

Environmental Planning and Policy Seminar

1. What are the main arguments for a communicative approach?
2. Is value conflict important in the policy process? Why?
3. Are the opinions of society significant in the assessment of EA?
4. What are the main contributions of the case studies used? How do they compare?

Environmental Impact Assessment Review

Volume 25, Issue 4, May 2005, Pages 341-365

Environmental assessment and planning theory: four short stories about power, multiple rationality, and ethics [☆]

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Received 1 February 2004; revised 1 September 2004; accepted 1 September 2004. Available online 23 November 2004.

Abstract

This paper engages with recent debates in the environmental assessment (EA) literature about the lessons that can be learned from planning theory. It argues that the current communicative turn in EA, echoing a similar shift in planning thought in the 1990s, has failed to benefit from this earlier experience. Instead of following this trend, the paper examines EA from a perspective which is more closely aligned with some of the critics of the communicative approach, and which combines concepts of power, rationality, value and ethics in a different way. First, the paper briefly sets out how planning theory has engaged with these concepts. It then argues that EA needs to engage with competing multiple rationalities, and the inescapable presence of value conflicts within EA. It then turns to recent debates in EA to show how the question of value has become a very difficult issue for EA theorists. These issues are then explored by looking at four cases where environmental impact assessment (EIA) and strategic environmental assessment (SEA) become dramatic sites of struggle, in very different ways: where the boundaries between facts, boundaries, and opinions are defined through power struggles; where SEA is used as a process of brokerage between a fragile coalition of interests; where power defines rationality in the construction of an SEA instrument; and where EIA is challenged from the outside by civil society. The paper closes by discussing how EA practitioners can operate reflexively and ethically in a world of contested rationality.

Keywords: Environmental impact assessment; Strategic environmental assessment; Planning theory; Power; Rationality; Value; Ethics

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1. Introduction

This paper reflects on recent debates in environmental assessment (EA) literature from a particular planning theory perspective. Rather than seeking to import 'lessons' from planning theory, the aim is to try and 'see' EA through the eyes of planning theory. This is a slightly different way of drawing connections between planning and EA—instead of advocating solutions to procedural dilemmas, for example, the idea is to see if these dilemmas might be thought about differently if they were addressed in the ways that some planning theorists have thought about planning. Can problems of participation, expertise, value, and rationality in EA be unpacked differently, so that we can better understand the nature of the debate we are in?

Despite brave attempts (e.g., [Lawrence, 2000](#)), I do not believe that planning theory is a field that can be assembled into neat typologies, with the contributions of various theoretical approaches set out in an overview paper for synthesis and 'downloading' into a related area of practice, such as environmental assessment. It is necessary, rather, to engage in more detailed exploration of the issues that are raised by particular theoretical approaches, so that the potential contributions can be handled sensitively. Lawrence argues that EIA has missed out by failing to engage with planning theory:

The limited and sporadic interaction between EIA and planning theory has meant that EIA has largely failed to benefit from planning theory insights and lessons. Obstacles and dilemmas already encountered and addressed in planning theory are still hampering EIA theory building and practice. ([Lawrence, 2000](#), p. 307)

Looking to experience in planning, then, might help in providing insights into some of the conceptual problems faced in environmental assessment.

Rather than attempt to present a purely theoretical argument, I want in this paper to draw both from theory and from practice. I believe that theoretical development has a lot to learn from practice (and from practitioners and other participants) and that theory is relevant to practice (contrary to the views of some planning academics and practitioners). This follows a broader argument that we should practice to test whether theory is proving helpful. This does not necessarily mean that theory 'works' when it makes life simpler or smoother, but when it helps us to be usefully critical (rather than generally cynical) and appropriately positive (rather than naively optimistic; [Richardson, 2002](#)).

I am motivated to write this paper because there seems to me to be a problem in the progress of the theoretical debate around EA. It seems that the conceptualisation of EA is braced to go through a major change, reflecting a similar shift in planning theory in the 1990s. What has been described as the communicative turn in planning seems to be repeating itself in EA. The reason this parallel experience is worth bringing to the attention of the EA community is that the communicative turn, whilst bringing about a lasting change on the way we understand planning, did not decisively create the new paradigm that at least some of its proponents intended (e.g., [Innes, 1995](#)). The central theoretical concern with rationality in planning that the communicative turn sought to resolve remains disputed.

Whilst in agreement that there are insights to be learned from planning theory debates, and recognising that the communicative turn has a lot to offer, we should also acknowledge that planning theory remains a field of struggle between competing perspectives. The development of planning theory has not been about the adoption of a central paradigm, but about the gradual emergence of a more contested territory, where overarching theories have failed to convince the academic community that they are as universally relevant as they might claim. Planning continues to make do with a wide range of parallel (and not so parallel), incompatible, and competing theories. Theories (and theorists) do not see the world in the same way and fail to agree on theoretical explanations of what is happening in the world, on the significance of various 'happenings', and on what to do about them.

So I want to look at EA not from the perspective of communicative planning theory, but from a perspective which is more closely aligned with some of the critics of this approach. The arguments in this paper, then, draw from planning theoretical debates which address questions of power, rationality, and value, rather than attempting to review or distil lessons from a much wider field of substantive and procedural planning theory (reviewed, for example, in [Lawrence, 2000](#) and [Allmendinger, 2001](#)). The argument is structured as follows. First, I very briefly set out how planning theory has engaged with questions of power, rationality, and value. I then suggest that EA needs to engage with competing multiple rationalities, and that value conflicts and judgements about them are inescapably present in EA. I explore recent debates in EA to show how the question of value has become a very difficult issue for EA theorists. These issues are then explored by looking at four cases where environmental impact assessment (EIA) and strategic environmental assessment (SEA) become dramatic sites of struggle, in very different ways: where the boundaries between facts, boundaries and opinions are defined through power struggles; where

SEA is used as a process of brokerage between a fragile coalition of interests; where power defines rationality in the construction of an SEA instrument; and where EIA is challenged from the outside by civil society. From these illustrations, it becomes clear that a shift of theoretical perspective is required. In addition, it is here that the paper moves to its close, discussing how EA practitioners can operate in an ethically reflexive way in a world of contested rationality.

To do this, I will use illustrations drawn from a combination of personal involvement in some EA processes, and critical analysis of others, drawing from interviews with planners, politicians, and consultants in a range of research projects. The cases, in different ways, are used to argue that the uses to which EA is put in the real world require a clear acknowledgment of the inescapable relationship between power and value. More particularly, they show that claims that values can somehow be separated from the EA process, or indeed that it is possible to treat these values in an apolitical way within EA, do not correspond with the reality of practice.

Before going further, I should also clarify the position from which I engage with EA debates. I have previously coauthored an article published in this journal, which detailed how local environmental nongovernmental organisations (NGOs) could create serious difficulties for EIA processes by opening up 'parallel' opportunities for public participation where the existing structures and processes were weak ([Richardson et al., 1998](#)). Moreover, the result of parallel public participation was that EIAs were adjudicated as being deficient or inadequate. Elsewhere ([Richardson, 1996](#), [Richardson, 1997](#) and [Jensen and Richardson, 2004](#)), I have tended to look rather critically at how power shapes knowledge, and how power defines rationality in planning. I am not particularly 'for' or 'against' EA, rather I see EA as an inevitable site of conflict in the wider struggles for domination over planning and policy decisions, and over how decisions are made. Furthermore, I think that the apparent separation between EA and planning seems rather unhelpful, although I have accepted it as a perhaps necessary way into the debate. Are these really parallel worlds that can simply learn from each other, or are they more enmeshed?

2. Planning theory, power, and ethics

No longer does scientific rationality prevail in planning. The idea of 'the rational mastery of the irrational' ([Mannheim, 1940](#)), of the separation of political process from rational policy ([Mannheim, 1940](#), [Davidoff and Reiner, 1962](#), [Faludi, 1973a](#) and [Faludi, 1973b](#)) has increasingly been exposed to critique. The limits it has placed on planning have been described by [Healey \(1997\)](#) as 'a modernist instrumental rationalism' within which 'the planning tradition itself has generally been trapped ... for many years, and is only now beginning to escape'. In response, communicative and deliberative theories of planning (e.g., [Forester, 1989](#), [Innes, 1995](#), [Healey, 1997](#) and [Forester, 2000](#)) have gained in popularity and have been strongly asserted as a reaction against instrumental approaches. At the heart of this communicative turn is an attempt to resolve the long recognised 'problem' of power, by creating planning processes grounded in principles of free speech and rational argument. However, this movement has triggered a critical response: that these are normative approaches that cannot lead to universal solutions: that there is no escape from power, instead power must be embraced. Other theorists prefer to explore how deliberative practices (and planners) can operate within a context of power (e.g., [Forester, 2000](#)), and to explore what has been described as the 'dark side' of planning theory—a body of theoretical and empirical work developed over recent years by, among others, [Yiftachel \(1994\)](#), [Flyvbjerg \(1998\)](#), and [Huxley \(1998\)](#), drawing from a long lineage of political theorists including Thucydides, Machiavelli, Nietzsche, and Foucault.

In parallel with this interest in power, planning theorists are also exploring ethics, seen as inescapable because: "moral judgements and ethical questions pervade the daily practice of planning" ([Campbell and Marshall, 1998](#), p. 117). [Ploger \(2004, p. 49\)](#) puts forward the idea of the 'practical ethicist' in planning, who can identify and engage critically and effectively with a range of ethical value issues related to professional identity, institutional codes of practice, and the societal politicisation of planning through planning legislation, among others.

But Ploger argues that ethics, the foundation of our everyday norms or values ('the way the world ought to be' and 'what we ought to do'), 'is rarely discussed among planners. However, ethics and morality are in fact always part of people's lives and work, and are a part of a working ethos (a foundational way of thinking). He argues that 'planning analysis must try to trace explicit and implicit considerations of ethics in planning' by exploring 'which ethical questions and values, which ethical approaches they work within, approve or withhold' ([Ploger, 2004](#), p. 50).

These recent debates in planning theory which engage variously with power, rationality, value and ethics, create an environment where there are few easy explanations and fewer model solutions. They rarely seek to provide procedural models for practice. Rather, they offer a set of reference points which can be used by planners and others to critically, reflexively, and ethically establish their basis for action.

Hence, I think that, rather than attempt any sort of review or synthesis, it is worth bringing the sorts of approaches being used by planning theorists into contact with environmental assessment debates and practices. This has been taking place recently with a surge of interest in communicative approaches to EA. As a theorist who has been critical of the limits of possibility of the communicative approach, I want to explore how recent work on power, rationality, and value being pursued by some planning theorists has implications for EA which can respond strongly to the current debates around communicative EA.

[Friedmann \(1997\)](#) has argued that theorists' ambivalence about power is one of the biggest outstanding problems in theorising planning. What an increasing number of planning theorists are doing at the moment is placing power at the centre of inquiry, and in different ways exploring how power works, and how planning can be done in an environment shaped by power relations. Of course, planning theorists clearly recognise that it is not enough just to reveal power in an ever-increasing variety of cases. The point is to use the increasingly nuanced analyses of power at work to reflect on how planning can be done better:

We rediscover bureaucracy and politics and racism and selfishness until we are numb, if not cynical; but we need, now more than ever, along with the acknowledgement of political viciousness, corporate greed, systematic impoverishment and institutional racism, to articulate—more and less publically, depending on the setting—the searching analysis of how to do better, pragmatically and critically, really, in a world of power. ([Forester, 1999](#))

Thus, in different ways, a new agenda has been set for planners who need to work effectively in the face of power ([Forester, 1989](#)) towards what John Forester has called the organisation of hope:

Planners, then, must not only listen critically to conflicting and ambiguous claims of value, but they must also shape hope by speaking to real possibilities of public action. They must learn to anticipate and respond in the face of power: they must work sensitively, not hide, in the face of value differences—and students of planning, planning theorists and analysts, must help them, theoretically and practically. ([Forester, 1999](#))

Here, theory is not being used to provide answers to what is right or wrong, or to generate procedural theories about how planning should be done. It is a critical approach which intends to equip the planner to operate more effectively in challenging environments, through reflection. If EA wants to learn from planning theory, it could do worse than to recognise the value of using analyses of practice which really do take on the dimensions of power, and perhaps expecting less from its theoretical debates over procedure:

It is important to ask ... whether expectations of 'theory' are always well placed. As John Forester has observed, 'Theories do not provide answers to problems: people do. But a theory can provide a framework of analysis' ([Forester, 1993](#), 1). Such frameworks, moreover, challenge planners to ask what or whom has been included and excluded from a process or decision, and perhaps even more profoundly to question the very basis on which better or worse courses of action might be judged or revealed. In raising questions as to why things happen as they do and how it might be otherwise the world of planning inevitably becomes more complicated and messy. However, it is in making planning issues messy that something profoundly important can take place. Alternative or new options and possibilities are opened up which previously seemed beyond the scope of discussion. ([Campbell, 2002a](#) and [Campbell, 2002b](#))

To further emphasise the relevance of these debates in planning theory to EA, I will make brief reference to the work of Michel Foucault, which has been influential not just in planning, but across the social sciences. One of Foucault's core concerns was the relationship between knowledge and power: his work reveals how the ways we come to understand the world are shaped by power relations. [Flyvbjerg \(1996\)](#) has referred to Foucault's act of turning Bacon's dictum that knowledge is power on its head, theorising that power creates knowledge, rather than vice versa:

We should abandon a whole tradition that allows us to imagine that knowledge can exist only where the power relations are suspended and that knowledge can develop only outside its injunctions, its demands and its interests ... we should abandon the belief that power makes mad and that, by the same token, the renunciation of power is one of the conditions of knowledge. We should admit rather that power produced knowledge ... that power and knowledge directly imply one another; that there is no power relation without the correlative constitution of a field of knowledge. ([Foucault, 1979](#), p. 27)

Central to Foucault's project was the aim of unsettling the taken for granted, to destabilise hegemonies of thought which protect and reproduce power relations. He particularly singled out for attention the 'apparently humble and mundane mechanisms which appear to make it possible to govern: techniques of notation, computation, and calculation; procedures of examination and assessment; the invention of devices such as surveys and representational forms such as tables; the standardisation of systems for training and the inculcation of habits; the inauguration of professional specialisms and vocabularies' ([Miller and Rose, 1993](#), p. 83). How do these practices reproduce certain modes of thought (e.g., the dominance

of economic interests, and the consequent weakening of environmental protection arguments), and institutionalise the prejudices which are at their heart? This perspective makes it possible to think of how practices of government (and environmental assessment falls squarely into this category) legitimise certain forms of knowledge whilst marginalising or excluding others.

The idea that knowledge is constructed through power relations requires a fundamental rethinking the tools that generate 'knowledge', such as EA. From this perspective, EA is seen as a crucible for the construction of knowledge. The construction of EA methodologies becomes a moment where certain knowledges get framed as being significant, as others are sidelined or ignored (this is the construction of rationality). And if we think of EA as a field of practice, inhabited by EA practitioners among others, then these individuals become (if they choose) powerful players in processes of knowledge formation which require continuous microlevel engagement with differences and conflicts of value. We begin to sense a need for the EA community to engage with questions of value which bear as much on individual action as on the frameworks and procedures which dominate much of EA debate.

3. Flexibility, participation, and a misplaced sense of value

I want to enter the EA debate by engaging with [Fischer's \(2003\)](#) preoccupation with resisting what he sees as the postmodern challenge of flexible SEA. Fischer's argument includes clear indications that public involvement which allows the expression of 'NIMBY' and 'LULU' views should be somehow designed out of SEA, by using more technical methods instead of (it seems) public involvement. The logic here is that, if SEA is to bring about a 'better' environment ([Fischer, 2003](#), p. 162), the process should not allow bottom up expressions of position to interfere with broader, more strategic environmental aims. In this argument, there seems to be a strong but undeclared sense that it is individual or local values which are the main barriers to creating good environments. However, it might also be argued that, often, it is economic interests that prevail in bringing environmental destruction or degradation against the interests of the (local) many. How do we address questions like these in cases like the Three Gorges Dam in China, or the Narmada reservoir project in India, where tens of thousands of people are being displaced by the rising waters of the new dams? Surely in these cases, and in many other cases of proposed development, it is the role of EA in mediating of the clash of interests between development and environmental interests that also needs to be placed under critical scrutiny.

For Fischer, removing 'wrongheaded' public involvement, and placing renewed reliance on technical procedures and expertise to deliver the 'right' top-down environmental outcomes seems to turn away from the current shift towards participative SEA. Stepping away from participation is a dangerous move in today's political and planning climate, which perhaps should only be approached on the basis of a thoroughly worked out position which must surely have something to say about the ethical values that justify exclusion of certain voices from the SEA process.

Seen from a planning perspective, there seems to be a difficulty here: participation is being dealt with as a procedural issue rather than one of *value*. If the difficulty with SEA (or EA for that matter) is seen as being that a turn to flexibility and more participation creates an unwanted risk that 'good' (top-down) outcomes will be overwhelmed by local opposition, it is not possible (or surely not acceptable) to simply design these supposed opposing positions out of the process. One of the issues that the EA community must sort out is how it deals with the presence of multiple and often conflicting values, and ways of valuing. The retrenchment in scientific procedure proposed by Fischer overlooks the fundamental problem that we do not yet have an accepted basis in planning for asserting or deciding that certain environmental objectives should, in certain cases, override locally expressed objectives. 'Sustainable development' does not do this for us, and we have a very poorly developed sense of justice (environmental, social, or spatial) to help us out of this difficulty. If we want to say that global environmental considerations (such as the greenhouse effect) are more important than local environmental considerations (such as landscape conservation) and so we should construct windfarms in sensitive landscape areas, we have made a value-based moral judgement about how things ought to be. It cannot be correct to argue that SEA processes should somehow work in ways which automatically generate outputs that lead to such outcome, *unless* this shift has been the subject of some recognised and legitimate process of decision-making where the ethical values are made explicit and accountable. Otherwise, are we not simply falling into a struggle where SEA is shaped by conflict between different communities of academics, policy analysts, and process designers over what values should preside in society? The point here is to move beyond acceptance of multiple values, to the realisation that value judgements need to be made in the face of multiple and often conflicting ways of valuing.

This short excursion illustrates a difficulty in the EA debate in engaging with theories (like those in planning) which deal with questions of power, rationality, and value. Such talk, however, seems to provoke a reaction which echoes the rationalist response in planning to the communicative debate. It is difficult to perceive the range of motivations for wanting to resist participation in EA, but this type of reaction does bear some of the hallmarks of a resistance to the expression of 'wrong' values, which assumes either a strong sense of 'right' values (e.g., top-down environmental priorities) or a strong belief in scientific and/or professional EA procedures to achieve the 'right' outcome. One explanation suggests a difficulty in accepting

that the values held by theorists may be subjective, the other explanation suggests a faith in value-free science and professional activity that is not borne out by critical studies of EA or by work of the planning theory community.

We have arrived at a problem of values, which is, I think, a critical issue for the EA debate at the moment. Rather than concentrating on procedure, I believe the EA/SEA community should be debating where and how value conflicts and differences are being or could be dealt with. Lawrence has argued cogently for recognition of the significance of values in EA activity:

The role of values and ethics in EIA (more frequently in SIA) is sometimes mentioned ([Mostert, 1996](#), [Firth, 1998](#) and [Satterfield and Gregory, 1998](#)) in EIA literature. It has not been nearly as fully explored, as has been the case in planning theory. ([Lawrence, 2000](#), p. 621)

Hence, I would rather move into the terrain being established by those who are engaging more openly with questions of value.

4. The inevitable mediation between conflicting values in EA

Within the EA literature, there is a growing awareness of the central importance of values in EA. However, there are very different positions emerging over what, precisely, should be done about this. Should EA embrace the presence of values, and attempt to mediate value conflicts through the process (following, e.g., [Daniels and Walker, 1996](#)), or should such decisions over values be completely removed from EA ([Elling, 2004](#))?

There is disagreement within this literature, however, over not just how value differences and conflicts should be mediated within EA, but over whether this is even an appropriate thing to be attempting. On the one hand, a clear position emerges from the literature on mediation and conflict management, advocating that, through public participation, EA should provide a political setting for value differences and conflicts to be mediated to reach decisions. An alternative position, still arguing strongly for increased public participation, argues for EA as an arena of deliberation between different opinions, values, and interests, but where no attempt at mediation or settlement should be made—this is left to the politicians whose deliberations are informed by the outputs of EA.

The mediation approach to managing conflict between stakeholders within participative settings is typically advocated in this way:

Public deliberation should focus attention on a problematic situation, set norms to describe and assess that situation, and generate shared understandings about “the boundaries of the possible in public policy” ([Majone, 1988](#), p. 164, see also [Majone, 1989](#)). ([Daniels and Walker, 1996](#), p. 74)

The emphasis here is on the settlement of conflicts. This approach resonates strongly with theories of policymaking and planning as argumentation among plural interests, and sees mediation as a necessary activity (e.g., [Healey, 1997](#) and [Forester, 2000](#)). This mode of thought has pervaded planning practice so powerfully that in Britain, for example, planning's core business is now being branded as an inclusive endeavour of “mediating space and making place” ([RTPI, 2003](#)). However, it is at precisely this moment of settlement where Elling makes a different case ([Elling, 2004](#)). Grounded in an analysis of Habermas' work, he makes a clear call to separate the political process from the rational deliberation that he views as the proper role of EA. Politicians, who are elected to represent their constituencies, should make difficult judgements about trade-offs between interests, about the best solution to irreconcilable difference. This is not seen by Elling as the appropriate task for EA, which can create a forum for different voices, values, and interests to be brought to light, but which has no legitimate capacity to mediate between them.

But there seems to be an intrinsic problem with this idea that decisions over value differences and conflicts can somehow be taken out of the EIA process by creating new institutions and practices. This difficulty lies in the reality of EA activity, which involves constant microlevel judgements that cannot help but deal with questions of value. Wilkins argues for the inherently value laden nature of EA:

The values of the people engaged in an environmental impact assessment (EIA) play a significant role in its results due to the considerable subjective decision making upon which EIA is based. From screening projects to final decision making, discretion has a prominent role in determining the methodological and practical results of the process. Moreover, the central role of prediction in EIA makes subjectivity unavoidable due to politicized evaluations, narrow boundaries setting, data gaps and simplified assumptions. The attitudes and values of the actors involved in the process are critical to determining the results achieved. ([Wilkins, 2003](#), p. 401)

The point here is that values play a part not just in the final decision-making, once a deliberative EA report is made to a political body. At every stage in the process, values are critical in determining how EA is carried out, from (before) its inception, right through the process at every stage:

as part of a decision-making process. EIAs are political by their very nature ([Bojórquez-Tapia and Garcia, 1998](#), 233–234). Politicized evaluations are fueled by the fact that EIAs are often used to support, oppose or mitigate publicly controversial projects. ([Wilkins, 2003](#), p. 404)

This is as true of designing environmental assessment tools and frameworks as it is of doing environmental assessment. Elsewhere, I have analysed how, in the political struggle to integrate environmental concerns into the policy for the trans-European transport network ([Richardson, 1997](#)), the approach taken on SEA was fundamentally shaped (and weakened) because of overriding economic and political interests and interinstitutional power struggles, none of which were openly addressed in the policy dialogue.

Thus, EA is political to its roots, and the interplay of power and value is inescapable at every step, from the creation of EA frameworks to everyday practice. The implication is that mediation of values is a constant feature of EA work, which leaves the challenging question of whether individual practitioners or the EA community as a whole wish to engage reflexively with this reality, and move from murky practices into a fresh and transparent ethical debate.

5. Value laden EA is a good thing (eventually)

My argument is that we can neither argue for a retreat from subjectivity—a retrenchment into technical procedure and expertise—nor can we leave the values to the politicians. Although the separation proposed by Elling (not between facts and values, but between deliberation and decision-making) can well be argued from a political theory perspective, its application in EA practice would create a cleavage with current approaches in planning, as decisively as would a wholesale rejection of participatory approaches within EA.

Wilkins takes such issues head on and attempts to overturn the critical way in which such concerns are often presented. He argues that this value-aware conceptualisation of EA is in fact essential in achieving broader social and environmental aims:

As a forum for discourse, EIA provides the tools by which changes in social values may evolve. Thus, the value of EIA may not solely lie in its predictive capacities (or lack thereof), but in its role as a mechanism for promoting sustainable development and social learning. ([Wilkins, 2003](#), p. 413)

Setting out these positions in this way makes very clear that EA debates reflect deep divisions within the EA community on questions which are not simply about matters of degree. EA is either value-laden to its roots or it is not. Mediating values either takes place within EA or it does not. Moreover, I do not see easy ways of resolving the differences between the arguments. Questions of value cannot be finessed through earnest discussion about alternative approaches to rationality, which do not resolve the problem of power. Neither communicative theory ([Elling, 2004](#)) nor a retreat into ‘rational’ science ([Fischer, 2003](#)) will help here.

So how could EA's problem with rationality be addressed? The debate between alternative instrumental and communicative rationalities alerts us to the inescapable presence of values in the activity of scoping, filtering, and assessing impacts of development. It does not, however, satisfactorily show us how to deal with them. The argument that we can somehow take the power out of EA by the double step of first recognising value differences and bringing them into the (communicative) EA process, but leaving actual decisions to politicians in the policy process ‘beyond’, depends on a crucial point: that stakeholders can bring different types of knowledge to the EA table, with transparency achieved through open deliberation about the values and beliefs underlying these knowledges. Thus, the EA process becomes acknowledged as a site of knowledge-value gathering, and the link to decision-making is clear. Decisions about value conflicts should be left to politicians. However, there is a problem here. It is not clear how relationships between values, facts, and opinions will be brought into the open in communicative EA, but opening up delicate and complex questions about how ‘true’ certain ‘facts’ are must depend on actors being open and honest in their participation. Personal observation of the micropolitics of consensus building processes suggests that this relies on an untenable leap of faith rather than the introduction of new practices.

6. Turning to practice

The following brief stories present partial accounts of EIA and SEA frameworks being constructed and applied in different contexts. Storytelling is a dangerous activity, because it invites (and creates) reactions. [Eckstein \(2003\)](#) has argued that

storytelling inevitably creates an audience within a community, whilst excluding others (p. 13). However, stories can be helpful in opening up alternative accounts of the things we take for granted, and provide a forum for voices which are not usually heard, even if they do not always make for easy reading.

Here, each story is shaped by the positions of different stakeholders, and different voices are represented, of both insiders and outsiders in the EA process. The first and fourth cases are written from the perspective of environmental organisations and local communities. The second engages with the multiple perspectives of different players within the process, including local authority officers, and the EA practitioner. The third assembles a diverse range of voices including politicians, bureaucrats, lobbyists, and expert advisors. What becomes clear is that, from whichever perspective we build stories of EA practice, we find that power struggles around questions of value are inescapable and require serious attention.

6.1. Case A: power defines facts, judgements, and opinions

Let me try to illustrate the unavoidable presence of values by referring to an (anonymised) case which opens up the question of how central actors deal with problems of power and rationality. One situation in which the information introduced into EA is conditioned by power is the simple case where momentum and political support already exists for a particular project or plan outcome. It would seem likely that the subtle treatment of alternatives in such cases is likely to be heavily conditioned, so that (for example) the treatment of alternatives may be biased or subverted, certain forms of knowledge may become unduly foregrounded, and difficult questions may be pushed to the side or overlooked. These are observations based on participation in a real case, and detailed evidence exists of the events recounted below.

In case A, a group of local authorities had reached political agreement on a particular (road) transport infrastructure project, and had spent a number of years lobbying government and exploring the possibilities for private finance initiative to support the project (the longevity of this campaign was eventually revealed when a confidential memorandum was made public as part of a submission to a public inquiry into the project application, where the Environmental Statement was the key proposal document). The ES dismissed nonroad alternatives, and dismissed alternative locations for the project, based on the logic of previous engineering studies, but without using the test of new, less roads-based national policy. In fact, for 10 years, no alternatives had been considered afresh. Hence, this very expensive and detailed EIA only tested a single 'alternative', and a defensible (and strongly defended) logic was presented: an engineering case, rather than a statement that a political decision had already been made. Here we had a rather unusual case (because of the nature of the specific infrastructure proposal) where the proposal went to a local public inquiry, and the final decision would be made by the Secretary of State. In theory, we had a separation between EA process, its testing in a public hearing, and a final decision in a political domain. To me, the pressures on the local authorities proposing the project created an overwhelming pressure to condition the 'facts' they presented.

This tendency can be further illustrated in this case by the complete omission from the EA of a potentially damaging ecological impact. Contaminated wastes from the construction phase would need to be disposed of away from the locality, but no consideration of this issue appeared in the documentation.

Furthermore, the project was considered to be of great significance to the regeneration of the subregional economy because the existing poor infrastructure was acting as a 'throttle' on development. The possibility of creation of as many as 50,000 jobs was argued to be directly linked to the completion of this single project. Yet, despite significant amounts of information about this in the ES, the argument was rather tenuously based on a number of sites in the area that were either allocated for development, or were listed as possible future employment sites. In 'fact', inspection of the ES revealed the following analysis: 'it is not possible to determine exactly what proportion of this total would be achieved, or how many can be attributed to the [project]'; yet, based on the same analysis, it would be possible for this expert witness to state at the inquiry that: 'My best estimate is that ... lost growth opportunities will be roughly equal to 50,000 jobs.' Again, here, we see the tendency for the distinction between 'facts', 'judgements,' and 'opinions' to become blurred through an apparent political bias running through the case.

I could go further here and discuss how, as an expert witness engaged by the opponents of the scheme, I found the entire process from initial analysis of the ES through to presentation of evidence, and in-depth cross-examination at the inquiry, to be coloured by the vain attempt to separate fact from value. The nature of EA is such that, from an outsider's perspective, it is felt very strongly that engagement in the process must be based on facts. Existing facts can be disputed, and new facts can be offered, but the impression that political bias existed could not be voiced. Here I can see where Elling, calling for recognition of values, is raising a key insight. Nevertheless, given the case I have just set out, I would want to ask whether such new practices as might be invented to identify value relationships would militate against outsiders—opponents, 'NIMBYs', or 'LULUs', rather than proponents. We can see clearly in this case that struggles to define knowledge about a planning proposal are shaped by long established interests, which worked against an honest treatment of local or environmental concerns.

6.2. Case B: SEA creates a process for power brokerage

In this next case, I want to show how, far from removing politics from the process, those commissioning EA can be very interested in using the process for negotiation or mediation among different interests.

In the South Pennines, in England, an SEA was carried out as part of the strategic transport planning process, in an attempt to integrate environmental concerns into a process that had been driven by modelling traffic movements. The 'Strategic Level Environmental Assessment of Selected Strategy Options', carried out by Oscar Faber and RPS Clouston, analysed sustainable multimodal transport options on cross-national park routes. The SEA was commissioned by the Peak Park Transport Forum, a political and technical partnership of local authorities and other agencies which has worked on strategic transport issues since 1994, and whose work is praised in the UK Government's 1998 Integrated Transport White Paper.

The SEA was built on the concern that within a strategic package, certain transport corridors could benefit at the expense of others. Traffic restraint in one corridor, for example, might decant traffic onto other routes. The study therefore aimed to 'identify and compare the strategic environmental impacts of different strategy options' (RPS, 1997). The study, rather than developing a completely new methodology, was, according to the consultant's report, carried out in accordance with national guidelines at the time for project level environmental impact assessment (EIA). In their original brief for the SEA, the Forum had envisaged 'possibly using as a basis the suggestions for SEA outlines in the 1992 SACTRA report... to compare environmental benefits/disbenefits of the various options and to devise an equitable means of comparing landscape/ecological benefits/disbenefits against effects on people'. By the end of the process, they recognised that what they had was not that different to normal EIA, extended to the corridor level, rather than an area-wide SEA.

The narrow range of infrastructure based policy options which have shaped a sequence of studies in the South Pennines appear to have had a constraining effect. The SEA methodology was shaped by its political setting, principally in the adoption of traffic modelling as the foundation of the study. The resulting approach might be described as 'what happens there if we build this here?' rather than 'what can we do to address this problem?'. Despite the lack of resources available to the local authorities in the South Pennines, there has been a continued reliance on complex modelling. However, the lack of substantial resources to invest in the creation of new transport planning frameworks means that existing models and existing technical staff are often being stretched to adapt to different solutions rather than new models or techniques being developed from scratch. In the South Pennines, complex modelling has provided the knowledge base of strategic policy development for nearly a decade, as a series of studies have refined and built on a traffic model which was constructed before the current policy turn.

Several transport planners involved in the process asked why so much effort had been spent on modelling when the emerging strategy was 'obvious'. There was a shared feeling that the strategic options recommended by the studies were not very different from what they saw as a 'common sense' position, that might have been achieved without detailed analysis. It was simply the obvious solution. For them, the studies seemed to provide a useful legitimisation of the strategic planning process, rather than actually guiding it. When pressed about whether the methodology could have been improved, a similar response was obtained: 'Maybe if you started the process again today, you would use different methods, but would you get a different result?' (Anon.). It is striking that these insiders did not reflect on whether the outcomes would be seen as 'common sense' from an outsider's perspective, which might have triggered further questions, not least about the boundaries of deliberation in the process.

These comments notwithstanding, the SEA process generally received a positive reaction from the Forum members. It had served as a useful means of facilitating political debate. Its technical correctness was in many ways less critical. The results, rather than being considered as definitive, should be of the right 'order', and could be used as a 'commentary', or 'steer' to decision-making. In the Peak District, the strategic studies focused the attention of professionals and politicians on the heated issue of cross-park traffic congestion, and the case for infrastructure investment. However, the framing of the debate excluded any detailed focus on community transport needs, or on visitor traffic management.

The South Pennines SEA is a good example of a study process being used to facilitate, rather than simply inform, the strategic consensus building process. It is noteworthy that several Forum members were less interested in the outcome than in its political usefulness in maintaining the partnership: 'We had information there that probably confirmed what we thought, but it's useful for that anyway' (Forum Member). 'The strategy is not earth shattering' (Forum Member).

A major issue which arose was the role of the study processes in shaping the emerging strategy. The consultants adopted a straightforward view of the SEA process: they had a technical job to do. Some representatives of the local authorities, however, saw things differently. As the study progressed, it became a vehicle for the debates over strategic options between

Forum Members, as the impacts of different options on different corridors crystallised. The SEA was described as a medium for 'pushing and shoving' by one Forum Member. Others were more explicit:

I was interested in the outcome of the more focused study in providing us with leverage... to argue with the National Park Authority if what they proposed was going to be damaging to our interests, but also as a lever either with the County Council or DETR¹ to get something done about our roads (Forum Member).

It allowed us to go forward and support the NPA strategy, but with a lot of if's, but's and maybe's (Forum Member).

It is interesting to see how an environmental assessment process can become an arena for mediation between strategic partners, where knowledge is shaped by negotiations and tensions between positions, and by the need to secure a working consensus.

Here we see how the process of knowledge making becomes an arena for achieving a political settlement, and how the political settlement in turn shapes the assessment output.

6.3. Case C: power defines rationality

The next case study considers the integration of environmental policy at the EU level, focusing on the development of Policy Guidelines for the trans-European transport network (TEN-T: [CEC, 1996](#)). In this case, the construction of SEA methodology was the vexed issue which became a site of conflict between economic and environmental interests, played out in the Parliamentary Committees and Council Chambers of the EU institutions ([Richardson, 2000](#)). In the early 1990s, a key question was how environmental concerns might be integrated into major strategic policy initiatives, where the critical barrier to political agreement was seen as methodological:

The problem is that nobody has done [SEA] before, so a methodology has had to be developed. Unless there is a degree of consensus about the adequacy of the means of assessment the value of the whole thing will be reduced, and it won't stick. (Anon.)

However, the introduction of SEA was a highly contested issue, and an alternative view suggested that the positions around SEA reflected the playing out of interests, rather than a more reasoned evaluation of the procedure itself: 'So this [was] a realpolitik as opposed to reasonable scientific approach' (Anon.). As a result, proponents of TEN-T argued that SEA simply created a procedural bind, obstructing and delaying infrastructure projects, rather than providing any meaningful environmental input into decision-making:

SEA is a procedural thing. It offers endless scope to those who wish to object to things on procedural grounds. ... the concern is that it will just give more chance to those who want to make mischief, rather than to those who have genuine complaints ... It basically just makes the project more difficult to build, and it just struck us as being completely counter to the idea of TEN-T. The idea of TEN-T was to get these things going. I mean Kinnoek keeps saying the aim is to get these things built, and we're putting up hurdles. (Anon.)

As the debate became polarised between the European Council (driven by the interests of member states in securing more EU support for infrastructure investment) and the Parliament (concerned with the environmental impact of the proposals, and looking for opportunities to flex its muscles as an increasingly powerful political player, but also driven by concerns about job creation), the principle of SEA was subject to aggressive challenge, and a storyline emerged that the call for SEA was simply a desperate manoeuvre to introduce some measure of environmental protection. The tool itself was not really the issue; it had become a political football:

They wanted an assessment of the whole of the TEN-T as a precondition for building. But too late folks, most of it is there already. And this was the thing that was most annoying to the Council. You had the Parliament saying "right, stop everything, we're going to do SEA on the whole of the TEN-T". There is no consensus on how to do this, in fact some of the methodology doesn't exist. So we're going to wait five years to do the methodology, we're then going to stop the planning process and put all this into practice, then we're going to carry out corridor studies for individual corridors and decide what is the best modal solution for each individual corridor. So maybe we don't want a motorway here, we want a railway, a waterway or something like this. So you do all this, which is going to take 20 years, and yet they want the TEN-T delivered next year. Frankly this was just incoherent. Stupid. The kinder way of describing it was that they just thought they were going to push for some environmental protection all round, and they weren't too worried about the internal coherence of the actual measure, but they thought let's go for it. They realised that they weren't going to get a lot, but they were keen to raise the stakes and raise a flag for this thing. And they certainly did raise the profile of it in the Council. (Anon.)

In the debate, there was very little specific attention to what SEA could actually achieve in decision-making. A common view was of SEA as a device for creating an impression of meaningful progress on the environment, although its exact nature seemed to be very unclear:

But I can tell you that it is pure philosophy. Nobody that I know in the Commission or elsewhere knows exactly what is meant by [SEA]. It is another nice word to keep politicians at bay. (Anon.)

SEA in this case can be interpreted as a procedural device which satisfied many interests by having something tangible to point at, beyond bland policy statements about conforming to environmental objectives. The vagueness of the concept, and its slow deployment, served to further the interests of expediting the TEN-T programme.

For those who were interested in SEA as an environmental tool, this power dimension, as SEA became a political football almost without concern for the final outcome, was frustrating: 'SEA in itself is a very, very simple tool for helping decision-making. So neither party should have been really so violent about it' (Anon.). However, given that SEA was at the crux of the strategy to green TEN-T, it is not surprising that positions for and against it were strongly expressed. For the environmental activists as well as policy insiders, there was a need to create a political, rather than technical, case for the adoption of SEA: 'The problem was, it was so late in the day, it was so pathetic the ways the Guidelines had been proposed in the first place that you had to find something rather dramatic to get the whole thing into the picture' (Anon.).

Those closer to the methodological debate were divided between advocates of early application and hands-on development of SEA, using best available methods, and advocates of a more cautious approach based on researching and improving methodology before application. Within the Commission, the (more powerful) Directorate responsible for transport infrastructure was keen to progress policy without delay, while the Directorate responsible for environmental protection keen to secure some useful outcome on the environment. Further methodological work would ensure that emerging policies and network plans would not be adversely affected by environmental concerns. Unsurprisingly, there was a clear feeling among environmental NGOs as well as policy insiders that further studies on methodology were part of a strategy of delaying the application of SEA, particularly given the piloting work already carried out on the High Speed Rail Network.

The final formulation of SEA in the TEN-T Policy Guidelines failed to establish SEA as either participative planning process, or useful analytical tool in strategic decision-making, with weaknesses in procedure, methodology, and implementation. It called for further work to be done on methodology, and did not actually require SEA to be applied to the infrastructure networks that were defined at the time. The gulf between policy rhetoric and practical measure reveals the weakness of this construction of SEA. Its eventual implementation (still anticipated) is unlikely to ask basic policy questions, to veto any particularly harmful project, or to move transport in Europe towards sustainability. Furthermore, by failing to enable EU environmental intervention, SEA leaves the powers of environmental jurisdiction and competence largely at the member state level. Quite apart from the problems this raises in achieving EU environmental objectives, the opportunity to use SEA as a tool to achieve broader objectives of sustainable development by creating a more transparent, accountable, and participative approach to infrastructure planning was missed.

The political and institutional setting of SEA development shaped its scope, timing, methodology, and ultimately its impact. In this case, SEA was shaped by the hegemonic interests of the single market and political integration, by interinstitutional politics and by the actions of interest groups. Appreciating the constructed nature of techniques of environmental integration, like SEA, helps us to understand the dangers in regarding them simply as rational scientific tools. In the EU, the powerful discourses of the single market and political integration are deeply ingrained in the culture of the key EU institutions, conditioning the possibilities of the policy process, shaping the problems that need to be solved, the methods to be used in their analysis, and the solutions that can be considered. This powerful conditioning resulted in a TEN-T policy process which has successfully assimilated environmental concerns by not only creating a suitable policy rhetoric, but constructing a process which, at first sight, appears to allow positive environmental integration.

6.4. Case D: EIA as a means of democratising decision-making

The final case shows how environmental assessment can be used as a site of conflict over core values by civil society, regardless of the intentions of bureaucrats, practitioners and politicians. In the countries of Central and Eastern Europe (CEE), public participation is a relatively new phenomenon which is being introduced to traditionally closed planning processes. In the face of inertia against the democratisation of decision-making, environmental nongovernmental organisations (NGOs) are beginning to play a critical double role in both advocating the need for reform and in proactively establishing new practices in public participation. However, in the Czech Republic, the development of public participation programmes has been regarded

by public authorities and developers as creating new difficulties for decision-making, exposing projects to additional risk, and generally upsetting the efficiency of decision-making, costing time, and money (PEAC, 1995).

Here, then, the application of EA becomes a moment to challenge the emerging democratic polity, as activists act reflexively on the question of whether to directly oppose development from their strong environmental perspective, or instead to put their energies into democratising the decision-making process, thereby encouraging and facilitating wider participation. Rather than using strategies of persuasion pointing out the bad impacts of development proposals, the NGOs opted to press for a communicative environment, creating opportunities for wider participation than allowed by the formal process.

The action taken by NGOs was to organise *parallel public participation* (PPP) programmes alongside the formal EIA of proposals (Richardson et al., 1998). This involved organising public meetings and other events designed to raise awareness, gauge attitudes, and generate debate. In this way, members of the public were supported in recording their responses within the formal EA process. In each case, as well as being resistant to public involvement, local authorities were resistant to identifying or examining development alternatives because of strong commitments to a particular proposal. Parallel public participation was used to introduce public involvement as early as possible in the process, critically at the scoping stage when alternatives could be identified (and earlier than Czech law requires). The direct results were that the deficiencies of EIA were exposed, and, in some cases, they had to be revised, and that alternatives were given due consideration. This practice is interesting because the environmental NGOs cannot know that the increased participation resulting from their work will lead to more support for their positions. Therefore, while their fundamental aim was to stop what they saw as bad projects, they placed faith in the expression of the values held by local residents and other nonenvironmental NGOs.

Thus, here, we see a case of EA being used as an opportunity to democratise decision-making, against the wishes of developers and local authorities. Power, here, gives shape to the introduction of value-driven knowledge into the arena. The question of whether formal decision-making, or adjudication over value differences, takes place elsewhere, becomes redundant here, as the injection of values disrupts the formal process and preempts the anticipated decision. Thus, EA, because it takes place in the real world, can be subject to deliberate strategies which do not correspond with theories, or carefully designed processes which seek to separate values from process, or which seek to create hermetically sealed containers for making judgements over value conflicts. EA can, then, become an opportunity for those outside the EA process to visibly disagree with the decision-making process, and therefore to act to change it. The idea of separation of value politics from EA completely dissolves when we consider that such actions may take place for different reasons, which may well be poorly understood by those charged with carrying out EA. Defenders of non-value-political SEA would therefore need to resist and oppose such insurgent practices.

7. Towards ethics

In the cases of EA practice discussed above, it should be abundantly clear that value conflicts are present at every stage: in the construction of EA tools and frameworks and throughout the practice of environmental assessment. The value conflicts can be seen to be played out in struggles to shape the form and content of EIA and SEA. In every case, rationality is at stake, as ground rules of the process are defined, as certain claims knowledge are made, as interests are mediated. There are recurrent frustrations with these power struggles. Consultants see their work as analytical rather than brokering political deals. Expert advisors see their tools distorted by politicians and pressure groups. However, most actors—planners, politicians, and stakeholders—see EA as an opportunity to persuade, to mediate, and to contest. This is necessary because that is how planning is. EA is being used by actors in the real world to mediate and contest value differences and conflicts, and EA practitioners are engaged in the daily business of mediating values, consciously and ethically or not, yet the EA community seems divided on whether this is happening, appropriate, or desirable.

In the cases above, there is a tendency for EA to concentrate on the provision of public participation as the key to working with difference and conflict. However, the extracts show clearly that in the fine grain of EA work, value conflicts are present throughout EA: they are played out in the making of professional judgements, in the taken for granted ways of doing things, and in the political considerations that limit and condition the possibilities for action. Hence, alongside considerations of participation in EA, there remains a need to address how values are put at stake in the everyday actions and practices of EA practitioners and planners. This requires a different focus, on the *ethics of practice*.

As much as procedural approaches along the lines discussed above contest the locus of value in EA processes and institutional forms, there is a parallel debate to be had about how EA professionals deal with issues of value within their daily practice.

As an illustration of these challenges, the International Association for Impact Assessment's statement of 'our vision, our mission, our values' sets out the core principles of equity and sustainability ([IAIA, 2004](#)). In its good practice guidance, for both EIA and SEA, the principles of professionalism, rigor, fairness, objectivity, impartiality, and balance are clearly identified ([IAIA, 1999](#) and [IAIA, 2002](#)). More locally, work is being done in South Africa by the Certification Board for Environmental Assessment Practitioners of South Africa ([CBEAPSA, 2003](#)) to create a Code of Ethics for EA practitioners. Within this document, under the heading 'bias, facts, and opinion', practitioners are instructed to avoid bias:

6.2.4 Environmental assessment practitioners shall not conduct professional activities in a manner involving dishonesty, fraud, deceit, misrepresentation, or bias.

6.2.5 Environmental assessment practitioners will clearly differentiate between facts and opinions in their work ([CBEAPSA, 2003](#)).

The stories above should adequately show, in different ways, that, however well meaning a practitioner may be, the ideas that facts are easily distinguishable from opinions, or that fairness, objectivity, impartiality, and balance are the natural products of professionalism, are wishful thinking. Such statements do not flow from an acceptance that values, and conflicts over value, are ingrained in planning practice, where guidance on ethical practice would be expected. Instead, they are based on a rational, expert-driven framing of EA, which does not relate well to EA in its real world context. Mention of bias, partiality, and misrepresentation creates an unenviable ethical dilemma for those practitioners who find themselves in the sorts of situations outlined in the cases above. Where is the line between fact and bias when you work for an authority that has built-up political momentum behind a particular project? EA is a more messy world than these black and white ethical guidelines would suppose. They rely on a view of EA which cannot or does not want to see the value-laden nature of practice, and they give no practical support to practitioners faced with the more grey reality of everyday work in a highly charged setting.

8. Conclusions—reflexivity and ethics in a world of contested rationality

The field of environmental assessment is in a dance with rationality that mirrors planning debates. The weaknesses in EA that result from a form of rationality which is 'often autocratic and technically biased, poorly designed to match contextual characteristics, and weak in fostering creativity, in facilitating dialogue, and in appreciating the political nature of planning. It, too, can be prone to artificial assumptions regarding comprehensiveness, a unitary public interest, objectivity, predictability, and control' ([Lawrence, 2000](#), p. 611), have led to an upsurge of collaborative theory and practice in EA, to the extent that 'fair dialogue and effective communications is a recurrent theme in EIA literature' ([Lawrence, 2000](#), p. 617).

The first difficulty is that these two expressions of alternative rationality do not easily coexist. One is the product of a critique of the other. We have seen the weakness of instrumental, technical approaches through the eyes of the communicative theorists, but now, from the perspective of debates in planning, which have critiqued, in turn, the communicative movement, we see that we do not have an easy replacement. EA literature is becoming a field of engagement between two forms of procedural rationality, neither of which can decisively resolve the most fundamental questions which have been explored in this paper. Rationality is contested, and EA theorists and practitioners will not be able to rest in the knowledge that a single procedural rationality can delineate facts from opinions, provide comprehensive knowledge, and remove the possibility of bias or the distortions of politics.

Not being able to create ideal rational scientific or communicative processes means that we need to work with an understanding of power and contested rationality. However, it has generally been argued that power has a negative effect on environmental assessment. For example, 'when high political and economic stakes are at hand, planning and EIA processes seem to become 'distorted': thus, in some instances, creating [below] average EIA processes and documents' (e.g., [Sager, 2001](#), p. 236).

Thus, what should we do then, if EA is immersed in power relations, where:

There is no escape from manipulating fronts, seeking membership of communities, protecting fragile egos, manoeuvring for advantage and power, seeking to assert one's ethic over others, deploying discourse and establishing spiked rules to dominate others, disputing methodology and therefore professional or disciplinary competence. This is all normal behaviour. (Wood, 1998, cited in [Hilding-Ryevik, 2001](#))

Within EA, competing, poorly understood rationalities cut across each other. Practitioners are working with different rationalities, and have little reflexive capacity to deal with this because the literature does not help them. In the South Pennines case above, the use of a technical study for normative purposes quite neatly shows the extent of misunderstanding over

procedural rationalities. In other cases, we see rationality being shaped by powerful interests. Not surprisingly, individuals in different positions are angry or disappointed that EA in practice fails to achieve their expectations. In particular, the major tension between alternative rationalities of EA frequently finds expression as dissatisfaction with process or outcome.

We need to see these alternative approaches to rationality as movements—they were not inevitable, and, in fact, the communicative turn is in itself a reaction to the perceived weaknesses of instrumental (or procedural rationality). Hence, once we see rationalities as social constructs, why do we restrict ourselves to a duality between two forms of rationality? Surely, as analysts, we should be open to noticing different forms of rationality, and, as a community conceptualising practice, we should be open to a dialogue about what form(s) of rationality are appropriate in underpinning and shaping our practices. In thinking about how practitioners can respond to these challenges, perhaps we need to return to the idea of real life rationality, which moves away from the normative approach to rationality, and instead asks 'how knowledge, rationality, and power work in real life' (Flyvbjerg, 1996, p. 384, 1998). Furthermore, it 'becomes meaningless, or misleading—for politicians, administrators and researchers alike—to operate with a concept of rationality in which power is absent' (Flyvbjerg, 1998, p. 164–65). This critical approach to rationality, which does not follow a single normative approach, seems more likely to equip practitioners to work in the face of power (Forester, 1989). In a similar vein, Watson has argued that

planners and other agents of intervention continue to make assumptions about the values, beliefs, or rationalities of those for (or with) whom they plan, which frequently do not hold. The only way to counter this is to explore, in context, examples of planning intervention which illustrate the various rationalities at play and how they interact with each other in a planning or development process. (Watson, 2003, p. 404)

This turn to rationality and power suggests a need to take a fresh critical look at practice, and at the ideas shaping practice. Embracing power, and accepting that rationality is no longer singular, maybe liberating. How, then, can EA practitioners work reflexively and ethically in a world of contested rationality? How can they operate within an environment of contested knowledge? How can EA practitioners act?

The first response, as implied above, is that practitioners should build critique into their work. Critical understanding, supported by academic work, can maintain a perspective which is more aware of the clash (or subtle shaping) of ideas and practices than an approach which expects procedural models and norms to absolve the individual practitioner from responsibility:

If we can understand more clearly the forms of discursive interplay in the everyday activity of planning, we can become more proactive and more strategically effective in the process of discursive construction that we are all-planners, policy makers, lobbyists, politicians, academics-engaged in. We are all in the business of constructing and reproducing policy and planning discourses. It would be a shame to be passively or naively complicit in reproducing the wrong ones! (Richardson, 2002)

Finally, it is worth introducing two areas of inquiry in planning theory which, in different ways, are moving these debates forwards: storytelling and ethical judgement. The first is the idea of planning as persuasive storytelling (Throgmorton, 1992), strongly connected with the recognition that, in a world of deliberative and discursive democracy, the possibility of creating better futures through planning relies heavily on the stories which are created in public arenas and processes of decision-making and plan-writing. In addition, stories can be more or less persuasive, depending on whether we are able to understand who their authors are. Do they stand the test of legitimacy?

As a citizen reader I am confused about my own identity when the account of the authorial process doesn't tell me who took initiative, how conflicts were articulated and then resolved, and who if anyone held a veto. At the simplest level, not understanding the author, I can't tell whether the *Plan* is a binding legal prescription or a statement of aspirations. (Throgmorton 1990, cited in Eckstein, 2003, p. 17)

Eckstein comments: 'as a citizen-reader I, too want to be able to identify the authors of the stories planners use and tell so I can assess the bases of their claims to—or, in some cases, presumptions of—authority' (Eckstein and Throgmorton, 2003, p. 17). These comments resonate strongly with environmental assessment as an expert process which generates faceless documents—concealing such issues as whether there were disputes over scoping, or over how significance should be attributed to certain impacts—yet which plays a persuasive role within planning debates, legitimising certain stories at the expense of others. Throgmorton's (1992) challenge to planning, which applies equally to environmental assessment, is that we need to 'learn how our technical skills (forecasting, surveying, modelling) act as persuasive imagery within our texts, and to learn why those tropes help to persuade some audiences but not others' (p. 29). In this paper, I have presented fragments of stories about EA, which would not correspond with the stories reported in the formal documentation about rigorous objective analysis. The fragments explain attempts to use EA persuasively, in very different ways. Without doubt, more and more detailed stories need

to be written about EA. Perhaps the critical challenge, however, is whether the EA community can become a willing audience for such stories about its practices.

The second area of current inquiry in planning which bears directly on questions of 'what to do' concerns how we deal with questions of value. Heather Campbell is exploring how planners can make situated ethical judgements, based on a critical understanding that decisions have high stakes, and that some outcomes are better than others (e.g., [Campbell, 2002a](#) and [Campbell, 2002b](#)):

in a world where we understand that knowledge can only ever be partial and transitory we must rely on judgement, and that fundamental to the process of judging between better and worse, is the question of value. Actions cannot be value-free, so rather than hiding, implying or side stepping such concerns, explicit consideration needs to be given to the nature of the ethical values our processes and outcomes are seeking to promote.

Through such explorations, environmental assessment may be better understood as a field of practice within which hard choices are made about questions of value. However, where these choices are not made through scientific analysis alone, or through open public deliberation. The knowledge that is bound up with these choices gets shaped and contested in the fine grain of EA work, in the town halls where certain projects and plans are moulded according to preestablished agendas, and in civil society. This reality cannot be avoided by a retreat into one form of rationality or another. It requires facing up to power, using EA to articulate legitimate and honest stories about development and sustainability, and making explicit the ethical nature of the judgements made along the way.

References

- [Allmendinger, 2001](#) P. Allmendinger. Planning theory. Palgrave Macmillan, Basingstoke (2001).
- [Bojórquez-Tapia and García, 1998](#) L.A. Bojórquez-Tapia and O. García. An approach for evaluating EIAs: deficiencies of EIA in Mexico. *EIA Rev.* **18** (1998) (3), pp. 217–240.
- [Campbell, 2002a](#) H. Campbell. Interface: Thinking about discourses: theory is practical?. *Plan. Theory Pract.* **3** (2002) (3), pp. 351–352. [Full Text via CrossRef](#)
- [Campbell, 2002b](#) H. Campbell. Planning: an idea of value. *Town Plan. Rev.* **73** (2002) (3), pp. 271–288. [View Record in Scopus](#) | [Cited By in Scopus \(13\)](#)
- [Campbell and Marshall, 1998](#) H. Campbell and R. Marshall. Acting on principle: dilemmas in planning practice. *Plan. Pract. Res.* **13** (1998), pp. 117–128. [View Record in Scopus](#) | [Cited By in Scopus \(10\)](#)
- [CBEAPSA, 2003](#) CBEAPSA (Certification Board for Environmental Assessment Practitioners of South Africa). Draft Constitution of the Interim Certification Board. <http://www.eapsa.co.za/downloads.html#info>. Accessed 18 8 2003, 2003.
- [CEC, 1996](#) CEC. Decision No. 1692 96 EC of the European Parliament and of the Council of 23 July 1996 on Community guidelines for the development of the trans-European transport network. OJ L228, vol. 39. Brussels, CEC, 1996.
- [Daniels and Walker, 1996](#) SE. Daniels and GB. Walker. Collaborative learning: improving public deliberation in ecosystem-based management. *Environ. Impact. Assess. Rev.* **16** (1996), pp. 71–102. [SummaryPlus](#) | [Full Text + Links](#) | [PDF \(1811 K\)](#) | [View Record in Scopus](#) | [Cited By in Scopus \(90\)](#)
- [Davidoff and Reiner, 1962](#) P. Davidoff and T. Reiner. A choice theory of planning. *J. Am. Inst. Plan.* **28** (1962), pp. 331–338.
- [Eckstein, 2003](#) B. Eckstein. Making space: stories in the practice of planning. In: B. Eckstein and J. Throgmorton. Editors. *Story and sustainability: planning, practice and possibility for American cities*. MIT, Cambridge (MA) (2003), pp. 13–36.
- [Eckstein and Throgmorton, 2003](#) In: B. Eckstein and J. Throgmorton. Editors. *Story and sustainability: planning, practice and possibility for American cities*. MIT Press, Cambridge (MA) (2003).
- [Elling, 2004](#) B. Elling. Modernity and communicative reflection in environmental assessment. In: T. Hilding-Rydevik and Á. Hlökk Theodórsdóttir, Editors. *Planning for sustainable development—the practice and potential of environmental assessment* Proceedings from the 5th Nordic Environmental Assessment Conference, Reykjavik, Iceland, 25–26 August 2003. Stockholm: Nordregio (2004).
- [Faludi, 1973a](#) A. Faludi. Planning theory. Pergamon, Oxford (1973).
- [Faludi, 1973b](#) A. Faludi. A reader in planning theory. Pergamon (1973).
- [Firth, 1998](#) L.J. Firth. Role of values in public decision-making: where is the fit?. *J. Impact Assess. Proj. Apprais.* **16** (1998), pp. 325–329. [View Record in Scopus](#) | [Cited By in Scopus \(5\)](#)
- [Fischer, 2003](#) T.B. Fischer. Strategic environmental assessment in post-modern times. *Environ. Impact. Assess. Rev.* **23** (2003), pp. 155–170. [SummaryPlus](#) | [Full Text + Links](#) | [PDF \(232 K\)](#) | [View Record in Scopus](#) | [Cited By in Scopus \(34\)](#)
- [Flyvbjerg, 1996](#) Flyvbjerg B. The dark side of planning: rationality and "realrationalitat". Explorations in planning theory. Mandelbaum, S., Mazza, L. and Burchell, R. Rutgers: Centre for Urban Policy Research, 1996.
- [Flyvbjerg, 1998](#) B. Flyvbjerg. Rationality and power: democracy in practice. University of Chicago Press, Chicago (1998).
- [Forester, 1989](#) J. Forester. Planning in the face of power. University of California Press, Berkeley (1989).
- [Forester, 1993](#) J. Forester. Critical theory, public policy and planning practice: toward a critical pragmatism. SUNY Press, Albany (1993).
- [Forester, 1999](#) J. Forester. Reflections on the future understanding of planning practice. *Int. Plan. Stud.* **4** (1999) (2), pp. 175–194.
- [Forester, 2000](#) J. Forester. The deliberative practitioner: encouraging participatory planning processes. M.I.T. Press, Cambridge (2000).
- [Foucault, 1979](#) M. Foucault. Discipline and punish: the birth of the prison. Vintage, New York (1979).
- [Friedmann, 1997](#) J. Friedmann. Planning theory revisited. AESOP Congress, University of Nijmegen (1997).
- [Healey, 1997](#) P. Healey. Collaborative planning: shaping places in fragmented societies. Macmillan, Basingstoke (1997).
- [Hilding-Rydevik, 2001](#) In: T. Hilding-Rydevik, Editor. *EIA, large development projects and decision-making in the Nordic countries, R2001:6*. Nordregio, Stockholm (2001).
- [Huxley, 1998](#) M. Huxley. Planning as discursive democracy or land use regulation as social control. Oxford Planning Theory Conference, Oxford Brookes University, 2–4 April (1998).
- [IAIA, 1999](#) IAIA. 1999. Principles of Environmental Impact Assessment Best Practice. Accessed at www.iaia.org/Members/Publications/Guidelines_Principles/Principles%20of%20IA.PDF. International Association for Impact Assessment. 2004.
- [IAIA, 2002](#) IAIA. 2002. Strategic Environmental Assessment Performance Criteria. Accessed at www.iaia.org/Members/Publications/Special_Pubs/sp1.pdf. International Association for Impact Assessment. 2004.

IAIA. 2004 IAIA. 2004. Welcome to IAIA. Accessed at http://www.iaia.org/Non_Members/About%20IAIA/about_iaia.htm. International Association for Impact Assessment. 2004.

Innes, 1995 J. Innes. Planning theory's emerging paradigm: communicative action and interactive practice. *J. Plann. Educ. Res.* 14 (1995) (3), pp. 183–190.

Jensen and Richardson, 2004 O.B. Jensen and T. Richardson. Making European space: mobility, power and territorial identity. Routledge, London (2004).

Lawrence, 2000 D.P. Lawrence. Planning theories and environmental impact assessment. *Environ. Impact. Asses. Rev.* 20 (2000), pp. 607–625. [SummaryPlus](#) | [Full Text + Links](#) | [PDF \(151 K\)](#) | [View Record in Scopus](#) | [Cited By in Scopus \(19\)](#)

Majone, 1988 G. Majone. Policy analysis and public deliberation. In: R.B. Reich, Editor. *The power of public ideas*. Harvard Univ. Press, Cambridge (MA) (1988), pp. 75–105.

Majone, 1989 G. Majone. Evidence, argument and persuasion in the policy process. Yale Univ. Press, New Haven (1989).

Mannheim, 1940 K. Mannheim. Man and society in an age of reason: studies in modern social structure. Paul, Trench, Trusner and Co., London (1940).

Miller and Rose, 1993 P. Miller and N. Rose. Governing economic life. In: M. Gane and T. Johnson, Editors. *Foucault's new domains*. Routledge, London (1993), pp. 75–105.

Mostert, 1996 E. Mostert. Subjective environmental impact assessment: causes, problems and solutions. *Impact Assessment* 14 (1996), pp. 191–214.

PEAC, 1995 PEAC. 1995. Zpráva pro N-ROS. Report for the Foundation for the Development of Civil Society, by J. Dusik and Z. Kouba. Prague.

Ploger, 2004 J. Ploger. Ethics in Norwegian planning: legitimacy, ambivalence, rhetoric. *Plan. Pract. Res.* 19 (2004) (1), pp. 49–66.

Richardson, 1996 T. Richardson. Foucauldian discourse: power and truth in the policy process. *Eur. Plan. Stud.* 4 (1996) (2), pp. 279–292. [View Record in Scopus](#) | [Cited By in Scopus \(28\)](#)

Richardson, 1997 T. Richardson. The trans-European transport network: environmental policy integration in the European Union. *J. Eur. Urban Reg. Stud.* 4 (1997) (4), pp. 333–346. [Full Text via CrossRef](#) | [View Record in Scopus](#) | [Cited By in Scopus \(17\)](#)

Richardson, 2000 T. Richardson. Environmental integration in infrastructure planning: a Foucauldian discourse analysis of the trans-European transport network. *Urban and Regional Studies*, Sheffield Hallam University, Sheffield (2000).

Richardson, 2002 T. Richardson. Freedom and control in planning: using discourse in the pursuit of reflexive practice. *Plan. Theory Pract.* 3 (2002) (3), pp. 353–361. [Full Text via CrossRef](#)

Richardson et al., 1998 T. Richardson, J. Dusik and P. Jindrova. Parallel public participation: an answer to inertia in decision making. *Environ. Impact. Asses. Rev.* 18 (1998), pp. 201–216. [SummaryPlus](#) | [Full Text + Links](#) | [PDF \(88 K\)](#) | [View Record in Scopus](#) | [Cited By in Scopus \(9\)](#)

RPS, 1997 RPS Consultants Ltd and Oscar Faber. South Pennines Transport needs study: strategic level environmental assessment of selected strategy options (1997).

RTPI, 2003 RTPI. A new vision for planning: delivering sustainable communities settlements and places. *Mediating space-creating place: the need for action*. Royal Town Planning Institute (2003).

Sager, 2001 T. Sager. A planning theory perspective on the EIA. In: T. Hilding-Rydevik, Editor. *EIA, Large development projects and decision-making in the Nordic countries* vol. R2001:6. Nordregio, Stockholm (2001), pp. 197–222.

Satterfield and Gregory, 1998 T. Satterfield and R. Gregory. Reconciling environmental values and pragmatic choices. *Soc. Nat. Res.* 11 (1998), pp. 629–648.

Throgmorton, 1992 J. Throgmorton. Planning as persuasive story telling about the future: negotiating an electric power rate settlement in Illinois. *J. Plann. Educ. Res.* (1992) (12), pp. 17–31. [Full Text via CrossRef](#)

Watson, 2003 V. Watson. Conflicting rationalities: implications for planning theory and ethics. *Plan. Theory Pract.* 4 (2003) (4), pp. 395–407. [Full Text via CrossRef](#) | [View Record in Scopus](#) | [Cited By in Scopus \(16\)](#)

Wilkins, 2003 H. Wilkins. The need for subjectivity in EIA: discourse as a tool for sustainable development. *Environ. Impact. Asses. Rev.* 23 (2003), pp. 401–414. [SummaryPlus](#) | [Full Text + Links](#) | [PDF \(155 K\)](#) | [View Record in Scopus](#) | [Cited By in Scopus \(18\)](#)

Yiftachel, 1994 O. Yiftachel. The dark side of modernism: planning as control of an ethnic minority. In: S. Watson and K. Gibson, Editors. *Postmodern cities and spaces*. Blackwell, Oxford (1994).