

**The Limits of Integration through Planning**

**Experience with Regional Environmental Policy Planning in the Netherlands**

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## Abstract

Policy planning is not a new phenomenon in Dutch environmental policy. Various environmental laws contained planning obligations for both the national government and the provinces in fields like solid waste, water quality, soil conservation, etc., since the seventies. A new system of plans was introduced in the chapter on plans of the Environmental Management Act which integrates all sector plans in a single strategic environmental policy plan in relation to a single operational implementation plan.

This article is based on an evaluation study as part of the formal law evaluation of this chapter. The main evaluation question was if the planning chapter reached its targets. In particular, did the new planning system contribute to the integration of the different sectoral environmental policies? And what role can integral environmental plans play in integrating sectoral environmental policies?

## 1. INTRODUCTION

In the Netherlands there are several planning systems related to the physical environment. The main systems are a land-use planning system, a water management planning system and an environmental planning system. These three planning systems have a legal basis in different acts, namely the Town and

Country Planning Act, the Water Management Act and the Environmental Management Act, respectively. This article is based on an evaluation research (Coenen et al., 1998) in relation to the periodic assessment of the planning part of the Environmental Management Act, which is required by law. Article 21.2 of this act stipulates that the Minister of Housing, Spatial Planning and Environment is to report regularly to parliament on the manner in which the act is being applied. In this, the minister takes advice from the Environmental Management Act Assessment Committee. With respect to the fourth part of the Environmental Management Act concerned with planning, this committee has commissioned an evaluation research project<sup>1</sup>, into the implementation of the planning part at provincial level. In the Netherlands, in addition to the national government and the more than 600 municipalities, there are twelve provincial governments. These provincial governments play an important role in such matters as environmental and spatial policy.

Experience with Dutch provincial environmental policy planning is of particular interest to other countries for two reasons. In the first place, the Netherlands are considered to be the most important pioneer in the area of integrated environmental policy planning (OECD, 1995). In the second place, comparative country research indicates that in the new generation of environmental policy plans in industrialised countries, there is an increasing trend towards integration within environmental policy (Jänicke, 1996, Jänicke, Carius and Jörgens, 1997). This trend is also in evidence in chapter 8 of Agenda 21. There too, plans are attributed an important role in integration within environmental policy.

The Dutch environmental legislation from the seventies - and the same goes for many other countries - had the character of a reaction to acute problems, and directed itself mainly to the separate sectors of environmental policy in which these problems manifested themselves most clearly, such as air and water pollution. The problem with this was that, as a result of such a sector-oriented or compartment-oriented environmental policy, there was insufficient recognition of elements of commonality in the policy, and that there was not enough attention to the shifting of problems from one sector of the environment to

another. The sectoral environmental policy offered little opportunity for tackling environmental damage spanning several compartments, or able to hop between them. In addition, such a sectoral environmental policy can lead to internal conflicts in the environmental policy, which undermines its effectiveness and legitimacy. In the third place, environmental policy with a strongly sectoral orientation delivers a greater administrative burden as a result of the co-ordination required. These problems form the core of the motivation for what is known as the internal integration in environmental policy - the integration between sectors of the environment.

Improvements that have been attempted in both the Dutch environmental policy and legislation were mainly concerned with a more integrated approach to environmental problems that had an impact on one another or were interrelated. Instrumental co-ordination through legislation and planning was seen as an important means to this end. An important role in breaking through the sectoral approach was played by the integrated environmental permit and environmental policy planning. The legal basis for the improvements was laid in the Environmental Protection (General Provisions) Act. This act, which was the forerunner to the Environmental Management Act, was a supplementary act in which sectoral environmental legislation was harmonised and rules were laid down for new, integrated subjects including planning. From the outset of the history of the Environmental Protection (General Provisions) Act at the end of the seventies, environmental policy planning was stated as one of the subjects to be addressed.

After that, at the start of the eighties, the role of planning as an instrument for integration was stressed<sup>ii</sup> in successive justifications to budgets. These developments led to the introduction of a new environmental policy planning system in the Environmental Management Act in 1993, the principles for which had already been formulated in 1984 in the policy document entitled 'More than the Sum of its Parts'. For the introduction of the new Plans part, the Netherlands had already acquired almost twenty years of experience with sectoral environmental policy plans (see table 1 below). The main goal of the new planning system is, according to the Environmental Management Act, to contribute to the consistency of

implemented environmental policy. But the Plans part of the Environmental Management Act also has roots in the harmonisation and need for integration of the sectoral green plan obligations. Much sectoral environmental legislation contained plan obligations in the area of water quality and quantity, noise, soil and waste at national and provincial levels (see table 1).

In the policy document 'More than the Sum of its Parts', planning is defined as: 'the development and maintenance of Statements of Future Intent in the form of plans to be able to take future decisions rationally and in their mutual context, and to convince third parties (other authorities, enterprises, citizens) to take this into account in their actions and decisions. In the definition of planning, the taking of decisions in their mutual context was thus explicitly stressed as a goal of planning.

In the evaluation research that forms the basis of this article, the central question was: has the system of environmental policy plans at provincial level contributed to the envisaged improvement of consistency in the provincial environmental policy? In this article, the focus is on the role of the plan as instrument of integration. Firstly, the Dutch experience is described. Section 2 goes into the concrete problems within the sectoral green planning system that gave rise to setting up a new planning system. At the same time, the core of the system is described. In this, the functions of the core elements of the planning system at provincial level are covered, viz. plan, programme and ordinance. Section 3 goes in more depth into the theoretical background of the new planning system, within the general context and period in which the planning system came about. In section 4, we cover the structure of the research with respect to the relevant part of the evaluation. We provide an answer to the question as to what has come of the envisaged consistency in provincial practice in section 5. We then consider in section 6 the question of how to improve the contribution of planning to consistency in environmental policy.

Experience with the new planning system at provincial level in the Netherlands, which we present in this article, begs the general question of what are the limits to integration in environmental policy by means of plans. In the concluding remarks, we attempt to draw a number of theoretical and practical lessons from the Dutch planning experience.

## 2. PLANNING IN DUTCH ENVIRONMENTAL POLICY

The establishment of a new planning system in the Environmental Management Act had its origin in the problems observed with the sectoral environmental plans incorporated in environmental legislation. The problems with sectoral environmental plans were raised at the start of the eighties in various reports and recommendations (RARE, 1982; Drupsteen 1982; CLAT, 1981; IBW, 1981; VCRMH, 1981; PIM, 1983).

The most relevant observed problems were as follows:

- the predominant lack of a long-term view in policy planning;
- the large number of plans and the lack of consistency among them;
- insufficient consistency between green plans and plans in other policy areas;
- the divergent content of the various plans;
- the lack of consistency between plans at national level and other levels of government;
- the unclear relationship between plans and other instruments.
- the lack of clarity and the complexity of the sectoral planning system;
- the orientation towards cleaning up environmental damage rather than conducting a pro-active policy.

The need for integration and co-ordination is related to a general need felt in the Netherlands in the seventies and the early eighties for more consistency in policy (Government Department Main Structure Committee, 1980):

- in the absence of bringing policies into line with each other, a given target group is confronted with inconsistencies (relationship in target groups of policy);
- in the absence of bringing policies into line with each other, the effects of various problems are likely to accumulate (relationship of social effects);

- in the absence of bringing policies into line with each other, problems have the opportunity to persist to some extent (related causes).

Also, in cases of environmental problems in different sectors or environmental compartments, it is often the same substances, common sources and the same areas that are involved.

Table 1 shows the tangle of plan obligations that arose at provincial level in the seventies and eighties. As answer to the above problems of sectoral planning, an integrated environmental policy plan was suggested in almost all the above reports and recommendations. The principles of a new system of environmental policy planning were outlined in the policy document 'More than the Sum of its Parts' (TK, 1983-1984, 18 292) of 1984 by the then Minister of Housing, Spatial Planning and Environment. The most important elements of this new system were:

- the replacement of the separate plans for parts of environmental policy by a plan figure: one strategic environmental policy plan with a period of validity of four years, in combination with a programme of implementation to be determined annually;
- no hierarchical relationships between plans of different government levels; mutual alignment of government bodies via an administrative route and the authorisation of ministerial orders;
- plans without immediate legal consequences; supplementary legislation required for creating legal effects; the plans are not voluntary, but it remains possible to justify deviation from the plan for serious cause.

The new planning system at provincial level is given in table 2.

At the provincial level, these proposals mean the following. The internal integration acquires substance mainly through the combination of the plan functions of the existing sectoral sub-plans into two plans: one provincial environmental policy plan and one implementation programme. In the first instance, these plans served the plan function of fulfilling the waste management plans, the programmes of intent for

silence and soil protection areas and the groundwater protection plan. Above all, the environmental functions of the groundwater plan and the water quality plan would have to be taken over<sup>iii</sup>. The new planning system has three core elements at provincial level: strategic environment plan, operational implementation programme and provincial environmental ordinance. A strategic policy formulation was to be arrived at because of the fact that the provincial environmental policy plan contains the strategic medium-term targets and choices, in other words the main themes of the policy. The planning system talks of an internal and an external function of environmental plans. Plans have an internal function as a guideline for the actions of the government itself. As stated in section 1, the taking of decisions in mutual context is explicitly stated as a goal of planning. The taking of decisions in mutual context forms an important aspect of the internal function of plans. According to the legislative proposal, putting this internal function of the plan first means 'the environmental policy plan has the main goal of promoting the effectiveness and the internal consistency of environmental policy' (TK, 1988-1989, 21 163, no. 3, p. 19-20).

Plans also have an external function, in the sense that outsiders can direct their behaviour under the influence of the contents of the plans. This external function is, on the one hand, achieved through the provision of clarity regarding the line of conduct of the government and, on the other hand, through an appeal made to third parties outside the planning subject to adjust their own decisions and actions in line with the proposed government policy in the plan. This external function is not binding, which would require a provincial ordinance.

The provincial implementation programme contains the operational choices, in other words the proposed activities and decisions for the implementation of the environmental policy plan. In the old sector sub-plans, these decision levels were often combined in one (sector) plan. The implementation programme has to be drawn up every year by the Provincial Executive, preferably in conjunction with the budget, for a period of four years. The environmental policy plan would have to be directive for a period of from eight to ten years, with due consideration to the long term. The environmental programme mainly envisages

bringing about an effective organisation of the implementation of a sound budget policy. The programme comprises the activities to be performed for the protection of the environment for the coming four years, the main aspects of which are given in the plan, and a report of the progress of the implementation of the applicable environmental policy plan.

The third core element of the planning system is the provincial environmental ordinance. The function of the ordinance is to offer a common framework for rules for the protection of the environment in conjunction with the provincial environmental policy planning. The ordinance offers the possibility of enforcing elements of the plan in a binding way. For example, environmental quality requirements can be included in the ordinance.

### 3. THEORETICAL BACKGROUND TO THE ENVIRONMENTAL PLANNING SYSTEM

A senior official who was closely involved in drawing up the Environmental Protection (General Provisions) Act (Biezeveld, 1989) has pointed out that the origin of the sector plans was not grounded in a well thought-out view of the function of planning within the new policy of the environment, but rather on the idea that a new policy that was still developing could not exist without planning. He saw this in relation to the expectations with respect to planning prevailing in the seventies.

The new planning system is a reflection of the Dutch planning thinking in the eighties. In the first place, because in the recognition of the internal function of the plans, the decision-centred view of planning (Faludi, 1987) was followed. In this approach, plans are a tool for the planner in later decision making, to facilitate making 'better' decisions in the future. Better means more consistent with other decisions and taking more account of future effects. In the assignment of the external function to plans, the planning system follows the policy document 'Planning as Enterprise' of the Dutch Advisory Council on Government Policy (1983). The external function of the plans is, on the one hand, related to the function

of plans for shedding light on the actions of the planning subject (plans and policy rules) and, on the other hand, on the persuasive function of plans in internalising the environmental policy.

In the third place, the design of the legal binding of plans, as expressed in the chosen ‘take due account of’ construction (for example in the provincial wastemanagement plan even ‘in harmony with’) arises from discussion in the planning literature on flexibility (insecurity) and legal security (Thomas et al., 1981). In order to implement the binding elements, a ordinance is required.

Finally, the planningsystem carries traces of the Dutch deregulation discussion from the eighties. The discussion on deregulation in general and the rationalisation of planning procedures in particular (Plan Procedures Rationalisation Committee, 1986) has contributed to a Planning chapter with limited provincial plan obligations.

The arguments for a strategic provincial plan is general and not specific to environmental policy, but rather applies to all Dutch strategic provincial plans. A strategic provincial plan is important because the Provincial Council determines the policy framework within which the Provincial Executive is free to move in the implementation with the plan. Through the plan and the procedure that run through the plan, the Provincial Executive puts the public and other government bodies in a position to exercise influence on the substance of policy. Furthermore, once adopted, the plan provides clarity about the policy of the Provincial Executive for the coming period, in so far as there are no deviations from the plan.

#### 4. RESEARCH DESIGN

This article is concerned with a part of the evaluation research project of provincial environmental policy planning. We leave aside the investigation into the achievement of goals in terms of achieving the

envisaged environmental effects, as also the investigation of cost-benefit effectiveness of the integration into provincial environmental policy planning.

The evaluation research is characterised by a deductive approach in which the expectations of the planning system formed the starting point of the assessment.

The relevant steps in the research here were as follows:

1. A reconstruction of the assumptions in the planning system with respect to the harmonisation and fulfilment of function in the core elements plan, programme and ordinance, on the basis of an analysis of government documents.
2. Description of the manner of implementation of the planning system in the twelve provinces through the analysis of all current provincial plans, programmes and ordinances, as well as supplementary interviews with a structured questionnaire of 12 provincial planners, including an investigation of the function-conformance, the actual harmonisation constructions, the obstacles to implementation, the substance, the degree of integration of substance and the integrative function of the planning process.
3. A research after the performance (sometimes also called 'knock-on effect') of the plans in five case provinces, with respect to the consistency and integrated working of the plan, programme and ordinance. This performance research concerns the effectiveness of strategic indicative plans, in which the subject of investigation is not conformance with the plan, but rather performance. One may speak of performance where in subsequent decision making the deciding party was familiar with the plan and considered it relevant and proceeded to use it. Use does not necessarily imply conformance with the substance of the plan. Performance of a plan also exists if there is a justified deviation from the plan. This does justice to the legal 'take due account of' construction. In concrete terms, this research has focused on the performance of the provincial environmental policy plans directly in actual decisions and indirectly via the environmental programme and via the environmental ordinance. In addition, the performance research has focused on decision making in the sectoral environmental

policy fields and the traditional compartments. The performance research was based on interviews (49 interviews in 5 cases) and supplementary document analysis.

## 5. RESULTS OF THE EVALUATION

### 5.1 PERFORMANCE PROBLEMS

With respect to the performance of the planning system at provincial level, we can draw several conclusions. First of all that the new planning system has not led to the disappearance of the sectoral policy documents and plans. The objective of the planning system to achieve an integrated plan has not been achieved. It would appear that, contrary to the intentions of the planning system, not only do provinces still draw up sectoral policy documents, but also these sectoral policy documents play an important role in policy development at provincial level.

The second conclusion is that the Provincial Environmental Policy Plan does not fulfil the integrating function anticipated for this figure. The Provincial Environmental Policy Plan often functions more as an umbrella above the sectoral policy documents than as an integrating plan. Discussion was taking place as early as the eighties on the place and position of the Provincial Environmental Policy Plan, in which in broad terms the figure of umbrella plan stood against an exclusive integrated plan document (Coenen, 1986). The tendency, apparently, is that we are returning to the idea of such an umbrella plan that stands above and alongside the sectoral policy documents, but that does span the entire environmental policy field. The provinces and the national government (national environmental policy plans), however, for the time being continue to draw up environmental policy plans that span the entire environmental policy field.

There would seem to be an element of failure of the approaches and points of view used in establishing links. In spite of some initial scepticism, all the provincial governments have more or less adopted the environmental themes, target groups and areas as points of view in the Provincial Environmental Policy Plan. The well-known Dutch environmental themes (acidification, eutrophication, toxic and hazardous pollutants, climate change, waste disposal, groundwater depletion, squandering, resource management) has conquered dominant ground in the account of the state of the environment and the formulation of policy. At the provincial level, the themes have, however, had a limited integrating function. The problem in the area-oriented and target group-directed approach has been that the approaches have developed into independent implementation paths, rather than points of view in the preparation of the plan.

The fourth conclusion is that internal integration is achieved in the planning process, (normal) consultative structures and (integrated) projects. The planning process in particular has a strongly integrating influence. The fact of having been involved in the planning process means that performance already occurs. This can be called 'pre-performance' or 'advance effect'. The pre-performance of plans during the planning process would appear to have a greater significance than the plan as document.

## 5.2 ASSESSMENT OF PERFORMANCE PROBLEMS

How are we to assess the performance problems outlined above? The first problem is that many sectoral policy documents and plans continue to be made, contrary to the intention of the new planning system. In any case, it has to be concluded that the idea behind the planning system: the fewer the plans, the fewer the procedures and the more efficient they become, has not been brought about. Furthermore, question marks can be placed by the democratic value of sectoral policy documents, which although they replace parts of the Provincial Environmental Policy Plan, have never been put before a Provincial Council or a committee of state, and in some cases not even a Provincial Executive. The public participation in such sectoral policy documents is also much more limited than for the Provincial Environmental Policy Plan.

On the other hand, in addition to democratic considerations, there are also reasons for maintaining the Provincial Environmental Policy Plan as a four-yearly calibration mark. A certain advantage is gained through the Provincial Environmental Policy Plan in comparison with the sectoral plans. These positive integrative aspects of the plan are as follows:

- The Provincial Environmental Policy Plan forces all the parts of the policy to be laid out alongside each other periodically. This is not only an argument in favour of the Provincial Environmental Policy Plan but also for an annual compilation document of amendments (policy programme).
- The Provincial Environmental Policy Plan encourages consistency in approach and the application of central ideas and concepts ('conceptual performance' of the plan).
- The plan fulfils such functions as demanding attention for its own policy area and communication on the substance of the policy.

Moreover, the question can be raised as to whether further internal integration could realistically have been expected. On the one hand, the problem analysis at the start of the eighties regarding the need for internal integration was somewhat exaggerated. The problems observed, such as the shifting of problems between sectors, would seem to occur less frequently in practice than was thought at the time. On the other hand, other internal integration mechanisms have come into operation for various reasons. Internal integration is also achieved through the planning process, (normal) consultative structures and (integrated) projects. A disadvantage of these alternative integration mechanisms is that they are insufficiently structural and mainly lead to integration in an ad hoc way. However, they are no less important for internal integration because of this.

What is the consequence of the fact that provinces still draw up sectoral policy documents for the integrative function of the plan? Looked at in a negative way, it could be said that the development of provincial policy proceeds through a codification of the sectoral policy documents in the Provincial Environmental Policy Plan and the announcement of new policy documents in combination with setting

down an interpretation of national policy. From a positive point of view, it could be said that the sectoral policy documents satisfy a need for topical policy development, which because of timing, clarity for the target groups and partners, and physical size of the Provincial Environmental Policy Plan, cannot be fulfilled annually by the Provincial Environmental Policy Plan.

Various provincial respondents also made comments in this light regarding the relationship between internal and external integration. In the first place, it has been remarked that the considerable attention to external integration is a sort of compensation for the failure of internal integration. In the second place, the question has been raised as to whether the developments to area plans, or at least integration between Provincial Environmental Policy Plan, regional plan and water management plan, will not lead to even wider plans and still less depth, resulting in an even greater need for sectoral policy documents.

A more serious problem is that the Provincial Environmental Policy Plan has only a limited directive function in provincial practice. Through the investment in analysis in the plan, the future decision making would be more consistent with and take better account of future effects. This is also of importance from the point of view of effectiveness of the time invested in the analysis. A Provincial Environmental Policy Plan that is not directive, rapidly loses its function and degenerates to a desk drawer plan. Planning then becomes 'bureaucratic work creation of the first order'.

A number of causes can be cited for the lack of direction. The current generation of Provincial Environmental Policy Plans is not specifically provincial enough and the substance of the plans is too much a repetition of familiar national policy with no clear regional differentiation. This regional differentiation is of importance for the provincial plan cycle of exploration, reporting, planning and implementation. Setting priorities in provincial policy would ideally occur on the basis of specific provincial environmental problems. In the provincial environmental policy plans there is almost no element of intersectoral priority setting. There is an element of systematic priority setting within sectors (e.g. soil and noise improvement).

The Provincial Environmental Policy Plan quickly loses its actuality. A much heard remark from provincial respondents was ‘the Provincial Environmental Policy Plan is out of date as soon as it comes into effect’. Contrary to the expectation of the planning system, the Provincial Environmental Policy Plan does not function for the medium-term of 8 years, but at the most for 1 to 2 years, after which it quickly loses its topicality. The reason that the plan is out of date before the ‘ink is dry’ is partly a result of the character and the speed of provincial policy development.

There are, however, a number of other reasons, to do with points mentioned earlier, for the existence of the sectoral policy documents and the actuality. In the first place, there is usually a question of codification of policy formulated earlier at national level and in the Provincial Environmental Policy Plan. This gives the Provincial Environmental Policy Plan the character of a snapshot of the state of policy development at that time. In the second place, sectors sometimes wish to keep their options open regarding the current policy formulation.

The necessary partial changes of the plan remain an unclear point because the planning system provides little formal regulation of it. In principle it cannot be the intention to issue twenty partial changes of the plan in one year. On the other hand, it is of importance that partial changes have sufficient status. The various provincial governments each choose their own solution for this. We argue here in favour of a compilation document of partial changes once per year, preferably in the form of a policy programme (see below). The disadvantages of partial changes from democratic and integration points of view have already been stated above.

The provincial package of tasks is much more hybrid than the planning system assumes. With the various fields of policy, the provincial task operates somewhere on the continuum from contributing to executive government to autonomous policy development. In addition, the provincial government is always subject to centralisation and decentralisation trends. An executive task can be expanded with a number of policy development or co-ordination tasks. In addition, the various sectoral environmental policy fields are also in various stages of development. The degree to which a field of policy has been put on the rails or is still

subject to major changes, also has consequences for the shape acquired by the strategic policy formulation. Furthermore, a distinct character can be discerned in terms of provincial role and provincial scope for policy-making.

By hybrid plans we mean that they are directed to both strategic and operational elements. The policy elements then go to fulfil totally different functions in the plan. It varies between demanding attention for its own field of policy, communicating the environmental problem, responding to national policy development, delineating the framework of execution, etc..

## 6. STRETCHING THE LIMITS OF INTEGRATION

The assessment contains a number of recommendations that have partly found their way into the recommendations and the discussion of the future of the provincial planning system. The following recommendations are relevant to the potential of the integrating function of plans.

In the first instance, these plans served the plan function of fulfilling the waste management plans, the programmes of intent for silence and soil protection areas and the groundwater protection plan. Above all, the environmental functions of the groundwater plan and the water quality plan would have to be taken over<sup>3</sup>. To enhance the integrating effect of the plan, critical attention is required into the use of the integrating points of view in establishing links between the various parts of the plan in both the description of the state of the environment and in the policy formulation. The selection of a problem-oriented approach has to be given an important place in the plan. This has the advantage that policy can be placed both within and outside the environmental policy field. With this, provincial governments connect directly to the specific regional problems they are confronted with, as a result of which they can make their own policy. The selected national points of view can be in agreement with this, but not necessarily. Taking complex integrated problems as the starting points for policy is beneficial for harmonising and integrating with other fields of policy such as spatial planning, water and traffic and transport. In addition, target groups and social groupings will be able to identify their problems much

better in the policy. In relation to the plan, the alternative integrating mechanisms must be used as much as possible.

Amendment of the Provincial Environmental Policy Plan must be carried out with care because it is, after all, a democratically determined document. If this does not occur through formal partial amendments, then the status of pending amendments in the plan must be clearly indicated. Via a system of degrees of hardship, the adjustment and status of the adjustments must be arranged in the Provincial Environmental Policy Plan, as was originally suggested in the planning system. In combination with the above stated policy angle of related problem-oriented issues objectives for the medium and long terms have to be formulated. The plan period of four years is possibly too short in relation to other solution directions. The plan could certainly acquire a more strongly strategic character if the programme is 'upgraded' to a policy programme, as a compilation document in which the policy developments are included every year (see 3).

The current operational environmental programme can be replaced by a policy programme that on the one hand functions as a compilation document for partial amendments of the Provincial Environmental Policy Plan, and on the other hand as an outline activity summary. This offers both a solution to the problems surrounding the actualisation of the Provincial Environmental Policy Plan and the duplication problem between environmental programme and departmental work plans or sectoral work programmes.

Amendments in the form of sectoral policy documents are not undesirable with this, and given the dynamics of the provincial environmental policy, they are unavoidable. The introduction of separate planning cycles for sectoral fields of policy is undesirable. A wholly individual planning cycle seriously undermines the possibilities for internal integration. In addition, it is of great importance that the Provincial Environmental Policy Plan continues to function as a periodically recurring internal integration event, also through the linking with the planning process and implementation path. To avoid confusion on the position and status of the various sector plans, it is desirable to include the plans to be made for all

provincial governments in the planning system. With this, current practice acquires structure, so that it takes place in a less ad hoc and fragmented way.

In relation to the formulation of individual provincial and area differentiated policy, the ability for developments at national level to influence the topicality of the plan is prevented to a significant degree.

At the same time, a bridge is made to continued and future harmonisation and integration with other fields of policy and plans such as the regional plan. This matches up with the observed needs. As soon as they move outside their own field of policy, many environmental sectors find not only environmental sectors but also other fields of policy appropriate for harmonisation and integration.

Imposing uniformity on provincial policy functions cannot be arranged through a planning system. The allocation of policy functions and tasks is an autonomous process (cf. the current discussion of tasks being conducted by the various levels of government). The planning system could offer a structure or a framework for where and in what way various functions and tasks are to be processed in the plan, programme and ordinance. In addition, it remains true that policy tasks belong in the plan with respect to strategic policy choices, while the operational and implementation tasks belong in the programme.

## 7. CONCLUDING REMARKS

In general, government tasks became steadily more interwoven after the Second World War as a result of increasing government intervention, and with this came a greater need for co-ordination between government departments and between administrative levels. Rational-comprehensive decision-making (also known as synoptic orthodox planning or total planning) aimed to include every possible detail in both the process of knowledge gathering and of knowledge management. Great planning thinkers such as Hayek and Popper have called such a view into dispute. The all-knowing planner with a total vision of the general interest would attempt to know and control as much as possible, from a position of hierarchical decision-making power at central level. Planning in all areas would be co-ordinated and all the

consequences would be considered. In this way, planning was seen as a scientific tool based on scientific knowledge, which is able to work more or less independently of political and social relationships.

Planning lessons from the fifties and sixties (see f.i. Mastop and Van Damme, 1997) teach us that general policy co-ordination and area planning are necessary with an eye to the long term, but that the number of aspects that can be taken into account is limited. Therefore, it is sensible only to integrate where it is necessary to do so; there are no limits to the scope of the parts of policy to be integrated. The idea that it would be possible to integrate the (albeit grey) entire provincial sectoral environmental policy into a single integrated plan was a fallacy. This insight is backed up by the knowledge that the provincial environmental tasks are strongly hybrid in nature (policy, co-ordinating or executive). If, regardless, an all-embracing environmental plan should be drawn up, it will become apparent that, because of the dynamics of the field of policy, new fragmentation will take place consequent to the plan.

Another lesson (see also Wissink, 1997) is that a plan cannot be all-embracing and executive at the same time. This lesson is also confirmed in our investigation; the fact that the sectoral plans appeared to be necessary because the step from environmental policy plan to execution was seen to be too great. This also implicitly calls for focused integration of parts according to need. It is necessary in cases where environmental problems are not susceptible to sectoral solution, that a sufficiently coherent environmental problem is present for an integrated approach also to be sensible. This further underpins the problem-oriented approach. Among the remaining sectoral environmental policy, consistency can be guaranteed by means of harmonisation and co-ordination.

Selectivity in integration further follows from the negative effect of the stacking up of functions. If the plan has (primarily) an integrating function, or is directed to the improvement of consistency, then it would be sensible not to link any conflicting functions to the plan. Non-conflicting functions can also have a disruptive effect under certain conditions, for example because it is no longer clear which function prevails. Moreover, consistency can also be achieved by means other than plans. Through what has been called the advance effect of plans, the importance of internal integration decreases. It is not the plan as a

document that is important and determinant for what is done with the substance of the plan, as assumed in the planning system, but the integration and exchange of information in the course of the planning process. On the other hand, the limited integrating role of the environmental policy plan is possibly explained by the fact that the planning system is too directed to integration of environmental sectors in the plan rather than to integration of decision-making on the basis of the plan.

As has been stated, the plan is not the only co-ordination instrument. The decision-centred view of planning itself offers a number of solutions for the relationship with the planning process. These interorganisational factors have not been carried over into the operationalization of the notion of planning in the planning system. One of the lessons to be drawn from what is known as utilisation research of social-science research is the importance of key actors. The performance of environmental plans appears to depend strongly on the presence of such a key actor within other departments, who propagates the plan within his own department. Friend, Power and Yewlett (1974) use the terms 'reticulist' and 'connective planning'. The development of a planning process is in part dependent on the capacity of the key actors to build up informal networks of personal contacts. Persons with these capacities are called 'reticulists'. Friend et al. are in favour of placing these reticulists in strategic positions as a significant condition for interorganizational planning. The actors within the provincial government should aim to create a common 'plan-as-reference-framework'. Key actors or reticulists appear to be crucially important in the use of plans in such a context.

TABLE 1 SECTORAL PLANNINGSYSTEM

Water		Soil		Noise	Waste
Surface water		Ground water			Toxic Other waste
Quantity	Quality	Quantity	Quality		
provincial	water	plan		Intention programm e	Intention programm e silence areas
operationa l part	water quality plan	groundwater plan	groundwater protection plan		Waste treatment
	operationa l part		Soil contamina tion clean up programm e	overview noise measures programm e	plans (5X)



NOTES

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<sup>i</sup> The evaluation research was performed by the Centre for Clean Technology and Environmental Policy of the University of Twente and the School for Environmental Sciences of the Catholic University of Nijmegen.

<sup>ii</sup> For example, the following is stated: *'Effective internal integration requires general environmental management plans'*. These plans have as function *'the reinforcement of internal consistency of environmental policy by offering an opportunity for early harmonisation of decisions in various sectors of policy'*<sup>ii</sup> (TK,1983-1984, 18 100, Ch. XI, no. 2, p. 67). The reinforcement of consistency in environmental policy would *'receive a strong impulse from the bringing about of a progressive long-range plan at various administrative levels, in which attention is paid to all aspects of the environment in its mutual context, and in which it is indicated as far as possible what policy will be put into effect in the years to come with due regard to this'* (TK, 1982-1983, 17 600, Ch. XVII, no. 2, p. 166).

<sup>iii</sup> The industrial noise and soil protection rationalisation programmes were not be included in the first instance in the environmental policy plan on the basis of their inherent character and requirements with respect to procedure and substance.