3. Objectives for, of and in Strategic Environmental Assessment

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Abstract

This chapter explores the use of objectives as part of Strategic Environmental Assessment (SEA). As suggested by the title, it does this by considering objectives in several ways. To illustrate the points made in our discussion we draw on UK practice examples, own research and also from international SEA literature. Looking at how objectives are set *for* SEA, how objectives *of* SEA are drawn up and how SEA scrutinises objectives *in* policies, plans and programmes shows how, far from being a simple procedural technique, the use of objectives is embedded in the politics of the environment, sustainable development and decision-making.

Introduction

'Objectives-led' is a particular approach of conducting impact assessment and the authors wrote on this in relation to Sustainable Appraisal earlier (Hayes and Fischer, 2015). This chapter seeks to expand on the discussion of objectives-led impact assessment to consider three ways in which objectives can relate to SEA. We begin by exploring the objectives *for* SEA, making connections to work on the purposes of SEA and what we seek to achieve by completing it. We then consider perhaps the most classic objectives-SEA relationship – the objectives *of* SEA. These are the specific objectives set to drive an SEA process itself. We then move on to examine objectives *in* SEA. In this section we consider the objectives of policies, plans or programmes which SEA does, and does not, manage to scrutinise.

First, though, we set out what we mean by SEA, its development in the UK, and also what we mean by 'objectives-led' SEA. The general development of SEA is covered in much greater detail than we can afford here in previous texts (see for example Fischer, 2007; Jones et al., 2005; Therivel, 2010; see also Chapter 1 of this book by Fischer and González, 2020). However, we will outline some basic information on the form of SEA on which we base our discussion. Our understanding of SEA includes assessments that are conducted at a strategic level (usually referred to as policies, plans and programmes, and sometimes also include mega-projects) and/or are strategic in nature. We draw primarily on UK experiences and so derive our understanding of SEA from the various sectors and nations of the UK (England, Scotland, Wales and Northern Ireland) within which SEA is practiced.

The developmental story of SEA typically frames it as having its roots in Environmental Impact Assessment (EIA) which had been established by the National Environmental Policy Act (NEPA) in the United States in 1969 and EU Directive 85/337/EEC (the EIA Directive) in 1985. In this context, of

particular importance is the ambiguous language of NEPA which potentially included assessment of policies, plans and programmes by referring to, *'major Federal actions significantly affecting the quality of the human environment'* (United States of America Government, 1969, Sec.102, 2(C)), leaving the door open from the outset to some form of strategic assessment (Bina, 2007; Fischer and Seaton, 2002; Smythe, 1997). Beyond the US's policy-making, we can include several other influences on the development of SEA, including principle 17 of the Rio Declaration which calls for EIA of *'proposed activities'* (United Nations Conference on Environment and Development, 1992), Agenda 21 and the United Nations Economic Commission for Europe *Protocol on SEA* (Jones et al., 2005; Sadler and Verheem, 1996).

Although early legislation elsewhere (like NEPA) did not clearly distinguish between project and strategic impact assessment, crucial to much of the analysis of SEA is a specific understanding of the way it developed, in the EU at least, through and in response to EIA (Bina, 2007). For the UK, therefore, the development of SEA is very closely related to the development and legislation in the EU through the EIA Directive (originally 85/337/EEC, followed by three amendments and a codification through 2011/92/EU with a follow-up amendment in 2014 through 2014/52/EU) and Directive 2001/42/EC (the SEA Directive). Development of SEA within the EU can be described as the result of desires to overcome perceived shortcomings in established EIA practice (for example the foreclosure of options and alternatives at the project stage and better consideration of complex, cumulative or synergistic impacts), to introduce more strategic thinking, to represent the environment and to promote sustainable development (Hayes et al., 2017; Morrison-Saunders and Fischer, 2006; Partidário, 2000). While there is considerable overlap between these drivers; important to our discussion is how they acted to shape the objectives *for*, *of* and *in* SEA enshrined in the SEA Directive (and extended in the UNECE SEA Protocol, in particular with explicit requirements for screening, the consideration of health and trans-boundary consultations) and the resulting SEA legislation and systems produced. Of particular importance in the EU context is that the SEA Directive covers only plans and programmes, leaving the most strategic tiers (policies and legislation) out (even though the necessity to assess the latter is mentioned in the SEA protocol, adding 'where appropriate'). Taking a system's approach to SEA in which coverage of all decision-making tiers is thought to be essential for being able to develop effective SEA means that the seeds for failure were planted when it was first released (Fischer, 2006).

The objectives-led approach to impact assessment can take several forms. Generally speaking, the use of objectives aligns with calls for impact assessment to be more proactive. In this vein, therefore, objectives-led assessment is looking to understand how a policy, plan or programme contributes to pre-determined objectives (Hayes and Fischer, 2015; James, 2001; Pope et al., 2004). The reasons for objectives to feature so strongly in the UK approach are connected with preferences of the UK Government, as expressed through, for example, associated guidelines. It is also important to note that the UK's experience with SEA is not uniform, as each of the devolved administrations (the UK Government for England, the Northern Ireland Assembly, the Scottish Government and the Welsh Government) is responsible for legislating on the various EU Directives related to impact assessment. Moreover, although the EIA and SEA Directives have been hugely influential on the practice of SEA in the UK, practice in the UK pre-dates these European milestones and so is mixed with its own 'pre-directive' history and practice development.

Jackson and Illsley (2007) described the variation in practice across the UK and the distinction in practice types. In this context, the objectives-led approach – predicting the potential for a policy, plan or programme to move towards one's objectives – can be contrasted with the baseline-led approach – predicting the impacts of the policy, plan or programme on the baseline situation. The

same authors further noted that the SEA Directive can be understood as generally EIA based and baseline-led, and this is reflected in the title of the SEA Directive, '…*assessment of the effects of certain plans and programmes on the environment*' (European Parliament and the Council of the European Union, 2001a, L.197/30).

Policy-makers in the UK, and particularly England, have favoured an objectives-led approach which can be based around the country's sustainable development objectives. Furthermore, this approach was in line with existing practice when EU Directive based SEA was introduced (Jackson and Illsley, 2007). The UK had been developing a process of Environmental Appraisal for planning documents throughout the early 1990s and had considerably reviewed the success of the approach, eventually publishing *A Good Practice Guide to Sustainability Appraisal of Regional Planning Guidance* in 2000 and introducing Sustainability Appraisal (Department for Communities and Local Government et al., 2010; Hayes, 2013; Thérivel and Fischer, 2012; Jackson and Illsley, 2007; Therivel, 1998; Wood, 2003). The introduction of Sustainability Appraisal just before the SEA Directive had to be transposed, brought the objectives-led approach to the UK and coincided with UK devolution. As a consequence, practice of SEA has varied between the four nations of the UK from the outset. Practice in England and Wales has remained more closely aligned as a result of the way devolution unfolded, although Welsh practice has increasingly been in the hands of the Welsh Government, bringing potential for further divergence. Practice in Northern Ireland also reflects its unique devolution arrangements. Scotland, in particular, has demonstrated a desire to utilise SEA for novel purposes and as such demonstrates greater divergence (Esson et al., 2004). In this context, Scotland has expressed the desire to be a world leader in SEA (Fischer et al., 2018).

The following sections unpick and expand our discussion of objectives *for*, *of* and *in* SEA. The development of SEA and SEA objectives are part of multiple interrelated debates around contested topics such as environmental protection and sustainable development, but also more technical discussions around tiering of decision-making and strategic thinking. These debates influence the objectives *for* SEA. Shaping our understanding of the purpose of SEA and subsequently why practitioners are engaged in conducting SEA. Such debates and concepts also carry influence through to the objectives *of* SEA, informing how objectives are scoped in or out, how they are phrased and how they are used. Finally, that influence also continues to the objectives which are *in* SEA. This point of discussion is distinct from the objectives *of* SEA in that here we turn to consider the objectives being subjected, or not, to SEA – i.e. the objectives of policies, plans and programmes themselves. This final consideration aims to discuss the reach of SEA and its relationship with the policies, plans and programmes it is able to scrutinise. Finally, we present some overarching conclusions.

Objectives *for* SEA

We start this section by reflecting on the objectives held *for* SEA. Ultimately, this is about the purpose or mission set for SEA and, as noted, in this context it is important to look to the EU's SEA Directive which has been particularly influential in the UK (as in most other EU member states; see Fischer, 2006 and Chapter 20 by Koshkar et al., 2020). The European Commission, in drafting the SEA Directive, defined the objectives for SEA in Article 1 as follows;

> The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment. (European Parliament and the Council of the European Union, 2001a, L.197/32)

This statement establishes two main objectives for SEA, one substantive and one procedural. The first one revolves around the protection of the environment and the second one around the integration of the environmental considerations into plan and programme preparation with a view to the promotion of sustainable development. In transposing the Directive into UK legislation and regulation, as well as into guidance, the UK's objectives for SEA have been codified further. Box 3.1 provides a selection of statements that express objectives for SEA drawn from across the UK.

Box 3.1: Objectives, aims and justifications for SEA collected from a selection of guidance documents from across the UK.

The joint UK guidance document *A Practical Guide to the Strategic Environmental Assessment Directive:*

> Article 1 of the Directive states that its objective is "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development". These aims are consistent with a range of Government policies on the environment and sustainable development. (Office of the Deputy Prime Minister et al., 2005, p.9).

The UK Ministry of Housing, Communities and Local Government webpage *Guidance: Strategic environmental assessment and sustainability appraisal:*

> Its [Sustainability Appraisal incorporating SEA] role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
> …
> Sustainability appraisal and strategic environmental assessment are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. (Ministry of Housing Communities and Local Government, 2019).

The Northern Ireland Department of Agriculture, Environment and Rural Affairs webpage *Strategic Environmental Assessment:*

> Strategic Environmental Assessment (SEA) is a system of including environmental considerations into certain plans and programmes at an early stage of the programme or plan development. (Department of Agriculture Environment and Rural Affairs, 2016).

The Scottish guidance document *Strategic Environmental Assessment Guidance:*

> SEA can provide a valuable opportunity to identify and address the environmental implications of public plans. SEA processes can help plan-makers to consider how to deliver a plan differently, in order to achieve better environmental outcomes, while still delivering important plan objectives. (Scottish Government, 2013, p.4).

The Scottish Government webpage *POLICY: Environmental assessment:*

> SEA helps to better protect the environment, aims to ensure that any development is sustainable, and increases opportunities for public participation in decision-making. (Scottish Government, 2019a).

The Welsh Government webpage *GUIDANCE: Strategic Environmental Assessment:*

> The aim of SEA is to:
> - provide a high level of protection to the environment
> - promote sustainable development
> - integrate environmental considerations into the preparation and adoption of a plan or programme. (Welsh Government, 2019).

These statements provide the springboard for a discussion of three important aspects of the objectives *for* SEA. We start by reflecting on the central role of the definition of sustainable

development, given the position of the concept as one of the primary objectives for SEA. We then consider the 'strategic-ness' of assessment as an objective. Finally, we consider the complex and multifaceted nature of objectives for SEA. Rather than a simple, solitary objective, SEA is tasked with multiple objectives, some potentially conflicting or at the very least complicating its application.

The alignment to a particular definition of sustainable development or sustainability and the impact this has on SEA practice is crucial to understand the objectives held for SEA (Eales and Sheate, 2011). Occupying such a dominant space in the fundamental objectives for the process means that the definition of sustainable development any system or application of SEA is aligned with is incredibly influential (Hacking and Guthrie, 2008; Owens and Cowell, 2002). Definitions of sustainable development reveal a great many attempts to express the concept, and even where some consensus does exist, for example around the Brundtland definition, this conceals considerable variation in associated interpretations. Definitions can express a range of views aligned from 'weak' to 'strong' sustainability, incorporating variation on the necessary protection of natural capital, substitution between capital stocks and the acceptability of trade-offs (Des Jardins, 2001; Gutés, 1996; Jabareen, 2008; Nilsen, 2010; Morrison-Saunders and Fischer, 2006; Owens and Cowell, 2002). One of the implications of setting sustainable development as part of the objectives for SEA is that SEA must confront the complexity of the concept; engaging with possible ambivalence, uncertainty, contested knowledge and conflict (Newig et al., 2007; Fischer et al., 2010).

Scotland offers a good example of a system which has had strong political support for SEA and a commitment to utilising SEA to progress the achievement of high-level objectives (Scottish Government, 2011). McLauchlan and João (2011), however, highlighted the potential for contradiction in the list of high-level policy objectives set for SEA. Indeed, they evaluated Scotland's commitment to promoting environmental justice through SEA, concluding that the goal remained utopian as SEAs in Scotland were neither focused specifically on environmental justice nor had a way of measuring it indisputably. Moreover, their analysis of Scottish guidance at the time of their study (2004/2007) found that the Scottish guidance in comparison to broader UK guidance was in fact focused away from certain aspects of environmental justice such as health inequalities. They also noted that while the professional literature suggests that forms of GIS or distributional analysis should be used to evaluate environmental justice, SEA practice in Scotland typically did not follow such techniques. Instead they found practice utilised SEA objectives, attempting to cluster complex elements of environmental impact into a relatively short list of objectives to be used as a structure for assessment of likely progress.

In addition to the complexities involved in attempting to align SEA to a particular definition of contested concepts such as sustainable development or environmental justice, we also consider the strategic nature of SEA. In some respects, we can understand the strategic elements as a result of desires to move impact assessment up the decision-making hierarchy in a tiered system, and a desire to overcome failings of EIA at the project level (Fischer, 2007; Morrison-Saunders and Fischer, 2006; Partidário, 2000). While these ideas provide some of the logic for the development of SEA as part of the EU SEA Directive, being strategic should be more than a description of the scale or tier of policy-, plan- or programme-making. The strategic objective of SEA should refer to the ability of SEA to be involved in the early stages of policy, plan or programme development in order to influence its strategic direction (Bina, 2007; Noble, 2000). Noble and Nwanekezie (2016) concluded that a continuum from less to more strategic can help to capture more recent thinking of SEA, but also argue that SEA needs to be more strategic in order to more meaningfully assess and influence policies, plans and programmes and the governance arenas which shape them. Partidário (2020)

offers a fuller interpretation and discussion of strategic SEA in Chapter 4 of this book and we return to this point in the section 'Objectives *in* SEA'.

Finally, it is important to consider the objectives that exist and have contributed to the logic for SEA, including an earlier consideration of the environment, strategic thinking, overcoming failings of EIA, good governance and consideration of complex impacts such as cumulative, long-range or synergistic (Fischer, 2007; Hayes et al., 2017; Morrison-Saunders and Fischer, 2006; Partidário, 2000; Wood, 2003). Eales and Sheate (2011) argued that SEA, particularly as established through the EU SEA Directive, follows a dual purpose; (1) being an advocate for the environment and (2) attempting to integrate environmental with social and economic considerations to achieve decisions which better reflect sustainable development.

The existence of multiple objectives for SEA can impact on the position SEA occupies in policy-, plan- and programme-making. Objectives include, for example: information provider, advocate or representative of the environment, integrator of environmental considerations into decision-making and knowledge broker (Cashmore et al., 2007; Fischer, 2007; Scrase and Sheate, 2002). These various objectives place SEA in different positions or require different modes of acting. From employing rational or technocratic models of information provision to positions requiring less neutrality such as to act as advocate for the environment. Debate has recognised the problems of assuming or adopting a position of rationality or neutrality in an inherently complex, contested and uncertain field tied to sustainable development (Fischer, 2003; Kørnøv and Thissen, 2000; Weston, 2004). Lobos and Partidário (2014) noted that the field has arguably shifted from conceptions of rational SEA to more deliberative and collaborative conceptions – taking better account of the way in which SEA is able to influence decision makers (Hayes, 2019).

Although there have been shifts in SEA thinking, practice must still grapple with multiple objectives, the potential conflict and tension between them and the positions they require. In particular, it is important to consider how pragmatic objectives, such as achieving regulatory compliance, sit alongside more (strategic) deliberative and collaborative approaches. This means there are potentially contradictory incentives for practice (Hayes et al., 2017).

In summary, it is important to recognise the complexity of objectives *for* SEA. In this context, the influence of definitions of sustainable development, the complexity of being strategic as well as the potential for conflict and tension between simultaneously held objectives are of particular importance.

Objectives *of* SEA

Subsequently, we will discuss the objectives *of* SEA. These are the objectives used as the driving force of an objectives-led SEA methodology. Furthermore, we will elaborate on how they function.

First, we consider guidance relevant to SEA application from different parts of the UK. The legislative landscape which transposes the EU SEA Directive in the UK is relatively complex. As noted above, the matter is devolved to the four nations of the UK. This is further complicated by the (Town and Country Planning related) practice of Sustainability Appraisal incorporating SEA commonly applied in England and Wales. However, this text is not aiming to provide an overview of the intricacies of UK legislation, suffice to say that multiple jurisdictions create a complex landscape. Box 3.2 presents a selection of extracts highlighting the manner in which objectives are presented to practitioners in the UK through SEA guidance. We see objectives here presented as the means by which policies, plans and programmes are tested. These are specific objectives drawn up for the SEA as part of the process of scoping for potentially significant impacts, rather than, for example, existing national

environmental objectives. National objectives may well feature, but the list of SEA objectives used is typically bespoke to the particular policy[1], plan or programme which is assessed.

Box 3.2: Extracts from guidance drawn from various parts of the UK on the use of SEA objectives

The joint UK guidance document *A Practical Guide to the Strategic Environmental Assessment Directive:*

> Develop SEA objectives: To provide a means by which the environmental performance of the plan or programme and alternatives can be assessed.
> …
> Testing the plan or programme objectives against the SEA objectives: To identify potential synergies or inconsistencies between the objectives of the plan or programme and the SEA objectives and help in developing objectives alternatives. (Office of the Deputy Prime Minister et al., 2005, p.24).

The UK Ministry of Housing, Communities and Local Government webpage *Guidance: Strategic environmental assessment and sustainability appraisal:*

> It [the scoping stage] should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives. (Ministry of Housing Communities and Local Government, 2019).

The Scottish guidance document *Strategic Environmental Assessment Guidance:*

> STRATEGIC ENVIRONMENTAL ASSESSMENT OBJECTIVES
> The review of relevant environmental objectives can be used to construct a framework of objectives against which a plan can be assessed. This can identify whether a plan supports wider environmental objectives or whether there are any environmental gaps. Alternatively, objectives could focus on the most relevant local environmental issues, derived from engagement. (Scottish Government, 2013, p.26).

From Box 2 we see that the practice of drawing up a specific set of SEA objectives with which to test and evaluate an emerging and developing policy, plan or programme is commonplace in UK practice. This places SEA objectives, used to structure the assessment itself, in a central position and influential on practice and the results of SEA. Regulations and guidance produced in each nation of the UK provide direction on the sorts of topics which should be covered and codified as objectives. Each SEA process should involve its own scoping exercise to identify the most important issues to be included.

Given the influential position of SEA objectives in the objectives-led approach to impact assessment, research has identified that vague and poorly worded objectives can reduce the potency of the assessment (Gibson et al., 2005; Newig et al., 2007; Pope et al., 2004). Moreover, different types of objectives have been found to vary in their clarity. For example, Morrison-Saunders and Fischer (2006) found that economic objectives were often worded with sufficient clarity, while environmental objectives offered much more scope for interpretation. This is particularly difficult for systems such as that employed in England and Wales where Sustainability Appraisal is used to incorporate SEA as the breadth of objectives is typically wider to cover overt social and economic aspects as well as environmental issues. Ultimately, while evidence has been found that SEA does have an effect on the policies, plans and programmes assessed (see e.g. Therivel and Fischer, 2012; Phylip-Jones and Fischer, 2015) there is debate about the strength of this influence (Fundingsland Tetlow and Hanusch, 2012). Furthermore, various authors have established that in the UK SEA often

[1] Scotland is the only nation in the EU to include requirements to assess policy, following the SEA Directive. This will be discussed further below.

leads to marginal changes only (Hayes, 2013), revolving around, for example, particular wording of development policies (Kidd et al., 2011).

Next to debates that highlight the strength, or weakness, of objectives set within SEA as a means of evaluating policies, plans and programmes, questions have also been raised about the scope of SEA. This is particularly relevant in Scotland where SEA has more specifically focused on the environment in all situations of application. McLauchlan and João (2011) and Jackson and Illsley (2007) noted this, drawing attention to the conditions which led to this focus. As Scotland drew together its position and developed its legislation on SEA, political will coalesced around using SEA as a way of promoting environmental justice and tackling environmental issues. This placed an emphasis on interpreting the SEA Directive and its proposed topics from an environmental perspective to the exclusion of social and economic considerations (McLauchlan and João, 2011). Considerable debate has been had on the appropriate breadth of objectives, contrasting systems like SEA with Sustainability Appraisal/Assessment (Tajima and Fischer, 2013; Morrison-Saunders and Fischer, 2006; Smith and Sheate, 2001).

The use of objectives as the building blocks of SEA clearly places them in a central position. As we have noted this raises issues to do with their strengths or weaknesses, the clarity of their expression and their breadth. Clearly when attempting to articulate objectives around contested concepts and topics such as sustainability, sustainable development and environmental issues, this is bound to be fraught with complexity. Practice, therefore, needs to engage robustly and openly with issues of concept definition, wording, clarity and breadth. The development, construction and use of objectives is consequently not a simple process and should be considered as part of the wider political discussions which shape sustainability and environmental debates.

Objectives *in* SEA

We now turn our attention to the objectives *in* SEA. Here we are thinking about the objectives of policies, plans and programmes themselves to consider how these objectives are subjected, or not, to analysis as part of SEA.

The first point of this discussion focuses on the potential for conflict between SEA objectives and the objectives of a policy, plan or programme. Eales and Sheate (2011) outlined an excellent example of this drawing on the second Scottish National Planning Framework and its SEA. This case exemplifies a conflict which the practice of SEA is aiming to resolve in many ways. The National Planning Framework objective 'sustainable economic growth', largely delivered through a series of national transport and energy development projects, was found to conflict with SEA objectives. Eales and Sheate's (2011) analysis highlighted that the National Planning Framework and its SEA struggled to reconcile sustainable economic growth with SEA objectives on tackling climate change and biodiversity. They argued that this failing stems from a lack of truly strategic thinking as the process was back to front, with a list of projects driving the National Planning Framework rather than the converse. This, unfortunately, is not an exceptional case, as this phenomenon has been observed on many other occasions (see Fischer, 2006). In this scenario, perhaps it is not surprising that SEA was not especially effective. However, and in line with the concept of a tiered approach to SEA (see Marshall and Fischer, 2006), this maintains the possibility that had the process been more strategic, perhaps thinking more spatially and nationally before going on to identify projects, then the conflict could have been overcome.

As well as difficulties associated with dealing with conflicts between SEA objectives and policy, plan and programme objectives, it is important to acknowledge that for practice in much of the EU and most of the UK (Scotland being the exception), policies are excluded from SEA. The SEA Directive

specifically only includes *'certain plans and programmes'* (European Parliament and the Council of the European Union, 2001b) and this is largely reflected in UK practice. As we have noted, part of the logic for the expansion of impact assessment to the strategic tier stemmed from identified failings at the EIA project level including the foreclosure of options and alternatives (Eales and Sheate, 2011; Fischer, 2007). This is related to long held evidence that EIA should be conducted early in any process to be most effective (Feldmann et al., 2001; Sheate et al., 2003). In this regard, the SEA Directive partially responded to such criticism by implementing impact assessment earlier in an assumed tiered decision-making process. However, it is important to acknowledge the limitation created by the exclusion of the policy tier - as this leaves the policy-making tier, which will feed into lower tiers, unscrutinised by SEA. The ramifications of this are discussed further later in this section. This limitation was acknowledged by the UNECE SEA Protocol to the Espoo Convention on EIA in a transboundary context. As a consequence, the consideration of policies and legislation was included.

Despite the limitation identified, Scotland in particular provides an example of an SEA system which has arguably been expanded to include the policy tier. The *Environmental Assessment (Scotland) Act* 2005 broadened the reach of SEA to include what can be considered policies by including all plans, programmes and strategies with a 'public character' within the legislation (Scottish Government, 2005). The Act requires 'pre-screening' of effectively all public sector policies, plans or programmes for their potential environmental impacts and for those determined to have significant impacts to be subject to SEA (Jackson and Illsley, 2006). In a review of Scottish practice, the pre-screening procedures were not found to be used inappropriately to screen out qualifying plans, programmes or strategies (Scottish Environment Protection Agency, 2011). Moreover, the expansion has been generally positively experienced in Scotland, perhaps related to the political commitment and institutional support provided by the SEA Gateway and SEA Forum (Hayes et al., 2017). As an example of the policy tier being subject to SEA in Scotland, revisions to the Planning system itself through the *Planning (Scotland) Act* 2019 have been subject to SEA, as well as many other areas of policy being pre-screened with reports made available through the SEA Gateway (Scottish Government, 2019b). For example, Fischer and Phylip-Jones (2007) described the application of SEA to a particular policy case, the development of the Fife Supplementary Planning Guidance for Renewable Energies.

As well as considering the inclusion or exclusion of the policy tier from SEA scrutiny, it is also important to consider how this trickles down and has implications for lower tier plans and programmes. One such implication is codified by the regulations for SEA in England which formalise the subjugation of SEA alternatives to plan or programme objectives – beginning what we argue is a process of formally excluding SEA from the examination of the fundamental objectives of plans and programmes:

> (2) The report shall identify, describe and evaluate the likely significant effects on the environment of—
>
> (a) implementing the plan or programme; and
>
> (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme (UK Government, 2004, p.7)

The requirement for reasonable alternatives of SEA to take account of the objectives of the plan or programme, while carrying a clear practical logic in a tiered system, does result in the objectives of a plan or programme often going unscrutinised by SEA. A recent example are housing targets, based on population growth projections that no-one appears to be questioning. Moreover, because, for example, plan and programme objectives are often set in train by higher tier policies, which in England are unlikely to have been subject to SEA, these aspects of plans and programmes are

effectively outside of the SEA process. This potentially undermines the ability of SEA to truly assess and promote sustainable development, as SEA is not allowed to consider whether the objectives of a plan or programme are likely to lead to significant environmental impacts. Developing from EIA, particularly in the EU where the SEA Directive takes a similar approach as the EIA Directive, also has implications for the objectives which are considered within and outwith the reach of SEA. As Eales and Sheate (2011) argued, as SEA history is rooted in EIA, it is targeted at reducing adverse impacts and enhancing benefits, rather than questioning the fundamental logic or objectives of a plan or programme.

In addition to policy, plan and programme objectives being formally outside of SEA scrutiny, there is also evidence that certain topics, alternatives or options are placed out of the scope of SEA through political unacceptability (Hayes, 2019). Indeed, Fischer (2005) similarly concluded that understanding how SEA can have an impact on policies, plans and programmes, requires an understanding not just of procedure, or what the objectives are, but also of the context in which they operate. A constrained space for discussion of certain ideas has been noted in relation to the planning system in general (Allmendinger and Haughton, 2012; Bidstrup and Hansen, 2014; Owens and Cowell, 2002), and we see evidence that SEA is also subject to this constraint, rather than necessarily being a tool to encourage novel or difficult discussions (Fischer, 2007). When combined with an incomplete application of SEA to all tiers of decision-making and with the tiered structure itself, which can create long-term commitments from one tier to the next, it is argued that certain aspects of policies, plans and programmes could be described as effectively 'off the table' (Hayes, 2019).

With this in mind, and considering, for example, the climate emergency declarations of the UK Government and local authorities around the UK (Cowburn, 2019), the question arises whether SEA should challenge more strongly some of the objectives driving policies, plans and programmes. As the example drawn from Eales and Sheate (2011) highlights, challenging and squaring environmental and economic objectives requires tools like SEA, and policy-, plan- and programme-making itself, to take a more strategic outlook. If some policies, plans and programmes, objectives or topics are excluded from SEA then, we would argue, the tool is diminished in its capacity to contribute to high-level objectives and grand challenges.

Conclusions

Through this chapter we have considered the objectives *for*, *of* and *in* SEA with a view to developing a better understanding about the various ways objectives feature in SEA practice.

Considering objectives *for* SEA, we reviewed the literature and discussed ideas which show some of the grand objectives SEA has been tasked with, such as sustainable development and environmental justice. We have noted the considerable influence that definitions of such contested concepts inevitably play when a system of SEA is aligned to them. Moreover, we see the difficulty of aligning an SEA system to complex and contested concepts like sustainable development. However, what we do see is a need for strategic considerations to be part of SEA practice.

In thinking about the objectives *of* SEA, we noted research that shows environmental objectives can often be poorly worded and vague, and less able to stand against more strongly worded economic objectives. We've also highlighted the variation and difficulty in establishing the appropriate breadth of objectives for a system aiming at sustainable development. Much of this is reflective of the position SEA objectives occupy, far from being simple procedural elements of the process, they are tied to wider sustainability, environmental and political debates.

In our final view on SEA objectives we have considered policy, plan and programme objectives *in* SEA. The potential for conflict between SEA objectives and policy, plan and programme objectives has been identified, also the difficulty of reconciling such conflicts and the role for strategic thinking in overcoming them. Crucially for this discussion we have also focused on objectives excluded from SEA. The exclusion of the policy tier in many instances, we argue, undermines the ability of SEA to holistically consider all relevant impacts of decision-making. Scotland provides an interesting example of bringing that tier within the remit of SEA. We have also noted how other factors, such as legislative requirements and political unacceptability serve to effectively take certain topics, options or alternatives off the table or out of SEA scrutiny. Complex issues of practicality need to be weighed against a desire to truly scrutinise the objectives of policies, plans and programmes.

Objectives and SEA clearly relate in multiple ways, but this exploration, we hope, has highlighted not only some of the details of how objectives feature *for*, *of* and *in* SEA, but also how issues of practice are situated within wider debates of politics, sustainable development, policy-, plan- and programme-making, and decision-making.

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