

**SCOTTISH ENVIRONMENTAL PROTECTION AGENCY:
MAKING SENSE OF A FRAGMENTING ENVIRONMENT**

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INTRODUCTION

In 1991, the Secretary of State for Scotland announced the Government's intention to create a new body to be responsible for the protection and management of the Scottish environment. The Scottish Environmental Protection Agency was intended to streamline and strengthen the then existing administrative and organisational arrangements for environmental protection in Scotland. These arrangements were characterised by considerable fragmentation of function and responsibility at central, regional and local levels of public administration. A particular concern was the overlap between the regulation and production of waste by the (then) district and Island authorities (Scottish Office 1992). This was held to give rise to questions of conflict with attendant issues of inefficiency, inequity and unaccountability. The Environment Act 1995 provided the legislative basis for the setting up of the Scottish Environmental Protection Agency, which subsequently came into effect in April 1996 as a 'non departmental public body' responsible for the protection and management of the Scottish environment. The creation of the Scottish Environmental Protection Agency with its associated rationalisation of environmental powers and responsibilities and organisations did not take place in isolation

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from other institutional changes in Scotland. A number of other agencies - Scottish Enterprise, Highlands and Islands Enterprise, Scottish Homes and Scottish Natural Heritage - underwent a similar process of administrative restructuring. Broadly speaking, the rationale for the changes was based on the perceived efficiency gains to be realised in public policy formulation and implementation through the rationalisation of administrative arrangements, removal of institutional overlap, duplication, associated waste and attendant inefficiencies. The broad programme of institutional restructuring formed part of the hollowing out of the public sector which was driven by powerful neo-liberal market economic and political ideas (Rhodes 1996). Local government reorganisation also became effective in 1996 as part of this process. The established two tier structure of regional and district authorities was replaced with a streamlined, single tier market-oriented enabling system of local government. Administrative changes were made including those associated with the protection and management of the environment.

These processes of change form the immediate context to the establishment of the Scottish Environmental Protection Agency (SEPA) and raise questions about the effectiveness, equity and accountability of this particular approach to environmental protection and management in Scotland. This article considers the origins, remit and powers together with the implications of the Scottish Environmental Protection Agency in sustaining an appropriate regulatory framework for the Scottish environment.

THE CONTEMPORARY ENVIRONMENTAL AGENDA

There can be little doubt that a concern about the conditions, development and management of the natural environment is a high and pressing policy priority on contemporary global, national and local political agendas. It has been argued, for example, that societies' relationship with the natural

environment is more critical now than at any other time in the past; thus it is 'conceivable that we have reached a defining moment in the relationship between the environment and society whereby changes in economic, political and cultural dimensions are occurring both in response to environmental change and in order to prevent changes that may threaten survival' (Blowers 1997, p.153). A far from exhaustive catalogue of concerns would include the nature and impacts arising from the over-exploitation of natural resources and non-renewable ecological assets; the environmental impact, ecological disruption and visual intrusion associated with industrial, commercial and residential development; the ability of communities to execute the principles associated with sustainable development which attempting to integrate more explicitly social, community and environmental issues to questions of economic growth and development (and combatting the effects of economic decline); and, the consequences of enhancing a more integrated awareness of the environmental aspects of public policy and private action. The (incomplete) catalogue of contemporary ecological risks are held to be distinctively different from those which have prevailed before, reflecting their anthropogenic origin, global impacts, socially uneven responses, entrenched conflicts between interests and a powerful ethical dimension (Blowers 1997).

Traditionally, environmental problems and conflicts in the UK have been addressed by common law arrangements which in practice have proved to be of relatively limited use given the associated costs involved and the over-riding predominance of individual property rights and interests (Dingle 1982). As a consequence, formal governmental intervention through regulation has emerged over time as the preferred method of addressing environmental problems in an industrial society. In practice, regulatory regimes have developed in a relatively piecemeal way, resulting in a complex system of government

rules and regulations, public sector bodies, land use planning, building and development control codes and enforcement mechanisms operating within a paradigm of private property rights (Reid 1998). Recently, however, there has been increasing interest in the deployment of market or pricing incentives by government to secure environmental control and management. This line of argument has been fostered through fiscal incentives (taxation and subsidies) to modify consumption and production behaviour in the economy in order to more fully reflect the value of environmental resources. The interest in market based instruments and incentives reflects the broad assertion of neo-liberal economic ideas which have impacted across a broad spectrum of public policy activities.

Notwithstanding the interest in market-led incentives for environmental management, regulation remains the cornerstone of pollution control. It has been argued that despite 'the current vogue for suggesting economic or fiscal mechanisms for combating environmental problems, the system of regulation by public bodies remains the prime tool for environmental protection in this country' (Ball and Bell 1991, p.61). This balance of policy instrument is confirmed by the Scottish Office (1992): regulation would continue to be the foundation of pollution control in Scotland as evidenced by the Environmental Protection Act 1990. The legislation established the basis of an integrated pollution control framework which is intended to bring together the disparate responsibilities for environmental management and pollution control (Fry 1997).

Driving the contemporary environmental agenda and defining the broad relations between state and market, regulation and pricing, is an intellectual and practical interest in the context of sustainable development. Sustainable development has been defined in terms of a process which seeks to reconcile the interests of economic development and the environment in a manner that meets the needs of the present generation, without

compromising the ability of future generations to meet their own needs. In light of contemporary economic and social pressures, the issue of inter-generational equity poses an elusive and major challenge to policy makers. The environmental ideology of sustainable development has been articulated in the World Conservation Strategy and the United Nations Conference on Environment and Development. These advocate an environmental policy framework based on the principles of sustainable development through regulation and standard setting and a reliance on market signals to influence the behaviour of producers and consumers. In practice, sustainable development effectively means emphasising the husbandry of available resources and introducing a more appropriate value system into decision making processes. It has been argued that sustainable development implies 'a wholesale shift from exploitation to conservation; a redistribution of resources from rich to poor; and a withdrawal now from those activities which rob or imperil future generations' (Blowers 1992, p.133). Whether policy action to date has achieved (or indeed can ever achieve) these ambitious aims is questionable in light of the underlying private property framework and public policy discourse.

ORIGINS OF THE SCOTTISH ENVIRONMENTAL PROTECTION AGENCY

The Scottish Environmental Protection Agency was intended to reflect the distinctive nature of established Scottish legal and administrative arrangements whilst meeting new environmental challenges. In introducing the proposed body, the Scottish Office stated that SEPA would assume responsibility for controlling defined forms of pollution in Scotland, including integrated pollution control, air quality and radioactive waste, the prevention and control of water pollution and the regulation of solid waste disposal. To this end, the Scottish Office stressed that SEPA 'will bring together the present regulatory bodies

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under an integrated structure ... [and] ... will take a strategic and pro-active approach to preventing and curbing pollution of the environment' (Scottish Office 1991). In particular, SEPA was to streamline and strengthen the then existing administrative and organisational arrangements for environmental protection in Scotland which were characterised by considerable fragmentation of function and responsibility at central, regional and local levels of government. These arrangements for pollution control in Scotland exhibited considerable vertical and horizontal fragmentation of administrative responsibility and organisation. These included the Scottish Office which had (and, as the Scottish Executive, retains) overall responsibility for environmental protection through promoting legislation and the publication of Circulars, National Planning Policy Guidelines and Planning Advice Notes to establish the framework for environmental policy; Her Majesty's Industrial Pollution Inspectorate (HMIPI); the Health and Safety Executive; Scottish Natural Heritage; River Purification Authorities and local authorities which were responsible for waste disposal, local air pollution control and land use planning. The piecemeal nature of these arrangements together with their potential for duplication, waste and inefficiency had drawn critical attention from the Scottish Office (Lloyd and Ross 1995). The emphasis and guiding principle of SEPA was that of integration of regulations and provisions for environmental protection and the prevention of pollution.

In January 1992, the Secretary of State for Scotland published a Consultation Paper, 'Improving Scotland's Environment - The Way Forward', which set out in detail the nature of SEPA and the proposed rationalisation of the existing responsibilities for pollution control in Scotland (Scottish Office 1992). The Consultation Paper rehearsed the government's case for institutional changes for pollution control. In general, the government considered that the fragmented nature of the

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existing arrangements was problematic and lacked the benefit of a holistic perspective on environmental change. It was argued that 'the present, fragmented arrangements, however effective in their own field of responsibility, lack the benefit of an overall view and may risk some gaps or overlaps occurring' (Scottish Office 1992, p.4). In particular, it was argued that there was a need to remove any overlap and potential conflict between existing organisations and agencies involved in the process of pollution control.

The Scottish Office stated that SEPA would be a single, independent agency with executive powers. It would assume the pollution control responsibilities of three sets of existing bodies: the river purification boards, the district and island councils and HM Industrial Pollution Inspectorate. As a consequence, SEPA would apply and enforce pollution control standards by granting authorizations, licences and consents for emissions, discharges and disposals to the environment. The Scottish Office (1992, p.4) stated that 'at present, because each regulatory agency is concerned with waste discharges to a single environmental medium, there is a risk that decisions on authorizations may be taken in isolation. In large measure this risk can be overcome by liaison between the agencies. But such difficulties can be more readily overcome if a single body is responsible for all the necessary authorizations at a particular plant'. It follows then that a principal advantage of the administrative reorganisation into a single body will be to provide an integrated framework of control of the environment. This would bring together into one administration the responsibilities for pollution control through the principal environmental media. It must follow that SEPA would then facilitate a more efficient administration of the regulations, procedures and interests involved in environmental protection and pollution control. The Consultation Paper proposed that SEPA would build on the established organisational boundaries and administrative structures of the

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River Purification Boards. The Secretary of State for Scotland would set the standards for pollution control which SEPA would then seek to enforce.

There followed a consultation period during which representations could be made to the Scottish Office. In February 1993, the Secretary of State for Scotland announced that the government intended to proceed with the proposed SEPA. In response to the representations, however, a number of relatively minor amendments were accepted by the Scottish Office including the provision for greater local involvement in the various structures and procedures of SEPA.

SCOPE AND FUNCTION OF ENVIRONMENTAL PROTECTION

Under Section 31 of the Environment Act 1995, the Secretary of State for Scotland has a responsibility to issue guidance to SEPA on its aims and objectives. When issued, the strategic guidance directed that SEPA's principal aim is 'to deliver well-managed integrated environmental protection, not only as an end in itself but as a contribution to the Government's goal of sustainable development' (Scottish Office 1995). The objectives of SEPA were set out as adopting an integrated approach to environmental protection and enhancement; working with all relevant sectors of society to develop approaches which deliver environmental requirements and goals without excess costs; adopting clear and effective procedures for servicing its customers; operating to high professional standards; organising its activities in ways which reflect good environmental and management practice and providing value for money; providing clear and readily available advice and information on its work; and, developing a clear and responsive relationship with the public, local authorities, local communities and regulated organisations.

The guidance published by the Secretary of State for Scotland stated that SEPA should 'seek to integrate environmental

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requirements with the need for economic and social development to allow improvements in the overall quality of life' (Scottish Office 1995, p.4). Here, SEPA has an important role within the context of the Government's broader agenda for the implementation of the principles of sustainable development. To this end, the Secretary of State sets out specific guidance on the appropriate behaviour of SEPA. The integrated body is expected to take a holistic approach to the protection and enhancement of the environment with particular attention to associated longer term implications and effects of environmental change. SEPA is to give specific weight to the statutory requirements for conservation of the natural heritage and biodiversity. SEPA is to discharge its statutory functions and responsibilities in partnership so as to maximise the scope for cost effective investment by regulated organisations in improved technology and management techniques. SEPA is expected to forge close working relationships and partnerships also with the public and local authorities. The strategic guidance stress that SEPA should discharge its functions, wherever possible, in partnership with business, the public, local authorities and other representatives of local communities and other bodies with sustainable development functions. This mirrors other initiatives put in place by the Scottish Office such as the recent policies for rural areas which seek to set out a framework for the integration of policies and planning priorities for rural Scotland (Scottish Office 1992, 1995). These stress a thematic approach to management of rural change with reference to the principles of sustainable development. This approach is viewed in terms of the partnership idea reflected explicitly in the White Paper for Rural Scotland.

The principal functions of SEPA are inherited from its predecessor bodies. These are the consenting of discharges to the water environment (surface, tidal and ground); conserving water resources as far as practicable; providing flood warning

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systems; granting abstraction licences for irrigation where a control order is in force; issuing authorizations to prevent, minimise or render harmless the release of substances into the environment from prescribed processes; authorization of handling and disposal of radioactive materials; registration of persons holding or using radioactive materials; licensing of waste management activities; registration of waste carriers and brokers; regulation of trans-frontier shipment of waste; monitoring of pollution; and, enforcement action against persons breaching licence conditions or illegally polluting the environment. SEPA's scientific work includes regulation of the environment, impact assessment and forecasting. Monitoring is undertaken of discharges to the aquatic environment, emission to the air, waste disposal and radioactive discharges. Regulation involves confirming self monitoring by industry and assessing compliance with licences. Impact assessment seeks to monitor the atmospheric, aquatic and terrestrial environments. Forecasting involves assessment of potential pollutants on sensitive ecological environments.

The enabling legislation goes further, however, in setting out new duties and powers for SEPA. These include

- a duty to prepare a national waste strategy
- a duty to advise on whether contaminated land should be designated as a 'special site' and also to act as enforcing authority for such sites
- a duty to regulate the 'producer responsibility' proposals
- a function to assess, as far as appropriate, risk of flooding on any area
- a duty to advise planning authorities on flood risk
- status as statutory consultee on new land drainage works
- a duty to promote the conservation and enhancement of the natural beauty and amenity of controlled waters
- a duty to have regard both to the desirability of conserving and enhancing the natural and man-made environment and to the social and economic needs of any area

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- a duty to keep up-to-date on pollution control technology and powers to undertake relevant research and development
- powers to carry out assessments of the general state of the environment
- duty to take into account the likely costs and benefits of exercising its powers
- reserve powers, with Secretary of State approval, to direct local authorities to achieve air quality standards
- powers to require creation of smoke control areas

The SEPA Board is appointed by the Secretary of State for Scotland and comprises a Chair, deputy Chair and ten members, including the Chief Executive. The Board appoints from its members the Chairs of the three Regional Boards and an Audit Committee which ensures the effectiveness of SEPA's financial control systems. The SEPA Board has specific responsibility for establishing the overall strategic direction of SEPA; ensuring high standards of corporate governance; overseeing the delivery of planned results and ensuring that SEPA operates sound environmental policies in relation to its own operations. The three regional boards have general responsibilities include the development of business plans for the region, the generation and implementation of local initiatives for the environment and advising on applications which have significance for the environment. There are five Directorates: North Region, East Region, West Region, Environmental Strategy and Corporate Services (see figure 1). Some 90% of staff are employed within the three regions, providing the main operational function of pollution prevention, control and scientific support. SEPA is required to take account of the distinct variations in Scotland's natural environment, society and economy in discharging its functions. Indeed, it is suggested that

national standards need to be tempered by sensitivity to local circumstances, except where significant global effects would suggest otherwise. High standards of environmental quality may be particularly

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important in Scottish rural areas - not only because the environment may be fragile but because the local economy may depend on the economic activity contingent upon a quality environment. On the other hand, unreasonably high standards would disadvantage other local businesses. (Scottish Office 1995, p.4)

In this context SEPA (1997) states that it is committed to conducting its business in an open and responsive style and to listen.

Figure 1
Organisational Structure of SEPA

West Region

Solway and Clyde River Purification Boards

Dumfries & Galloway; North, South and East Ayrshire; North & South Lanarkshire; Inverclyde; East Renfrewshire; City of Glasgow; East Dunbartonshire; Dunbarton, Clydebank; Argyll & Bute; and small parts of Borders and Stirling

East Region

Tweed, Forth and Tay River Purification Boards

Borders; East Lothian; West Lothian; Midlothian; City of Edinburgh; Falkirk; Fife; Clackmannan; Stirling; Perthshire & Kinross; Angus and a small part of Aberdeenshire

North Region

North East and Highland River Purification Boards, Western Isles, Orkney and Shetland

Aberdeenshire; Moray; Highland.; Western Isles; Orkney and Shetland

It is based at Stirling. It publishes a wide range of informative material. It is also in the process of intruding systems to monitor compliance and results will be reported. Public access to information is available from local offices as well as the three regional headquarters at Dingwall, East Kilbride and Riccarton. It has a budget of £26 million, 650 staff and 22 local offices throughout Scotland.

CHANGING INSTITUTIONAL RELATIONS?

Whilst SEPA has assumed responsibility for the key pollution control functions in Scotland it noticeably remains separate from the statutory land use planning system which (appropriately) will remain with local authorities. It is evident that land use planning as an established instrument has considerable potential for contributing to sustainable development of resources and more generally as a preventative tool for safeguarding the environment (Hebbert 1992). There is little yet to suggest a formal contribution by SEPA to the preparation of development plans and the function of development control. For instance, SEPA is heralded as the 'one stop' shop for environmental protection yet it has no role with respect to environmental impact assessment (EIA) which currently exists solely as a 'material consideration' to be taken into account by the planning authority when determining whether or not to grant planning permission for development proposals. As a result, in terms of preventative action, SEPA has no role at all and EIA remains as merely a tool used in planning instead of planning being one means of ensuring environmental protection. The transfer of pollution control responsibilities away from local government will result in a dilution of accountability over the environment. There are two dimensions to this argument. There is the concern that SEPA will remain aloof from local considerations. As responsibilities for pollution control are centralised away from local authorities, individuals in specific localities may have less opportunity to make representations on specific points of concern or environmental conflict. Indeed this point is acknowledged by the Scottish Office in its statement that it intends that SEPA's organisational structure will be responsive to local needs. This may be achieved through a system of regional advisory committees which would enable the transfer of local interests into the formal decision making processes of the organisation (Scottish Office 1992). This is to be welcomed

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but it does not address the question of accountability directly. SEPA is effectively a non-elected body and the erosion of local authority involvement in pollution control involves a reduction in the accountability that was intrinsic to such activities.

A related point concerns SEPA's relationship with other bodies concerned with the environment writ large which now co-exist alongside central government and local authorities but which are increasingly assuming greater importance in the formulation and execution of public policy. In general terms, SEPA may serve to confuse the investment and developmental interests involved in specific projects as to the demarcation between the individual agencies. Thus, to what extent is there horizontal integration between the agencies charged with development and those, such as SEPA, responsible for environmental protection and pollution control? More specifically, SEPA does not have the exclusive responsibility for environmental regulation and management in Scotland. The Natural Heritage (Scotland) Act 1991, for example, created Scottish Natural Heritage 'to secure the conservation and enhancement of, and to foster the understanding and enjoyment of, the natural heritage of Scotland'. Scottish Natural Heritage (SNH) was formed through the merger of two organisations - the Nature Conservancy Council for Scotland and the Countryside Commission for Scotland - to provide an integrated approach to environmental management and conservation of the natural heritage.

This may be illustrated with respect the emerging arrangements for responsibility for the management of the coast. Scotland's coast is described as a resource of national importance; it extends to over 10,000km of which over 6,000km is island coastline and it is a focus for population settlement, employment activity, investment and recreation. It contains many areas of special ecological and landscape importance which are recognised internationally and nationally (Scottish Office Development Department 1997). As a result of its intrinsic

social value and the complex nature of its public-private management regimes there is a recognised national interest in its effective planning and management for the wider community. This became particularly evident in the early 1970s, when the coastal impacts caused by the onshore development pressures associated with the North Sea oil and gas industry led to explicit intervention by the Scottish Office through the introduction of Coastal Planning Guidelines. These established a strategic policy agenda for priorities in the use of the coastal resource together with locational guidance on its practical conservation and development. Today, there is a strong advocacy for its integrated management to overcome the perceived shortcomings of existing institutional and administrative arrangements which include 'concern about the scope of the planning system, the low priority given to environmental considerations in the decision making process, the emphasis on the sectoral approach to decision making, the need for a more comprehensive and easily accessible data base on coastal matters, and the absence of an overall framework or strategic view of coastal management' (Gubbay 1995, p.2).

In response, the Scottish Office published updated strategic planning policy guidance for the coast, in order to provide greater support for the planning system (Scottish Office 1997). The general approach is to advocate a co-ordinated approach to coastal planning by local planning authorities. The National Planning Policy Guidelines advocates a partnership approach of local authorities working in conjunction with other appropriate bodies. In general policy terms, the NPPG states that development which requires a coastal location should generally be accommodated on the developed coast and should preferably look to reuse brownfield rather than greenfield sites. In planning terms, the NPPG suggests that development for which a coastal location is not required should not normally be permitted and any new development should be located so as to minimise its

environmental impact. The NPPG also sets out the provisos to be considered where development is permitted on the coast with respect to siting, design, impact on the natural and landscape quality and the implications for public access. In a number of capacities SEPA plays an important contributory role in the design and implementation of the coastal planning framework, but there are questions as to whether SEPA should have assumed a stronger strategic role in this context.

In this context, it is appropriate to note that in April 1998 the Government announced a review of the legislation relating to SEPA (and the Environment Agency in England) in order to identify any barriers to the bodies' adopting and executing an integrated approach to the environment. The emphasis of the review will be the possible rationalisation of the practical aspects of the legislative and regulatory arrangements. The purpose of the review is to examine the nature of the legislative powers laid on SEPA because their inherited legislative powers remain distinct and as a result separate regimes cover the different environmental media - water, air, waste, industrial processes and radioactive substances. The review will consider the mechanisms which SEPA operates and the simplification of the control regimes (Department of the Environment, Transport and the Regions 1998).

SEPA - STEWARDSHIP OR REGULATION?

SEPA was created out of a specific convergence of political and economic ideas about the appropriate form and extent of government intervention with respect to environmental protection. Now that it is in existence, it has a huge challenge to address as it is likely that the environment - in terms of its quality, protection and stewardship - will continue to assume a high priority on the Scottish Parliament's agenda.

SEPA's new tasks and responsibilities show also that the expectations of the body are high and are growing. It is clear

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that SEPA is expected to be a proactive environmental body and not simply a reactive regulative forum. SEPA has an important leadership role here in sustaining the environmental debate in Scotland against what will inevitably be a panoply of other competing political interests. The social construction of environmental problems involves ensuring that they are accepted as legitimate in different arenas, such as the media, government, the scientific community and the public. Indeed, this involves certain pre-requisites for the successful construction of an environmental problem. These are establishing the scientific authority for and validation of environmental claims; popularising issues in order to bridge environmentalism and science; capturing media attention; dramatising the problem in symbolic and visual terms; securing economic incentives for taking action and acting as an institutional sponsor to ensure both legitimacy and continuity (Hannigan 1995). SEPA can operate alongside all these steps in ensuring that the environmental agenda is not overlooked and similarly that specific environmental conflicts attract the appropriate political attention that they deserve.

Furthermore, the challenges facing SEPA are significant. In particular, it will face an increasingly complex arena of competing demands on the environment. The conflicts and pressures on the accountability of arrangements in the face of interest group politics will represent a major challenge to the organisation. It is evident that a feature of many environmental planning and conflicts at the present time is the increasing presence and pressure of specific interest groups. These are emerging as very complex forms of social or community organisation. Middle class interest groups, for example, tend to advocate relatively negative, exclusionary or protectionist pressure on planning procedures and are themselves differentiated by different characteristics such as property assets, cultural assets and organisation assets (Savage, Barlow, Dickens

and Fielding 1992). Nonetheless, the emerging power and influence of such interest groups is increasingly evident in the environmental and planning arena (Baldassare and Wilson 1996). This is compounded by the politics of place where interests are more severely articulated and conflicts more acute. It has been argued, for example, that in the 1990s, the emerging and established regulatory form 'depends on the translation of nationally articulated policy criteria into norms and tests to be applied to specific projects as they are "fitted onto" their sites. Any wider concerns about places and their qualities have then to be translated into equivalent and compatible performance criteria' (Healey 1998, 2).

In these circumstances it is likely that the principal challenges facing SEPA will centre not on its technical and scientific competencies but on its accountability and relationship to communities engaged with environmental matters. In particular, questions as to the democratic openness of SEPA will arise at different levels, including Scotland as a whole in terms of the overall quality of the natural environment and, perhaps more importantly, in specific interests groups and localities. In the late twentieth century it is argued that

public policy is typically framed as if place and space were irrelevant. There are many arguments in the contemporary period to support the neglect of place and space. The dynamics of our economies these days seem to have floated free of locations and borders. Strategies to deregulate markets pay little attention to spatial consequences. New forms of regulation, even of environmental externalities, focus on the site or the firm, not the site and the firm in their local setting. (Healey 1998, p.2).

Adapting to and reconciling this within a broader strategic agenda will become an important challenge to SEPA.

CONCLUSIONS

In light of the high quality of the Scottish environment, SEPA's

task in an unenviable one. It is more so when one considers its role as a 'non departmental public body' perhaps reflecting the argument that 'the institutions of British government remain rooted in a set of inconsistencies and lack of integrating logic' (Skelcher 1998, p.177). This is evident to the way in which environmental issues are considered within an explicitly market economic context with an emphasis on market failure (Hodge 1995). There are debates about the appropriateness of the market as a template for issues such as the environment, such as the 'green critique' of the society-economy-environment relationship with its questioning of economic growth as a primary economic priority (Ormerod 1994). In the final analysis, however, SEPA will have to operate within a very conventional context and respond to a host of competing demands.

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