THE ROLE OF ENVIRONMENTAL CONSULTANTS IN MUNICIPAL ENVIRONMENTAL DECISION MAKING: A DISCOURSE ANALYSIS OF THE STRATEGIC ENVIRONMENTAL ASSESSMENTS (SEA) OF THE KWADUKUZA AND RUSTENBURG MUNICIPALITIES

BY

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ABSTRACT

Traditional approaches to policy analysis focus on the outcomes of environmental policy making and the relationship between the state and general public in the policy process. These approaches often overlook the policy process itself and the role of professionals, such as environmental consultants, as they are appointed by government to undertake work on behalf of the state. Environmental consultants are commissioned to work on projects, such as a Strategic Environmental Assessments (SEAs), in South Africa because of the complexity of the policy process and lack of capacity in government, especially at the local level. Although the local level is seen as the platform for reconstruction and development, service delivery, and economic growth in South Africa, local government faces several challenges in terms of individual, institutional, and environmental capacity constraints. These challenges create a situation in which there is not sufficient capacity to develop effective environmental policies. In the context of these capacity constraints, the state relies on the skills and experience of environmental consultants to manage the environmental policy process.

The aim of this research is to use a discourse analysis of the KwaDukuza and Rustenburg SEAs to understand the role of environmental consultants in the policy processes which inform municipal environmental decision making. The focus of this research is to interpret the role of environmental consultants and to understand the environmental policy process within the context of the challenges facing local government. In order to achieve this aim, the research focuses on two dimensions of environmental policy making. The first dimension of policy making examines the discursive concepts actors use within the new discursive spaces emerging at the local government level. The second dimension of policy making analyses the discursive spaces in which the environmental policy process plays out. The empirical analysis of the KwaDukuza and Rustenburg SEA policy processes are used to understand the environmental policy process and examine the role of consultants within emerging deliberative policy making processes.

Evidence collected from the interpretation of the KwaDukuza and Rustenburg SEAs show that several discursive concepts emerged during the SEA policy processes. The concepts included an ‘ecological modernization’ discourse, story lines such as ‘balance brown and green issues’, and policy vocabularies such as an ‘environmental’ policy vocabulary. The concepts were found to be instrumental in the way actors define, interpret, and determine legitimate solutions to particular

environmental problems. The three SEAs were also interpreted as a performance using four concepts; scripting, staging, setting, and performances. The evidence shows that these concepts can be used to understand the way actors position themselves and exert power in the policy process.

The key finding of this research is that environmental consultants play an influential role in the policy process due to a lack of capacity in local government on complex projects, i.e. a SEA. The role of environmental consultants in these policy processes to manage the process and produce the policy document. The consultants are responsible integrating existing data, specialists' reports and issues from the public participation process into the policy. Environmental consultants therefore strongly influence the discourses which frame the policies that ultimately inform and guide municipal environmental decision making. Although the evidence indicates that environmental consultants are appointed to undertake the majority of the work, the public officials play an important role in steering the project and ensuring that the policy includes government issues, aligns with existing policies and plans, and is what the municipality needs. The public officials are therefore not only influenced by the discourses of the environmental consultants, but the imperatives, such as economic growth, of the local, provincial, and national spheres of government.

PREFACE

The research described in this dissertation was carried out in the School of Environmental Sciences, University of KwaZulu-Natal, Durban, from February 2005 to July 2008, under the supervision of Prof. Dianne Scott

This dissertation represents original work by the author and has not otherwise been submitted in any form for any degree or diploma to any other tertiary institution. Where use has been made of the work of others, it is duly acknowledged in the text.

DECLARATION 1 - PLAGIARISM

I, Michael Van Niekerk declare that:

1. The research reported in this thesis, except where otherwise indicated, is my original research.

2. This thesis has not been submitted for any degree or examination at any other university.

3. This thesis does not contain other persons' data, pictures, graphs or other information, unless specifically acknowledged as being sourced from other persons.

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I, Michael Van Niekerk declare that this dissertation does not contribute to publications that form part and/or include research presented in this thesis (include publications in preparation, submitted, *in press* and published and give details of the contributions of each author to the experimental work and writing of each publication)

Signed:

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LIST OF ACRONYMS

AsgiSA	: Accelerated and Shared Growth Strategy for South Africa
CSIR	: Council for Scientific and Industrial Research
DAEA	: Department of Agriculture and Environmental Affairs
DBSA	: Development Bank of South Africa
DEAT	: Department of Environmental Affairs and Tourism
DPLG	: Department of Provincial and Local Government
ECA	: Environmental Conservation Act
EIA	: Environmental Impact Assessment
EMP	: Environmental Management Plan
GEAR	: Growth, Development, and Redistribution Strategy
IDP	: Integrated Development Plan
IEM	: Integrated Environmental Management
I&AP	: Interested and Affected Party
KLM	: KwaDukuza Local Municipality
NEMA	: National Environmental Management Act
NGO	: Non-Government Organisation
NWPG	: North West Provincial Government
PPP	: Policy, Plans, and Programmes
RLM	: Rustenburg Local Municipality
ROCLA	: Rustenburg Olifantsnek Corridor Landowners Association
SDF	: Spatial Development Framework
SEA	: Strategic Environmental Assessment
TOR	: Terms of Reference

CHAPTER 1: INTRODUCTION

1.1 Introduction

Environmental issues, such as pollution, loss of biodiversity, global climate change, and the depletion of natural resources, began to emerge within political debates in the 1960s (Dryzek 1997; Hajer 1995). The recognition of a looming ecological crisis spurred an era of scientific studies which sought to understand the consequences of current rates of development on the environment. This period of enlightenment was dominated by the positivist approach to policy making which assumes that science and knowledge creation is independent of politics. There was however a realisation in the 1980s that the debate over environmental issues is not only scientific, but also political. Policy making was no longer about seeking solutions to defined environmental problems, but resolving the related social conflict which emerges because policy makers pursue different interests.

Traditional command and control or regulation approaches to policy making are based on the assumption that the policy process is linear and in which government is the central driving force (Vigar and Healey 2002; Keeley and Scoones 2000). Within this linear process, competent policy makers assume that environmental problems are predictable and can be easily identified and defined. Policy makers assume that they have adequate information to evaluate alternatives and therefore make informed decisions. Policy making is however rarely a linear process as there are many ways in which environmental problems are interpreted and defined by different actors, which creates conflict over which is the more legitimate course of action. This particular situation is amplified in South African policy processes because of what Hajer (2005a) refers to as 'institutional ambiguity' and 'multi-signification'. Following the end of apartheid in 1994 and the establishment of democracy, the South African government inherited an institutional vacuum in which there were no pre-defined rules or norms in environmental policy making on how to move forward and no way in which to determine which of the different systems of significations or stakeholders interests were more legitimate.

Within this context it becomes increasingly difficult for traditional approaches to policy making and institutional structures of the state to formulate effective environmental policies which have the

desired social and economic outcomes (Karkkainen 2004; Connick and Innes 2003). This is the reason that several governments, including the South African government have begun to recognise the value that non-state actors, such as environmental consultants, can have on the policy process through various collaborative relationships or partnerships. Within these fluid networks, non-state actors interact with the state simultaneously and across multiple and overlapping scales (Bulkeley 2005; Hajer and Wagenaar 2003). The role of non-state actors within these policy networks is generally to plug the gaps in the state, such as a lack of capacity. Many states are beginning to use professionals, such as environmental consultants, within policy processes because of their ability to solve complex environmental issues and ability to mobilise and deploy the necessary expertise and resources (Evers and Menkhoff 2004). Blake and Mouton (1990) argue government officials may also use environmental consultants to attach legitimacy to environmental policies and offload accountability for controversial decision making.

One of the main reasons that local government in South Africa uses environmental consultants is the lack of capacity to effectively deal with environmental problems. In this context, the term capacity consists of three components; individual, institutional, and environmental capacity (Walmsley 2005; DPLG 2004; Cloete 2002). A lack of capacity in terms of these components creates several challenges which undermine the ability of local government to develop effective environmental policies. This scenario provides the starting point for this research.

In response to the growing pressure of development on the environment and requirements of legislation, many municipalities in South Africa are undertaking Strategic Environmental Assessments (SEAs) (KLM 2006; RLM 2006, Tourism KZN 2005; NWPG 2004). Due to the complexity of the SEA policy process and lack of capacity in local government, environmental consultants are often appointed to undertake SEAs (DEAT 2006). The KwaDukuza and Rustenburg Municipalities were selected as two case studies for this research because they had recently undertaken a SEA and environmental consultants had been appointed to manage the processes. Although there is no accepted definition of a SEA, a SEA in South Africa is referred to as a "process of integrating the concept of sustainability into strategic decision-making" (DEAT 2004b: 4). A SEA is used as framework for decision makers to identify the most suitable development for a particular area and the opportunities and constraints that the environment places on development.

As the focus of the policy analysis undertaken in this thesis is the policy process itself and not the policy outcomes, traditional approaches to policy analysis are considered to be inappropriate. This is because positivist approaches to policy analysis assume that there is a partition between the science which informs policy and politics (Hajer and Wagenaar 2003; Hajer 1995; Fischer 1993). This research adopts an interpretive approach to policy analysis as this approach does not assume that the creation of knowledge is independent of politics. Although there are many qualitative approaches that fall within this social constructivist approach to policy analysis, discourse analysis was chosen as the methodological framework because it emphasises not only the importance of language, but the way in which language is used to exert power (Hajer 2005b; Hajer 2005c; Hastings 1999, Hajer 1995). This research adopts Hajer's (2006; 2005a) "three-dimensional analytical model" of discourse analysis because the approach focuses on the language used and the performance of the policy process. The analysis of performance is an important dimension of discourse analysis as it provides further insights into the exercise of power which determine policy outcomes.

The model used in this research consists of two dimensions of policy making. The discursive dimension of policy making focuses on the language that is used in the discussions and deliberations around what that the SEA policy should contain. This dimension of the policy process is interpreted using three concepts; discourse, story lines, and policy vocabularies (Hajer 2006; 2005c; 1995). Discourse is arguably the most important concept and is interpreted as the common sets of ideas which are produced, reproduced, and transformed through particular policy making practices. Discourse can be seen as they way in which policy makers make sense of reality and assign meaning to particular objects or processes. The second dimension is the performative dimension of policy making and focuses on the practices in which discourse is produced, reproduced, and transformed. The performance of the policy process is interpreted through the application of four concepts; scripting, staging, setting, and performance.

This model also provides an affective approach to analyse the role of actors in the policy process, especially the division in the role of public officials and environmental consultants. In traditional approaches to policy making, the role of the consultant is to provide accurate, independent, and up to-date information to policy-makers, so as to inform environmental decision making processes (Evers and Menkhoff 2004; Karkkainen 2004). However, within the context of 'institutional ambiguity' and 'multi-signification' this arrangement and the division between the public officials

and the consultants may become blurred and fluid (Hajer 2005c; Macleod and Goodwin 1999). Consultants, due to many reasons, such as incapacity within the state, may be more integrated into the decision making processes than their assumed independent and disconnected role. In this situation, consultants play an influential role in environmental decision-making processes and gives rise to what can be called the 'consultancy state'. The following section outlines the aim and objectives of this research.

1.2 Aim and Objectives

The aim of this study is to understand the role of environmental consultants in environmental decision using a discourse analysis of the KwaDukuza and Rustenburg Local Municipality's Strategic Environmental Assessment (SEA). In order to achieve the overall aim of this research, several research objectives have been identified. These are as follows:

1. To examine the discourses, story lines, and policy vocabularies which frame the KwaDukuza and Rustenburg SEA policy processes.

2. To understand the performative dimension of the KwaDukuza and Rustenburg SEA policy processes.

3. To analyse the role of environmental consultants in the KwaDukuza and Rustenburg SEA policy processes and to examine how the consultants influence municipal environmental decision making.

4. To determine the applicability of discourse analysis as a methodology in the interpretation of the KwaDukuza and Rustenburg SEA policy processes.

The aim and objectives provide the framework for this research. It is within the boundaries of this framework that the following chapters discuss the background of the study, theoretical foundation, and methodological approach for the research. The following section provides an introduction to these chapters and outlines the structure of the thesis.

1.3 Structure of the Thesis

Chapter one introduces the study and presents the overall aim and research objectives of this research. The chapter also provides an outline for the structure of this thesis.

Chapter two presents the theoretical framework of this research and discusses the theories which explain policy making in the KwaDukuza and Rustenburg Municipalities. The chapter introduces social constructivism and the interpretive turn as the philosophical approach of this research. The chapter then discusses the interpretive approach of discourse analysis and its application in policy analysis. The section on discourse analysis examines the different approaches to discourse analysis and focuses on Hajer's (2006; 2005a) analytical model as this argumentative approach provides the theoretical and methodological framework for this research. The chapter focuses on the actors which are involved in environmental policy making; the modern state, environmental consultants, and key stakeholders. The final section of the chapter discusses environmental policy making and challenges facing environmental policy processes.

Chapter three presents the background of this study and outlines the context in which this research is located. The chapter introduces the two case studies; the KwaDukuza and Rustenburg Municipalities, and outlines the reasons why the municipalities made the decision to undertake a SEA. The chapter discusses local government and describes its developmental role at the local level in South Africa, key legislation which influences municipalities, and capacity challenges facing local government. The chapter outlines how the environment can be institutionalised within municipal structures and what environmental management tools are available to government, such a SEA.

Chapter four presents the methodological approach used in the collection and interpretation of data for this research. The chapter introduces the methodology of this research as an interpretive, qualitative approach to policy analysis. Discourse analysis provides an approach to policy analysis that seeks to understand the way in which actors' perceptions of reality influence the KwaDukuza and Rustenburg SEA policy processes. The methodology is largely based on Hajer's (2006; 2005a) 'three-dimensional analytical model' which provides a framework for identifying the concepts which structure environmental policy making. Dey's (1993) 'omelette' approach provides an

effective methodology for interpreting the influence of these concepts on the policy process. The chapter also outlines the challenges of this research.

Chapter five is the first of two chapters which present the results of this research. While Chapter five focuses on the discursive concepts of policy making, Chapter six explores the performative dimension of the policy process. Chapter five discusses the discourses, story lines, and policy vocabularies which frame the KwaDukuza and Rustenburg SEAs. Discourse is presented as the sets of ideas or concepts which structure the way in which actors interpret reality. Story lines and policy vocabularies are presented as the rhetorical devices which actors employ to frame a SEA process within a specific discourse.

Chapter six is the second results chapter of this research. The chapter focuses on the performative dimension of the KwaDukuza and Rustenburg SEA policy processes and discusses the way in which four concepts; scripting, staging, setting, and performance, shape the environmental policy process.

Chapter seven concludes this thesis by presenting the key theoretical concepts and findings of this research. The chapter discusses the results of Chapters five and six in terms of the theoretical concepts presented in Chapter two. The chapter focuses on two discussion points. The first discussion point is the applicability of discourse analysis in the interpretation of the KwaDukuza and Rustenburg SEA policy processes. The second discussion point aligns with overall aim of this research which is to understand the role of environmental consultants in municipal environmental decision making.

1.4 Conclusion

Within the context of the changes taking place in environmental policy making internationally and in South Africa, new interpretive approaches to policy analysis are emerging. The change in policy making includes the emergence of new institutional structures and the inclusion of non-state actors in environmental policy making. In contrast to traditional approaches to policy analysis, interpretive approaches do not focus on policy outcomes, but the policy process itself. The aim of this research is use discourse analysis as an interpretive approach to understand the role of environmental

consultants in environmental decision making processes. In order to achieve this aim, several objectives were identified. These objectives are to examine the language used in the policy process, to understand the performative dimension of policy making, to analyse the role of environmental consultants in municipal environmental decision making, and to examine the applicability of discourse analysis in the policy process.

CHAPTER 2: THEORETICAL FRAMEWORK

2.1 Introduction

Environmental Policy making has undergone significant changes in response to the concept of an 'ecological crisis' which emerged in the 1960s (Hajer 1995). These changes have only recently begun to emerge in South Africa, especially at the local government level (Pieterse 2002). The changes are associated with the shift from government to governance and the emergence of policy networks in decision making processes. The significance of these changes to this research is that the institutionalisation of governance opens up political spaces for non-state actors, such as environmental consultants, in environmental policy making processes (Axtmann 2004). In order to understand the role of environmental consultants in municipal decision making it is important to examine policy making in the KwaDukuza Municipality and Rustenburg Municipality through the application of a body of contemporary literature.

The body of literature selected and presented here is framed within the philosophy of social constructivism and based on an interpretive approach to policy analysis (Refer to Section 2.2). Discourse analysis provides both a theoretical and methodological approach to policy analysis which is framed within a social constructivism philosophy and is therefore a form of interpretive analysis. While the theoretical concepts of discourse analysis are discussed in Section 2.3, the application of discourse analysis as the methodology of this research is presented in Section 4.3. There are several approaches to discourse analysis and that which is applied here is Hajer's (2006) 'argumentative' discourse approach. This approach is based on an analytical model which focuses on the interpretation of the language used and performative dimension of the environmental policy process. There are also several actors involved in the policy making process. Section 2.4 discusses the modern state, environmental consultants, and key stakeholders. With the shift in the modern state from government to governance, several challenges emerge for traditional approaches to environmental policy making. Section 2.5 discusses environmental policy making and how these challenges lead to a redefinition of policy making and role of actors in the policy process.

2.2 Philosophical Framework

The philosophical foundation of this research is built on the philosophy of social constructivism and based on an interpretive approach to policy analysis. This is because both social constructivism and interpretive analysis are qualitative, interpretive, and focus on the meaning of social reality as the unit of analysis. This section begins by describing social constructivism and how it differs from the positivist approach within social science. The next section focuses on the interpretive turn within the social sciences, the nature of interpretive approaches, and how they differ from the positivist approach.

2.2.1 Social Constructivism

Social constructivism differs from the positivist approach in two ways. Firstly, the constructivist approach does not only focus on what language represents, but language itself (Terre Blanche and Durrheim 1999). In contrast to the positivist approach which assumes that language is a transparent medium for communicating facts or personal experiences, social constructivism recognises that language is also used to construct reality. The constructivist approach focuses on the way in which language actively shapes the actors' interpretation of their world (Hajer 2005a). Social constructivism does not focus on language use or structure, but the social meaning which is created by language (Fairclough 2003; Terre Blanche and Durrheim 1999; De Beaugarde 1997; Van Dijk 1997). The focus of analysis is on the signs and images which actors use to construct their own reality and how these underlie their experiences and representations of both people and objects. The signs and images reflect the way in which language is used during discussions to influence the interests and preferences of other actors and to shift power relations within policy processes (Hajer 2003b; Hajer 1995). Feelings, thoughts, and experiences can therefore not be seen as purely individualistic, but as products of larger discourses or systems of meaning.

Secondly, in contrast to the positivist approach which only focuses on language, social constructivism also focuses on the practices within which these systems of meaning or discourses are produced. Van Dijk (1997) refers to these practices as the co-text of language. Constructivist methods emphasise the importance of context because actors are not completely autonomous, but restrained by the structures and processes which define their sets of possibilities (Fairclough 2003).

The context of language is therefore important because it not only influences the way in which problems are defined, but the way in which problems are compared to one another (Hajer 1995).

In order to understand how the reality of actors is socially constructed, the meaning embedded in language needs to be interpreted. Interpretive analysis can be used as an approach to policy analysis which attempts to uncover the meaning within the language used. The following section discusses interpretive analysis and focuses on the application of interpretive approaches in policy making processes.

2.2.2 Interpretive Approaches

The interpretive turn represents a shift in qualitative research techniques lead by disciplines, such as ethnomethodology, phenomenology, and hermeneutics (Mottier 2005). This section was included in the theoretical framework because interpretive approaches represent a theoretical turn in the way qualitative research is approached. This section discusses the theoretical concepts which distinguish interpretive approaches from the positivist approach. Interpretive approaches draw on the philosophical assumptions of social constructivism as interpretive analysis attempts to understand the constructions of meanings and way in which people make sense of their world. This is because interpretive analysis views the social and cultural world as a 'milieu' of meaning (Mottier 2005).

The interpretive turn emerged in response to the positivist approach which attempts to describe social reality in terms of objective accounts and remove the bias of subjectivity (Mottier 2005). In contrast to the positivist approach which attempts to produce objective accounts or observations of society and provide accurate descriptions of reality, interpretive approaches recognise that it is impossible to produce an objective account of reality because all methods are inherently flawed. The positivist approach also attaches a negative role to researcher subjectivity. In contrast to the positivist approach which assumes that the bias associated with subjectivity prevents researchers from accurately describing reality, interpretive approaches view subjectivity as a crucial part of qualitative research (Mottier 2005). This is because data collection is not seen as the passive extraction of information from participants, but as a mutually constructed and interpretive process between the researcher and the subject. Interpretive approaches therefore recognise that

interpretation and subjectivity is an essential part of qualitative research which cannot be separated from the research process.

One of the disciplines within which interpretive approaches can be applied is policy analysis. However, there is still a lot of debate within environmental politics over the methodological foundations of positivist policy analysis and interpretive policy analysis (Hajer 2003b). The aim of positivist policy analysis is to understand the unstable, interest-driven, and conflicting world of environmental policy processes using scientific knowledge and rationality (Wagenaar and Cook 2003). The assumptions of this approach is that the world can be known, that there is a dichotomy between actors and the world, and that facts or scientific knowledge produced are an accurate reflection of reality (Hajer and Wagenaar 2003; Hajer 1995; Fischer 1993). In contrast, interpretive policy analysis attempts to understand the policy process in terms of both content and structure. Interpretive approaches attempt to uncover the links between knowledge creation and politics which the positivist approach disregards. Interpretive policy analysis recognises that actors make sense of reality through particular signs and images which they use to construct systems of meaning. For example, Fischer and Forester (1993) argue that actors often use language within policy making to shape the way in which they perceive and understand the world. Although environmental problems are real and affect people in reality, policy makers may interpret or define these problems differently. This difference in interpretation provides the basis for political debate or dispute (Dryzek 1997). Positivist policy analysis also tends to describe environmental problems in terms of broad macro-sociological processes, such as globalisation or liberalisation (Hajer and Wagenaar 2003). In contrast, interpretive policy analysis focuses on the real underlying mechanisms at work. For example, the analysis would focus on how actors regard politics, which actors participate, how actors frame conflict, and to what extent institutions facilitate or hamper finding solutions to environmental problems.

In the context of this research, social constructivism provides an essential framework for understanding how reality is socially constructed through language. In contrast to the positivist approach, interpretive approaches to policy analysis attempt to uncover the meaning embedded in language, which shapes the environmental policy process. Discourse analysis was adopted as the methodology of this research because it is a specific interpretive approach which focuses on the broader systems of meaning that structure the way in which language is used. The following section outlines the theoretical concepts of discourse analysis and describes the different and nature of

approaches to discourse analysis. This section also discusses an 'argumentative' approach to discourse analysis and Hajer's (2006; 2005a) 'three-dimensional analytical model'.

2.3 Discourse Analysis

Discourse can defined as a "shared way of apprehending the world" (Dryzek 1997: 8), which determines the way in which actors' define, interpret, and negotiate solutions for environmental problems. It is the meaning that is embedded in language that interpretive approaches, such as discourse analysis, attempt to uncover. In the context of this research, discourse analysis can be seen as both a theoretical and methodological approach to interpretive policy analysis. The following section discusses discourse analysis as a theoretical approach to policy analysis by defining the nature of different approaches to discourse analysis. One of these approaches is 'argumentative' discourse analysis which is discussed in Section 2.3.2 and provides the theoretical foundation for Hajer's (2006; 2005a) analytical model which is examined in Section 2.3.3. Section 2.4 discusses several dominant environmental discourses.

2.3.1 Approaches to Discourse Analysis

Discourse has become a popular approach to policy analysis within the political sciences since the 1980s. The movement consists of several political scientists such as Healey (2003), Laws and Rein (2003), Dryzek (1997), Hajer (1995), and Forester (1993). A discourse analysis provides both a robust theoretical framework and a practical methodology for conducting research in policy making (Hastings 1999).

In its simplest form, a discourse analysis attempts to analyse how language is being used within a discussion (Hastings 1999). The analysis focuses on why a particular vocabulary is used, how this vocabulary has been interpreted, and what is achieved through the use of these discursive strategies. A discourse analysis can reveal the role of language in policy making, the meaning embedded in language, and the affect of these mechanisms on the policy process (Hajer 2005b; 2005c). For example, 'mobilisation bias' is a mechanism which allows some environmental problems, such as 'acid rain', to dominate political spaces, while other environmental issues are suppressed (Hajer

1995). In more complex applications, discourse analysis attempts to analyse not only language use, but the positioning of actors in relation to one another, and how language creates inequalities in power and develops norms of acceptable behaviour (Hastings 1999). The analysis focuses on the social effect of discourse in the policy process by interpreting the practices in which discourse is produced, reproduced, and transformed (Hajer 1995). This research adopts a complex form of discourse analysis because the analysis does not only focus on the interpretation of the discourses being used in the case studies, but also examines that performative dimension of the policy process.

A discourse analysis should not be seen as a single approach, but several variants that share similarities in ontology, epistemology, and methodology. Lees (2004) separated these variants into two opposing strands. The first strand draws on the ontology and epistemology of the Marxist tradition, especially the political-economy and structuralism (Lees 2004). Within this strand, a discourse analysis is used to reveal similarities in thinking and vested interests of actors. Discourse is viewed as rhetoric that conceals the interests and preferences of actors and how these are used to gain power over others. Language is the unit of analysis because it reveals particular narrative structures, the way in which issues are framed, and how story lines are used to close off certain lines of thought. In contrast to the first strand which focuses on who said what to whom, when and how, the second strand focuses on the wider constructions of reality in rhetoric (Lees 2004). The second strand draws its ontology and epistemology from post-structuralist theory. Within this strand, discourse is not only seen as a representation of reality, but systems of meaning which create their own reality. These constructed regimes of truth are what actors use to define environmental problems and find solutions to those problems. Lees (2004) argues that Hajer's (1995) approach to discourse analysis is based on both the structuralist and post-structuralist strands. This is because his approach does not only focus on discourse, but the way in which discourse gives meaning to social reality. The post-structuralist concepts of Hajer's (1995) approach to discourse analysis are strongly influenced by the works of Foucault (1997 cited in Hajer 1995).

Michael Foucault is one of the most influential thinkers of the twentieth century and falls within this second strand (Peet 1998). One of Foucault's greatest contributions to policy discourse theory is the power-truth-knowledge complex. Foucault (1997 cited in Hajer 1995) argues that actors which hold and create truth have power. This is because of the assumption there are no single truths, but only fragmented and discontinuous truths. Actors which create knowledge are also seen as having power because of the assumption that knowledge is not united or whole, but fragmented pieces of

information. However, the creation of knowledge and truth is also influenced by power through broader institutions and social contexts.

Hajer (2005d) identified two reasons why a discourse analysis should be used to analyse environmental policy processes. Firstly, a discourse analysis can be used to reveal the role that language plays within policy making (Hajer 2005d). Dryzek (1997) argues that the analysis of language is important as it is the way in which we construct, interpret, discuss, and analyse environmental problems. Environmental arguments should not be seen only as factual or scientific, but meaningful and suggestive because they affect the context in which the discussion takes place by limiting policy options and outcomes (Hajer 2005d). Hajer (1995) argues that language should not be seen as separate from the setting in which it is used. This is because discussions take place within operational routines and mutually accepted rules and norms which structure the actors' interpretation of reality. Language use should therefore not be seen as abstract to society but related to the particular practices in which it is employed (Hajer 2005d). A discourse analysis can reveal both the role of language, the meaning embedded in language, and the particular practices within which it is used.

Secondly, a discourse analysis can be used to highlight the bias in discourse and practices of the policy making process (Hajer 2005d). The analysis focuses on the assumptions, judgements, and contentions which condition discourses and the practices in which they are used. A discourse analysis can reveal how particular actors suppress the development of discourses that threaten their own interests or discourses. Actors are able to suppress competing discourses and advance their own interests by determining the terms in which environmental problems are defined and therefore the possibilities for action (Hajer 2005d; 1995). A discourse analysis focuses on the way actors use language to create signs and symbols that shift power balances and how discourse frames discussions. Therefore, a discourse analysis can be used to highlight how the dominance of particular discourses shifts in environmental politics.

One of the specific approaches to discourse analysis is 'argumentative' discourse analysis. The following section discusses the nature of argumentative discourse analysis and how it shapes Hajer's (2006; 2005a) analytical model which frames the theoretical and methodological approach of this research.

2.3.2 Argumentative Discourse Analysis

Hajer's (2006; 2005a) analytical model can be located within the interpretive turn in the social sciences as it is a social constructivist approach to knowledge. Argumentative discourse analysis is one of the interpretive approaches which emerged in the 1980s and has strongly influenced the works of several political scientists, such as Hajer (2006; 2005a; 2005b; 2003a; 2002; 1995), Laws and Rein (2003), Fischer and Forester (1993), and Healey (1993). Argumentative discourse analysis varies from traditional approaches to discourse analysis because this approach to knowledge does not only aim to interpret the meaning of the language used by the actors, but views the environmental policy process as a continuous battle over problem criteria, problem boundaries, the framing of problems, and problem solving actions (Fischer and Forester 1993). The key focus of this approach is the analysis of what is being said, to whom, and in what context (Hajer 2005b). Argumentative discourse analysis therefore concentrates on the interactions between actors, considers the effect of the setting in which the arguments take place, and how actors use these arguments to position themselves and other actors. The aim of argumentative policy analysis is not to interpret the arguments that actors use, nor how significant they are in relation to each other, but how they were produced (Fischer and Forester 1993). The focus is not only on the images and words of discourse, but the positions from which actors make their arguments. Hajer (1995) identifies three dimensions of policy arguments; *logos, ethos* and *pathos*. *Logos* refers to how convincing the policy argument is, *ethos* the reputation of the speaker, and *pathos*, the specific rhetorical strategies used. Therefore, environmental politics becomes an argumentative struggle in which actors try to make sense of the problem and attempt to position other actors through arguments. Hajer (1995) uses this approach to interpret how policy arguments or rhetoric depicts, selects, describes, characterises, and includes and excludes specific environmental issues.

Hajer (2006; 2005a) provides a useful approach to discourse analysis which is based on the principles of argumentative discourse analysis. The following section focuses his 'three-dimensional analytical model' and its application in the environmental policy process.

2.3.3 Hajer's Three-Dimensional Analytical Model

The next section presents the theoretical concepts that constitute Hajer (2006; 2005a) 'three-dimensional analytical model'. This model is applied as the methodology of this research because it provides a practical framework for collecting and interpreting detailed and in-depth qualitative data, recognises that power and knowledge are intertwined, and emphasises that practice is an important unit of analysis. Although this model consists of three dimensions, namely the discursive, performative, and deliberative dimensions, only two dimensions are applied in this research. This is because the third dimension which focuses on the deliberative quality of the policy process is beyond the scope of this research as the researcher was unable to attend the meetings and forums where deliberation took place. The following sections discuss the theoretical concepts of the other two dimensions which are the discursive and performative dimensions of policy making.

2.3.3.1 The Discursive Dimension of Policy Making

The first dimension of Hajer's (2006; 2005a) analytical model focuses on the discursive concepts in the policy process. This dimension is an important aspect of an interpretive approach to policy analysis because it highlights that knowledge creation is not independent of politics (Hajer and Wagenaar 2003). This is in contrast to the positivist approach which assumes knowledge creation takes place outside of the political arena. Based on an interpretive approach, words can no longer be seen merely as labels for objects, but a mental link between a mental image and an object (Hajer and Wagenaar 2003). These mental images need to be understood in terms of the context from which they emerged because this context is guided by social rules which have been internalised within society through long processes of socialisation. The interpretive analysis of the discursive dimension of the policy process attempts to understand the context in which actors draw meaning and to interpret the meaning of what they are actually saying.

Hajer's (2003a) paper '*A frame in the fields'* in which Hajer examines how a policy initiative of 'nature development' in the Netherlands triggered a large public protest provides a useful example of the application of argumentative discourse analysis. This case study focuses on the way in which particular discourses gained in dominance through the policy process while others were suppressed.

The paper outlines a methodological approach to discourse analysis which can be used to understand the complex ways in which meaning is hidden in discourse. The approach is based on first theoretically defining the 'terms of discourse' which describe "the institutional structures of meaning that channel political thought and action in certain directions" (Hajer 2003a: 104). This approach attempts to uncover the 'markers', 'structures', and 'patterns' within policy discussions and show that language is not only used to assign meaning, but also to shape reality (Hajer 2005a; 2003a). Although the terms of discourse consists of three layers, namely emblematic issues, story lines, and concrete policy vocabularies, this research only applied the latter two of these layers. The first layer, emblematic issues, was excluded from the analysis because this layer requires extensive analysis which is beyond the scope of a Masters thesis. In place of emblematic issues, this research applies discourse as the first layer of the terms of discourse. This is because discourse is similar to emblematic issues in the way that it frames story lines and concrete policy vocabularies, but is more specific to a particular environmental policy process.

Discourse

There has been a growing interest in the role of discourse in the policy process in recent years (Skelcher *et al*. 2005; Fairclough 2003; Wagenaar and Cook 2003; Hastings 1999). This interest can be linked to the rise of social constructivism and interpretive analysis as approaches to knowledge in the social sciences. In its simplest form, discourse can be seen as a single event of language use in which people use language to communicate their beliefs and ideas (Van Dijk 1997). In a more complex form, discourse can be defined a "shared way of apprehending the world" in which "those who subscribe to it to interpret bits of information and put them together into coherent stories or accounts" (Dryzek 1997: 8). This definition highlights how discourse can be seen as both a representation of the structures and processes of the social world and as a transparent medium through which pre-existing concepts and objects are communicated (Fairclough 2003; Chouliaraki and Fairclough 1999). Discourse can be seen as "embedded in language" and resting on the "assumptions, judgements and contentions" that provide the basis for debates, agreements, and analysis (Dryzek 1997: 8). Discourse is therefore an important component of environmental policy making as it conditions the way in which environmental issues are defined, interpreted, and addressed (Dryzek 1997).

If this definition of discourse is expanded to include context, discourse can be seen as a "specific ensemble of ideas, concepts and categorizations that are produced, reproduced and transformed in a particular set of practices and through which meaning is given to physical and social entities" (Hajer 2006: 45). Context is an important aspect of discourse analysis because a one-sided analysis which excludes the setting of the policy process may overlook the dimensions of power and interest inherent in discourse (Dryzek 1997). There are several examples of dominant environmental discourses which are discussed in Section 2.3.4. These include the 'survivalism', 'environmental problem-solving', 'sustainability', and 'green radicalism' discourses.

These discourses illustrate how discourse structures the way in which policy makers define, interpret, and address particular environmental problems. Although discourse is embedded in language and reflects a shared way of comprehending the world, policy makers need particular rhetorical devices to express discourse. One of the devices which policy makers use to communicate the rhetoric of discourse is the story line (Dryzek 1997). The following section focuses on story lines and their influence on the environmental policy process.

Story lines

Story lines are one of the 'terms of discourse' that are used to drive a particular issue or policy (Hajer 2003a). Story lines are statements which bring together elements of reality that were previously unrelated. Story lines attempt to bring about unity by acting as a central point around which actors attach their specific knowledge and expertise (Hajer 1995). Story lines provide some form of common ground in which actors with different perceptions of reality can work towards problem closure. This is the reason that story lines are defined as a "condensed sort of narrative that connects different discourses and thus provides the basis of discourse coalitions" (Hajer 2006: 45). Story lines can therefore be seen as a combination of different statements which reflect or support a specific discourse.

However, Hajer (2005d) argues the assumption of mutual understanding can be misleading. Just because actors share the same story lines it does not mean they understand each other because they might interpret the meaning of these story lines differently. Although story lines provide some form of agreement among actors, they often conceal the true discursive complexity of the policy problem.

Hajer (1995) argues that the true power of story lines is their multi-interpretability and the common understanding that they can provide for a number of actors. In this situation, actors that were previously independent, form coalitions around a particular set of story lines and begin to relate to one another. Hajer (2005b) refers to this situation as 'discursive affinity'. The affinity occurs when actors use arguments which share a similar way of conceptualising or framing the world even though the policy arguments emerge from different origins. Therefore, story lines also allow actors, such as public officials, environmental consultants, and key stakeholders, to expand their own discourse of competence and expertise. This is because actors use story lines to show where their work fits into the jigsaw or complexity of the policy problem.

Another function of story lines is to provide permanence to the debate (Hajer 1995). This is because story lines represent figures of speech which give a sense of rationality to particular policy problems. For example, the use of narratives such as 'sustainability' within the context of environmental management has given this particular story line a seemingly permanent presence within most environmental debates. In this context, whenever an actor discusses environmental policy, environmental management or strategic environmental assessment, the story lines of 'sustainability' or 'sustainable development' would enter the discussion, although each actor might interpret these concepts differently.

The final function of story line' is to position actors and provide the foundation of discourse coalitions (Hajer 1995). Through the process of positioning, policy makers not only position themselves, but the other actors around them. This point can be illustrated using the project steering committee meetings from the Rustenburg Priority Area 2 SEA. During these meetings, the public officials who included the North West Provincial Government and Rustenburg Municipality would position themselves together as the clients and separate from the environmental consultants and public participation consultants who were the specialists and service providers.

There are several examples of story lines that have been used in policy processes. Hajer (2005b) uses the story line of 'acid rain' to illustrate how dead trees are victims of industry and that action needs to be taken. This story line can also be seen as a metaphor because acid rain represents something else; the dead trees. Lubke (2004) identified several story lines in her analysis of the eThekwini Catchments Project. One of these story lines which reflects or supports the sustainability discourse that Lubke (2004: 103) identified is 'social, economic and environmental aspects need to

be balanced in development'. This story line reflects the interconnected nature of sustainable development which considers the biophysical, economic and social issues.

These examples of story lines illustrate the way in which actors use story lines to express particular discourses, add permanence to a political debate, and position themselves and other actors into discourse coalitions. However, story lines are not the only way in which discourse frames the policy process. The following section focuses on policy vocabularies and their importance in the policy process.

Policy Vocabularies

Hajer (2003a: 10) defines policy vocabularies as "sets of concepts structuring a policy, conspicuously developed by policy-makers". Policy vocabularies refer to vocabularies which actors conspicuously include in policy for various reasons. These vocabularies can be seen as sets of concepts which are used as a rhetorical device to structure or frame a particular policy within a specific discourse.

Lubke (2004: 88) identified three broad policy vocabularies in a discourse analysis of the eThekwini Catchments Project. These are the 'sustainability/sustainable development', 'environmental management', and 'spatial planning' policy vocabularies. Using the 'spatial planning' policy vocabulary as an example, several concepts were identified that structure the eThekwini Catchments Project policy. The vocabulary consists of concepts, such as 'urban containment', 'densification', 'compact city', 'consolidation', 'urban edge', 'infrastructural fence, nodes and corridor's, 'areas', 'spatial issues', and 'land use management' (Lubke 2004).

The three concepts of discourse, story lines, and policy vocabularies constitute what Hajer (2006) refers to as the discursive dimension of policy making. The dimension focuses on the linguistic elements of the policy process, such as what was said, to whom, and in what context. Hajer (1995) however argues that policy arguments do not take place within an 'institutional vacuum', but within new and existing practices. Although conventional approaches to discourse analysis only focus on discourse and its rhetorical devices, namely story lines and policy vocabularies, it is important to also examine the policy process as a performance in which discourse is produced, reproduced, and

transformed (Hajer 2005c). The following section focuses on the performative dimension of the policy process.

2.3.3.2 The Performative Dimension of Policy Making

The performative dimension of policy making is the second dimension of Hajer's (2006; 2005a) analytical model. This dimension is an important aspect of an interpretive approach to policy analysis because it focuses on the concepts related to the practices within the policy process. This is in contrast to the positivist approach to policy analysis which only focuses on environmental problems and solutions (Wagenaar and Cook 2003). In its simplest form, practice can be seen as the realm of doing versus the realm of thinking. In more complex applications, practice refers to the "the operational routines and mutually accepted rules and norms that give coherence to social life" (Hajer 2005a: 7). This definition emphasises that actors incorporate their values, beliefs, resources, and external environment into practice. Practice therefore represents a relation between the actor and their context (Hajer and Wagenaar 2003; Wagenaar and Cook 2003).

In the context of this research, practice refers to the performance of the policy process through which discourse is produced, reproduced, and transformed. Hajer (2005a: 11) describes performance as 'dramaturgy' or the specific political-symbolic context in which policy making takes place. Dramaturgy can be seen as the theatrical dimension of policy-making because discussions are not interpreted as merely talk (Hajer 2006). These discussions can be seen as an act that takes place within a particular setting and in which the setting affects the quality of the act (Hajer 2006; 2005c). The analysis of the performative dimension can highlight how certain meanings are constantly reproduced, how significance is enacted, and that this is staged within a particular setting (Hajer 2006). The performative dimension consists of four concepts; scripting, staging, setting, and performance (Hajer 2006; 2005c). These concepts provide the framework for interpreting how the performative dimension of the environmental policy process affects the outcome of the policy.

The concept of scripting is defined as "those efforts to create the setting by determining the characters in the play and to provide cues for appropriate behaviour" (Hajer 2006: 49). Scripting consists of two aspects. The first is the actors and their respective backgrounds, and roles and

responsibilities within the policy process. The second aspect is the main script that brings all these actors together and provides the cues which determine the actor's appropriate behaviour. Hajer (2006) argues that actors specifically use scripts in order to achieve a particular outcome or result in the policy process. The way in which the policy process is acted out is according to the script that the various 'directors' have in mind. However, these scripts should not be seen as static, but constantly evolving as new actors and scripts continuously enters the policy process (Hajer 2005c).

The concept of staging is defined as "the deliberate organisation of an interaction, drawing on existing symbols and the invention of new ones, as well as the distinction between active players and audiences" (Hajer 2006: 49). This concept is an important aspect of analysis because the deliberative quality of a discussion is not only determined by setting or the performances used, but the way these factors interrelate to produce a particular staging (Hajer 2005c). Staging refers to the stage which actors set before they intend to play out a particular performance (Hajer 2006). Actors use old and new symbols as devices to either reinforce the existing stage or to bring about a new staging of the policy process.

The concept of setting refers to the "the physical situation in which the interaction takes place, including the artefacts that are brought to the situation" (Hajer 2006: 49). Setting is an important aspect of analysis because just as people do things with words, settings do things with both people and words. Setting can be seen as defining the act and this is the reason that actors often consciously choose the settings (Hajer 2006). However, setting is not merely about the physical location, but also the props which the actors use within these settings. These props are symbols which are often overlooked because they are taken for granted or seen as routine practices. They however, give power during these interactions to those actors who know about them and use them. Hajer (2006) refers to the 'hammer' which a judge uses in the court room to mark a decision as an example of a prop and a symbol of power because the judge uses it exert influence over the other actors in the setting.

The concept of performance is arguably the most important concept of the performative dimension. Hajer (2006: 49) defines performance as "the way in which the contextualised interaction itself produces social realities such as understandings of the problem at hand, knowledge, new power-relations and trust". Performance is about making something or of mutual creation, such as a decision or policy (Hajer 2006). In order to understand the importance of performance, policy

making needs to be interpreted as a sequence of staged events in which actors deliberatively decide on how to move on (Hajer 2005a). This is because the policy process is characterised by conflict and misunderstandings as actors have their own interpretations or understandings of the policy problem. The challenges in environmental policy making which cause conflict and misunderstanding are discussed in Section 2.5.2. In this conflicting situation, actors need to create a new shared understanding and decide on how to move forward towards a decision. The concept of performance refers to way in which actors determine what the 'rules' are, what the appropriate time frame is, and what interventions can be considered legitimate. A successful performance sets the rules and routines, generates trust, and guides expectations. Policy making should be seen as an artistic endeavour and discourse analysis as a method for revealing how actors skilfully persuade others to push for their own interests and suppress others. However, actors need to perform in such a way that the other actors trust not only them, but the policy process itself. In this way, both accountability and trust is generated through the discussion.

Hajer's (2005c) paper, '*Setting the stage: A dramaturgy of deliberation*' provides as excellent case study to illustrate the application of these concepts. This case study examines the political debates over what to do with Hoeksche Ward, a major island in the Netherlands that has strategic importance for both industry and nature conservation. The initial plan for the island was referred to the as the 'area-orientated sketch' and can be seen as the main script because it brought together all the stakeholders, such as municipal staff, general public, AIR Southbound, and consultants. In this initial script, the policy process was staged to be largely technocratic with the municipal officials scripted as the dominant role-players. In this setting, the general public remained relatively passive. However, the staging of the policy process changed when a social movement, AIR Southbound intervened in the early stages of the process (Hajer's 2005c). The staging of the process changed because AIR Southbound insisted that the policy process needed to be more deliberative and that all the role players should have an opportunity to be involved. Municipal officials were subsequently replaced by representatives of AIR Southbound, such as architects and consultants, as the dominant role players. These representatives were able to mobilise the general public during meetings using several props, such as slide shows and maps. AIR used a site visit by several experts such as architects, politicians, and anthropologists, as a performance in which to decide how they should move on and to set the stage for future discussions (Hajer's 2005c). However, a positive unintended consequence emerged as a result of this performance. The local community which was relatively

passive up to that point, outraged by their exclusion from the performance, became mobilised and began to actively participate in the project.

This example illustrates how the four concepts of the performative dimension of policy making, namely scripting, staging, setting, and performance, shape the policy process. This dimension influences the policy process by determining which discourses are produced, reproduced, and transformed. There are currently several environmental discourses which dominate political debates at all levels; global, national, and local. The following section outlines several dominant environmental discourses internationally and in South Africa.

2.3.4 Environmental Discourses

The next section provides a broad overview of the dominant environmental discourses which provide an understanding of the discourses which this research aims to uncover. This broad overview is based on the environmental discourse typology of Dryzek (1997) and Bond (1999). Dryzek's (1997) typology consists of four global environmental discourses; 'survivalism', 'environmental problem solving', 'sustainability', and 'green radicalism'. Dryzek (1997) maintains that these discourses emerged in response to the long standing and dominant discourse of 'industrialism'. The 'industrialism' discourse is characterised by an overarching commitment to growth in terms of goods and services and the material well-being that growth brings. The discourses are classified in terms of whether they are reformist[1] or radical[2], and prosaic[3] or imaginative[4]. Bond's (1999) typology consists of three South African environmental discourses which emerged post 1994. These discourses are 'orthodox economic growth', 'ecological modernisation', and 'environmental justice'. The structure of this section is based on the typology of Dryzek (1997) and integrates the environmental discourses of Bond (1999) within the appropriate global environmental discourse.

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[1] Reformist refers to environmental discourses which support reformative responses to the 'industrialism' discourse
[2] Radical refers to environmental discourses which support radical responses to the 'industrialism' discourse
[3] Prosaic refers to environmental discourses which accept the political-economy set by the 'industrialism' discourse as given and are limited to responses which do not change the *status quo*
[4] Imaginative refers to environmental discourses which do not accept the political-economy set by the 'industrialism' discourse as given and support a transformation of the *status quo*

Survivalism

The 'survivalism' discourse emerged in the 1970s and this movement was led by the Club of Rome (Dryzek 1997). This organisation recognised that the earth has a finite carrying capacity and that the current and continued rate of economic and population growth will eventually reach this limit. This limit refers to the ability of earth's ecosystems to support human and agricultural activities. This discourse is characterised as being radical because it supports a complete redistribution of power within the political-economy and a reorientation away from the assumption of perpetual economic growth (Dryzek 1997). The main assumption of this discourse is that there is a hierarchy of control which is based on expertise and or virtue. The elites are seen as choosing and operating the national political-economy which is based on the aspiration of maximising growth. However, this discourse is classified as being prosaic because it relies on solutions to environmental problems which are controlled by the existing hierarchal system as it includes the state, scientists, and the elite (Dryzek 1997).

Environmental Problem Solving

Dryzek (1997) argues that the 'environmental problem solving' discourse emerged in response to the conflict between the 'survivalism' discourse and the promethean principles of economic growth that drive the 'industrialism' discourse. In place of the radical changes which the 'survivalism' discourse supports, the 'environmental problem solving' discourse favours human problem solving devices. The 'environmental problem solving' discourse closely resembles the 'orthodox economic growth' discourse of Bond (1999). This is because both the discourses draw strongly on rationalist and promethean ideologies which gained global dominance in the 1980s and 1990s (Hallowes and Butler 2002; Dryzek 1997). These ideologies emerged as a result of a restructuring of the global economy and shift towards neoliberalisation. This is the reason that the 'environmental problem solving' discourse focuses on maximising the gross domestic product of a country and gives very little consideration to the environment.

The 'environmental problem solving' discourse is characterised as prosaic because it accepts the current *status quo* of industrialisation as given. In contrast to the 'survivalism' discourse, the 'environmental problem solving' discourse is characterised as being reformist because it supports

minor structuralist adjustments to cope with environmental problems, such as changes in public policy (Dryzek 1997). However, there is a conflict within this discourse over which strategies are considered more legitimate. There is conflict between strategies which support greater state regulation and strategies which support market-based responses to environmental issues.

Proponents of greater state regulation are driven by an 'administration rationalism' discourse. This discourse falls within the umbrella of the 'environmental problem solving' discourse (Dryzek 1997). The main assumption of this discourse is that environmental problems are complex and that decision making should be left to the state and scientists within a bureaucratic structure. The aim of this discourse is to organise scientific and technical expertise into a bureaucratic hierarchy that serves the state. Therefore, decision making is not about democracy, but rational management, which is informed by the best available expertise (Dryzek 1997).

Proponents of market-based approaches to environmental problem solving are largely driven by a discourse of 'economic rationalism' (Dryzek 1997). This discourse also falls with the umbrella of the 'environmental problem solving' discourses. The aim of this discourse is to rationally deploy market mechanisms to support economic growth and effectively distribute the costs and benefits of social and economic development (Bond 1999). In contrast to an 'administration rationalism' discourse, the 'economic rationalism' discourse supports minimal state intervention in market mechanisms (Dryzek 1997). This discourse assumes that the environment is made up of assets which can be rearranged to meet our needs and market mechanisms will stimulate solutions to environmental problems (Bond 2000; 1999). This discourse also recognises that markets do not always exist for environmental goods and services and that in some cases markets need to be created and managed. The failure of market mechanisms to account for negative environmental externalities and to accurately assign value to environmental resources is one of the greatest criticisms of this discourse (Hallowes and Butler 2002).

Sustainability

The 'sustainability' discourse emerged in the 1970s in response to the conflict between the limits to growth claims of the 'survivalism' discourse and the denial of limits to growth claims of the 'industrialism' discourse. In contrast to the 'environmental problem solving' discourse which

supports a prosaic approach to the conflict, the 'sustainability' approach supports an imaginative approach. The 'sustainability' discourse does not seek to mitigate the conflict between environmental protection and economic development, but to dissolve the conflict. The central aim of sustainability is to maintain the equilibrium between resource use and resource availability (Baker *et al*. 1999; Haque 1999; Lafferty 1999; Pearce 1993). In contrast to the 'green radicalism' discourse, the 'sustainability' discourse supports a reformist approach to the 'industrialism' discourse. The 'sustainability' discourse does not support a radical reform of society, but effective action in response to environmental problems. This discourse is very similar to the 'environmental problem solving' discourse in that it accepts the industrial society as given, but supports a reform of the current political economy.

The 'sustainable development' discourse emerged from the 'sustainability' discourse in the 1980s and gained global dominance following the 1987 Bruntland Report and 1992 United Nations Conference on Environment and Development (Hallowes and Butler 2002; Dryzek 1997). In contrast to the 'sustainability' discourse, the 'sustainable development' discourse integrates various additional environmental issues, such as environmental protection, economic growth, social and economic development, and intergenerational equity (Dryzek 1997). These environmental issues are reflected in the Bruntland Report which defines sustainable development as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs" (WCED 1987: 8; Dryzek 1997).

The Bruntland definition highlights four core principles of sustainable development (Sowman 2002). Firstly, sustainable development needs to satisfy basic human needs and raise the living standards of the current generation. Secondly, sustainable development needs to ensure that future generations are able to meet their needs by avoiding the accumulation of uncompensated future costs, such as resource depletion (Sowman 2002). Thirdly, sustainable development needs to ensure that biodiversity and ecological integrity are conserved. Sustainable development does not seek radical restructuring of the industrial society, but a shift in emphasis and inclusion of environmental considerations in political agendas (Pearce 1993). This shift is based on the assumption that development should balance competing biophysical, economic, social, and cultural interests (Baker *et al*. 1999; Haque 1999; Dryzek 1997; Pearce 1993). Lastly, sustainable development supports democracy and the participation of civil society in environmental decisions that impact on them.

Baker *et al*. (1999) argues that the multi-dimensional nature and many interpretations of sustainable development can be classified in terms of a ladder. The first step of the ladder is the 'treadmill' approach which dominated policy making up till the 1980s. In the treadmill approach, economic growth is based on unhindered development with no consideration of environmental consequences. 'Weak' sustainable development attempts to integrate environmental concerns into economic growth. These environmental considerations are generally integrated into policy in terms of economic efficiency. However, the environment is often valued in monetary terms and often excludes social or cultural values. In 'strong' sustainable development, environmental protection is a pre-condition of economic development (Baker *et al*. 1999). The aim is to maintain or improve environmental assets, focussing on qualitative growth instead of quantitative growth. Strong sustainable development is achieved through various initiatives, such as green taxes, pollution charges and permits, subsidies or changing behaviour through education. The final ladder is the 'Ideal Model' (Baker *et al*. 1999) or ecological approach which attempts to bring about structural change within society. This approach aims to bring about a radical change in humanity's attitude towards nature and measures this change in quality of life and not standard of living.

Despite the popularity of the 'sustainable development' discourse, Dryzek (1997) argues that it will fail for two reasons. Firstly, the effectiveness of the discourse will be limited if it continues to run parallel to more dominant economic discourses supported by international institutions, such as the General Agreement on Trade and Tariffs (GATT), International Monetary Fund (IMF), and World Bank (Dryzek 1997). Secondly, although vagueness is one of the strengths of sustainable development because it allows competing parties to generally reach some sort of consensus, there is no shared consensus on what to do with the political-economy (Dryzek 1997; Richardson 1997).

The discourse of 'ecological modernisation' also emerged from the 'sustainability' discourse and was first noted by social scientists in Germany the 1980s (Dryzek 1997). The 'ecological modernisation' also gained popularity internationally and in South Africa (Oelofse *et al*. 2006; Bond 1999). This discourse is increasingly being used within policy analysis to describe the recent changes in environmental policy and politics (Buttel 2000; Christoff 1996). In contrast to the 'sustainable development' discourse, ecological modernisation does not attempt to dissolve the conflict between environmental and economic interests, but emphasises these competing interests are complimentary and mutually reinforcing (Dryzek 1997). Ecological modernisation also differs from sustainable development because it is more precise on what strategies to follow in terms of the

political-economy (Dryzek 1997). The aim of ecological modernisation is to restructure the political-economy along environmentally sensitive lines. This is the reason that is often described as 'economising the ecology' or 'ecologising the economy' (Christoff 1996).

There are three assumptions of the 'ecological modernisation' discourse. Firstly, ecological modernisation assumes that environmental problems are the result of structural and efficiency problems (Oelofse *et al*. 2006; Dryzek 1997). This discourse does not seek the complete transformation of the current political-economy, but the transformation of current environmental practices, discourses, and institutions (Christoff 1996). This discourse supports a modernist and technical approach which uses the language of business to transform the environmental sensitivity of the political-economy. Ecological modernisation appeals to business and policy makers because it emphasises the environmental and economic benefits of increased resource efficiency and waste minimisation (Christoff 1996). Ecological modernisation attempts to increase the environmental efficiency of the economy by reducing the rate of environmental damage per output (Hills 2005).

Secondly, ecological modernisation assumes that science plays a dominant role in the anticipation and prevention of environmental impacts (Oelofse *et al*. 2006). Although the discourse supports practices, such as the valuation of natural resources, the use of eco-taxes, re-organising production, and improvements in processing, prevention is still seen as the preferred option (Bond 1999; Christoff 1996).

Thirdly, ecological modernisation assumes that the state should play a dominant role in providing an effective policy and regulatory framework for environmental protection (Oelofse *et al*. 2006). This is in contrast to the 'sustainable development' discourse which supports responses at the local and international level and de-emphasises the importance of the national level (Dryzek 1997). The 'ecological modernisation' discourse encourages state intervention in dealing with environmental issues because it recognises that market failure does occur and that market mechanisms, such as 'the invisible hand', take time (Dryzek 1997). Greater state intervention is not only seen as necessary, but desirable as well (Bond 1999). Ecological modernisation therefore supports cooperation between the state, business, and moderate environmentalists in reorganising the political-economy. This may be the reason that countries with a strong corporate system, such as Germany, Japan, Norway and the Netherlands, have the most successful environmental policies (Dryzek 1997).

Ecological modernisation, like sustainable development, should be seen in terms of a continuum (Christoff 1996). The continuum ranges from weak ecological modernisation to strong ecological modernisation. In 'weak' or 'false' ecological modernisation, environmental policies and decisions remain largely economic, technological, technocratic[5], unitary, instrumental, and on a national scale (Oelofse *et al*. 2006; Dryzek 1997; Christoff 1996). Hajer (1995) argues that a weak 'ecological modernisation' discourse may actually dilute the ability of the state to bring about environmental reforms. This is because ecological modernisation obscures the degree to which economic growth, growth in consumption, and increases in capital-intensive technology compromise the ability of the state to protect the environment. In contrast, 'strong' ecological modernisation supports environmental policies which are ecologically based, institutional, communicative, deliberative, diverse, and international in scale (Oelofse *et al*. 2006; Dryzek 1997; Christoff 1996). Ecological modernisation is seen as being more reflexive because the state and business have to justify and be accountable for the environmental decisions and actions that they take (Hajer 1995).

However, Christoff (1996) argues that these weak and strong features of ecological modernisation should not be seen as being mutually exclusive as some weak features are necessary in order to achieve stronger features of ecological modernisation. This is the reason that developing countries should be hesitant of adopting the developed world's version of ecological modernisation because there are vast differences in their contexts and path of progress. This is because the effectiveness of ecological modernisation is dependant on the availability of advanced technology, capital, democracy, and capacity (Oelofse *et al*. 2006). Ecological modernisation in developed countries is based on depleted environmental resources, while much of the developing world is yet to exploit their natural resources in order to achieve traditional forms of economic growth. From this perspective, ecological modernisation can be seen as the apex of the traditional path of economic growth. Christoff (1996) argues that developing countries should not have to follow the same route of destruction and exploitation in order to reach the apex of the path and ecological modernisation. In South Africa, environmental management is currently dominated by an ecological modernisation discourse which supports technical solutions to environmental problems (Oelofse *et al*. 2006). This

[5] Technocratic refers to a positivist policy process which lacks democratic quality as it is closed to the general public. Decision making is therefore top down and dominated by the state, experts, and the elite because of the assumption that environmental problems are to complex for the general public to understand and that the public cannot meaningfully contribute to the body of scientific knowledge (Refer to section 2.3.4 on 'administrative rationalism').

discourse supports solutions which are rational, objective, and the responsibility of the state and experts. However, a parallel ecological modernisation discourse is also emerging which supports greater participation and equitable policy processes. This discourse encourages greater deliberation over solutions to environmental problems.

Green Radicalism

The 'green radicalism' discourse emerged as the global environmental discourse furthest from the 'industrialism' discourse. This is because the discourse is both radical and imaginative (Dryzek 1997). This discourse closely resembles the final tier of the sustainable development ladder which is the ecological approach. Both approaches support a radical change in society's attitude towards nature and focuses on quality of life rather than the standard of living (Baker *et al*. 1999). Although there are several ideologies, parties, and groups which support this movement, two strands are evident (Dryzek 1997). The first strand rejects the core principles of scientific knowledge and technology, and seeks to change the way individuals approach and experience the world in terms of nature. The second strand also rejects the way modern science and technology leads to environmental destruction, but supports aspects of modernity, such equality, rights, open dialogue, and questioning established practices.

One of the varieties that fall within the second strand is the 'environmental justice' discourse. Bond (1999) argues that the 'environmental justice' discourse gained popularity in South Africa because it is one of the core imperatives of the new democratic government and in response to the environmental injustices and inequality of apartheid. The aim of the 'environmental justice' discourse is to integrate environmental issues into broader institutional frameworks of human rights and democratic accountability (McDonald 2002). This discourse is characterised as a rights or value based approach (Hallowes and Butler 2002; Bond 1999). The 'environmental justice' discourse is mostly anthropocentric as it focuses on the 'brown issues' or basic needs instead of the 'green issues' often associated with environmental movements. This discourse therefore views environmental problems from a socio-political context (Khan 2002). This right based, anthropocentric focus is reflected in the Constitution of South Africa (Act 106 of 1996) which states that every South African has the fundamental right to an environment that is not harmful to their health (RSA 1996). This discourse also focuses on justice or ways and means to rectify the wrongs

of the past and to avoid them in the future (Hallowes and Butler 2002; McDonald 2002; Low and Gleason 1998). The emphasis is on individuals and communities that are excluded from the benefits of development and carrying the costs or negative externalities (Hallowes and Butler 2002). The principles of environmental justice link closely to the values of strong sustainability and ecological modernisation. These values include increasing the quality of life of every person and ensuring that policy and decision making processes include the individuals and communities that they affect.

In order to understand how discourse frames the policy process, the analysis needs to focus on the actors involved in policy making. The following section discusses the dominant actors which are involved in KwaDukuza and Rustenburg Strategic Environmental Assessment (SEA) policy processes.

2.4 Actors in Environmental Policy Making

This section discusses the dominant actors involved in the environmental policy process. The actors are government, environmental consultants, and the general public. This section describes the nature, core imperatives, and structure of the modern state. Section 2.4.2 discusses environmental consultants and their importance in the environmental policy process. Section 2.4.3 presents the general public as key stakeholders and describes the various levels of their involvement in the policy process.

2.4.1 The Modern State

The modern state can be seen as one of the most significant developments of the twentieth century (Axtmann 2004; Short 1993). Dryzek *et al*. (2003: 12) argues that the modern state is "composed of a set of individuals or organisations legally authorised to make binding decisions for a society within a particular territory". This definition highlights three important aspects of the state. Firstly, the modern state has a defined territory and society. Secondly, it has to make legally binding decisions for society based on a set of core imperatives. Thirdly, the state has a defined structure which consists of individuals, organisations, and institutions.

The concept of the modern state replaced the fragmented and contested territories of 'pre-modern' Europe into single, centralised states (Axtmann 2004). This created 'territorial states' in which the government of that particular state had authority over the people and resources which fell within the territory it controlled. The concept of the 'nation state' emerged in the late nineteenth century in response to local ethnographic and cultural diversity within territorial states. Nationalism was used as a tool to overcome local diversity and to produce standardised citizens whose loyalty lay with the state. However, due to multiple forces, such as globalisation, many western countries, such as the United States of America, began to experience the erosion of the nation state and nationalism (Axtmann 2004). Within these new increasingly multi-cultural societies, the state had to secure its continuation and legitimacy through the fulfilment of a number of imperatives. Four core imperatives are identified from the literature. These imperatives include survival, domestic order, economic growth, and state legitimacy (Axtmann 2004; Dryzek *et al*. 2003; Offe 1996; Skocpol 1979).

The imperative of survival refers to the territorial state protecting its border from external conflict (Axtmann 2004; Dryzek *et al*. 2003; Offe 1996; Skocpol 1979). The imperative of domestic order refers to the territorial state managing internal conflict within its border. The imperative of economic growth consists of two aspects. The need to extract all the resources (human and natural) within the states territory and the need to create favourable trade conditions to attract foreign and local investment. The imperative of state legitimacy emerged from the imperative of domestic order because the state needs the support of civil society to manage internal conflict (Dryzek 1996; Skocpol 1979). The state is only able to maintain the support of civil society by pursuing policies that please the majority of society (Rosenau 1997). This is the reason that the imperatives of minority groups, such as environmentalists, will always be overshadowed by the core state imperative of economic growth.

However, the state is also fragmented as individuals and organisations within it do not always pursue the same imperatives or value them in the same way. This often creates conflict between the imperatives and a blurring of which imperatives are of greater importance within the state (Dryzek *et al*. 2003). The theoretical structure of the state can be used to illustrate why particular imperatives are considered to be central and others as peripheral. The structure of the modern state in relation to policy making can be described using two concepts; the 'core and periphery' and 'imprisoned and unimprisoned policy-making' (Dryzek *et al*. 2003).

Dryzek *et al*. (2003) uses the concept of the core and periphery to explain how and why the state functions. The core refers to the zone of necessity were the four core imperatives; survival, domestic order, economic growth, and state legitimacy are located. Although public officials value the core imperatives differently, the core is the only zone in which sectoral preferences are overridden and the policies of the state seen as coordinated and consistent. In contrast, the periphery of the state is far more indeterminate in terms of policy imperatives. This is the zone in which there is greater deliberation and conflict over how imperatives are valued. This periphery is also the zone upon which civil society and social movements, such as environmental movements, have a greater influence on policy decisions. The core and periphery of the state relates closely to what Linbolm (1982 cited in Dryzek *et al*. 2003) refers to as 'imprisoned' and 'unimprisoned' policy making. In imprisoned policy making, preference is given to particular imperatives, such as economic growth, irrespective of the desires of public officials. However, this does not mean that there is no flexibility within the core as there is always pressure from competing imperatives and changes in the importance of imperatives. In contrast to imprisoned policy making, in unimprisoned policy making there is far more conflict and compromise over imperatives. This is because the process is far more open-ended and strongly influenced by deliberation over competing interests.

The modern state therefore has a defined territory and social contract with its citizens to provide several core imperatives. The core imperatives and the structure of the state determine the extent that environmental issues and non-state actors influence environmental policy processes. The following section focuses on environmental consultants as non-state actors which play an important role in the environmental policy process.

2.4.2 Environmental Consultants

Environmental consultants are a product of the transition that is taking place in the political-economy. The traditional political-economy is shifting away industrial societies dominated by activities, such as manufacturing, to knowledge-based societies characterised by higher standards of education and intelligent organisations (Evers and Menkhoff 2004). Some of the characteristics of a knowledge-based society are the replacement of labour and capital with knowledge, the creation of a culture of knowledge production, and the removal of the physical barriers of time and space because information can now be exchanged in real time (Britz *et al*. 2006).

Although environmental consultants are considered to be non-state actors, they are often not associated with other environmental movements and non-government organisations (NGOs) because they pursue profit (Chandler 2000). This creates conflict between environmental consultants and other non-profit individuals and organisation because there is the assumption that consultants are motivated by self interest and closely associated with the elite. This is the reason that Evers and Menkoff (2004: 126) define environmental consultants as "an expert who acquires, packages, and sells specific and confidential knowledge for a fee with the expectation that his knowledge is applied and acted upon". There are three reasons that environmental consultants have become important in environmental policy processes.

Firstly, from an economic perspective, while the production of other goods and services experience the law of diminishing marginal returns, consultants experience rising marginal utility (Evers and Menkoff 2004). Perloff (2001: 153) defines the law of diminishing marginal returns as "if a firm keeps increasing input, holding all other inputs and technology constant, the corresponding increases in output will become smaller eventually". Consultants do not experience diminishing marginal return because the more they know the more valuable they become. As knowledge is needed in order to utilise the information effectively, the more knowledgeable the individual, the more effective the way in which the information is used (Evers and Menkoff 2004). Knowledge is seen as being individualistic because only individuals can know and what they know is influenced by their perception, memory, and experience (Metcalfe and Ramlogan 2005; Liang 2004).

Although knowledge is individualistic, the sharing of knowledge and the creation of common understanding is only possible through social processes and institutions (Metcalfe and Ramlogan 2005). This is because institutions create a connection between knowledge and common understanding by storing and communicating information through mediums, such as language, and by establishing the rules and standards regarding the creation and use of knowledge. However, understanding cannot be seen as being entirely deterministic because it involves choice, judgment and creativity, which creates the scope for dispute, and contestation of ideas. Hayek (1945) argues that while knowledge is individualistic, it is also dependant on local circumstances of 'time and place'. As knowledge is time and place specific, it creates opportunities for environmental consultants who are familiar with local circumstances and able to utilize local resources available effectively.

Secondly, environmental consultants often employ several mechanisms to increase the demand for their services and the clients' satisfaction with their products. Environmental consultants often package their knowledge using high quality graphics, slide shows, and a special language or discourse to increase the value of their product. This convinces the client that they have purchased a valuable and legitimate product (Evers and Menkoff 2004). Consultants also incorporate contemporary theories and concepts into their products to convince the client that the product is valid and up-to-date. However, there is much literature which documents failed consultancies between the client and external consultants (Gable 1996). Often the reason for this situation is the poor appreciation by both the client and the consultant of the clients' true goals for the project and how to assess the progress towards those goals. This is because consultants often assume that it is the responsibility of the client to specify the goals of the project and their responsibility is to deliver the report and make recommendations based on those goals. Gable (1996) argues that failed consultancies also occur because clients do not only base their level of satisfaction with the consultation on the outcomes, but the process itself.

Thirdly, the state often seeks consultation because there is a competence deficiency or lack of necessary skills to solve particular problems. This situation may also arise when individuals are promoted to a position beyond their talents or competence because of a lack of suitable applicants (Blake and Mouton 1990). In these situations, consultants are often seen as the driving force in environmental policy processes because they play such an influential role and their ability to solve complex environmental issues and problems (Evers and Menkoff 2004). Consultants are also able to play an important catalytic role within policy making processes because they can be seen as being independent of the state or as external observers (Evers and Menkoff 2004). In this role, consultants are able to introduce new ways of thinking, framing of problems, and discourses into an organisation. However, public officials also use environmental consultants to legitimate political action by the offloading the accountability and responsibility from the decision makers (Evers and Menkoff 2004; Blake and Mouton 1990). This creates imbalances in the policy making process because accountability has been shifted to the environmental consultants for decisions that they have informed, but not made.

The lack of competency and skills within African states is one of the reasons that Britz *et al*. (2006) argue that the development of human intellectual capital, through education, training, research, and development, is an essential element of a knowledge-based society. This is because educated people

are able to adapt to new situations and use information more effectively. However, developing countries, such as South Africa, are experiencing what is referred to as the 'brain drain' which is the movement of its scientists and researchers or intellectual capital to the developed world (Britz *et al*. 2006). This unique situation undermines that ability of developing countries to expand their human intellectual capital and shift towards being a knowledge society.

Britz *et al*. (2006) argue that the general public are also important in environmental policy processes. This is because higher levels of education and presence of intelligent organisations, such as environmental consulting firms, have allowed the general public to question environmental policies and make government accountable for the decisions that they make. The following section focuses on their role in environmental policy making.

2.4.3 Key Stakeholders

The general public can be seen as constituting the third or voluntary sector of environmental policy making (Chandler 2000). This sector, especially in developing countries, is often described as being in opposition to the state because they oppose the environmental impacts of the state's economic growth imperative. This research defines the general public as key stakeholders for two reasons. Firstly, the term 'public' gives the impression that the general public is a homogenous group that shares the same opinions and interests (DEAT 2002). In contrast, the term 'stakeholder' reflects the diversity and conflicting interests of the general public. Secondly, the term 'stakeholder' implies that the individuals and organisations which are involved in the policy process have a stake in the project and something to contribute (DEAT 2002).

The increase in the popularity of public participation internationally and in South Africa is in response to two developments in environmental politics. Firstly, the failure of the command and control or regulation model to incorporate local knowledge, agendas, and needs and concerns through public participation into policy making (Bäckstrand 2003). There is a growing recognition that key stakeholders need to be included in the policy making processes which affect them because they can contribute to the identification of key issues and possible solutions (Bäckstrand 2003; DEAT 2002). This strengthens the capacity and expertise of the actors involved in the policy process and deepens its democratic quality. Secondly, the increase in the 'politicisation' of science,

which refers to the excessive reliance of the state on non-state experts, such as environmental consultants, for justifying and making decisions (Bäckstrand 2003). This is because the use of non-state actors adds credibility and legitimacy to environmental policies. There is a growing recognition that involving key stakeholders in the policy process can restore public trust in policy making processes as the processes appear to be more open-ended, efficient, and transparent.

Chouguill (1996) provides a ladder of community participation which is based on the ladder of citizen participation of Arnstein (1969). In the ladder, the level of community participation is conceptualised as being based on the extent of citizen power. Arnstein (1969: 216) defines this power as the "redistribution of power that enables citizens, presently excluded from the political and economic processes, to be deliberately included in the future". Chouguill's (1996) ladder which is applied to developing countries is based on eight rungs; 'empowerment', 'partnership', 'conciliation', 'dissimulation', 'diplomacy', 'informing', 'conspiracy', and 'self-management'. The IEM Stakeholder Engagement Guidelines (2002) provide a similar ladder which is not based on citizen power, but what is termed the level of engagement. This ladder consists of six rungs; 'protest', 'inform', 'consult', 'involve', 'collaborate' and 'empower'. The following discussion uses the Guidelines as a framework for discussing levels of public participation and engagement.

The first two tiers of the ladder; 'protest' and 'inform' refer to a one-way engagement process in which either the state or key stakeholders dominate the interaction. The first rung; 'protest' refers to activities, such as protests and petitions, generally used by key stakeholders to target specific and visible issues (DEAT 2002). Protests generally reflect a complete breakdown in the relationship between key stakeholders and the state. 'Inform' refers to an engagement process where the state provides information to key stakeholders to inform them about a proposal, activity or decision (DEAT 2002; Chouguill 1996). There is no allowance made for feedback or negotiation in this top-down engagement process. Chouguill (1996) provides two additional rungs which refer to the manipulation, rejection, and neglect of environmental problems and public participation by the state. In the 'conspiracy' rung there is no public participation in the environmental policy process to disguise the state's ulterior motives. In the 'self-management' rung the state completely neglects environmental issues. In this situation, key stakeholders attempt to solve these environmental problems by themselves or in conjunction with other non-state actors, such as environmental consultants.

The final four tiers of the Guidelines refer to a two-way engagement process in which there is a variety of levels of interaction between government and key stakeholders. The rung, 'consultation' refers to the exchange of information between the state and key stakeholders. Key stakeholders are permitted to raise concerns and make comments concerning a proposal, activity or decision (DEAT 2002). Chouguill (1996) refers to this rung in terms of the 'dissimulation' and 'diplomacy' rungs because the state limits the level of stakeholder engagement to education about and gaining support for the project. 'Involvement' refers to an engagement process where key stakeholders and the state actively work together to ensure that the issues and concerns are reflected in the proposal, activity or decision (DEAT 2002). Chouguill (1996) refers to this rung as 'conciliation'. In this top down engagement process, the state determines solutions to environmental problems and these are ratified by key stakeholders. 'Collaboration' occurs when decision making is shared between key stakeholders and the state. Key stakeholders and the state explore each others differences and together develop a strategy to solve a particular environmental problem (DEAT 2002). Chouguill (1996) refers to this rung as 'partnership' because the state and key stakeholders agree to share decision making responsibilities and establish structures to institutionalise these arrangements. The final rung, 'empower' refers to an engagement process were the responsibility of decision making is transferred from the state onto the key stakeholders (DEAT 2002; Chouguill 1996). In this situation, all or the majority of the decision making power is given to stakeholders.

In order to understand the role of the state, environmental consultants, and key stakeholders in environmental policy making, the policy making process needs to be examined. The following section focuses on environmental policy processes and the changes taking place in environmental policy making.

2.5 Environmental Policy Making

The next section discusses environmental policy making and emerging challenges within the context of an ecological crisis. Section 2.5.1 discusses policy challenges that emerged as a result of the changes taking place in environmental policy making, internationally and in South Africa. Section 2.5.2 examines the environmental policy process and transformation of environmental policy making.

2.5.1 Environmental Policy Challenges

Dryzek (1997) argues that prior to the 1960s there was very little consideration for the impact of economic growth on the environment. Following this period, a growing number of environmental issues, such as pollution, loss of biodiversity, global climate change, and the depletion of natural resources, began to emerge within political debates. Dryzek (1997) and Hajer (1995) argue that one of the fundamental reasons for this shift in thinking is the photo of the earth taken from outer space in the 1970s. This image was seen as the symbol of the political effort to address global environmental problems as it conveys the fragility and finiteness of the earth, as well as our dependence on nature. The 1970s was characterised by an increase in scientific studies to determine the extent of environmental degradation. These studies revealed the consequences of environmental exploitation and irrationality of the current path of development during that period. Low and Gleeson (1998) argue that these studies highlighted that the particular development path of industrialisation would only lead to catastrophe.

Hajer and Wagenaar (2003) identified three challenges facing environmental policy making which have emerged in response to an ecological crisis. These challenges are the emergence of new political spaces, conditions of radical uncertainty, and the importance of difference in policy making.

Emergence of New Political Spaces

The first challenge facing contemporary environmental policy making is the emergence of new political spaces. These new political spaces emerged in response to issues and forces of modernity, such as globalisation, and brought about a fundamental shift in the conception of the modern state. Hajer and Wagenaar (2003) note that there has been a shift in vocabulary from terms such as the state, sovereignty, and participation to terms such as governance, policy networks, and deliberation. The first of these changes is the shift from the concept of a centralised government to the notion of decentralised governance. This change represents a shift away from government as the legally bound structure and formal authority which creates and implements policies to governance or the task of running government (Bingham *et al*. 2005; Hattingh and Seeliger. 2003). Governance differs

from government in that decision making power is shared and the inclusion or engagement with civil society is encouraged.

The restructuring from government to governance is associated with three processes; destatisation, denationalisation, and internalisation (Axtmann 2004; Macleod and Goodwin 1999). The processes of 'destatisation' are often associated with conventional conceptions of governance as it refers to the decline in the state's intervention in social and economic projects and the inclusion of civil society. This process can be seen as taking place over a range of scales and involves a blurring of boundaries between public and private, the transfer of tasks within and between institutions, and the redefinition of tasks themselves. All these processes open up political spaces for the inclusion of non-state actors, such as social movements, non-governmental organisations, and environmental consultants. 'Denationalisation' is closely associated with what Jessop (1997 cited in Axtmann 2004) refers to as the 'hollowing of the state'. The state is seen as being hollowed out because there is a continuous movement of power upwards to an international level, downwards to the local level, and sideways to non-state actors (Axtmann 2004; Offe 1996). The processes of 'internalisation' recognise the importance of the international or global context within which the state operates and the significant role that these international communities and networks play in policy making (Axtmann 2004; Macleod and Goodwin 1999). In this situation, global environmental problems, such as global warming, are internalised into local policy making through the exchange of ideas, goods, and people from abroad.

The importance of these governance processes in terms of environmental policy making is that they open up opportunities for non-state actors, such as environmental consultants, to enter policy making processes (Axtmann 2004; Rosenau 1997). Macleod and Goodwin (1999) argue that what makes governance work is not government itself, but the relationship between government and non-state actors. This is because effective governance relies on those actors who have access to the resources, whether physical, human or political, and the power to effectively use them, regardless if they are public or private.

The relationship between government and non-state actors with regard to environmental policy making can be seen as a shift away from traditional political hierarchies of decision making, such as the ladder, to decision making through policy networks. Karkkainen (2004) argues that traditional decision making hierarchies were largely based on the environmental regulation model that

emerged in the 1960s. Hajer (1995) refers to this model as the science-based policy making model. This model assumed that environmental problems were predictable and that with adequate information and expertise, policy makers should be able to formulate effective policies that will achieve the desired social and economic outcomes (Karkkainen 2004). This model also assumes that expert decision makers are able to identify key environmental problems, gather expert knowledge, and develop specific solutions to those problems.

However, state actors are beginning to recognise that the complexity of environmental problems often lies beyond the expertise and competence of policy and decision makers (Karkkainen 2004). This situation is compounded in developing countries were competence is often fragmented across several departments and different tasks, and diffused across the various tiers of government. To overcome these deficiencies, government is joining non-state actors through various relationships, such as collaboration and partnerships, to address these problems (Connick and Innes 2003). These relationships aim to pool, recombine, and deploy the various resources and competences of the multiple actors involved. Connick and Booher (2003) examined a collaborative group called the Sacramento Water Forum in the United States, which consisted of environmental organisations, business, local government, and agriculture sector. This group spent five years in a consensus building process to develop a strategy and procedures for managing the limited water supply in northern California's semi-desert.

Bulkeley (2005) and Cowell (2003) argue that often literature on environmental governance takes the concepts of space and time as given. This is because there is an assumption that there is an inherent cascade of decisions from international to national and from national to local. However, alternative or horizontal governance structures are emerging alongside and out of traditional territorial spaces and hierarchal scales (Bulkeley 2005). These emerging structures are often characterised in network terms, in which several actors and institutions operate simultaneously across multiple and overlapping scales (Hajer and Wagenaar 2003). These networks can be seen as open and unstable structures that are constantly expanding, adjusting, shifting and in some cases deteriorating. Within these networks, the state is no longer seen as a whole, but comprised of individual departments, each pursuing their own agendas and autonomy within the constraints of overarching government policies (Macleod and Goodwin 1999). Conventional scales or hierarchies of policy and decision making are therefore no longer seen as fixed, but scales which are continuously being redefined, contested, and restructured.

Although non-state actors have long influenced traditional policy making through consultation, advocacy and lobbying, there is still debate as to what extent these organisations, NGOs, and environmental consultants are part of the policy making process (Karkkainen 2004; Hajer and Wagenaar 2003). The function of non-state actors within these networks is to plug the gaps, such as incapacity or lack of expertise between spaces in the state, and to critique state environmental policies. However, in order for the state to meaningfully benefit from non-state actors in terms of continuous learning, these interactions cannot be a once-off advisory exercise (Karkkainen 2004). Macleod and Goodwin (1999) argue that these long lasting relationships can however also lead to a blurring of the conventional distinction which the regulation model makes between the state and non-state actors.

A consequence of the emergence of new political spaces for environmental policy processes is that policy making takes place in what Hajer (2006; 2005a) refers to as a state of 'institutional ambiguity'. Institutional ambiguity refers to the recognition that often policy solutions to complex environmental problems lie outside of the boundaries of conventional top-down political structures (Hajer 2006). In this context, the rules of policy making cannot be assumed and have to be established within the policy process itself. This is because each of the actors has their own ideas and assumptions about the rules of the process and there is no single constitution or set of rules against which actors can determine if and how legitimate particular decisions are.

Conditions of Radical Uncertainty

The second challenge that policy makers face is what Hajer and Wagenaar (2003) refer to as policy making under conditions of radical uncertainty. While traditional approaches to policy making rely on scientific knowledge and expertise to add legitimacy to policy, policy making within a network society recognises that policies and decisions are often made under conditions of radical uncertainty. Weale (1992 cited in Low and Gleeson 1998) argues that there is a realisation among interpretive policy analysts that environmental problems are often well beyond the scale, legislative experience, and policy making approaches of today's policy makers. There is a growing consensus that environmental problems cannot simply be explained in terms of cause and effect relationships. This is because they are highly complex due to their interconnectedness and multiple-dimensional nature (Dryzek 1997). This poses a challenge for actors to make effective decisions because the

more plausible problems and solutions there are, the more difficult it is to prove them right or wrong. In this situation, policy makers often have to make difficult or 'hard' decisions based on incomplete, fragmented or 'soft' information (Hajer 1995). Policy making therefore frames environmental problems as policy makers often have to create or define particular problems from these fragmented and contradictory statements (Hajer 1995; Laws and Reins 2003).

A consequence of institutional ambiguity and conditions of radical uncertainty in environmental policy making is that trust in environmental policies is being called into question (Hajer and Wagenaar 2003). One of the assumptions of the modern state is that civil society trusts the environmental policies because of the state's sovereignty and claims of legitimacy. However, within emerging policy networks, the state has to instil trust in its policies by formulating and implementing polices that have the support of civil society (Hajer and Wagenaar 2003). The state instils this trust through alternative policy making strategies, such as collaboration or partnerships, in which civil society is given the opportunity to contribute alternative and often conflicting opinion and knowledge.

The Importance of Difference in Policy Making

The third challenge facing policy makers is the increasing importance of difference in environmental politics (Hajer and Wagenaar 2003). As modern societies become more complex and multi-cultural, environmental problem-solving becomes more difficult. This is because the various groups may speak different languages or have conflicting interests and preferences.

Dryzek (1997) argues that there was a realisation in the 1980s that policy making is essentially a political debate because policy makers and key stakeholders frame environmental problems and their solutions in different ways due to their diverse backgrounds. This situation arises because all the actors involved draw on different systems of signification to make sense of what is happening around them or the significance of a particular environmental issue (Hajer 2006). These systems of signification include life styles, ideologies, and religious convictions. Hajer (2006) refers to this situation as 'multi-signification' because the systems of signification that policy makers draw on remain largely unclear to one another. In this situation, conflict over meanings and understandings abound and have to be negotiated within the policy process.

In environmental policy making, the way in which the environmental problem is approached depends largely on the balance between competing interests (Hajer 1995). These power struggles within political debates conceal what Hajer (1995) refers to as 'mobilisation bias.' This bias refers to policy makers' covert struggles over deeper cultural assumptions, the pursuit of particular interests, and the way in which they maintain their positioning with these political debates. This bias becomes evident during policy processes when policy makers support particular conflicts or arguments and actively suppress others. This is not an ideal situation because prioritising particular environmental problems, such as global climate change, often means that other issues, such as biodiversity loss, are marginalised (Hajer 1995). Policy making has therefore become largely discursive as environmental issues can be seen as socially constructed. The focus is no longer over whether there is an environmental crisis or if we should act, but the way in which policy makers interpret, make sense of, or frame the problem in order to work towards a plausible solution. Policy making should therefore be seen as an essentially interpretive activity in which policy makers judge, compare, combine, and act upon contradictory statements.

This raises the question of how policy making should be defined within the context of the shift to governance and policy network decision making processes. The following section discusses the environmental policy making process and changes taking place in the nature of environmental policy making.

2.5.2 What is Environmental Policy Making?

The traditional approach to environmental policy making consists of three phases; agenda setting, decision making, and implementation (Keeley and Scoones 2000). The assumption of this approach is that policy making is a linear process and competent policy makers identify problems, evaluate alternatives, take decisions, and implement the outcomes. There are several terms which describe this approach and include the regulation model (Karkkainen 2004), technocratic approach (Vigar and Healey 2002), and science-based policy making approach (Hajer 1995). All these approaches share the same assumption that policy making is a technical or rational exercise to identify the objectively 'right' answer to a given policy problem. In these approaches, policy makers use 'technical' knowledge of cause and effect to define the goals of policy and to develop policy

instruments (Vigar and Healey 2002). Solutions are therefore largely technical because the policies reflect the interests and perceptions of the expert groups which are generally involved.

Keeley and Scoones (2000) argue that this technocratic approach to policy making is criticised for being ineffective within the context of the shifting political spaces and conditions of radical uncertainty discussed in Section 2.5.1. This is because the policy process should not be seen as a linear process, but a diverse, diffuse, and complicated process. This is largely due to the diversity and competing interests of the actors involved in the policy process (Hajer and Wagenaar 2003; Dryzek 1997; Hajer 1995). Vigar and Healey (2002) argue that a deliberative approach to policy making which focuses on the way in which multiple stakeholders conceive of environmental problems and the diversity of value systems would be more appropriate in this context. This is because a deliberative approach uses reasoned dialogue and critical reflection to overcome the criticisms of narrow technocratic approaches. The advantage of a deliberative approach is that it highlights the interconnectedness of policy problems and can improve implementation as well. This is the reason that Hajer (1995: 22) defines policy making as "defining a set of socially acceptable solutions for well defined problems". Based on this definition, policy making has three regulatory tasks (Hajer 1995). Firstly, policy making needs to achieve discursive closure in which policy makers need to define the problem so that they can have a target to work towards. Secondly, policy making needs to regulate the social conflict which may arise over the definition and solutions for environmental problems through the deliberative process. Lastly, policy needs to achieve some form of problem closure in which the situation is remedied.

There has also been a shift in environmental policy making in South Africa in response the emergence of new political spaces, conditions of radical uncertainty, and the increase in the importance of difference. Prior to 1994, environmental policy making was largely centralised and focused on supply-side problems, such as building more dams to cope with increasing water demands (Kgomongoe *et al*. 2004; Hattingh *et al*. 2003: 2). The policy making approach was largely technocratic and excluded large portions of civil society (Rossouw and Wiseman 2004). If public participation did take place it was limited to a small group of experts or to inform and consult with key stakeholders. This is the reason that this approach is seen as exhibiting a weak sustainable development discourse. In contrast, environmental policy making has shifted towards decentralisation and demand-side problems since 1994 (Kgomongoe *et al*. 2004; Hattingh *et al*. (2003: 2). This is because policy making is less centralised, encourages meaningful public

participation, and focuses on demand side problems, such as over consumption (Rossouw and Wiseman 2004). This is the reason that the shift in policy making is associated with a strong sustainable development discourse.

2.7. Conclusion

Social constructivism provides the overarching philosophical framework for this research because it focuses on language and recognises that reality is socially constructed. Interpretive approaches, such as interpretive policy analysis, provide an appropriate theoretical framework and methodology for understanding language use and the meaning embedded in language. Discourse analysis is a specific interpretive approach which focuses on the ideas or concepts that are produced within particular settings and used to guide actors in the policy process. Hajer (2006; 2005a) provides a 'three-dimensional analytical model' which can be applied to understand how language and the performative setting of the policy process frames environmental policy making. The three dimensions of this model are the discursive, performative, and deliberative dimensions. This chapter has reviewed the first two dimensions and their associated concepts. The discursive dimension consists of three main concepts which are discourse, story lines, and policy vocabularies, while the performative dimension can be understood by examining the concepts of scripting, staging, setting, and performance.

There are several examples of dominant international environmental discourses, such as 'survivalism', 'environmental problem-solving', 'sustainability', and 'green radicalism'. There are also several examples of environmental discourses in South Africa, such as 'orthodox economic growth', 'ecological modernisation', and 'environmental justice'. It is important to understand these discourses as they structure the way in which actors define, interpret, and find solutions for environmental problems. In South African environmental policy making there are three main actors; the state, environmental consultants, and key stakeholders. Each of these actors has a defined role and responsibility in the environmental policy process. The aim of this study is to apply Hajer's (2006; 2005a) analytical model to the two case studies of the KwaDukuza and Rustenburg SEAs in order to understand the role of environmental consultants in municipal environmental decision making. The results of the application of this model are presented in Chapters five and six. It is important to understand the role and responsibilities of actors in the policy process because these

are currently changing as new deliberative approaches to policy making emerge. The emergence of these approaches is largely in response to the emergence of three challenges facing contemporary environmental policy making. These challenges are the emergence of new political spaces, conditions of radical uncertainty, and the importance of difference in the policy process. A consequence of these challenges is the opening up of political spaces for non-state actors, such as environmental consultants, and the redefinition of environmental policy making. Policy making is therefore not only about solving environmental problems, but resolving conflict over the competing interests of multiple actors.

CHAPTER 3: BACKGROUND

3.1. Introduction

Following the end of Apartheid in 1994, the South African government has experienced several fundamental structural changes. Some of the most significant changes have occurred at the local government level. This is because the local level is seen as an appropriate platform for the new government to initiate development, transformation, and effective service delivery policies (Lemon 2002). A consequence of the structural changes is the institutionalisation of several emerging environmental discourses, such as 'economic growth', 'ecological modernisation', and 'environmental justice' (Bond 1999). These discourses have resulted in significant changes in the way in which local government approaches environmental issues. These structural changes have also created several challenges, such as capacity constraints, for local government. A consequence of these challenges is a reliance on the private sector, such as environmental consultants, to effectively develop and implement environmental policies.

The aim of the research is use a discourse analysis of the KwaDukuza and Rustenburg SEAs to understand the role of environmental consultants in municipal environmental decision making. The research analyses two municipal Strategic Environmental Assessments (SEAs) as case studies to determine the extent that environmental consultants influence the policy processes which inform environmental decision making. The Rustenburg SEA (Phase 1 and Phase 2) and the KwaDukuza SEA were chosen as case studies because they are environmental policy making processes at the local level and environmental consultants were appointed to undertake all three SEAs. These case studies provide an appropriate context in which to interpret how consultants influence the SEA policy process through the language or discourses used and the performances that they engaged in.

Chapter 3 is divided into three sections. Section 3.2 focuses on the background of each case study. The section introduces the two study areas; the KwaDukuza Local Municipality and the Rustenburg Local Municipality, and discusses the reasons that both municipalities made the decision to undertake a SEA. The second section describes the developmental role and post-apartheid transformation of local government, national and local legislation, and the capacity challenges facing local government. Section 3.4 discusses how environmental issues are integrated into local

government. The section outlines approaches to integrating environmental considerations at the local government level, environmental management in South Africa, and environmental management tools, such as a SEA.

3.2. Study Area

This research uses two case studies; the Rustenburg SEA (Phase 1 and Phase 2) and the KwaDukuza SEA. Section 3.2 introduces the background of the municipalities in which these SEAs were undertaken. The section outlines each municipality's location, population demographics, economy, and urban structure. The reason that each municipality made the decision to undertake a SEA is also discussed.

3.2.1 Rustenburg Local Municipality

The Rustenburg Local Municipality is located in the eastern parts of the North West Province within the Bojanala District Municipality (RLM 2006). The Rustenburg Municipality is one of five municipalities that make up this District Municipality. The other municipalities which flank the Rustenburg Municipality are the Moses Kotane, Kgetlengrivier, Madibeng, and Mogale Municipalities.

The Rustenburg Municipality is approximately 3423.6 km^2 in extent, mostly rural in nature and has a total population of 395 540 people (RLM 2006). The municipality, especially the town of Rustenburg is located in close proximity to several environmentally sensitive areas, such as the Magaliesberg Protected Natural Environment and Kgaswane Mountain Reserve (Refer to Figure 3.1).

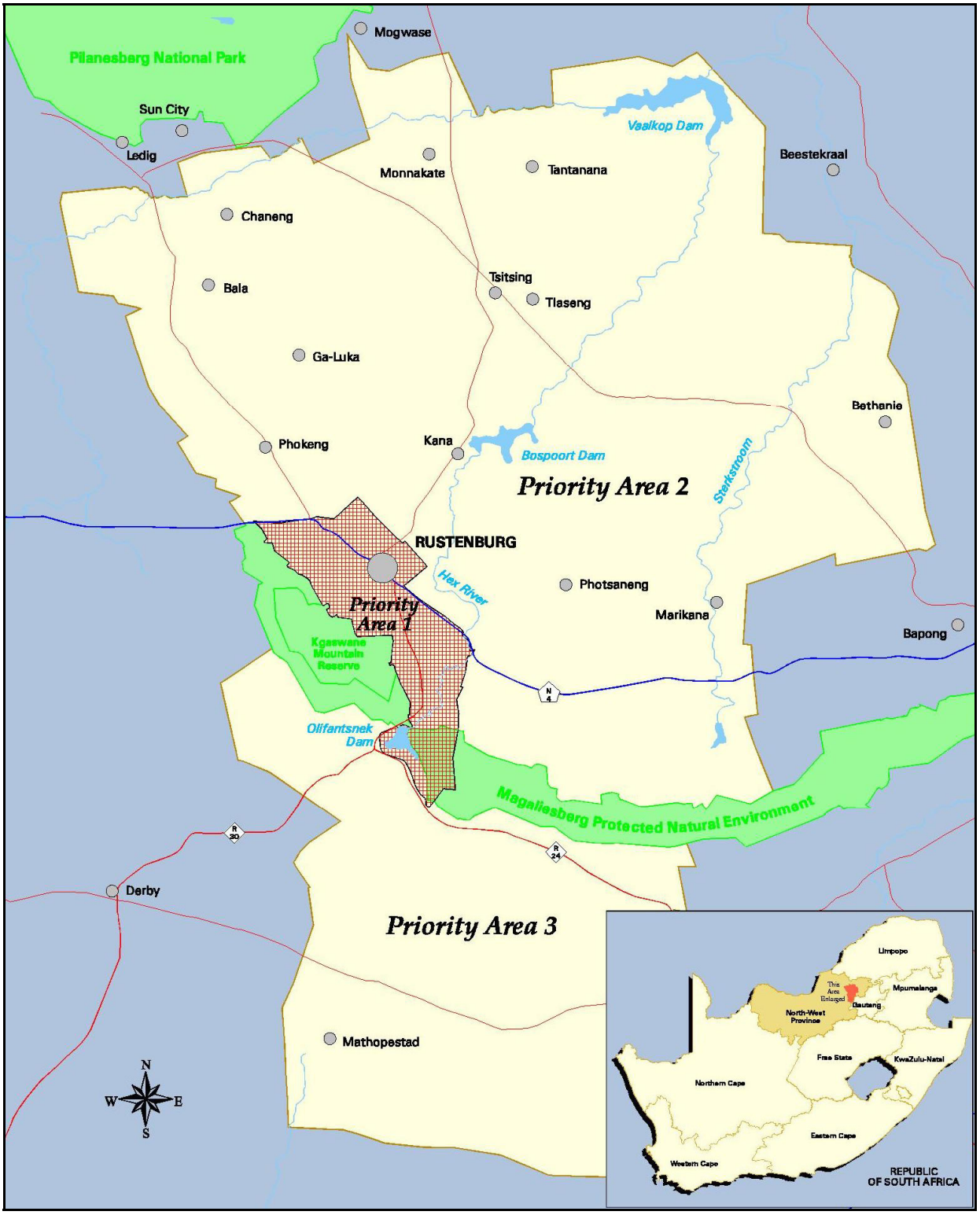

Figure 3.1: The Rustenburg Local Municipality and location of Priority Areas 1, 2 and 3 (RLM 2003)

The Rustenburg Municipality is currently experiencing high levels of development. The reason for the development boom is the growth in the mining sector and the platinum mines which are located on the outskirts of Rustenburg (NWPG 2004). Three of the world's largest platinum mines, namely Anglo Platinum, Impala Platinum and Lonmin, are located in the immediate vicinity of the town (RLM 2006). Rustenburg is considered one of the fastest growing urban areas in South Africa with an approximate growth rate of 6% between 1996 and 2002 (RLM 2006). The population in the Rustenburg Municipality increased from 311 000 to 395 000 between 1996 and 2001. The population growth has created an increased demand for housing, services, and work opportunities (NWPG 2004).

The increase in population and urban growth has had several impacts on the environment (RLM 2006; NWPG 2004). The impacts include decreasing air quality, increasing pressure on the boundaries of the Kgaswane Mountain Reserve and the Magaliesburg Protected Environment (Refer to Plate 3.1), and the loss of heritage resources and biodiversity (Refer to Plate 3.2).

Plate 3.1 Development on the fringes of the Kgaswane Mountain Reserve (RLM 2003: 21)

Plate 3.2 Biodiversity rich granite koppies in Rustenburg Municipality (RLM 2005: 49)

This is the reason that the Rustenburg Municipality and the North West Provincial Government (NWPG) made the decision to undertake a SEA. A SEA was chosen because it would provide a decision making support system to mitigate the impact of development on the environment (NWPG 2004). The Rustenburg Local Municipality SEA consists of three phases. This research only focused on the Priority Area 1 SEA and Priority Area 2 SEA as the Priority Area 3 SEA is only in the planning stages.

3.2.2 KwaDukuza Local Municipality

The KwaDukuza Local Municipality is located in the province of KwaZulu-Natal and within the Ilembe District Municipality (KLM 2006). The KwaDukuza Municipality is one of four local municipalities that make up the Ilembe District Municipality and is considered the district node and commercial centre of the district. The KwaDukuza Municipality is flanked by four municipalities, namely the eThekwini, Ndwedwe, Maphumulo and eNdondakusuka Municipalities. In 2001, the

permanent population of the municipality was 158 583, but this can increase to over 200 000 during the holiday season (KLM 2006).

KwaDukuza Municipality is approximately 630km^2 in extent, stretching roughly 50km along the coast and 14km inland (KLM 2006). The municipality stretches from the Tongaat River in the south to the Zinkwazi River in the north (Refer to Figure 3.2). The KwaDukuza Municipality consists of several small towns, such as Stanger, and a few clustered settlements. In the rural areas, the dominant land-use is commercial forestry and sugar cane. Development in urban areas is far less evenly spread (KLM 2006). The southern portions, in the vicinity of Ballito and Salt Rock are well developed and focused on providing services to the middle and high income holiday makers, while the northern regions are far less developed with the exception of a few settlements at Tinley Manor Beach, Blythedale Beach, and Zinkwazi Beach. The main economic activities include tourism, sugar, commercial forestry, paper and paper products (KLM 2006). However, holiday letting and the development of exclusive residential and golfing estates, such as the Zimbali Golf and Leisure Estate, are on the increase. The KwaDukuza Municipality is also experiencing high levels of development (Refer to Plate 3.3). The situation is set to continue because the Integrated Development Plan (IDP) reflects a strong commitment to further development (KLM 2006). The developments include industrial areas, such as the Business Ballito Park, tourist attractions, and up-market residential estate developments, such as the extension of the Zimbali Golf and Leisure Estate, Zimbali Lakes, and Simbithi Eco-Estate.

Plate 3.3: Development in the KwaDukuza Local Municipality (KLM 2007: 21)

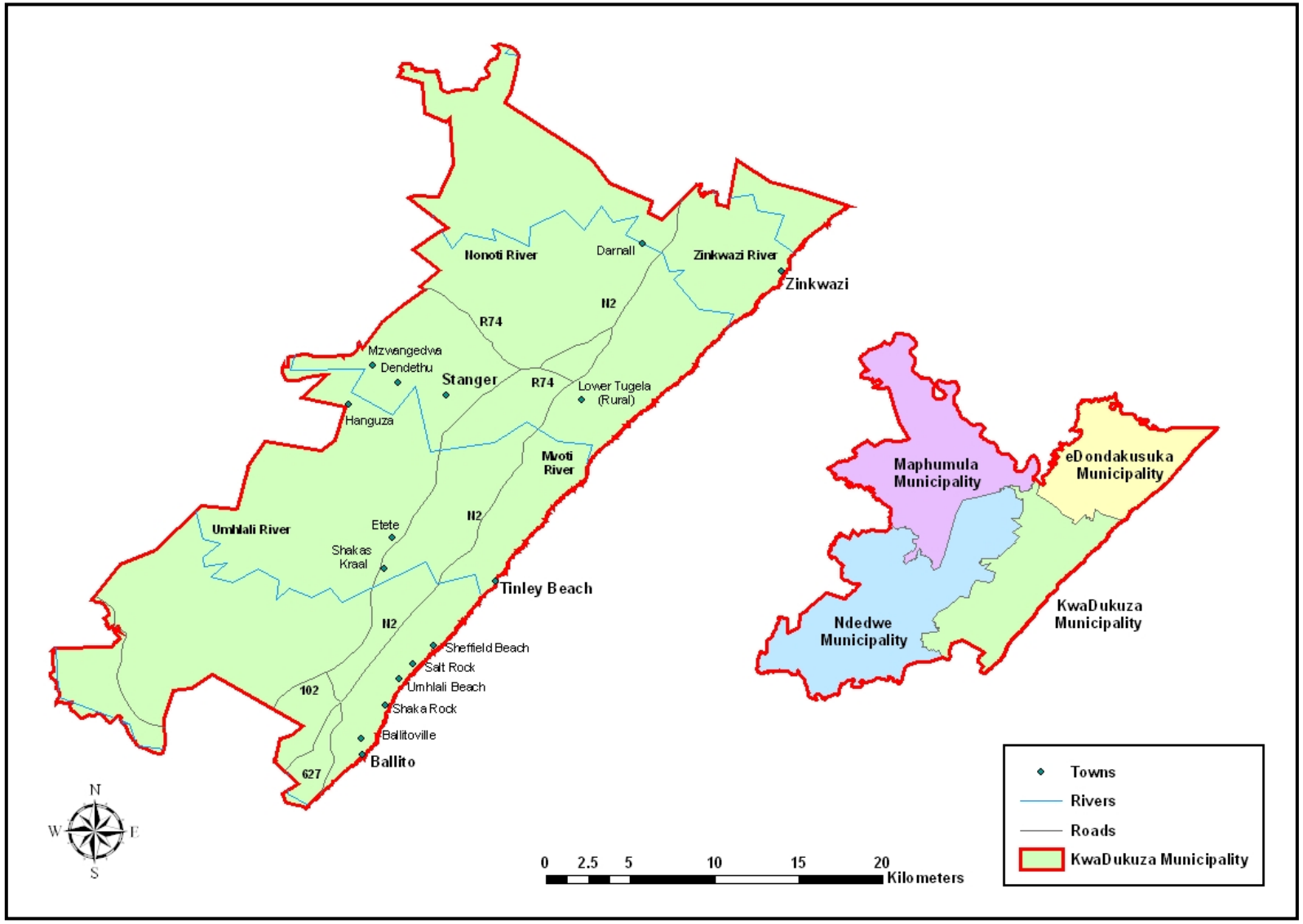

Figure 3.2: The KwaDukuza Local Municipality (Van Niekerk 2008)

The fast pace of the development in the municipality is placing strain on the natural environment (KLM 2006). The land use transformation of the coastline is increasing pressure on the biological and ecological processes of the area, as well as undermining its 'sense of place' as an attractive holiday destination (Tourism KZN 2005). This transformation can be seen in Figure 3.3, which shows the extent of land use transformation that has occurred on the KwaZulu-Natal coastline up till 2000. The areas shown in red and orange indicate that a large percentage of the coastline has undergone transformation from its natural state or is degraded in some way. This is in strong contrast to the interior which has remained relatively untouched by comparison.

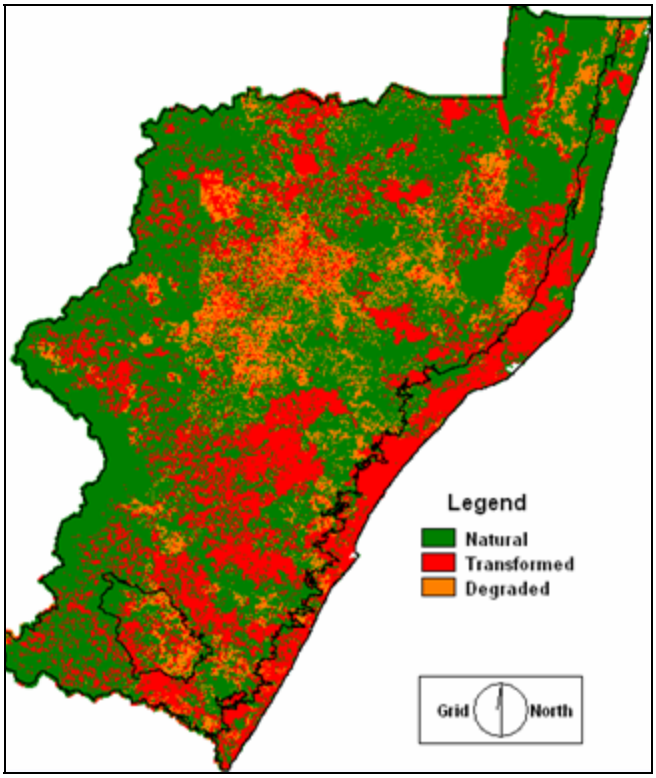

Figure 3.3: The land use transformation status of KZN in 2000 (Tourism KZN 2005: 4)

The KwaDukuza Municipality has realised that the current extent and rate of development is not sustainable in the future (Tourism KZN 2005). This is the reason that the municipality has introduced several initiatives to mitigate the impacts of development on the environment. A Coastal Working Group which operates on a regional scale was formed in order to integrate environmental concerns into the decision making processes of the coastal zone (KLM 2006). The municipality also maintains close and continuous ties with national and provincial environmental departments, such as the Department of Environment and Tourism (DEAT) and the Department of Agriculture and

Environmental Affairs (DAEA). The commissioning of a SEA is another environmental initiative of the KwaDukuza Municipality. The aim of the SEA is to provide an environmental decision framework for future development applications.

Both the KwaDukuza and Rustenburg Municipalities made the decision to undertake a SEA because it is an environmental management tool which can be used as a policy tool to improve environmental decision making. In order to understand municipal environmental decision making, the character of local government in South Africa needs to be examined. The following section examines the function of government at the local level in South Africa, relevant national and local legislation, and capacity challenges which affect municipal decision making processes.

3.3. Local Government

Section 3.3 focuses on the local government level in South Africa. The section discusses the relationship between local government, such as the KwaDukuza and Rustenburg Municipalities, and other spheres of government. The discussion includes the role and responsibilities of local government as an agent of development and transformation. The section also outlines the relevant legislation and capacity challenges which affect the local government and the KwaDukuza and Rustenburg Municipalities.

3.3.1 Spheres of Government

The Constitution of South Africa (Act 106 of 1996) specifies that government consists of three spheres (RSA 1996). These are national, provincial, and local governments. Although each sphere is seen as being distinctive, interdependent, and interrelated, the Constitution of South Africa (Act 106 of 1996) has assigned local government a considerable amount of autonomy (RSA 1998d). This is the reason that local government is often referred to as a 'sphere' of government as it is not a tier of a hierarchal institutional structure (Buthelezi and Dollery 2004). However, both Kotźe (2005) and Rossouw and Wiseman (2004) argue that the empowerment of all three spheres of government to enact their own legislation often leads to fragmentation and duplication of functions and legislation because there is poor communication between different spheres and departments.

The Constitution of South Africa (Act 106 of 1996) also specifies the roles and responsibilities of national and provincial government towards local government (Cloete 2002; RSA 1998d). National government is responsible for setting an overall strategic framework for the economic and social development of the nation. This framework includes strategies for developing and supporting municipal capacity building (RSA 1996). Provincial government is responsible for playing a strategic role in developing an overall vision and strategic framework for the province as a whole. The provincial level is also responsible for institutional development and capacity building of local government so that municipalities can effectively perform their functions. However, local government is also responsible for its own capacity building.

In addition to capacity building, local government has several roles and responsibilities. Section 3.3.2 outlines the function of local government and structural changes that have occurred since 1994.

3.3.2 Developmental Local Government

Local government in South Africa is seen as the site of transformation and platform for the fight against poverty (Pieterse 2002). The function of local government is reconstruction and development, effective service delivery, and enhancing conditions for economic growth. Local government is an important sphere of government because it is able to execute state functions, encourage development, and secure the legitimacy of the state, more effectively than national government (Lemon 2002).
Local government has experienced two significant changes since the 1994 elections (Buthelezi and Dollery 2004). Firstly, local government had to achieve the political unification of municipal areas which were previously racially divided. Secondly, local government had to redefine its nature and role so that it no longer functioned as an instrument of racial separation and social change. The transformation of local government was viewed as a priority for national government as the structure of local government inherited from the apartheid government would have been unable to tackle development and transformation effectively (Rossouw and Wiseman 2004). This was because local government was highly centralised and had little or no legitimacy, transparency, and accountability in terms of decision making.

South Africa has 284 municipalities which are divided into metropolitan, district or local municipalities (RSA 1998a). Category A or metropolitan municipalities, such as eThekwini Municipality, have exclusive municipal or legislative authority in their area. Category C or district

municipalities, such as Ilembe District Municipality, have executive and municipal authority in an area that includes more than one municipality. For example Ilembe District Municipality consists of four local municipalities; KwaDukuza, Ndwedwe, Maphumulo, and eNdondakusuka. Category B or local municipalities, such as KwaDukuza Municipality, share their executive and municipal authority with their respective district municipality.

The South African government has attempted to create a framework for sustainable governance by endowing local government with a considerable amount of autonomy (Chipkin 2002). In this context, autonomy refers to the operational independence of local government in terms of functions, such as decision-making, organisation, structure, and implementation approaches. However, local government in developing countries are often characterised by a high degree of political and administrative centralisation (Pieterse 2002). This is because of a weak local tax base, limited capacity (human and physical), and the ineffective control and management of resources. This creates opportunities for non-state actors, such as environmental consultants, to perform traditional municipal functions in the absence of in-house capacity. The functions include institutionalising environmental issues into policy or to increase a particular government departments' capacity (Sowman 2002).

Pieterse (2002) identifies four essential factors needed to achieve successful decentralisation of local government. These factors are sufficient power and political influence, the financial resources to achieve tasks efficiently, adequate administration to manage the tasks, and legitimacy and accountability. The capacity to effectively achieve tasks is one of the greatest challenges affecting local government. Section 3.3.3 focuses on the definition of capacity and capacity challenges facing local government, such as the KwaDukuza and Rustenburg Municipalities.

3.3.3 Local Government Capacity

One of the greatest challenges facing local government in many developing countries is the formulation and implementation of appropriate environmental policies (Babu 2000). This is largely due to a lack of the capacity to design and implement effective policies to prevent the degradation and promote the sustainable use of their natural resources. Cloete (2002) defines capacity as the ability to perform tasks effectively, efficiently, and sustainably. Capacity building is seen as the ability to mobilise the available resources in order to achieve a particular task. However, capacity is difficult to define because the way in which it is defined determines which characteristics are said to be present

or absent. In the context of this research, capacity can be seen in terms of three interrelated components. These are individual, institutional, and environmental components of capacity (DPLG 2004).

Individual Capacity

Individual capacity refers to the "potential and competency, or lack thereof that is found within a person" (DPLG 2004: 12). This potential and competency is generally reflected in a person's technical and generic skills, knowledge, attitude and behaviour, as well as education, training, values and experience. This is the reason that local government is required by several pieces of legislation, such as the Skills Development Act (Act 97 of 1998) to appoint suitable people and to develop their existing human resource capacity through initiatives, such as training or education (RSA 1998c).

The first challenge facing local government is the lack of individual capacity. The lack of competence within municipalities is due to several factors, such as inexperience, poor job descriptions, the appointment of staff into incorrect positions, inadequate technical skills, knowledge and expertise, and poor attitude or behaviour (Walmsley 2005; DPLG 2004; Cloete 2002). This situation is compounded by the work overload, high staff turnover, and ineffective legal and institutional frameworks that environmental authorities have to work in. These problems are largely due to the high number of senior public officials with expertise and experience that left during the transformation of local government and replaced by staff with less skills and experience. Walmsley (2005) argues that even experienced public officials find it difficult to make consistent decisions between long-term resource losses and short-term economic growth. This is the reason that junior staff would find it difficult to balance development against the three pillars of sustainable development and environmental justice.

An ethics survey was conducted in 2002 by the University of Stellenbosch to determine the ethical concerns of several stakeholders involved in environmental decision making in Cape Town (Hattingh and Seeliger 2003). The stakeholders included community-based Non Government Organisations (NGOs), municipal politicians, businessmen and developers, environmental consultants, researchers, and scientists. Provincial and local public officials were also included in the survey. The ethics survey found that in general decision makers were seen as being poorly qualified or experienced to make many of the important environmental decisions that they were confronted with (Hattingh and Seeliger

2003). Only 38% of the respondents indicted that public officials were seen as being competent. The respondents indicated that the lack of competence left officials open to persuasion because they had to depend on environmental consultants to educate them so that they can make decisions and provide the consultants with meaningful feedback. However, Babu (2000) found that the strengthening of local capacity through training was more effective in dealing with complex environmental problems than continuously relying on professional or outside institutions. This was because public officials are able to use policy information more effectively in decision making processes if they have been meaningfully involved in the generation of the information.

Institutional Capacity

Institutional capacity refers to the "potential and competency, or lack thereof, found within organisations" (DPLG 2004: 12). This potential and competence refers to strategic leadership, institutional memory, partnerships, and inter-governmental relations. Cloete (2002) integrates elements, such as institutional responsibility, ethics, and accountability into the definition of institutional capacity.

The second challenge facing local government is the lack of institutional capacity. There are several factors which affect institutional capacity, such as insufficient support staff, the inability to attract appropriate people, poor operational structures, systems and structures, and institutional memory (Walmsley 2005; DPLG 2004; Cloete 2002). Institutional memory in this situation refers to the prevailing ideologies, cultures, and modes of decision making within a particular municipality.

Institutional incapacity can be illustrated using an adaptation of the concept of the 'ingenuity gap' (Hattingh *et al*. 2003). In Figure 3.4 the demand for capacity constitutes two components. The first is technical capacity, such as scientific expertise and experience, and secondly, social capacity or the ability to negotiate between competing stakeholders, negotiate agreements, and sustain political legitimacy. The growing complexity of environmental problems increases the demand for capacity, while the supply of capacity is decreasing. The supply of capacity is decreasing because of several reasons, such as the overloading of institutions or the loss of public officials to the private sector. The gap between the demand and supply of capacity can be seen as the capacity gap.

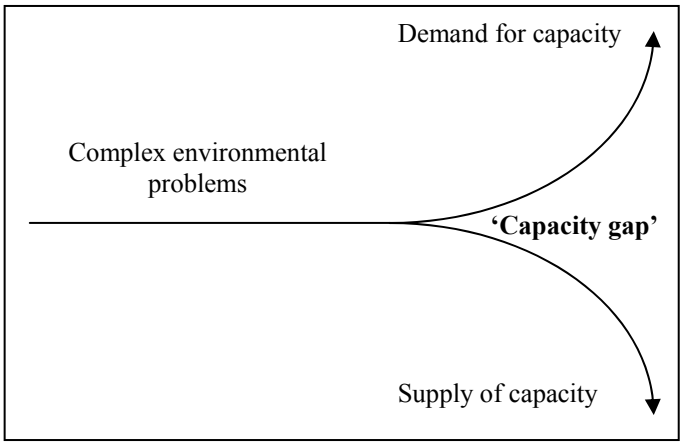

Figure 3.4: The capacity gap within local government (adapted from Hattingh *et al*. 2003)

Babu (2000) found that many developing countries, especially those in Southern Africa do not have certain departments, such as environmental departments at the local level. This is the reason that environmental policies are often passed on to other departments, such as town-planning, were there is sufficient capacity. This situation represents an inefficient use of those departments' resources. It is also undesirable because that particular department may integrate its mandates into those policies. This creates a cyclical situation within developing countries of uninformed decision making. Rossouw and Wiseman (2004) argue that it is not only within departments that there is a lack of institutional capacity, but also in the integration and cross sectoral linkages between departments. The University of Stellenbosch ethics survey found that 85% of respondents indicated that local authorities and provincial authorities, as well as the heads of departments, do not work together in environmental decision making (Hattingh and Seeliger 2003).

Environmental Capacity

The final component, environmental capacity refers to the socio-political context of the municipality. The DPLG (2004: 13) defines environmental capacity as the "potential and competency, or lack thereof, found outside of municipalities formal structures". This capacity refers to elements that the municipality has very little or no influence on, but need to act upon. These elements include the socio-economic demography of the municipality, the political, legislative or social capacity of civil society, and natural or environmental issues.

The final challenge facing local government is a lack of environmental capacity. The factors which affect environmental capacity include balancing poverty, development and ecological priorities, spatial transformation, weak structures to incorporate civil society into decision-making, and overlapping or unclear national and provincial legislation (Walmsley 2005; DPLG 2004; Cloete 2002). In South Africa, local government faces increasing pressure from local communities which demand services and transformation. However, this pressure may actually weaken the municipality further. Babu (2000) argues that in order for a policy to be effectively formulated and implemented it needs to be consistent with the economic and political environment of that particular country or region. For example in South Africa, policy has to be sensitive to South Africa's unique social, economic, and political context.

The ability of local government to produce appropriate environmental policies is often undermined by the ambiguity in the policy process itself. There tends to be ambiguity between the autonomy of the local state as an independent political institution and its role as an administrative or managerial body of central government responsible for implementing national policies, such as GEAR (Chipkin 2002). The University of Stellenbosch ethics survey found that 86% of respondents indicated that political pressure cause hasty development decisions to be made and 85% said that politicians promote development decisions that are politically motivated rather than environmentally informed (Hattingh and Seeliger 2003).

The large number of often overlapping and conflicting pieces of legislation is another challenge which affects local government. This is because public officials have to develop environmental policies that integrate all the relevant legislation. Section 3.3.4 outlines the national and local legislation that influences municipal environmental policy making processes.

3.3.4 Local Government Legislation

There are two broad sets of legislation which affect the local government level in terms of environmental decision making. The first set consists of legislation which outlines the role and structure of local government. The second set consists of legislation which outlines the environmental management responsibilities of local government.

Role and Structure of Local Government

There are several pieces of legislation which refer to role and structure of the local level of government. These include the Constitution of South Africa (Act 106 of 1996), the White Paper on Local Government (1998), the Municipal Structures Act (Act 117 of 1998), and the Municipal Systems Act (Act 32 of 2000) (Buthelezi and Dollery 2004).

The Constitution of South Africa (Act 106 of 1996) is the most important legislation describing the role and structure of local government. The Act states that local government needs to provide a democratic and accountable government, promote a safe and healthy environment, promote social an economic development, and ensure effective service delivery (RSA 1996). Rossouw and Wiseman (2004) argue that the Constitution of South Africa (Act 106 of 1996) is important because it is the first piece of legislation which institutionalises environmental concepts, such sustainable development and environmental justice.

Section 24 of the Constitution of South Africa (RSA 1996: 1252) states "that everyone has the right:

- to an environment that is not harmful to their health or well-being; and
- to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that prevent pollution and ecological degradation; promote conservation; and secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development".

The importance of the White Paper on Local Government (1998) is its emphasis on incorporating civil society in working towards sustainable development at the local level (RSA 1998d). To achieve this aim, municipalities are required to structure and manage their administration, financing, and planning functions to prioritise the basic needs of the community. Various Acts were promulgated to support the principles adopted in the White Paper. These are the Municipal Structures Act (Act 117 of 1998) and the Municipal Systems Act (Act 32 of 2000). The Municipal Structures Act (Act 117 of 1998) (RSA 1998a) outlines the types and categories of municipalities, such as category A, B or C, and how these municipalities are established. It also discusses the internal structures, powers, and functions of municipalities. The Municipal Systems Act (Act 32 of 2000) (RSA 2000) outlines the internal systems of municipalities that enable them to operate and bring about the social and economic upliftment of local communities. This Act discusses the legal nature and duties of

municipalities and the powers and functions available to them. This Act also prescribes that each municipality must undertake developmentally-orientated planning based on a five year Integrated Development Plan (IDP).

An IDP is a "single, inclusive, and strategic plan for the development of the municipality" (RSA 2000: 37). The IDP is one of the tools available to local government which can assist them in realising their developmental role (KLM 2006). The aim of the IDP is to link, co-ordinate, and be compatible with national, provincial, and local legislation and plans. The implementation of the IDP should align the capacity and resources of the municipality and form the general framework for the municipal budget (RSA 2000). The key focus of the IDP is long term development, internal transformation, and the provision of basic municipal services.

The White Paper on Spatial Planning and Land-use Management (2001) is also important as it recognises that uncontrolled development is undesirable because it has adverse effects on natural habitats, cultural landscapes, and air and water quality (RSA 2001). The Municipal Systems Act (Act 32 of 2000) and White Paper on Spatial Planning and Land-use Management (2001) mandate that each municipality has to compile a Spatial Development Framework (SDF) (Rossouw and Wiseman 2004; RSA 2001). A SDF is one of the required sector plans of the IDP. A SDF concentrates on the spatial aspects of development planning, while the IDP focuses on the broader developmental and financial issues (RLM 2004). The aim of a SDF is to provide a framework which guides and informs municipal decisions in terms of use, development, and planning of land (Rossouw and Wiseman 2004; RSA 2001). One of the core principles of the SDF is that it needs to ensure the social, economic, and environmental sustainability of the area. The importance of a SDF for this research is that it requires a strategic environmental plan which guides development, i.e. a SEA. The legislative requirement to develop a strategic environmental plan is another reason that both the Rustenburg and KwaDukuza Municipalities made the decision to undertake a SEA.

Environmental Management Legislation

There are two key pieces of environmental management legislation which affect local government. These are the National Environmental Management Act (NEMA) (Act 107 of 1998) and the Environmental Conservation Act (ECA) (Act 73 of 1989).

The National Environmental Management Act (Act 107 of 1998) outlines several principles for decision makers with regards to the environment (RSA 1998b). There are 20 principles which guide decision makers in terms of managing and protecting the environment. These principles are framed by social and environmental justice and generally align with the core principles of a SEA (NWPG 2004). These principles emphasise that people and their concerns need to be put at the forefront of environmental management and equitably take into account their physical, psychological, developmental, cultural, and social interests. NEMA also emphasises the importance of public participation and legal and financial accountability.

The Environmental Conservation Act (ECA) (Act 73 of 1989) emphasises that decision makers need to take into account the impact of activities on the environment before a decision is given (RSA 1989). The aim of the ECA is to promote sustainable development and ensure that the environment is not harmful to people's health and well-being (NWPG 2004). The two key sections of the ECA are Sections 21 which list the activities which require an EIA and Section 26 which outlines the content and procedures for compiling an EIA.

However, as of the 1 July 2006 the EIA regulations listed in the ECA were replaced by the new EIA regulations listed in Chapter five of the amended NEMA (Van Schalkwyk 2006). The aim of the new EIA regulations is to streamline the EIA application process and to reduce the backlog of EIA applications. The main differences between the ECA regulations and the NEMA regulations is the introduction of mandatory timeframes in which authorities have to make a decision on an application and the creation of two schedules which list the activities that require an EIA (Van Schalkwyk 2006; RSA 2006). The activities listed in schedule one, such as the "temporary storage of hazardous waste" (RSA 2006: 138) only require a basic assessment, while activities in the second listing, such as "the use, recycling, handling, treatment, storage or final disposal of hazardous waste" (RSA 2006: 170) require a more comprehensive assessment in terms of scoping or an EIA. The new EIA regulations also recognise the importance of other strategic spatial planning tools, such as Environmental Management Frameworks (Van Schalkwyk 2006).

In order to understand how the capacity challenges of local government and relevant legislation influence environmental decision making, it is important to examine how environmental considerations are institutionalised in local government. Section 3.4 focuses on the ways in which environmental issues are integrated into environmental decision making.

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3.4 Integrating the Environment into Local Government

The final section of this chapter focuses on integrating the environment into municipal policy making processes. This section discusses the institutional arrangements for integrating the environment into local government and the environmental management tools which are available to policy makers. The discussion of environmental management tools focuses on Integrated Environmental Management (IEM) and in particular on SEAs.

3.4.1 Environmental Institutional Arrangements

Sowman (2002) argues that local government in South Africa has a legislative mandate to institutionalise environmental considerations into decision making processes. NEMA (RSA 1998b: 9) defines the environment as "the surroundings within which humans exist and are made up of:

- the land, water, and atmosphere of the earth,
- micro-organisms, plant and animal life,
- any part or combination of 1 and 2 and the relationship between them,
- the physical, chemical, aesthetic, cultural properties and conditions of the foregoing that influence human health and well-being"

There are three institutional arrangements in which environmental issues can be incorporated into municipal decision making processes (Sowman 2002). The first institutional arrangement is to integrate the environmental issues within each of the existing departments, such as town planning. In this arrangement, environmental specialists are embedded in each department and responsible for discussing and mainstreaming environmental issues into that particular department's policy making processes. However, this arrangement is only viable for larger municipalities which have the necessary financial and human capital. The second institutional arrangement is to enhance the environmental capacity of public officials already in each department through courses and training (Sowman 2002). However, this option is not feasible for smaller municipalities because some departments may be absent or public officials have too many existing responsibilities. Another shortcoming of these two arrangements is that environmental issues may become diluted or removed off the agenda because there is weak concentration of environmental expertise in the departments.

In the final institutional arrangement, a separate environmental department is formed to ensure that municipal decision making processes integrate environmental considerations. Sowman (2002) argues that this arrangement is the most appropriate strategy as it less likely that environmental issues become diluted or removed off the agenda. This department would be able to specialise and focus on environmental issues because there is a concentration of environmental expertise. For example, the City of Cape Town has an Environmental Branch which was institutionalised to ensure that environmental considerations are integrated into policy development and to implement environmental policies and legislation (Oelofse *et al*. 2006). However, this arrangement may also impede the mainstreaming of environmental issues into activities and processes of government because of the departments autonomy and position in the hierarchy (Sowman 2002). The department may also just act as an add-on feature to policy making processes. Oelofse *et al*. (2006) found that there needed to be wide-scale institutional restructuring in the City of Cape Town in order for the Environmental Management Branch to effectively implement environmental policies. This is because the Environmental Branch had a poor relationship and linkages to other municipal departments.

In addition to these institutional structures, there are several environmental management tools which local government can use to integrate environmental issues into municipal environmental decision making. Section 3.4.2 outlines what is meant by integrated environmental management and what tools are available to decision makers.

3.4.2 Integrated Environmental Management

The suite of environmental management tools available to municipal decision makers fall under the framework of Integrated Environmental Management (IEM) in South Africa (DEAT 2004a). The most commonly used tools are summarised in Figure 3.5. The tools are arranged in terms of their position in a hierarchy of activities and stage in the activities life cycle were they are implemented (DEAT 2004a). In the context of this research, the three most important environmental management tools are a SEA, an EIA and an Environmental Management Plan (EMP). These tools are discussed in the following section.

The aim of an EMP is to specify how a project should be managed to minimise the impacts on the environment and enhance the benefits throughout the lifecycle of the project (DEAT 2004a; DEAT 2004c). An EMP outlines the environmental impacts, mitigation measures, roles and responsibilities

of environmental managers, timescales, and costs of mitigation. An EMP is a document which describes the methods and procedures for monitoring and managing impacts. An EMP provides a link between the impacts identified in the EIA, mitigation measures specified in the EIA, and implementation and operating procedures of the project. Therefore, an EMP aims to ensure that mitigation measures associated with a particular project are fulfilled. An EMP also facilitates the progress towards environmental targets and provides a tool for continuous environmental improvement, especially in the private sector.

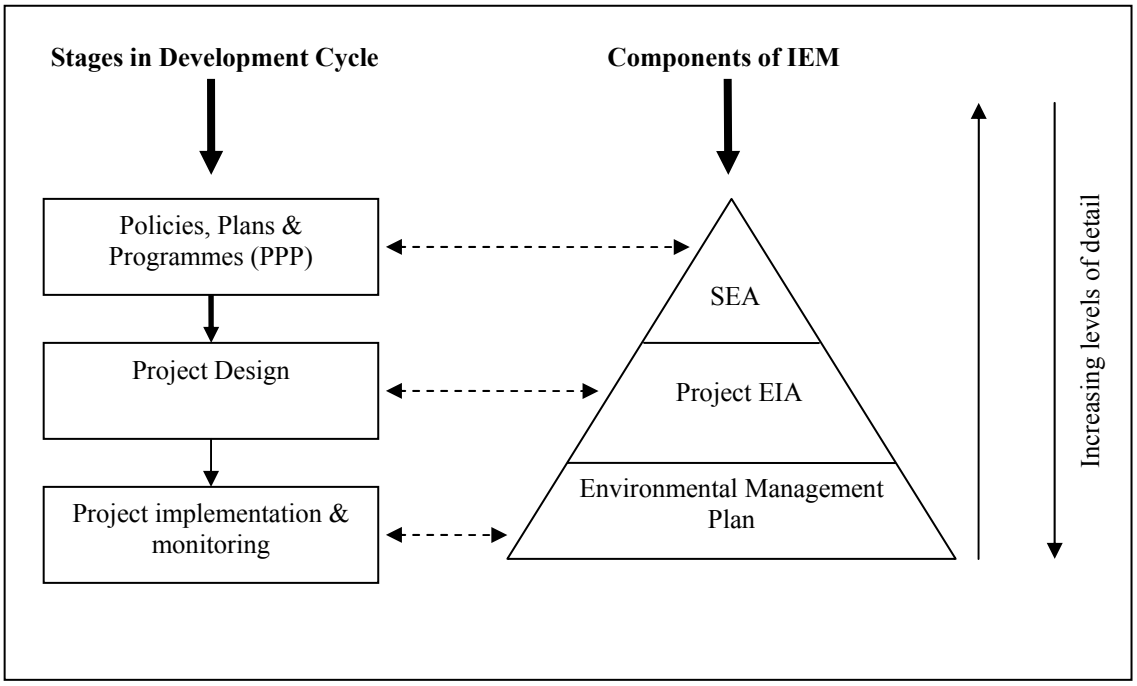

Figure 3.5: Hierarchy of tools in relation to a typical development cycle (DEAT 2004a: 15)

The aim of an EIA is to predict the positive and negative impacts of a proposed project (DEAT 2004a). An EIA also has to recommend mitigation measures for negative impacts, tailor the project to suit environmental limitations, and present predictions and alternatives to decision makers. An EIA differs from a SEA because it is project specific, site specific, and does not deal with strategic issues. There are two key phases of an EIA (DEAT 2004a). The scoping phase determines the spatial and temporal boundaries of the EIA, key issues, and project alternatives to be addressed in the EIA. The scoping phase highlights which key issues need to be investigated in the assessment phase to effectively inform decision making. The assessment phase investigates the issues that were identified in the scoping phase. The Environmental Impact Report includes an assessment of potential impacts,

recommendations to enhance the positive aspects and mitigate the negative aspects of those impacts, specialist studies, and assessments of impact significance.

The final tool included in Figure 3.5 is a Strategic Environmental Assessment (SEA). Internationally and in South Africa, SEA evolved complementary to EIA in order to inform the more strategic decisions that take place above project level decision making processes (Chaker *et al*. 2006; DEAT 2006; DEAT 2004b; NWPG 2004). The SEA emerged because of the inability of EIA to effectively deal with higher levels of decision making and the narrow focus on biophysical issues (Wallington *et al*. 2007). While an EIA focuses on the positive and negative impacts of a specific development, a SEA assists decision makers in identifying the most suitable development for a particular area (DEAT 2006; DEAT 2004b; NWPG 2004). A SEA also focuses on the constraints and opportunities that the environment has on development and not the impacts that the development will have on the environment.

South Africa is considered a leading developing country in terms of SEA practice as the practice has become well established and on the increase. Retief *et al*. (2007a) argue that strategic level assessment has been taking place in South Africa since the 1970s and between 1996 and 2003, 50 documented SEAs were undertaken. South Africa is also considered a leader in terms of the development of SEA practice because the Department of Environmental Affairs and Tourism (DEAT) developed a 'home-grown' and context specific approach to SEA, while internationally there was still confusion over the concept. The approach is presented in the IEM SEA Guideline documents (Retief *et al*. 2007a; DEAT 2006; DEAT 2004b). However, SEA practice by municipalities in South Africa remains largely voluntary and *ad hoc* in nature.

Despite the extensive practice of SEA internationally and in South Africa, no single definition or understanding of a SEA has emerged because of the unique and diverse contexts in which SEA is applied (Retief *et al*. 2007a). This is one of the greatest strengths and also criticisms of a SEA (DEAT 2004b). Retief *et al*. (2007a) argue that there has been an international shift away from identifying a common definition to developing a core set of principles which frame a SEA. The IEM SEA Guidelines (2006; 2004) outline several core principles of a SEA. These principles state that a SEA should be driven by sustainability, identify the opportunities and constraints that the environment places on development, and provide an agreed level of environmental quality. The SEA process itself should be flexible and strategic, as well as its scope being defined by the wider context of environmental processes in a specific area. A SEA should also be participatory, identify alternative

scenarios, include concepts, such as the precautionary principle, and encourage continual improvement (DEAT 2006; 2004b).

In addition to these core principles, the Guidelines also provide a broad definition of a SEA as a "process of integrating the concept of sustainability into strategic decision-making" DEAT (2004b: 4). A SEA provides several benefits to environmental decision making. Firstly, a SEA can be used to streamline and reduce the complexity of EIA application by broadening the range of alternatives, integrating cumulative impacts into the assessment or establishing agreed upon levels of environmental quality (DEAT 2004b; Fischer 2003). Secondly, a SEA can be used to address the cause of environmental problems and not just the symptoms. This is because a SEA can be used to integrate the concept of sustainability and environmental issues into environmental decision making. A SEA is therefore a tool which supports informed and sustainable decision making (Fischer 2003). Lastly, a SEA can be used to gain the support of civil society because the process is participatory (DEAT 2004b). Therefore, a SEA provides a framework for integrating conflicting goals and objectives from different levels into decision making at a strategic level (Fischer 2003).

Chaker *et al*. (2006) conducted a comparative survey of SEA practice in 12 selected countries based on the legal, institutional, and procedural frameworks of each country. Chaker *et al*. (2006) found that SEA practice in South Africa, like Canada, Portugal and the United Kingdom, is decision-centred and is often adapted to planning and policy making. Therefore, the planning process drives SEA practice in South Africa and SEA practice is shaped by the decision making system of the country.

Retief *at al*. (2007a) identified two broad types of SEA practice in South Africa. The first type of practice refers to a SEA as a decision support tool for integrating environmental considerations and sustainability into Policy, Plans or Programmes (PPP) (Retief *at al*. 2007a; Retief *at al*. 2007b; Chaker *et al*. 2006; Fischer 2003). This is the most common application of SEA practice in South Africa and represents 64% of the 50 SEAs surveyed by Retief *at al*. (2007a; 2007b) between 1996 and 2003. The relationship between an EIA, a SEA, and PPP is illustrated in Figure 3.6. The role and benefits of a SEA is often determined by its position in the decision making process. For example, a SEA can be used to either develop or assess an existing policy and plan, as an advocacy role to raise the profile of the environment in decision-making or to assist in integrating sustainability into development (DEAT 2004b). The most common application of this type of SEA is at the policy level. Policy in South Africa is defined as a "strategic aim, broad vision, proposed direction, course of action or 'statement of intent' that government or an organisation intends to pursue" (DEAT 2006:

20). A SEA therefore provides a pro-active approach to integrate environmental and sustainability considerations into policy (DEAT 2006).

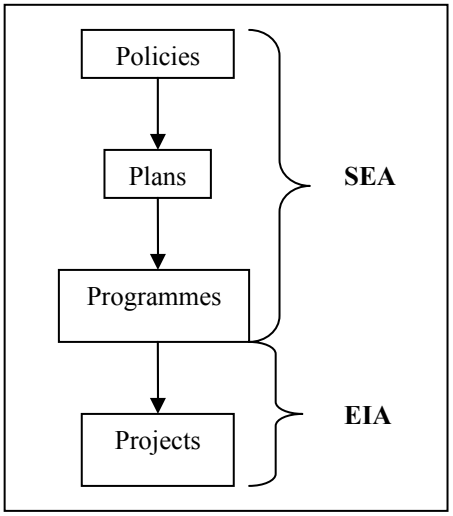

Figure 3.6: The linkages between the different tiers of environmental decision making (policies, plans, programmes and projects), SEAs, and EIAs (DEAT 2006).

The second type of SEA practice in South Africa refers to the application of a SEA to fill a void between project level decisions and policy level decisions. The SEAs are not linked to PPP decision making processes, but provide a strategic basis for project level decision making. In this situation, a SEA is not an assessment of PPP, but a tool for identifying the opportunities and constraints, thresholds, carrying-capacity, and limits of acceptable change of specific area. Retief *at al*. (2007a) refers to these SEAs as 'pro-active' SEAs as they provide strategic level information for quick and easy project level decision making. However, the lack of initial capacity and resources to make effective decisions means SEAs are often not used because these capacity challenges still persist.

The success of developing a SEA is dependant on who drives and manages the policy process. Retief *at al*. (2007a) found that SEAs in South Africa consist of a lead actor who manages the project and a consultancy firm which conducts the SEA. None of the SEAs in which government is the lead actor were conducted exclusively 'in-house'. This is because a SEA requires a variety of policy making skills that are often not available or fragmented across government departments, business or in institutions (DEAT 2006; Sowman 2002). Retief *at al*. (2007a: 51) found that environmental consultants play a leading role in a SEA and that "the extensive use of external consultancies suggests the majority of SEA expertise lies within the private sector". This is the reason that "in South Africa,

SEA – from its inception through to the present – has been driven largely by the consultancy sector" (Retief *et al*. 2007b: 5). The widespread use of environmental consultants is because consultancies can "provide the capacity, flexibility, expertise, adaptability and opportunism required to make a concepts such as SEA work" (Retief *et al*. 2007b: 5). However, Retief *et al*. (2007b) found that environmental consultants were also responsible for creating a demand for a SEA by marketing a SEA as a tool to deal with legislative need for sustainability in PPP. Therefore, legislation is one of the greatest drivers of SEA practice in South Africa, despite SEA being voluntary and not formally legislated.

For a SEA to be effective, the lead actor needs to ensure that the SEA covers all the issues and that the documents are useable. This is the reason that the SEA process requires effective and committed engagement from all the stakeholders involved (DEAT 2006). Despite the inclusion of environmental consultants, the implementation of a SEA is likely to be ineffective without the buy-in of the public officials. Retief *at al*. (2007b) and Chaker *et* al. (2006) argue that SEA effectiveness has received very little attention in international and South African literature. The effectiveness of a SEA depends on the purpose of the SEA, the influence on PPPs, achievement of sustainability objectives, and improvement of environmental quality. Based on these indicators, many of the SEAs surveyed in South Africa were found to relatively ineffective (Retief *at al*. 2007b).

Retief *at al*. (2007b) argues that these SEAs were ineffective for three reasons. Firstly, there is a lack of focus because the scope of the SEA is too extensive and deals with too many issues, objectives, and indicators. This is largely because "consultancy driven SEA practice in South Africa facilitates a distinctly technical-rational approach" which struggles to deal with qualitative aspects, prioritise issues, and focus (Retief *et al*. 2007b: 05). Wallington *et al*. (2007) argues that a SEA needs to move beyond the 'impact assessment mindset' of the technical-rational approach of EIA because it cannot address the challenges of strategic objectives. This criticism emerged from the growing awareness that EIA-based SEA approaches are inadequate and that there needs to be greater integration in decision making processes (Fischer 2003). Secondly, there is a lack of integration as the SEAs are not effectively integrated into decision making processes. This is mainly due to a poor understanding of the nature of a SEA. Thirdly, there is a lack of assessment because many SEAs are largely planning exercises and not assessments.

3.7. Conclusion

This chapter presents the context of this thesis and provides an overview of the KwaDukuza and Rustenburg SEAs. These SEAs are used as case studies to interpret the influence of environmental consultants on municipal environmental decision making. The overview of the study areas shows that both the KwaDukuza and Rustenburg Municipalities are experiencing a rapid rate of development due to their rich natural resources and strategic position. In response to the impact of development on the natural environment, both municipalities made the decision to undertake a SEA.

This chapter also provides a context of local government in South Africa. Since the end of apartheid in 1994, the core responsibilities of government at the local level include promoting development, transformation, and effective service delivery. However, one of the greatest challenges preventing local government from fulfilling its developmental role is a lack of individual, institutional, and environmental capacity. These capacity constraints create several challenges which prevent local government from formulating and implementing effective environmental policies. These constraints open up policy making processes for non-state, such as environmental consultants, to influence environmental decision making processes.

In addition to the challenges of developing new environmental policies, policy makers need to ensure that new policies are consistent and compatible with existing legislation and policies, such as the Constitution of South Africa (Act 106 of 1996), the Municipal Structures Act (Act 117 of 1998), NEMA (Act 107 of 1998), and ECA (Act 73 of 1989). In order to comply with national and local legislation, such as the Municipal Systems Act (Act 32 of 2000) which requires strategic developmental planning, the KwaDukuza and Rustenburg Municipalities made the decision to undertake a SEA.

Section 3.4 discusses three institutional arrangements for integrating the environment into municipal decision making processes. Municipalities can either train all their staff to effectively deal with environmental issues, assign an environmental specialist to each department or to have a separate specialist environmental department. Although each of these options has their advantages and disadvantages, the creation of an environmental department was found to be the most appropriate institutional arrangement. In addition to these structures, several environmental management tools are also available to decision makers to ensure that environmental issues are integrated into policy processes. Three of the tools which are most commonly referred to are EIA, SEA, and EMP.

Although is difficult to define a SEA due to its flexibility, both the KwaDukuza and Rustenburg Municipalities use a SEA as decision making tool for integrating the principles of sustainable development into municipal planning processes.

CHAPTER 4: METHODOLOGY

4.1 Introduction

The methodology of this research is set within the philosophical approach of social constructivism. This philosophy was adopted because constructivist approaches recognise that language is not just a medium for communication, but structures the way in which actors interpret reality (Terre Blanche and Durrheim 1999). The meaning embedded in language therefore influences the way in which actors define, interpret, and seek solutions for particular environmental problems (Dryzek 1997). In order to interpret the meaning embedded in language, this research adopts an interpretive approach to policy analysis. In contrast to traditional policy analysis, interpretive policy analysis does not assume that there is a divide between knowledge creation and politics (Mottier 2005). Discourse analysis is a specific interpretive approach which provides a robust theoretical and methodological approach to understand the language used in environmental policy processes (Hajer 2006; 2005a). A discourse analysis is applied to the KwaDukuza and Rustenburg SEA policy processes to understand the role of environmental consultants in municipal environmental decision making.

Chapter four focuses on the methodology used in the collection and interpretation of data for this research. Section 4.2 discusses an interpretive, qualitative approach to policy analysis and why this approach was adopted over traditional approaches to policy analysis. Section 4.3 briefly introduces argumentative discourse analysis and the reasons for the selection of Hajer's (2006; 2005a) analytical approach to discourse analysis. The primary and secondary data sources of this research are outlined in Section 4.4. Section 4.5 provides a description of how the oral data was collected and focuses on the nature of interviews, the interview process, and the interview guide. Section 4.6 outlines the sampling methods that were used and the reasons for the adoption of particular approaches. Section 4.7 provides an overview of Dey's (1993) 'omelette' approach which was used to interpret the primary data collected for this research. The challenges of this research are discussed in Section 4.8.

4.2 Interpretive, Qualitative Analysis

Robinson (1998) argues that qualitative data analysis differs from quantitative data analysis because qualitative data is produced within social practices that are constantly changing or shifting. This is the reason for the variety of qualitative data analysis techniques (Kitchin and Tate 2000). Qualitative

techniques can generally be grouped into three categories; language, experience or meaning, and connections between phenomena.

Social constructivism is a philosophical approach which uses language as the object of analysis (Fairclough 2003; Terre Blanche and Durrheim 1999; De Beaugarde 1997; Van Dijk 1997). In contrast to other linguistic approaches, social constructivism recognises that meaning is embedded in language and that actors use these broader systems of meaning to construct social reality. This research adopts a social constructivist approach because one of the objectives of this research is to interpret the language used in the KwaDukuza and Rustenburg SEAs.

This research adopts an interpretive approach to policy analysis to understand the signs and images embedded in language. It is important to interpret these signs and images because actors use them to define environmental problems and determine which solutions are considered legitimate. Interpretive policy analysis was adopted because of two criticisms of the traditional, positivist approach to policy analysis (Hajer and Wagenaar 2003; Hajer 1995; Fischer 1993). Firstly, positivist policy analysis does not recognise the links between policy processes and politics. In contrast, interpretive policy analysis recognises that knowledge is socially constructed because policy makers interpret reality in terms of signs and meanings and express these meanings through discourse. Secondly, positivist policy analysis focuses on broad social processes which affect policy processes, such as globalisation. In contrast, interpretive policy analysis focuses on how actors interpret the problems that they are faced with and to what extent they influence solutions to those problems. In order to understand the way in which these broad social processes and systems of meaning affect the policy process through language, a discourse analysis approach was adopted.

4.3 Discourse Analysis

Discourse analysis is an interpretive approach to policy analysis which falls within the umbrella of social constructivism. Discourse can be seen as a "shared way of apprehending the world" which conditions the way in which actors define, interpret, and find solutions for environmental problems (Dryzek 1997: 8). In contrast to other approaches to discourse analysis, Hajer (2006; 2005a) emphasises the importance of performance or practices in which discourses are constructed and transformed. This is the reason that Hajer (1995) defines discourse as a set of ideas or concepts which gives meaning to physical and social entities and are produced, reproduced, and transformed within a

particular set of practices. This research adopts Hajer's (2006; 2005a) 'three-dimensional analytical model' because it does not only focus on the language used in the environmental policy process, but also the performative dimension of environmental policy making. Two dimensions of this model are applied to the KwaDukuza and Rustenburg SEAs. These are the discursive and performative dimensions of policy making (Refer to Section 2.3.3).

The Discursive Dimension of Policy Making

Three concepts of the discursive dimension of policy making are applied in this research. These concepts are discourse, story lines, and policy vocabularies (Refer to Section 2.3.3.1). Discourse represents the systems of meaning in the environmental policy process which frame the way in which actors' environmental problems. The interpretation of discourse focuses on the dominant environmental discourses which frame the KwaDukuza and Rustenburg SEAs, where they originated, and their influence on the policy process. Story lines represent the rhetorical devices which actors used in the environmental policy process to frame discussions within a specific discourse. The interpretation of story lines focuses on the dominant story lines which actors used, what they represent, and which discourses they convey. Policy vocabularies represent the rhetorical devices which actors use to frame policy within a specific discourse. The interpretation of policy vocabularies focuses on the main vocabularies which actors used, what they meant, which discourses they convey, and why policy makers would use these particular vocabularies.

The Performative Dimension of Policy Making

The performative dimension of policy making is the second dimension which Hajer (2006; 2005a) includes in his model of discourse analysis. In contrast to other approaches to discourse analysis, this model includes the performative dimension of policy making which focuses on the practices in which discourse is produced, reproduced, and transformed (Hajer 2005a). This dimension consists of four concepts which are applied in this research. These concepts are scripting, staging, setting, and performance (Refer to Section 2.3.3.2). The application of the concept of scripting focuses on the script which brings the actors together, the stakeholders involved in the policy process, and the cues which determine the actors' appropriate behaviour. The analysis of the staging of the policy process focuses on the deliberately organised interactions between the stakeholders involved in the process,

old and new symbols, and distinguishes active actors from passive actors. The analysis of setting focuses on the physical location where interactions between actors take place and the props which are used during these interactions. The application of the concept of performance focuses on interactions which redefine the environmental problem facing the actors, creates new knowledge, and shifts the existing relations of power and trust between stakeholders.

This research therefore adopts a deductive methodology where Hajer's (2006; 2005a) discursive concepts of discourse, story lines, and policy vocabularies, and performative concepts of scripting, staging, setting, and performance provide prior categories which the methodology then sets out to interpret from the empirical data. The following section discusses the empirical data sources which were used in this research.

4.4 Data Sources

Several primary and secondary data sources are used to interpret the KwaDukuza and Rustenburg SEA policy processes. Primary data is data that has been collected from primary sources and which have not been analysed, such as interviews or observations (Kitchin and Tate 2000). Primary data sources that are used in this research include the oral data collected from interviews, policy documents, such as the SEAs, and legislation, such as the Constitution of South Africa (Act 106 of 1996). In contrast, secondary data is data that was not collected or analysed by the researcher themselves (Kitchin and Tate 2000). Secondary data sources that are used in this research include journals, books, and unpublished thesis.

These primary and secondary data sources are used to develop the theoretical framework (Chapter 2) and background chapter (Chapter 3) of this research. An extensive assortment of literature which includes books, journals, unpublished thesis, and official documents, such as the IDP and SDF of each Municipality are also used. The literature review was undertaken prior to the interviews so that it could provide a framework for the study itself and to inform the design of the methodology and data collection instruments. The framework highlighted which concepts from Hajer's (2006; 2005a) analytical model need to be included in the data collection and interpretation of the data. The following section outlines how the oral evidence which is used to understand the KwaDukuza and Rustenburg SEA policy processes was collected.

4.5 Oral Evidence

In addition to the oral evidence collected from the interview process, several other primary data sources were used, namely the SEAs, IDPs, and relevant legislation. This section focuses on the interview process and outlines the way in which the interview schedule was compiled, the way in which the interviews were conducted, and the interview guide which was adopted.

An interview schedule was compiled in consultation with public officials and environmental consultants from the KwaDukuza and Rustenburg SEAs in order to select respondents for the interview process. Each of the identified respondents was then contacted either telephonically or by e-mail. Prior to each interview, the potential respondents were provided with a brief rationale for the project and an overview of the type of questions that were going to be asked. The brief also included a section explaining that participation in this research is voluntary and participants can choose to remain anonymous. Many of the respondents asked to remain anonymous and for this reason the citing of the respondents statements in the results chapters is restricted to the interview number and project. It was decided that referencing the respondents' occupation, such as public official, environmental consultant or key stakeholder would reveal the identity of the respondent.

All of the interviews with the exception of one were conducted at the respondents' places of work and during office hours. This was done to provide a safe, comfortable, and familiar environment for the respondents (Robinson 1998). The other interview was conducted at the respondent's place of residence for convenience sake. The interviews were generally between forty-five minutes and an hour in duration. With the permission of the respondents, all the interviews were tape-recorded for several reasons. This was done to provide an accurate record of what was said, to allow the researcher to concentrate on the conversation instead of focusing on taking notes, and allow subtle nuances to be identified later (Valentine 2005; Cloke *et al* 2004; Kitchin and Tate 2000; Robinson 1998). As discourse analysis uses language to interpret discourse, it is important to collect data which is accurate and reflects the actual words used during the interviews. However, it was noticed that the presence of the tape recorder affected the quality of the responses as respondents tended to be more guarded and formal than they would usually be in a free-flowing conversation. Valentine (2005) argues that professionals in particular dislike tape-recording interviews because they are reluctant to have records of their comments.

The instrument that was used to collect the oral data was the semi-structured interview schedule (Refer to Appendix A). A semi-structured interview or interview guided approach is an approach that is less structured than standardised open-ended interviews, but more structured than conversational interviews (Kitchin and Tate 2000). The approach was used because it allows the interviews to be tailored to the particular individual and provides a great amount of flexibility (Robinson 1998). The aim of these interviews is to understand how individuals experience and make sense of the policy process and the meaning or significance that they attach to particular issues or social contexts (Valentine 2005; Hajer 1995). Interviews can therefore be seen as conversations with a purpose because the researcher is able to collect data whilst still being sensitive and people-orientated. As no closed questions were used, the respondents' experiences, feelings, and opinions could be more thoroughly explored (Kitchin and Tate 2000; Robinson 1998). This approach allows data that is rich, detailed, and multi-layered to be collected (Valentine 2005).

Another reason that an interview guide approach was used during the interviews was to ensure that particular questions were not overlooked (Cloke *et al*. 2004; Kitchin and Tate 2000; Robinson 1998). Although the guidelines for the questions were developed prior to the interviews, the exact wording and sequence of the questions was varied. This was done to facilitate the free-flow of conversation and so that particular avenues of inquiry could be explored. The interview questions were structured within themes that were based on the objectives of this research. The themes included the general background information on the respondents, issues and context of the SEAs, setting of the SEAs, democratic quality of the SEAs, and the relationship between local government and environmental consultants. The themes were structured to begin with descriptive or factual questions which would initiate conversation and allow respondents to talk more freely for the more thoughtful questions at the end of the interview (Valentine 2005).

However, the use of the approach reduces the comparability between the interviews and increases the role of the researcher in the interview because I become responsible for not only guiding the conversation, but ensuring that the main questions on the interview guide had been covered as well. Although the increased role of the researcher in the collection and interpretation of data introduces what Robinson (1998) refers to as 'interviewers' bias', the interpretive approach of this research views subjectivity as an essential component of qualitative research. In contrast to positivist approaches to policy analysis, interpretive approaches do not view data collection as the passive extraction of information, but as co-constructed between the interviewer and the respondent (Mottier 2005).

The main sources of primary data collected in this research are the SEAs and oral data collected from the interviews. The oral evidence was collected from selected respondents using a semi-structured interview guide approach. Due to the limited scope of this research, not every person involved in the KwaDukuza and Rustenburg SEAs could be interviewed. Those that were interviewed formed the sample group of this research. The following section discusses how this sample group was assembled.

4.6 Sampling

The following section outlines the compilation of the sample group for this research and the sampling methods. Although there are several approaches to sampling, this research adopts a purposive or non-random sampling method. In purposive sampling not everyone involved in the SEAs have a known chance of being selected for the sample (Parfitt 2005). This approach was adopted because the scope of this research is limited to the public officials, environmental consultants, and key stakeholders directly involved in the KwaDukuza and Rustenburg SEAs.

Although the role of the key stakeholders in the KwaDukuza and Rustenburg SEAs is beyond the scope of this research, two key stakeholders were included in the sample. The key stakeholders were included because they played a very prominent role in the KwaDukuza SEA. The sampling method can therefore be described as purposive and judgemental because the selection of respondents is dependant on human judgement (Parfitt 2005; Kitchin and Tate 2000). A snow balling technique was also used in determining the sample group. In this way, initial respondents were used to identify the other potential respondents that could be included in the sample (Kitchin and Tate 2000).

A total of 14 interviews were conducted with municipal staff, environmental consultants, and key stakeholders involved in the KwaDukuza and Rustenburg SEA policy processes. The interviews were conducted over a four month period between the 26 of March 2007 and the 14 of June 2007. Table 4.1 lists all the public officials, environmental consultants, and key stakeholders that were interviewed. The table includes each respondent's role and the date the interview was conducted.

Therefore, a sample group of this research was compiled using a purposive sampling method and snowballing sampling technique. The sample group consists of fourteen respondents which were selected because they were directly involved in the policy processes of the KwaDukuza and

Rustenburg SEAs. The following section outlines the qualitative approach which was used to interpret the data collected from the interviews and SEAs.

Table 4.1: Interview schedule and respondent's details for KwaDukuza SEA and Rustenburg SEA

ROLE	INTERVIEW DATE
KwaDukuza SEA	
Public official	4 April
Public official	4 April
Project Consultant	4 April
Project Consultant	9 April
Key stakeholder	5 June
Key stakeholder	14 June
Rustenburg 1 SEA	
Public official	26 March
Project Consultant	27 March
Project Consultant	27 March
Public official	17 April
Rustenburg 2 SEA	
Public official	26 March
Public official	26 March
Project Consultant	27 March
Project Consultant	20 April

4.7 Data Interpretation

This section describes the interpretive approach which this research adopts and discusses the steps which were followed in each stage of the interpretation process. This interpretive approach is based on Dey's (1993) 'omelette' approach. This approach consists of three stages which are shown in Figure 4.1. The three stages are description, classification, and connection.

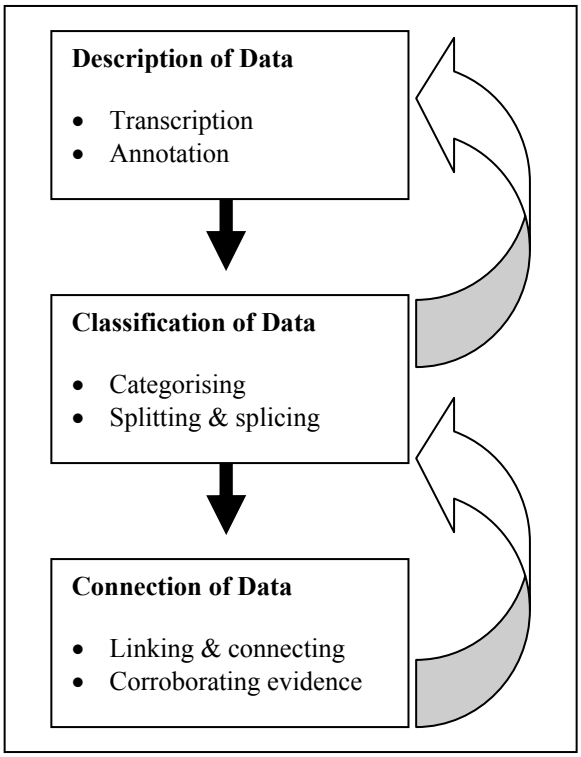

Figure 4.1: Description, classification and connection (Adapted from Dey 1993: 31)

The description stage of data analysis is central to any study and can be seen as the initial portrayal of the data in a form that can be easily read and interpreted (Crang 2005; Kitchin and Tate 2000; Dey 1993). The description stage consists of two steps; transcription and annotation. In the transcription step the interviews are transcribed into text, while in the annotation step notes or comments are added to the transcripts by the researcher through a process of reflection on the possible meaning of the initial text. In this research, the tape recordings collected from the interviews were transcribed after each interview. This was done so that the transcripts would be as accurate as possible and that any notes or annotations which were made during the interview or further reflection could also be added (Valentine 2005; Kitchin and Tate 2000). As the methodological approach of this research focuses on language, the transcriptions did not need to include nuances or changes in speech patterns. This is the reason that the transcriptions can be seen as verbatim copies of what 'was' said and not 'how' it was said.

In the classification stage, the interpretation moved beyond data description to the first stage of interpretation where an attempt was made to make sense of the data (Kitchin and Tate 2000; Dey 1993). In order to interpret the data, the data had to be broken up into its constituent parts and these

parts placed into similar categories or classes. Using Hajer's (2006; 2005a) analytical model as a framework, each of the transcripts was interpreted in order to identify the discursive and performative concepts of the policy documents and interviews.

The first phase of classification focuses on the discursive concepts in the SEA policy processes. A deductive approach was adopted in order to develop four broad themes. The themes were based on the overall aim and objectives of this research. The four themes represent the master categories which were identified. The master categories or themes were 'what is an SEA?', the 'need for a SEA', the 'need for consultants', and the 'role of actors in a SEA'. Within each of these master categories, statements from the transcripts were cut and pasted into the appropriate category in a new document. The statements were then grouped based on similarity into several sub-categories within the master categories. This process is referred to as splitting or 'axial coding' (Crang 2005; Kitchin and Tate 2000; Dey 1993). For example, the master category of 'what is an SEA?' included the sub-categories the 'SEA as a decision making tool', the 'carrying capacity of the environment for development', the 'need to balance brown and green issues', and the 'need to be strategic'. These sub-categories were identified as the story lines which the respondents employed. It is important to note that during the classification stage all the narratives were coded so as not to lose or sever the link with its original source. The purpose of coding the data is not to develop an explanatory framework, but to organise the data in such a way that the relationships between the data can be examined at a later stage.

The second step of this phase is to identify the policy vocabularies which policy makers conspicuously use in the KwaDukuza and Rustenburg SEAs. Within each SEA, particular concepts that featured prominently, such as 'sustainable', 'ecological' or 'development' were identified and highlighted. The number of times that they were used within the SEAs was also recorded. All the derivatives of the concept were also included into this count. For example, the count of the concept of 'development' would include all its derivatives of the term development, such as the terms; 'develop', 'developer' or 'developed'. The context in which the concepts were used was also highlighted in the transcripts so that the interpretation could identify the most common ways in which that particular concept had been used. For example, the most common way in which the 'development' concept was used is in the terms 'development plan', 'development framework', and 'sustainable development'. The concepts were then grouped into master categories based on their similarity. The master categories were identified as the policy vocabularies which the public officials, environmental consultants, and key stakeholders used in the KwaDukuza and Rustenburg SEAs. Three policy

vocabularies were identified. These are the 'developmental' policy vocabulary, 'management' policy vocabulary, and 'environmental' policy vocabulary.

Based on the story lines which were identified in the oral data collected from the interviews and policy vocabularies embedded in the three SEAs, a single discourse was identified. The 'ecological modernisation' discourse was found to frame both the KwaDukuza and Rustenburg SEAs.

The second phase of classification focuses on the performative dimension of the SEA policy process. The performative dimension consists of four concepts; scripting, staging, setting, and performance. These concepts were used to form the master categories. Within the interview transcripts, statements which relate to the master categories were highlighted, cut, and pasted into the appropriate category in a new document. The statements within the master categories were then grouped based on similarity to form several sub-categories. For example, the scripting master category was split into two sub categories; 'scripts', and 'actors'. All the statements were coded so that the source and context was not lost.

'Connection' is the final stage of the Dey (1993) qualitative approach and focuses on identifying and understanding the relationships and associations between the different statements which were identified and classified in the 'description' and 'classification' stages (Kitchin and Tate 2000; Dey 1993). Unlike the classification stage, the focus here is not on similarities and differences between statements, but the interactions between the various concepts. The stage focuses on the way in which the concepts within and between the discursive and performative dimensions of policy making interact with one another.

The connections between the discourses, story lines, and policy vocabularies of the discursive dimension of policy making are complex. Discourse represents the mix of ideas or concepts which actors use to shape and interpret the environmental problems which they are faced with. In the context of this research, story lines represent a condensed set of statements which actors use to frame a discussion within a specific discourse. Policy vocabularies can be seen as a group of concepts which actors conspicuously use in policy to frame the policy within a specific discourse. However, these discursive concepts of policy making do not take place within a vacuum, but within a particular set of practices (Hajer 2006; 2005a; 1995). There are several connections which were identified and interpreted between the discursive concepts of the SEA policy processes and the performances through which these processes take place. This is because the four concepts of the performative

dimension of policy making, namely scripting, staging, setting, and performance, affect the way in which the discourses of the SEA policy processes are produced, reproduced, and transformed.

Due to the qualitative nature of this research several challenges were encountered in collecting and interpreting the data. Although some of these challenges have already been discussed in terms of the methodological approaches, the following section outlines the major limitations that were encountered.

4.8 Challenges

Researchers often encounter several challenges in the collection and interpretation of qualitative research as research is often not conducted under ideal circumstances. The following section outlines three major challenges which were encountered in this research. The challenges are subjectivity, positioning, and scope.

Subjectivity

The first challenge which was encountered is often referred to as subjectivity (Valentine 2005; Cloke *et al*. 2004; Kitchin and Tate 2000; Thomas 1995). Due to the qualitative nature of this research, the researcher needs to constantly be aware of their role in the co-construction and interpretation of the data. This is because interviews are complex, inter-subjective, social interactions in which the researcher briefly becomes a part of the respondents' world. However, Valentine (2005) argues that all research is inherently subjective because data collection is explicitly or implicitly informed by the experiences, aims, and interpretations of the researcher. This is the reason that Mottier (2005) argues that interpretive approaches view subjectivity as a crucial part of qualitative research. This is in contrast to positivist approaches which assume that subjectivity can be separated from research (Mottier 2005; Wagenaar and Cook 2003). Subjectivity is therefore viewed as a challenge in this research because it is important for the researcher to be aware that the data is co-constructed and that the researcher is not independent of the data collection process.

Positioning

From an interpretive perspective, qualitative research recognises that data collection is not a passive extraction of information, but mutually constructed between the researcher and respondent (Mottier 2005). This is the reason that Visser (2001) argues that the researcher needs to constantly be aware of the way in which their identity, the image that they portray, and the status that they hold influences the data collection process. In the context of this research, a reversal of the traditional power relationship between the respondent and the interviewer was encountered. This is because the majority of the data was collected through what Hertz and Imber's (1995) refer to as 'interviewing the elite'. In most qualitative research, the interviewer is seen as being in a dominant position during the interviews (Valentine 2005; Cloke *et al* 2004). However, respondents in this study can be seen as being in more dominant position for a number of reasons, such as age and experience. As the research involved interviewing several professionals or specialists, Hertz and Imber's (1995) '*Studying Elites Using Qualitative Methods*' was used as guideline to highlight the important aspects that needed to be considered during the interview process. There were three particular challenges that were focused on; gatekeepers, settings, and power relations.

The first challenge which was encountered was the presence of gatekeepers which prevent access to individuals or organisations (Thomas 1995). To a large extent this limitation was overcome through networking or using personal contacts to gain access to individuals or organisations that might have been otherwise inaccessible (Hirsch 1995). It was also found that respondents are more open and trusting because the researcher has been referred by someone or an organisation that they are familiar with. However, it was important to recognise that access to the respondent does not necessarily mean that the researcher has access to the data which they need (Ostrander 1995). Although the researcher generally holds the power in that they choose what questions to ask, how to ask them, and how the data is analysed, respondents also hold power in that they control access to knowledge, and what information they share or choose to exclude. This is because two dimensions exist; the front-stage and the back-stage (Ostrander 1995). The front-stage represents information that is easily accessible to the researcher, such as public meetings or workshops. The back-stage is the area which researchers concentrate on and is often far less accessible, such as the steering committee meetings and private discussions.

The second challenge which was encountered is the setting of the interviews (Thomas 1995; Hunter 1995). The majority of the interviews took place at the respondents' offices. This was problematic

because the interviews were more formal than they may have been in a more comfortable setting and the respondents had greater control of the interview because the interviewer was in an unfamiliar setting. This problem was largely overcome by being well-prepared and knowing as much as possible about the project before the interview. The problem was also overcome by laying out the ground-rules before the interview, so that neither the respondent nor the interview had any assumptions about the rules (Hirsch 1995; Ostrander 1995; Thomas 1995). However, it was found that often the rules emerged through negotiation during the interaction itself.

The final challenge relates to the power relations between the interviewer, the respondent, and the respondents' context (Hirsch 1995; Ostrander 1995; Thomas 1995). The context was found to be important as it influenced not only the power structures, but the issues that were raised as well. For example, the public officials were found to be strongly influenced by the other spheres of government, environmental consultants, and key stakeholders. It was also found that the specialists were able make the interviewer feel comfortable by being warm, friendly and open, but at the same time intimidating because they are perceived as always being right and in control.

Scope

The final challenge is the scope of the study. Due to time constraints, respondents were limited to those directly involved in the project, which limited the variation in the data. The number of interviews and quality of the interviews were also affected by the amount of support that respondents had for the project and the short period over which the interviews had to be conducted. Another limiting factor was that this research only represents a snapshot of the process as the researcher was not involved in either project from start to completion. The researcher was not involved in the Rustenburg SEA policy processes because both projects were completed before the start of this research. The researcher was also not involved in the KwaDukuza SEA policy process because the project was in the initial stages and had not yet been completed. The interview process was also limited by the distance to the study areas, as they both involved different degrees of travelling.

4.9 Conclusion

The theoretical and methodological approach of this research is based on the approach of discourse analysis. Discourse analysis is an interpretive approach which emerges from the philosophy of social

constructivism. Social constructivist approaches recognise that language is not a transparent medium of communication, but embedded with meaning which actors use to construct their social reality. Discourse analysis is a specific interpretive approach which can be applied to examine the meaning which actors use to interpret environmental problems. This research adopts an interpretive approach because of several criticisms of the positivist approach to policy analysis, such as the assumption that knowledge creation is independent of politics.

This research adopts Hajer's (2006; 2005a) 'three-dimensional analytical model' as it provides an effective approach to discourse analysis which is used to fulfil the overall aim and objectives of this research. The analytical model that was applied consists of two dimensions. These are the discursive and performative dimensions of policy making. Within the discursive dimension of policy making, three concepts are used to interpret the language used in the KwaDukuza and Rustenburg SEA policy processes. These concepts are discourse, story lines, and policy vocabularies. Within the performative dimension, four concepts are used to examine the performance of the KwaDukuza and Rustenburg SEAs. The four concepts are scripting, staging, setting, and performance.

The primary data sources for this research included legislation, policy documents, such as the SEAs, and oral evidence collected from the interview process. A purposive sampling method and snowballing sampling technique was used to compile an interview schedule. The schedule consisted of public officials, environmental consultants, and key stakeholders involved in the KwaDukuza and Rustenburg SEAs. A semi-structured interview guide approach was used to structure the interview process because it provides comparability and flexibility for pursuing particular avenues of inquiry. The secondary data sources for this research included books, journals, and unpublished thesis. These data sources were used to develop the theoretical framework of this research and contextualise the oral data collected from the interviews.

The oral data collected from the interviews and KwaDukuza and Rustenburg SEA documents were interpreted using Dey's (1993) 'omelette' approach. This qualitative approach consists of three stages; description, classification, and connection. This research adopts this approach because the interpretation does not only focus on the similarity or differences in the data, but the connections between the data. However, there are several challenges associated with qualitative research and there are three challenges which were encountered in this research. These challenges are subjectivity, positioning, and scope.

CHAPTER 5: THE DISCURSIVE DIMENSION OF POLICY MAKING

5.1 Introduction

A Strategic Environmental Assessment (SEA) provides a strategic decision making framework for municipalities to integrate environmental considerations into policy making and planning processes. A SEA is considered a complex environmental management tool due the vagueness over its definition, diverse contexts in which it is applied, and strategic nature (Retief *et al*. 2007a; DEAT 2006; 2004b). This is the reason that in South Africa there is a strong reliance on the private sector in SEA practice as environmental consultants have the necessary resources, expertise, and experience (Retief *et al*. 2007b). The aim of this research is to use a discourse analysis of the KwaDukuza and Rustenburg SEAs to understand the role of environmental consultants in municipal environmental decision making processes. In order to achieve this aim, a discourse analysis is used to examine the language used in and performances of the SEA policy process.

Chapter five is the first of two chapters which present the results of this research. While Chapter five focuses on the language or discourse used in the KwaDukuza and Rustenburg SEAs, Chapter six focuses on the performative dimension of the SEA policy processes. This research uses three concepts, namely discourse, story lines, and policy vocabularies, to examine the language which actors used to define, interpret, and determine legitimate solutions to a specific environmental issue (Hajer 2006; 2005a; Dryzek 1997). Language is an important unit of analysis as it is not merely a transparent medium for communication, but shapes the way in which actors interpret reality (Fairclough 2003; Terre Blanche and Durrheim 1999; De Beaugarde 1997; Van Dijk 1997).

Section 5.2 presents the discourses which frame the KwaDukuza and Rustenburg SEAs and structures the way in which the public officials, environmental consultants, and key stakeholders approach environmental issues in the policy process. Section 5.3 discusses the story lines which are used as a rhetorical device to frame discussions and deliberations within the discourse of 'ecological modernisation'. This section describes the story lines, the statements which support them, and their influence on the policy process. Section 5.4 presents the policy vocabularies which are embedded in the SEA to frame the policy document within the discourse of 'ecological modernisation'. This section discusses the policy vocabularies, the words or concepts that make up these vocabularies, and their influence on the policy process.

5.2 The Discourse of 'Ecological Modernisation'

The current changes taking place in South Africa, especially at the local level, has ushered several discourses into the political arena. Bond (1999) identified three discourses which have emerged since 1994; 'orthodox economic growth', 'ecological modernisation', and 'environmental justice'. These discourses evident in South Africa reflect many aspects of the global environmental discourses presented by Dryzek (1997). These global discourses include 'survivalism', 'environmental problem solving', 'sustainability', and 'green radicalism'. Although many aspects of these discourses emerged from the interpretation of the KwaDukuza and Rustenburg SEAs, only one discourse dominated the policy processes. This is the discourse of 'ecological modernisation'.

The 'ecological modernisation' discourse represents the ensemble of ideas, concepts, and categorisations which actors used within KwaDukuza and Rustenburg SEAs to give meaning to environmental issues. It is a discourse that presents a particular understanding of the relationships between society and the environment (Oelofse *et al*. 2006; Dryzek 1997; Christoff 1996). In the context of the KwaDukuza and Rustenburg SEAs, the 'ecological modernisation' discourse is a product of the epistemic notion or discourse of 'sustainability'. Although epistemic notions are beyond the scope of this research, the notion of sustainability is a pervasive national discourse that plays an important role in structuring the thinking of actors involved in the policy processes of these two municipalities. These epistemic notions "structure the understanding of reality without actors necessarily being aware of it" (Hajer 2003: 106). Sustainability represents the broad notion that the conflict between economic and environmental interests can be dissolved through the normative concept of sustainable development (Dryzek 1997).

In contrast to the discourse of 'sustainable development' and following within the broader discourse of 'sustainability', the discourse of 'ecological modernisation' presents a more focused strategy to dissolve the conflict between development and environmental protection. The KwaDukuza and Rustenburg SEAs are "decision-support tool(s)" which are used to achieve the goals of ecological modernisation (Interview 3, Rustenburg 1). The SEAs attempt to restructure the political-economy by making decision making more strategic, balancing competing economic, social, and environmental interests, and taking into account the carrying capacity of the environment for future development (Christoff 1996). The SEAs thus attempt to restructure the local political-economy along environmentally sensitive lines.

However, the KwaDukuza and Rustenburg SEAs reflect aspects of both weak ecological modernisation and a shift to strong ecological modernisation. Oelofse *et al*. (2006) and Christoff (1996) argue that the characteristics of 'weak' ecological modernisation are environmental policies that remain largely economic, technological, instrumental, technocratic, and on a national scale. In contrast, the characteristics of 'strong' ecological modernisation are policies that are ecologically based, institutional, deliberative, and international in scale. The SEAs are considered an example of weak ecological modernisation because they are largely technocratic, take an instrumental view of the environment, and support economic interests. The SEAs were also considered in some aspects as showing evidence of strong ecological modernisation because they were to some extent ecologically based and encourage deliberation. The following section on story lines presents the evidence to show the strong and weak aspects of ecological modernisation which are evident in the KwaDukuza and Rustenburg SEAs policy processes.

5.3 Story Lines

The story lines presented in this section support 'ecological modernisation' as the framing discourse of the KwaDukuza and Rustenburg SEAs. These story lines represent the rhetorical devices which actors use to express the 'ecological modernisation' discourse in policy discussions. Actors use these story lines to express the way in which they interpret reality and give meaning to particular social and physical objects, and events. Story lines act as common ground in policy discussions to which actors are able to attach their own experiences and previously unrelated information (Hajer 1995). A story line is therefore a condensed narrative which is supported by several previously unrelated policy statements. Actors use story lines to position themselves and others within specific discourse coalitions (Hajer 2003).

In order to examine the story lines used in the KwaDukuza and Rustenburg SEAs, a deductive approach based on four themes was adopted. These themes were based on the research objectives which set out to identify the meaning embedded in language and role of environmental consultants in the SEA policy processes. The first two themes focus on the language or discourse used by the actors to interpret the KwaDukuza and Rustenburg SEAs. The first theme is 'what is a SEA?' and focuses on the story lines which reflect the actors' interpretations of the outcome of the SEAs (Refer to Section 5.3.1). The second theme is the 'need for a SEA' and provides the evidence to justify undertaking a SEA (Refer to Section 5.3.2). The second two themes focus on the aim of this research

which is to understand the role of environmental consultants in the KwaDukuza and Rustenburg SEAs. The story lines in the 'need for consultants' theme provides evidence to justify the commissioning of environmental consultants to undertake the SEAs (Refer to Section 5.3.3). The final theme is the 'role of actors in a SEA' and focuses on story lines which describe the role of the public officials, environmental consultants, and key stakeholders in the KwaDukuza and Rustenburg SEAs. The discussion on each story line describes the story line, the statements which support the story line, and which aspects of the discourse of 'ecological modernisation' the story line expresses.

5.3.1 What is a SEA?

The first broad theme is 'what is an SEA?' This theme was included because it is important to examine the actors' interpretation of the outcomes of the KwaDukuza and Rustenburg SEAs as this shapes the policy process. Four story lines within this theme have been identified. These are the 'SEA as a decision making tool', the 'carrying capacity of the environment for development', the 'need to balance brown and green issues', and the 'need to be strategic'.

The 'SEA as a Decision Making Tool' Story line

The first story line is the 'SEA as a decision making tool' and refers to a SEA as a tool for informing municipal officials in environmental decision making. This story line is supported by several statements and was used by 11 of the 14 respondents.

This story line indicates that there are two aspects to a SEA. Firstly, a SEA is seen as a "guiding tool" (Interview 1, Rustenburg 2), "decision making tool" (Interview 2, Rustenburg 2), or "framework" (Interview 4, KwaDukuza) for making "informed decisions" (Interview 3, Rustenburg 2). However, a respondent from the Rustenburg 1 SEA argues that it is important to recognise that a SEA "is not a decision", but a "policy" which informs municipal decision making (Interview 3, Rustenburg 1). The KwaDukuza and Rustenburg SEAs can therefore be seen as a "planning tool" which the municipalities can use to assess future development applications (Interview 4, KwaDukuza). It is interesting to note that the statement which describes a SEA as a "decision support tool" (Interview 3, Rustenburg 1; Interview 2, Rustenburg 2) was used by two different respondents from two different projects. This reflects a similarity in thinking about a SEA which is largely influenced by the discourse of 'ecological modernisation' and embedded in legislation and literature on SEA practice.

The literature often describes as a SEA as an environmental management tool which is used to inform strategic level decision making (Chaker *et al*. 2006; DEAT 2006; 2004b; NWPG 2004). A SEA supports decision making by providing a framework which integrates sustainability into decision making processes.

Secondly, a SEA is viewed as a tool to assist decision makers because there is "not adequate information or resources or mechanisms in place at local and provincial level to guide spatial planning in development" (Interview 3, Rustenburg 1). One of the main objectives of the KwaDukuza and Rustenburg SEAs is to "help the municipality in terms of planning" (Interview 5, Rustenburg 2). Some of the respondents felt that the municipalities needed a tool to "fast track" or "expedite decision making" (Interview 5, KwaDukuza). DEAT (2004b) and Fischer (2003) argue that a SEA is often used to streamline the EIA application process by broadening the range of alternatives, integrating the cumulative effects into the assessment, and setting a limit of acceptable environmental change. The KwaDukuza and Rustenburg SEAs therefore provide "a uniform platform" for "the local municipality to make informed decisions on development applications" (Interview 3, Rustenburg 2). For example, in the Rustenburg 1 SEA the study area was divided into three control zones; high, medium, and low, based on several factors, such as proximity to protected areas, slope, and current land-use (NWPG 2004). For each of these three control zones, the Strategic Environmental Management Plan (SEMP) outlines what types of development are permitted and what the development restrictions are. The Rustenburg 1 SEA thus provides a tool which incorporates all the necessary information into a framework for informing and expediting municipal environmental decision making.

The 'SEA as a decision making tool' story line supports the 'ecological modernisation' discourse as the discourse which frames the KwaDukuza and Rustenburg SEAs. This is because a SEA represents a focused and holistic strategy for integrating environmental interests into development. This story line reflects the characteristics of both weak ecological modernisation and a shift to strong ecological modernisation. This story line is characterised by a strong 'ecological modernisation' discourse as a SEA is an ecologically based approach. A SEA is a strategic management tool which focuses on what constraints the environment places on development (DEAT 2006; 2004a; 2004b). This is in contrast to other management tools, such as Environmental Impact Assessment, which only focuses on the impacts of development on the environment.

However, this story line also reflects elements of weak ecological modernisation as the SEA process is largely technocratic (Christoff 1996). This story line is viewed as technocratic as it supports the

central role of the state and experts in the development and implementation of a SEA (DEAT 2006; 2004a). This story line does not reflect the shift taking place in environmental policy making from government to governance in which non-state actors meaningfully engage in the policy process (Axtmann 2004; Macleod and Goodwin 1999). The story line is also technocratic as it supports the hierarchal decision making structure in which the state makes the final decisions regarding environmental problems. This is in contrast to the democratic and open policy networks of strong ecological modernisation in which the state and non-state actors deliberate over the definition of and solutions to environmental problems (Bulkeley 2005; Karkainen 2004; Hajer and Wagenaar 2003). Dryzek (1997) refers to the situation in which government and experts dominate decision making processes as 'administrative rationalism'.

The 'Carrying Capacity of the Environment for Development' Story line

The next story line is the 'carrying capacity of the environment for development'. This story line refers to a SEA ensuring that scale and type of development does not exceed what the environment can carry. This is one of the most significant differences between a SEA and an EIA. While an EIA focuses on "positive and negative impacts of a specific development project" (DEAT 2004b: 2), a SEA "proactively determine the most suitable development type for a particular area" (DEAT 2004b: 3). Therefore, a "SEA identifies opportunities and constraints which the environment places on the development of plans and programmes" (DEAT 2004b: 7). This story line was used by eight of the 14 respondents and indicates that there is some similarity in the way actors conceptualise the relationship between development and the environment.

The 'carrying capacity of the environment for development' story line recognises that the environment has a finite carrying capacity and that this should determine not only how much development is acceptable, but what type of development is appropriate. This story line reflects the characteristics of Dryzek's (1997) 'survivalism' discourse as it recognises that the current rate of population growth and development can not be sustained in the future. Many of the respondents felt that in some cases development in the KwaDukuza and Rustenburg "weighs more than the environment can offer" (Interview 1, Rustenburg 2). The respondents stated that a SEA was needed as the "environment can dictate" what level of development is appropriate (Interview 3, Rustenburg 2). The respondents indicated that the environment "should have the carrying capacity (to) support that development" (Interview 1, KwaDukuza). A SEA therefore provides a justification for decision

makers to turn down development applications "because the environment cannot support it" (Interview 1, KwaDukuza).

The 'carrying capacity of the environment for development' story line also recognises that "you must know what you have" in order to determine the carrying capacity of the environment (Interview 3, Rustenburg 2). Many of the respondents felt that the *status quo* assessment of the KwaDukuza and Rustenburg SEAs was a way in which the municipality "can take stock of" the environmental resources they have in the area (Interview 4, KwaDukuza). The municipality can then identify the pressures on those resources and "put in place mechanisms and guidelines to reduce those pressures" (Interview 4, KwaDukuza). A SEA therefore provides a framework based on the resources of the area which draws a "line" between where development can take place and where it can not (Interview 3, Rustenburg 1). In the Rustenburg 1 SEA, this line was determined by the boundary of the Kgaswane Mountain Reserve and Magaliesberg Protected Natural Environment. This line separated these protected areas from the development taking place in Rustenburg (RLM 2003).

The 'carrying capacity of the environment for development' story line reflects a weak 'ecological modernisation' discourse and some aspects of a shift to a strong 'ecological modernisation' discourse This story line is considered characteristic of a weak 'ecological modernisation' discourse as it reflects an instrumental view of the environment (Christoff 1996). The environment is viewed from a promethean perspective as a resource base (Hallowes and Butler 2002; Dryzek 1997). For example, a respondent from the Rustenburg 2 SEA describes the Rustenburg Municipality as "a very rich area from a resources point of view" (Interview 2, Rustenburg 2). This is because the municipality has growing mining industry and contains three of the world's largest platinum mines (RLM 2006). However, this story line also reflects the characteristics of strong ecological modernisation. This is because carrying capacity is an ecologically based concept which is supported by the principles of 'sustainability' (Sowman 2002; Baker *et al*. 1999; Dryzek 1997). These principles emphasise maintaining equilibrium between resource use and resource availability. The aim of a SEA is therefore to determine the opportunities and constraints that the environment places on development.

The 'Need to Balance Brown and Green Issues' Story line

The 'need to balance brown and green issues' story line refers to the classic conflict between development and the environment. This story line reflects the core principle of the epistemic notion of

'sustainability' which is to balance the conflict between economic and environmental interests (Baker *et al*. 1999; Haque 1999; Dryzek 1997; Pearce 1993). The IEM SEA Guidelines (2004) describe a SEA as "a process of integrating the concept of sustainability" into the policy and planning process (DEAT 2004b: 7). Many of the respondents describe a SEA as a way of "making development sustainable" (Interview 6, KwaDukuza) or "something that will guide us to sustainable development" (Interview 4, Rustenburg 2). This story line was used by eight of the 14 respondents and indicates that there is a similarity in the way the actors conceptualise the relationship between economic growth and the environment in the KwaDukuza and Rustenburg Municipalities.

The 'need to balance brown and green issues' story line emphasises that a SEA needs to integrate "environmental issues into planning" (Interview 5, Rustenburg 2). A respondent from the KwaDukuza SEA stated that a SEA was undertaken to "address (the) planning imbalances" in the KwaDukuza Municipality (Interview 4, KwaDukuza). A SEA would allow public officials to effectively manage development and ensure it does not "impact (on) the environment negatively" (Interview 1, KwaDukuza). This story line emphasises that actors need to "make sure everything is included in their planning" (Interview 4, Rustenburg 2). A SEA can therefore provide "as much information as possible" in "a usable format" to decision makers (Interview 3, Rustenburg 1).

However, this story line does not support environmental interests at the expense of economic or social interests. It emphasises the "three pillars" of sustainability and "not just (the) biophysical" environment (Interview 2, KwaDukuza). The actors which use this story line recognise that there needs to be a "balance between the brown and the green" issues (Interview 3, Rustenburg 2). A SEA needs to ensure that environmental issues "balance out with all types of other issues" (Interview 2, Rustenburg 1). This reflects characteristics of a shift towards a strong 'ecological modernisation' discourse as the story line does not view economic and environmental interests as being in conflict, but mutually reinforcing (Dryzek 1997).

The 'Need to be Strategic' Story line

The final story line of the 'what is a SEA?' theme is the 'need to be strategic'. This story line was used by nine of the 14 respondents and supports a pro-active approach to managing development to ensure that it does not impact on future generations.

The strategic nature of a SEA is another significant difference between a SEA and an EIA. While the EIA is "reactive to a developmental proposal" (DEAT 2004b: 5), a SEA is "proactive and inform(s) development proposals" (DEAT 2004b: 5). This is the reason that the KwaDukuza and Rustenburg SEAs were described as "strategic document(s)" (Interview 3, Rustenburg 1) which gives the municipalities a "strategic direction" (Interview 3, Rustenburg 2). A respondent from the Rustenburg 2 SEA stated that the Rustenburg Municipality made the decision to undertake a SEA because there needed to be "some kind of pro-active thinking about issues" (Interview 4, Rustenburg 2). A respondent from the KwaDukuza SEA stated that the KwaDukuza Municipality made the decision to undertake a SEA because the municipality needed to be pro-active "instead of being re-active" (Interview 1, KwaDukuza). This is the reason that SEAs cannot be seen as "big EIAs" (Interview 2, KwaDukuza). One of the respondents felt that the strategic nature of a SEA is often neglected. They felt that "the focus of an SEA has been lost in terms of what people do; what specialists do" (Interview 3, Rustenburg 1).

The 'need to be strategic' story line emphasises that a SEA needs ensure that the environment and its resources are "protected for future generations" (Interview 1, Rustenburg 2). For example, the first phase of the Rustenburg 1 SEA developed control zones. Conservation areas, such as the Magaliesburg Protected Natural Area, where classified as protected areas, while those areas bordering these areas were classified as high control zones. This was done to ensure that sensitive conservation areas are protected and the boundary impacts from the surrounding development are mitigated (NWPG 2004).

The 'need to be strategic' story line also emphasises that a SEA needs to ensure that the Rustenburg and KwaDukuza Municipality "set a vision" or a level of acceptable environmental change (Interview 2, Rustenburg 2). This gives the actors a goal to work towards through the various "strategies for the area" (Interview 2, Rustenburg 2). A SEA therefore provides an "overall picture (of) where (the) municipality (is) trying to go" (Interview 3, KwaDukuza). For example, the Rustenburg 1 SEA includes a Strategic Environmental Management Plan (SEMP) which outlines the vision of the area and various strategies that can be used to achieve and maintain the desired level of acceptable environmental change (NWPG 2004). A respondent from the Rustenburg 1 SEA stated that the aim of a SEA is to provide a framework to evaluate "future EIA applications" in the municipality (Interview 1, Rustenburg 1). In this way, decision makers are able to take "into account projected development plans" (Interview 6, KwaDukuza).

There are several aspects of the 'need to be strategic' story line which reflect a shift towards a strong 'ecological modernisation' discourse. Firstly, the story line emphasises a pro-active approach to managing competing economic, social, and environmental interests. The strategic nature of a SEA supports the principle of intergenerational equity which is inherent in the epistemic notion of 'sustainability' (Sowman 2002; Dryzek 1997). Secondly, many of the respondents emphasised the importance of public participation in the KwaDukuza and Rustenburg SEA when setting the vision for the area. The public officials and environmental consultants wanted to know from key stakeholders "where development was headed" so that they "could plan accordingly' (Interview 2, Rustenburg 1). The respondents emphasise that key stakeholders should "be apart of the strategy to take it (SEA) forward" (Interview 3, KwaDukuza). The participatory nature of the SEA policy processes reflects the deliberative and democratic qualities of strong ecological modernisation (Christoff 1996). This situation reflects the changes taking place in environmental policy making with the shift from government to governance and emergence of policy networks in which non-state actors, such as environmental consultants and key stakeholders, meaningfully engage in the policy process (Bulkeley 2005; Karkainen 2004; Hajer and Wagenaar 2003).

There are a number of story lines within the 'what is an SEA?' theme which reflect the way public officials, environmental consultants, and key stakeholders of the KwaDukuza and Rustenburg SEAs understand a SEA. These story lines indicate that a SEA is a decision making tool, which is strategic in nature, balances development and environmental interests, and ensures development takes place within the carrying capacity of the environment. These story lines reflect many of the characteristics and principles of a SEA which are discussed in the IEM SEA Guidelines (DEAT 2006; 2004b) and literature on SEA practice (Retief *et al*. 2007a; Fischer 2003). However, in order to understand what the outcome of a SEA is, it is important to determine why a SEA was needed in the KwaDukuza and Rustenburg Municipalities.

5.3.2 The Need for a SEA

The second broad theme is the 'need for the SEA' and focuses on the story lines which justify why the KwaDukuza and Rustenburg Municipalities made the decision to undertake a SEA. This theme contextualises the SEAs within the conditions that gave rise to the need for a SEA. There are three story lines within this theme and they are 'rapid municipal development', the 'impact of development on the environment', and the 'environment is marginalised in policy and planning processes'.

The 'Rapid Municipal Development' Story line

The dominant story line in the 'need for the SEA' theme which emerged from the interpretation of the KwaDukuza and Rustenburg SEAs is the 'rapid municipal development' story line. This story line refers to the rapid rate of development or "speed of light development" taking place in the KwaDukuza and Rustenburg Municipalities (Interview 1, Rustenburg 2). The Rustenburg Local Municipality is one of the fastest growing municipalities in the country with a 6% growth between 1996 and 2001 (RLM 2006; NWPG 2004). During this period the population increased from 311 000 to 395 000 and resulted in an increase in the demand for housing, services, and employment opportunities. This "spurt of development" (Interview 2, Rustenburg 1) or "development boom" (Interview 1, Rustenburg 1) is largely due to the growth in the platinum mining industry. The KwaDukuza Local Municipality is also experiencing a rapid rate of development. The development is largely up-market coastal residential estates and some light industry (KLM 2006). This story line was used by eight of the 14 respondents and indicates that more than half of the respondents share a similar justification for the Rustenburg and KwaDukuza Municipalities undertaking a SEA.

The 'rapid municipal development' story line indicates that both the KwaDukuza and Rustenburg Municipalities are "growing very rapidly" Interview 3, Rustenburg 2). This "surging" (Interview 4, KwaDukuza) of development in the municipalities is "increasing (the) pressure" on environmental decision making processes (Interview 3, KwaDukuza). A respondent indicated that it was this "development pressure" which "prompted the inception of the project" in the KwaDukuza Municipality (Interview 4, KwaDukuza). This is largely because nobody "could have foreseen the rate of development" the municipalities are experiencing (Interview 6, KwaDukuza).

However, it was noted that many of the public officials of both municipalities viewed the rapid rate of development as positive because of benefits, such as greater revenue through rates and taxes, and employment opportunities for the local community. This may be the reason that one of the respondents from the KwaDukuza SEA felt that a SEA was going to make very little difference to the rate of development despite the environmental controls. The respondent indicated that they get the "feeling of it is a done deal" when it comes to development as the municipalities were simply "playing lip service" to key stakeholders when it comes to EIA and SEA processes (Interview 6, KwaDukuza).

The 'rapid municipal development' story line reflects a weak 'ecological modernisation' discourse. This story line places a strong emphasis on economic growth and the benefits of development. Economic growth is seen as the only legitimate path of economic and social development (Dryzek 1997; Christoff 1996). This viewpoint is reflected in the statement by a respondent from the Rustenburg 2 SEA that "we have to develop the country" (Interview 2, Rustenburg 2). This is the reason some of the respondents felt that public officials and councillors are "always pro-development" (Interview 1, KwaDukuza). Bond (1999) argues that in South Africa the 'orthodox economic growth' is a prominent environmental discourse. Economic growth is one of the core imperatives of the modern state (Dryzek *et al*. 2003). The imperative of economic growth seeks to extract all the resources within a states territory and create favourable trade conditions for attracting domestic and international investment. This pro-development discourse however places "huge development pressures on the environment" (Interview 2, Rustenburg 1). One of the KwaDukuza respondents felt that "development has totally outstripped the sustainability of the area" (Interview 6, KwaDukuza). This transformation of the KwaDukuza coastline is increasing the pressure on the ecological processes of the area and undermines its attractiveness as a holiday destination (Tourism KZN 2005). The following story line focuses on the way in which the rapid rate of development in the KwaDukuza and Rustenburg Municipalities impacts on the environment.

The 'Impact of Development on the Environment' Story line

The 'impact of development on the environment' story line refers to the impact of the rapid municipal development on the environment in the KwaDukuza and Rustenburg Municipalities. This story line was used by eight of the 14 respondents.

There are two components of the 'impact of development on the environment' story line. Firstly, the story line refers to the loss of sensitive areas and natural resources in the KwaDukuza and Rustenburg Municipalities. The Rustenburg 1 SEA identified the development taking place on the Norite *koppies* as a serious problem because these areas are very rich in biodiversity and provide a natural habitat for several red data flora and fauna species (NWPG 2004). The Rustenburg Municipality made decision to undertake a SEA because there was a realisation that "development (was) taking place on sensitive areas" (Interview 2, Rustenburg 1). Development was taking place on the boundaries of the Magaliesberg Protected Natural Environment (MPNE) and Kgaswane Mountain Reserve "which is a relatively sensitive area" (Interview 1, Rustenburg 1). This is largely because "land-use planning" in Rustenburg "did not take into account the ecological sensitivities" of these areas (Interview 2,

Rustenburg 1). This is the reason that one of the respondents felt that Rustenburg needs "to mind the existing resources" (Interview 3, Rustenburg 2). The KwaDukuza SEA identified several remaining pockets of coastal forest in the KwaDukuza Municipality (KLM 2007). The protection of these remaining pockets of coastal forest is a key focus of the KwaDukuza SEA because the municipality did "not really have any to begin with" (Interview 2, KwaDukuza). "There were so few pockets" of coastal forest that the public officials, environmental consultants, and key stakeholders "could sit down and identify" during the scoping phase of the SEA (Interview 6, KwaDukuza). The protection of these "undeveloped" pockets of coastal vegetation is therefore a key focus of the KwaDukuza SEA (Interview 1, KwaDukuza).

Secondly, the 'impact of development on the environment' story line refers to the general "environmental degradation" in the KwaDukuza and Rustenburg Municipalities (Interview 4, Rustenburg 2). For example, the Rustenburg 1 SEA focuses on several environmental issues, such as noise pollution, light pollution, decrease in water quality, poor waste management, and decreasing air quality (NWPG, 2004). Many of the respondents in Rustenburg indicated that they were concerned with the "status of the (sensitive) areas due to degradation" (Interview 1, Rustenburg 2). The respondents felt that the Rustenburg Municipality is "environmentally speaking" a "very challenged area" (Interview 2, Rustenburg 2). A KwaDukuza respondent indicated that they "shudder" to think of "the impact of all this development down the line" (Interview 1, KwaDukuza).

The 'impact of development on the environment' story line recognises that there is a concern about the current rate of development and that it is impacting on the environment. The KwaDukuza and Rustenburg SEAs provide a framework for integrating the principles of sustainability and environmental considerations into future developments to mitigate the impacts of development on the environment. However, this story line reflects the characteristics of weak ecological modernisation as it is largely economic (Christoff 1996). Although this story line supports the integration of environmental considerations into development planning, it does not support the balancing of economic and environmental interests. This is because economic growth is a core imperative of the modern state and not open to the conflict and deliberation associated with peripheral imperatives, such as environmental protection (Dryzek *et al*. 2003). The following story line indicates that environmental interests tend to be marginalised in the KwaDukuza and Rustenburg Municipalities.

The 'Environment is Marginalised in Policy and Planning Processes' Story line

The final story line in 'the need for a SEA' theme is the 'environment is marginalised in policy and planning processes' story line. This story line refers to the way in which environmental issues are marginalised in the KwaDukuza and Rustenburg Municipalities.

Seven of the 14 respondents indicated that environmental considerations had not featured prominently in policy and planning processes at the KwaDukuza and Rustenburg Municipalities in the past. In the Rustenburg Municipality, this situation emerged as "there were not people or tools in place to help them (public officials) make decisions" (Interview 3, Rustenburg 1). Evidence from the interviews indicates that neither municipality had the institutional structures or people in place. Prior to the commissioning of a SEA in 2006, the town planning department and town planners of the KwaDukuza Municipality were responsible for making environmental decisions because there was neither an environmental department nor an environmental officer. Babu (2000) argues that this situation represents an inefficient use of the town planning department's resources. This situation is also not desirable as the town planning department may integrate its own departmental discourses into the development and implementation of environmental policies. It also appears that neither municipality had environmental policies or plans in place prior to the commissioning of a SEA. A respondent indicated that the Rustenburg Municipality had never "been subjected to any kind of an environmental management plan before" the commissioning of the Rustenburg 1 SEA in 2002 (Interview 1, Rustenburg 1). A respondent from the KwaDukuza SEA stated that municipal officials often "left out the environment in previous planning exercises" (Interview 3, KwaDukuza). This may be because "nobody saw the need for it" in the past, "especially in local government" (Interview 5, Rustenburg 2).

The 'environment is marginalised in policy and planning processes' story line reflects the characteristics of a weak 'ecological modernisation' discourse. This is because the story line emphasises the marginalisation of environmental interests in decision making processes (Christoff 1996). This story line does not support the assumption of ecological modernisation that economic development and environmental protection are complimentary and mutually reinforcing (Dryzek 1997). This story line is also in conflict with the principle of the epistemic notion of 'sustainability' which attempts to dissolve the conflict between competing economic and environmental interests. This is the reason that one of the respondents stated that "the environment is basically the weakest link" in municipal policy and planning processes (Interview 2, Rustenburg 2). This is because

development "will take place" even though it exceeds the carrying capacity of the environment (Interview 1, Rustenburg 2). Statements such as this contradict the Constitutional mandate that every policy, programme, and plan should "secure ecologically sustainable development" (RSA 1996: 1253).

The story lines in the 'need for a SEA' theme justify the undertaking of SEAs in the KwaDukuza and Rustenburg SEAs. These story lines indicate that the SEAs were commissioned because of the rapid municipal development, the impact of development on the environment, and the marginalisation of environmental interests in policy and planning processes. However, several factors, such as capacity constraints, prevent local government from effectively integrating environmental considerations into their policy and planning processes. The following 'need for consultants' theme discusses story lines which justify the appointment of environmental consultants to undertake the KwaDukuza and Rustenburg SEAs.

5.3.3 The Need for Consultants

The third broad theme is the 'need for the consultants' and contains story lines which explain why environmental consultants were commissioned to undertake the KwaDukuza and Rustenburg SEAs. As the aim of this research is to understand the role of environmental consultants in the KwaDukuza and Rustenburg SEA policy processes, it is important to understand the motivating factors for using external consultants. These motivating factors are articulated within three story lines. These story lines are the 'lack of capacity in local government', the 'environmental consultants are specialists', and 'the lack of accountability in government'.

The 'Lack of Capacity in Local Government' Story line

The first story line in the 'need for the consultants' theme is the 'lack of capacity in local government'. This story line refers to the lack of capacity in local government to effectively integrate environmental issues into policy and planning processes. Due to the lack of capacity, environmental protection is often at the expense of the rapid development in the KwaDukuza and Rustenburg Municipalities. This was the consensus among all the respondents as all 14 of them used this story line when describing the relationship between development, the environment, and local government.

There are three aspects to the 'lack of capacity in local government' story line. The first aspect of this story line refers to the capacity challenges facing local government. These capacity challenges are a lack of institutional capacity and individual capacity which are defined in Section 3.3.3. The majority of respondents, especially public officials, argued that the capacity challenges were largely structural problems. These respondents stated that "the structures are (not) in place" because many of the municipalities "do not even have environmental sections" (Interview 1, Rustenburg 1). The KwaDukuza Municipality has only recently appointed an environmental officer and are still in the planning stages of putting together an environmental department. One of the respondents felt that "most of the municipalities *per se*, do not even have attached environmental people *per se*" (Interview 3, Rustenburg 2). This respondent was referring to the "misconception" that local government "does not have the expertise" (Interview 3, Rustenburg 2). It is not a lack of "individual capacity" (Interview 5, Rustenburg 2), but a lack of "warm bodies in the building" (Interview 3, Rustenburg 2). This is because there are "a few skilled people who can actually do the job" and many of the other public officials "can be empowered" (Interview 4, Rustenburg 2). This is reason that many of the respondents agreed that the main capacity challenge is "a lack of manpower" (Interview 5, Rustenburg 2) as "local government does not have enough staff" (Interview 1, Rustenburg 2).

However, some of the respondents indicated that the capacity challenge facing the KwaDukuza and Rustenburg Municipalities is the result of a lack of individual capacity. A respondent felt that some of the public officials do not have the "expertise", "training" or "experience" to effectively deal with the impact of development on the environment in the Rustenburg Municipality (Interview 3, Rustenburg 1). A respondent from the KwaDukuza SEA felt that the KwaDukuza Municipality did not have the "capacity and the people" (Interview 1, KwaDukuza). This is because the public officials do not have "knowledge or the training" (Interview 6, KwaDukuza). This is the reason that some of the respondents felt that it was important to train all public officials, such as town planners, on environmental issues as this would streamline the policy process because all the actors would then have some understanding of the environmental issues (Interview 1; KwaDukuza; Interview 4, KwaDukuza).

The second aspect of the 'lack of capacity in local government' story line refers to the way in which "in-house capacity is breaking" in the KwaDukuza and Rustenburg Municipalities (Interview 4, Rustenburg 2). This statement metaphorically describes how the capacity challenges facing local government are not improving and in some cases getting worse. A respondent from the Rustenburg SEA described "capacity within (local) government" as being "very, very weak" (Interview 4,

Rustenburg 2). A number of the respondents supported this story line as there is a "the lack of capacity" (Interview 1, Rustenburg 1; Interview 5, KwaDukuza) in local government or local government "do not have the capacity" (Interview 1, KwaDukuza; Interview 2, KwaDukuza). A respondent from the KwaDukuza SEA indicated that the KwaDukuza Municipality never had 'the environmental capacity before" the appointment of an environmental officer in 2007 (Interview 3, KwaDukuza). A respondent from the Rustenburg SEA felt that local "government (will) always have capacity constraints" as they "never have enough staff or time to do things" (Interview 1, Rustenburg 1).

The respondents indicated that the lack of capacity in local government is largely the result of losing skilled and experienced staff to other municipalities and the private sector. The Rustenburg Municipality has a problem with the "private sector poaching" the "specialists that work for government" (Interview 1, Rustenburg 2). In the KwaDukuza Municipality, specialists move to other municipalities and the private sector when they "get enough experience" as they want to "better themselves" (Interview 4, KwaDukuza). This creates a "vicious cycle" because as soon as local government trains someone or they get enough experience they leave (Interview 1, KwaDukuza). This creates a challenge for local government as those people take their "institutional memory" with them (Interview 3, Rustenburg 2). This situation has created a "critical issue" for the Rustenburg Municipality which they have not "been able to resolve" (Interview 2, Rustenburg 2).

One of the respondents raised an important question about the commissioning of environmental consultants by local municipalities. The respondent was querying why municipalities, such as Rustenburg "spend all this money" employing consultants "when they should do it in-house" (Interview 3, Rustenburg 1). Even larger municipalities, such as the Gauteng Metropolitan Municipality which has capacity, but still does not do its own projects. Many of the respondents agreed that local government should do their own projects. However, given the capacity challenges facing local government, public officials should manage the projects themselves and sub-contract specialist work to environmental consultants (Interview 3, Rustenburg 1). This is in contrast to the current situation in which environmental consultants manage the entire project. A respondent felt that "consultants should be appointed as sub-contractors to do part of the project" and "it should be more of a partnership than just dropping the project in the laps of the consultants without steering it" (Interview 3, Rustenburg 1). One of the respondents supported this view as the role of consultants is not to run the process, but to add their input and expertise (Interview 3, Rustenburg 2).

The final aspect of 'the lack of capacity in local government' story line refers to the capacity challenges created by the restructuring of local government. The role of local government has changed from being an instrument of segregation to a site for transformation, integration, and development (Lemon 2002; Pieterse 2002). However, these structural changes have left many local municipalities with both institutional and individual capacity constraints. There are several reasons why these capacity constraints still persist (Walmsley 2005; Cloete 2002). Firstly, during the transformation of local government many of the experienced and skilled staff left the municipalities creating gaps in the institutional structure. Secondly, many of the staff that remained in local government have struggled to adjust to their new roles in a developmental and transformative local municipality. A respondent from the KwaDukuza Municipality when referring to the changing role of local government noted that most environmental officers "came from a conservation background" and have a poor "understanding (of) the EIA process" because it is "a new thing" (Interview 2, KwaDukuza). Thirdly, many of the people that were employed to fill these structural gaps lack the skills and experience. For example, the KwaDukuza Municipality had a lot of difficulty in employing an environmental officer with experience and eventually "had to upgrade the post" to "attract the right calibre of person" (Interview 1, KwaDukuza). This is because municipalities, such as KwaDukuza "need somebody with experience" (Interview 2, KwaDukuza). This situation is exacerbated when municipalities employ people in the wrong positions. A respondent indicated that municipalities often do not "put experienced people in the right place so that they can make a difference" (Interview 6, KwaDukuza).

One of the main reasons for the capacity challenges facing local government is a lack of funding for environmental officers and departments. A respondent from the KwaDukuza Municipality indicated that public officials often have to "beg" to get the money from the municipality because "the councillors" do not always "understand what the project is about" (Interview 2, KwaDukuza). The respondent noted that public officials have "to speak the political language" to convince the councillors that projects, such as a SEA, are important (Interview 2, KwaDukuza). This is because the councillors have to balance environmental interests with "the influence of other sectors (Interview 6, KwaDukuza) and they have their "own priorities" (Interview 1, KwaDukuza). These priorities include reconstruction and development, effective service delivery, and creating favourable conditions for the economic sector (Lemon 2002). A respondent from the KwaDukuza SEA describes this situation as the "the constraints of officialdom" (Interview 6, KwaDukuza).

The 'lack of capacity in local government' story line exhibits characteristics of a weak 'ecological modernisation' discourse. This is because the story line emphasises the central role of the state in managing the impact of development on the environment (Christoff 1996). Dryzek (1997) refers to this technocratic approach to policy making as 'administrative rationalism' because the state and experts, such as environmental consultants, assume that environmental problems are too complex for the general public to understand. This is in contrast to the characteristics of strong ecological modernisation which support open and democratic deliberations over environmental issues. Hajer and Wagenaar (2003) argue that in situations of radical uncertainty when environmental issues are beyond the capacity of the state, government should engage with non-state actors in policy networks. Within these fluid networks the state and non-state actors are able to pool their resources, expertise, and experience within new collaborative institutional arrangements (Axtmann 2004; Karkkainen 2004; Connick and Innes 2003).

The 'Environmental Consultants are Specialists' Story line

The second story line within this the 'need for the consultants' theme is 'environmental consultants are specialists'. This story line refers to the commissioning of consultants for the KwaDukuza and Rustenburg SEAs because they are specialists and have the necessary expertise and resources. As this story line was used by 11 of the 14 respondents it indicates that the majority of the respondents share a similar conception of the value of environmental consultants.

The 'environmental consultants are specialists' story line indicates that there are two reasons that the KwaDukuza and Rustenburg Municipality commissioned environmental consultants to undertake the SEAs. Firstly, environmental consultants have a greater exposure to SEA policy processes, level of expertise, and ability to focus on environmental issues than public officials. The capacity constraints facing local government are evident in the 'lack of capacity in local government' story line. It was noted that environmental consultants are often "brought on board as specialists on projects of this kind of stature" (Interview 3, Rustenburg 1). This is largely due to the complexity of a SEA. The IEM SEA Guidelines (2006) recommend using environmental consultants because a SEA requires a variety of specialist skills which may not be available or fragmented across several government departments (DEAT 2006). This may be the reason that Retief *at al*. (2007a) found that none of the SEAs in South Africa commissioned by government have been conducted exclusively 'in-house'. One of the respondents stated that "it just made sense" to use environmental consultants on the

KwaDukuza SEA because of their "background and experience" (Interview 4, KwaDukuza). One of the respondents from the Rustenburg SEA stated that "you need specialists" and motivated that in some situations it is "quite useful to use consultants" (Interview 1, KwaDukuza).

There are several reasons why environmental consultants were commissioned to undertake the KwaDukuza and Rustenburg SEAs. Environmental consultants have a "different exposure" to and "different viewpoint" on specific policy processes and environmental issues which would add value to the project (Interview 2, Rustenburg 2). One of the respondents from the KwaDukuza SEA felt "totally over-awed with the qualifications that some of the consultants have got" (Interview 6, KwaDukuza). Environmental consultants are 'able to focus on the job" (Interview 2, Rustenburg 2) and "deliver on aspects as soon as possible" (Interview 3, Rustenburg 2). This is in contrast to public officials who "do not really seem to do as much specialisation" (Interview 2, Rustenburg 2). This may be the reason that environmental consultants have the ability to get "the job done right the first time" (Interview 2, KwaDukuza). A respondent from the Rustenburg SEA argued that environmental management has become "a professional field" and this is why the municipality needs to appoint "professional people" (Interview 3, Rustenburg 2). However, some of the respondents felt that not all environmental consultants are professionals. This is because there are "some very, very good consultants and there are some very, very poor consultants" (Interview 6, KwaDukuza). A respondent from the Rustenburg SEA felt that the municipality was justified in commissioning environmental consultants as long as the consultants are "are professional and they know what they are doing" (Interview 1, Rustenburg 2).

Some of the respondents however felt that the use of environmental consultants on projects, such as the KwaDukuza and Rustenburg SEAs, is not an ideal situation. This is because it is "necessary, but not desirable" (Interview 3, Rustenburg 2). A respondent from the Rustenburg SEA did not feel that the growing use of "outside consultants" is a "good idea" (Interview 4, Rustenburg 2). Some of the respondents from the KwaDukuza SEA argued that the use of environmental consultants is an "international" or "global thing" (Interview 6, KwaDukuza) and there appears to be no way "of running away from it" (Interview 1, KwaDukuza). The evidence therefore shows that while consultants are valued because of their expertise, there was opinion among some of the respondents that not all environmental consultants had this expertise.

The second reason that environmental consultants were commissioned to undertake the KwaDukuza and Rustenburg SEAs is because of their neutrality. A respondent from the KwaDukuza SEA stated

that environmental consultants bring "their impartiality" to the SEA policy process (Interview 6, KwaDukuza). A respondent from the Rustenburg SEA felt "the community will trust the (environmental) consultants" more than government "because they are neutral" (Interview 4, Rustenburg 2). There is also a growing recognition among environmental consultants that they "want to be seen as neutral" as possible (Interview 5, Rustenburg 2). In this way, environmental consultants can ensure that the SEA "is not bias(ed) in any way" (Interview 3, Rustenburg 1) and aligns with local government efforts to be legitimate, transparent, and accountable (Rossouw and Wiseman 2004).

The 'environmental consultants are specialists' story line reflects a weak 'ecological modernisation' discourse as it emphasises the central role of environmental consultants and to a lesser extent the state in the environmental policy process (Christoff 1996). This story line also exhibits an 'administrative rationalism' discourse as it supports decision making which is not based on democracy, but rational management (Dryzek 1997). In rational management, decision making processes organise scientific and technical specialists within a bureaucratic structure that provides the best available expertise to inform decision makers. This situation creates what Bäckstrand (2003) refers to as the 'politicisation of science' as the state uses the environmental consultants to add credibility and legitimacy to environmental policies. The excessive reliance of the state on environmental consultants can undermine the legitimacy of the consultants and erode the credibility of the role of science in the policy process. Bäckstrand (2003) and DEAT (2002) argue that the state can restore this trust and gain the support of key stakeholders for environmental policies through policy processes that are open-ended, efficient, and transparent. These institutional, communicative, and deliberative characteristics reflect a shift towards a strong 'ecological modernisation' discourse (Oelofse *et al*. 2006; Christoff 1996).

The 'Lack of Accountability in Government' Story line

The final story line within the 'need for consultants' theme is the 'lack of accountability in government'. Accountability refers to decision makers being accountable to political bodies and to the public at large for decision making (Hajer 2006; 2005a). This story line was only used by four of the 14 respondents and refers to the lack of accountability in all spheres of government in terms of environmental decision making. Although the story line was used by less than half of the respondents

and is therefore a minor story line, it represents an important justification for commissioning environmental consultants to undertake the KwaDukuza and Rustenburg SEAs.

The 'lack of accountability in government' story line indicates that government commissions environmental consultants to undertake SEAs because they are complex projects and to off-load responsibility for poor or controversial decision making. Environmental consultants are seen as accountable for the decisions made because they inform decisions making processes through the projects which they undertake, such as a SEA. A respondent from Rustenburg noted that one of the reasons environmental consultants were appointed for the Rustenburg SEA is "a matter of accountability" (Interview 3, Rustenburg 1). Public officials could then argue that they "never compiled" the SEA and that people should "go speak to the consultants" (Interview 3, Rustenburg 1). This may be the reason that public officials are unwilling to become involved or limit their involvement in projects, such as a SEA, as this limits their level of accountability. Evers and Menkoff (2004) and Blake and Mouton (1990) argue that environmental consultants are often appointed to add legitimacy to political as they off load accountability and responsibility from the decision makers. This situation is undesirable as it creates an imbalance in the policy making process because the accountability has been shifted from the decision makers to the consultants.

The 'lack of accountability in government' story line also refers to the lack of accountability within the spheres of government. One of the respondents felt that public officials that "work for government" sometimes feel like they "do not have support" (Interview 5, Rustenburg 2). The respondent was referring to support from their respective environmental departments or higher spheres of government for the decisions which they have to make. Public officials therefore have to "have a lot of guts to say no" to large developments (Interview 6, KwaDukuza). The respondents indicated that public officials need "someone to guide" (Interview 5, Rustenburg 2) them so that they do not feel that it is all up to them or that they are "alone" (Interview 2, KwaDukuza). The public officials would prefer "everybody backing" them up and indicating that they are "happy with the document (SEA)" (Interview 2, KwaDukuza). The lack of support poses a critical challenge for environmental decision making processes in local government. This situation may be particularly daunting for new, inexperienced members of staff who come under pressure from more qualified and experienced developers without the support of their department (Walmsley 2005; Cloete 2002).

The analysis reveals that the 'lack of accountability in government' story line exhibits characteristics of both weak ecological modernisation and a shift towards strong ecological modernisation. This

story line reflects characteristics of strong ecological modernisation as it emphasises the importance of the local level in decision making processes (Christoff 1996). This story line supports the decentralisation of decision making processes and autonomy of local government. This story line aligns with the autonomous role of local government as a sphere and not a level of government outlined in the Constitution of South Africa (Act 106 of 1996) (Buthelezi and Dollery 2004; RSA 1996). However, this story line also reflects a weak 'ecological modernisation' discourse as it shows that there is lack accountability among officials at the local level. Hajer (2006; 2005a) argues that accountability is one of six concepts which can be applied to a policy process to determine the deliberative or democratic quality of the process. These deliberative concepts are reciprocity, inclusiveness, openness, integrity, accountability, and dialogue. The lack of accountability reflects a weak democratic policy process and thus weak ecological modernisation.

The story lines within the 'need for consultants' theme justify the appointment of environmental consultants to undertake the KwaDukuza and Rustenburg SEAs. These story lines indicate that consultants were needed as there is a lack of institutional and individual capacity in local government, the consultant's expertise, experience and specialisation, and the absence of accountability in government. In order to understand the role environmental of environmental consultants in the SEA policy process, the following section focuses on the roles of public officials, environmental consultants, and key stakeholders in the KwaDukuza and Rustenburg SEAs.

5.3.4 The Role of Actors in a SEA

The final broad theme is the 'role of actors in a SEA'. This theme contains story lines which express the various roles played by public officials, environmental consultants, and key stakeholders in the KwaDukuza and Rustenburg SEAs. This theme aligns with the fourth objective of this research which is to understand the role of environmental consultants in environmental decision making processes. By interpreting the story lines of this theme, the role of environmental consultants in the KwaDukuza and Rustenburg SEAs can be understood. Although the KwaDukuza and Rustenburg SEAs are environmental policy making processes and not decision making processes, they are policies which inform municipal environmental decision making. Environmental consultants therefore become integrated into the decision making process because they inform the decisions which are being made. There are three story lines within this theme; the 'environmental consultants do the work', the 'integration of information into a SEA', and the 'quality of a SEA'.

The 'Environmental Consultants Do the Work' Story line

The 'environmental consultants do the work' is the first story line story line in the 'role of actors in a SEA' theme. This story line refers to the role of the environmental consultants appointed to undertake the KwaDukuza and Rustenburg SEAs. This story line was used by 11 of the 14 respondents and indicates that the majority of the respondents share a similar view of the role of environmental consultants in a SEA.

There are two parts to the 'environmental consultants do the work' story line. The first part refers to the environmental consultants as service providers who were appointed for the KwaDukuza and Rustenburg SEAs. The environmental consultants are seen as the "people who are putting together" the SEAs (Interview 1, KwaDukuza). The consultants are also described as "project managers" (Interview 1, Rustenburg 2) or "project coordinator(s)" (Interview 5, Rustenburg 2) who are responsible for the "overall project management" (Interview 2, Rustenburg 1) of the SEA. A respondent when describing the role of environmental consultants in the SEA said that "the consultant basically does the work" (Interview 2, KwaDukuza). This is very similar to a respondent from the KwaDukuza SEA who stated that environmental consultants "had to do the work, basically" (Interview 2, KwaDukuza). The consultants were seen as "service providers" who have "submitted a tender" stating "that they are going to do this particular work, at this particular price, (and) within this particular time" (Interview 2, Rustenburg 2). The relationship between the public officials and environmental consultants in the Rustenburg 1 SEA was described as a "professional relationship" between the client and the contractor, and the SEA was undertaken "on that basis" (Interview 3, Rustenburg 1). Environmental consultants can therefore be viewed as having to "drive the (SEA) process" (Interview 5, KwaDukuza).

The second part of the 'environmental consultants do the work' story line refers to the role of public officials in the KwaDukuza and Rustenburg SEAs. In contrast to the environmental consultants who were described as project managers, the public officials were often described as project directors. The project director is responsible for giving the SEA "direction" while "the project manager is more hands on" (Interview 3, Rustenburg 2). The public officials had to steer the consultants "in a certain direction" (Interview 5, Rustenburg 2) and ensure that the project is "still on-line and achieving the goals" (Interview 1, Rustenburg 2) of the SEA. A respondent from the KwaDukuza SEA indicated that the public officials were "merely managing the process" as they had "consultants doing the work" for them (Interview 1, KwaDukuza).

Although the 'environmental consultants do the work' storyline gives the impression that consultants do all the work in isolation, this is not a true reflection of all the projects. The degree of isolation was largely dependant on the level of involvement from the public officials in the SEA processes. The level of involvement from the public officials should be seen in terms of a continuum. It ranged from consultants exclusively managing the project to a situation where the public officials were too active and began to run the project. On the one extreme the public officials "were just happy with everything" that the consultants did (Interview 2, Rustenburg 1). A respondent from the Rustenburg 1 SEA felt that the public officials "were quite happy to plod along, dare I say, with whatever (the) consultant does and says" (Interview 3, Rustenburg 1). The respondent indicated that the public officials had "too much trust with who landed the project" and that "they dropped it too quickly" into the consultants laps "without steering it anywhere" (Interview 3, Rustenburg 1). On the other extreme there was a view that the public officials in the Rustenburg 2 SEA "were involved in the whole thing" and "did not say go run with the project" (Interview 1, Rustenburg 2). However, one of the respondents felt that specific public officials "wanted to run" the SEA. This created confusion for the consultants because they could not understand why the municipality had commissioned consultants if they wanted to undertake the project themselves (Interview 4, Rustenburg 2). The evidence therefore suggests that public officials of the Rustenburg 1 SEA were not very involved in the SEA and relied on the environmental consultants to drive the process. In contrast, public officials of the Rustenburg 2 SEA were involved in the entire process and in some situations specific officials were thought to be too involved in managing the process.

The 'environmental consultants do the work' story line exhibits the characteristics of a weak 'ecological modernisation' discourse as it supports a policy process which is largely technocratic (Christoff 1996). This story line suggests that the policy process and thus solutions to environmental problems are the responsibility of experts and managers (Oelofse *et al*. 2006). This 'leave it to the experts' discourse is diametrically opposed to the deliberative or democratic characteristics of strong ecological modernisation which includes a wide range of stakeholders in decision making (Dryzek 1997; Christoff 1996). Evers and Menkoff (2004) argue that environmental consultants are often seen as the driving force in environmental policy processes because of their resources, expertise and experience, and in situations where there is a lack of capacity in government. In this situation, consultants can play an important catalytic role and introduce new ways of thinking into the policy process. However, Bäckstrand (2003) argues the excessive reliance on consultants can lead to the politicisation of science and a policy process which lacks democratic quality.

The 'Integration of Information into a SEA' Story line

The 'integration of information into a SEA' is the next story line in the 'role of actors in a SEA' theme. This story line refers to the role played by public officials, environmental consultants, and key stakeholders in integrating information from various sources into the KwaDukuza and Rustenburg SEAs. As the story line was used by 11 of the 14 respondents it indicates that the majority of the respondents conceptualise a SEA as an assemblage of information from different sources.

The three main data sources in the KwaDukuza and Rustenburg SEAs are the public officials, environmental consultants, and key stakeholders. The environmental consultants are responsible for overall project management and compilation of the SEAs. The role of the consultants is to integrate "work from the various specialists" (Interview 4, Rustenburg 2) and input from the public officials and "(key) stakeholders" (Interview 1, Rustenburg 1) into the SEAs. Their responsibilities include "checking on the specialists" (Interview 4, Rustenburg 2) and "making sure (the) public participation is done" (Interview 4, Rustenburg 2). Environmental consultants therefore play the role of developing the SEA and integrating information obtained from the specialists, public officials, and public participation process into the SEAs.

The local authorities were responsible for "representing their respective municipality on the project" (Interview 1, Rustenburg 2). This group of public officials however also includes representatives of other government departments, such as the North West Provincial Government which worked closely with Rustenburg Municipality on the Rustenburg SEA and the Ilemebe District Municipality which worked closely with the KwaDukuza Municipality on the KwaDukuza SEA. The responsibilities of the public officials on the SEAs included "review(ing) all the reports" and making "inputs into the project process" (Interview 1, Rustenburg 1). These inputs are important because the public officials need to ensure that "the departmental issues are attended to in the process" (Interview 1, Rustenburg 1). The public officials contribute to the SEA by making sure that the policy process is informed "by the municipal issues", such as illegal dumping or air pollution (Interview 1, KwaDukuza). The public officials also have to ensure that the SEA aligns with existing polices, such as the Spatial Development Framework (SDF) and Integrated Development Plan (IDP), of each municipality. A respondent from the KwaDukuza SEA indicated that a SEA is a useful decision making tool, but it "should also talk to the IDP" (Interview 1, KwaDukuza). The public officials are responsible for directing the environmental consultants "to what information is available" and highlighting the "structures that are already in place" (Interview 4, KwaDukuza). The public officials therefore play

the role of integrating local information into the SEA, aligning it with municipal planning policies, and ensuring that due process is followed.

A respondent from the KwaDukuza SEA indicated that "it was important to get input from (public) officials because they would be implementing what was eventually put together" (Interview 4, KwaDukuza). However, it was noted that there were mixed feelings about how much input and direction the public officials provided in the KwaDukuza and Rustenburg SEAs. On the one extreme, a respondent from the Rustenburg 1 SEA stated that there were not "any really critical key issues coming from government" because the public officials tended to be "reserved in terms of what they said" (Interview 3, Rustenburg 1). This respondent felt that the public officials did not take "the opportunity" to indicate that they "are concerned about this and this and this" (Interview 3, Rustenburg 1). This was supported by another respondent from the Rustenburg 2 SEA who stated that the public officials "did not really bring that many new ideas" or ideas "newer than the terms of reference" to the project (Interview 2, Rustenburg 2). In contrast, a respondent from the Rustenburg 2 SEA felt that the public officials were very involved "in terms of inputs" (Interview 5, Rustenburg 2).

The key stakeholders represent the general public in the KwaDukuza and Rustenburg SEAs. The key stakeholders were responsible for "shaping" (Interview 4, Rustenburg 2) the SEA and to inform the public officials and environmental consultants of "what they see as the way forward" (Interview 5, Rustenburg 2). The role of the key stakeholders is therefore to "guide and inform" a SEA (Interview 5, Rustenburg 2). The key stakeholders were seen as an important component of the SEAs as they are "valuable in providing information" based on their "first hand knowledge" and "experiences" (Interview 1, Rustenburg 1). However, one of the respondents from the Rustenburg 1 SEA felt that the public meetings never really "came up with anything significantly different" (Interview 3, Rustenburg 1). The key stakeholders 'did not come up with guidance or what the issues were" (Interview 3, Rustenburg 1). The respondent felt that "they were not very pro-active at all" (Interview 3, Rustenburg 1). In contrast, a respondent from the Rustenburg 2 SEA felt that the key stakeholders "brought more meat to the bone" (Interview 1, Rustenburg 2). The key stakeholders therefore play an important role in setting the vision for the SEA, raising issues and concerns to be covered in the policy, and shaping the outcome of the process.

The 'integration of information into a SEA' story line reflects two characteristics of a shift towards a strong 'ecological modernisation' discourse. The first characteristic is inclusiveness and supports the integration of information from a wide range of sources into the SEAs (Oelofse *et al*. 2006; Christoff

1996). This characteristic stems from the epistemic notion of 'sustainability' which emphasises the integration of economic, environmental, and social issues derived from a range of actors (Dryzek 1997). The second reason that this story line is considered to be characteristic of strong ecological modernisation is because it supports a policy process which is deliberative and democratic (Oelofse *et al*. 2006; Christoff 1996). This story line emphasises the inclusion of key stakeholders in the policy process and the integration of their inputs into the SEAs. This characteristic is derived from a discourse of 'environmental justice' which supports the inclusion of key stakeholders in decision making processes which affect them (Hallowes and Butler 2002; Bond 1999; Dryzek 1997). The inclusion of key stakeholders in the policy process deepens the democratic quality of the process and restores the publics' trust in science and the credibility and legitimacy of the policy (Bäckstrand 2003).

The 'Quality of a SEA' Story line

The final story line in the 'role of actors in a SEA' theme is the 'quality of a SEA'. This story line refers to the role of the public officials and environmental consultants in determining the quality and outcome of the KwaDukuza and Rustenburg SEAs. Although the story line was only used by six of the 14 respondents, it represents an important minor narrative about the responsibility of the public officials as the clients.

There are two parts to the 'quality of a SEA' story line. The first part refers to the outcome of the SEAs and the second part refers to the implementation of the SEAs. One of the key responsibilities of the public officials as the clients is to ensure that the SEA is "delivered at the required standards" (Interview 2, Rustenburg 2). The public officials are therefore responsible for "quality control" and making sure that the project is "still on-line and achieving the goals" of the SEA (Interview 2, Rustenburg 2). The IEM SEA Guidelines (2006) outlines the roles and responsibilities of actors in the SEA process. The Guidelines emphasise the role of government in ensuring that the SEA is a quality product (DEAT 2006). One of the respondents indicated that it is essential "to get a good product on the table" and ensure that the client (the local municipality) is "happy with the product" (Interview 1, Rustenburg 1). The public officials need to ensure that "what ever is being prepared…covers all the issues" (Interview 1, KwaDukuza) and is what the municipality is "paying for" (Interview 2, KwaDukuza). The public officials were not satisfied with initial quality of the Rustenburg 2 SEA as they felt that the consultants had not covered several issues in the SEA. The consultants "nearly

fainted" because the SEA was turned "back more than five times" (Interview 1, Rustenburg 2). Gable (1996) argues that this situation often occurs because of miscommunication between the client and consultant as the consultants assume that it is the responsibility of the client to specify the goals of the project and that they deliver a product which is based on those goals. A failed consultancy may also occur because the client judges their level of satisfaction on the process and not the outcomes. However, the SEA was eventually accepted as the product met the expectations of the municipality as the client.

The second part of the 'quality of a SEA' story line refers to the implementation of the KwaDukuza and Rustenburg SEAs. A respondent from the KwaDukuza SEA felt that it is important to prepare a document that the public officials are "able to use" because it is pointless if it is a "SEA that sits on a shelf" (Interview 3, KwaDukuza). Therefore, it is important for the environmental consultants to prepare a document that was acceptable to the public officials as they would be the ones "implementing" it (Interview 4, KwaDukuza). The Rustenburg 1 SEA had however still not been implemented at the time of writing even though the project was completed in 2003. This is not due to the quality of the SEA, but because the document has not yet been approved by council. This is largely because the public official responsible for driving the project was reassigned to another department.

The 'quality of a SEA' story line reflects a weak 'ecological modernisation' discourse as it emphasises a strong economic influence on the SEA policy processes (Christoff 1996). This influence is reflected in the professional relationship between the public officials as the clients and the environmental consultants as the contractors. This characteristic stems from a discourse of 'economic rationalism' which supports a reliance on the market mechanisms, such as supply and demand (Dryzek 1997). The lack of capacity in local government creates a demand for the resources, expertise, and experience of environmental consultants.

The story lines in the 'role of actors in a SEA' theme provide an understanding of the roles of public officials, environmental consultants, and key stakeholders in the KwaDukuza and Rustenburg SEAs. These story lines indicate that consultants do the majority of the work, manage the process, and ensure that the outcomes meet the expectations of the client. The roles of public officials are to steer the project, provide municipal input, and ensure that the SEA is a quality product. The roles of key stakeholders are to provide local input and ensure that the SEA covers all the issues.

The 13 story lines within these four themes therefore show that the KwaDukuza and Rustenburg SEAs are framed within a discourse of 'ecological modernisation' and reflect the characteristics of both weak ecological modernisation and a shift to strong ecological modernisation. A number of these story lines reflect the characteristics of weak ecological modernisation as they are often economically-based, take an instrumental view of the environment, support a top-down decision making process, and emphasise the central role of the state and experts in the policy process. A number of these story lines also reflect a shift taking in place in environmental policy making towards strong ecological modernisation as they are attempt to integrate environmental issues into policy making process and encourage deliberation between a range of actors. These story lines are however not the only rhetorical device used by the actors to frame the KwaDukuza and Rustenburg SEAs within a discourse of 'ecological modernisation'. These actors also use employ specific policy vocabularies in the policies to frame the SEAs within the 'ecological modernisation' discourse. The following section discusses these policy vocabularies and the concepts which constitute these vocabularies.

5.4 Concrete Policy Vocabularies

This section focuses on the final concept of the discursive dimension of policy making; concrete policy vocabularies. (Hajer 2003: 10) defines policy vocabularies as "sets of concepts structuring a policy, conspicuously developed by policy-makers". Policy vocabularies therefore refer to the particular vocabularies which the public officials, environmental consultants, and key stakeholders conspicuously employ in the KwaDukuza and Rustenburg SEAs. Hajer (2003) uses the term 'concrete' to describe these policy vocabularies because they have been set into policy by government and are often not subject to debate as they are accepted concepts. These vocabularies consist of several concepts which are used as rhetorical devices to frame the three SEAs within the discourse of 'ecological modernisation'.

In contrast to the interpretation of story lines which derived evidence from the interview process (Refer to Section 5.3), the interpretation of policy vocabularies draws evidence from the SEAs themselves. The three SEAs interpreted are the KwaDukuza and the Rustenburg (Phase one and two) SEAs. Although the IEM SEA Guidelines (2004) define a SEA as an environmental management tool, a SEA is defined as a policy in the context of this research. This is because the three SEAs represent a strategic vision, proposed direction, and course of action which the KwaDukuza and

Rustenburg Municipalities intend to pursue (DEAT 2006). There are three policy vocabularies which were found to be conspicuously used in the KwaDukuza and Rustenburg SEAs. These are the 'developmental', 'management', and 'environmental' policy vocabularies. The discussion on each of these three policy vocabularies describes the nature of the vocabulary and provides an analysis of the concepts which support and reflect the discourse of 'ecological modernisation'. This analysis then discusses the frequency and context in which these concepts are used in the three SEAs. Although each vocabulary consists of several concepts, the discussion only focuses on the concepts which were found to be conspicuously used in the three SEAs.

5.4.1.1 The 'Developmental' Policy Vocabulary

The first policy vocabulary embedded in all three SEAs is the 'developmental' policy vocabulary. This vocabulary represents the way in which the public officials, environmental consultants, and key stakeholders prioritise developmental discourses and consequently embed the concepts of the 'ecological modernisation' discourse into the KwaDukuza and Rustenburg SEAs.

This vocabulary reflects a weak 'ecological modernisation' discourse as it largely economic and adopts an instrumental view of the environment as a resource base (Oelofse *at al*. 2006; Christoff 1996). The vocabulary emphasises economic growth and development at the expense of environmental and social interests. The concepts which constitute this vocabulary are derived from legislation and local policies that support the creation of conditions which encourage economic growth. For example, the Constitution of South Africa (Act 106 of 1996) describes local government as developmental and emphasises its mandate to promote social and economic development (RSA 1996). Local government in South Africa is viewed as a platform for transformation and development, service delivery, and attracting economic investment (Lemon 2002; Pieterse 2002). The Integrated Development Plan (IDP) is an example of a local policy which emphasises the developmental role of local government (KLM 2006; RSA 2000). The aim of an IDP is to assist each municipality in realising its development potential and to provide a long term development plan which is compatible with the capacity and resources of the municipality. The development concepts which constitute these policies and pieces of legislation are therefore also evident in the KwaDukuza and Rustenburg SEAs as the SEAs are required to align with existing government legislation and municipal policies (DEAT 2006). Although this vocabulary consists of several concepts, only two

concepts were found to be noticeably used in the KwaDukuza and Rustenburg SEAs. These concepts are 'development' and 'economic'.

The Concept of 'Development'

The concept of 'development' is one of the most commonly used concepts in the KwaDukuza and Rustenburg SEAs. It is used a total of 2263 times in the three SEAs. The figure includes all the derivatives of the term development, such as develop, developed or developing. The three most common ways in which development is used is in the phrases 'development plan' (141), 'development framework' (87), and 'sustainable development' (70). The phrase 'development plan' occurred more frequently because it includes references to the IDP. The phrase 'development framework' also occurs frequently as it includes references to the SDF. The phrase 'sustainable development' occurs frequently in the SEAs as the concept is accepted as the policy framework for environmental policy in South Africa and is also a core principle of a SEA (Oelofse *et al*. 2006). The other common uses of development include 'development applications' (50) and 'residential development' (40).

The Concept of 'Economic'

The concept of 'economic' is the second concept in the 'developmental' policy vocabulary which was conspicuously used in KwaDukuza and Rustenburg SEAs. Although the concept of 'economic' is not as extensively used in the three SEAs as the concept of 'development', it is important because it reflects the weak ecological modernisation characteristics of the 'developmental' policy vocabulary. The concept of 'economic' was used a total 216 times in the three SEAs. The most common way in which the 'economic' concept is used is in the phrases 'economic development' (33). The phrase 'economic development' occurs frequently in the three SEAs because it includes references to Local Economic Development (LED). The concept of 'economic' is also frequently used in the phrases 'economic growth' (22), 'economic opportunities' (5) and 'economic interventions' (4).

The KwaDukuza and Rustenburg SEAs therefore reflect a 'developmental' policy vocabulary as they align with existing legislation and policies which support economic growth in the municipalities. The concepts of 'development' and 'economic' show the strong emphasis in the SEAs on social and economic development, but within the framework of the environment's carrying capacity.

5.4.1.2 The 'Management' Policy Vocabulary

The second policy vocabulary embedded in the KwaDukuza and Rustenburg SEAs is the 'management' policy vocabulary. This vocabulary consists of concepts which describe the way in which the public officials, environmental consultants, and key stakeholders intend to manage the environment. There are only four concepts within the 'management' policy vocabulary which were found to be conspicuously used in the three SEAs. These concepts are 'strategic', 'management', 'planning', and 'policy'.

The 'management' policy vocabulary reflects the characteristics of weak ecological modernisation and a shift towards strong ecological modernisation. The vocabulary reflects a strong 'ecological modernisation' discourse as it supports institutionalising environmental considerations into local government using environmental management tools, such as the KwaDukuza and Rustenburg SEAs (DEAT 2006; Oelofse *et al*. 2006; Christoff 1996). These SEAs institutionalise the principles of SEA practice, such as the need to be strategic, in municipal decision making processes. The concept of a strategic approach is a core principle of SEA practice in South Africa as the IEM SEA Guidelines (2004) describe a SEA as a "strategic process" for integrating sustainability into environmental decision making (DEAT 2004b: 7). However, a respondent from the Rustenburg SEA felt that the strategic nature "of an SEA has been lost" by many practitioners (Interview 3, Rustenburg 1). This is because practitioners adopt an EIA based approach to SEA practice which is ineffective in achieving the strategic objectives of a SEA (Wallington *et al*. 2007).

The 'management' policy vocabulary also reflects the characteristics of a weak 'ecological modernisation' discourse as it supports a technocratic approach to environmental management (Christoff 1996). This approach emphasises the central role of the state and experts in the management of development and environmental protection and top-down decision making process. Dryzek (1997) refers to this situation as 'administrative rationalism' as public officials and experts assume that environmental problems are too complex for the general public and should be left to the authorities to find solutions. This 'leave it to the experts' discourse is in conflict with the deliberative, democratic, and open characteristics of strong ecological modernisation.

The 'management' policy vocabulary also reflects a shift towards strong ecological modernisation as it emphasises the inclusion of a broad range of policies and plans in the SEAs. This suggests that the three SEAs are not being implemented in isolation, but nested within existing policies. A respondent

from Rustenburg stated the SEAs are not "isolated projects" as the SEAs and the other municipal policies, such as the IDP, need to "talk to each other" (Interview 1, Rustenburg 1). The inclusion of existing legislation and municipal policies also adds legitimacy to the SEA because "legislatively speaking", the SEA is not legally binding as it is only "a guiding tool" (Interview 1, Rustenburg 2). This is because SEA practice in South Africa is voluntary and *ad hoc* in nature (Retief *et al*. 2007a). The SEAs draw on legislation and several policies which are legally binding, such as the NEMA, ECA, the IDP and the SDF, to support the guidelines outlined in the SEAs. For example, the Municipal Systems Act (Act 32 of 2000) states that each municipality is required to compile a strategic assessment as part of the SDF for the IDP (NWPG 2004). Another example is the ECA (Act 73 of 1989) which states that environmental decision making should consider the impact of development on the environment and the assessment should promote sustainable development (RSA 1989). These are both core principles of a SEA.

The 'management' policy vocabulary therefore consists of concepts which support a weak ecological modernisation dimension and a shift towards strong ecological modernisation. A number of the concepts reflect the institutional and inclusive characteristics of strong ecological modernisation. A number of the concepts also reflect the technocratic characteristics of weak ecological modernisation. The following section discusses four of these concepts; 'strategic', 'management', 'planning', and 'policy'.

The Concept of 'Strategic'

The first concept in the 'management policy vocabulary' is the concept of 'strategic'. This concept emphasises a key difference in the way that an EIA and a SEA manages the impact of development on the environment. SEA practice emerged as a result of the inability of an EIA to effectively deal with strategic levels of decision making (Chaker *et al*. 2006; DEAT 2006; 2004b; NWPG 2004). This is because EIA is project specific and focuses too narrowly on biophysical issues (DEAT 2004a). This concept is used a total of 451 times in the KwaDukuza and Rustenburg SEAs. This figure includes the derivatives of the concept of 'strategic', such as strategy and strategically. The most common way in which the concept is used is in the phrase 'strategic environmental assessment' (132). This concept occurs also frequently in the phrases 'strategic environmental management plan' (51), 'strategic direction' (6), and 'strategic plan' (6). It was noted that this concept occurs frequently

as an adjective to emphasise that the noun, such as plan, is heading towards some specific purpose in the long term.

The Concept of 'Management'

The concept of 'management' is the second most frequently used concept in the KwaDukuza and Rustenburg SEAs following the concept of 'development'. This concept is used a total of 909 times in the three SEAs and includes the derivatives of the term management, such as manage, manager, managing, and managed. The concept is most commonly used in the phrase 'environmental management' (209). The phrase frequently occurs as it includes references to the Strategic Environmental Plan (SEMP), National Environmental Management Act (NEMA), Environmental Management Plan (EMP), and Environmental Management Systems (EMS). The phrase 'management plan' is used 108 times and occurs frequently because it includes references to the SEMP and EMP. The phrase 'waste management' is also frequently used in the three SEAs. Of the 93 references to the phrase 'waste management'; the majority occur in the Rustenburg 1 SEA. This is because there is only one municipal dump site in Rustenburg and the site "has gone over its capacity" (RLM 2003). This situation has resulted in illegal dumping which has become a serious problem in the Rustenburg Municipality. The other common ways in which the concept of 'management' is used includes the phrases 'land-use management' (22) and 'management framework' (17).

The Concept of 'Planning'

The concept of 'planning' is used a total of 768 times in the KwaDukuza and Rustenburg SEAs. The figure includes all the derivatives of the term planning, such as plan, plans, and planned. The most common way in which the concept of 'planning' is used is in the phrase 'management plan' (108). This phrase occurs frequently in the three SEAs as it includes references to the SEMP. The phrase 'development plan' occurs 88 times in the KwaDukuza and Rustenburg SEAs as it includes several references to IDP. The concept of 'planning' also frequently occurs as the term 'planning' in phrases such as 'town planning' which is used 30 times in the three SEAs.

The Concept of 'Policy'

The final concept in the 'management' policy vocabulary is the concept of 'policy'. This concept is used a total of 159 times in the KwaDukuza and Rustenburg SEAs and includes the term policies. This concept occurs frequently in the three SEAs in phrases such as 'environmental policies' (4), 'planning policies' (3), 'sub-division policy' (3), 'policy framework' (2), and 'policy environment' (2). There is very little similarity in the way the concept of 'policy' is used in the SEAs. This is because in each case the concept refers to a specific policy in each municipality. For example, references to the phrase 'coastal policy' only occur in the KwaDukuza SEA as the Rustenburg Municipality is inland and does not have a coastline.

The KwaDukuza and Rustenburg SEAs therefore reflect a 'management' policy vocabulary as they provide a framework for managing the impact of development on the environment. The concepts of 'strategic', 'management', planning', and 'policy' supports this framework and describe the strategic nature of a SEA and approaches to environmental management, such as planning and or environmental policies.

5.4.1.3 The 'Environmental' Policy Vocabulary

The final policy vocabulary embedded in the KwaDukuza and Rustenburg SEAs is the 'environmental' policy vocabulary. This vocabulary consists of all the concepts which describe the management of the biophysical elements of the two municipalities, such as the terms sustainability, preserve, ecology, sensitive, nature, conserve, and protect.

The 'environmental' policy vocabulary reflects a shift towards a strong 'ecological modernisation' discourse as it supports an ecologically-based approach which places environmental interests at the forefront (Oelofse *et al*. 2006; Christoff 1996). This vocabulary consists of concepts, such as 'nature', to show a focus in the SEA on the biophysical environment. The concept of the environment is more narrowly defined in the KwaDukuza and Rustenburg SEAs to reinforce the aim of a SEA which is to integrate the consideration of the environment into strategic decision making processes (Retief *et al*. 2007a; DEAT 2006; 2004b). This vocabulary also supports a less instrumental view of the environment as the biophysical environment is not only viewed as a set of resources or assets. This vocabulary supports a view which considers the ecology, sensitivity, and preservation of the

biophysical environment. This vocabulary therefore also draws on a 'green radicalism' discourse as it supports a shift in the way the environment is conceptualised (Baker *et al*. 1999; Dryzek 1997). This is because green radicalism focuses on quality of life and not the standard of living. This vocabulary also draws on the epistemic notion of 'sustainability' which emphasises that the environment should determine how much development can take place (Dryzek 1997). This approach is one of the core principles of SEA practice in South Africa as the IEM SEA Guidelines (2004) state that a SEA should determine the most suitable development for an area by identifying the opportunities and constraints that the environment places on development (DEAT 2004b). Another core principle of SEA practice is the concept of 'sustainability' which has grown in dominance internationally and in South Africa since the 1980s (DEAT 2006; 2004b; Hallowes and Butler 2002; Dryzek 1997). DEAT (2004b) defines a SEA as an environmental management tool for integrating sustainability into strategic environmental decision making. Oelofse *et al*. (2006) argues that this concept is now widely accepted as the policy framework for legislation in South Africa. For example, the Constitution of South Africa (Act 106 of 1996) states that legislation and other measures, such SEAs, should "secure ecologically sustainable development" (RSA 1996: 1253).

The 'environmental' policy vocabulary therefore consists of concepts which reflect a shift towards a strong 'ecological modernisation' discourse. These concepts support an ecologically based approach to environmental management which integrates environmental issues into decision making processes. Although there are several concepts which make up the 'environmental' policy vocabulary, only three concepts were found to be evidently used in the three SEAs. These concepts are 'sustainability', 'nature', and 'ecology'.

The Concept of 'Sustainability'

The first concept in the 'environmental' policy vocabulary' is the concept of 'sustainability'. This concept features prominently in the KwaDukuza and Rustenburg SEAs as a SEA is defined as a "process of integrating the concept of sustainability into strategic decision-making" DEAT (2004b: 4). This concept is used a total of 425 times in the three SEAs and this figure includes the derivative of the term sustainability; sustainable. This concept occurs frequently in the three SEAs in the phrases 'sustainable development' (70), 'sustainability' (40), 'sustainable use' (13), and 'sustainable manner' (7). The concept of 'sustainability' frequently occurs as the term 'sustainable' which is used as an adjective in the SEAs to emphasise that the particular noun, such as the term development, can be

sustained in the future. It was noted that the term 'sustainability' occurs more frequently in the KwaDukuza SEA than the term 'sustainable development'. In contrast, the term 'sustainable development' occurs more frequently than the term 'sustainability' in the Rustenburg SEAs.

The Concept of 'Nature'

The concept of 'nature' is an environmental concept which refers to the biophysical environment of the KwaDukuza and Rustenburg Municipalities. This concept is used a total of 634 times in the three SEAs. This figure includes the derivatives of the term 'nature', such as the terms natural and naturally. The most common way in which the concept is used in the KwaDukuza and Rustenburg SEAs is in the phrases 'natural areas' (82), 'natural environments' (65), 'natural vegetation' (28), and 'natural habitat' (17). It was found that the concept of 'nature' is frequently used as an adjective in the three SEAs to refer specifically to the biophysical environment. The concept 'nature' also occurs frequently in the term 'nature reserves' (50). It was noted that the term 'nature' occurs more frequently in the Rustenburg 1 SEA than the Rustenburg 2 or KwaDukuza SEAs. This is because there are several references to the phrase 'nature reserve', such as the Rustenburg Nature Reserve which surrounds the town of Rustenburg. In contrast, the KwaDukuza SEA places a greater emphasis on the phrase 'natural vegetation'. This is because the municipality only has small pockets of coastal forest which have not been impacted on by agriculture or development. This is the reason that some of the respondents felt that the municipality does "not have much in terms of (natural) vegetation" (Interview 1, KwaDukuza) or that they "did not really have any to begin with" (Interview 2, KwaDukuza). One of the respondents indicated that "there were so few pockets" of coastal forest which they were able to identify (Interview 6, KwaDukuza).

The Concept of 'Ecology'

The final concept in the 'environmental' policy vocabulary is the concept of 'ecology'. This concept is used a total of 203 times in the KwaDukuza and Rustenburg SEAs. This figure includes the derivative of the concept; ecological. This concept occurs frequently in the three SEAs in the phrases 'ecological systems' (34), 'ecological integrity' (26), and 'ecological processes' (12). This concept is also frequently occurs in phrases, such as 'ecological impact' (4) and 'ecological importance' (2). The concept of 'ecology' also occurs frequently in the three SEAs as an adjective to link terms, such as systems, integrity, and processes, to the biophysical environment.

The three SEAs therefore reflect an 'environmental' policy vocabulary as they emphasise the management of the biophysical environment. The concepts of 'sustainability', 'nature', and 'ecology' show a strong emphasis in the SEAs on the biophysical environment.

5.5 Conclusion

This chapter focuses on the discursive dimension of environmental policy making in the KwaDukuza and Rustenburg Municipalities. The discursive dimension consists of three concepts which are used to understand the role of environmental consultants in the KwaDukuza and Rustenburg SEAs. These concepts are discourse, story lines, and policy vocabularies.

From the interpretation of the oral data collected from the interviews with the public officials, environmental consultants, and key stakeholders, as well as the SEA documents, only one discourse emerged. The discourse of 'ecological modernisation' was found to frame the story lines actors use, as well as the vocabularies employed in the SEAs. In order to interpret the story lines that the respondents use, four broad themes were created based on the objectives of this research. These broad themes are 'what is an SEA?', the 'need for a SEA', the 'need for consultants', and the 'role of actors in a SEA'. The story lines within each theme are presented in table 5.1.

The story lines in the 'what is an SEA?' theme indicate that a SEA is a strategic decision making tool, which takes into account the carrying capacity of the environment for development, and attempts to balance competing biophysical, economic, and social interests. The story lines in the 'need for a SEA' theme indicate that a SEA is needed for the KwaDukuza and Rustenburg Municipalities because of the rapid rate of development, the impact of development on the environment, and the need to integrate environmental considerations into policy and planning processes. The story lines in the 'need for consultants' theme indicate that environmental consultants were commissioned to undertake the KwaDukuza and Rustenburg SEAs because of a lack of capacity and accountability in government, and the consultants are seen as specialists. The story lines in the 'role of actors in a SEA' theme indicate that environmental consultants undertake the majority of the work, but that public officials, environmental consultants, and key stakeholders integrate various sources of information to the KwaDukuza and Rustenburg SEAs. These story lines also indicate that public officials and environmental consultants play an important role in ensuring that the SEA is a quality product.

Table 5.1: Summary of story lines used in the KwaDukuza and Rustenburg SEAs

THEME	STORY LINE
What is a SEA?	The 'SEA as a decision making tool'
	The 'carrying capacity of the environment for development'
	The 'need to balance brown and green issues'
	The 'need to be strategic'
The need for a SEA	The 'rapid municipal development'
	The 'impact of development on the environment'
	The 'environment is marginalised in policy and planning processes'
The need for consultants	The 'lack of capacity in local government'
	The 'environmental consultants are specialists'
	The 'lack of accountability in government'
The role of actors in a SEA	The 'environmental consultants do the work'
	The 'integration of information into a SEA'
	The 'quality of a SEA'

Policy vocabularies represent the rhetorical devices which actors use to embed the discourse of 'ecological modernisation' into the KwaDukuza and Rustenburg SEAs. Policy vocabularies consist of sets of concepts which are conspicuously employed by the actors to frame a specific policy. There are three policy vocabularies which are embedded in the three SEAs. These are the 'developmental', 'management', and 'environmental' policy vocabularies. These policy vocabularies and the dominant concepts within these vocabularies are presented in table 5.2.

The 'developmental' policy vocabulary consists of the concepts of 'economic' and 'development' and reflects the economic emphasis of the KwaDukuza and Rustenburg SEAs. The 'management 'policy vocabulary consists of the concepts of 'management', 'strategic', 'planning', and 'policy'. This vocabulary reflects the way in which the municipality intends to manage the impact of development on the environment. The 'environmental' policy vocabulary consists of the concepts of 'sustainability', 'nature' and 'ecology', and reflects the emphasis on the biophysical environment in the three SEAs. It was found that particular concepts within the vocabularies were conspicuously used in the KwaDukuza and Rustenburg SEAs and therefore have a significant influence on the way in which the SEAs are framed.

Table 5.2: The occurrence of policy vocabularies employed in the KwaDukuza and Rustenburg SEAs

POLICY VOCABULARY	CONCEPT	TOTAL
Developmental policy vocabulary	‘development’	2263
	‘economic’	216
Management policy vocabulary	‘strategic’	451
	‘management’	909
	‘planning’	768
	‘policy’	159
Environmental policy vocabulary	‘sustainability’	425
	‘nature’	634
	‘ecology’	203

CHAPTER 6: THE PERFORMATIVE DIMENSION OF POLICY MAKING

6.1 Introduction

Chapter six is the second of two chapters which present the results of this research. The previous chapter examines the discursive dimension of policy making and includes three concepts; namely discourse, story lines, and policy vocabularies which are applied to the KwaDukuza and Rustenburg SEAs. Chapter six analyses the performative dimension of policy making and applies four concepts; scripting, staging, setting, and performance to the three SEAs.

The aim of this research is to use a discourse analysis of the KwaDukuza and Rustenburg SEAs to interpret the role of environmental consultants in municipal environmental decision making. In order to achieve this aim, the research aims to understand the performance of the KwaDukuza and Rustenburg SEAs. The performance of the policy process is important as it influences the way in which the language or discourse discussed in Chapter five is produced, reproduced, and transformed. Hajer (2006) argues that other approaches to discourse analysis only focus on the language used in the policy process and not the actual practices in which the language is used. These practices are an important focus of analysis as policy making does not take within an institutional vacuum. Hajer (2005a) refers to these sets of practices as the political-symbolic context of the policy process. The policy process should therefore be seen as series of staged events in which actors deliberate in order to move the process forward. The performative dimension of policy making focuses on the meaning that is produced and reproduced through deliberation, and the particular setting in which this process takes place.

Chapter six focuses on the performative dimension of policy making and consists of four concepts which are applied to the KwaDukuza and Rustenburg (Phase 1 and 2) SEAs in order to understand the performances of environmental policy making. The discussion on each of the four concepts of scripting (Refer to Section 6.2), staging (Refer to Section 6.3), setting (Refer to Section 6.4) and performance (Refer to Section 6.5), presents the definition of the concept, and discusses how the concept has been applied to the policy process and the significance of the concept in the environmental policy making.

6.2. Scripting

The first concept which is applied to the KwaDukuza and Rustenburg SEAs in order to understand the performative dimension of policy making is scripting. Hajer (2006: 49) defines the concept of scripting as "those efforts to create the setting by determining the characters in the play and to provide cues for appropriate behaviour". The interpretation of the three SEAs focuses on two aspects of scripting. These are the actors involved in the policy process, and the script which brings the actors together and provides the cues which define the actors' behaviour.

There are a range of actors involved in the KwaDukuza and Rustenburg SEAs. The range of actors involved in the SEAs is determined by the technical and legal nature of the SEA process. The actors involved in the three SEAs include the state as the leading agent, the environmental consultants who are appointed by the state to conduct the SEA, and the key stakeholders who have a 'stake' in the proposed development. These actors can be grouped into two groups. These are the project steering committees and stakeholder committees. The project steering committees consist of "a small manageable group of professionals" in which "no public or councillors were involved" (Interview 1, Rustenburg 2). The project steering committee in both SEA processes were responsible for "driving the project" (Interview 5, Rustenburg 2). For example, the project steering committee in the KwaDukuza SEA consisted of two public officials, two environmental consultants, and a representative of the Development Bank of South Africa (DBSA). Of the two public officials, the project leader is a town planner and the project assistant is an environmental officer. The role of environmental consultants in the project steering committee is to facilitate the production of the SEA and also consisted of a project leader and a project assistant. The DBSA were responsible for funding the project.

The presence and composition of the project steering committee reflects a strong 'administrative rationalism' discourse in the SEA policy process. This discourse supports a technocratic approach in which environmental decision making is left to the experts, such as public officials and environmental consultants (Dryzek 1997). Oelofse *et al*. (2006) argue that environmental management in South Africa is dominated by scientific experts and managers who are responsible for the technical and institutional solutions to environmental problems. This approach reflects the technological and technocratic characteristics of weak ecological modernisation (Christoff 1996).

The second group of actors are the stakeholder committees. The stakeholder committee in the three SEA processes is much broader and includes the public participation consultants and a range of key stakeholders. The key stakeholders are included in the stakeholder committee as they can "provide first hand knowledge on (their) experiences and issues" (Interview 1, Rustenburg 2) and because "they know what the problems are" (Interview 5, Rustenburg 2). The key stakeholders play an important role in shaping the SEA and guiding the policy process (Interview 5, Rustenburg 2; Interview 4, Rustenburg 2). The key stakeholders are also included in the policy process as it is a legal requirement, as well as a core principle of SEA practice in South Africa. The IEM SEA Guidelines (2004) emphasise that a SEA is "a participative process" (DEAT 2004b).

For example, the stakeholder committee of the KwaDukuza SEA consists of several individuals and organisations from civil society. Two of the most prominent stakeholders in the KwaDukuza SEA are Simon Bundy and Di Jones. Simon Bundy is an independent environmental consultant who used to work for the KwaDukuza Local Municipality's planning department. Simon Bundy has an MSc in Ecology and 15 years experience in environmental management. He was described by one of the other respondents as "an amazing person (with) such a wealth of knowledge" and as being "so knowledgeable it is scary" (Interview 6, KwaDukuza). Simon Bundy is seen as a prominent stakeholder because he lives in the municipality, is still very involved in the municipality and because he "has a high ethic" (Interview 6, KwaDukuza). Although he is seen as being "more pro-environment than development", he is not seen as being "anti-development" (Interview 2, KwaDukuza). Although many of the respondents refer to Di Jones as an individual, she represents the interests of the Dolphin Coast Conservancy[6] and is chairperson and spokeswomen for this environmental organisation (Interview 6, KwaDukuza). This Conservancy protects the coastline stretching from the Tongaat River in the south to the Zinkwazi River in the north. It is quite a large organisation which consists of 83 body corporates and several private families (Interview 6, KwaDukuza). Although Di Jones is currently retired, she used to work for the Wildlife and Environment Society of South Africa (WESSA) based in Gauteng. She is seen as being an influential stakeholder because she is quite vocal, pro-active, and generally knows what is happening "on the ground" (Interview 2, KwaDukuza).

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[6] A conservancy is defined as "the voluntary, co-operative management of an area by its community and users, and in respect of which registration has been granted by the relevant authority" (SAC 2001)

The strong emphasis on public participation in South Africa is driven by the 'environmental justice' discourse which supports the inclusion of members of civil society in the decision making processes which affect them (Bond 1999). Oelofse *et al*. (2006) argue that there are participatory processes emerging alongside the mainstream technocratic procedures of environmental management in South Africa. These approaches support more equitable processes of environmental management and new ways of deliberating over approaches to managing the impact of development on the environment. Hajer and Wagenaar (2003) argue that it is within these new collaborative approaches that the state and non-state actors are able to deliberate over the definition and solutions to environmental problems. These processes reflect the deliberative and democratic characteristics of strong ecological modernisation (Christoff 1996).

The scripting of the KwaDukuza and Rustenburg SEAs is largely determined by the SEA process which is outlined in the IEM SEA Guidelines (2006; 2004) and each project's Terms of Reference (TOR). This process can be seen as the master script as it brings all the actors together and defines their roles and responsibilities in the policy process (Hajer 2006; 2005a). For example, the first phase of a SEA process should "bring stakeholders together and facilitate the development of a shared vision on environmental problems, objectives, and alternative actions to achieve these" (DEAT 2006: 13). The SEA process therefore provides the cues which determine the behaviour of the actors and sets the stage or initiates the way in which the rest of the policy making process will proceed.

The IEM SEA Guidelines (2006; 2004) produced by DEAT and Council for Scientific and Industrial Research (CSIR) stipulate the steps which the consultants and public officials need to take during a SEA process and the roles and responsibilities of the various actors. For example, the Guidelines define the role of environmental consultants as "managing" the projects (DEAT 2006: 12). Several of the respondents supported this script as the environmental consultants were often described as the "project managers" (Interview 1, Rustenburg 2; Interview 4, Rustenburg 2). The Guidelines support the use of consultants in a SEA process as it recognises that SEA practice requires "a variety of skills that are often not readily available within government departments" (DEAT 2006: 12). The Guidelines define the role of the public officials as "steering" the SEA and this script is supported by respondents who describe the role of public officials as steering the project "in a certain direction" (Interview 5, Rustenburg 2). The Guidelines state that levels of public participation vary from being informed of the process to influencing the decisions made in the process. The level of public participation is therefore determined by the approach to a SEA as some approaches result in

stakeholder fatigue and others in limited stakeholder engagement because the issues are to strategic or removed from people's everyday concerns (DEAT 2006).

The SEA Guidelines (2006) also outline the main steps in a SEA process and discuss the key challenges in each step. The main steps are screening, scoping, situation assessment, specialist studies, identifying and comparing alternatives, significance, tradeoffs, defining scales and boundaries of a SEA, developing a Strategic Environmental Management Plan (SEMP), implementation, and quality control (DEAT 2006). The KwaDukuza and Rustenburg TORs are based on these steps and outline the purpose and structure of the projects. The TORs define what the desired outcome of the SEA is and what the actors need to do in order to achieve those outcomes. This is the reason the project steering committee "used the terms of reference" as "the way forward" (Interview 3, KwaDukuza). For example, the TOR of the Rustenburg 2 SEA outline the SEA policy process which the consultants need to follow and specific outcomes of the project (Refer to Appendix B). The main steps in the policy process and specific outcomes of each stage are (RLM 2005: 5):

1. Status Quo Assessment
    - Public Participation
    - Data Collection
2. Setting the Vision (Desired State of the Environment)
3. Develop strategies to attain DSOE
    - Formulate Development Zones
    - Determine development parameters
    - Consult with stakeholders
4. Develop Strategic Environmental Management Plan
    - Formulate management guidelines per development zone
    - Develop monitoring, evaluation and reporting systems
5. Compile Strategic Environmental Assessment Report

It was noted that there was very little change in the TORs of the KwaDukuza and Rustenburg SEAs as this would result in a 're-scripting' of the policy process. For example, in the KwaDukuza SEA, an "inception meeting" was held in the initial stages of the project between the clients and environmental consultants to "clarify exactly" what the municipality is "trying to get out of" the process (Interview 4, KwaDukuza). The TOR did not change much because any changes would be outside of the proposal for which the consultants had tendered. One of the respondents indicated that the

municipality did not change the TOR as it did not have "money to pay" the consultants "for more time" spent on the project (Interview 2, KwaDukuza).

Scott and Oelofse (2007) apply the four concepts of the performative dimension of policy making, namely scripting, staging, setting, and performance, to the public participation process of the Small Craft Harbour in Durban. This case study focuses on the EIA process and discourses that framed the deliberations between the eThekwini Municipality, private developers, and key stakeholders over the development of a small craft harbour on a beach site where a range of sporting and recreational activities take place. Scott and Oelofse (2007) identified the legislated technocratic procedures of the EIA process as the master script. These procedures stipulate that key stakeholders need to be informed and given the opportunity to comment on the proposed development. Scott and Oelofse (2007) argue that these technocratic procedures limited the appropriate behaviour of key stakeholders to an advisory role. The EIA team meetings were scripted to include scientific specialists, the private developers, and their team of experts. The appropriate behaviour of this group was to objectively report on and discuss information and results.

The scripting of the KwaDukuza and Rustenburg SEAs is therefore largely determined by the SEA process. This process is strongly influenced by the IEM SEA Guidelines (2006; 2004) and the TOR for each project as they determine the appropriate behaviour of the range of actors involved. These cues stipulate which actors are involved in policy making and their roles and responsibilities in the policy process. For example, the role of public officials is to steer the project and the role of consultants is to manage the process. The role of key stakeholders is dependent on the approach to a SEA as their level of involvement ranges from consultation to deliberation. The scripting of the actor's behaviour therefore determines the staging of the interactions between the actors as some actors, such as the consultants, are scripted to play a more dominant role in the policy process. The Guidelines and TORs also provide a script for the policy process and stipulate the steps that need to be followed to achieve specific outcomes. For example, the TOR of the Rustenburg 2 SEA states that the consultants need to undertake public participation and data collection in order to produce the Status Quo Assessment Report for the SEA. The scripting of the policy process therefore determines the main steps of the policy process and acts in which the interactions between actors take place.

In order to understand how the scripting of the KwaDukuza and Rustenburg SEA influences the staging of the policy process, the interpretation of the three SEAs needs to examine how the

interactions between actors have been deliberately organised or staged according to the script. The following section discusses the staging of the KwaDukuza and Rustenburg SEA policy processes.

6.3 Staging

The second concept of the performative dimension of policy making which is applied to the KwaDukuza and Rustenburg SEAs is staging. Hajer (2006: 49) defines staging as "the deliberate organisation of an interaction, drawing on existing symbols and the invention of new ones, as well as the distinction between active players and audiences". This section will compare the staging of the Rustenburg 1 SEA and Rustenburg 2 SEA in terms of three aspects of staging. These aspects are the deliberative organisation of interactions between actors, the old and new symbols which emerge from these interactions, and the distinction between active and passive actors. The KwaDukuza SEA was excluded from the comparison as it is still a 'work in progress'. The comparison between the staging of the Rustenburg 1 SEA and Rustenburg 2 SEA highlights the importance of understanding the staging of the SEA processes as the organisation of interactions in these two case studies is very different.

Rustenburg Priority Area 1 SEA

The main actors which were scripted in the Rustenburg 1 SEA are members of the project steering committee and key stakeholders. The project steering committee included representatives from the North West Provincial Government (NWPG), Rustenburg Local Municipality, Department of Developmental Local Government and Housing, the Finnish Institute, and the environmental consultants. The Finnish Institute were responsible for funding the project. As the central aim of the research is to understand the role of environmental consultants in the SEA process, the analysis here focuses on the organisation of interactions between the consultants and other the actors.

The NWPG "initiated the project" and were responsible for reviewing all the documents, providing inputs, keeping the project on line, and ensuring that the department's issues and concerns related to the environment are included (Interview 3, Rustenburg 1). The interaction between the environmental consultants and the NWPG were generally very good according to the comment from one of the respondents: "they really had a good working relationship" (Interview 1, Rustenburg 1). It was stated

that this was because the NWPG as the client never had to remind the consultants to "submit the reports or do something (as) they drove it from their side" (Interview 1, Rustenburg 1). The only problem with the interaction between the NWPG and environmental consultants that was reported is the absence of senior officials from NWPG in the SEA policy processes. A respondent felt that given the "significance and consequence of the project on the area (that) it is beyond our understanding that more senior people were not there or involved in the project" (Interview 3, Rustenburg 1).

The environmental consultants had a very similar relationship with the Rustenburg Municipality. It was stated by one of the respondents that the municipality and the environmental consultants had a "very professional relationship from the start" based on a "client and contractor" relationship (Interview 3, Rustenburg 1). The respondent stated that it was an "open relationship" as the municipal officials and consultants were able to approach one another to discuss issues relating to the SEA (Interview 3, Rustenburg 1). However, two of the respondents were critical that in some cases the municipal officials were too passive as they did not raise any "critical (or) key issues" (Interview 2, Rustenburg 1; Interview 3, Rustenburg 1). One of the respondents went as far as to say that the municipal officials "were quite happy to plod along, dare I say it, with whatever your consultant does and says" (Interview 3, Rustenburg 1). This respondent also felt that the municipality had "too much trust with who landed the project" as the municipal officials dropped it into the consultants' laps too quickly "without steering it anywhere" (Interview 3, Rustenburg 1). Evidence from the interviews suggests that there are two possible reasons for the passive scripting of the municipal officials. Firstly, one of the respondents indicated that the Rustenburg Municipality entered the process "very sceptical" about what the environmental consultants "could do for them" as the SEA had been initiated by provincial government i.e. NWPG (Interview 3, Rustenburg 1). Secondly, the respondent also indicated that the Rustenburg Municipality were passive because the municipal officials may have felt that it was "essentially a Finnish Institute project" (Interview 3, Rustenburg 1). This is because the Finnish Institute "seemed to drive the project" as "it was their money being spent" and "they wanted to make sure it was done properly" (Interview 3, Rustenburg 1).

The key stakeholders in the Rustenburg 1 SEA were also seen as being relatively passive throughout the policy process as the stakeholders "were not proactive at all" (Interview 3, Rustenburg 1). There are two reasons for the passive staging of the key stakeholders. Firstly, the environmental consultants felt that the public participation process was more about informing the general public about the project than actual deliberation. A respondent noted that the environmental consultants "tried to inform them rather then getting their feedback" (Interview 2, Rustenburg 1). The Rustenburg 1 SEA

policy process is therefore guided by a script which supports stakeholder consultation in place of stakeholder engagement (DEAT 2006). The role of key stakeholders in stakeholder consultation is limited to being informed of the process and providing inputs. This is in contrast to stakeholder engagement which supports deliberation, interactive consensus seeking, collaboration, and the active participation of key stakeholders in decision making processes. Secondly, the key stakeholders were scripted as passive because the SEA is not a controversial project (Interview 3, Rustenburg 1). One of the respondents noted that "there was less and less attendance (of key stakeholders) because there is nothing to fight" and that the key stakeholders are "just there to give input" (Interview 2, Rustenburg 1). The environmental consultants, on the advice of the public participation consultants, also separated the key stakeholders into different focus groups during the public participation process (Interview 3, Rustenburg 1). The developers, Rustenburg Olifantsnek Corridor Landowners Association (ROCLA), conservation groups, and commercial farmers were separated into focus groups to avoid conflict between individuals and organisations (RLM 2003). However, this did not allow for discussion and deliberation over issues. In addition to the focus group meetings, two public meetings were held in February and March 2003 for all Interested and Affected Parties (I&APs). There was however very little conflict in these meetings (Interview 3, Rustenburg 1).

The Rustenburg 1 SEA is therefore scripted by the IEM SEA Guidelines (2006; 2004) and the TOR to be a largely technocratic policy process (Christoff 1996). These cues stipulate the dominant role of the public officials in steering the project and the consultants in managing the process. The consultants were however more dominant in the policy process than the NWPG and municipal officials. Retief *et al*. (2007a) found that environmental consultants play a leading role in SEA practice in South Africa because the majority of SEA expertise is located in the private sector. A SEA requires a variety of skills which are often not available or fragmented across several government departments (DEAT 2006; Sowman 2002). This is the reason that the Guidelines assign a considerable amount of power and authority to consultants and sets the stage in which environmental consultants dominate the policy process. It was noted that the environmental consultants in the Rustenburg 1 SEA did not have to deliberately organise interactions to gain influence over the policy process as they were given the power by the officials of the NWPG and Rustenburg Municipality. This because the NWPG did not commit any senior officials to the project and the Rustenburg Municipality limited their involvement in the process. This resulted in very little deliberation between the consultants, NWPG, and municipal officials.

There was also very little interaction between the environmental consultants and the key stakeholders. The evidence shows that the key stakeholders were scripted to be passive as the staging of the policy process limited their levels of involvement to being informed about the process and consultation. In this context, consultation refers to a two way exchange of information between the key stakeholders and other actors in the policy process (DEAT 2002). Consultation however does not refer to the active participation of key stakeholders in decision making processes. It was noted that there were no significant attempts by the key stakeholders to deliberately organise the interactions which would provide them with a greater influence over the policy process.

Rustenburg Priority Area 2 SEA

The project steering committee in the Rustenburg 2 SEA included representatives from the North West Provincial Government (NWPG), Rustenburg Local Municipality, and the environmental consultants. The NWPG were responsible for funding Phase 2 of the Rustenburg SEA in this case. It is important to note that different environmental consultants were appointed for Phase 2 of the SEA. A respondent from the Rustenburg 1 SEA indicated that it was "pretty shoddy"[7] that there had been no communication between the consultants of Phase 1 and 2 as Phase 1 of the SEA was meant to inform Phases 2 and 3 (Interview 3, Rustenburg 1). The environmental consultants from Phase 1 were never "asked or approached" to "comment or (provide) criticism in terms of Phase 2" (Interview 3, Rustenburg 1).

The interactions between the environmental consultants and the NWPG were described as being very professional. In this professional relationship, the consultants were often referred to as a "service provider" (Interview 1, Rustenburg 2; Interview 2, Rustenburg 2). The NWPG "appointed professional people" because the department recognises that a SEA needs to be undertaken within "a professional field" (Interview 3, Rustenburg 2). The NWPG provided very little input into the policy process except for writing the TOR. One of the respondents however felt that the role the NWPG "played was enough" (Interview 5, Rustenburg 2). According to one of the respondents "the consultants, (as) the service providers, have basically submitted a tender, a proposal to say that (they are) going to do this particular work, at this particular price, (and) within this particular time"

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[7] For ethical reasons, the profession of the respondents could not be used when citing the responses as it was felt that this would reveal their identity. This was a challenge for this research as it detracted from the interpretation of the KwaDukuza and Rustenburg SEA policy processes.

(Interview 2, Rustenburg 2). The central responsibility of the NWPG as the investors in the project is to "create the climate for the SEA to be conducted in" (Interview 2, Rustenburg 2). However, one of the respondents stated that there was definitely a split between the public officials and the environmental consultants (Interview 2, Rustenburg 2). This was despite the continuous contact between the actors through phone calls and emails.

Evidence from the Rustenburg 2 SEA indicates that the policy process was not always smooth as there were disagreements over the study area, project time frames, and environmental issues covered in the SEA (Interview 1, Rustenburg 2; Interview 2, Rustenburg 2; Interview 5, Rustenburg 2). One of the respondents indicated that despite the disagreements "we were (not) at loggerheads" (Interview 2, Rustenburg 2). The environmental consultants appeared to have had difficulty with one specific member of the steering committee[8]. A respondent felt that this person was quite dominant within the steering committee and "seemed to be dominating the other members of the steering committee" (Interview 4, Rustenburg 2). This is contrast to the staging of the Rustenburg 1 SEA where the NWPG and Rustenburg Municipality were relatively passive in the policy process. One of the respondents noted that at times the clients wanted to run the project (Interview 4, Rustenburg 2). This confused the environmental consultants as they could not understand why consultants had been appointed to run the project if the clients intended to do it themselves. The interference by the clients in the management of the Rustenburg 2 SEA was seen as "serious clash" between the public officials and the environmental consultants (Interview 4, Rustenburg 2). However, some members of the steering committee intervened during these conflicts and assisted in ironing out the issues through negotiation (Interview 2, Rustenburg). One of the public officials in particular used their influence as the project manager to overcome this conflict (Interview 4, Rustenburg 2). The environmental consultants also experienced "resistance from the steering committee" whenever they wanted to make amendments to the TOR (Interview 4, Rustenburg 2). One of the respondents indicated that the actors often "found (them)selves confused" as neither the clients nor the environmental consultants were following the TOR (Interview 5, Rustenburg 2). The actors often had "to go back to the TOR" because even the "department itself was not to sure what the TOR (was) in some cases" (Interview 5, Rustenburg 2).

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[8] The respondent was reluctant to reveal the identity or profession of this steering committee member and therefore the discussion lacks some detail

The relationship between the Rustenburg Municipality and the environmental consultants was described by a respondent as a "very interesting relationship" (Interview 1, Rustenburg 2). This was because the relationships "fluctuated a bit" where "some meetings were good and some meetings were not so good" (Interview 5, Rustenburg 2). One of the greatest conflicts between the municipality and the environmental consultants was the over the quality of the SEA as the municipality "were not satisfied with the quality of the SEA" (Interview 1, Rustenburg 2). One of the respondents stated that the environmental consultants "nearly fainted" because the municipality turned the SEA "back more then five times" (Interview 3, Rustenburg 2). The SEAs were turned back because the municipal officials felt that some of the issues had not been covered in the SEAs. Retief *et al*. (2007b) argue that the leading actor, i.e. the Rustenburg Municipality, need to ensure that the SEA covers all the issues and that the documents are usable for the SEA to be effective. Chaker *et al*. (2006) argue that a SEA will only be effectively implemented if the public officials are satisfied and supportive of the project. The relationship between the municipality and the environmental consultants did however improve once the clients admitted that the consultants "had done a good job" (Interview 4, Rustenburg 2).

The evidence reveals that the mistrust between the public officials and environmental consultants was scripted for two reasons. Firstly, some of the respondents had worked with environmental consultants on other projects which can be described as "*kans vatters*"[9] (Interview 1, Rustenburg 2). This expression refers to environmental consultants who take a chance by tendering at the lowest possible rate and producing low quality work. A respondent from the KwaDukuza SEA emphasised that "it is the same old story (of) which consultant (as there) are some very, very good consultants and there are some very, very poor consultants" (Interview 6, KwaDukuza). Secondly, one of the respondents indicated that public officials mistrust environmental consultants because consultants collect "government information and rehash it" (Interview 2, Rustenburg 2). It was believed that consultants sell the governments' information back to them. These experiences may have contributed to the distrust between the public officials, as the clients, and environmental consultants, as the service providers, in the Rustenburg 2 SEA.

The final organised interaction between the actors of the Rustenburg 2 SEA, which this section discusses, is the interaction between the environmental consultants and key stakeholders. The overall perception from the environmental consultants and the public officials was that the key stakeholders were "satisfied" with the public participation process (Interview 4, Rustenburg 2). However, there

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[9] "*kans vatters*" is an Afrikaans colloquial term for someone who takes chances

appeared to be a contrast in the way the various respondents' view the degree to which key stakeholders were satisfied with the process. A respondent from the Rustenburg 2 SEA indicated that key stakeholders were passive in the policy process for two reasons. Firstly, there was some animosity towards the environmental consultants and the public participation consultants appointed to undertake the public participation process. This is because the first public meeting was cancelled and the stakeholders, especially the poor communities, had spent a lot of time and money in arranging transportation (Interview 5, Rustenburg 2). Secondly, the respondent felt that the public participation meetings were technical presentations and that "most of the people that come to the meetings are not very technical" (Interview 5, Rustenburg 2). The respondent indicated that the key stakeholders did not "really understand what is being said". In contrast, one of the respondents felt that the key stakeholders "were all supportive of the project" (Interview 1, Rustenburg 2). A respondent emphasised that the key stakeholders were supportive of the project because government is very involved in the local community and by "selling the ideas" of the project, the "people will come (to the meetings) without any suspicions" and "give you what you want" (Interview 3, Rustenburg 2). One of the respondents admitted that initially the key stakeholders were seen as being a "bit cautious", but after several meetings key stakeholders would come "closer to you and talk to you" (Interview 4, Rustenburg 2).

The second aspect of staging which has not yet been discussed is the symbols that are employed in the KwaDukuza and Rustenburg SEA policy processes. These symbols are signs which represent something else. A significant symbol which was identified in the Rustenburg 2 SEA are the ward councillors. The ward councillors were identified as a symbol because they represent "the voices of the community" in the policy process (Interview 1, Rustenburg 2). The ward councillors also act as link between the public officials and the key stakeholders (Interview 3, Rustenburg 2). The ward councillors were interpreted as a new symbol as there was a change in ward councillors halfway through the project. The previous ward councillors which were relatively passive were replaced by more active ward councillors that "wanted to be involved" in the project (Interview 1, Rustenburg 2). A respondent stated that the new ward councillors "wanted to make a difference" by introducing new inputs, ideas, and "*vooma*"[10] into the policy process (Interview 1, Rustenburg 2). The ward councillors were used as a symbol of the new democratic dispensation to attract key stakeholders to the public participation meetings. This dispensation is driven by the discourse of 'environmental justice' which emerged in post-apartheid South Africa and supports the meaningful participation of

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[10] "*Vooma*" is a colloquial term used to describe urgency.

key stakeholders in the decision making processes which affect them (Bond 1999). The key stakeholders saw the presence of the ward councillors at these meetings as an opportunity to raise their issues and concerns. The public officials and environmental consults would call on the ward councillors to "to organise the meeting" (Interview 3, Rustenburg 2) as those meetings were generally "packed" (Interview 4, Rustenburg 2). When meetings were held and the ward councillors were not present, the "people were not interested" (Interview 5, Rustenburg 2).

The Rustenburg 2 SEA was scripted in a similar way to the Rustenburg 1 SEA as both SEA processes are strongly influenced by the IEM SEA Guidelines (2006; 2004) and projects' TOR. The script of the SEA process assigns a considerable amount of power and authority to the environmental consultants because of the capacity constraints in government and the concentration of SEA expertise in the private sector (Retief *et al*. 2007a; DEAT 2006; Sowman 2002). In contrast to the Rustenburg 1 SEA, the public officials of the NWPG and Rustenburg Municipality did not just give the consultants the power over the policy process. There are two deliberately organised interactions in which the public officials took back some of the influence that the consultants have over the policy process. The first event occurred when one of the steering committee members began to dominate the other members of the committee and therefore the policy process. This created a conflict between this individual and the consultants as this intervention introduced a new script into the policy process. The 're-scripting' of the policy process altered the staging of the process as this individual took over the role of the consultants as the project managers. This conflict was however resolved through a process of negotiation and the intervention of a particular public official. This public official used their position and influence in the project steering committee to shift the staging of the policy process back to original script. The second event occurred at the end of the project lifecycle when the consultants submitted the final documents. The public officials were able to take back some of the power and authority assigned to the consultants by the script of the SEA process as the IEM SEA Guidelines (2006) assign the officials a considerable amount of power in determining the quality of the SEAs (DEAT 2006).

The roles and responsibilities of key stakeholders in the Rustenburg 2 SEA were scripted in a similar way to that of the Rustenburg 1 SEA as both processes limit the level of key stakeholder involvement to consultation. In consultation, key stakeholders are permitted to raise concerns and make comments regarding an activity or decision (DEAT 2002). However, it was noted that there was disagreement between the respondents over the degree to which this scripting limited the involvement of key stakeholders in the policy process. One of the respondents felt that there was very little involvement

from key stakeholders, while other respondents indicated that the key stakeholders were actively involved in the policy process. As with the Rustenburg 1 SEA, the key stakeholders in the Rustenburg 2 SEA did not deliberately organise an interaction which would give them a greater influence over the policy process.

Scott and Oelofse (2007) argue the scoping phase of the Small Craft Harbour EIA process was staged as a technocratic procedure because the process was dominated by a team of experts and gave little concern to public participation and public input. This team of experts were able to maintain these power relations by using constant references to the EIA regulations as these cues provide the consultant with power and authority. Additional specialist members, which included a social scientist, were then included in the team of experts to balance the understanding of the impacts and dominance of the developers perspectives. This move resulted in a 're-scripting' of the process as the new members introduced a new frame for assessing the different types of local and social knowledge. These assessment techniques were based on 'principles' and shifted the process away from a purely technical procedure of assessment. Despite the despite the challenge posted by a coalition of civil society actors, such as the water sports club and beach users, there was very little change in the dominance of the team of experts. Scott and Oelofse (2007) argue that the technical nature of the EIA procedure provided a script which limited the effectiveness of deliberation, collaboration, and dialogue between the actors. This constraining script prevented key stakeholders from meaningfully engaging in decision making processes and limited their involvement to an advisory role.

The staging of the KwaDukuza and Rustenburg SEAs is therefore largely determined by the scripting of the SEA process. The level and type of interactions between the range of actors is defined by the IEM SEA Guidelines (2006; 2004) and SEAs' TOR as they outline the roles and responsibilities of the actors in the SEA policy process. For example, the SEA process assigns a considerable amount of power and authority to the public officials and environmental consultants. The process also assigns more power to the consultants because of the fragmentation of skills in local government and the consultants' capacity, flexibility, and expertise to undertake a SEA (Retief *et al*. (2007b). In contrast, the SEA processes of the Rustenburg SEAs assigned very little power or authority to the key stakeholders. The role key stakeholders were limited to raising their issues and concerns, and making comments regarding an activity or decision. Therefore, the technocratic nature of the Rustenburg SEA processes limits the effectiveness of deliberation, collaboration, and consensus seeking approaches. In order to understand how the scripting and staging of the policy process influence the performance of policy making, the settings in which the policy process takes place need to be examined. The

following section discusses the physical setting of the KwaDukuza and Rustenburg SEA policy processes.

6.4 Setting

Setting is the third concept of the performative dimension of policy making which was applied to the KwaDukuza and Rustenburg SEAs. Hajer (2006: 49) defines setting as "the physical situation in which the interaction takes place, including the artefacts that are brought to the situation". The interpretation of the three SEAs focuses on two aspects of the concept of setting; the physical location in which the policy process takes place, and the props which are employed within this setting.

The two most common settings in which the interactions between the actors of the KwaDukuza and Rustenburg SEAs took place were the project steering committee meetings and public participation meetings. The project steering committee meetings in all three SEAs mostly took place at the local municipal offices. The project steering committee meetings of the KwaDukuza SEA took place in the KwaDukuza municipal offices and the Consultancy Firm's offices. In the Rustenburg SEAs (Phase 1 and 2), the project steering committee meetings took place in the boardroom of the Rustenburg municipal offices.

Hajer (2006) uses a formal meeting held by the Dutch Parliament's Environmental Committee in the negotiations about a trans-European transport network to illustrate the importance of examining the physical location of the policy process. One of the members of Parliament described the venue as a 'megalopalis' because of its size, large and heavy marble and granite exterior, and high ceilings. The respondent felt intimidated by the room in which the meeting was held as the room was enormous and they were seated at a table which was "half a mile long" (Hajer 2006: 42). Hajer (2006) argues that the decision to meet at this venue was perceived and interpreted by this Member of Parliament as a symbolic act of intimidation.

The evidence from the KwaDukuza and Rustenburg SEAs indicates that the steering committee venues were chosen for strategic reasons and not to influence the power relations of the policy process. For example, there are two reasons the municipal offices were chosen for the steering committee meetings in the Rustenburg SEAs. Firstly, the venue is central as it is the mid-point between the project consultants who are from Johannesburg and Phalaborwa, and Mbatho where the

offices of the NWPG are located. Secondly, it is the central node of the study area and "where things are happening on the ground" (Interview 3, Rustenburg 2). One of the respondents however indicated that the municipal offices were not a neutral venue as it gave the public officials power and authority over the interactions because "you always feel more comfortable in your own space" (Interview 5, Rustenburg 2). Scott and Oelofse (2007) argue that there were several objections and comments made about the neutrality of the venue used for the EIA team meetings in the Small Craft Harbour EIA. The meetings were held at in the boardroom of the developers and this venue set the stage for a process which was dominated by the developers and their team of experts. This example illustrates how the power relations between actors are influenced by the physical setting of the interaction (Thomas 1995; Hunter 1995).

The accessibility of the public participation meeting was an important consideration in KwaDukuza and Rustenburg SEAs. A respondent from the KwaDukuza SEA emphasised that "attendance is vital" and the setting of the meetings needs to ensure "as much participation as possible" (Interview 1, KwaDukuza). A respondent from the Rustenburg 2 SEA felt that the venue has to be "accessible to everyone" (Interview 1, Rustenburg 2). One of the respondents deemed a central venue to be essential as it is important to "get as close to the actual community living in the area" as possible (Interview 2, Rustenburg 2). The public participation meetings for the three SEAs were generally held in church halls, school halls, and the municipal offices. In the Rustenburg 1 SEA, two public participation meetings were held (RLM 2003). The first meeting took place on the 6th of February 2003 at the Protea Park NG Church Hall and was organised to inform I&APs about the SEA and to collect issues and concerns from focus groups (Refer to Plate 6.1). The focus groups included the developers, ROCLA, and conservation groups. The second meeting took place on the 18th March 2003 at the Reformed Church and was also organised to collect issues and concerns from I&APs. These two meetings followed the same procedure. The meetings began with a presentation from the professional team. This presentation introduced the client and rest of the team, explained the purpose of the study and process, clarified the study area, and discussed the data collection processes. The key stakeholders were then given the opportunity to raise their issues and concerns and make comments regarding the SEA.

The props which are used in the physical setting of the policy process are an important aspect of the concept of setting. Props can be seen as physical artefacts which are used to enhance the staging of a particular setting. It was noted that maps were an important prop which was used in the public participation meetings of all three SEAs. The public participation meetings of the KwaDukuza and

Rustenburg SEAs were initially deliberately organised or staged as expert driven and hierarchic with the public officials and environmental consultants as the experts and the key stakeholders as peripheral actors. This setting contributed to the passive way in which the SEA process scripted the role of key stakeholders as there is an unequal exchange of information. The key stakeholders are scripted to be the recipients of information as the assumption is made that they do not have the expertise to effectively deliberate with the experts. In order to enable the key stakeholders to deliberate with the experts, props were used to build the capacity of stakeholders. The public participation consultants employed maps as a prop to show the stakeholders "the areas where they are…and in this way people can relate" (Interview 1, Rustenburg 2). This methodology was staged for stakeholders with a "lower level of education" because "they must see their house first" (Interview 3, Rustenburg 2). Plate 6.1 shows the use of maps and posters during the focus group public participation meeting to stimulate key stakeholders to become more active. Hajer (2005c) argues that maps can be used as a centrepiece for a presentation as they can be used to intrigue and motivate actors to participate in the debate.

Plate 6.1: Focus group public meeting (RLM 2003: 76)

In the Small Craft harbour EIA, a number of public meetings were held in several venues, such as the Durban Ski Boat Club, which are close to the proposed development (Scott and Oelofse 2007). These

venues were chosen to facilitate accessibility to the stakeholders. The venues were set up in a cinema style seating with a public podium in front for the experts to address the stakeholders using power point presentations. Scott and Oelofse (2007) argue that this arrangement created a power relation between the experts and the stakeholders as the experts were positioned to be active, while the stakeholders were positioned as the passive audience.

The staging of KwaDukuza and Rustenburg SEAs are therefore strongly influenced by the physical setting of the policy process. This is because the physical setting of the policy process influences the power relations between the actors. For example, the use of municipal offices in the Rustenburg 2 SEA assigned some power and authority to the public officials as they are more comfortable in the familiar settings than the environmental consultants. The setting of the public participation meetings also influences the effectiveness of deliberation between state, consultants, and key stakeholders. For example, respondents from the KwaDukuza and Rustenburg SEAs emphasised the importance of ensuring that the venues are accessible to the key stakeholders. However, the technocratic procedure employed in the meetings diminishes the effectiveness of deliberation as the key stakeholders are scripted as the recipients of information. This process results in the key stakeholders becoming a passive audience during the meetings. In order to encourage the stakeholders to participate in the meetings, props were used in the KwaDukuza and Rustenburg SEAs. Maps were employed as a prop to stimulate discussion as the stakeholders' associate better with the maps than technical information or graphs.

The use of props are however not the only way that actors can influence the policy process. Actors can also engage in performances which bring about a shift in the scripting and organised interactions of the SEA process. The following section focuses on these performances.

6.5 Performance

The final concept of the performative dimension of policy making which was applied to the KwaDukuza and Rustenburg SEAs is performance. Hajer (2006: 49) defines performance as the "the way in which the contextualised interaction itself produces social realities such as understandings of the problem at hand, knowledge, new power-relations and trust". The interpretation of the case studies focuses the deliberately organised interactions which take place within a particular context and how these interactions redefines the problem, creates new knowledge, and shifts the existing

relationships of power and trust. Although every interaction in the KwaDukuza and Rustenburg SEAs can be considered a performance, only one of the performances was found to be an event which brought about a significant redefinition of the environmental problems in the SEA and shift in the trust and power relations between the actors.

The performances in the public participation meetings of the KwaDukuza and Rustenburg SEAs were found to be very similar as the key stakeholders were scripted and therefore staged to be passive in the three projects. The script of the SEA process limited their involvement to being informed about the project and raising their issues and concerns (Refer to Section 6.2.3). The technocratic nature of the script did not support deliberation between the key stakeholders and other actors over the environmental issues covered in the SEAs. In contrast, the public officials and environmental consultants were scripted and therefore staged to be more active in the three SEAs. The script of the SEA process defines the role of public officials as steering the project and the environmental consultants as managing the process (DEAT 2006). The technocratic setting of the public participation meetings contributed to the lack of involvement from the key stakeholders in the policy process. The interactions in public participation meetings were deliberately organised to reinforce the power relation between the state and consultants as the active actors and the key stakeholders as the passive audience. For example, technical information was presented to key stakeholders using power point presentations. This limited the effectiveness of deliberation as the majority of the stakeholders did not have the necessary expertise to meaningfully engage in the discussion.

The evidence collected from the interviews suggests that the staging of the first public participation meeting of the Rustenburg 2 SEA conformed to the technocratic script of the SEA process. This is because the process was driven by the public participation consultants and facilitated by the public officials and environmental consultants. This power relation does not support the formation of collaborative relationships or partnerships, and limits the key stakeholders' level of involvement to consultation (DEAT 2002; Chouguill 1996). One of the respondents from the SEA felt that the meetings were "just a technical presentation" and that "most of the people who come to the meetings are not technical" (Interview 5, Rustenburg 2). This is the reason that the respondent stated that the "public participation process was flawed" as the stakeholders "do not understand what is being said" (Interview 5, Rustenburg 2). Although props, such as maps, were employed to encourage stakeholder participation, the respondent felt that "awareness raising and capacitating" did not really have "that much impact" (Interview 5, Rustenburg 2). It is in this context that the following performance played out in the Rustenburg 2 SEA policy process.

The performance occurred during the second public participation meeting of the Rustenburg 2 SEA which was held on the 26 May 2005 at the Rustenburg municipal offices. The performance was initiated by the realisation of some key stakeholders that "no one was going to punish them for what ever they say" (Interview 4, Rustenburg 2). The stakeholders therefore began to meaningfully engage in the process and approach the environmental consultants to talk to them. One of the respondents felt that this point in the process came about because some of these stakeholders began to trust the environmental consultants (Interview 4, Rustenburg 2). A key moment in the performance is when a stakeholder from the local community approached one of the environmental consultants and said "come I'll take you" and "show you where the degradation has been done" (Interview 4, Rustenburg 2). Following the meeting, some of the stakeholders "took their time to show" the environmental consultants the places of illegal dumping and air pollution which had been discussed in the meeting (Interview 4, Rustenburg 2). This site visit closely resembles the performance which Hajer (2005c) discusses in the paper '*Setting the stage: A dramaturgy of deliberation*'. This paper focuses on the policy process over what to do with Hoeksche Ward, a major island in the Netherlands. AIR Southbound, a social movement, used a site visit by several experts, such as architects, politicians, and anthropologists, as a performance to decide how they should move on and to set the stage for future discussions. The performance was found to be very important as it mobilised key stakeholders which had been relatively passive prior to the site visit to be actively involved in the policy process.

The performance in the Rustenburg 2 SEA outlined above had a significant impact on the SEA policy process for three reasons. Firstly, the performance created a new understanding for the environmental consultants of the environmental problems which the SEA focuses on as they were able to view the problems themselves. This allowed the consultants to reframe the environmental problems within the context of their own understanding and experience. This is the reason that a respondent stated that "you have big eyes now that you have seen that" (Interview 4, Rustenburg 2). The site visit created a new social reality for the environmental consultants as environmental problems, such as environmental degradation, were no longer seen as a point on a map, but real issues on the ground which impact on the stakeholders' lives. Secondly, one of the respondents felt that the performance brought about a shift in the trust relationship as "some kind of trust levels developed" between the environmental consultants and specific key stakeholders (Interview 4, Rustenburg 2). A respondent felt that trust is an important element of the SEA policy process because people that are not suspicious of the process will be "supportive of the project" and "give you what you want" (Interview 3, Rustenburg 2). Lastly, the performance of a site visit brought about a 're-scripting' of the

technocratic power relation between the environmental consultants and specific key stakeholders. The consultants realised that some of the stakeholders could meaningfully deliberate over particular environmental issues pertinent to the SEA as they could draw on their local knowledge and personal experiences. Some of the stakeholders realised that the consultants were approachable and that they could engage with them over the environmental problems impacting on the local community (Interview 4, Rustenburg 2).

This performance illustrates the influence that a contextualised interaction, such as a site visit, can have on the SEA policy process. This is because a performance can produce a new social reality through a redefinition of the problem at hand and creation of new knowledge (Hajer 2006; 2005a). For example, in the Rustenburg 2 SEA the site visit created a new understanding of the environmental problems for the environmental consultants as they were able to interpret the problems in terms of their own experience and local knowledge. A performance also brings about a new social reality through the development of new power relations and trust (Hajer 2006; 2005a). For example, in the Rustenburg 2 SEA some of the key stakeholders began to trust the consultants and a more equitable power relation developed between the consultants and specific stakeholders. This performance therefore introduced a new script into the SEA process which shifted the staging of the project away from the original technocratic script.

In conclusion, the performative dimension of policy making focuses on the practices in the KwaDukuza and Rustenburg SEA policy processes. The four concepts which constitute the performative dimension are scripting, staging, setting, and performance. These concepts were applied to the three SEAs in order to understand the practices through which the discursive process of policy formation takes place and produces, reproduces, and transforms particular discourses, story lines, and policy vocabularies.

6.4 Conclusion

This chapter is the second of two chapters which present the results of this research. The results are largely based on the application of the conceptual framework provided by Hajer's (2006; 2005a) analytical model. There are two dimensions of policy making from the model which were applied to the KwaDukuza and Rustenburg SEAs. Chapter five presented the concepts which constitute the discursive dimension of policy making of the KwaDukuza and Rustenburg SEAs. The discursive

concepts which are applied are discourses, story lines, and policy vocabularies. Chapter six presents the concepts which constitute the performative dimension of policy making. This chapter discusses the KwaDukuza and Rustenburg SEAs in terms of four concepts; scripting, staging, setting and performance. Table 6.1 summarises the results of the application of these concepts to the three SEAs.

Table 6.1 Summary table of the results presented on the performative dimension of policy making

CONCEPT	CHARACTERISTIC	EVIDENCE FROM SEAs
Scripting	Main script	The technocratic SEA policy process outlined in the IEM SEA Guidelines (2006; 2004)
	Cues of appropriate behaviour	The SEA Terms of Reference and IEM SEA Guidelines (2006; 2004) determine the appropriate behaviour of public officials, environmental consultants, and key stakeholders in the policy process
	Actors	Project steering committee (For example, in the KwaDukuza SEA the steering committee included environmental consultants, public officials, and a representative of the DBSA) Stakeholder committee (For example, in the KwaDukuza SEA the stakeholder committee included public participation consultants and interested and affected parties, such as Simon Bundy and Di Jones)
Staging	Deliberate organisation of an interaction	The interactions in the Rustenburg SEAs were deliberately organised to follow the technocratic script of the SEA process. This script assigned a considerable amount of power and authority to the environmental consultants. In the Rustenburg 1 SEA the public officials reinforced this power relation as they limited their involvement in the policy process. In contrast, in the Rustenburg 2 SEA there were two deliberately staged events in which the public officials took back some of the power and authority assigned to the consultants. The master script of the Rustenburg SEAs limited the involvement of key stakeholders to consultation. This resulted in passive stakeholders as they had very little authority or influence on

		decision making processes.
	Symbols	The ward councillors in the Rustenburg 2 SEA were identified as a symbol of the new democracy which emerged in South Africa. The ward councillors represent the voice of the local community and act as a link between key stakeholders and government.
Setting	Physical setting	Project steering committee meetings were mostly held in the municipal offices for strategic reasons. However, a respondent did indicate that the venue was not that neutral as the consultants were not as comfortable as the public officials in those settings. Public participation meetings were generally held close to the community or study area, such as municipal offices, churches or schools. The meetings were generally staged according to the technocratic script with the state and consultants presenting technical information about the project using power point presentation, posters, and maps. The role of key stakeholders is limited to being the recipients of the information and raising their issues or concerns.
	Props	Maps were used as a prop in the three SEAs to stimulate the interest of key stakeholders and initiate deliberation
Performance	Contextualised interaction	The environmental consultants were guided around the study area by the community in the Rustenburg 2 SEA to point out the environmental problems that the SEA focuses on

There were a range of actors involved in the KwaDukuza and Rustenburg SEAs and included public officials, project consultants, and key stakeholders. The SEA policy process was identified as the main script of the KwaDukuza and Rustenburg SEAs as it brings the actors together and sets the stage in which the rest of the policy process plays out. The technocratic nature of the SEA process is defined by two cues which determine the appropriate behaviour of actors in the policy process. These cues are the IEM SEA Guidelines (2006; 2004) and each SEA's TOR. These cues defined the roles and responsibilities of the actors in the policy process.

Evidence collected from the interviews indicated that the three SEAs were deliberately staged to be a technocratic process. The environmental consultants were scripted to manage the project and played a dominant role in the policy process because of the lack of capacity in government and their expertise in undertaking a SEA. The public officials were scripted to steer the project and to determine the

outcome of the process as they would be implementing the project. The key stakeholders were scripted to play a passive role, and to raise their issues and concerns and make comments in the public participation meetings. Ward councillors were used as a symbol in the Rustenburg 2 SEA to attract key stakeholders to the public participation meetings. The meetings which were organised by the ward councillors were well attended as the key stakeholders view the councillors as a symbol of their representation in decision making processes.

The two most common settings in which the interactions between the actors in the SEAs took place were the project steering committee meetings and public participation meetings. The steering committee meetings were mostly held in the municipal offices. These venues were not deliberately chosen to give the municipal officials more authority and power than the consultants, but because of their strategic position. For example, the Rustenburg municipal offices are the most central venue between the offices of the NWPG and environmental consultants. The venues for public participation meetings were also chosen for their strategic positioning as the venues had to facilitate accessibility for stakeholders. These meetings were generally held in the municipal offices, churches, and school halls. It was noted that maps were used as a prop in the public participation meetings to make the information more accessible to stakeholders with lower education levels and to encourage deliberation.

The performances in the KwaDukuza and Rustenburg SEAs were found to be similar as the three SEAs applied the same technocratic script. However, a performance which occurred during the second public participation meeting of the Rustenburg 2 SEA introduced a more deliberative script to the policy process. The performance was a site visit in which some key stakeholders from the local community guided the environmental consultants around the study area. This performance had a significant influence on the policy process as it redefined the environmental problems contained in the SEA and shifted the trust and power relations between the environmental consultants and specific key stakeholders.

CHAPTER 7: DISCUSSION AND CONCLUSION

This chapter provides the conclusion for this study which examines the role of environmental consultants in municipal decision making processes. The summary of this study presented below concludes the research and provides a context for the two discussion points which are presented thereafter. These discussion points centre on the analysis of the role of environmental consultants in the KwaDukuza and Rustenburg SEAs and the applicability of discourse analysis in the interpretation of the three SEAs.

The aim of this research is to use a discourse analysis of the KwaDukuza and Rustenburg SEAs to understand the role of environmental consultants in the environmental policy processes. In order to fulfil the overall aim of this research, four objectives have been identified. Firstly, examine the discourses, story lines, and policy vocabularies which frame the KwaDukuza and Rustenburg SEAs. Secondly, understand the performance of the KwaDukuza and Rustenburg SEA policy processes. Thirdly, analyse the role of environmental consultants in the municipal environmental decision making, and lastly, determine the applicability of discourse analysis as an interpretive methodology applied to the KwaDukuza and Rustenburg SEAs.

Chapter two of this thesis presents the theoretical framework of this research and discusses the theory which is used to analyse the three case studies of the KwaDukuza and Rustenburg SEAs. The broad philosophy of the research is social constructivism which focuses on language as the unit of analysis and recognises that the social reality of actors is socially constructed (Terre Blanche and Durrheim 1999). Language is therefore not viewed as a transparent medium for communication, but embedded with meaning that actors use to construct and interpret their social reality. Interpretive analysis is a specific approach which can be applied in policy analysis and draws on the philosophical assumptions of social constructivism. In contrast to the positivist approach, interpretive analysis recognises that there is not a divide between knowledge creation and politics, and attempts to understand the constructions of meaning and way in which actors make sense of the world (Mottier 2005). Discourse analysis is a specific interpretive approach which provides an effective theoretical framework and methodology for interpreting how language or discourse is being used within a discussion (Hasting 1999). Dryzek (1997) argues that discourse analysis can be used to interpret the discourses which actors use to construct, interpret, discuss, and determine solutions for environmental problems. In more complex applications, discourse analysis can be used to understand the positioning of actors in

relation to one another, how language creates inequalities in power relations, and develops norms of acceptable behaviour (Hasting 1999). Hajer (2005d) argues that an argumentative discourse analysis can be used to interpret the bias in discourse and practices of the policy process. For example, discourse analysis can be used to reveal how actors are able to suppress competing discourses and advance their own interests through the definition of environmental problems and determining which solutions which are therefore appropriate. Argumentative discourse analysis is a specific approach to discourse analysis which focuses on how discourse is produced to position actors (Fischer and Forester 1993). Environmental politics is therefore interpreted as an argumentative struggle in which actors attempt to make sense of environmental problems and position other actors through policy arguments (Hajer 1995).

Hajer's (2006; 2005a) 'three-dimensional analytical' model is an argumentative approach to discourse analysis which can be applied to policy analysis. This model is applied as the theoretical framework of this research as it provides an effective approach to conceptualise and understand the language and practices in the case studies environmental policy processes. Two dimensions of this model, namely the discursive and performative dimensions, were applied to the KwaDukuza and Rustenburg SEAs. The first dimension is the discursive dimension of policy making and consists of three discursive concepts; *discourse*, *story lines*, and *policy vocabularies*. Discourse refers to the sets of ideas or concepts which are produced and reproduced in the practices of the policy process and used by the actors to construct and interpret their social reality (Hajer 1995). Story lines refer to a condensed narrative which brings together elements that were previously unrelated and provides a common point to which actors can attach their specific knowledge and expertise (Hajer 2003). Story lines are also a rhetorical device which actors use to express a specific discourse within policy discussions (Dryzek 1997). Policy vocabularies refer to the sets of concepts of a specific discourse which are embedded in an obvious way by actors within an environmental policy (Hajer 2003).

The second dimension is the performative dimension of policy making and consists of four concepts; *scripting*, *staging*, *setting*, and *performance* (Hajer 2006; 2005a). Scripting refers to the master script of the policy process and set of cues which determine the appropriate behaviour of actors. Staging refers to the deliberate organisation of interactions between actors. Staging also provides old and new symbols in the policy process and distinguishes between active actors and the passive audience. The setting refers to the physical location in which the interactions take place and props employed in these settings. Finally, performance refers to a contextualised interaction which brings about a redefinition of the problem, new knowledge, and shift in trust and power relations between actors.

This thesis also reviews several global and local environmental discourses as this would provide for the theoretical understanding of the discourses which this research aims to uncover. Dryzek (1997) provides a typology of global environmental discourses which consists of four discourses. These discourses are 'survivalism', 'environmental-problem solving', 'sustainability', and 'green radicalism'. Bond (1999) provides a typology of environmental discourses which emerged in South Africa post 1994. These discourses are 'orthodox economic growth', 'ecological modernisation', and 'environmental justice'.

The theory also provides an understanding of the three main actors in environmental policy making. These actors are the state, environmental consultants, and key stakeholders. The state represents a defined territory and society, is able to make legally binding decisions for society based on a set of core imperatives, and has a defined structure of individuals, organisations, and institutions (Dryzek *et al*. 2003). The set of core state imperatives are survival, domestic order, economic growth, and legitimacy, and are located at the core of the modern state. Peripheral imperatives, such as environmental protection, are often not seen as a core imperative and therefore located at the periphery of the modern state. Environmental consultants are non-state actors which are appointed on behalf of the state to undertake complex projects, such as a SEA, because the consultants have the necessary expertise, create a demand for their services, and because of a lack of accountability and capacity in government (Evers and Menkoff 2004). The term 'key stakeholders' is used to describe the general public as it takes into account the heterogeneity of the public and emphasises that the public have a 'stake' in the project (DEAT 2002). Although the state and environmental consultants also have a stake in the project, the term key stakeholder is limited to the general public in the context of this research. Chouguill (1996) and DEAT (2002) provide a continuum for understanding the levels of involvement between key stakeholders in environmental policy making. This continuum ranges from a one way exchange of information, such as protest or inform, to a two way exchange of information, such as partnership or empowerment.

However, the role of these actors in the environmental policy process is changing because of the shifts taking place in policy making from government to governance. This shift has created three challenges for policy making. These challenges are the emergence of new political spaces, conditions of radical uncertainty, and the importance of including a diverse range of actors in the policy process (Hajer and Wagenaar 2003). A consequence of the first two challenges is the opening up of policy making processes to non-state actors, such as environmental consultants and key stakeholders. A consequence of the third challenge is the redefinition of environmental policy making. Policy making

is no longer simply about problem closure, but finding socially acceptable solutions for well defined problems (Hajer 1995). These challenges have therefore shifted environmental policy making from a technocratic procedure to a deliberative process which uses reasoned dialogue and critical reflection (Vigar and Healey 2002).

Chapter three of this thesis discusses the background and case studies which provide a context for this research. This research uses two case studies; the KwaDukuza SEA and the Rustenburg SEA (Phase 1 and Phase 2). The case studies were chosen because of pressure that the rapid rate of development in the KwaDukuza and Rustenburg Municipalities is placing on environment (KLM 2006; RLM 2006a). In response to the development pressure, these two municipalities made the decision to undertake a SEA as a SEA supports development within the framework of sustainability (DEAT 2006). Economic and social development is one of the core imperatives of local government in post-apartheid South Africa. This is because the local government level is seen as the platform for development, service delivery, and transformation (Lemon 2002). There has also been a significant shift in the institutional structure at the local level away from hierarchal centralisation to governance and the subsequent creation of decision making structures which are more legitimate, transparent, and accountable than pre-1994. However, the changes have also created several capacity challenges for local government. The two greatest capacity challenges include a lack of individual capacity, such as knowledge, skills, or experience, and institutional capacity, such as leadership or relations (Cloete 2002; DPLG 2004).

The contextual chapter also reviewed several environmental management tools in addition to the SEA which are available to local government. These tools vary according to the type of activity and stage is the activities lifecycle where they are applied (DEAT 2004a). The three most commonly used tools include an EIA, an EMP, and a SEA. A SEA differs from an EIA because it is more strategic and not project specific, and does not concentrate on the impact of development on the environment, but the opportunities and constraints that the environment places on development (DEAT 2004b). As there is no accepted definition of a SEA, several principles are used to guide SEA practice in South Africa (Retief *et al*. 2007a). According to DEAT (2006; 2004b) and based on these principles, a SEA should be driven by sustainability, be flexible, strategic, and participatory, and identify the opportunities and constraints that the environment places on development. Due to the complexity of a SEA, SEA practice in South Africa is driven by environmental consultants. This is due to the lack and fragmentation of capacity in government and because environmental consultants have the necessary capacity, expertise, and experience (Retief *et al*. 2007b).

Chapter four of this thesis outlines the methodological approach used in the collection and interpretation of data for this research. The methodology is based on the interpretive approach of discourse analysis which draws its philosophical assumptions from social constructivism. Hajer's (2006; 2005a) analytical model provides a robust conceptual framework and methodology for interpreting the language and practices of the KwaDukuza and Rustenburg SEAs. The chapter describes the two dimensions to this model and several concepts within each dimension. The way in which these concepts are applied to the three SEAs is also discussed.

A purposive sampling technique was adopted to identify the public officials, environmental consultants, and key stakeholders who were interviewed using an interview guided approach. The other key primary data sources included the SEAs, books, journals, and unpublished thesis. The oral data collected from the interviews and SEAs were interpreted using Dey's (1993) 'omelette' approach as this methodology does not only focus on the similarity or differences in the data, but the connections between the data. The chapter outlines the three stages of this interpretive approach; description, classification, and connection. A thematic approach was adopted in which three main limitations were encountered in this research. These limitations are the subjectivity of the data collected as the researcher plays an important role in the co-construction of knowledge, the position of the researcher in relation to the respondents, and factors, such as the distance of the Rustenburg case study from Durban which influenced the scope of data collection and interpretation.

Chapter five of this thesis is the first of two chapters which present the results of this research. The chapter focuses on the three concepts of the *discursive dimension of policy making* which were applied to the KwaDukuza and Rustenburg SEAs. These concepts are discourse, story lines, and policy vocabularies.

Evidence collected from the interviews with public officials, environmental consultants, and key stakeholders indicated that the three SEAs are framed by the discourse of 'ecological modernisation'. This discourse draws on the principles of 'sustainability' and presents a focused strategy to dissolve the conflict between development and environmental protection (Bond 1999; Dryzek 1997). The SEA is an example of a tool that aims to manage this conflict. It was found that the ecological modernisation discourse which frames the three SEAs reflects the characteristics of weak ecological modernisation and some characteristics of a shift to strong ecological modernisation. This finding is supported by Christoff (1996) who argues that the weak characteristics of ecological modernisation can sometimes provide a basis for a shift towards strong ecological modernisation.

The interpretation of 13 story lines which were identified through a deductive approach using four broad themes concluded that ecological modernisation is the framing discourse of the three SEAs. The story lines which emerged from the interviews provide evidence to support the findings that ecological modernisation is the framing discourse of the SEAs and reflect the characteristics of both weak and a shift towards strong ecological modernisation. The proposed four themes were based on the aim and objectives of this research which are to analyse the language and practices of the policy process, and therefore the role of environmental consultants in environmental policy making. The themes are '*what is an SEA?*', the '*need for a SEA*', the '*need for consultants*', and the '*role of actors in a SEA*'.

The story lines in the 'what is an SEA?' theme that emerged from the interviews define a SEA as a strategic decision making tool, which takes into account the carrying capacity of the environment for development, and attempts to balance competing biophysical, economic and social issues. The story lines in the 'need for a SEA' theme indicate that a SEA was needed in the KwaDukuza and Rustenburg SEAs because of the rapid rate of development in these two municipalities, the impact of development on the environment, and to integrate environmental considerations into policy and planning processes. The story lines in the 'need for consultants' theme justify the appointment of environmental consultants to undertake the SEAs. The story lines show that environmental consultants were needed because the consultants are seen as specialists, the lack of capacity in the municipalities, and to shift accountability away from government. The story lines in the 'role of actors in a SEA' theme emphasise that environmental consultants undertake the majority of the work, all the actors integrate various sources of information to the SEAs, and the public officials and environmental consultants play an important role in ensuring that the SEA is a quality product. These story lines indicate that environmental consultants have been appointed to undertake the SEAs on behalf of the state because of the complexity of the policy process and lack of capacity in government (Retief *et al*. 2007a; 2007b; DEAT 2006). The inclusion of non-state actors in the policy process reflects a shift towards governance as the consultants play a greater role in the running of government (Hajer and Wagenaar 2003). The consultants also a play a more influential role in decision making processes through the use of language and performances (Hajer 2006; 2005a; 1995).

There are three *policy vocabularies* which emerged from the analysis of the KwaDukuza and Rustenburg SEAs. These vocabularies also support ecological modernisation as the framing discourse of the three SEAs as they reflect the sets of concepts of ecological modernisation which actors conspicuously employ in the SEAs. The three policy vocabularies are '*developmental*',

'*management*', and '*environmental*'. The 'developmental' policy vocabulary consists of two concepts 'economic' and 'development'. These concepts, which were quite dominant in the data collected, show the strong economic influence of legislation and policies, such as the IDP, on the SEAs. The 'management' policy vocabulary consists of four concepts. These concepts are 'manage', strategic', 'plan', and 'policy' and reflects the strategies that the municipalities can use to manage the conflict between development and the environment. The final vocabulary is the 'environmental' policy vocabulary which consists of three concepts; 'sustainable', 'natural', and 'ecological'. These concepts reflect the emphasis on the biophysical environment in the three SEAs.

Chapter six of this thesis is the second of two chapters which present the results of the research. This chapter focuses on the four concepts of *the performative dimension of policy making* which were applied to the KwaDukuza and Rustenburg SEAs. The four concepts are scripting, staging, setting, and performance. The main or master script of the KwaDukuza and Rustenburg SEAs was found to be the SEA process as the process brought all the actors together and provided the sets of cues which determined the actors' appropriate behaviour. Evidence reveals that the there are several actors involved in the policy process and includes public officials, environmental consultants, and key stakeholders. The script of the SEA process is largely defined or 'written' by two cues; the TOR of each SEA and the IEM SEA Guidelines (2006; 2004). These cues determine the actors' appropriate behaviour because they define the role and responsibilities of the actors in the policy process.

The analysis revealed that the interactions in the KwaDukuza and Rustenburg SEAs were found to be deliberately organised or staged as a technocratic procedure. It is evident that the environmental consultants were scripted to play a dominant role in the management of the policy process, while the public officials play a dominant role in steering the project. The evidence reveals that the key stakeholders were passive as the script limited their involvement to consultation. It was observed that a new symbol emerged in the Rustenburg 2 SEA. The new ward councillors were used as a symbol of democracy to encourage key stakeholders to attend the public participation meetings and engage in the policy process.

Evidence revealed that the settings in which the interactions between actors mostly took place are in two types of meetings. These are the project steering committee meetings which mostly took place in the municipal offices and the public participation meetings which took place in church halls, school halls, and the municipal offices. It was noted that maps were used as a prop during the public participation meetings to encourage key stakeholders to engage in the policy process.

Most of the performances in the KwaDukuza and Rustenburg SEAs were found to support the technocratic script of the SEA process. However, it was noted that one performance in the Rustenburg 2 SEA introduced a new script to the process as it brought about a new social reality with the development of new knowledge, trust, and power relations between the environmental consultants and specific key stakeholders. The site visit was a performance in which some key stakeholders guided the environmental consultants around the study area and highlighted the issues which the SEA focuses on.

In conclusion, the research found that the three SEAs were framed within an ecological modernisation approach to managing the conflict between the environment and development. Although this approach was characterised as a weak ecological modernisation discourse, it was found that there is a shift to strong ecological modernisation. Both the weak and strong elements are a product of the South African context. The weak elements reflect the technocratic approach to policy making inherited from the apartheid government, and strong economic imperative and the instrumental view of the environment of the post 1994 government (Oelofse *et al*. 2006; Bond 1999). The strong elements of ecological modernisation are driven by the principles of sustainability and environmental justice which support policy making which is deliberative and democratic, and ecologically based (Bond 1999; Dryzek 1997). The conclusion presented above provides a basis for the following discussion and relates to the final two objectives of this research. The two discussion points which are raised here are the applicability of discourse analysis in environmental policy making and the role of environmental consultants in municipal environmental decision making. These points relate to objectives three and four of the research.

The Application of Discourse Analysis in Environmental Policy Making

This research has applied Hajer's (2006; 2005a) analytical model which provides the methodological approach of discourse analysis. The model focuses on language or discourse and the practices in which the language is used. Discourse analysis provides an effective methodology for understanding the role of environmental consultants through the application of the concepts related to the discursive and performative dimensions of policy making. Discourse analysis provides the method for uncovering the discursive dimension which consists of three concepts; discourse, story lines, and policy vocabularies. The concepts are used as a framework to reveal how environmental consultants influence the environmental policy process through the use of language. The performative dimension

consists of four concepts; scripting, staging, setting, and performance. The concepts are used to reveal how environmental consultants influence policy making through the roles they play in the performance of the policy process.

Hajer (2005d) argues that discourse analysis provides a useful approach to policy analysis for two reasons. Discourse analysis can be used to reveal the role of language in the environmental policy process and can be used to reveal the bias in the environmental policy making. Language is an important unit of analysis in the policy process because it is not only a transparent medium for communication among actors, but shapes the way in which actors interpret reality (Terre Blanche and Durrheim 1999). The interpretation of the KwaDukuza and Rustenburg SEAs using the method of discourse analysis revealed that the three SEAs are framed within an 'ecological modernisation' discourse. This finding allows for the understanding of the way in which this discourse structures the way in which the actors in the three SEAs define, interpret, and determine the appropriate solutions for the environmental problems that the SEAs focus on. The evidence revealed that the three SEAs showed some of the characteristics of what Christoff (1996) refers to as a discourse of 'weak' ecological modernisation. This is because the SEAs were found to be largely technocratic, instrumental, and technological (Oelofse *et al*. 2006; Christoff 1996).

The KwaDukuza and Rustenburg SEAs were found to be technocratic processes because a weak 'ecological modernisation' discourse supports policy processes which are driven by the state and experts, and with limited public participation (Karkkainen 2004; Vigar and Healey 2002; Keeley and Scoones 2000; Hajer 1995) (Refer to Section 6.2.2). Within this discourse, the public officials and consultants assume that environmental protection is the responsibility of the state and the issues are to complex for the general public to understand (Oelofse *et al*. 2006; Dryzek 1997). The three SEAs were found to be instrumental since they support a policy process which interprets the biophysical environment in terms of resources or assets. This is characteristic of a weak 'ecological modernisation' discourse. The SEAs were also found to be technological, supporting the weak ecological modernisation discourse which limits the appropriate solutions to environmental issues which to technical solutions. Within this discourse, the state and consultants assume that environmental policy making is a rational exercise and use technical knowledge and policy instruments to determine solutions for specific policy problems (Vigar and Healey (2002). The solutions are therefore technical as they reflect the interests and assumptions of the experts involved in the policy process.

However, although the oral evidence collected from the interviews indicates that public participation was limited in the KwaDukuza and Rustenburg SEAs, the rhetoric used by the respondents indicates that public participation is viewed as an important process (Refer to Section 6.2.2). Oelofse *et al*. (2006) argue that this rhetoric represents strong ecological modernisation, which support democratic public engagement. This shift is emerging in parallel to the dominant features of weak ecological modernisation which is entrenched in the environmental management legislation in South Africa. The importance placed on public participation is in itself important an indication of a shift to strong ecological modernisation. Thus, although the respondents felt that meaningful public participation is important because environmental policies need the support of civil society to be effectively implemented, there were reservations about the effectiveness of the participation process. The evidence also indicated that some sectors of civil society, notably marginalised communities, are unable to meaningfully participate in policy processes because of a lack of capacity.

Christoff (1996) argues that the strong and weak characteristics of ecological modernisation are not mutually exclusive as binary opposites, but rather found on a continuum. This is because weak features can sometimes provide a basis for strong features of strong ecological modernisation. This raises the question of where SEA practice in South Africa lies. Based on the oral evidence collected from the interviews with public officials, environmental consultants, and key stakeholders, and interpretation of the SEAs, there appear to be a common discourse which frames all three SEAs. It was found that the KwaDukuza and Rustenburg SEAs exhibit characteristics of weak ecological modernisation, but some shifts to strong ecological modernisation. The characteristics of weak ecological modernisation support a positivist approach to defining and seeking solutions to environmental problems and emphasise the central role of the state and experts in the SEA process, while the importance of public participation in the process reveals the shift to strong ecological modernisation. Discourse analysis is the methodology applied here which allows for this important evidence to be revealed. Discourse is also used to examine the story lines which actors use in policy discussions and the policy vocabularies which actors employ in policy (Refer to Section 5.3 and 5.4). There is ample evidence to show that actors in the KwaDukuza and Rustenburg SEAs use these rhetorical devices to frame the three SEAs clearly within the 'ecological modernisation' discourse. These rhetorical devices were interpreted in this research using the continuum of ecological modernisation presented by Christoff (1996).

Discourse analysis also provides a theoretical framework and methodology to reveal the exertion of power in the policy making process. The bias in power arises because of what Hajer (1995) refers to

as ‘mobilisation bias’. Mobilisation bias occurs when actors advance their own discourses and actively suppress the emergence of competing discourses. The interpretation of the KwaDukuza and Rustenburg SEAs revealed that power is evident in the language and practices of the policy process. Discourse analysis is therefore effective in interpreting the application of power in the policy process and has been employed here to apply the four concepts of scripting, staging, setting, and performances (Hajer 2006).

The interpretation of the scripting of the KwaDukuza and Rustenburg SEAs can be used to understand the way in which the power relations of the policy process influence the production and reproduction of discourse. The master script of the three SEAs is the SEA process which is defined by two cues; the SEAs’ TOR and the IEM SEA Guidelines (2006; 2004). The Guidelines determine the appropriate behaviour of actors as they outline the roles and responsibilities of the actors in the policy process (Refer to Section 6.2.2). For example, the public officials are scripted to steer the project. The Guidelines also recommend the appointment of environmental consultants due to the lack of capacity and fragmentation in government (DEAT 2006). It was found that the public officials in the three SEAs limited their involvement because of capacity constraints and accountability. Retief *at al*. (2007a) found that all the SEAs commissioned by government in South Africa appointed external consultants because the expertise in undertaking a SEA lies in the private sector. The script therefore assigns a considerable amount of power and authority to the environmental consultants. This power allows consultants to introduce and advance their own language or discourses in the policy process and suppress the emergence of competing discourses. The discourse analysis undertaken in this thesis therefore provides a means of revealing the argumentative nature of environmental policy making.

It is important to analyse the deliberately organised interactions in the policy process as these interactions distinguish the active actors from the passive actors which form part of the audience. For example, the public participation meetings in the Rustenburg 1 were scripted to follow the technocratic procedure of the SEA process. The procedure of the meeting was interpreted as being technocratic as the panel of experts began the meeting by introducing the panel and explaining the purpose of the project and data collection methods. The key stakeholders were then given the opportunity to raise their issues and concerns, and make comments regarding the project (Refer to Section 6.2.2). The separation of the experts from the audience and sequence of the meeting was found to reinforce the power relation between the public officials and environmental consultants, and the key stakeholders. These organised interactions therefore limit the extent to which key stakeholders are able to advance their language or discourse in the policy process and suppress

competing discourses. These procedures are common practice in environmental policy making in South Africa, but it is the application of discourse analysis that makes explicit the often veiled exercise of power in these processes (Scott and Oelofse 2007). An understanding of such processes provides potential for creating more deliberative and democratic public participation processes.

The interpretation of the physical setting of the interactions can also be used to understand the power relations in the policy process. For example, the project steering committee meetings of the Rustenburg 2 SEA were held in the municipal offices. Although this venue was chosen for strategic reasons, one of the respondents felt that the venue was not neutral as the public officials feel more comfortable in the familiar surroundings than the environmental consultants (Refer to Section 6.2.3). The public officials therefore have more power and authority within these familiar settings and are able to advance their own language or discourses. The application of discourse analysis in this research provides a means for understanding the influence of setting on the production and reproduction of discourse.

Discourse analysis can also make explicit the emergence and dominance of new competing discourses. The advance of these discourses can be interpreted through the performances of the policy process as Hajer (2006) argues that policy making is a series of staged events. These performances can be interpreted as contextualised interactions which shift the power relations between actors as they create a new social reality in which new discourses can emerge. For example, in the Rustenburg 2 SEA a site visit was interpreted as a performance because it created a new social reality for the environmental consultants and shifted the trust and power relations between the consultants and specific key stakeholders (Refer to Section 6.2.4). This performance advanced a discourse which supports the principles of environmental justice and suppressed the technocratic discourse which dominated the policy process.

The findings of this research illustrate how discourse analysis can be used to understand how language and policy performance frame and define the outcomes of the environmental policy processes. The discussion in the final section will address the aim of this thesis which is to understand the role of environmental consultants in municipal environmental decision making. The following section discusses the role of environmental consultants in the KwaDukuza and Rustenburg SEAs and how these policy processes influence municipal decision making.

The Role of Environmental Consultants in Environmental Policy Making

The aim of the research is to use a discourse analysis of the KwaDukuza and Rustenburg SEAs to understand the role of environmental consultants in municipal environmental decision making. In the context of this research, the three SEAs are defined as environmental policies because they provide a strategic framework which informs municipal environmental decision making. The definition of a SEA as a decision making framework is supported by the 'SEA as a decision making tool' story line which emerged from oral data collected from the interviews (Refer to Section 5.3.1). The influence of environmental consultants in the production of the KwaDukuza and Rustenburg SEAs therefore also indirectly influences municipal decision making processes based on the SEA. The increase in the involvement of non-state actors, such as environmental consultants, in environmental policy processes is the result of three policy making challenges. The challenges as discussed in Section 2.5.1 are the conditions of radical uncertainty, the emergence of new political spaces, and the importance of difference in the policy process (Hajer and Wagenaar 2003).

The first challenge is the condition of radical uncertainty in which policy making in the KwaDukuza and Rustenburg Municipalities takes place (Hajer and Wagenaar 2003). There is a growing recognition that environmental problems are more complex than simple cause and effect relationships (Dryzek 1997). This creates a challenge for local government because the interconnected and multi-dimensional nature of environmental problems is often beyond the scale, experience, and institutional structures of public officials, especially in small municipalities. In the context of radical uncertainty, the government therefore commissions non-state actors, i.e. environmental consultants, to integrate their skills, experience and resources into environmental policy processes on their behalf (Retief *et al*. 2007a; DEAT 2006). The increase in the employment of environmental consultants in South Africa can also be explained by the legislative reform process which requires the inclusion of environmental considerations in policy processes (Retief *et al*. 2007b). The employment of environmental consultants in complex environmental policy processes, such as SEA, is supported by the 'environmental consultants are specialists' story line (Refer to Section 5.3.3). This story line indicates that environmental consultants are used on the KwaDukuza and Rustenburg SEAs because of the expertise, experience, and ability to focus on environmental issues.

The second challenge to environmental policy making in the KwaDukuza and Rustenburg Municipalities is the emergence of new political spaces in which policy making takes place (Hajer and Wagenaar 2003). The emergence of new political spaces at the local level in South Africa is the

result of the restructuring of local government. The local government level has been significantly restructured since 1994 to accommodate its role as a platform for transformation, development, service delivery, and in encouraging economic growth (Buthelezi and Dollery 2004; Lemon 2002). However, the restructuring of local government has created several capacity challenges. These challenges include a lack of individual capacity such as skills, training, or experience, and institutional capacity such as enough staff, effective structures and systems, or prevailing institutional memory (Walmsley 2005; Cloete 2002; DPLG 2004). These capacity challenges are reflected in the 'lack of capacity in local government' story line (Refer to Section 5.3.3). Thus the findings of the empirical study provide evidence in support of environmental governance literature.

The capacity challenges in the KwaDukuza and Rustenburg Municipalities are compounded by the rapid rate of development and increasing work load of public officials. One of the respondents from the KwaDukuza SEA indicated that the rapid rate of development forces public officials "to make hasty decisions" (Interview 2, KwaDukuza). This situation creates what Hajer (2006) refers to as 'institutional ambiguity' because there is a growing recognition in local government that effective environmental policy making may be beyond the capacity of traditional policy making processes. In this situation, local government appoints non-state actors, i.e. environmental consultants, to assist in producing effective policy solutions to complex environmental problems. However, in the context of this new relationship, the rules for policy making cannot be assumed and have to be established within the policy process (Hajer 2006). In this context the increasing reliance on environmental consultants as a solution to capacity problems and as evidence of broader corporatisation through outsourcing, the knowledge economy is confirmed in this research.

The final challenge to environmental policy making in the KwaDukuza and Rustenburg Municipalities is the incorporation of many different stakeholders into the policy making process (Hajer and Wagenaar 2003). There is a significant challenge facing local government in South Africa to move away from its former role during apartheid as a centralised instrument of racial segregation and social change (Rossouw and Wiseman 2004). Following 1994, local government has experienced a considerable shift in its role to ensure decentralisation, legitimacy, transparency, and accountability. This change has largely been driven by the 'environmental justice' discourse which supports responses to the environmental inequalities and injustices of apartheid (Bond 1999). This discourse aims to include individuals and communities in the policy processes which affect them (Hallowes and Butler 2002). This discourse is reflected in the Constitution of South Africa (Act 106 of 1996) and

NEMA (Act 107 of 1998) which support public involvement in legislative and other processes at the national, provincial, and local government levels.

The involvement of different stakeholders in the environmental policy process creates a situation which Hajer (2006) refers to as 'multi-signification'. The situation arises because stakeholders draw on different systems of meanings based on their communities, life styles, ideologies and experiences, to makes sense of environmental problems. In this situation, stakeholders need to negotiate the definition and solutions to environmental problems because conflict over meanings and understandings arise. Contestation is therefore inevitable. The capacity to deal with the issue of conflictual interests and meanings is increasingly being shifted to consultants (environmental and public participation) so that economic, social, and environmental issues can be integrated. There is also evidence to suggest that there are a small growing number of specialist consultants emerging in the environmental field, such as social impact assessment consultants (Scott and Oelofse 2007).

As a result of these three environmental policy challenges facing the KwaDukuza and Rustenburg Municipalities, there has been a growing demand in local government for the services offered by environmental consultants. The demand is growing because environmental consultants are specialists, the lack of capacity at the local level, and the need to include a range of different stakeholders in the policy process. This research thus found that the demand for environmental consultants in environmental policy making creates reliance on and increases the importance of consultants in the policy process.

For this reason, the majority of the respondents describe the role of environmental consultants as project managers who drive the policy process. The oral data collected from the interviews indicates that the role of environmental consultants in the KwaDukuza and Rustenburg SEAs is basically to do the work. The 'environmental consultants do the work' story line indicates that the environmental consultants are the service providers and therefore responsible for collecting existing information, integrating specialist reports, including the issues and concerns from the public participation process, and compiling the SEAs (Refer to Section 5.3.4). In contrast, the public officials are responsible for steering or directing the project. The responsibilities of public officials include assisting the environmental consultants to gather existing information, provide government input, and ensure the SEA aligns with existing policies and plans. The main responsibility of government as the client is to ensure that the SEA is a quality product that it satisfies the needs of the municipality.

However, contrary evidence collected from the interpretation of the KwaDukuza and Rustenburg SEAs indicates that public officials may get too involved in the management of project; causing conflict at times (Refer to Section 5.3.4). Gable (1996) argues that this situation is often the result of poor communication between the clients and contractors. The clients and contractors need to establish at the beginning of the project what the 'rules of the game' are to avoid conflict. For example, public officials often advance discourses which support the core imperatives of the state, such as economic growth, while environmental consultants support the peripheral imperatives, such as environmental protection (Dryzek *et al*. 2003). This conflict is again the result of what Hajer (2006) refers to as 'institutional ambiguity'. In the context of 'institutional ambiguity', the actors cannot assume what each actor's role and responsibilities in the policy process should be, but develop the rules through deliberation in the process. Although the environmental consultants are found to have autonomy in the management of the SEA policy process, the public officials, as the clients, still play a dominant role in determining the outcome of the process (Refer to Section 5.3.4).

At present the relationship between local government and environmental consultants is based on the economics of supply and demand. There is a demand for environmental consultants because of capacity problems in local government and consultants provide a necessary service (Refer to Section 5.3.3). The results indicate that in the short term local government should concentrate on streamlining the way in which consultants are used in existing institutional structures. Environmental consultants should therefore be used to plug the capacity gaps in local government. Karkkainen (2004) argues that the excessive and prolonged use of non-state actors to fill the gaps in government shifts environmental decision making away from a hierarchal institutional structure to a fluid policy network in which the division between the role of the state and non-state actors becomes blurred. However, the excessive use of environmental consultants also creates a reliance on consultants and reduces the need for local government to build its own capacity. The use of consultants therefore becomes counter productive as municipalities get less value from municipal resources in the long term. Karkkainen (2004) argues that the use of non-state actors only becomes meaningful for the state if the interactions are not once-off advisory exercises and were there is continuous learning. The respondents in the study felt that local government should concentrate on building in-house capacity. Building capacity is however difficult because of a high staff turn over as public officials often leave to join other municipalities or the private sector once they have been trained (Refer to Section 5.3.3). In addition, funding is often not available to attract competent environmental specialists and the municipal council, which allocates departmental budgets, does not prioritise environmental issues.

The employment of environmental consultants in environmental policy processes also creates several issues. The first problem is the consultants are often not local and therefore not familiar with the particular municipal area. The public officials, as the clients, need to ensure that the SEA includes all the local issues. Evers and Menkoff (2004) however argue that external consultants can also be used to introduce new ways of thinking or framing of environmental problems. The use of external consultants also brings transparency and impartiality to the policy process (Refer to Section 5.3.3).

Blake and Mouton (1990) argue that public officials may also use environmental consultants to legitimate political action and offload accountability. Evidence collected from the interpretation of the KwaDukuza and Rustenburg SEAs suggests that some public officials limited their level of involvement in the SEAs as this limits their accountability. The IEM SEA Guidelines (2006) argue that public officials need to be actively involved in the SEA process as this improves the effectiveness of the SEA and its implementation. The public officials need to appoint environmental consultants to do the specialist work as sub-contractors. In this situation, the consultant would act as a facilitator to bring some independence to the policy process (Refer to Section 5.3.3). The research has shown that environmental consultants should therefore play an advisory role in the policy process and not to replace local government. The role of consultants is not to manage the process, but to provide input and advice. The capacity challenges at the local government level however prevent the public officials from efficiently managing the process.

Despite the challenges of building capacity in local government, there is a strong drive in the KwaDukuza Municipality to build an environmental department which would operate independent of other municipal departments. At the time of writing, there was only one environmental officer who is located in the town planning department of the municipality. Sowman (2002) argues that independent environmental departments may affect the streamlining of environmental policy making because of their autonomy and positioning in the process. The results show that it is important to train everyone, especially town planners, on environmental issues. This institutional structure would support the independence of a specialist environmental department and streamline development applications because other actors, such as town planners, would have some level of environmental knowledge. A further suggestion was that town planning and environmental departments should be combined in order to streamline the development process and remove many of the problems with the current institutional structure. However, Sowman (2002) argues that environmental issues may become diluted within this institutional arrangement as there may be a weak concentration of environmental expertise.

The question that needs to be posed in the South African context is that with the environmental consultants increasingly filling the capacity gaps, to what extent do they begin to take on the role of local government in environmental decision making processes and how far have environmental consultants brought environmental issues to the core of the state?

The evidence collected from the interviews with public officials, environmental consultants, and key stakeholders indicates that the consultants play a central role in the environmental policy processes. The SEA process in South Africa assigns a considerable amount of power and authority to the consultants over the policy process. This power is reflected in the way that the dominant language or discourses used by the consultants frame the SEA policy processes and define the problems and their solutions. The language or discourses employed by the consultants therefore influences municipal environmental decision making as the decisions are informed by policies which define environmental issues and their solutions in terms of the discourses of the consultants. However, it was found that this does not mean that municipal environmental decision making is only influenced by the discourses of consultants. This research found that the public officials are also strongly influenced and guided by the core imperatives of the state, such as economic growth, which are reflected in legislation, such as the Constitution of South Africa (Act 106 of 1996) and policy, such as the IDP. The developmental role of local government in South Africa therefore limits the extent to which environmental consultants bring environmental issues to the core of the state.

The evidence collected from the interviews indicates that environmental consultants to some extent take on the role of local government in environmental decision making processes. The public officials employ consultants on their behalf for several reasons. Firstly, the increase in uncertainty regarding environmental issues and capacity constraints creates a need for consultants because of their skills and expertise. Secondly, the shift from government to governance has created new political spaces and capacity challenges for the state which creates a need for environmental consultants. Thirdly, the increase in the importance of including a range of stakeholders in the process creates a need for consultants as they are able to integrate competing interests and assumed to be impartial or neutral. In this situation, environmental consultants would not only fill the capacity gaps in local level, but begin to have the power and authority to play the role of local government. This raises the question about the emergence of a ‘consultancy state’ in South Africa in which environmental consultants would then be seen as taking on the duty and responsibilities of municipal public officials in environmental decision making processes.

REFERENCES

Axtmann R. (2004), The State of the State: The Model of the Modern State and its Contemporary Transformation, in *International Political Science Review*, (25: 3), pgs. 259-279

Arnstein S. (1969), A Ladder of Citizen Participation, in *Journal of the American Institute of Planners*, (35: 4), pgs. 216-224

Babu S.C. (2000), Capacity Strengthening in Environmental and Natural Resource Policy-Analysis: Meeting the Changing Needs, in *Journal of Environmental Management*, (59), pgs. 71-86

Baker S., Kousis M., Richardson D. and Young S. (1997), Introduction: the Theory and Practice of Sustainable Development in EU Perspective, in Baker S. (Ed.), *The Politics of Sustainable Development: Theory, Policy and Practice within the European Union*, Routledge, London

Bäckstrand K. (2003), Civic Science for Sustainability: Reframing the Role of Experts, Policy-Makers and Citizens in Environmental Governance, in *Global Environmental Politics*, (3: 4), pgs. 25-41

Bingham L.B., Nabatchi T. and O'Leary R. (2005), The New Governance: Practices and Processes for Stakeholder and Citizen Participation in the Work of Government, in *Public Administrator Review*, (65: 5), pgs. 547-558

Blake R.R. and Mouton J.S. (1990), *Consultation: The Handbook for Individual and Organization Development*, (2nd Ed), Addison-Wesley Publishing, United States of America

Bond P. (2000), *Elite Transition: From Apartheid to Neoliberalism in South Africa*, University of KwaZulu-Natal Press, Pietermaritzburg

Bond P. (1999), *Economic Growth, Ecological Modernisation or Environmental Justice*, Paper presented at Union of Radical Economics Conference "Political Economy, the Environment and Economic Crisis", Bantam, Conneticut in August 1999

Britz J.J., Lor P.J., Coetzee I.E.M. and Bester B.C. (2006), Africa as Knowledge Society: A Reality Check, *The International Information & Library Review*, (38), pgs. 25-40

Bulkeley H. (2005), Reconfiguring Environmental Governance: Towards a Politics of Scales and Networks, in *Political Geography*, (24), pgs. 875-902

Buthelezi A. and Dollery B. (2004), An Exploratory Analysis of Local Government Failure in South Africa, in *J.Stud.Econ.Econometrics*, (28: 2), pgs. 91-106

Buttel F.H. (2000), Ecological Modernisation as Social Theory, in *Geoforum*, (31), pgs. 57-65

Candler G.C. (2000), The Professions and Public Policy: Expanding the Third Sector, *International Political Science Review*, (21:1), pgs. 43-58

Chaker A., El-Fadl K., Chamas L., and Hatjian B. (2006), A Review of Strategic Environmental Assessment in 12 Selected Countries, in *Environmental Impact Assessment Review*, (26), pgs. 15-56

Chipkin I. (2002), A Developmental Role for Local Government, in Parnell S., Pieterse E., Swilling M. and Wooldridge D. (Eds.), *Democratising Local Government: The South African Experiment*, University of Cape Town Press, Cape Town

Chouliaraki L. and Fairclough N. (1999*), Discourse in Late Modernity: Rethinking Critical Discourse Analysis*, Edinburgh University Press, Edinburgh

Choguill M.B.G. (1996), The Ladder of Community Participation for Underdeveloped Countries, in *Habitat International*, (20: 3), pgs. 431-444

Christoff P. (1996), Ecological Modernisation, Ecological Modernities, in *Environmental Politics*, (5:3), pgs. 476-500

Cloete F. (2002), Capacity-Building for Sustainable Local Governance in South Africa, in Parnell S., Pieterse E., Swilling M. and Wooldridge D. (Eds.), *Democratising Local Government: The South African Experiment*, University of Cape Town Press, Cape Town

Cloke P., Cook I., Crang P., Goodwin M., Painter J. and Philo C. (2004), *Practicing Human Geography*, Sage Publications, London

Connick S. and Innes J.E. (2003), Outcomes of Collaborative Water Policy Making: Applying Complexity Thinking to Evaluation, in *Journal of Environmental Planning & Management*, (46:2), pgs. 177-197

Connick S. and Booher D.E. (2003), Collaborative Policy Making: Governance through Dialogue, in Hajer M. and Wagenaar H. (Eds.), *Deliberative Policy Analysis: Understanding Governance in a Network Society*, Cambridge University Press, Cambridge

Cowell R. (2003), Substitution and Scalar Politics: Negotiating Environmental Compensation in Cardiff Bay, in *Geoforum*, (34), pgs. 343-358

Crang M. (2005), Analysing Qualitative Data, in Flowerdew R. and Martin D. (Eds.), *Methods in Human Geography*, (2nd Ed.), Pearson Education, London

De Beaugarde (1997), The Story of Discourse Analysis, in Van Dijk T.A. (Ed), *Discourse as Structure and Process*, Sage Publications, London

Department of Environmental Affairs and Tourism (DEAT), (2006), *Strategic Environmental Assessment Guidelines*, First Draft for Comment, Department of Environmental Affairs and Tourism (DEAT), Pretoria

Department of Environmental Affairs and Tourism (DEAT), (2004a), *Overview of Integrated Environmental Management*, Integrated Environmental Management, Information Series 0, Department of Environmental Affairs and Tourism (DEAT), Pretoria

Department of Environmental Affairs and Tourism (DEAT), (2004b), *Strategic Environmental Assessment*, Integrated Environmental Management, Information Series 10, Department of Environmental Affairs and Tourism (DEAT), Pretoria

Department of Environmental Affairs and Tourism (DEAT), (2004c), *Environmental Management Plans*, Integrated Environmental Management, Information Series 12, Department of Environmental Affairs and Tourism (DEAT), Pretoria

Department of Environmental Affairs and Tourism (DEAT), (2002), *Stakeholder Engagement*, Integrated Environmental Management, Information Series 3, Department of Environmental Affairs and Tourism (DEAT), Pretoria

Department of Provincial and Local Government (DPLG), (2004), *The National Capacity Building Framework for Local Government*, Policy Document produced by the Department of Provincial and Local Government, Pretoria

Dey I. (1993), *Qualitative Data Analysis: A User Friendly Guide for Social Scientists*, Routledge, London

Dryzek J.S., Downes D., Schlosberg D., Hans-Kristian H. and Christian H. (2003), *Green States and Social Movements: Environmentalism in the United States, United Kingdom, Germany and Norway*, Oxford University Press, London

Dryzek J.S. (1997), *The Politics of the Earth: Environmental Discourses*, Oxford University Press, New York

Evers H.D. and Menkhoff T. (2004), Expert Knowledge and the Role of Consultants in an Emerging Knowledge-Based Economy, in *Human Systems Management*, (23), pgs. 123-135

Fairclough N. (2003), *Analysing Discourse: Textual Analysis for Social Research*, Routledge, London

Fischer T.B. (2003), Strategic Environmental Assessment in Post-Modern Times, in *Environmental Impact Assessment Review*, (23), pgs. 155-170

Fisher F. (1993), Policy Discourse and the Politics of Washington Think Tanks, in Fisher F. and Forester J. (Eds.), *The Argumentative Turn in Policy Analysis and Planning*, UCL Press, London

Fisher F. and Forester J. (1993), Introduction, in Fisher F. and Forester J. (Eds.), *The Argumentative Turn in Policy Analysis and Planning*, UCL Press, London

Forester J. (1993), Learning from Practice Stories: The Priority of Practical Judgement, in Fisher F. and Forester J. (Eds.), *The Argumentative Turn in Policy Analysis and Planning*, UCL Press, London

Gable G.C. (1996), A Multi-Dimensional Model of Client Success when Engaging External Consultants, *Management Science*, (42:8), pgs. 1175-1198

Hajer M.A. (2006), The Living Institutions of the EU: Analysing Governance as Performance, in *Perspectives on European Politics and Society*, (7: 1), pgs. 41-55

Hajer M.A. (2005a), Three Dimensions of Deliberative Policy Analysis: Analysing Governance Networks in Rebuilding Ground Zero, in *Planning Theory & Practice*, (6: 4), pgs. 445-464

Hajer M.A. (2005b), Coalitions, Practices, and Meaning in Environmental Politics: From Acid Rain to BSE, in Howarth D. and Torfing J. (Eds.), *Discourse Theory in European Politics: Identity, Policy and Governance*, Palgrave Macmillan Ltd., Great Britain

Hajer M.A. (2005c), Setting the Stage: A Dramaturgy of Policy Deliberation, in *Administration and Society*, (36: 6), pgs. 627-647

Hajer M.A. (2005d), A Decade of Discourse Analysis of Environmental Politics: Achievements, Challenges and Perspectives, in *Journal of Environmental Policy & Planning*, (7: 3), pgs. 175-184

Hajer M.A. (2003a), A Frame in the Fields: Policy-making and the Reinvention of Politics, in Hajer M. and Wagenaar H. (Eds.), *Deliberative Policy Analysis: Understanding Governance in a Network Society*, Cambridge University Press, Cambridge

Hajer M.A. (2003b), Policy Without Polity? Policy Analysis and the Institutional Void, in *Policy Sciences*, (36), pgs. 175-195

Hajer M.A. and Wagenaar H. (2003), Introduction, in Hajer M. and Wagenaar H. (Eds.), *Deliberative Policy Analysis: Understanding Governance in a Network Society*, Cambridge University Press, Cambridge

Hajer M.A. (1995), *The Politics of Environmental Discourse: Ecological Modernisation and the Policy Process*, Oxford University Press, Oxford

Haque M.S. (1999), The Fate of Sustainable Development Under Neo-liberal Regimes in Developing Countries, in *International Political Science Review*, (20: 2), pgs. 197-218

Hallowes D. and Butler M. (2002), Power, Poverty and Marginalized Environments: A Conceptual Framework, in McDonald M.A. (Ed.), *Environmental Justice in South Africa*, University of Cape Town Press, Cape Town

Hastings A. (1999), Discourse and Urban Change: Introduction to Special Issue, in *Urban Studies*, (36: 1), pgs. 7-12

Hattingh J., Kgomongoe M., Leaner J., Maree G., Turton A., Strydom W. and van Wyk E. (2003), *Obstacles to Successful Implementation of Governance Tools*, Paper Presented at IAIAsa Conference, Protea Hotel Wilderness Resort, Wilderness, Western Cape

Hattingh J. and Seeliger L. (2003), *Meeting Ethical Challenges in Environmental Decision-Making: Perspectives From the Ethics Survey in Cape Town and Surrounds*, Paper Presented at IAIAsa Conference, Protea Hotel Wilderness Resort, Wilderness, Western Cape

Hayek F.A. (1945), The Use of Knowledge in Society, in *The American Economic Review*, (35: 4), pgs. 519-530

Healey P., de Magalhaes C., Madanipour A. and Pendlebury J. (2003), Place, Identity, and Local Politics: Analysing Initiatives in Deliberative Governance, in Hajer M. and Wagenaar H. (Eds.), *Deliberative Policy Analysis: Understanding Governance in a Network Society*, Cambridge University Press, Cambridge

Healey P. (1993), Planning Through Debate: The Communicative Turn in Planning Theory, in Fisher F. and Forester J. (Eds.), *The Argumentative Turn in Policy Analysis and Planning*, UCL Press, London

Hertz R. and Imber J.B. (1995), Introduction, in Hertz R. and Imber J.B. (Eds.), *Studying Elites Using Qualitative Methods*, Sage Publications, London

Hills P. (2005), Environmental Reform, Ecological Modernisation and the Policy Process in Hong Kong: An Exploratory Study of Stakeholder Perspectives, in *Journal of Environmental Planning & Management*, (48: 2), pgs. 209-240

Hirsch P.M. (1995), Tales from the Field: Learning From Researchers' Accounts, in Hertz R. and Imber J.B. (Eds.), *Studying Elites Using Qualitative Methods*, Sage Publications, London

Hunter A. (1995), Local Knowledge and Local Power, in Hertz R. and Imber J.B. (Eds.), *Studying Elites Using Qualitative Methods*, Sage Publications, London

Karkkainen B.C. (2004), Post-Sovereign Environmental Governance, in *Global Environmental Politics*, (4: 1), pgs. 72-96

Keeley J. and Scoones I. (2000), Knowledge, Power, and Politics: The Environmental Policy Making Process in Ethiopia, in *The Journal of Modern African Studies*, (38: 1), pgs. 89-120

Kgomongoe M., Hattingh H. and Maree G. (2004), *Understanding the Relationship Between Government and Governance for Effective Implementation of Government Tools*, Paper Presented at IAIAsa Conference, Champagne Sports Resort, KwaZulu-Natal

Khan F. (2002), The Roots of Environmental Racism and the Rise of Environmental Justice in the 1990s, in McDonald M.A. (Ed.), *Environmental Justice in South Africa*, University of Cape Town Press, Cape Town

Kitchin R. and Tate N.J. (2000), *Conducting Research in Human Geography: Theory, Methodology and Practice*, Pearson Education, London

Kotźe L.J. (2005), *Improving Unsustainable Environmental Governance in South Africa: The Case of Holistic Governance*, Paper Presented at IAIAsa Conference, Thaba 'Nchu Sun, Free State

KwaDukuza Local Municipality (2007), *KwaDukuza Municipality Strategic Environmental Assessment: Status Quo Report*, Prepared by SiVEST Selatile Moloi Team for the KwaDukuza Local Municipality, Stanger

KwaDukuza Local Municipality (2006), *KwaDukuza IDP Review (2006 / 2007)*, KwaDukuza Local Municipality, Stanger

Lafferty W.M. (1999), Introduction: The Pursuit of Sustainable Development: Concepts, Policies and Arenas, in *International Political Science Review*, (20: 2), pgs. 123-128

Laws D. and Rein M. (2003), Reframing Practice, in Hajer M. and Wagenaar H. (Eds.), *Deliberative Policy Analysis: Understanding Governance in a Network Society*, Cambridge University Press, Cambridge

Lees L. (2004), Urban Geography: Discourse Analysis and Urban Research, in *Progress in Human Geography*, (28: 1), pgs. 101-107

Lemon A. (2002), The Role of Local Government, in Parnell S., Pieterse E., Swilling M. and Wooldridge D. (Eds.), *Democratising Local Government: The South African Experiment*, University of Cape Town Press, Cape Town

Liang T.Y. (2004), Intelligence Strategy: The Evolutionary and Co-evolutionary Dynamics of Intelligent Human Organisations and their Interacting Agents, *Human Systems Management*, (23), pgs. 137-149

Low N. and Gleason B. (1998), *Justice, Society and Nature: An Exploration of Political Ecology*, Routledge, London and New York

Lubke V. (2004), *Environmental Discourse in the eThekwini Municipality: The eThekwini Catchments Project*, (Unpublished Thesis), University of KwaZulu-Natal, Durban

Macleod G. and Goodwin M. (1999), Space, Scale, and State Strategy: Rethinking Urban and Regional Governance, in *Progress in Human Geography*, (23: 4), pgs. 503-527

McDonald D.A. (2002), What is Environmental Justice?, in McDonald M.A. (Ed.), *Environmental Justice in South Africa*, University of Cape Town Press, Cape Town

Metcalfe M. and Ramlogan R. (2005), Limits to the Economy and Knowledge of the Economy, in *Futures*, (37), pgs. 655-674

Mottier V. (2005), The Interpretive Turn: History, Memory, and Storage in Qualitative Research, in *Forum: Qualitative Social Research*, (6: 2), Art. 33

North West Provincial Government (NWPG), (2004), *Strategic Environmental Assessment: Rustenburg*, Prepared by Eco Assessments: Ecological and Environmental Consultants for the North West Provincial Government, Mafikeng

Oelofse C., Scott D., Oelofse G., and Houghton J. (2006), Shifts Within Ecological Modernisation in South Africa: Deliberation, Innovation and Institutional Opportunities, in *Local Environment*, (11: 1), pgs. 61-78

Offe C. (1996), *Modernity and the State: East, West*, Blackwell Publishers Ltd, Oxford

Ostrander (1995), "Surely You're Not in This Just to Be Helpful" - Access, Rapport, and Interviews in Three Studies of Elites, in Hertz R. and Imber J.B. (Eds.), *Studying Elites Using Qualitative Methods*, Sage Publications, London

Partiff J. (2005), Questionnaire Design and Sampling, in Flowerdew R. and Martin D. (Eds.), *Methods in Human Geography*, Pearson Education Limited, England

Pearce D. (1993), *Blueprint 3: Measuring Sustainable Development*, Earthscan Publications Ltd., London

Peet R. (1998), *Modern Geographical Thought*, Blackwell Publishing Inc., Oxford

Perloff J.M. (2001), *Microeconomics*, (2nd Ed), Addison Wesley Longman (Inc.), United States of America

Pieterse E. (2002), Participatory Local Governance in the Making, in Parnell S., Pieterse E., Swilling M. and Wooldridge D. (Eds.), *Democratising Local Government: The South African Experiment*, University of Cape Town Press, Cape Town

Republic of South Africa (RSA), (2006), *Government Gazette No. 28753*, Government Notice No. R 385, R 386, and R 387, Government Printer, Pretoria, 21 April 2006

Republic of South Africa (RSA), (2001), *White Paper on Spatial Planning and Land-use Management*, Government Printer, Pretoria

Republic of South Africa (RSA), (2000), *Local Government: Municipal Systems Act*, Act No. 32 of 2000, Government Printer, Pretoria

Republic of South Africa (RSA), (1998a), *Local Government: Municipal Structures Act*, Act No. 117 of 1998, Government Printer, Pretoria

Republic of South Africa (RSA), (1998b), *National Environmental Management Act*, Act No. 107 of 1998, Government Printer, Pretoria

Republic of South Africa (RSA), (1998c), *Skills Development Act*, Act No. 97 of 1998, Government Printer, Pretoria

Republic of South Africa (RSA), (1998d), *The White Paper on Local Government*, Government Printer, Pretoria

Republic of South Africa (RSA), (1996), *Constitution of the Republic of South Africa*, Act No. 108 of 1996, Government Printer, Pretoria

Republic of South Africa (RSA), (1989), *The Environmental Conservation Act*, Act No. 73 of 1989, Government Printer, Pretoria

Retief F., Jones C., and Jay S. (2007a), The Status and Extent of Strategic Environmental Assessment (SEA) Practice in South Africa, 1996-2003, in *South African Geographical Journal*, (89: 1), pgs. 44-54

Retief F., Jones C., and Jay S. (2007b), The Emporer's New Clothes – Reflections on Strategic Environmental Assessment (SEA) Practice in South Africa, in *Environmental Impact Assessment Review*, (forthcoming)

Richardson D. (1997), The Politics of Sustainable Development, in Baker S. (Ed.), *The Politics of Sustainable Development: Theory, Policy and Practice within the European Union*, Routledge, London

Robinson G.M. (1998), *Methods and Techniques in Human Geography*, Wiley, Sussex

Rosenau J.N. (1997), *Along the Domestic Foreign Frontier: Exploring Governance in a Turbulent World*, Cambridge University Press, London

Rossouw N. and Wiseman K. (2004), *Learning from the Implementation of Environmental Public Policy Instruments After the First Ten Years of Democracy in South Africa*, Paper for IAIAsa Conference, Champagne Sports Resort, KwaZulu-Natal

Rustenburg Local Municipality (RLM), (2006), *Rustenburg Integrated Development Plan 2006 / 2007*, Rustenburg Local Municipality, Rustenburg

Rustenburg Local Municipality (RLM), (2005), *Rustenburg Local Municipality Strategic Environmental Assessment: Status Quo Final Report*, prepared by Ntumbuluko Environmental Services for the Rustenburg Local Municipality and the North West Department of Agriculture, Conservation, Environment and Tourism (NW DACET), Rustenburg

Rustenburg Local Municipality (RLM), (2004), *Rustenburg Spatial Development Framework*, Prepared by Urban Dynamics North West Inc. for the Rustenburg Local Municipality, Rustenburg

Rustenburg Local Municipality (RLM), (2003), *Rustenburg Strategic Environmental Assessment*, Prepared by Eco Assessments: Ecological and Environmental Consultants for the North West Department of Agriculture, Conservation, Environment (NWDACE), Department of Developmental Local Government & Housing (NW DDLG&H) and The Finnish Environment Institute, Rustenburg

Scott D. and Oelofse C. (2007), *The Staging of Public Participation in Environmental Policy Processes: The Point Small Craft Harbour in Durban, South* Africa, Paper presented at the International Policy Analysis Conference, Amsterdam

Short J.R. (1993), *An Introduction to Political Geography*, Routledge, London

Skelcher C., Mathur N. and Smith M. (2005), The Public Governance of Collaborative Spaces: Discourse, Design and Democracy, in *Public Administration*, (83: 3), pgs. 573-596

Skocpol T. (1979), *States and Social Movements: A Comparative Analysis of France, Russia, & China*, Cambridge University Press, London

South African Conservancies (SAC), (2001), *What is a Conservancy?*, South African Conservancies, accessed at www.karkloof.co.za/conservancy/definition.php4 on the 9 May 2008

Sowman M. (2002), Integrating Sustainability Issues into Local governmental Planning and Decision-Making Processes, in Parnell S., Pieterse E., Swilling M. and Wooldridge D., *Democratising Local Government: The South African Experiment*, University of Cape Town Press, Cape Town

Terre Blanche M. and Durrheim K. (1999), *Research in Practice: Applied Methods for the Social Sciences*, University of Cape Town Press, Cape Town

Thomas R.J. (1995), Interviewing Important People in Big Companies, in Hertz R. and Imber J.B. (Eds.), *Studying Elites Using Qualitative Methods*, Sage Publications, London

Tourism KwaZulu-Natal (2005), *Coastal Development or Coastal Destruction? The Transformation of the KwaZulu-Natal Coast*, Occasional Paper No. 38, Tourism KwaZulu-Natal

Valentine G. (2005), Tell Me About…: Using Interviews as a Research Methodology, in Flowerdew R. and Martin D. (Eds.), *Methods in Human Geography*, (2nd Ed.), Pearson Education, London

Van Dijk T.A. (1997), *Discourse as Structure and Process*, Sage Publications, London

Van Niekerk M.A. (2008), Map Produced by Author at the University of KwaZulu-Natal, School of Environmental Sciences, using Data Sourced from the Chief Directorate, Maps and Surveying, Durban

Van Schalkwyk M. (2006), *Environmental Protection: Quicker, Simpler, Better New EIA Regulations for South Africa*, Speech presented at launch of new EIA regulations, Pretoria, 19th April 2006

Vigar G. and Healey P. (2002), Developing Environmentally Respectful Policy Programmes: Five Key Principles, in *Journal of Environmental Planning & Management*, (45: 4), pgs. 517-532

Visser G. (2001), On the Politics of Time and Place in a Transforming South African Research Environment: New Challenges for Research Students, in *South African Geographical Journal*, (83: 3), pgs. 233–239

Wagenaar H. and Cook S.D. (2003), Understanding Policy Practices: Action, Dialectic and Deliberation in Policy Analysis, in Hajer M. and Wagenaar H. (Eds.), *Deliberative Policy Analysis: Understanding Governance in a Network Society*, Cambridge University Press, Cambridge

Wallington T., Bina O., and Thiseen W. (2007), Theorising Strategic Environmental Assessment: Fresh Perspectives and Future Challenges, in *Environmental Impact Assessment Review*, (27), pgs. 569-584

Walmsley B. (2005), The Value of Sub-Regional Expert Nodes in Assisting Governments and Regional Economic Communities: Could This Be a Model?, Paper for IAIAsa Conference, Thaba'Nchu Sun Hotel, Thaba'Nchu, Free State Province

WCED (World Commission on Environment and Development) (1987), *Our Common Future*, Oxford University Press, Oxford and New York

Appendix A: Questionnaires used for Public Officials, Environmental Consultants, and Key Stakeholders

Introduction: Project Description

Good Day! My name is Michael van Niekerk and I am a student currently undertaking my Masters degree in Environmental Management at the University of KwaZulu-Natal.

The topic of my Masters is the role of environmental consultants in the environmental decision-making processes. In general terms, this thesis will be looking at environmental decision-making within local municipalities. The study will be focusing on two 'regional' SEAs; the KwaDukuza Municipality SEA and the Rustenburg Municipality SEA. The aim of the project is to determine the perspectives of the consultants and municipal staff in the project and to what extent consultants are involved in decision-making processes.

Thank you for agreeing to the interview. I would like to request that I be able to record the interview so that there is an accurate record of our discussion and so that the interview is not slowed down by me taking notes. You have the option of letting your name remain anonymous in the thesis when reporting on the information that you provide. I will however need to indicate whether you are a public official or a consultant. I would like to highlight that participation is voluntary and that you are free to withdraw from the research at any time. Any data that is collected will be secured and stored by myself and my supervisors. This information will not be shared with anyone else and is solely for the purposes of completing my Masters Dissertation, subsequent papers and oral presentations.

Questionnaire for Environmental Consultants

1. What are you're qualifications, years of experience in environmental management and area of interest?

2. What is your specific role within the project?

3. What were the key environmental issues or problems that were identified by the SEA?

4. Which key issues or problems did you feel were particularly important? And why?

5. What groups or coalitions formed during the SEA? Give examples

6. Were there any specific people or groups that dominated the identification and definition of key issues or problems?

7. What arguments did these people or groups use to gain support or to become so dominate?

8. Why was the SEA commissioned?

9. How did you become firm become involved in the project?

10. What plans or policies guided the SEA?

11. What is the ultimate goal or aim of the SEA?

12. What is the role of the public and consultants / public officials in this SEA?

13. What were the significant phases of the project?

14. Within which phases did debate or areas of conflict commonly arise? How were these disagreements resolved?

15. How were the Terms of Reference (TOR) defined and set? Did these change at any time and why?

16. How would you describe the relationship between yourself and the public officials in the steering committee meetings and public meetings? Does the relationship differ in the two settings?

17. Where did the steering committee meetings take place?

18. Where did the public meetings take place?

19. Who selected the venues and why were these venues chosen?

20. Who was responsible for setting the agenda for the steering committee meetings? In these meetings, did any people or groups attempt to manipulate or change the agenda?

21. Who was responsible for setting the agenda for the public meetings? In these meetings, did any people or groups attempt to manipulate or change the agenda?

22. In what way were the key issues or information presented to public?

23. In what way did the public present their key issues or information to you?

24. Do you think that the way in which the public and you presented the issues or information to other stakeholders was appropriate and effective?

25. In what ways, following these presentations, has your perspective about the key issues or problems changed? What is the reason for this change?

26. Please comment on the change in any of the relationships between stakeholders during the project?

27. How deliberative do you thing the SEA was? Do you think this could be improved and how?

28. How would you describe local governments approach to environmental decision-making? Is this changing and why?

29. To what extent does this approach allow local government to integrate environmental issues into development and planning more effectively?

30. How is the role of environmental consultants in environmental management changing? Is there a shift in local government away from in-house expertise to using consultants?

31. Why do you think local government has used environmental consultants for this SEA?

32. Do you think working with the municipality has influenced the way in which you think about environmental problems? Give examples?

33. Please comment on the problem of 'institutional lack of capacity' during the transformation of local government and how it has affected this municipality in terms of environmental management?

Questionnaire for Public Officials

1. What are you're qualifications, years of experience in environmental management and area of interest?

2. What is your specific role within the project?

3. What were the key environmental issues or problems that were identified by the SEA?

4. Which key issues or problems did you feel were particularly important? And why?

5. What groups or coalitions formed during the SEA? Give examples

6. Were there any specific people or groups that dominated the identification and definition of key issues or problems?

7. What arguments did these people or groups use to gain support or to become so dominate?

8. Why was the SEA commissioned?

9. How did you become firm become involved in the project?

10. What plans or policies guided the SEA?

11. What is the ultimate goal or aim of the SEA?

12. What is the role of the public and consultants / public officials in this SEA?

13. What were the significant phases of the project?

14. Within which phases did debate or areas of conflict commonly arise? How were these disagreements resolved?

15. How were the Terms of Reference (TOR) defined and set? Did these change at any time and why?

16. How would you describe the relationship between yourself and the consultants in the steering committee meetings and public meetings? Does the relationship differ in the two settings?

17. Where did the steering committee meetings take place?

18. Where did the public meetings take place?

19. Who selected the venues and why were these venues chosen?

20. Who was responsible for setting the agenda for the steering committee meetings? In these meetings, did any people or groups attempt to manipulate or change the agenda?

21. Who was responsible for setting the agenda for the public meetings? In these meetings, did any people or groups attempt to manipulate or change the agenda?

22. In what way were the key issues or information presented to public?

23. In what way did the public present their key issues or information to you?

24. Do you think that the way in which the public and you presented the issues or information to other stakeholders was appropriate and effective?

25. In what ways, following these presentations, has your perspective about the key issues or problems changed? What is the reason for this change?

26. Please comment on the change in any of the relationships between stakeholders during the project?

27. How deliberative do you thing the SEA was? Do you think this could be improved and how?

28. How do you feel about local government using environmental consultants? And on this project?

29. Why were environmental consultants used on this particular project?

34. How would you describe local governments approach to environmental decision-making? Is this changing from the approach used in past and why?

35. To what extent does this approach allow local government to integrate environmental issues into development and planning more effectively? How could this approach be improved?

30. Do you think that environmental consultants will be used more extensively in the future? And why?

31. Does this indicate that there is a shift within local government from in-house expertise to the use of consultants?

32. Do you think working with the consultants has influenced the way in which you think about environmental problems? Give examples?

33. Please comment on the problem of 'institutional lack of capacity' during the transformation of local government and how it has affected this municipality in terms of environmental management?

Questionnaire for Key Stakeholders

1. What are you're formal qualifications, years of experience in environmental management and area of interest?

2. What was your specific role within the project? Some of your duties?

3. What were some of the key environmental issues or problems the SEA identified?

4. Why was the SEA commissioned?

5. In one sentence, what do you think is the ultimate goal or aim of the SEA?

6. What was the role of the public on this project

7. What was the role of public officials on this project

8. What was the role of the consultants on this project

9. Why do you think local government has used environmental consultants for this SEA?

10. How do you feel about local government using environmental consultants in general? And on this project?

11. How would you describe your relationship with the consultants on this project?

12. How would you describe your relationship with the public officials on this project?

13. Do you think that municipal decision-making is becoming more participatory? Is this different from in the past? Why do you think that it is changing?

14. To what extent do the changes allow local government to integrate environmental issues into development and planning more effectively? How can this be improved?

15. How is the role of environmental consultants in environmental management changing? How do you think environmental consultants should be used?

Appendix B: The Rustenburg Priority Area 2 Terms of Reference

DRAFT
TERMS OF REFERENCE

For

STRATEGIC ENVIRONMENTAL ASSESSMENT: RUSTENBURG MUNICIPAL AREA, PHASE 2 & 3

1. INTRODUCTION AND BACKGROUND

The White Paper on Environmental Management Policy for South Africa (1998) defines an Strategic Environmental Assessment (SEA), as "a process to assess the environmental implications of a proposed strategic action or decision: a policy, plan, programme or piece of legislation". A key objective of SEA is to change the way in which decisions are made by integrating environmental values into the decision-making process. However, current SEA practices have shown that environmental assessment must go far beyond the analysis of the environmental consequences of decisions, i.e, it should influence the process and content of priorities, issues and values in decision-making.

To achieve the above, a holistic assessment is required in order to inform development planning of the balance between environmental sustainability, on the one hand, and development on the other. In order to achieve sustainable development, the opportunities offered and constraints imposed by the environment need to be assessed, hence the need for a Strategic Environmental Assessment (SEA), which should offer possible solutions for effective environmental management.

Key elements of an SEA process:

- Identify broad plan and programme alternatives
- Screening
- Scoping
- Situation assessment
- Formulate sustainability parameters for the plan/programme
- Develop and assess alternative plans and programmes
- Decision-making
- Develop plan for implementation, monitoring and auditing
- Implementation

The Rustenburg municipality, located in the Bojanala District Municipality of the North West Province of South Africa recently completed phase 1 of the Strategic Environmental Assessment (SEA). This was done in response to the recognition that the urban area is currently experiencing major growth, and is regarded as the second or third fastest growing city in Africa. Developments in the Rustenburg area include the Platinum Spatial Development Initiative (SDI), the Mozambique-Botswana corridor and the Bafokeng Platinum Initiative and numerous other mining operations and agriculture.

The consequent increasing pressure on natural and human resources is manifesting in acute problems such as growth in urban sprawl, uncoordinated and fragmented housing developments leading to sub-optimal infrastructure development, housing developments and industrial activities increasingly close to the sensitive area which may lead to a loss of biodiversity and heritage, air and water quality impacts in the region, and potentially incompatible competing land-uses

It is recognised that such high development pressures are or maybe threatening the sustainability and integrity of the environment and can lead to visible and invisible damage (or 'measurable and immeasurable impacts') if not addressed timeously in an integrated and strategic manner. The environment is regarded in the broad sense comprising the bio-physical social and cultural environment and economic environment.

2. OBJECTIVES

2.1 Reasons for this SEA

The reasons for conducting this SEA largely stem from the context provided in the introduction. Also, the SEA for phases 2 and 3 should complement the successful SEA for phase 1 and provide necessary environmental information for the entire area covered by the Rustenburg Municipal Spatial Development Framework.

Therefore, this SEA is needed to:

- Pro-actively inform development of plans and programmes;
- Identify opportunities and constraints, which the environment places on development;
- Provide information on sustainability for development currently taking place;
- Improve knowledge and understanding of cumulative environmental impacts of developments in the area, and
- Determine and maintain and/or enhance a level of environmental quality of the area.

2.2 Expected results

General outcomes:

- A vision and identification of significant strategic issues
- Situation assessment, including:
  - A detailed resource inventory
  - A detailed study of current land-uses and environmental impacts within the study area
  - Sustainability objectives, criteria and indicators
  - Environmental opportunities and constraints
- Formulation of sustainability parameters
- Broad plan and programme of alternatives in relation to development projects
- Alternatives including environmental substitutes and trade-offs
- A plan for implementation, monitoring and auditing

Specific outcomes:

The overall objective of the project is to develop an approach and framework for the Rustenburg area that ensures a sound integration of the environment into decision-making processes at the strategic level, i.e. in the formulation of policies, plans and programmes. The outputs of this SEA should include:

- A spatial framework for strategic development upon which local authorities can base their development policies, plans and programmes, including the opportunities and constraints that the environment places on development, and the no-go areas;
- A set of guidelines to assist the North West Dept. Agriculture Conservation Environment and Tourism (DACET) and the Rustenburg Municipality in making informed decisions when evaluating EIA applications in the Rustenburg Local Municipal area, and to ensure that development is within sustainable limits;
- To shorten the time period for environmental decision-making;
- Maps describing sensitive areas and also (if possible) how anticipated future investments will impact environmentally and socio-economically within the Rustenburg area. All maps shall be georeferenced in GIS compatible with the NW Provincial Information Service's systems;
- A Strategic Environmental Management Plan for the Priority Areas 2&3 for the Rustenburg area.

3. SCOPE OF THE SEA

This project focuses on priority areas 2 & 3 respectively (see below). Therefore it should be consistent with the approach used for priority area 1 which was the pilot assessment focusing on a part of the area of Rustenburg Local Municipality. These components of the SEA will result in the rest of the Municipal area now having being covered, subdivided into three priority areas i.e.

Priority area 1: The area to the north and east of the Magaliesberg. Northern and eastern boundary – the Pretoria Road (N4); southern and western boundary – the Magaliesberg Protected Natural Environment (MPNE) line. This was completed in June 2003.

Priority area 2: The area to the north of Priority area 1 including the remainder of the Rustenburg Municipal area to the north and east, also including the Olifantsnek Dam area (see map). The SEA for

this area shall be developed in close co-operation with the Bafokeng Platinum Initiative. This is the actual area to be covered by this study.

Priority area 3: The Municipal area to the south of the Magaliesberg Protected Natural Environment (MPNE) (see map). Although this area is not currently experiencing the same degree of environmental pressure as Priority areas 1 and 2, it needs to be included in the SEA of the entire Rustenburg Municipal Area.

4. ISSUES TO BE COVERED IN THE SEA

The SEA should be cover with in the situation assessment phase under the detailed resource inventory.

4.1 Environmental aspects to be included in the resources inventory

- Air quality parameters and monitoring with reference to the Rustenburg Air Quality Management Plans.
- A detailed geology and geotechnical survey of the area.
- Soil quality and identification of pollution sources.
- Quality and availability of water - including water pollution issues, extraction of sub-surface water (i.e. catchment assessment)
- Biodiversity and conservation status of fauna and flora. The Rustenburg Municipal area lacks an overarching approach to habitat management, e.g. a greenbelt and open spaces approach is required.
- Status and management of natural and cultural heritage resources.

4.2 Population trends of priority areas 1 & 2 for Rustenburg

- A baseline study of the socio-economic situation and demographics of the areas, including population and economic growth trends. This should include elements of literacy, income levels and disparities, longevity etc.

4.3 Human Health and Well-being

- A bulk services assessment to determine the demand and supply of potable water. Waste streams assessment (volume and types of waste produced) and management of waste. Establish whether waste management facilities are adequate for current and future demands.
- Potential impact of prevailing economic activities on human health and well-being of the resident population including the identification and extent of environmental health impacts.

4.4 Current land uses and major economic activities in these priority areas

- Human settlements – types, extent and distribution patterns and identification of major causal factors governing these
- Mining industry including the extent and types on mining and potential and actual impact of mining on other land uses and the environment
- Manufacturing, wholesale and retail sectors
- Farming, protection of agricultural land, sub-divisions of farming land, wild animals damaging crops and status of agrochemicals being used.
- Conservation including planned and existing formally and informally protected areas
- The extent and type of tourism activities in the area and potential economic spin-offs.
- Infrastructure – extent and type of road, rail and other transportation networks

4.5 Land use planning in priority areas 1 & 2 for Rustenburg

The status quo and future plans currently included in the municipal spatial framework, which has to be revised annually. The SEA outputs are to be incorporated into the spatial framework during these annual revisions. All development proposals contained in development plans with special reference to the Spatial Development Framework (SDF) compiled as part of the IDP Process should be reflected in and considered by the SEA. This SEA should also address land availability for settlement and development.

4.6 Governance issues

- Existing institutional structures which influence the maintenance and enhancement of environmental resources, e.g. law enforcement, co-operation between DACET and local

authority on EIA applications, co-operation between local authority and banks on approval of funding, etc.

- Promotion good governance and co-operative governance between all relevant departments, corporate social and environmental responsibilities practices of industries in the region (triple bottom line approach)

4.7 Any further issues to be identified by the consultant.

5. PLAN OF WORK AND METHODOLOGY

The SEA shall be conducted according to the Guideline document for SEA in South Africa (DEAT, 2000) and the Strategic Environmental Assessment (SEA) Resource Document, Version 1 (CSIR Environmentek, 2002) adapted for the specific context.

The mode of work will be a combination of desk studies and fieldwork. The consultant shall start by consulting and assessing all existing data and information related to the SEA process and the identified priority areas (see 5.1 below). S/he shall assess the availability, formats, reliability and correctness of the information and identify gaps in the data.

5.1 Published information (Secondary data)

- Strategic Environmental Assessment Report for Rustenburg Area phase 1, 2003
- Rustenburg Integrated Development Plan (IDP) and Spatial Development Framework (SDF)
- North West Provincial Spatial Development Framework & Zoning Plan
- North West State of Environment Report 2002
- Provincial Biodiversity Site Inventory & Database
- Municipal departments including Town Planning, City Engineer, Parks and Recreation
- Provincial government departments: NW DACET (various divisions) NW Dept of Developmental Local Government & Housing (NW DDLGH),
- National government departments: Water Affairs and Forestry (including Catchment Management Agencies), Agriculture, Environmental Affairs and Tourism, Trade and Industry (SDI) information
- North West Parks & Tourism Board
- S A Heritage Resources Agency (SAHRA)

- Royal Bafokeng Authority (RBA)
- Agricultural Research Council
- NGO's - contact via NW Ecoforum, the Magaliesberg Protection Association, the Habitat Council and the Mountain Club of South Africa
- University of the North West
- Consultants and town planners - e.g. Bafokeng Platinum Initiative Consultants
- Literature and internet
- Development Bank of South Africa
- Interested and Affected Parties
- Mining and industry
- Any other bodies

It is anticipated that the bulk of the resource inventory can be completed by compilation and integration of existing data from the sources listed above.

5.2 Field surveys (Primary data)

These should be limited to point checks to confirm trends from compilation of existing data. However, they should be focused on areas not already demarcated as no-go area. However, the buffer zone might require point checks, as might residential areas in the vicinity of mining operations.
The field surveys must include, but are not restricted to, biodiversity and habitats, heritage resources, uncontrolled development and availability of services.

5.3 Sustainability parameters

Sustainability parameters for the areas must be formulated. The environmental indicators which have been developed as part of the State of the Environment Report (SoER) process at national and provincial level can be used as guidelines. These are to be used as a point of departure for the SEA, and adapted and refined as required.

5.4 Stakeholder involvement

This is a core concept of the SEA process. It is envisaged that extensive public participation and consultation should take place with a wide representation of the local population and interest groups including government departments and NGOs and CBOs in the area.

The Consultant must have own transport and all needed hardware and software.

Please note: A Plan of Study for SEA is to be submitted with the tender document.

6. REQUIRED EXPERTISE

It will be expected that the SEA project team will comprise and/or have access to the following areas of expertise:

- Project management
- SEA experience including strategic thinking and integrative skills
- GIS skills and facilities
- Spatial analytical skills
- Town and Regional planning
- Local and indigenous knowledge of the area
- State of the Environment Reporting
- Environment Impact Assessment
- Integrated environmental management tools
- Environmental policy and legislation

7. PROJECT MANAGEMENT STRUCTURE

The SEA project team will report to a steering committee comprising of representatives of:

- Rustenburg Local Municipality
- DACET
- DDLGH
- DWAF
- North West Parks& Tourism Board

- Mining Industry
- Royal Bafokeng Authority
- Farmers Unions
- Community/NGOs,CBOs

This committee will have the power to monitor and evaluate the work as required.
This committee will have the power to co-opt as required.

8. TIMEFRAMES

The time frame envisaged for this work is eight months commencing from the signing of a contract. The principal target dates are as follows:

Invitation to tender	: 15 October 2004
Submission of tenders	: 31 October 2004
Contract signed	: 10 November 2004
Phase 1: Baseline Data Report	: 31 January 2005
Phase 2: Preliminary draft Strategic Guidelines for Priority Area 1	: 31 March 2005
Phase 3: Complete 1st draft SEA for Priority Areas 2& 3	: 30 April 2005
Review and acceptance	: 30 May 2005
Completion of project	: 30 June 2005

Appropriate dates for ongoing report backs by and discussion with the consultants will be negotiated by the Steering Committee. However, it is expected that the consultant shall prepare the following reports:

- Within one month of signature of the contract an inception report containing a detailed work-plan including report, database and map formats, databases and literature to be consulted, institutions to be contacted, time-schedules and expert inputs;
- Within four months of signature of the contract, submit an interim report;
- Within five months of signature of the contract a workshop to present the results so far and gather comments;
- Within six months of signature of the contract a Draft Final Report including all maps and data as well as conclusions and recommendations; and
- A Final Report within two weeks after receiving comments on the Draft Final Report.

All reports (inception, interim draft final and final), data and maps should be delivered both in 10 copies on CDs and in 10 copies in paper format (hard copy) and in full colour. The reporting language is English. The final document, including the databases and information gathered during the process, remains the property of the people of province to be lodged with NWDACET and the Rustenburg Municipality respectively.

Since this is a project within the broad framework of Integrated Environmental Management development in the NW Province, the final SEA and the process leading to it, will be subject to an external review process.

9. BUDGET

Whilst the scope of this work seems vast, it is the implementation of this project that requires tight project management, attention to relevant stakeholder participation and the focused use of expertise.

10. TENDER ADJUDICATION

Proposals received will be adjudicated according to the following criteria:

- Relevant previous experience of the team members;
- Technical expertise specific to the terms of reference;
- Clarity of planned actions, milestones, outputs, timing and corresponding budget;
- Incorporation of all elements of the scope of work;
- Knowledge of the relevant environmental legislation and understanding of the project requirements;
- Detailed methodology;
- Detailed explanation of products that will be developed (outcomes of the work);
- Diversity in the project team;
- Timeliness; and
- Price quoted (VAT included), number of hours and hourly rate to be explicit, and disbursements.

The tender evaluation criteria and procedures are explained in detail in the Instructions for Tenderers.

11. ADDITIONAL INFORMATION

11.1 Mandate

During the study, the expert team is entitled and expected to discuss with the pertinent persons and organizations any matters related to the assignment. The team is authorized to make any commitments or statements on behalf of the client. The final draft reports prepared by the expert team shall be subject to approval by the relevant competent authorities in the North West province.

12. CONTACT DETAILS

All correspondence must be forwarded to:

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