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## **Abstract**

According to the published literature, for SEA to make a meaningful difference, it should be integrated into planning processes. Yet, in situations and contexts where the two processes appear to be disjointed, SEA could be applied upon conclusion of the plan-making process justifying decisions already made, or just before a decision can be made to comply with existing legal requirements. Where this is the case, then what is SEA really for?

This paper aims to reflect on the usefulness of SEA, and explore whether a shift of focus from actual effectiveness to perceived effectiveness could help further legitimise the need for SEA. This is done by looking at SEA practice in Italy as a case-study, as the country's diverse regional set-up presents situations in which SEA may appear to be avoided because perceived as not very useful or where SEA may appear to be functioning and actually effective.

## **Keywords:**

Usefulness, actual effectiveness, perceived effectiveness, SEA, Italian regions

## Introduction

Strategic Environmental Assessment (SEA) is a decision support instrument for policy- and plan-making. As an advocate tool for the environment, SEA aims to re-orient, structure and shape strategic planning processes towards the achievement of more environmentally, socially and economically sound and sustainable decisions. This is based on the premise that for SEA to make a meaningful difference, it should be integrated into planning processes (Stoeglehner *et al.*, 2009; Nitz and Brown, 2001; Thérivel and Minas 2002). Yet, in situations and contexts where the two processes appear to be disjointed or disconnected, SEA could be applied upon conclusion of the plan-making process justifying decisions already made (Gazzola *et al.*, 2004), or just before a decision can be made mainly to comply with existing legal requirements (Van Buuren and Nootboom, 2010). Further, SEA could be politically or technically avoided altogether possibly because of disinterest, disbelief or even resistance to SEA or lack of ownership of the SEA process (Nitz and Brown, 2001; Stoeglehner *et al.*, 2009; Kørnø and Thissen, 2000). Where this is the case, then what is SEA really for?

A number of scholars have already explored this question from different angles (Runhaar and Driessen, 2007; Fischer and Gazzola, 2006; Stoeglehner *et al.*, 2009), which has resulted in a considerable body of published work on SEA effectiveness (Bina *et al.*, 2011; Fischer and Onyango, 2012; Gazzola *et al.*, 2011; Marsden, 1998; Runhaar, 2009; Smith *et al.*, 2010; Therivel and Minas, 2002). It is widely agreed that the effectiveness of SEA is determined by its ability to influence, support or change decisions (Retief, 2007). However, as noted by Van Buuren and Nootboom (2009), the actual impact of SEA on the content of a policy, plan or programme – or the extent of influence, support or change it is able to exert on decisions - is often unclear and difficult to determine, as policy choices and stakeholders' views evolve in time, and new information is added to the process. Without being able to make this determination, establishing SEA's effectiveness becomes challenging, if not uncertain. The definition provided by Bina *et al.* (2011) captures the level of uncertainty associated with determining the effectiveness of SEA. They define effectiveness as “an adjective indicating that something is ‘adequate to accomplish a purpose; producing the intended or expected result’ or that something is ‘actually in operation or in force; functioning’, as opposed to something being ‘useless’ or ‘futile’” (Bina *et al.*, 2011: 573). Though many remain supportive of the view that if effectively applied and actually integrated into planning processes SEA can accomplish its purpose and improve the sustainable development-directedness of decision-making (Hacking and Guthrie, 2008), evidence demonstrating its added value, functioning or usefulness still remains challenging to provide (Wallington *et al.*, 2007).

Effectiveness studies to date have mainly focused on case analyses, looking particularly at the process(es) and output(s) of an SEA; or at the criteria or contextual conditions needed to facilitate the integration between SEA and planning processes at various levels (Eggenberger and Partidario, 2000), and recommended for the delivery of a successful or well-functioning SEA (Runhaar, 2009). More recently, a review of the international published literature on SEA effectiveness suggests that there are a growing number of studies exploring the significance of learning in SEA (Jha-Thakur *et al.*, 2009), but with still little emphasis on the reflective and reflexive elements of SEA as a wider evaluative experience. The focus of these studies appears to be more on the extent to which SEA is *actually* fulfilling or accomplishing its purpose(s), and less on the extent to which SEA is *perceived* to be effective, believed to be functioning and overall useful. But following the definition provided by

Bina *et al.* (2011), can an SEA that is *actually* in operation, in force or functioning be considered effective, even if it is not perceived to be useful? Jones *et al.* (2005) recognise that even with motivated efforts actual effectiveness is difficult to achieve, without there being a cultural shift and belief in the added value of SEA, or in its usefulness.

This paper aims to reflect on the usefulness of SEA, and explore whether a shift of focus from actual effectiveness to perceived effectiveness could help further legitimise the need for SEA, and consolidate its application as instrumental for improving the sustainability of policy- and decision-making. This is done by looking at SEA practice in Italy as a case-study within the EU context, as its diverse regional set-up offers situations in which planning and SEA processes may appear to be disjointed or disconnected, where SEA may appear to be avoided altogether, or where SEA may appear to be functioning and perceived to be actually effective. Prior to introducing the case-study methodology, the next section elaborates further on the idea of usefulness, and on how it could be applied to SEA.

### **Usefulness in SEA**

Relying on dictionary definitions provides a helpful start to this section and to the unfolding of this concept. The Merriam-Webster dictionary defines usefulness as “the quality of having utility ...”, which could be likened to something that is purpose-oriented such as SEA, or that is in operation; but the definition also specifies that the usefulness of something must have “... practical worth or applicability”. “Practical worth” here might suggest that that something must do more than just function and be in operation, and generate impact that is not only actual, but also practical and perhaps believable or perceived to be believable in practice. The Cambridge Dictionary acknowledges and distinguishes the perceived from the actual advantages of something, as it defines usefulness as either the quality *or* state of being useful. If applied to SEA, this definition substantiates the idea that actual effectiveness and perceived effectiveness might not always go hand in hand, as suggested in this paper.

Generally speaking, as humans we use “things” that we perceive to be useful for enhancing or improving the way we are, the way we operate, or to add worth or better manage specific issues or circumstances. Assuming this as a postulate, the usefulness of something is likely to play a crucial role in determining our willingness to use and rely on that something. More specific applications of this understanding of “usefulness” can be found in various fields of study. In philosophy, for example, Nietzsche (1980) reflects on the usefulness of history for human life, and identifies three typologies of usefulness which should be taken into account for improving societal decisions. Monumental history or function of history is useful for identifying inspiring models for understanding contemporary challenges and issues. The usefulness of the antiquarian view of history is in its capacity to appreciate the past, both in terms of its strengths and weaknesses, to then be able to build on and envision a future reassured that “things” or events that happen in the present are justified, because linked to a chain of events extending from the past. Finally, the critical view of history emphasizes the importance and usefulness of critical reflection, as the best way for generating new knowledge which can aid growth and progress. This function of history can empower humans with “... a new habit, a new instinct, a second nature so that the first nature withers away” (Nietzsche, 1980, p.22). Based on Nietzsche’s perspective, the usefulness of something could therefore be associated with the type of function or utilization that that something can (be

perceived to) provide, rather than “just” the mere observation of facts and events. Thus, history may be considered useful when it is perceived to improve or add worth to contemporary society. Similarly, the Danish philosopher Kierkegaard (Patios, 2014a) suggests that the usefulness of history is not in the scientific accuracy of knowing past events or sequences of data, rather it is about how past knowledge is perceived and used to make a choice for the future (I Coll, 2012, Patios, 2014b). This understanding seems to support the distinction between ‘things’ or events that are actually useful, and ‘things’ and events that are perceived or believed to be useful, regardless of whether scientifically accurate or not. In social capital studies, Ousama *et al.* (2011) have considered how stakeholders are more likely to consider processes of knowledge exchange useful, if they are conducted in an efficient manner and generate useful results. According to this view, usefulness is associated with the ability to trigger actions. For Pachi and Barrett (2012, p.345) “The perceived effectiveness of specific forms of political and civic action is important ... because the perceived effectiveness of a particular form of action is likely to be a significant predictor of an individual’s willingness to undertake that action”. A similar understanding is applied in education studies, where Fan (2003) highlights how students generally apply the learning strategy that they perceive to be more useful for learning a specific topic.

The published environmental assessment literature does not make explicit references to usefulness, though as previously mentioned, it does engage with the term effectiveness. References are made to the advantages, benefits or importance of SEA (Runhaar and Driessen, 2007), which are often associated to the purposes, expected results or actual functioning of an SEA. But there is less evidence about the way in which SEA is perceived to be functioning and belief in the practical worth and usefulness that it can provide. Integration between the SEA and planning process has been portrayed as an essential condition for the actual functioning of SEA, and for the achievement of effectiveness (Kirckpatrick and Lee, 1999; Eggenberger and Partidario, 2000). The importance of this condition is also reflected in the EU SEA Directive, particularly in article 4(1), article 9 and article 4(2) (see EC, 2001). However, the integration between SEA and planning processes could be hindered by a number of limitations which may not only impact the achievement of SEA’s “actual effectiveness” but also its usefulness (“perceived effectiveness”). Equally, the ability of SEA to fulfil its purposes, thus to support decision- and plan-making processes for sustainable development and change or improve plans and programmes so that they are more environmentally, socially and economically sound, might also be affected. Subsequently, to develop a better understanding of SEA’s usefulness, the limitations or issues affecting its ability to meet its main aim and purpose, are explored in more detail, drawing on the international SEA literature.

#### *Limitations affecting SEA’s usefulness*

The Collins English Dictionary defines limitation [of something] as the act or process of controlling or reducing that something. In the SEA context, limitation could therefore refer to a set of problems which prevent SEA from being able to improve the quality of planning decisions. This is quite a simplistic definition, as debates about limitations in SEA cover a wide range of issues, including procedural and technical problems, administrative and/or organisational deficiencies, and political constraints, affecting the likely achievement of procedural, institutional and policy forms of integration respectively.

From a procedural perspective, poor or lack of public participation is likely to hinder the success of SEA. The public's access to the SEA process is considered a core element of Directive 2001/42/EC. In the 15<sup>th</sup> preliminary consideration, the Directive clearly states that "... the public are to be consulted during the assessment of plans and programmes, and that appropriate time frames are set, allowing sufficient time for consultations, including the expression of opinion". This is also reflected in the 1998 Aarhus Convention (United Nations Economic Commission for Europe, 1998). According to Reed (2008, p.2418) "participation in environmental decision-making is a democratic right". But it can also be instrumental for improving policy- and decision-making processes, as through participation the public can enhance environmental knowledge and help identify areas of negligence which require intervention (Beierle, 1999). Yet, the public might perceive their role and influence to be too weak to make any meaningful contribution to SEA. According to Gauthier *et al.* (2011, p. 51), this happens because of the level of confidentiality and complexity of policy-making processes which render them insufficiently open for public participation. The extent of participation occurring in SEA is regarded as limited (Zhang *et al.*, 2013), and taking place often when the contents of a plan or programme have already been defined (Gauthier *et al.*, 2011). Another procedural limitation portrayed in the literature is the development and consideration of alternatives. Several authors indicated that alternatives in SEA are either absent (De Montis, 2013; Fundingsland-Tetlow and Hanusch, 2012; Smith *et al.*, 2010) or that their development is weak, as they fail to propose improvements (West *et al.*, 2011).

Limitations of a more administrative nature are also likely to hinder SEA's ability to improve plan- and decision-making and its perceived usefulness. As previously indicated, the practice of SEA requires a multi- and interdisciplinary approach. Whilst on the one hand, relying on different skills' sets and knowledge-bases can enhance SEA's adaptability and responsiveness to the needs, type and nature of the policy, plan or programme to be evaluated; on the other hand, it may lead to process inefficiencies and technical difficulties, due to limitations of communication and of understanding between different expertise, applications and methods, between different actors with diverse interests and expectations from SEA, between departments within organisations who share SEA competencies and responsibilities for environmental protection and management. The participatory nature of SEA is often praised and recognised as being instrumental for dealing with many of these limitations by increasing the transparency of policy- and decision-making processes (Kornov and Thissen, 2000; McLaughlan and Joao, 2012). However, increasing transparency in decision-making may also be perceived as a threat to power relations by those who have hidden agendas and deliberately conduct negotiations in plan-making exercises in a rather obscured manner (see Scattoni and Falco, 2012).

#### *The usefulness of SEA in supporting plan- and decision-making processes*

Within the European context, it is generally agreed that the main aim of SEA is to increase environmental protection by ensuring that environmental considerations are integrated into planning processes (EC, 2001; Fischer, 2007). It is a decision-making support tool in that its role is to steer decision makers towards more sustainable choices (Sheate *et al.*, 2003). A number of studies have been developed to establish the extent to which SEA is actually fulfilling this role (Runhaar and Driessen, 2007; Fischer and Gazzola, 2006; Hilding-Rydevik and Bjarnadóttir, 2007), and at the way in which it is integrating with policy- and decision-making processes. Opportunities for integration might vary depending on the approach adopted, with integration through SEA occurring either at

different levels or in the judgment for final evaluation at the end of the assessment (Eggenberger and Partidario, 2000). However, for Lyhne (2011) integration between SEA and planning processes is difficult to achieve and is still regarded as a challenge that needs clarifying (Kornov and Thissen, 2000).

As a process affected by a multiplicity of interests, supporting decision-makers entails addressing environmental problems as well as providing a framework for understanding different perceptions about these problems and for providing technical solutions (Vicente and Partidario, 2006). For Runhaar (2009) SEA can achieve this by providing stakeholders with a space for deliberation, facilitating therefore a more reflexive approach to decision making, and possibly a more democratic one (Bonifazi *et al.*, 2011). However, it is also worth acknowledging that SEA is not immune from issues of power and from competing interests. On the one hand, it can mediate competing and powerful interests and values that are manifesting themselves within policy- and decision-making processes by enhancing transparency and by making the ethics of decision-making clearer (Richardson, 2005). On the other hand, when fulfilling this supporting role and exercising influence, SEA could potentially become itself a tool of power (Cashmore and Axelsson, 2013) that also contributes to forming power (Hansen *et al.*, 2013). This in turn is likely to affect perceptions about SEA, and about its usefulness.

From a more technical perspective, SEA can support decision-making by informing the process through the provision and collection of data (Joao, 2007). This information can be either new or of a particular type, e.g. on ecosystem services (Geneletti, 2011); it can entail experimenting with different methods, e.g. the development of land-use scenarios (Bragagnolo and Geneletti, 2014) or multicriteria assessments as a way of integrating engineering aspects with more social aspects (Naddeo *et al.*, 2013).

#### *The usefulness of SEA in changing or improving outcomes*

In contexts characterized by multiple competing interests and actors, changing or improving outcomes can refer to SEA's capacity to modify a policy or the views, beliefs or perceptions of the participants' to policy-making processes including those of decision-makers. Changing or improving outcomes is therefore intended in positive terms, as it expresses SEA's potential to generate new and/or improved knowledge; to directly or indirectly contribute to the achievement of more environmentally, socially and economically sound and sustainable decisions, and to the facilitation of mutual learning between public institutions and stakeholders. For Runhaar (2009, p.201) SEA's direct contributions may include "changes in decision-makers' awareness or understanding of environmental issues, changes in the extent to which such issues are considered in decision-making, conformities of formal decisions with the SEA report or physical changes in the environment". Indirect contributions are related to SEA's more proactive and iterative nature (*ibid.*), which allow for the realignment and readjustment of process outcomes and expectations through learning mechanisms once the positive changes (i.e. direct contributions) have been absorbed. As evidenced in the literature scholars are increasingly engaging with the concept of learning as "a vehicle for change", particularly in relation to public participation (Fitzpatrick and Sinclair, 2003, p.162; Webler *et al.*, 1995). To facilitate SEA through change, specialised skills are needed (Jha-Thakur *et al.*, 2009). Education has also proven to be a critical factor, as research from Sinclair *et al.* (2008) shows that in many cases participation is not capable alone to produce change in decision makers and

stakeholders' views. Critical is also the extent to which organisations are willing to broker knowledge and shift power to allow for the public to know, participate and influence the process (Partidario and Sheate, 2013); and more in general, the organisations' culture, beliefs and established traditions (Gazzola *et al.*, 2011).

## **Methodology**

This section presents the methodology adopted in this study. It introduces and justifies the selection of Italy as a case-study and presents a brief overview of the methods used for data collection and analysis.

### *Italy as a case-study*

Within the context of the EU SEA Directive, the road towards SEA implementation in Italy has been a rather tumultuous one (Zoppi, 2008), requiring multiple pieces of legislation. Legislative Decree (LD) n.152 "*norme in materia ambientale*" was adopted in 2006 and provides the main framework for environmental regulation in Italy, including regulations for SEA practice. A number of integrations followed. LD n.4/2008 produced several integrations mainly regarding screening (which plans are to be subjected to SEA), scoping (about the release of a separate document outlining the main issues to include in the SEA report), and the introduction of three distinct authorities in charge of proposing, prosecuting, and approving SEA. The implementation of the EU Directive in Italy was finally completed in 2010, with LD n.128/2010 (De Montis, 2013). Therefore, to fully comply with the European environmental assessment framework, the Italian government enacted three LDs (in 2006, 2008 and 2010).

Italy provides an interesting case because of its tiered SEA system with roles and responsibilities spread across a hierarchy of decision-making levels, including central, regional, provincial and local/municipality levels. Further, the Italian SEA context is emblematic because of the diversity of SEA approaches and experiences resulting from a mix of top-down agendas and devolved powers, which resulted in spatial and strategic planning competences being transferred from central government to Italy's 20 regional governments. Fifteen of Italy's 20 regions exert their legislative power within the framework defined by central government, while five regions and two provinces operate with special autonomy. Each regional context has developed therefore a different bureaucratic and procedural framework for the integration of both planning and SEA, leading to a highly fragmented yet diverse scenario.

In this study the regional level is chosen as a unit of analysis, and the usefulness of SEA is explored in 15 of Italy's regions; the five autonomous regions are excluded from the study because their special status does not allow for a comparative review. It was considered appropriate to focus on regions, as they enact laws and as competent authorities they are responsible for approving SEAs and plans at both, the regional and provincial level, and in selected cases, at the municipal level as well<sup>1</sup>. Through their legislative powers regions set the requirements for when and how SEA should be applied; they also determine when an SEA may not be needed.

The latest annual report on "SEA implementation in Italy" conducted by the Directorate on Environmental Assessment of the Italian Ministry of the Environment, Land and Sea Protection (from

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<sup>1</sup> In a smaller number of cases SEA competencies have been transferred to the provincial level of government.

now on MELSP) (2012), indicates that in 2012 out of a total of 998 local and provincial plans and programmes approved, only 195 of these plans were subjected to an SEA. This not only further legitimises the key question at the core of this study – is SEA perceived to be really useful? –but it also validates the identification of the regions as the most appropriate unit of analysis for attempting to answer this question, and reflect on the perceived effectiveness of SEA in Italy.

*Data collection and analysis*

Primary data was collected through a semi-structured questionnaire survey which aimed to develop an understanding of the regions’ perceptions about SEA’s usefulness in terms of the extent to which it is believed to be improving and influencing choices/decisions. The potential limitations or conditioning factors thought to be affecting SEA implementation in the different regional contexts are also identified. Table 1 lists the themes explored in the survey.

**Table 1.** Themes explored in the questionnaire survey

Questionnaire
1) According to Directive 2001/42/EC, the aim of SEA is to support decision makers, prior to a decision being made. Do you perceive this aim to have been effectively translated in the Italian national and regional legal frameworks?
2) It is widely portrayed in the literature that SEA is effective when it can change or improve plans and programmes so that they are more sustainable. On this basis, do you believe/perceive SEA to be useful in changing or improving planning decisions?
3) In your view, are there any issues affecting SEA practice in Italy/in your region, and/or hindering its effectiveness? If yes, what are they and how are they limiting SEA?
4) Looking at your experiences with SEA practice so far, is SEA a useful tool for decision-making? Thus, is it believed/perceived to be as effective as it actually is?
5) What kind of measures can help make the practical worth of SEA, thus its usefulness, be more believable, and in turn, make SEA actually more effective?

The questionnaire survey was emailed to the heads of the departments of the 15 Italian regions with ordinary status that hold SEA competences. As illustrated in figure 1, 11 regions returned the completed questionnaire; four regions (one from the north of Italy, two from the centre and one region from the south) did not return the questionnaire, and therefore did not take part in the study.

**Figure 1.** Regions included in the questionnaire survey



Secondary data was also used to inform this study, including published academic literature on the Italian SEA system, and national and regional level planning and SEA legislation and guidance. The 2012 annual report on SEA implementation in Italy published by the MELSP was used to test and compare findings from the questionnaire survey and from the academic and policy literatures.

The findings are presented and analysed as clusters of regional systems as illustrated in Table 2. Using the transposition deadline of the EU SEA Directive as a benchmark, three clusters of regions were identified, with each cluster indicating a different level of experience with SEA. The first group (cluster A) includes those regions who voluntarily and proactively introduced SEA-type approaches well in advance of the EU Directive 2001/42/EC and of the 2006 national level decree transposing SEA into the Italian legislative framework. These regions are:

- Emilia-Romagna: with regional law n. 20/2000, this region developed a type of ex-ante evaluation for assessing the environmental and territorial sustainability of plans known as ValSAT<sup>2</sup>;

<sup>2</sup> ValSAT, “valutazione preventiva della sostenibilita’ ambientale e territoriale”

- Piemonte, who introduced a first form of SEA in 1998 with law n. 40, requiring the ex-ante and integrated evaluation of direct and indirect environmental effects of legal, planning, programming and administrative activities;
- Toscana, which introduced several considerations prompting the requirement to carry out an assessment of the environmental effects of planning processes through law n. 5/1995. This region defined the contents of a first environmental assessment tool for strategic plans with the regional council decree n. 1541/1998.

A second group of regions (cluster B) introduced SEA in their regional framework before 2006, in dialogue with and as a reaction to European requirements, but in advance of Italy's 2006 LD. These regions are Veneto, which introduced SEA in 2004 through law n.11; and Calabria, which set out a kind of sustainability assessment through the regional law n. 19/2002. There is then a final group of regions (cluster c) which introduced SEA in compliance with and in response to Italy's national level requirements outlined in the legislative decree n.152/2006. Regions included in this group are Basilicata, Lazio, Liguria, Marche, Molise and Puglia. It is worth noting that though Basilicata is likely to fit the descriptors for cluster C, this region has yet to incorporate SEA into its regional framework (MELSP, 2012).

**Table 2:** Clusters of Italian regions

Cluster A	Cluster B	Cluster C
Emilia-Romagna Piemonte Toscana	Calabria Veneto	Basilicata Lazio Liguria Marche Molise Puglia

A thematic analysis was conducted to identify and analyse themes within the data collected (questionnaires), and to assist with the interpretation of the various aspects of this study.

### **Regional perspectives on SEA's usefulness in Italy - Questionnaire findings**

This section presents the findings of the questionnaire survey organised in terms of the three clusters of regions previously mentioned. The results indicate that generally, the regions in cluster A and partially those in cluster B appear to have developed a more advanced and effective framework, with innovative solutions proposed to limit those problems which are known to be affecting SEA implementation in Italy; and indicating a certain belief in the practical worth of SEA and in its usefulness. By contrast, regions in cluster C, who have introduced SEA in their legal framework more recently, perceive SEA to be less useful, indicating that procedural and legislative inadequacies are rendering SEA a bureaucratic and technical exercise which adds little practical worth, whether functioning or not. A more detailed review of the findings in terms of the themes listed in table 1 is subsequently presented. While the first two themes aimed to reflect on SEA's usefulness or perceived effectiveness in terms of its ability to achieve its main aim and purpose, the remaining

three themes explored the reasons or issues influencing the regions' perception about SEA's usefulness.

The first theme invited the interviewees to reflect on how the main aim of the EU SEA Directive was translated into national and regional frameworks. The findings suggest that the regions in cluster A were quite positive about the translation. They indicated that SEA's aim to support planning- and decision-making is well-articulated in their laws, as experience over the years has allowed them to embed and further consolidate this aim in regional SEA practices. For the regions in cluster B, thus of those regions who introduced SEA in compliance with the EU SEA Directive but in advance of national level legislation, the incorporation of SEA's main aim in policy and legislation was deemed sufficient; and for those in cluster C it was considered inadequate. Responses to this theme suggest that the amount of experience in conducting SEAs and the opportunity to experiment with how to conduct SEAs might be important factors to consider in determining the practical worth or usefulness of SEA. The more experienced regions, such as those in clusters A and B are likely to have greater knowledge about what is SEA, about what SEA is really for and a better understanding about the added value that it can provide, that allowed them to propose enhancements and improvements to the national legislative framework through their own regional norms. The relative "younger status" of the SEA systems of the regions in cluster C might make it more difficult to move beyond the requirements of the national framework which they perceive to be inadequate and ineffective.

The second theme asked the regions whether they believe that SEA can change or influence decision-making. The regions in all three clusters provided sceptical responses and indicated that SEA usually fails to result in changes to plans and programmes. However, while the responses from the regions in clusters A and B attribute this failure to SEA's inability or lack of power to influence politicians' decisions and actions; for the regions in cluster C this failure is due to SEA's inability to develop and promote choices within plan- and programme-making.

The interviewees were then asked to reflect on issues affecting SEA practice in Italy and in their region, and on how they might be limiting SEA's effectiveness and perceptions about its usefulness. Responses to this theme provided the greatest level of consistency within clusters and between clusters. Almost all interviewees identified the lack of "proper knowledge" about SEA as the main issue affecting SEA's capacity to support decision-makers and influence their choices, but provided different explanations. Regions in cluster A indicated that it is the lack of financial resources affecting public administrations in Italy that is hindering possible enhancements to SEA as a decision-making support tool, and better applications. Responses from clusters B and C pointed to the lack of experience in conducting SEAs, and suggested that more time, practice and experimentation are needed to consolidate SEA as a positive tool that can support and improve the sustainable directedness of planning and decision-making processes. From a procedural perspective, in line with previous responses, the regions unanimously suggested that developing alternatives appeared to be the most problematic stage. Further, they consider public participation to be too weak and argue that SEA can only marginally open up planning- and decision-making processes to a wider platform and incorporate the views of a greater selection of stakeholders. Thus, the practical worth of SEA or what is expected from SEA is perceived to be less than what is portrayed in the international SEA literature. This is potentially due to certain traits of the Italian planning and public administration system, which is highly politicised and based on established traditions which are difficult to eradicate (Fischer and Gazzola, 2006). This point was also noted by the regions in cluster A, who indicated that

SEA is failing to permeate established planning traditions and cultures, and that the rigidity of SEA procedures is making it difficult for the general public to develop an interest in, if not awareness of, SEA. Another critical issue identified by the regions in cluster A is the lack of adequate regional environmental databases supporting planners and assessors in SEA- and plan-making exercises. For the regions in clusters B and C, it is the lack of technical guidelines supporting practitioners, decision-makers and administrators that appears to be the most crucial issue. They indicated that without the existence of clear guidance on what SEA is and on what it is supposed to do, applying an SEA often means simply following a template of exercises that needs to be done in order to comply with legal requirements, but without having a clear understanding of what is being done, and why. Overall, based on the findings, the regions that have a long(er) and more established experience with SEA identified a number of critical issues that nevertheless still portray SEA as a positive tool, one that can induce change or improve plan- and decision-making. While the regions that have less experience or have experimented less with SEA identified issues that focus more on institutional aspects and on the inability of central government to steer and guide the development and implementation of SEA at the regional level.

Finally, the interviewees were asked to give their overall views on SEA's usefulness. In line with the responses provided to the other themes explored, the regions in clusters A and B indicated that they perceive SEA to be sufficiently useful, and that more needs to be done to solve the long list of issues that are still affecting this decision-making support tool. As these regions have a greater understanding of SEA's potential and usefulness in adding practical worth to plan- and decision-making processes due to their long(er)-term experiences and experimentations, having an SEA that is simply functioning, or actually working because it is complying with (minimum) legal requirements, may not be deemed enough. By contrast, cluster C provided a mix of responses. While previously these regions unanimously indicated that SEA is incapable to fulfil its main aim and purpose, they also described SEA as either being useful or very useful. This finding could potentially indicate that there are different understandings about the role and purpose of/for SEA, which could lead to the regions in cluster C having different expectations of/from SEA in terms of what it needs to do to provide practical worth.

The final theme of the questionnaire asked the regions what could be done to overcome the issues mentioned, and help make the practical worth of SEA more believable, and in turn make SEA actually more effective. The suggestions made by the regions in cluster A include the need to find new ways to improve data and to better involve the public in SEA processes. One of the regions in this cluster also proposed the creation of a regional gateway similar to the Scottish SEA gateway (see Jackson and Illsley, 2006), in which a database of SEA experiences and practices could be collected, and used by practitioners and public administrations to support future SEA practices. The regions in cluster B suggested measures that focus on the need to simplify SEA procedures, in order to better assist the tasks of public administrations and officers who often, are involved in and manage multiple SEA processes. In line with their previous responses, the regions in cluster C proposed measures for enhancing the management of SEA from an institutional perspective, such as the need for adequate guidelines, and the standardisation of all SEA regional frameworks, so that experiences can be better compared, stimulating and facilitating a greater level of learning about SEA in general, but also about what it is really for.

## **Discussion**

This section reflects on the findings presented, drawing particularly on the international SEA literature and on published reports. Overall, the findings presented in this paper are somewhat in line with the provincial perspective provided by De Montis' (2013, p.61), where "... after more than ten years from the publication of the Directive, in the Italian provinces, SEA has partially permeated the framework of spatial planning", potentially explaining why there might be only a "sufficient" level of belief in SEA's usefulness and an underlying tone of scepticism. While the findings might hold a certain degree of subjectivity, the figures about the number of plans and programmes which have undergone an SEA in 2012 against those which have been approved without an SEA published by the MELSP (2012) seem to substantiate this tone (see table 3).

<b>Table 3: Screening procedures in Italy in 2012</b>				
<b>Region</b>	<b>Plans and programmes not subjected to SEA</b>	<b>Plans and programmes not subjected to SEA with prescriptions</b>	<b>Plans programmes subjected to SEA</b>	<b>Total</b>
Abruzzo	n/a	n/a	n/a	n/a
Basilicata	18	9	2	29
Calabria	0	12	0	12
Campania	7	6	3	16
Emilia Romagna	52	206	3	261
Lazio	n/a	n/a	n/a	n/a
Liguria	0	12	1	13
Lombardia	0	196	8	204
Marche	4	101	5	110
Molise	2	0	0	2
Piemonte	2	0	1	3
Puglia	0	61	13	74
Toscana	69	19	9	97
Umbria	13	8	1	22
Veneto	28	125	2	155
<b>Total</b>	<b>195</b>	<b>755</b>	<b>48</b>	<b>998</b>

Source: Adapted from Ministry of the Environment, Land and Sea protection, 2012, p.76

Possible reasons could relate to political, procedural or institutional limitations, as indicated by the regions' responses. SEA is inherently connected with politics, particularly because of the way in which SEA engages with decision-making processes, and informs and shapes decisions. According to Cashmore *et al.* (2010, p. 373), "...impact assessment instruments are political in that they are based on a theoretical premise of engendering a change in the values underpinning policy formation and implementation". However, in a country such as Italy where the planning culture and process is strongly politicised (Fischer and Gazzola, 2006) with hidden negotiations often occurring during policy- and decision-making processes (Scattoni and Falco, 2012), a value-orienting and value-adding approach like that of an SEA is likely to be perceived as an interference into established ways of doing things, disclosing fuzzy areas of decision making and/or reducing or destabilising existing power balances and relations. Within this context, it is not surprising that almost all regions, though with different reasons, described SEA as being ineffective in changing or influencing planning decisions. Public administration offices often perceive SEA as another administrative burden which increases the timing and costs of public decision processes. One of the regions in cluster C justified their adoption and use of certain rules for avoiding SEA for specific plans and programmes, because of the administrative overload of their offices and because of financial reasons. The limitations regarding the level of knowledge and expertise available seem to offer another explanation to the perceived level of usefulness of SEA in Italy. Almost all regions in cluster B and all in cluster C pointed out the lack of adequate knowledge about how to do an SEA within public administrations, among the general public and private stakeholders. It is worth noting that data collected by the MELSP (2012) shows that SEA is almost exclusively applied to urban and spatial plans, despite the wide scope of application outlined in the EU SEA Directive. This means that urban and spatial planning policy sectors are driving the SEA agenda in Italy, determining what SEA is and what it for, shaping SEA experiences in terms of both, practice and perceptions. Limitation in knowledge is likely to hinder progress, the correct application of SEA and an appreciation of the added-value or practical worth that it can provide in a wider range of policy sectors, reducing further the space for public involvement and reflecting the common view described by the regions that public participation is tenuous and that people are not really concerned about SEA. The technicality of language adopted in expert-driven processes such as SEA often excludes citizens and other lay stakeholders due to their difficulty to understand impact statements (Diduck and Sinclair, 2002; Wiklund, 2005), affecting the level of perceived effectiveness or usefulness of SEA.

A recent proposal to reform the planning system put forward by the Italian Minister of Infrastructure and Transport Maurizio Lupi, could provide the opportunity to address some of these issues, as well as provide an arena for discussing the purpose of SEA, the expectations of/from SEA, the type of competence required to achieve these aims and expectations, and engage the public. Based on the questionnaire findings, it could well be that perhaps because of different levels of experience and experimentation with SEA, and because of the cultural and traditional aspects of the Italian planning system, different regions have different expectations from SEA, and have different levels of belief in what constitutes SEA's practical worth, particularly if compared to what is portrayed in the international SEA literature. Could it be that for those regions who have not yet matured significant experiences with SEA and have not yet been able to consolidate it as a positive decision-making support tool, SEA's practical worth should be rethought and its expectations redefined? Would more realistic expectations from/for SEA help make its perceived effectiveness or usefulness more believable and in turn enhance its actual effectiveness?

## Conclusions

This paper aimed to reflect on SEA's usefulness as perceived by the heads of the SEA departments of 15 regional governments in Italy. It aimed to look at the extent to which existing limitations might be affecting SEA's ability to support decision-making and change plans and programmes for sustainable development. In line with published research on SEA effectiveness in Italy, the findings indicate that the perception of SEA's usefulness among regional public administrations is considered either sufficient or relatively low.

Despite the SEA Directive having been introduced for over a decade or SEA-type assessments for longer in selected regions, the level of fragmentation of SEA regional frameworks is high, with legislation, practices, distribution of competencies and approving responsibilities, professional expertise and levels of experience varying across the country. The patchy timescale with which the directive has been transposed into the Italian framework might be partly to blame, as rather than unifying SEA systems it might have further disjointed them, creating a significant gap in perceptions about SEA's usefulness between the regions in cluster A and those in cluster C. For some regions, this situation might have been beneficial; the regions in cluster A have accumulated more experience with SEA, learned and experimented through practice and overall seem more advanced than those regions who have "younger" regional SEA systems. This is likely to make these regions more susceptible to appreciating SEA's usefulness and to find practical worth in its application beyond the minimum requirements set by central government. Other regions might need more time for SEA to permeate the planning system, overcome existing limitations and recognise SEA as instrumental for enhancing the consideration of environmental aspects and values in policy- and decision-making for sustainable development in a way that is believable, realistic and worthwhile pursuing. For this shift in belief to occur, the SEA systems of these contexts might need time and a more realistic set of expectations from/for SEA to fulfil that suits the maturity of their SEA system.

The findings also demonstrate how the Italian regions are holders of special knowledge about the state of the art of SEA within their respective administrative contexts, and can suggest innovative solutions for overcoming some of the limitations portrayed in this paper. Based on the Scottish experience (Jackson and Illsey, 2006), the proposal of a gateway in particular could help reduce the administrative burden of undertaking an SEA, enhance communications and sharing of experiences among public authorities, practitioners, consultees within each region and between different regions, making SEA more accessible and possibly instrumental in promoting learning about its usefulness. A standardisation of regional SEA settings could also help simplify and unify the Italian SEA system, by reducing the high level of fragmentation of SEA frameworks and contribute to enhancing perceptions about SEA's usefulness.

Ideally, discussions around a planning reform should open up opportunities for many of the issues presented in this paper to be debated, and for established regional and national planning traditions and political cultures to be permeated. Further, it should provide a forum for innovative solutions to be explored, and for the role and purpose of SEA within the Italian planning system to be reflected upon. But, if there is little belief in SEA's usefulness and practical worth, how can it feature on the agenda of (future) planning reforms?

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