…Rationality and SEA…

Effective tiering – useful concept or useless chimera?

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Abstract

Recent years have seen the emergence of a critical and, at times, dismissive literature on the rational foundations and elements of SEA. Based on ideas brought forward in the policy analysis and planning literatures over the past decade, it has been suggested that SEA needs to be more flexible, communication driven and oriented towards consensus building and joint learning. As a consequence, attempts to rationalise decision making with the help of SEA, for example through systematic tiering, now appears to be perceived by many as a 'useless chimera'. In this paper, it is suggested that whilst a lot can be learned from considering the ideas brought forward by SEA related disciplines, it is premature to entirely abolish rational SEA elements. It is concluded that a reconciliation of 'flexible' and 'rational' elements, which needs to be informed by empirical evidence might be the best way forward. In this context, distinguishing between different SEA types according to the decision tier (for example policy, plan and programme) is suggested to be particularly helpful.

Introduction

Up until recently, systematic environmental assessment tiering in public, and at times private decision making was widely perceived as an important building block for an effective consideration of environmental aspects. This did not only include tiering between projects (including EIA) and higher tiers of decision making (including SEA), but also between various higher tiers of decision making and associated SEAs. Using terminology originally introduced by Lee and Wood (1978), these tiers have frequently been referred to in terms of policies, plans and programmes (PPPs). Ultimately, if done in a systematic and logical – ie 'rational' – way, effective planning[1] and environmental assessment tiering were considered capable of helping actors to address the right issues at the right time, thus leading to more rigorous and systematic decision making. As a result, not only were environmental aspects thought to be more effectively considered, but planning itself was deemed to become more systematic and ultimately more transparent.

Whilst SEA tiering, particularly in sectoral planning, has been discussed by a range of authors (see Fischer, 2000, Jansson 2000, Brokking et al, 2004, Marshall and Fischer, 2006), it is probably fair to say that lately, the concept has fallen somewhat out of favour with an SEA community that is increasingly influenced by post-modern policy analysis and communicative/collaborative planning ideas. In this context, opinions that 'real planning processes' are non-rational and the idea that communicative planning, joint learning and consensus building are going to 'save the day' are now widely held. Many of those writing on SEA, in particular many social scientists now appear to

[1] Subsequently, in this paper, 'planning' will be used as a generic term, including policy, plan, programme and project making

perceive attempts to trying to structure processes in a rational way as a futile and pointless exercise and EIA based SEA approaches are now clearly out of fashion. In this context, it appears tht suggestions regarding systematic tiering of SEA are perceived by many as a 'useless chimera'.

In the face of the current criticism, and based on a conviction that 'EIA based SEA' still has an important role to play in supporting environmentally sustainable decisions, this paper aims at defending structured and tiered approaches to SEA, at least in certain situations of application. Whilst it is not the intention of the author to dismiss the ideas brought into the SEA arena by those referring to the policy analysis and planning literatures, the move by some towards entirely abolishing rational elements in SEA application in favour of flexible, communicative and consensus oriented approaches is considered to be premature. Whilst there can be no doubt that a lot can be learned from related disciplines, it is important not to forget that traditionally, SEA has served a different function from policy analysis and planning, particularly in terms of supporting a more effective consideration of environmental aspects in strategic decision making. Therefore, rather than simply transferring ideas directly to SEA, it is suggested that the main focus should be on finding ways for reconciling traditional SEA thinking which is based on the use of structured, rigorous and rational elements with the emerging thinking on flexibility, communication and consensus orientation.

Traditional SEA thinking is, at least partly, based on project EIA elements. In this context, it is important that the notion 'EIA based' should not be interpreted in terms of what is sometimes made of this decision support instrument, opposite to its original intentions, ie a technical report which is incomprehensible to many actors and a process that is largely ineffective, because of an ex-post, rather than ex-ante application. Rather, 'EIA based' should be understood in terms of pro-active decision support, helping to structure decision making in a rigorous manner and leading to more environmentally sustainable decisions.

In order to make the case for not prematurely abandoning rational elements, firstly this paper aims at formulating a reply to the criticism recently brought forward regarding rational SEA elements, such as SEA tiering. Secondly, problems connected with newly emerging paradigms of flexibility, communication, consensus oriented approaches and joint learning are highlighted. In this context, the following eight aspects are addressed:

(1) *Impact assessment serves a different function from planning and policy analysis:* Whilst SEA can undoubtedly learn from policy analysis and planning debates on flexibility, communication, collaboration, consensus-building and joint learning, to date not much thought has been given to the fact that impact assessment serves a different function from policy analysis and planning and that not all findings may be directly transferable from one area to the other.

(2) *Systematic EA tiering is a prerequisite for decision making for sustainable development*: It is argued that current global environmental problems need structured and systematic approaches to decision making and assessment; leaving decision making entirely to local communities in communicative processes may mean environmental sustainability problems are not effectively considered in planning, at lest those that are of a non-local, global nature.

(3) *Effective tiering does exist in current planning and assessment practice*: It is suggested that opposite to what has occasionally been claimed, there is evidence that effective tiering is happening in many well established planning systems.

(4) *Practice examples provided by those critical of tiering are often 'exceptional', rather than 'normal' cases:* It is suggested that the practice examples provided by those who attempt to show that effective tiering does not exist are often strategic projects of international importance, rather than 'normal' planning cases.

(5) *The failed promises of communicative planning*: It is argued that to date, communicative planning has not been able to deliver its promises; whilst it appears to be able to lead to a 'right of voice', it does not seem to result in any real power for those representing 'weaker' planning aspects, such as environmental issues.

(6) *No practical alternative approaches have yet been proposed*: It is suggested that even those rejecting structured and rational approaches appear to come up with EIA type process solutions if asked to develop alternative views on how to guide decision makers, planners and assessors.

(7) *'Show me how to do it' – the need of practitioners for clear and systematic guidance:* It is argued that decision makers, planners and assessors need practical guidance, which needs to revolve around structured frameworks; whilst subsequent planning might deviate from these frameworks, they do provide for useful guidance on ex-ante assessment.

(8) *Those advertising flexible and communicative approaches do not distinguish sufficiently between different types of plans and planning system*: It is suggested that whilst in certain situations flexible and communicative approaches may well be the way forward, in others structured, EIA based elements may support effective assessment. However, in the current debate, frequently, no proper distinction is made between different situations of SEA application.

This paper is divided into 10 sections. Following this introduction, each of the eight aspects introduced above are discussed. Finally, an outlook is provided and conclusions are drawn.

Impact assessment serves a different function from planning and policy analysis

When considering ideas and findings from the policy analysis and planning literatures, it is important to be aware that different instruments have different functions. In this context, what makes SEA distinct is its role as an advocate tool for the environment. SEA was originally introduced due to a perceived 'weak' representation of environmental aspects in policy, plan and programme making. SEA's purposes can be said to include (Wiseman, 1997):

- to provide input on environmental and sustainability issues to planning
- to reduce the number and complexity of project EIAs
- to assess cumulative impacts and identify sustainability indicators

Referring to environmental assessment in a general manner, Elling (2003) distinguished between 'political' planning processes and the 'rational deliberation' of assessment. Therefore, to date, an important rationale for applying SEA has been to avoid the incrementalism often observed in planning (see eg Lindblom, 1959) and to act as an 'action-forcing' instrument for 'reorientation of planning and decision making' (Caldwell, 1982). Furthermore, environmental assessment has been understood to be a support mechanism for moving towards achieving objectives rather than moving away from problems (Meyer and Miller, 1984). Therefore, if 'SEA is to be effective and receive widespread acceptance', a structured methodological approach is needed (Noble and Storey, 2001). Evidence that structured EIA process based SEA can be effective in leading towards a better consideration of the environment, at least at plan and programme levels of decision making has been provided by various authors (DHV, 2001; Fischer, 2002; Verheem, 2004 and Peterson, 2005).

Systematic EA tiering is a prerequisite for decision making for sustainable development

It has lately been argued that decision making for sustainable development means communicative, local community driven planning should be pursued, because local communities need to determine their own fate and local solutions are to be found. However, whilst this may satisfy a particular *ideological* view on planning in support of sustainable development, it is potentially at odds with a *substantive, outcome oriented* understanding, at least with regard to global environmental problems. In this context, if we accept that, for example, global climate change is happening and that this requires action at all levels of planning, the need to reduce CO_2 emissions has to be reflected at every planning stage, possibly by taking concrete targets for reducing emissions into account consistently throughout the planning hierarchy. If there is no clear understanding at the start of a planning process of where action is required, it is impossible to see how concrete

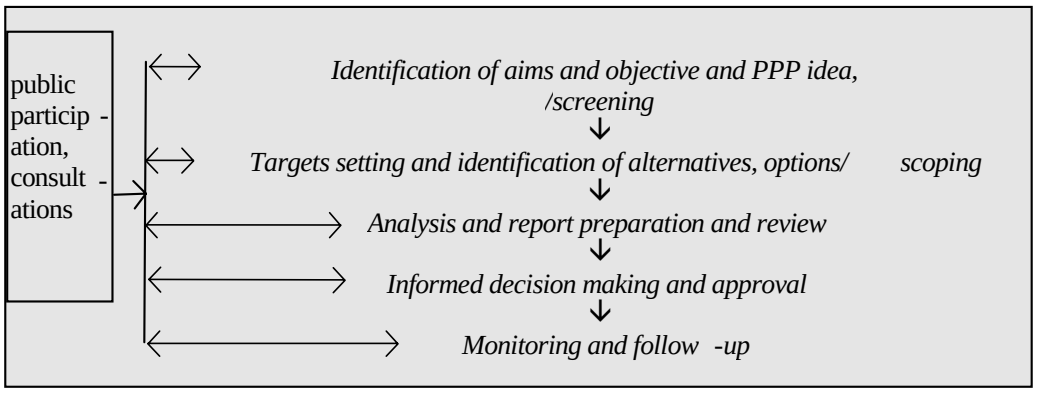
environmental problems are supposed to be tackled. There is no evidence that purely relying on communicative approaches, which in effect means applying a 'bottom-up' approach to planning, is going to achieve the desired outcomes. As there is evidence that local communities often have Not-In-My-BackYard (NIMBY) and Locally-Unwanted-Land-Use (LULU) attitudes and tend to subordinate environmental values to economic ones (following Peterson's 1981 theory on redistributive policies), more top-down oriented approaches are likely to be needed, particularly in terms of implementing environmental sustainability objectives and targets.

Our current understanding of what decision making in support of an environmentally sustainable development means is based on a rational approach to tackling the problem, as is reflected in the following procedural steps (following Sheate, 1992; Fischer, 1999):

(1) the problem is identified
(2) objectives (and possibly targets) are formulated for tackling the problem
(3) possible options for action are identified that might lead to meeting targets
(4) options are assessed in terms of their various impacts and a best option is chosen
(5) the best option is being implemented
(6) conformance and performance is being monitored

These stages are reflected in an EIA based SEA process which is summarised in Figure 1. That there is actually a statistically significant relationship between the extent to which these procedural stages are covered and the extent to which sustainability aspects are considered was shown by this author in 2002 (Fischer, 2002). Looking at 22 SEAs, a statistically significant correlation of both aspects was found. To date, there have not been any concrete suggestions for alternative approaches and it is currently unclear how, in the absence of clear objectives and targets and in the presence of flexible approaches, environmental sustainability can be effectively considered in decision making.

Figure 1: Decision making for sustainable development and EIA based SEA.



Source: Dusik, Fischer and Sadler, 2002

There is effective tiering in current planning and assessment practice

Opposite to what has lately been suggested, there are a number of planning and assessment systems where tiering is in place. This particularly includes well developed planning systems, such as those found in the Scandinavian countries, Germany, the Netherlands and the UK (Fischer, 2004). Before presenting a range of tiering examples, it is important to clarify what effective tiering, particularly at strategic planning levels actually means. In this context, Wallagh's (1988, 122-123 in Faludi, 2000, 310) definition of strategic plan making effectiveness provides a suitable starting point. He suggested that strategic plan making can be considered effective, if:

- 'an operational decision *conforms to the plan* and *explicit reference* is being made to it, demonstrating that conformance has not been accidental
- arguments are being *derived from the plan* for taking non-conforming decisions, ie *departures are deliberate*
- the plan provides the basis for *analysing consequences of an incidental decision which happens to contravene the plan*, thus bringing that decision under the umbrella of the plan
- if and when departures become too frequent and the plan must be reviewed, the original plan may still be said to have worked for as long as the review takes that *plan as its point of departure*'.

Translating this to SEA, it may be said that tiering can be considered to function effectively, as long as explicit reference is made to it in PPPs and projects, even if subsequently there is – deliberate – derivation from it. In this context, Hironaka and Schofer (2002) suggested that characterising a policy as 'failed if there is no tight causal link between policy and outcome is simplistic and unhelpful', and that other outcomes such as clear agenda setting for environmental protection in environmental assessment and an increased environmental awareness resulting from environmental assessment are just as important. It is also important to acknowledge that effective tiering may not necessarily mean that there is a strict top-down hierarchy of decision making. Taking transport planning in Europe as an example, based on current evidence, tiering works in different directions and may take the following forms (Fischer, forthcoming):

(1) A national government with its transport ministry is the main driver for national transport infrastructure planning and the planning system works in a top-down manner of decision making:
    a. proposals for potential projects are the result of careful policy, network, corridor and programme evaluations,
    b. proposals are the results of suggestions from, for example, regional and local authorities, industry or other interest groups and the transport ministry attempts to reconcile its own policy and network ideas with these proposals.
(2) The national government with its transport ministry mainly acts as collector of project ideas from local and regional administrations or other bodies; these are retrofitted through a transport programme into the planning system, ie the system works in a rather bottom-up manner of decision making
    a. The national government has an overall vision for the development of transport infrastructure which sets the framework for the selection of the most suitable projects
    b. Projects are chosen largely based on financial considerations; in this context, benefit-cost analysis is likely to be a key assessment technique
(3) The regional level acts as the main driver for long-distance transport infrastructure planning with the national level taking on a co-ordinating role between the different regions within a country

Other forms of transport planning and associated tiering or hybrids of the above may also be possible. Subsequently, six examples for planning and assessment tiering are presented. These include three examples where effective tiering is evident. Furthermore, three cases are presented where an intention to effectively connect different planning tiers is evident. The first group includes the German Federal Transport Infrastructure Plan, the Dutch National Transport Plan and transport planning in the Czech Republic. The second group includes the UK spatial planning system, transport planning in the Italian Province of Trento and transport planning in Sweden.

The German Federal Transport Infrastructure Plan (FTIP, Fischer, 2002a): This is a national transport plan, which lists hundreds of potential federal road, railway and waterway projects. Projects are sub-divided into various categories, ranging from immediate/urgent need to further need. The last FTIP was devised in 1992, which was subsequently updated in 2002. Whilst not all of the projects included in the FTIP are implemented straight away, there are basically no federal transport projects that do not previously appear in the FTIP, ie tiering is in place and the FTIP clearly does set the baseline for subsequent projects. The FTIP is subject to an 'ecological risk assessment' and an integrated benefit-cost analysis, including environmental aspects. Both approaches are the basis for formal SEA application.

The Dutch National Transport Plan (SVVII, Arts, 2005): Similarly to what has been described for transport planning in Germany, a precondition for projects to be brought forward and be implemented is the previous inclusion in the national transport plan (SVVII, 1990). Environmental aspects are considered in the national transport plan based on an assessment of the environmental impacts of transport policy.

Transport planning in the Czech Republic (Zdrazil and Martis, 2001): Based on what has been reported on in the literature, the Czech Republic pursues a centralised top-down national infrastructure planning approach, with central government making project proposals, based on various strategic considerations and subsequently driving proposals forward. This means there is a strictly tiered transport planning system in place in the Czech Republic. The National Roads Plan had been subject to an SEA.

The new UK spatial planning system (Jones et al, 2005): Effective tiering is at the heart of the new planning system, introduced in 2004. Regional spatial strategies need to be effectively tiered with local development frameworks that include 'core strategies', 'site specific allocations of land' and 'area action plans', all subject to SEA. Each of these tiers is supposed to address different issues within a tiered planning hierarchy.

Province of Trento – guidelines for preparing an environmental report (Diamantini and Geneletti, 2004): These SEA guidelines are based on a tiered assessment system's approach, consisting of five main stages. Indicators from existing policies and strategies are identified at the 'framing the context' stage. Objectives are to be assessed in terms of consistency with sustainability principles, as specified in the 'Act on Sustainable Development'. Alternative strategies are to be assessed, based on which groups of action (ie projects) are to be derived, assessed and monitored. Whereas guidelines have been applied to the Trento mobility plan, leading to the consideration of solutions in a hierarchical/tiered manner, the main problem so far has been a lack of consistent and implementable sustainability objectives and targets.

Transport Planning in Sweden (Brokking et al, 2004): Transport planning and assessment in Sweden has been portrayed to fall into various distinct tiers. These include transportation policies, regional transport plans and transport action programmes. There are examples for planning documents prepared at the three tiers, for example national transportation policy, the regional Skåne transport infrastructure plan and national infrastructure programme.

Practice examples provided by those critical of systematic tiering are often exceptional, rather than 'normal' cases

To date, only few examples have been identified in the professional literature in order to show that tiering is either not happening or ineffective. Whereas this author does not intend to dismiss these cases, it is interesting to note that all of them appear to fall into the category 'big projects of international importance', including, for example, major motorway and railway projects, bridges and tunnels. The choice of these rather 'exceptional' examples gives rise to some scepticism as to whether they do indeed 'prove the case'. In this context, authors have mentioned, for example, the Dutch 'Betuwe' railway line between Rotterdam harbour and the Ruhr area in Germany (Arts et al, 2005) and the Copenhagen to Malmö bridge between Denmark and Sweden (Marcus, 2005). Another project that would fall into the same category includes the Channel Tunnel between the UK and France. It appears somewhat questionable whether these projects have indeed been developed in a more or less isolated manner without previous strategic considerations, as has been implied. The necessity for a 'betuwe' rail link had been discussed first during the 1980s. Subsequently, it was mentioned in the Dutch 'Second Transport Structure Plan' of 1990. Plans for the Copenhagen-Malmö link date back to the beginning of the 20th century. Since then, the idea had been included in a range of strategic planning documents. Plans for a tunnel between the UK and France had in effect been in existence for several centuries.

The failed promises of communicative planning

The debate we are currently witnessing on the most appropriate application of SEA closely follows similar debates in the policy analysis and planning literatures, however lagging several years behind those. Current lines of arguments are particularly influenced by what had been said on communicative and flexible planning in the mid-1990s, for example by Innes (1995) and Healey (1996), based on the thoughts by Habermas on 'communicative action' (1981). In order to avoid reinventing the wheel and also for catching up with related disciplines, at this stage it is particular important to look at the discussions that followed the introduction of those ideas. In this context, reference may be made, for example to an article by Tewdwr-Jones and Allmendinger from 1998 on the 'failed promises of communicative planning'. The two authors observed that proponents of communicative planning believe that people inevitably search for and accept *rational* arguments in open and fair debates. Consequently, policy, plan and programme making would need to develop as an arena for conversation among equals in what is called an 'ideal speech situation', marked by an absence of power and an acceptance by all participants of rational arguments. However, in this context, Tewdwr-Jones and Allmendinger criticize that, based on the evidence obtained so far, it appears impossible to create discourse spaces that are free of power (following Foucault, see, also Richardson, 1996). Furthermore, they provide evidence that where communicative planning and

consensus building were attempted, there had been a failure to translate agreed discourses into practical outcomes, citing cases in South Africa (Oranje, 1996) and the UK (Tewdwr-Jones and Thomas, 1998). Furthermore, they observed that 'at worst empowerment and consensus building attempts in planning may lead to a sclerosis of action' (Tewdwr-Jones and Allmendinger, 1998, p1977).

Further criticism towards the concept of communicative rationality has been raised, based on the observation that participation has an inherent tendency to organize, and to constrain, itself, thus doing the opposite of what communicative planners want. In a Finnish context, Mäntysalo (2001), for example, found that in relatively short time resident associations developed from ad hoc citizen movements into well-organized interest groups that had established their institutionalised positions in the local political systems. He concluded that most active members of committees and working groups acquired knowledge and power with other citizens loosing insight into what is happening. In addition, empirical studies found that the suppression of conflict in consensus-led debates and the 'consensus' emerging tended to particularly reflect the interests of the powerful and the powerless were left out (Atkinson, 1999). As a way out of this dilemma, it has been suggested that citizens need a system designed to regulate conflicts or prevent illegitimate practices or suppression of legal rights (Pløger, 2001). Whilst both, representative democracies and public involvement and participation in decision making represent systemic acknowledgements that societies consist of different values and discourses, they also represent a rationalisation of 'the pluralist democracy' that has to be regulated and governed in order to overcome the 'never ending' line of interests and interpretations. In this context, Larsen (1999) suggested that inclusionary planning rather leads to a 'right of voice' than to real power.

Finally, it is important to reflect on the idea that communicative planning means engaging in 'joint learning processes'. In this context, if we take transport planning as an example, it is doubtful whether this is realistic. Based on current evidence, to assume that, for example, the road building industry would happily sign up to building fewer roads in the interest of finding consensus solutions appears naïve.

No practical alternative approaches have yet been proposed

One aspect in particular should give rise for some caution towards prematurely abandoning 'traditional' systematic EIA based approaches to SEA, namely the lack of alternative approaches. In this context, it is somewhat surprising to note that even those that are critical of EIA-based SEA still tend to suggest similar procedural stages as those present in current 'rational' impact assessment, if asked to identify practical approaches (see, for example Tonn et al, 2000 and

Nielsson and Dalkmann, 2001). These normally include stages such as 'specifying the issue' (ie *screening*), 'goal setting' (ie *scoping*), information collection, processing and alternatives consideration (ie *assessment*), decision making and implementation. In the absence of other alternatives being proposed, particularly in the interest of not confusing practitioners and decision makers, EIA based SEA processes should therefore not be abolished.

'Show me how to do it' – the need of practitioners for clear and systematic guidance

The previous paragraph raised some concerns regarding creating confusion among practitioners and decision makers in the light of not having any alternative approaches in place. In this context, one aspect which has not received sufficient attention in the current debate is the need of practitioners for simple and easy-to-understand guidance. 'Show me how to do it' is probably one of the most frequently heard requests of SEA trainers and there is a need for simple, practical and logical SEA frameworks. Furthermore, it is important to stress that practitioners are clearly interested in the outcomes of processes, which is opposite to what many of those advertising flexible, communicative/ collaborative planning would consider important. An example for the appeal of rational and tiered approaches to SEA/EIA to practitioners and decision makers was provided by Marshall and Fischer (2006), looking at regional energy transmission planning and SEA in the electricity company ScottishPower. In this context, the rational and tiered methodological framework for SEA was said to have made rational sense to in-house personnel and senior management unfamiliar with the concept and practice of SEA. Subsequently, the suggested tiered approach to SEA was accepted as practical and desirable.

Those advertising flexible and communicative approaches do not sufficiently distinguish between different types of plans and planning systems

A somewhat 'broadbrush' approach appears to be prevailing in the current debate on how to conduct SEA effectively. Clearly, insufficient consideration is given to different situations of SEA application. In this context, there is a need to distinguish more clearly between situations in which flexible approaches may be appropriately applied and those in which rational elements may be more helpful. This distinction may be related to three aspects that have a direct bearing on the tasks to be addressed and ultimately on the role the assessor may be playing in SEA. These include:

a. The extent of conflict arising in a particular situation
b. The extent of necessary communication in the PPP process
c. The extent of clear scientific knowledge in a particular situation.

In order to develop a better understanding of the particular decision making situation, the three main strategic stages in an administration-led decision making hierarchy – policies, plans and

programmes[2] - may be used as a basis for distinguishing between different decision making approaches, as follows (Fischer, 2003):

1. Policies: negotiation decision making approaches
2. Plans: quasi-rational decision making approaches
3. Programmes: quasi-rational decision making approaches

In policy situations (including visioning), negotiation may be a predominant feature, as conflicting goals are likely to be present and the issues under consideration are likely to be of high political content. In this context, flexibility, communication and consensus building and joint learning are aspects that are likely to be greatly important. In plan situations, goals are of a less conflicting and diffuse nature and the process deals largely with issues of professional content. A more rational approach may therefore be pursued. The same is the case in programme situations, as the substantive issues under consideration are likely to be subject to regulations, low political and high professional content.

In addition to the different planning tiers, the planning system within which SEA is applied may also play an important role. In a European context, for example, Gazzola and Fischer (forthcoming) found that it may be possible to distinguish between various groups of countries, representing distinct planning traditions. In the Scandinavian and North West European countries, for example, planning and environmental assessments appears to be happening in a distinctly different manner from the Mediterranean countries. Whereas in the first group of countries, more formalised procedural approaches are frequently followed, in the second group, political negotiations are often found to be of paramount importance.

Conclusions and outlook: refocusing the current debate on how to apply SEA appropriately and effectively

This paper has shown that problems exist with flexibility, communication/ collaboration, consensus orientation and joint learning in SEA, which has recently been brought forward based on ideas formulated in the policy analysis and planning literatures. Whilst it has been acknowledged that ideas of related disciplines can undoubtedly help to make SEA more effective, based on the different functions of SEA, planning and policy analysis, and based on the current lack of empirical evidence, the paper has called on applying a more cautious approach towards giving emerging ideas priority over established SEA approaches which are based on rational ideas, such as effective tiering. Rather, new ideas should be carefully screened in terms of how they can be used to support SEA's main rationale, in order to ensure adequate consideration of environmental aspects in strategic decision making. There are some indications that the best way forward may be to

[2] For an in-depth description of policy, plan and programme tasks see Fischer and Seaton (2002) and Jansson (2000); see also the earlier works of Riehl and Winkler-Kühlken (1995) and Lee and Wood (1978)

reconcile emerging approaches with the more traditional 'rational' EIA based ones, and to distinguish between different situations of application. In this context, a distinction of different tiers, such as policies, plans and programmes appears to be useful. Furthermore, regional differences might play an important role in deciding on what approach to take.

In order to better appreciate the implications of suggestions made by different authors, there is an urgent need to make the assumptions and the thinking underlying them clearer. In this context, we need to acknowledge that the current debate is influenced by authors coming from a wide range of different policy and planning traditions and from different planning cultures and countries. Consequently, authors are unlikely to talk the same language, based on which confusion may arise. However, to date, rather than making the basis for individual judgments and proposals clear, what appears to have happened is that generalistic views are being formulated that may well be valid in some, but not necessarily in all SEA systems. Furthermore, the inconsistent use of terminology still appears to be in the way of developing a better understanding of the issues at stake.

Based on the arguments brought forward in this paper, it is concluded that systematically structured planning procedures still hold great promise for environmental assessment at strategic levels of decision making. In this context, the distinction of different SEA tiers may be the key for improving SEA performance. Applying purely communicative, flexible and consensus driven approaches to SEA could actually conflict with the ethical principles of conventional and sustainable development planning (in this context, see also Verma, 1996). Furthermore, it is important to note that to date, communicative planning theories have not gone much further from offering ideals of planning dialogue and, unfortunately have largely failed to provide the desired consensus in decision making procedures.

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