’ on consideration of alternatives in SEA generally

When we consider doing nothing in SEA, we need to do it well!