



# Public participation and written submissions: A transport infrastructure planning case study



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## ABSTRACT

Written submissions or comments as a response on an EIS (Environmental Impact Statement) rank as one of the most common forms of public participation. Within public participation research there appears to be an international dearth of knowledge concerning such written submissions. The possible impact of such responses on an EIS is – with few exceptions – seldom put in focus. The aim in the present brief communication is to study one aspect of public participation within transport infrastructure planning, namely the role of written submissions sent to the applicant by individuals, Non-governmental organisations, companies and authorities. By comparing 34 written submissions with road planning documents (including EIS) the impact of the public views has been analysed in a south Swedish case study. At a time when the new Environmental Code only had been in force for less than one year, it does not appear as if the Road Administration's regional office accepted most of the written submissions just to show that the new regulation concerning participation had a direct impact on the planning. Sweden's long tradition of public access to official documents may explain why written submissions as one aspect of public participation worked well in the E18 highway planning process, because civil servants have long been taught to promptly furnish information and guidance, as well as to giving advice and other assistance to individuals in matters concerning an authority's activity. This study shows, then, that – if properly managed by the developer's street-level staff – the use of written submissions may improve the EIS from a stakeholder perspective and also make the stakeholders feel they are being taken seriously.

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## 1. Introduction

In the road-planning process, the developer has to consider and assess environmental qualities. This is done through the Environmental Impact Assessment (EIA) process, with the aim to bring about thoughtful and informed decisions. Data as well as the assessment of the impact and consequences that a planned activity may have, are presented in an EIA report known as an EIS (Environmental Impact Statement). However, it is not only the decision-makers that are supposed to be informed but also the public at large, organisations and business undertakings. Public participation may be taken to “[...] cover all forms of activities where the planner communicates with the user concerning planning” according to Wahl (2013: 107) and it should be important inputs at each stage in the EIA process (Wood, 2003). There exists a large body of

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research analysing and discussing public participation per se (e.g. Rowe and Frewer, 2000; Palerm, 2000; Reed, 2008) and its role within the transport infrastructure planning (Grossardt et al., 2003; Bailey et al., 2011) or its context of EIA/EIS is no exception (e.g. Ward, 2001; Webler et al., 1995; Wahl, 2013). The most readily form of public participation have been identified as public meetings (Lowndes et al., 2001). However, it is less common for the developer or its representatives to systematically canvass the locals' experiences, knowledge and suspicions of environmental impact using less traditional techniques such as focus groups, issue forums, citizen panels and questionnaires (Bickerstaff and Walker, 2001). One aspect of public participation within transport infrastructure planning is the role of written submissions (sometimes called pronouncements, statements, comments), i.e. documents sent to the applicant by individuals, organisations, Non-governmental organisations (NGO), companies and authorities.

Within an EIS context, written submissions rank as one of the most common forms of public participation (Wernham, 2007). Studies of written submissions are, however, more or less absent within current public participation research. For instance, there are no traces of it in the relatively new *Encyclopedia of Transportation's* section on public participation in transportation planning (Quick, 2014), and it does not appear to be a part of Swedish municipal traffic planning (Wahl, 2013). Some articles do mention the possibility for different stakeholder groups to send in written submissions to an EIS (e.g. Jones et al., 1997; Richardson et al., 1998; Bond et al., 2004; Wernham, 2007; Carmin, 2010). But the possible impact of such submissions on an EIS is – with few exceptions (Fitzpatrick et al., 2008) – seldom put in focus.

Instead the focus often lies on planning processes where written submissions are mentioned as one among several participation methods. For instance Sinclair and Diduck (2001) found that environmental assessment managers encourage the public to submit written statements, but that the managers did not provide assistance with the preparation of such submissions. They also state that requests for written submissions do not imply an equal opportunity to participate, which instead is made possible by active techniques conducive to critical reflection, such as workshops and simulation exercises. Moreover, in the study made by Fitzpatrick et al. (2008:15) it was argued that the Mackenzie Valley Environmental Impact Review Board, Canada, accepted most of the “scoping amendments submitted through written communication, thus demonstrating that participation had a direct impact” (c.f. Hilding-Rydevik, 2001).

Planning of public participation is conducted by individuals, that is, civil servants or bureaucrats at authorities on different policy levels. One aspect of planning decision-making thus concerns the way in which the planners interpret policies. Research has shown the relevance of street-level bureaucrats' behaviour to understanding the planning outcome (Lipsky, 1980; Hill and Hupe, 2002). The street-level bureaucrats are the civil servants closest to the day-to-day handling of a specific issue in practice. Although street-level planners are key actors, their work concerning handling routines it is still under-researched (Hillier, 2010; Tennøy, 2012). The aim here is to study the role and impact of written submissions sent by different stakeholders.

## 2. Research question

The present study is guided by the following research questions: (1) how are the written submissions handled by the street-level bureaucrats? and (2) why are they or why are they not successfully implemented in the EIS? This article takes these questions as its starting point in a case study of road planning in the south of Sweden. Using a single south Swedish case, the present study adds to academic research by studying stakeholders' written submissions per se and comparing them with an EIS of a road-planning process, which is not an internationally salient research issue.

## 3. The Swedish road-planning process

Between 1998 and 2012 the Swedish planning process for road building contained four steps: preliminary study, feasibility study, detailed design plan (also known as detailed development plan), and route construction plan, all of which result in written documents. An EIS is conducted in the second and third steps. The RARO (Road Administration's regional office, today superseded by the Swedish Transport Administration's regional offices) is the applicant or purchaser of the EIA. At the feasibility study stage, alternative routes are examined and consultation carried out with the County Administrative Board and the people directly affected by the project. Both can lodge their opinions on the project. Within the detailed design plan stage, the executor conducts an extended consultation with other government authorities, the general public, and any municipalities and organisations affected. The detailed design plan document will only concern the alignment which has been found to best satisfy the goals. These consultations should cover the location, scope, design, and environmental impact of the activity and the content and formulation of the EIS.

## 4. Public access to official documents

The right of public access to official documents is a part of the Swedish Constitution and dates back to 1766. The 20th century counterpart, the Freedom of the Press Act, states that everyone has the right to send a letter or message to an authority executive or registrar clerk (SFS, 1949), and the Administrative Procedure Act (SFS, 1986) states that the authority must as soon as possible provide information, guidance, advice and such other assistance to individuals in matters concerning the authority's activity. Here, such public comments as a response to an official report or action plan are called written

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