Mainstreaming the environment through appraisal: integrative governance or logics of disintegration?

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Abstract

In both national and international circles, environmental policy makers are repeatedly faced with the challenges posed by scientific, institutional and administrative fragmentation and complexity. Within this context, appraisal – of policies, programmes and projects - has been repeatedly advocated as a key integration tool that can help policy makers navigate such fragmentation and complexity by better integrating environmental concerns into decision making. In this paper we examine the challenges that are posed for Integrative Governance (IG), defined as the theories and practices that focus on the relationships between policy instruments and/or governance systems (Visseren-Hamakers 2015), from the perspective of efforts to integrate environmental considerations into all sectors of decision making via appraisal. Drawing on institutional theory, we explore the cross-sectoral and multi-level institutional challenges surrounding the integration of environmental considerations across different levels of appraisal. We do so by

examining appraisal in the European Commission, and at the national, regional and local level in the UK. We argue that conflicts between different 'logics of integration' – or disintegration – routinely hamper the integration of environmental concerns between governance levels and across governance sectors. These logics include differences between appraisal systems; between appraising in theory and in practice; between different sectors; and between the fragmented professional logics of different policy actors.

Introduction

Environmental governance is widely accepted as being complex, fragmented, and difficult to handle, with multiple dimensions and an enormous range of potential problems, policies and instruments. Almost as widely accepted is a desire to reduce some of this complexity through more 'integration', alongside a plethora of theories, frameworks, analytical tools and concepts for facilitating integration. Indeed – and ironically, as Visseren-Hamakers (2015) points out in a comprehensive review – these concepts themselves have become complex, fragmented and difficult to handle, covering ideas such as environmental policy integration, mainstreaming, landscape governance and groups of regimes. Visseren-Hamakers proposes the umbrella concept of Integrative Governance (IG) as a way to make sense of the similarities and differences between these ideas and their units of analysis, to work towards a new, mutually-informed, research agenda, to strengthen links between academic and practitioner perspectives, draw common lessons, and enhance

integrated decision making (Visseren-Hamakers 2015; Visseren-Hamakers 2018a). What may be termed an 'IG perspective' focuses in particular on better understanding of the relationships between (environmental) governance *instruments* and/or governance systems, where instruments are simply defined as rules for governing.

In this spirit, this paper focuses on the impact on decision making of one particular instrument – appraisal. Appraisal has long been considered by academics and policy makers as an important approach to more integrated environmental governance across different policy sectors (Jordan and Lenschow 2008; TEEB 2010; Visseren-Hamakers 2015; Russel and Jordan 2009; Runhaar 2016). Formalised and systematic appraisal of projects, programmes and policies has been regarded as an important tool in strategies of governments worldwide since at least the 1960s; see for example the US Programme Planning and Budgeting System (Schultze 1970) and the UK Central Policy Review Staff. A classic definition of appraisal is "[that] family of ex ante techniques and procedures.... that seek to inform decision makers by predicting and evaluating the consequences of various activities according to certain conventions" (Owens et al., 2004, p.1944). But appraisal takes many different forms, and may be done according to many different criteria, such as administrative costs, regulatory burden, or impacts (financial or other costs), and can be practiced by any number of different policy sectors or by various actors (Turnpenny et al 2009). Environmental considerations in particular have featured strongly in appraisal's history, especially since the US National Environmental Policy Act (US Government

1969) established Environmental Impact Assessment for "every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment" (US Government 1969: Sec 102(C)). Through the application of *ex ante* appraisal, there have been repeated attempts to better integrate environmental perspectives into sectoral policy making as part of a wider process of environmental policy integration, at policy level (Hertin et al 2008), programme level through Strategic Environmental Assessment (SEA - see e.g. Bina 2007), and project level through Environmental Impact Assessment (EIA - see e.g. Jay et al 2007). These programme and project level appraisals are often underpinned – in the EU, for example – by legal requirements (Directives 2001/42/EC and 85/337/EEC) and backed up by extensive technical guidance (e.g. COM 2015a). Appraisal is seen by policy makers (e.g. TEEB, 2010) and academics (see for example Hertin et al 2008) as particularly relevant to advancing more integrative governance since it requires policy actors to engage with potential 'spillovers' of one policy into other policy sectors, and how such policies address cross-cutting goals such as environmental protection (Jordan and Schout 2006; Russel and Jordan 2008). In essence, therefore, policy appraisal should produce the information needed to facilitate integration in terms of identifying the sectors in which spillover effects occur. This can then be used informally or formally (through for example inter-ministerial committees) to minimize these impacts or even prioritise cross-cutting goals within policy decisions.

This paper examines the challenges faced by appraisal as a tool for better integrating environmental considerations into decision making in a multi-level decision making context. We examine the supra national (EU), national (UK) and sub national (UK regions and localities) levels as illustrative examples of how institutional barriers can operate to limit the uptake of environmental knowledge into appraisal. We focus on the EU and the UK as they have been at the vanguard of political systems using appraisals for more integrative governance around environmental goals (Lenschow and Jordan 2008). The research was conducted during 2013 to 2014, a time when appraisal of environmental impacts of prospective policy was being strongly pushed by the UK Government. Analysis of the quality of appraisals during this period suggests that practice did not meet the UK government's aspirations (Russel et al 2014; Turnpenny et al 2014) (this analysis is summarised along with other key literature in the next section). Thus the studied time period provides an excellent opportunity to gain insights into the difficulties that IG can face, even in an environment of seemingly strong political support.

The next section provides an overview of if the IG perspective from in the context of appraisal. Following this, the paper focuses more specifically on the literature on policy appraisal and how it as performed in different governance contexts. Then the paper draws on insights from institutional theory to show how conflicting 'integration logics' can act as barriers to both horizontal and vertical integration of decision making in the context of appraisal. Finally, the paper concludes and draws out the lessons from the paper for IG and outlines agendas for future research and practice.

Integrative governance and policy appraisal

While our focus on policy appraisal links to a very specific subset of IG concepts, it contributes to IG as an emerging concept in several ways. First, a main aim of the IG framework is: "explanatory analyses of the relationships and performance of groups of governance instruments" (Visseren-Hamakers 2018a). Jordan and Lenschow (2010) argue that one can observe how more integrated decision making works in practice in three different ways: 1) how the process of integration occurs, including how different administrative instruments operate and interact to facilitate coordination processes, 2) the outputs of policy integration in terms of policy produced, i.e. the extent to which the environment has been incorporated into the policy and 3) outcomes in relation to whether there are improvements in physical environment as a result of policy integration. Through examining how a specific set of related instruments' operate in practice, we examine the challenges faced by appraisal as a long established tool to promote more integrated policy making (Jordan and Lenschow, 2008), and the subsequent challenges faced by IG. Appraisal is a particularly helpful focus because much of the existing IG-related literature often concentrates on current policies: "While scholarly debates focus on analyzing the fragmentation of current governance systems and trying to improve relationships between existing policies, the consequences of this fragmentation for the development of new policies receive relatively little attention" (Visseren-Hamakers 2015, p. 141). A focus on an instrument explicitly intended to operate with policies under development is helpful, especially since policy is rarely developed 'from scratch'. Appraisal acts as a bridge between existing ideas and potential new ones,

encouraging some and rejecting others, and examining its operation might be particularly fruitful in better understanding integration between policies old and new.

Second, the paper departs from existing studies by examining different institutional 'logics' that operate between governance sectors, governance scales, appraisal systems and policy making professionals, how these can hamper the integration of environmental knowledge into decision making (and ultimately policy outcomes) via appraisal, and hence the instrument's ability to facilitate more IG. The concept of logics, which draws on new institutionalist ideas examining rules in use and informal rules as well as official rules on paper (Visseren-Hamakers 2018a), helps provide explanations for some of the challenges faced by those promoting appraisal as a tool of IG.

Third, an important part of the IG research agenda is to examine relationships between different types of instruments from different governance systems and levels, and different policy sectors (Visseren-Hamakers 2018a). While such analysis could quickly become intractable, focusing on the broad single instrument of appraisal allows consideration of several variants on that instrument, while maintaining a focused empirical remit. The paper examines appraisal in the EU, which has been a pioneer in its approaches to environmental policy integration, specifically through policy appraisal, in all levels of decision making (Jordan and Lenschow 2008). Some type of appraisal is employed at every level of governance from the European Commission and member states through to SEA and EIA in local

planning policy and development projects. The paper also specifically examines appraisal in the UK, which has been at the vanguard of attempts to better integrate the environment in decision making (Russel and Jordan 2008), and has been a leader in developing policy appraisal processes (de Francesco 2016). The paper's overarching examination of appraisal as an administrative process thus reveals empirically some of the dynamics and extent of both horizontal (between sectors) and vertical (between governance levels) integration.

Fourth, there is a still-unresolved paradox about appraisal. Despite its reputation, studies have shown that in practice appraisal across all governance levels has not consistently operated in a way that promotes integration, either of environmental knowledge into appraisal, or of appraisal into policy, or of policies or sectors themselves (see for example: Turnpenny et al 2009; Eales and Sheate, 2011; Morgan 2012). We argue that this disparity between the positive reputation of the EU and UK and the more negative critiques of practice make an ideal case study for exploring the challenges faced by appraisal as an important tool for IG.

Finally, much of the IG-related literature is about 'improving policy coordination' and proximate causes of the lack of it: "IG literature remains rather 'managerial' in character, with authors expecting or hoping that enhanced coordination and learning will improve environmental governance performance" (Visseren-Hamakers 2015, p. 141). An important part of the IG research agenda is to look beyond such approaches into more political explanations for integration or lack thereof. By

drawing explicitly on institutionalist ideas, and focusing on the operation of a politicised instrument in practice, this paper contributes to this call.

Policy appraisal research

Due to its important role in policy integration, appraisal has become a major area of research in both the public administration (e.g. Dunlop and Radaelli 2016; Dunlop et al 2012; Turnpenny et al 2009) and the environmental social science literatures (e.g. Owens et al 2004; Russel and Jordan 2009; Bina 2007; Bond 2015). What these literatures have in common is that they explore the use of appraisal as a tool for integrating knowledge into decision making processes, i.e. how far appraisal is typically characterized as a rationalist process, whereby the appraisal generates knowledge about one or many integration priorities which is then used to make adjustments to policy to minimize negative or maximise positive outcomes. The public administration literature has focused more on how appraisal has been used to influence regulatory processes, through factors such as political control, attempts to rationalize the policy processes, and minimizing regulatory effects (e.g. see Radaelli 2005, Dunlop et al 2012). The environmental social science literature has been more concerned with appraisal as a tool for integrating specifically *environmental* considerations across different policy sectors at different levels of government from the local through to the supra-national sectors (Russel and Jordan, 2009, Hertin et al 2008; Turnpenny et al 2014). In this literature, appraisal is explored in the wider context of policy integration strategies with a focus on both how far appraisal leads

to more integrated decision making processes across policy sectors, and on the interaction of appraisal with other policy integration venues such as inter-ministerial and cabinet committees. The rationale is that ex-ante appraisal at the earliest stages of the decision making processes can alert policy makers to potential policy spillovers into cognate sectors and governance systems thus providing the necessary knowledge to facilitate the integration processes. According to Schout and Jordan (2005: 215), policy appraisal is the "lubricant" of policy integration without which there is little or no information for other parts of the policy integration machinery to use in their coordination efforts.

The body of literature on policy appraisal largely shows that while there are clear cases of technical-rational instrumental uses of policy appraisal to drive the integration of relevant knowledge into policy making (see Dunlop et al 2012), many appraisals are used rather symbolically - for example to justify pre-determined policy choices, and/or demonstrate that policy goals have been consulted on – rather than necessarily drive policy development in a more integrative direction (Nilsson et al 2008; Dunlop et al 2012; Runhaar 2016). Indeed, policy-level appraisal practice has often had a distinctly mixed impact in facilitating IG, exhibiting well-documented problems with handling environmental impacts (see Adelle et al 2012 for a review). Similar concerns have also been expressed with programme-level (SEA) (Pope *et al.,* 2004; Jenkins *et al.*, 2003; Lee and Kirkpatrick, 2000) and project level (EIA) appraisal (for example, Wood and Jones, 1997; Cashmore *et al.*, 2004; Elling, 2009; Rozema *et al.* 2012). However, environmental assessments such as EIA and SEA do show a more complex and mixed picture of integrating environment in decision making (e.g.

Arts et al 2012; Runhaar 2016) than does policy-level appraisal. The importance of politics as a factor affecting the integration process is also clear at these levels (Runhaar et al 2010; Cashmore et al 2009; Cashmore & Richardson 2013).

The wider research programme from which this paper was written sampled 75 policy-level appraisals, 50 SEA documents and 50 EIA documents and found that while appraisal is widely practiced in government from the EU level right down to the lowest level of decision making practice, practice often fell short of high-level appraisal ambitions. Specifically, appraisals were found be inconsistently used to integrate environmental knowledge into decision making and to ultimately having little impact on final policy decisions (Authors, XXXX). These findings are consistent with the patterns in the aforementioned appraisal literature, which has examined appraisal practice since the early 1990s (e.g. see Russel and Jordan 2007) showing a long established pattern. A key question is why has appraisal often fallen short of expectations as a tool for more integrated decision making?

Appraisal, institutions and logics of integration

To understand the role played by policy appraisal in IG, this paper draws on insights from institutionalism (Peters 2005). For this purpose, we define an institution as an established or ad-hoc configuration of formal and informal 'systems of rules, norms and cultural systems of meaning that shape the courses of action' (see for instance Scharpf 1997: 38). In a broader sense institutions are social constructs. They are also dynamic social entities that over time attain a relatively high degree of resilience (Scott 2001: 51), and which coordinate behaviour across policy through harmonized

perceptions and scripts for action (Aspinwall and Schneider 2000; DiMaggio 1997) - thus they can have strong integrative characteristics and normative cores. Within this definition, we can include appraisal systems and processes as institutions as well as the different sector and governance environments in which they operate.

Crucial to the institutional literature is the idea that different institutional 'logics' create the rules around which behaviour and decision making occur. These logics, among other things, help facilitate simultaneous activities, avoid excessive conflict and reduce unpredictability (March and Olsen 1989: 24), and thus reduce "the time and energy otherwise used on thousands of decisions about how to perceive and evaluate an otherwise unintelligible stream of information" (March and Olsen 1994: 253). While over time the rules and routines associated with the logics of different institutions can change (such as following an acute crisis), they tend to have a "surprising durability" (March and Olsen 1994: 262), which can give the impression of inertia (Smith et al. 2000).

In the literature, important distinctions exist in terms of the underlying rationale of the different logics (Hall and Taylor 1996), which can range from a more rationally inspired 'logic of consequence' that seeks to reduce the transaction costs of actions (Peters 2005), to a more sociologically inspired 'logic of appropriateness' that evolves as social processes, images, symbols and rituals combine to form rules of behaviour which lead to the development of shared meanings (Morgan 1997: 132). While these logics can in some cases help with the internal coordination of action within institutions, they can in other cases be detrimental to more integrative

working between institutions if there is a mismatch between logics. These might be termed 'logics of disintegration'. Drawing on our empirical work below, and the existing literature, we suggest there are at least four institutional logics of integration which may have hindered IG through all levels of appraisal.

The first logic (I) applies to the policy appraisal instruments themselves, which can have markedly different foci, institutional arrangements and procedural rules depending on the *level of governance* in which they are operating (Russel et al 2014). We contend that different logics of integration are at play within appraisals operating at different governance levels, which can limit their capacity to integrate environmental considerations into decision making. The second logic (II) concerns governance differences *between sectors* with regard to both how appraisal works and how environmental considerations are integrated therein. This logic is based on the premise that different sectors – or governance systems - have their own priorities (which may be different or even antithetical to environmental goals), their own procedures for conducting appraisals, and their own definitions of the problem at hand (e.g. see Peters 2015; Jordan and Lenschow 2008). We contend that these differing sectoral logics can impede the horizontal integration of environmental considerations into the decisions made across policy sectors via policy appraisal. The third logic (III) concerns a disconnect between the institutional logic of appraisal, often framed as a rational technocratic process, and that of *decision making processes in practice*, which tend to operate on a much less linear logic (see Owens et al 2004). We contend that conducting an appraisal according to technical rational guidelines is a complex procedure given the actual setting in which policy is made,

and may hamper IG. The fourth logic (IV) relates to *differing professional logics*. It concerns how the logic of policy appraisal and its application to environmental decision making can mean different things to different people from different professions and governance settings. Drawing on Radaelli (2005) and Runhaar et al (2013) we can suppose that the logic of an appraisal may vary depending on a person's professional relationship to the policy process. For example, for an economist the main logic of an appraisal may be the efficiency of natural resource use. For a civil servant it may be conforming to formal and informal policy making rules, which may or may not prioritize integration of environment. For a politician it may be navigating conflicting pressures from conservationists and other important lobby groups, the 'median voter' and international commitments. For a business actor it may be profit maximization, and the extent to which the preservation or destruction of environments affects the bottom line. For a member of the public, it may be more about ensuring decision making protects them against environmental risk. We contend that where these different professional logics are not aligned they can shape the way actors interact with appraisal, and thus impede how it integrates environmental considerations into decision making.

Methods

The paper draws on a review of the literature on policy appraisal in the UK and European Union context, along with data obtained through 27 interviews with decision makers and appraisal experts working at different governance levels to explore how these logics might manifest. These interviews were conducted in 2013-14. This was an analytically useful period to examine the performance of appraisal,

as it was at a time when there was a strong push on environmental appraisal in the UK following the publication of the 2011 Environment White paper, which prioritised appraisal as a key delivery mechanism for pursing environmental goals. This gave us an excellent opportunity to explore how institutional logics operated within a 'live' policy episode. We used a sampling method whereby interviewees were selected because of their relationship to and knowledge of the appraisal process and environmental policy goals. Building on Howlett (2011), interviewees were further sampled to ensure a mix of perspectives from different institutional positions: 'Core Actors' to the appraisal process (interviewees labelled 'A' below); 'Public Sector Insiders' (B); 'Non-governmental Insiders' (e.g. consultants conducting appraisals) (C); and 'Outsiders' with an interest in appraisal (e.g. professional bodies) (D). In total 54 potential interviewees were approached using the author's existing contacts and the snowballing method. The interviews were framed by a number of headline questions around appraisal, and how it was used or not to support the integration of environmental knowledge into decision making. A semi-structured format was used to allow for both comparability and flexibility. These questions were broad enough to test points raised in the academic literature, while simultaneously avoiding steering or leading the interviewees. The interviews were conducted either face-to-face or via telephone. Interview summary transcripts were produced shortly after each interview to enable thematic data analysis.

Logics of (dis)integration

Logic I) Contrasting integration logics at different governance levels

A clear illustration of the contrasting integration logics at different governance levels can be seen by comparing appraisal in the European Commission and in the UK government. Both of these systems have an integrated approach, which seeks to appraise for many impacts in one process. Thus the scope for analysis is wide, which can create ambiguities when considering conflicts and trade-offs (e.g. long-term protection of natural environment versus short-term financial concerns). However, European-level decision making has a more strategic and flexible orientation, setting framework targets for member states (e.g. the Water Framework Directive) but not stipulating how these targets should be delivered. In this context, appraisal is arguably more likely to focus on the physical environment and broader macro-economic impacts of the directive. By contrast, member states often have to produce more precise policies to implement both EU and domestic initiatives. In such cases an appraisal has to consider a different range of policy options to implement, meaning that the appraisal not only has to incorporate analysis of how different policy options deliver broader framework objectives (e.g. cleaner air or increased internet broad band coverage) but also the wider impacts of these delivery mechanisms on different societal groups, sectors in the economy and cognate sectors. Thus, there are different decision making logics at these different levels of government, requiring very different appraisal analysis. This means that the impact of appraisal on policy making for example at the national level could well be limited as the broader policy direction of the policy has already been set at the EU level under more macro-level appraisal dynamics[1]. If appraisal analysis at the national

[1] Interviewees A5, D7

level reveals environmental impacts not seen at the EU level, the actual impact of this analysis on UK decision making this is limited as the EU policy direction is already set and the UK is required to implement it (see Russel and Jordan 2007, p.14).

In a similar vein, programme and project level appraisal (SEA and EIA) in the sub-regions of EU Member States tend to come later in the decision making process:

> *"with something like SEA, it is designed to come out late in the process, making integration of assessments difficult... in practice"* [interview A2].

This can create problems because national policy frameworks are not necessarily sensitive to local contexts. Even if an SEA or EIA uncovered important local impacts, the scope for fundamental changes in the policy direction are limited as the wider policy direction has already been set.

Unlike policy level appraisal in the EU and UK, which is governed by administrative protocol, SEA and EIA must meet specific legal requirements as enshrined in EU Directives (2001/42/EC and 85/337/EEC). Thus, there is less flexibility in terms of methods and processes used to produce the appraisal, and what impacts can and cannot be covered:

> "*So going above and beyond [legally stipulated process] can be considered [a] risk. There is a fear of EU law compliance; if you are not well versed you can get caught out, and this gets publicised.*" [A5]

This can then act as a barrier to the appraisals' influence on decision making. For example, EU and UK level policy appraisal tend to be focused on more quantitative approaches to gathering data on impacts, including the monetization of non-market goods and advanced modelling. SEA and EIA tend to follow a more mixed method approach, including quantitative environmental indicators alongside more qualitative and stakeholder orientated approaches. Extending more quantitative (especially monetized) approaches to SEA and EIA is problematic because of the legal nature of EIA and SEA, which could open up such analysis to legal dispute. As one interviewee remarked:

> *"In SEA you are not allowed to value the environment" [A2]*

This thus creates disincentives to follow similar approaches to policy level appraisal, as exemplified by the words of one interviewee:

> *"I would not want to get into discussions on prices in court. Lawyers could kill this."* [A5]

Again these different appraisal logics between national policy making and local appraisal processes can impede the influence of appraisal on decision making. Indeed, national policy frameworks framed by a logic of quantifying the environment do not necessarily conform with both localized appraisal and implementation requirements. This can create a disconnect that renders the appraisal processes

effectively redundant in terms of fundamentally influencing the decision making direction.

Logic II) Conflicting sectoral policy making logics

Conflicting sectoral policy making logics were particularly observed in UK-level policy making, although similar issues have been observed in relation to IG and policy appraisal in the EU (see Jordan et al 2008). These differing sectoral logics reinforce the fragmented nature of policy making at the expense of IG. As an interviewee remarked:

> *"Different departments interpret the importance [of integrating the environment into their decision making] in different ways. The [policy appraisal] guidance does look at the level playing field, but there is a different prioritisation of effort in different departments."* [A1]

In such a context the appraisal of environmental impacts can become a political exercise where there can be resistance to incorporating another sector's agenda into decision making via appraisal:

> "*It's not got the other government departments interested. They still see it as… the environment sector's agenda…"* [B4]

Thus, in some instances

"appraisal is seen by some as legitimization and unnecessary, as long as they attach an environmental label to the policy." [B1]

Much of this institutional fragmentation stems from a failure to understand the added value of considering the environment in sectoral decision making. This can be dominated by particular objectives, time and resource constraints, layered on top of different approaches to integrating knowledge into the decision making process beyond appraisal.

This problem is perhaps exacerbated by the fact that all UK policy-level Impact Assessments must pass through the UK Government's Regulatory Policy Committee, which has a focus on reducing the regulatory burden of policy on business, and can block a policy proposal if this is seen to be disproportionate to the benefits. This, according to some interviewees[2], can create the incentive for efforts to be placed on assessing economic costs and benefits at the expense of the assessment of environmental impacts in appraisals. Similar processes exist in the EU, where the Commission-led Regulatory Fitness and Performance agenda is seeking "to reduce regulatory and administrative burden without endangering the achievement of the objectives of the legislation" (COM 2015b: 3).

Sectoral logics and resulting institutional fragmentation of decision making is not just an issue that impacts upon policy-level appraisal but is also seen with EIA and SEA.

[2] A5, A11, A12

For example, the configuration of the UK planning system is geared towards development[3], despite the fact that EIA and SEA have an environmental focus. In such a policy making context, development goals can get prioritised over environmental ones meaning that the impact of SEA and EIA on planning processes can be marginalized and often conducted as an add-on to the decision making processes[4]. Moreover, planning policy in the UK, which is the responsibility of the Department for Communities and Local Government and delivered by local authorities, is a separate policy domain to, for example, agriculture and forestry, which is the responsibility of the Department for Environment, Food and Rural Affairs. So the planning system does not address agriculture and forestry. According to an interviewee, this means that:

> *"… local authorities don't have a say on agriculture or forestry and they are thus talked about in isolation...so local authorities have no need to engage in agricultural policy [in their SEAs and EIAs]."* [C1]

Conflicting sectoral policy making logics at the programme and project levels thus fragment decision making and make it much harder to integrate environmental considerations via appraisal.

Logic III) Appraisal logics of rationality versus the messy reality of policy making

Differences between the logics of policy making and the logics of appraisal were

[3] A5, B1. B2, B3, D3
[4] A5, B1. B2, B3, D3

observed in our research. According to one interviewee, rather than a technical rational logic of embedded analysis, appraisals tend to be conducted around existing policy making logics and processes:

> *"If someone has done the appraisal and someone says 'did you think about x, will you go back and do it again?' the answer likely be 'no' as you may miss your parliamentary slot" [A2]*

As a consequence, an appraisal can simply be a tidying up exercise that occurs late in the decision making process[5], which acts as a "snapshot" [D4] of the process rather than a "dynamic" [D4] aid to the integration of environmental knowledge into decision making via appraisal.

The political aspects of appraisal were noted by many interviewees. One interviewee observed:

> *"What is the incentive for the Secretary of State to pay attention to the [policy appraisal]? He is under immense pressure from the Cabinet to not let environmental regulation get in the way of infrastructure development and housing" [B4]*

In such situations a full policy appraisal could to some be seen as an unnecessary

[5] A11, B4, A12, A6

burden[6] as the policy direction has already been set. These types of political pressures are clear at a policy level[7] but were also seen by some[8] to be an issue with SEAs and EIAs. In certain cases, such as where the changes proposed are administrative rather than substantive, a formal and comprehensive appraisal procedure was also seen as rather unnecessary,[9] as exemplified by one interviewee who remarked that when someone must conduct an:

> *"SEA regardless, [it] ... might not actually achieve the objective, [so you] just end up with lots of forms and reports" [A14]*

The embedding of appraisal within wider policy venues is also important. Returning to the example of the planning system, often the expertise used to produce the SEA or EIA can be far removed from the planners who make the final planning decisions; as one interviewee remarked:

> *"a lot of these assessments are carried out by consultancies and if you are in a consultancy you are peripheral to the decision making process." [C1]*

This is less of an issue in policy level appraisal in the UK government and the EU, and in some SEAs, where the policy maker conducts the analysis, thus acting as a 'venue'

[6] A6, A8, A12, A11, D3
[7] A1, A2, A5, A8, B1, B3, C2, D2, D3,
[8] A1, A3, C1, D2
[9] A1, A3, A4, A8, A11, A12, A14, A15, B3, B4, B5, C1, C2, D3

for integration between the appraisal and the decision making processes. However, this does raise questions over whether a policy maker has the requisite skills:

> *"We need to facilitate a better understanding of the benefits of early framing and of identifying environmental impacts early enough. We still have a mixed record on this. Appraisal is dependent on… board knowledge and understanding... of whole process and the benefits." [A1]*

The net result of the competing policy and policy appraisal logics is that:

> "*There are no instances of big issues being thrown up* [*through appraisal]"* meaning that *"appraisal is not necessarily the main point where the most important decisions are made" [B3].*

Thus policy makers can end up questioning the value of the appraisal processes[10]:

> *"I struggle to think of someone who saw appraisal as a useful exercise – they just get a consultant and knock it off" [*B3]

Logic IV) Different professional logics of appraisal and environment

While we were unable to systematically map all different professional logics around appraisal due to the sample size and the diversity of professional backgrounds of interviewees, we did find (in conjunction with Radaelli 2005 and Runhaar et al 2013)

[10] A5, A6, A7, A14, B2, B3, C2, D6

that conflicting professional appraisal logics can create fragmentation of the necessary skills needed for a comprehensive analysis[11]. As one respondent put it:

> *"Projects are being led by specialists. If you want a cross cutting team you have to identify and pay for the time of experts. This creates inbuilt silos" [D2]*

Similar concerns were provided by interviewees working at the policy level:

> *"most appraisals which have a scientific component involve scientists, engineers – but these people are much less embedded than economists." [A13]*

The problem may be exacerbated where the non-expert general policy maker who has to conduct the appraisal (mainly at policy level appraisal, and in some instances SEA) has to explore these silos to find relevant information.

Concern was expressed by some interviewees[12] about the dominance of economics in the appraisal process and the related push for enhanced monetary valuation of environmental impacts at all levels of appraisal, because of the idea that values are not objective but "cultural constructs" [A10]. Thus while monetary valuations may provide a veneer of scientific fact there are well documented ethical dilemmas surrounding the quantification of environmental impacts and assessing their costs

[11] A4, A12, C2, C3, D2
[12] B2, C3, C4, D2,

and benefits (e.g. Pearce 1998, Russel and Jordan 2007). Hence, a perceived logic of quantification of the natural environment can mean that appraisal is met with resistance by sceptical decision makers as a matter of professional principle, or overlooked because of the limits of professional competence.[13]

The problem of differing professional interpretations is perhaps enhanced by the different logics of the academic professionals who focus on defining and measuring impacts of decisions on the environment, often from different disciplinary perspectives, and policy making professionals who have to apply environmental knowledge to real-world decision making contexts. As a result, as one interviewee remarked, "Those that are not fully involved find it very jargonistic" [B4]. In the words of another interviewee: "There are different terminologies from rival academic camps" [C1]. For some, the underpinning logic is about following a more analytical approach to environmental decision making, for others it is about promoting agendas and persuading different actors. Thus appraisal as an integration tool is shaped by these different disciplinary logics, which can impact upon the influence it has to better integrate the environment in decision making processes, again contributing to a logic of disintegration.

Conclusions and Discussion

[13] A5 A11, A12, A13, A15, B1, B4 C2, D2

This paper has sought to contribute to the IG debate through the empirical example of integrating environmental considerations into all policy decisions via policy appraisal. More specifically, the paper addresses some of the gaps in the IG literature (see Visseren-Hamakers 2015; 2018a; 2018b) in terms of understanding the relationships between different societal sectors (or governance systems), including multiple levels of governance in the EU. In so doing it has drawn on ideas from institutional analysis by providing an explanatory analysis of integration approaches which can be applied beyond appraisal. We have also added to the IG literature by examining how, and the extent to which, different levels of appraisal can better integrate environmental considerations into decision making, both vertically (i.e. between different decision making tiers) and horizontally (between sectors). Consequently, we have also addressed another aim of this journal issue (Visseren-Hamakers 2017a): defragmenting the IG debate by exploring the performance of policy appraisal from the perspective of policy integration, mainstreaming and policy coordination.

While not making claims to the generalisability of the specific logics at play, we have shown that integration problems persist. While these problems might be specific to the different types of appraisal and governance, their underlying drivers can be attributed institutional dynamics. Indeed, other research has shown the important role that institutions can play in relation to the operation of policy appraisal (e.g. Turnpenny et al 2009) and policy integration processes (Jordan and Lenschow 2008) in different political jurisdictions. This paper builds upon these explanations by using

institutional logics to explore deeper explanations of the factors that may impede IG. So while we may observe very different barriers to policy integration on the surface (for example, policy level appraisal being weakened by political steering, or programme and project appraisal being affected by the appraisers' distance from the decision making process), we can identify a common underlying barrier relating to the mismatch between the logic of the appraisal process itself and different logics at play in institutions in which appraisal must operate. Our findings are of course based on one instrument for IG in the specific policy contexts of the EU and UK. Further research could explore whether similar barriers exist in other political contexts and with other approaches to IG. Research could also explore the extent to which these institutional factors intertwine with non-institutional factors in explaining IG (see e.g. Visseren-Hamakers 2017b).

While our research did not set out to find alternatives to, or lessons for, improving appraisal, we argue that understanding the different logics at play can help with improving appraisal as a tool for IG. So rather than a technical rational assumption of how policy appraisal should work, more effort should be put into understanding what institutional logics are at play in different cases. At the very least, this understanding of institutional logics can be used to help manage expectations about what appraisal and similar IG tools can or cannot achieve in practice. However, it should also be possible to design strategies to better support appraisal processes, given a better understanding of the institutional environment in which they must operate.

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