Strategic Environmental Assessment (SEA): will sustainability be weak enough to dilute it?

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Draft 12 November 2004 for the Conference on the Human Dimensions of Global Environmental Change, Berlin 3-4 December 2004.

Abstract

This paper examines early UK experience with implementing the SEA Directive to explore its role in strengthening environmental policy integration, and considers the wider context of *ex ante* assessments that may evolve to dilute this effect. SEA proceeds from an overview of the state of the environment to explain how significant environmental effects may arise, while creating an open, participative framework for reasoned debate about the findings. This contrasts with many "integrated appraisal" or "sustainability appraisal" systems such as those used in recent UK land-use planning. These typically begin with economic, social and environmental criteria for judging a proposal, and then compare the expected (rather than assessed) outcomes against the listed criteria. The legal requirements to comply with the SEA Directive (effective from July 2004) clearly will strengthen consideration of the environment in public sector planning. On the debateable premise that this could create an imbalance in favour of the environment, the UK Government has responded by making efforts to give a similar boost to the economic and social agendas in its sustainability appraisal system. In draft government guidance on this issued in September 2004 it appears that social and economic appraisal will begin to make more use of evidence-based reasoning and formal participation procedures for advocates of economic and social agendas. This is not to say such advocates will then be any less active in influencing plans outside of the plan appraisal system, not least through efforts to shape national policies. By asking what is being integrated with what, and on what premises, this paper will shed light on the role of ex ante evaluation in the greening (or otherwise) of policies.

Acknowledgements: Ivan Scrase was funded by an Economic and Social Research Council Postgraduate Training Award - a CASE Studentship between Imperial College London and the Environment Agency of England and Wales, 2000 – 2003. William Sheate is Reader in Environmental Assessment at Imperial College. Section one includes some extracts from POST (2004) written by Ivan Scrase. The ESRC funded this work under a three-month Fellowship with the Parliamentary Office of Science and Technology in 2004. Sections three and four include some extracts from Sheate (2003).

1. Introduction

SEA is the subject of new legislation that came into force on 20 July 2004, implementing European Directive 2001/42 (EC, 2001). It requires environmental effects to be taken into account by authorities during the preparation of plans and programmes in the fields of land-use, transport, waste and water management, energy, and a range of other sectors. This introduction outlines the aims, scope and requirements of the legislation, and the implications for plan- and programme-makers and other parties, drawing on material from POST (2004). The paper then discusses SEA in the context of other *ex ante* assessment approaches, and its relationship to sustainable development and environmental policy integration (EPI) agendas. This draws on an analysis of responses to the UK government's consultation on the SEA regulations, of the content of subsequent government guidance on conducting SEA within a sustainability appraisal framework for spatial planning, and an historical overview of the origins of SEA (Sheate, 2003).

The Directive aims to "provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development…". A central purpose of SEA is to anticipate and improve the overall environmental effects of proposed patterns of spatial development, and of multiple individual projects. It aims to anticipate the "likely significant environmental effects" of implementing a plan and its "reasonable alternatives", with a view to avoiding, reducing or offsetting any negative impacts. Its use can improve foresight regarding potential effects of future plans, for example on protected or environmentally sensitive sites. In the longer term, proponents of SEA argue that it will promote a more open, transparent and evidence-based planning culture. Individual development projects may require Environmental Impact Assessment (EIA) under the 1985 EIA Directive. EIA of projects, however, comes at a late stage in public decision making. Important commitments will have already been made regarding work programmes, local or regional plans, and national policies. SEA can be applied to all of these "strategic" tiers of decision-making, but is restricted to certain programmes and plans in the Directive. In the UK many plans subject to SEA will be for land-use, including the new Regional Spatial Strategies and Local Development Documents. Others include offshore energy licensing rounds, Waste Local Plans, Catchment Flood Management Plans, Water Company Resource Strategies, and Local Transport Plans.

The Directive applies to mainland and offshore plans for which preparation started after 20 July 2004 (or if started earlier, where the plan will be adopted after 21 July 2006). To require SEA, plan preparation must be by (or for) an authority (or a utility acting as an authority) and its preparation must be a "legislative, regulatory or administrative" requirement. This effectively excludes national policies and laws, plans that are not strictly "required", and most private sector plans. The Directive applies to plans prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning, or land use that "set the framework" for future development consents listed in the 1985 EIA Directive

(85/337/EEC). SEA is also required where a plan is likely to significantly affect a nature conservation site protected under the Habitats Directive (92/43/EEC).
Where it is determined by the authority or a government Ministry to be "likely to have significant environmental effects", SEA is also required for any other plan that sets the framework for future development consents, or falls within the core sectors above and determines "the use of small areas at local level" or is a "minor modification" of a plan. Exceptions apply to plans solely serving national defence or civil emergencies, or that are solely budgetary/ financial in nature. Plans under EC Structural Funds, including agriculture are exempt to 2006/7. Plans initiated before 21 July 2004 (and not adopted by 21 July 2006) are exempt where the plan-maker considers SEA "unfeasible". Under devolved powers, the Scottish Ministers have decided to apply SEA beyond the Directive's requirements. In a forthcoming bill, SEA will apply to a wider range of plans and programmes and also to policies, regardless of whether their preparation is "required" or sets the framework for future development consents of projects.

As defined in the Directive, SEA is a set of procedures relating to the provision of information, consultation, preparation of an environmental report and taking findings into account in planning. Tools or methodologies for impact prediction are not mandated, and provision is specifically made within the Directive for SEA to be integrated with other appraisal processes, provided the legal requirements are still met. Undertaking an SEA might require 50 to 100 person-days of work, but could vary widely depending on data requirements and the level of proactive consultation. The key procedural requirements are as follows:

1. Screening **-** the relevant ministry may require SEA to be undertaken, but routinely the decision rests with the plan-maker, in consultation with the environmental authorities. These authorities are defined in the transposing regulations, and for English or UK-wide plans they are the Environment Agency, English Nature, English Heritage and the Countryside Agency. Within 28 days of making a screening decision the plan-maker must publicise it. If it decides against an SEA, it must give reasons for this. The screening rules are complex and challenging to interpret. As the UK regulations were being introduced this led to considerable uncertainty among plan makers and environmental authorities as to which plans would require SEA. The complexity of the rules appears to have resulted from protracted negotiations over the Directive: there were concerns not to require SEA for "policies", and a legally distinct definition of a "plan or programme" is problematic.

2. *Scoping and preparing an environmental report* – an annex to the Directive sets out the assessment requirements. Plan-makers must interpret these in consultation with the environmental authorities, whose advice must be provided within 5 weeks, but need not be followed. The report sets out the plan's objectives and its relationship to relevant environmental policies and problems. A baseline environmental study is required, plus an assessment of likely significant environmental effects of implementing the plan and its reasonable alternatives, and how these are to be addressed. Thirteen categories of effect, such as flora, water, cultural heritage and landscape, are identified in the Directive.

3. Consultations - The plan-maker is required to send the draft plan and environmental report to the environmental authorities, and to announce their availability to "*public consultees*" (NGOs and others identified by the plan maker as affected or interested parties). Comments must be invited for a time period that allows for effective expression of the environmental authorities" and the public consultees' opinions. The documents must also be available for inspection by any member of the wider public, but this need not be publicised. If a plan is likely to affect the environment significantly in another Member State (MS), the documents must be forwarded to that state, to allow for similar consultations there before adoption of the plan.

4. Information as to adoption - opinions expressed during the consultation period, and the findings of the report, must be taken into account before finalising the plan. Once it has been adopted, the plan-maker must publicise the availability of the final plan and its report. They must also state how environmental considerations, the report and opinions have been taken into account, why the plan was chosen over alternatives, and arrangements for monitoring the environmental effects of implementation.

2. SEA, sustainability and other **ex ante** *appraisals*

Assessment is an increasingly popular mechanism for shaping and/or vetting proposals for compliance with a range of policy goals. There may be multiple assessment requirements at a single stage of decision-making, and a hierarchy of assessments from projects to programmes, plans and policies. Because of concerns to avoid duplication of effort, SEA allows for joint procedures with other assessments, and for data collected for other purposes to be used. In land-use planning and transport, SEA requirements in the UK are to be integrated into other appraisal systems (see below). Questions then arise about the appropriate scope and detail to be considered at each level of a hierarchy, the kinds of alternatives to be considered, and the locus of responsibility. There are also concerns that integrating assessments into one another might limit their effectiveness, or create problems where conflicting aims are promoted by different requirements. For example, Sustainability Appraisal (SA) for land-use plans will incorporate SEA and possibly assessment requirements under the Habitats Directive. The latter strictly limits the use of economic or social arguments to over-ride environmental protection objectives for certain sites. SA is designed to identify such trade-offs.

The majority of UK SEAs are likely to be for spatial development plans prepared by local and regional authorities. Planning procedures have undergone major changes under the Planning and Compulsory Purchase Act 2004 (PCPA). SEA will be integrated into these new procedures, as part of a mandatory SA process for Local Development Documents and Regional Spatial Strategies. A form of SA, guided by national sustainability objectives, has been used in spatial planning since the late 1990s as good practice. SA simultaneously considers economic, social and environmental impacts, seeking to strike a balance or make trade-offs between them. SEA differs from SA in that it is solely concerned with environmental impacts, and seeks to strengthen their consideration in decision making. Compared with SEAs, existing SAs have typically focused more on objectives than on baseline data. SAs have relied more on qualitative expert judgements, rather than scientifically-informed predictions and transparent consultation procedures.

Draft guidance on SA for land use plans was issued in September 2004, and is discussed in more detail in Section 3.

Outside spatial planning, most other SEAs are likely to be for transport, minerals, waste or water management plans. In the transport sector The Department for Transport (DfT) has issued guidance on integrating the requirements of the SEA Directive into its "new approach to appraisal" (NATA). The existing approach appraises plans against 5 sets of objectives: environment, safety, economy, accessibility and integration. Objectives based appraisals are widely used in many sectors, and the revisions to NATA illustrate SEA's stronger focus on baseline data and the consideration of alternatives. According to the DfT (2004), "enhancing NATA to fulfil the requirements of the SEA Directive requires additional work on: collecting baseline environmental information and identifying environmental problems; predicting the significant environmental impacts of the plan; identifying mitigation; identifying alternatives and their effects; consulting the public and authorities with environmental responsibilities; reporting how the results of the SEA and consultation responses have been taken into account; providing a non-technical summary of the SEA; and monitoring the actual environmental effects of the plan during its implementation."

In view of these differences environmental NGOs would prefer that SEA stood alone, while economic development bodies such as Regional Development Agencies and many planning authorities are more in favour of integrating SEA into the SA framework. The following extracts from the responses to the government's consultation on its draft regulations illustrate this difference n opinion.

2.1 The case for a "sustainability" framework for SEA

The Royal Town Planning Institute (RTPI, 2004) is in favour positioning SEA as the environmental component of an SA: "The requirements for SA….should form the context for the integration of the regulations into the development planning process". RTPI called on the environmental authorities to be fully committed to this, and for direct integration of SEA outputs into SA reporting. The Regional Development Agencies (2004) were "keen to ensure that the regulations do not, because they stem from a European Directive, *create an imbalance* in favour of environmental sustainability and against a wider interpretation of the term, which also encompasses social and economic factors" (emphasis added). This argument suggests an ideological interpretation of "sustainable development" as a matter of balancing, or more precisely keeping the *existing* balance, in the political weight given to economic, social and environmental considerations.

Manchester Airport (2004) argued "[t]here is a danger of the SEA process being badly at odds with Government objectives to simplify and speed up the Development Plan process", and contrary to its efforts at "encouraging a wider involvement from a range of stakeholders". They continued, "[t]here is a danger that SEA will become a detailed and highly specialist activity, one that focuses on scientific and mechanical process rather than one that recognises and reflects the broader nature of the planning and development plan activity. Over recent years, Government, regional and local authorities have developed a range of sustainability targets and indicators. This has led to the development

of a Sustainability Appraisal process that enables delivery of more rounded and robust appraisal of a development plan's objectives and policies. We do not understand why the environmental impact of a development plan should be given a different weight and a separate process. A Strategic Environmental assessment should be embodied within a SA and not sit apart from the economic and social elements of sustainability". Here SEA is challenged on several fronts: it is presented as a threat to the government's stated aim of speeding up and simplifying planning procedures; it is challenged as technocratic and excluding; and it is presented as unfair in the sense of creating an imbalance in favour of the environment relative to (more airport-friendly!) economic and social considerations.

The water industry appears not to have welcomed SEA, and wished it to be part of a wider sustainability agenda. OFWAT (2004) the water industry regulator, argued that for private water companies "planning is driven by exogenous requirements…that by their very nature (i.e. environmental standards) make their activities necessarily compatible with environmental needs. The discretionary component of their action generally consists of the selection of business strategies and inputs selection that clearly fall in their private, and commercially confident, sphere". The main water industry lobby group, Water UK (2004) stated "[i]t would be useful t know how SEAs will be viewed in relation to wider sustainability issues that may surround plans and programmes. There is a balance to be struck and at present it is not clear how and who will make the decision about where the balance should lie." Thames Water Utilities Ltd. (2004) stated in a covering letter that "It is unclear how SEAs will fit into wider sustainability issues, covering additional social and economic aspects. This is particularly relevant to the water industry which is constrained to adopted (sic) a prescribed economic methodology in the preparation of many of its plans".

The UK nuclear industry waste managers' (Nirex 2004) response to the consultation was, perhaps surprisingly, very much in favour of SEA, and called for it to be greatly extended in scope: the three-part sustainability framework (and more) should be brought into SEA, rather than vice-versa. "Nirex believes that ethical, social, economic, environmental, scientific and technical factors should be taken into account in decision-making. Nirex believes that this can be achieved in a systematic way, early in the decision-making process by ensuring that these aspects are assessed in the SEA. The Regulations could be written to ensure that this happens by modifying the Schedules 1 and 2 of the Regulations to include the assessment of ethical, social and economic aspects in the screening and assessment stages of the SEA process." Nirex's position must be interpreted in the light of their failure to overcome political opposition to the siting of a deep repository for radioactive waste in the UK, and accusations that it operated in a secretive manner regarding its scientific evidence. Nirex's standpoint perhaps reveals a strengthening of its commitment to public participation in the face of these political challenges. Less charitably one could argue that they saw in SEA an opportunity to deal with politically charged issues and trade-offs in a largely technocratic fashion, and in arenas more removed from local politics.

In general, however, SEA is not expected to expedite planning. The Planning Inspectorate (2004) warned that "[al]though we are supportive of the implementation of

the SEA Directive, I should point out that the SEA regulations could potentially lead to longer and more contentious examination sessions. This will be particularly so if an objection is a detailed criticism of the SEA, for example of the reliability of the baseline data or the prediction methods used." There may be a risk, however, that this sort of technical challenge to the SEA could become a surrogate for expressions of political dissent concerning the proposal itself. Environmental Authorities or NGOs could take this approach, as could a developer that feels disadvantaged by spatial planning proposals. The judgements made in SA, however, are more immune to technical challenges: politically agreed targets and stated expectations are less open to challenge on technical grounds than baseline data and science-based predictions. In the quotes above Nirex perhaps saw its interests faring relatively well in the context of SEA. In contrast Manchester Airport and the RDAs favoured the SA process, which is both more politically responsive in reaching conclusions, and more politically insulated from challenge to those conclusions.

2.2 The environmentalist case against "sustainability"

Strong integration of SEA into SA, as recommended by the RTPI, goes against the perceived interests of the environmental NGOs. For many environmentalists there are practical as well as epistemological benefits to looking at the natural environment directly and analysing it in natural science terms. The unknown may be uncovered, and findings can be presented in a plausible, transparent, and to some extent verifiable format. Moreover the findings can be geared towards informing future management decisions, for environmental ends. Compliance with the European Habitats Directive demands a form of "appropriate assessment" (AA) that is more "rigorous" in these scientific and management terms than SEA. SEA, in turn, is seen as more rigorous than SA.

The NGOs and English nature display a concern for the power of environmental assessment to assist their efforts to make a positive environmental difference through political action and management decisions. The process and findings risk being less well adjusted to their requirements when translated for presentation as part of a wider process, particularly presentation alongside expert judgements on social and economic objectives. Politics "informed" by SA is more likely to find and make trade-offs at the expense of the natural environment. Integrating SEA into SA could be interpreted a victory for political agendas that deny a specifically environmental imperative to sustainable development for the UK. These concerns tend to be downplayed in discussions of assessment methodologies, but the tensions are evident at the methodological level.

SEA, AA and SA have incompatibilities regarding the object analysed and purpose of assessment efforts. AA directs attention to a very specific nature conservation site, and the focus is on preventing any intervention that would compromise the site. It disallows the use of economic or social gains as a "trade-off" for environmental losses, other than in cases of overwhelming national need. SEA is less strongly focused on environmental limits, but also directs attention to the natural environment, through base-line studies and natural science approaches to impact prediction. It does not attempt to make trade-offs with non-environmental criteria: this is left to political decision-making. SA, however, is usually an "objectives-led" approach to assessment. Attention is focused on experts"

judgements on options in relation to those objectives. By drawing together these judgements and presenting them as assessment results, the approach encourages the identification of trade-offs (and perceived or real complementarities) between environmental, social and economic gains and losses.

In the government's consultation on its draft SEA regulations (ODPM, 2004) the Royal Society for the Protection of Birds (RSPB) and the Campaign to Protect Rural England (CPRE) expressed concern that SA might not prove to be a helpful framework for SEA. SA's breadth and generality poses a risk of less importance being attached to the environmental assessment. RSPB (2004) contended that "[w]hile the strength of sustainability appraisal is that it can provide a wider perspective, its weakness is that it can downplay effects on the environment relative to other aspects of sustainability, particularly economic issues". English Nature (2004) expressed the same concern regarding the effect on the assessments (AA) required in the Habitats Directive, if these were to be integrated into SEA: "There is a risk that in the absence of clear guidance, SEA assessment may be regarded as a substitute for the more rigorous requirements of the appropriate assessment, and resulting decisions could lead to the adoption of plans which would result in significant environmental effects on European sites." The procedural requirements of the SEA and Habitats Directives would ensure that the environmental assessments could not be changed radically in form. Nonetheless, the NGOs" and EN's objected to the risk of AA or SEA being downgraded if treated as a subset of a broader process, with negative consequences for environmental interests.

CPRE (2004) also expressed concerns about "the extent to which this will lead to environmental concerns being traded-off in the decision-making process. We have seen environmental concerns being sidelined on many occasions in the pursuit of short term economic benefit. Indeed it was the failure of decision-making to account properly for the short and long term environmental implications that was a stimulus for bringing forward a Directive on SEA." CPRE pointed out that the objective stated in Article 1 of the Directive is to "provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development". This locates their argument and SEA as part of the political project of "environmental policy integration". This discourse is more prevalent in EC politics than in the UK, where New Labour has downplayed the environmental imperative in interpretations of sustainable development.

3. SEA for sustainability trade-offs or for EPI

The government's draft guidance on "sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks" (ODPM, 2004) proposes that SEA requirements can be built in to a revised form of the existing SA process. It states that "At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations…Achieving sustainable development means meeting the following four objectives at the same time, in the UK and the world as a whole: social progress which recognises the needs of everyone; effective protection of the environment; prudent use of natural resources; and maintenance of high and stable levels

of economic growth and employment. No one of these objectives is more important than another." (p. 23). The stated objectives are from the UK government's 1999 sustainable development strategy "A better quality of life". Since they are equally important the guidance goes on to suggest a way in which the added importance attached to the environment through the requirements of SEA can be matched in assessing the economic and social consequences of a proposal, and using these to make the plan more "sustainable". In contrast to earlier versions of SA, it is suggested that statutory bodies with economic and social remits should be consulted on the scope of the appraisal and on relevant options. Moreover the predictions of economic and social outcomes should be based on evidence rather than bare expert judgement. The SA report and draft plan are to be subject to consultation with the public and statutory bodies, and information on how the consultation comments and SA findings have been taken into account must be published alongside the final plan. It also states that the significant effects of the plan should be monitored. These are all requirements in SEA, and their application to social and economic aspects is welcome in all respects, except that the overall conceptual framework is one that denies that the environment needs greater consideration and protection for UK development to be more sustainable.

This is in contrast to the environmental policy integration agenda to which the architects of SEA believed they were contributing. While the main development of the SEA Directive occurred primarily over the last ten years, its origins lie earlier in the debates in the mid-1970s on legislating for EIA. At the time there was considerable controversy , not least over whether project-level assessment was the best place to start, or whether plans and programmes would not have been a more effective and appropriate level for Community-wide action. However it was felt that development at the project level had a more direct impact in terms of distortion of competition than did plans and programmes and therefore more readily justified under the Treaty of Rome (Stuffman, 1979). Since then various non-mandatory approaches to environmental assessment of plans have been recommended, but environmentalists and the European Commission continued to push for SEA legislation. Its lengthy and tortuous gestation was due to political opposition on the part of many MS rather than any substantive practical or methodological problems (Sheate, 2003a).

Divorced from SEA, project EIA frequently serves only to appraise irreversible impacts, not to reduce or remove them from the start. Early SEA, however, is well paced to anticipate, and therefore help to avoid environmental problems. In fact it would be logical and not be too difficult in drafting terms to link EIA and SEA by amending the 1985 EIA Directive (Cerny and Sheate, 1992; Sheate, 1994). However politically this was seen as too great a leap to be achieved at once and the Commission was at pains to keep the draft SEA Directive completely separate from amendments to the EIA Directive during the 1990s. Early drafts, applying to policies as well as plans and programmes, were under discussion within the Commission in 1990-91, only to be abandoned at the Edinburgh Summit at the end of 1992 due to a UK veto (Cerny and Sheate, 1992). The Commission resurrected the idea a couple of years later and consulted on a draft in the summer of 1995, by this time with application to policies removed from the proposal. Internal

Commission agreement on a revised version of this proposal was reached in 1996 (CEC, 1996).

This proposal sat rather at odds with the spirit of earlier drafts, since it was not only restricted to plans and programmes, but rather more obscurely to "town and country planning". This resulted in a very narrow definition of plans and programmes, and some confusion since town and country planning has a very specific legislative context in the UK which is not necessarily the same as land use and spatial planning elsewhere in the European Union. This may have been an attempt to appease the UK, which had continued to object to a formal SEA Directive. In its agreed form it would have had little impact in the UK, but nonetheless the Conservative UK government at the time continued to resist the legislation. The proposal came before the European parliament for its first reading in October 1998, resulting in an amended proposal for an SEA Directive in 1999 (COM (99) 73 final). The proposal extended to spatial and land use planning and transport, and for the first time mentioned sustainable development as an objective in the preamble. By December 1999 the Environment Ministers of the 15 MS had reached political agreement on a common text for the future Directive, and amendments were proposed by the European parliament in 2000. Disputes over these between the Council and the Parliament, for example over whether SEA should apply to Structural Funds, were addressed in a Conciliation Committee early in 2001. Application to structural funds, which include the Common Agricultural Policy, was a key demand for the environmental NGOs. It was included, but not for the current programming rounds of 200-2006/7. The SEA Directive (EC, 2001) was agreed in June 2001 and came into force in July 2004.

4. Discussion

Over SEA's 30 year gestation period the emphasis in environmental policy has shifted from environmental protection to environmental integration, and on to sustainable development. That contextual change has not been a linear, progressive one. Indeed it might be viewed as "coming full circle" in returning to the days when strong environmental protection measures were being challenged by demands for economic growth. The SEA Directive has been a significant achievement for EPI, consistent with the ongoing "Cardiff process" (CEC, 1998), but needs to be seen against the backdrop of the recent dominance of the economic and social agendas of the "Lisbon process". The latter aims for the EU to "become the most competitive and dynamic knowledge-based economy in the world, capable of sustainable growth with more and better jobs and greater social cohesion (EC, 2000). It, rather than the Cardiff EPI process, headlines the EU's Sustainable Development Strategy (CEC, 2001), which, remarkably, avoids use of the term "environmental integration" altogether. Moreover it contains a very weak interpretation of the environmental dimension of sustainability: " Achieving this [sustainable development] in practice requires that economic growth supports social progress and respects the environment, that social policy underpins economic performance, and that environmental policy is cost-effective" (CEC, 2001, p. 2).

A review of the Lisbon process in 2004 prompted EU business associations Unice, Eurocommerce and Eurochambres to call for *more* concrete proposals on boosting competitiveness. Unice stated "[s]ocial cohesion and environmental ambitions are only

possible in a growing economy" (ENDS Daily, 2004). The adoption of the SEA Directive, therefore, emerging as it did out of a strong historical environmental integration agenda, provides an important counterpoint to the continued weakening of the conception of sustainable development elsewhere in EU policy (Sheate, 2003b). However the integration of SEA into sustainability appraisal in the UK is consistent with the UK government's reluctance to promote SEA, and with the ongoing capture of the concept of sustainable development as an essentially economic agenda.

This paper underscores the multiple meanings associated with "integration" in discourses surrounding *ex ante* assessment and environmental policy, and the clear potential for some of these to conflict with the aims of EPI (Scrase and Sheate, 2002). "Integration" is symbolic of ideas of agents and agendas coming together to overcome disunities, and of a more holistic perspective, and thus appears progressive. It is a useful term for promoting a range of disparate and conflicting agendas. It is very like "sustainable development" itself in this respect: everyone thinks it is a good idea and hopes to turn it to their own purposes. However for many environmentalists the underlying conflicts in industrialised nation development have not been tackled, so the issue cannot yet be one of "balance". The sheer size and expected growth of the UK economy, and all the construction, production and consumption that entails, is seen as a direct threat to ecological sustainability in the UK, and to global sustainable development in terms of international justice and climate change. SEA was conceived in the spirit of EPI, but must operate in a high level policy context that is dominated primarily by concern for economic growth, and to which it is excluded from operation in the UK and EU policy arenas. (The experience with SEA of policies in Scotland is a subject for further research).

That SEA is to be "integrated" into SA in this context suggests that its contribution to EPI will be diluted. The weaker the underlying conception of sustainable development, the more SA is likely to legitimise implementation of policies that many would consider unsustainable on environmental grounds. This risk has been checked to some extent by SEA now having a basis in law, and it therefore cannot evolve so freely. SEA cannot be compromised significantly so the UK the response, to maintain "balance", has been to suggest that assessment of the economic and social impacts of proposals should be handled in similar ways to environmental impacts. SEA was conceived as a means to drive forward greater concern for the environment in public policy, so replicating its procedural requirements in relation to economic and social impacts will lend additional advocacy for those agendas. However in many respects making SA more like SEA is a laudable suggestion, and further research is needed on the application of SA under the new guidance to reveal how it influences assessment practice, and the extent to which the EPI function of SEA becomes diluted.

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