



The paradox of strategic environmental assessment

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ABSTRACT

Strategic Environmental Assessment (SEA) is a tool that can facilitate sustainable development and improve decision-making by introducing environmental concern early in planning processes. However, various international studies conclude that current planning practice is not taking full advantage of the tool, and we therefore define the paradox of SEA as the methodological ambiguity of non-strategic SEA. This article explores causality through a three-step case study on aggregate extraction planning in Denmark, which consists of a document analysis; a questionnaire survey and follow-up communication with key planners. Though the environmental reports on one hand largely lack strategic considerations, practitioners express an inherent will for strategy and reveal that their SEAs in fact have been an integrated part of the planning process. Institutional context is found to be the most significant barrier for a strategy and this suggests that non-strategic planning setups can prove more important than non-strategic planning in SEA practice. Planners may try to execute strategy within the confinements of SEA-restricted planning contexts; however, such efforts can be overlooked if evaluated by a narrow criterion for strategy formation. Consequently, the paradox may also spark from challenged documentation. These findings contribute to the common understanding of SEA quality; however, further research is needed on how to communicate and influence the strategic options which arguably remain inside non-strategic planning realities.

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Introduction

A paradox is a seemingly contradictory statement that may nonetheless be true, like: Strategic Environmental Assessments (SEA) is not strategic. This is a provocative statement, as SEA is implemented into national legislation in countries worldwide, based on the belief that it secures strategic considerations in decision-making on the policy, plan and programme (PPP) levels of activity. McGimpsey and Morgan (2013) describe mandatory inclusion of strategic alternatives and assessment of systemic effects as the primary benefit of introducing SEA in a non-mandatory planning context; yet, Tetlow and Hanusch (2012) conclude that especially these strategic elements appear to be lacking in practice. Such experiences from Canada, Austria, England, Finland, China, Greenland and Italy have been published (Bragagnolo et al., 2012; Hansen and Kørnø, 2010; Noble, 2004; Söderman and Kallio, 2009; Stoeglehner, 2010; Zhou and Sheate, 2011).

The suggested solutions for avoiding this paradox differ according to the different reasoning suggested. Stoeglehner (2010) argues that a change of planning paradigms towards more future oriented approaches is required, while Bragagnolo et al. (2012) point at a need to increase focus on scoping and include relevant alternatives. Some studies find that practitioners do not assign significant value to the

task of conducting SEA and perceive it as an administrative burden (Stoeglehner, 2010; Zhou and Sheate, 2011), and a study on SEA in Belgium prior to the implementation of the European SEA Directive showed that enthusiasm to make good strategic SEAs was greatest among Environmental Assessment (EA) experts and green NGOs while administrative workers were more sceptical (Devuyst et al., 2000). Reversely, other authors find SEA practitioners driven by acknowledgement of a need for inclusion of environmental concerns at the PPP level of planning in which strategic elements are important (see e.g. Noble (2004), Zhou and Sheate (2011), Kristensen et al. (2013) and Devuyst et al. (2000)).

The general overview provided by these studies open up for a line of new questions, which seem important to answer in order to achieve an understanding of why SEAs apparently fail on strategy. These are questions like: Why do planners who appreciate SEA produce non-strategic assessments? Why are some SEAs considered of low value and perceived by planners as an administrative burden? And, why are planners sceptical towards the implementation and purpose of the tool? This article explores the causality behind the paradox of non-strategic SEAs through a case study, drawing on the experience with regional SEA of construction aggregate extraction plans in Denmark and focusing on the role of planners in relation to inclusion of strategic elements in the SEAs. First, the article presents the concept of strategy in SEA. Secondly a description of the planning context and the case study methodology will be provided. The article then presents findings and discusses whether environmental assessments of aggregate extraction plans in

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Denmark can be strategic; given the institutional structure of the sector. Finally, it compares case study findings with the international experiences that served as a point of departure in order to elaborate on the causality of the paradox of SEA.

The concept of strategy in SEA

The term “strategic environmental assessment” has been around for a few decades now (see Therivel et al. (1992)) and various opinions and interpretations of its societal purpose exist. Therivel (2010) defines SEA as “a process that aims to integrate environmental and sustainability considerations into strategic decision-making”, while Partidário (2012) argues that the purpose of an SEA is “to help understand the development context of the strategy being assessed, to appropriately identify problems and potentials, address key trends, and to assess environmental and sustainable viable options ... that will achieve strategic objectives”.

SEA developed from the field of environmental impact assessment (EIA); however, several methodological differences exist between the two tools. While EIA represents a reactive technical tool designed for mitigating (and preferably avoiding) impacts of proposed projects, Noble (2000) argues that SEA is a tool for proactive and broad assessment of development alternatives for PPPs. However, the difference between the two tools is not always easy to spot, since some SEAs in practice share many characteristics with EIA methodology — commonly referred to as EIA-based SEAs. Authors within the impact assessment (IA) community have in this regard argued that it is necessary to distinguish between “strategic SEA” and “EIA-based SEA” (Partidário, 2012).

Though commonly referred to as a tool, SEA represents a process which can improve decision-making and spark sustainable development. The strategic SEA is therefore arguably related to planning objectives, timing of the planning process and inclusion of what is referred to as strategic elements — i.e. assessment of alternatives and cumulative impacts. Inspired by Therivel (2010) and Partidário (2012), Fig. 1 illustrates our interpretation of a strategic SEA planning setup. The SEA process (1) is here closely assigned to the decision making process (2), why alternatives, cumulative effects and other systemic sustainability impacts are continuously taken into account in an iterative fashion. The product of this process is an environmental report (3) that documents the SEA considerations, as required by e.g. The European Parliament, (2001), and the approved plan (4) which ideally has been adjusted in accordance with the environmental concern of the strategic planning process.

The definition of “strategy” in SEA has received quite a bit of attention within the IA community. Noble (2000) summarises the term as “the determination of objectives and means, and the adoption of courses of action to achieve specified ends”. Cherp et al. (2007) investigated the concept of ‘strategy formation’ in SEA and point out that strategic elements are generally conceived as introduced in formal processes based on a rational decision-making model, whereas strategy

formulation in reality often is happening as an informal process in which strategies are emergent rather than deliberate. Cherp et al. (2007) suggests that an expectation of formal strategy formation in SEA may lead lacking influence of PPPs, and they argue that mainstream SEA methodology apply a prescriptive notion of strategy formation in which the ‘ideal’ strategy must be established prior to planning. Cherp et al. (2007) further points out that a descriptive strategy formation which fits the planning context and which can be adjusted as challenges emerge may prove more efficient, since it represents actual planning practice.

We explore the paradox of non-strategic SEA by analysing the different elements of the SEA planning model — presented in Fig. 1. First, a document review and analysis investigates the strategic elements in the environmental reports (box 3) based on a prescriptive notion of strategy. Secondly, a questionnaire survey and follow-up communication reversely apply a descriptive notion of strategy for exploring the interaction between the SEA process (box 1) and the planning process (box 2) in order to uncover how plans (box 4) are developed. The purpose of the analysis is to gain understanding about what the level of strategy is, where planners would like to see their tool application develop, and more importantly why they are not doing it.

Methodology

Danish aggregates planning as case study

The case chosen as a subject to analysis is SEA related to regional planning of mineral resource extraction in Denmark; commonly referred to as aggregates extraction planning due to societal purpose. The public sector in Denmark is threefold, divided between the state, five regions and 98 municipalities (Indenrigs- og Sundhedsministeriet, 2005), wherein the regions are responsible for the health system, transport, education, environmental development, handling of soil pollution, and lastly resource planning. In Denmark, the primary tool to secure inclusion of environmental considerations at the strategic level in relation to the aggregates industry is SEA of regional resource planning, or more specifically the regional aggregate extraction plans, identifying and zoning deposits available for potential production (Miljøministeriet, 2013). The Danish aggregate extraction plans are forthcoming referred to as “aggregate plans”, while the assigned SEA documents will be referred to as “environmental reports”. No further centralised national management scheme exists, and the regional level thus remains the highest managerial level for aggregate extraction in Denmark. Despite representing the most strategic planning level, regional management must tier down to the municipal level where further project specific EIAs are undertaken in relation to technology applications for extraction licences (Miljøministeriet, 2013).

SEA in the construction aggregates sector of Denmark offers a good platform for an interesting and relevant case study on why SEAs lack strategy, since regional planners on several occasions have expressed difficulties in applying the tool. The aggregate planning context appears rather straight forward at first glance, and Denmark is a rather small country with a long history of environmental planning; hence, difficulties in applying SEA with a desired level of strategy and inclusion of strategic elements would be unexpected. A case study can provide a practical and exact illustration of specific challenges within the field subject (Rendtorff, 2009) and it can be exploratory, descriptive or explanatory (Yin, 1993:5). The study presented in this article is based on a case study methodology presented by Rendtorff (2009), and it can be characterised as “explanatory”. Focus is on understanding the role of SEA in decision-making, with an emphasis on exploring the three whys presented in the introduction. Common types of data in explanatory case studies are the data from documents, archival records, interviews, and participant observations (Yin, 2003:86). The case study in scope applies a mixture of these data collection forms, and the sources,

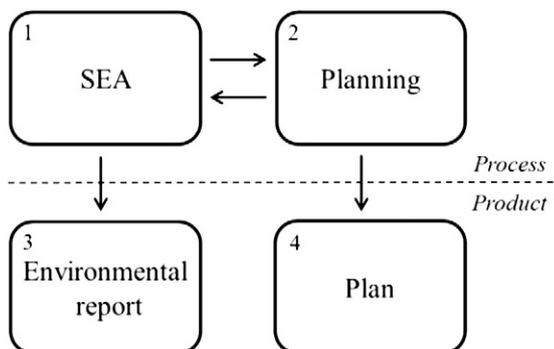


Fig. 1. The strategy-based SEA.

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