

Shaping the future of our natural environment

**Green Party response to Defra's
“invitation to shape the Nature of England”**

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1. Preface

1.1 The Green Party welcomes the “invitation to shape the Nature of England” discussion document which is set out in a clear and comprehensive fashion. The challenges that the paper sets out are formidable and go to the heart of the modern economy.

1.2 We were very pleased that the consultation document acknowledged that quality of life is negatively affected by a degraded natural environment and that there are significant economic benefits associated with prioritising the protection and enhancement of the environment.

1.3 In particular we welcome the way that the document accepts that environmental issues cannot simply be boiled down to the important issues of climate change and carbon emissions. The paper does not flinch from highlighting serious and difficult problems. Broadly we think the paper asks the right kind of questions and its ambition is entirely admirable.

1.4 It is in the nature of any paper of this type that naming the problem is often far easier than identifying practical solutions, and we'd like to thank Defra for the opportunity to contribute to this discussion.

1.5 In this response we hope to outline some specific actions that we think are required, what implications these have for the economy and to touch upon some of the environmental issues that we face in the UK and abroad.

1.6 Our starting point will be that the natural environment is not a resource to exploit but an ever changing system that we can choose to deplete, pollute or replenish, choices that have profound implications for current and future generations. There is no such thing as a "robust ecological network" in the context of the twenty first century global economy. In fact we are reaching an environmental Rubicon which, if crossed, will become a global public health and security issue affecting billions rather than millions.

1.7 Nothing can step outside of the natural environment. While some aspects of life are affected more than others, there is, overall, a combined if uneven degradation of our environment from the cumulative impact of intensive farming methods, urban expansion, overuse of resources, traffic, waste, and a host of other factors that feed into one another.

1.8 In particular, we welcome the insight expressed on page 7, which says "We know now that nature is not static, but a series of living, working systems ('ecosystems') that change over time". Also, we were pleased to note on page 12 that, "Across Europe there has been recognition of the fact that existing legislation to protect the marine environment was sectoral and fragmented, and failed to deal with the cumulative impact that man-made pressures have on marine ecosystems".

1.9 We feel that the direct implications of these and recognition of the ecosystem concept require legislation to take a more holistic approach and regard the land and sea (together with the air above and the ground below) as a whole. A direct consequence would be that the management, exploitation and conservation within the whole unit should be consistent and coherent.

1.10 We understand that the picture at present is very far from this ideal. We would hope therefore that new legislation would lay a foundation for this shortcoming to be remedied with urgency.

1.11 Small incremental changes often add up to unexpected and dangerous developments. It's important that we are concerned with the small and local, as well as the big and global picture.

1.12 Clearly we should ensure that basic needs such as our water and air are safe and clean but we should not simply treat the natural world as an extension of our economy or a set of resources to profit from. We have a duty of care towards the planet for the sake of future generations. The ecological inheritance that we leave them should ensure that they have a decent world to live in. Likewise it is simply not just if the Global North preserves its inheritance at the expense of the Global South.

2. The value of natural resources in decision-making

Question 1 – What do we need to do to embed the true value of our natural resources in decision making at all levels?

a. How can we reflect all the different kinds of value described above?

2.1 Throughout the discussion document there is a tendency towards seeing our environment as a monetisable entity. For example in question 10 we are asked “how best could the economy reflect the true value of nature’s services in the way that business is done, to drive smarter, greener growth?”

2.2 Whilst this criterion may have the appearance of being objective, the process of valuation that underpins it is always necessarily subjective no matter how developed our techniques of economic valuation might be. How can we possibly put an objective price on the intrinsic value of our environment or regard nature as a set of “services”? Value that comes from resources like food and water, as well as from the contribution made by landscape, beauty, tranquility, distinctiveness and quality of place contribute to our whole experience of life.

2.3 By attaching monetary values to outcomes, we risk giving the impression that such outcomes can indeed be traded for each other. That is not the case. Some factors cannot be easily monetised. This then leads to those factors simply being ignored when the analysis is reduced to a purely financial one. Some are essential to life and wellbeing and should not, and cannot, be sacrificed.

2.4 All economic activity and our social and cultural wellbeing are dependent on the integrity of our natural systems. Continually increasing resource extraction, industrial throughput and waste production is entirely incompatible with ecological sustainability. An ecologically sustainable economic policy would promote systems that recognise the limits of, and are compatible with, both the natural systems of the planet and the aspirations of the whole of humanity.

2.5 Effects such as peak oil may well force us to re-evaluate our resource use, but the Green Party would like to see this process used for social good and avoid crisis points through long term planning.

2.6 In our view this means challenging the idea of growth for its own sake, or as an end in itself, which is irreconcilable with long-term security for our natural environment. Crucially, an economy that prioritises ecological sustainability and human happiness would have to be fundamentally democratised.

3. Effective natural asset management

Question 3 – What are the existing policies and practices aimed at protecting England’s natural assets (including but not limited to those set out above on our biodiversity, seas, water bodies, air and soil) that currently work most effectively?

a. What works less well – what could we stop doing or do differently?

Question 4 – What mechanisms should we focus on to ensure we manage our natural systems more effectively in future?

a. How should we define success?

b. How can we agree on common goals and assess our progress towards them?

3.1 In our view we need robust and well-enforced legislation criminalising pollution and environmental damage, combined with selective subsidy and support for the third sector to help produce socially positive and environmentally benign local enterprises.

3.2 We believe that reinstating the Sustainable Development Commission, which was producing valuable work before it was disbanded by the Coalition, is essential.

3.3 Indeed it is of great concern that the “bonfire of the quangos” may, in some cases, be a false economy that leads to under-regulation and a lack of accountability. Without democratically accountable national bodies overseeing the management of our natural systems we promote a dangerously *laissez-faire* approach.

3.4 With fewer resources those regulatory bodies that remain are at risk of being further influenced by the industries that they are supposed to regulate.

3.5 This would be of particular concern around the unwise sell-off of our forests. If this is permitted to go ahead we need to ensure that all Forestry Commission land is covered by legally-binding commitments on the new owners to maintain current policies for environmentally and socially beneficial use, particularly those on public access and on the restoration of planted ancient woodlands.

3.6 In our view we need a robust regulatory framework, funding for essential projects and prosecution of those companies that are responsible for pollution or other environmental damage. We also need strong mechanisms in place to monitor the use of non-renewable resources as well as their impact upon carbon emissions.

3.7 For example, the fish caught in European waters have reached unprecedented low levels, with the EU itself declaring that 88% of stocks are overfished, and 30% of “traditional” fished species are close to extinction. We would urge government to support a reformed Common Fisheries Policy which was consistent with the EU’s own Marine Strategy Framework Directive,

which requires member states to ensure “good environmental status” is achieved within their own waters by 2020, and that “good environmental status” should imply an ability to restore fish stocks to levels experienced in the 1950s.

3.8 We are also very supportive of the continuation of the ban on rolling out Genetically Modified crops in this country. We accept that scientific research in this area can be useful but still have great concerns about conducting a “grand experiment” in the wild with GM crops, especially as reports in the last few years have led to concerns about cross contamination and their impact upon the surrounding environment.

3.9 Air Quality studies, such as those conducted by the London Assembly, have an important role to play in developing strategy based on real evidence. One of the very last acts of the Labour government was to send the European Commission a further application for the UK to have an extension on the deadline to meet its air pollution targets. We hope the new government will be keen to take firmer action, faster.

3.10 However, taking action on air pollution requires bringing down the fares on public transport rather than allowing them to rise. It means placing cycle routes and car club schemes at the centre of positive alternatives and taking action on heavily polluting vehicles, like black cabs, with tougher regulation.

3.11 We should be looking to innovative approaches to flood plains. Across the country there is a real concern that cutting back on investment in flood plains combined with the constant pressure to build new houses may lead to false economies that may well lead to yet more ruined homes and wrecked lives that we have seen in floods during recent years.

3.12 The London Assembly’s Environment Committee recently came up with ground breaking proposals on floods plains in the capital – using existing parks and fields while actually recommending digging out and redesigning existing underground defenses, moving away from higher and higher concrete walls and using more natural defense methods that will, in the long term, be a far more cost effective of combating the danger of flooding in the capital as well as making London a nicer place to live. The lessons from these kinds of reports should be spread far and wide.

3.13 These kinds of planning issues also have implications for the kind of new housing we should be encouraging. Intensive land use for housing does not have to mean poor quality hovels or grey tower blocks and can mean a far lower ecological footprint than uncontained urban sprawl and suburbs particularly when combined with the best ecological practices.

3.14 As we see more and more nibbling at the edges of our green spaces, both rural and urban, we need to find a way to reverse the process, where instead of housing claiming ever more green spaces we can reclaim built up areas and turn them into more natural spaces.

3.15 The Greens have also argued for an Environmental Rights Commission - a watchdog to help individuals and communities fight to protect their environment from pollution and over-development.

3.16 In the UK, people’s rights to a decent environment free from pollution, over-development and other forms of degradation are simply not strong enough. But even where we have rights, it

can be incredibly difficult to uphold these against developers, businesses and often the Government itself. For many, legal fees in particular are simply unaffordable.

3.17 Just as the fight for women's rights was supported by an effective and properly-resourced statutory body, the Equal Opportunities Commission, so we need an independent body to help individuals and communities fight for their environmental rights. An Environmental Rights Commission would be on a statutory base, with sufficient resources to support legal challenges around environmentally damaging practices.

3.18 In its 22-year life, the Equal Opportunities Commission brought many test cases on issues such as pensions entitlements for part-time workers – cases that have meant justice for millions of women who had been discriminated against during their working lives. So too this new Environmental Rights Commission could bring cases in areas such as environmental human rights, protecting wildlife and biodiversity, or ensuring that new developments are truly 'sustainable'.

3.19 Defining success in these areas could, at times, be difficult. There are some measurable criteria such as carbon emissions, air and water quality, species and woodland preservation but also some aspects that are less measurable – preservation or creation of areas of beauty, health and general happiness of populations that have access to green spaces, and we are concerned that we account for the less measurable factors as well as taking a rigorous scientific approach to the quantifiable.

3.20 To ensure the ability of citizens, NGOs and the third sector to hold the government to account, all such data and reports need to be easily accessible to the public. This needs to be maintained where it is already happening and deepened in those areas where transparency is currently lacking.

4. Reducing our carbon footprint abroad

Question 5 – How best can we reduce our footprint on the natural environment abroad, through the goods, services and products we use?

4.1 The Green Party particularly welcomes this question as it raises the critical question of a new tendency to export our emissions abroad by the heavy reliance on imported consumer goods which obscures this nation's true carbon footprint.

4.2 We should be exporting renewable technologies and expertise, as a world leader in fighting climate change, rather than getting other nations to create our pollution for us. It is a terrible irony that while we benefit from the goods they produce, as poor nations they feel the greatest impact from the pollution created by industries working for us, are most vulnerable to their health impacts and are at greatest risk from climate change never having enjoyed the lifestyles that helped bring climate change about.

4.3 We should look to a greater set of 'eco-standards' on goods, whether they are made at home or abroad, and promote greater transparency when it comes to the goods we buy. Just as food stuffs list their ingredients, we believe that consumers should be able to make informed decisions based on the environmental and social impact of the products they buy.

4.4 We believe that monitoring and investigation are crucial to determine the true extent of the UK economy's environmental impact abroad. A thorough reporting process would help identify where we are complicit in the most damaging practices and we should investigate the possibilities of new legislation to guarantee the UK is having a net environmental benefit abroad not just in terms of greenhouse gas emissions but also the ecological impact of the goods we have produced and the practices of UK based firms abroad.

4.5 In particular the government should conduct a serious investigation into the impact of UK companies involved in the oil industry and resource extraction around the globe.

5. Engaging individuals, businesses and communities

Question 7 – How best can we harness and build on public enthusiasm for the natural environment so people can help improve it through local action, as informed consumers or by shaping policy?

Question 8 – What should be our vision for the role of Civil Society in managing and enhancing the natural environment and for engaging individuals, businesses and communities in setting the agenda for that work?

5.1 Active citizens are more than just consumers. In looking towards a more democratic, locally based economy we believe that communities are a vital building block of an environmentally sustainable economy. NGOs and community organisation contain a wealth of talent and skills, often donated for free out of love for their neighbourhoods.

5.2 Groups, like the Transition Town Movement, that are taking practical steps towards more self-sufficient communities and locally grown produce, are already playing an inspiring role in many parts of the country and we hope to see them and groups like them go from strength to strength.

5.3 Tapping into those groups is vital, but they can only be kept on board with any process if their involvement is meaningful. The right noises without the right kind of action is guaranteed to squander these citizen resources.

5.4 Some aspects of local planning are often driven by the commitment and energy of local organisations that have a fundamental role to play within society. Their role cannot be overestimated when it comes to issues of conservation and preservation of the natural landscape, their local knowledge and roots in the community make them an invaluable resource for those seeking to preserve the natural world. In other areas like energy, housing and transport the ability of local groups to directly influence national policy is more limited.

5.5 We also believe that decisions should be taken at the appropriate level. The onus for how our energy is produced or for the lack of green infrastructure cannot be placed on local communities alone.

5.6 In addition to being informed by the views of stakeholders, we need to take decisions informed by the best available scientific evidence. Robust scientific research into climate change and our impact on the environment, for example, needs to be marshaled in support of sound decision-making.

5.7 Some well-meaning language has, in the past, ended up being nothing more than meaningless consultation exercises with no real traction on decision making. Enabling citizens to have a genuine say in their local communities should be at the heart of local government, but it should not be at the expense of the public bodies that may be more appropriate when making strategic decisions.

5.8 The experience of deregulation and fragmentation of national bodies has rarely led to more empowered communities, but more often to a free-for-all usually won by those with enough political or financial clout. This cannot be the route that we take with our fragile ecological resources which need a coherent national and international strategy that accounts for the important role of local communities.

6. Incentives for local action

Question 9 – How best can Government incentivise innovative and effective action on the natural environment, across England, at the local level?

6.1 Whilst we would not reject out of hand Local Economic Partnerships which “promote the economic benefits of a healthy natural environment,” we need to move away from the financial utilitarian approach that regards our natural environment as a resource to be exploited.

6.2 Apart from the public health issues, the wider public good is not something that can necessarily be quantified in a balance sheet; indeed it can be directly opposed to the ability of a private company to make a profit.

6.3 When taking decisions on tendering, local and national government should consider bids based on their commitment to promoting biodiversity and long term sustainability of projects as a priority spreading good practice into the private sector.

6.4 In general new enterprises need a secure economic environment to start up and stay afloat. To this end a strong state commitment to provide resources and funding for locally based projects is essential and helps support private sector enterprises as well as directly funding state and third sector projects.

6.5 Often this was a role that Regional Development Agencies tried to play. The government has a central role to play in ensuring a stable environment within which practical action can flourish.

6.6 It is also worth drawing the distinction between genuinely positive contributions to the natural environment and ‘offsetting’. It is not acceptable to allow developers to claim that damage in one place can be offset by funding conservation activity somewhere else.

6.7 It may well be worth exploring the idea of experimental beacon communities to show what can be done, trialing innovation and to lead the way in techniques and policies that can be spread across the country having been proven to have real benefits.

7. Reflecting the true cost to nature

Question 10 – How best could the economy reflect the true value of nature’s services in the way business is done, to drive smarter, greener growth?

7.1 The paper correctly identifies that “new jobs and opportunities can be created from activities which protect and enhance the natural environment” but our concern is that the economic strategy outlined in the recent Comprehensive Spending Review actually may reverse that trend and directly result in the loss of jobs involved in these activities already by those directly employed by local and national government, but also those jobs that will be effected by a knock on effect as grants dry up and government support is no longer available.

7.2 The paper suggests that “we need to respond to these pressures in a sustainable way that protects and enhances the ecosystems” and we would like to draw out some of the questions that this statement raises.

7.3 ‘Sustainable’ has become a much used term in recent times and it is worth finding clarity over its specific use here. An approach that is overly focused on growth may be economically sustainable in the medium term whilst resulting in policies that are ecologically disastrous.

7.4 The Green Party believes that we need a coherent programme of investment to create the green infrastructure that is so urgently needed if we’re to shift to an economy that nurtures the natural world, and create new green jobs.

7.5 While businesses can, of course, play a valuable role in this we cannot rely on market forces to independently do the kind of ecological heavy lifting that is not just desirable but essential for future generations in creating a low impact economy.

7.6 If greener growth means a massive investment programme in infrastructure, housing improvements, and cutting edge green technologies then this would be a very welcome development. However, our finite planet does not have the capacity to carry infinite growth and our atmosphere does not have the capacity to carry infinite greenhouse gas emissions.

7.7 If our planet is to remain not just habitable but a pleasant and fertile place to live in then we will have to accept that beyond a certain limit there may be no such thing as ‘green growth’ at all and that new economic models aiming to live within our ecological limits are the only viable long-term options.

7.8 Reflecting the true value of the natural systems means acknowledging the fact that we are currently living beyond the means of our planet.

8. Priorities for international action

***Question 14 – What should be the priorities for the UK’s role in EU and international action, to protect and enhance the natural environment at home and abroad?
(see also our answers to question 5)***

8.1 The UK still retains jurisdiction over 14 Overseas Territories (UKOTs), and through our treatment of these we can extend the reach of our influence over the planet’s biodiversity for good or ill. Whilst UKOTs are small in terms of land mass, their total Exclusive Economic Zones are well over eight times larger than that of the UK mainland and encompasses over 6.5m km² of ocean habitat, much of it still in good condition.

8.2 In addition, the UKOTs are arguably more important than the UK metropolitan area in terms of biodiversity. Around 85% of the UK’s endemic species and 84% of our threatened species live in the UKOTs; one third of all albatrosses live in the UKOTs; Gough Island is the most important seabird island in the world; and Chagos has the world’s largest coral atoll and the world’s cleanest sea water. If the UK is to fulfill its international commitments towards halting biodiversity loss and increasing marine protection, then the UKOTs must play an important role.

8.3 We welcome the 2009 publication of the UK Overseas Territories Biodiversity Strategy and the acknowledgment by the previous government within it that “Biodiversity in the UK Overseas Territories is globally significant”. However, given this acknowledgment, we are disappointed that the strategy also states that the UK Government “cannot be expected to meet the full costs” of conservation.

8.4 We hope that the current government may take a different view. We support the Royal Society for the Protection of Birds’ 2007 report “Costing Biodiversity Priorities in the UK Overseas Territories” which recommended that £16m per annum is needed to adequately fund biodiversity protection within the UKOTs, and also recommended that one single government department take on responsibility for overseeing this work. The current situation – where responsibility is divided across Defra, the FCO, DfID and DCMS – cannot be expected to result in the most cost-effective or joined-up approach.

9. Conclusion

9.1 The section on the overarching challenges for the White Paper refers to using 'natural resources beyond their capacity for renewal' and also describes climate change and population growth as key threats. We would agree and draw DEFRA's attention to climate research from the Potsdam Institute which suggests that average global emissions will need to be reduced by at least 60% of the 1990 baseline by 2030.

9.2 This equates on average to a 90% reduction in emissions by developed countries like Britain by 2030 yet the targets for greenhouse gas reduction which have been set are not commensurate with the scale of the problem. The primary aim of such targets ought to be stabilising greenhouse gas concentrations at or below 450ppm CO₂ equivalent, which is what the scientists agree is needed in order to keep the atmospheric temperature rise below 2°C above preindustrial levels and thus to significantly reduce the likelihood of catastrophic climate change.

9.3 This is a significant challenge that will require real change, and a shift away from short term press release policy making towards long term obligations that cannot simply be left to market mechanisms. Of course, there are still low hanging fruit in emission reduction, in energy conservation and reduction that are easily as vital as the switch to the use of renewable energies. Projects rolling out home insulation would provide a social good as well as reducing the significant impact that our housing has on our ecological footprint.

9.4 It is the Green Party's view that equity is not in contradiction to shrinking the waste and pollution of our modern consumer society. Indeed, warmer homes, cheaper bills, employment opportunities in the manufacturing and building trades as well as more efficient and cheaper public transport are social levelers that can create a happier society as well as a more ecologically sustainable one.