

# ENVIRONMENTAL POLICY FORUM

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Rt Hon Owen Paterson MP  
Secretary of State for Environment, Food and Rural Affairs  
Defra  
Nobel House  
17 Smith Square  
London  
SW1P 3JR

26<sup>th</sup> April 2013

Dear Mr Paterson,

## **Developers Can Pay To Rip Up Nature (Sunday Times, 21<sup>st</sup> April 2013)**

The recommendation in the recent report of the Ecosystem Markets Task Force (EMTF) referred to in this article – namely that the Government mandates a national system of biodiversity offsetting – is massively premature.

We are only half way through six two-year pilot biodiversity offsetting projects and it is far too early to draw conclusions about the value of such an approach. Indeed two-year pilots are themselves a woefully short timescale to judge the proposed approach given the time it takes for any natural habitat to become properly established and colonised.

The Environmental Policy Forum (EPF), a network of UK environmental professional bodies promoting environmental sustainability and resilience for the public benefit, represents thousands of professionals engaged in many aspects of the environmental planning and development process. We are concerned that the Task Force's call for government action at this stage is part of a marketing exercise designed to railroad the government into a decision and to appease developers. This is likely to backfire badly as sceptics of offsetting may now interpret the Government's pilot projects as little more than a tick-box exercise in evaluating a scheme that they have already decided upon.

For example, in the report under '*Priority Recommendation 1: securing net gain for nature through planning and development*' the first benefit of an offsetting programme that is identified is 'saving developers time and money'. This hardly reassures those who are concerned that offsetting could be misused as a way of circumventing the established and proven approach to managing development impacts on biodiversity, namely 'Avoid – Mitigate – Restore – Compensate'.

Biodiversity offsetting is a form of compensation. As such it may well have its place in managing development but any form of compensation must always be a last resort. There are natural habitats that cannot be created within acceptable timescales and others which, even though it may appear superficially as though new habitat has been created, may take tens or even hundreds of years to become fully functioning and able to support the full diversity of species that occurred on the area that has been lost.

We are greatly concerned that the proposed system of 'funding' for the new habitat maintenance is only for [30-40] years, through uncertain intermediaries, and there is no

certainty that any 'new habitat' even if created, and whether mature or not, will in itself be sustainable without such management, or indeed that such management will be itself sustained. This has all the hallmarks of ill thought out, incomplete and facile planning.

We are furthermore troubled at the potential for newly created habitat (as part of an offsetting scheme) to be deemed suitable for development in its early stages as it is likely to be assessed as of low ecological value. There must be assurances that habitat created through offsetting is protected from further development through to its fully functional intended state.

There are also other factors to consider including the potential decline in the local community's access to natural areas which are so important for people's health and wellbeing, and we see no analysis of the cost:benefit of such matters, or the financial impact in terms of QALYs (Quality Adjusted Life Years), for example. All of which makes these proposals appear to be of very poor quality compared to other parts of the world - the USA, for example, takes a much more sophisticated and holistic approach to such assessment.

The members of the Environmental Policy Forum do not wish to see the artificial debate of 'development or nature' prolonged. We firmly believe that we should be exploring solutions to have both whilst accepting that there is a line in the sand, both legally and morally, where biodiversity loss is unacceptable and unwise. In the absence or impossibility of other preferred solutions, biodiversity offsetting may, in some circumstances, provide a solution to some issues, but it is not a universal panacea. The evidence base is small and yet to be developed, and it is essential that decisions regarding what those circumstances might be are based on rigorous evaluation of scientific evidence - and not a bandwagon of developer-driven enthusiasm.

The jury is still out on biodiversity offsetting. Let it do its work.

Yours sincerely,



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