

Biodiversity offsets - an unnecessary evil?

The Government is consulting on the introduction of biodiversity offsets to speed the planning process.¹ The notion of biodiversity offsets might offer a reasonable solution to the vexed questions of how to compensate adequately for environmental harm resulting from development. But there are some fundamental flaws both in the concept itself and in the philosophy and accepted assumptions which underpin it.

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If it is accepted that development is inevitable, necessary or desirable then it seems reasonable to do this in a way which causes no net environmental harm. This is the basis for biodiversity offsetting. By placing a value on the destruction of habitat, developers might be persuaded to avoid or minimise damage in order to avoid the costs of compensatory action. The threat of penalties reinforces the mitigation hierarchy of 'avoid', 'mitigate', 'compensate', allowing offsets to mop up the residual harm and ensure no net loss of biodiversity. However the approach is problematic.

Irreplaceable habitats

An immediate problem is faced with irreplaceable habitats – or habitats which cannot be re-created in any meaningful time scale. Ancient woodland falls within this category, but so do other high conservation value habitats that have taken decades or centuries to develop and could only be re-created, if at all, with a similar passage of time. The idea of like-for-like compensatory measures is thus meaningless and we are thrown back on creating something which has a notional equivalent value in 'biodiversity units' but no ecological equivalence.

The proposals insist that in these cases, paragraph 118 of the National Planning Policy Framework will provide the assurance needed.² But at the Woodland Trust, as our case load for ancient woodland under threat shows³ this is circumvented by the catch-all convenient phrase for government and developers... "unless the need for, and benefits of, the development in that location clearly outweigh the loss".

Missing the point

Whilst there are plenty of ways of deriving a value, there is no absolute objective value for the natural environment. Even if one accepts one or other form of environmental valuation, each is, generally, locationally specific and subjective. Not subjective is the sense that 'it is just a guess', but in the sense that the valuation is relevant to those who are affected by it.

The idea of biodiversity units is no different. Assessment on the basis of quality, distinctiveness and area is proposed in Defra's green paper. But this is insufficient to

capture critical aspects of value which relate to people's relationship to the habitat or its relationship to other habitats.

In this sense biodiversity offsets misunderstand the nature and use of valuation. Valuation allows the exchange of different goods through the medium of a token of exchange (usually money) but it has little meaning in this context. If I have a bag of onions and I want an alarm clock, the ability to sell the onions and use money to buy a clock is a useful mechanism. The equivalence is in value, not in function.

New woodland, for all that it may be of value in other ways, is not ancient woodland and does not represent home habitat to many characteristic ancient woodland species. Even if it were possible to derive equivalence in value, there would be little equivalence in function. The problem is made worse if 'biodiversity units' can be substituted across habitat types, so that grassland could be replaced by woodland and vice versa.

The point about environmental valuation is not to create an objective value (money or 'biodiversity units') which can then be used for exchange, but to form part of a discursive process of negotiation in which those aspects to which people ascribe value are highlighted.

The government consultation stresses the creation of a market for biodiversity supported by simple metrics to help by removing the need for 'expensive negotiation' on a 'case-by-case' basis. But it is this negotiation that it is the heart of revealing the value of particular 'case-by-case' places. By removing negotiation and resorting to simple metrics the very essence of the process of establishing value is destroyed. Biodiversity offsetting deliberately sets out to circumvent the process of public participation on environmental decisions which is at the heart of Aarhus Convention, to which the UK is a signatory.⁴

The suggestion is that small areas of lower quality habitat may be of less importance than large areas of high quality habitat. In strict biodiversity terms this might seem reasonable, but not if this is the only patch of habitat within easy reach of where you live. The valuation approach suggested militates against the small remaining fragments of habitat that may be of critical importance to many communities.

Not a market

A market is a place (real or otherwise) that allows buyers and sellers of a good or service to interact in order to facilitate an exchange. In this case the government has decided that it is the owner of the environment and therefore the 'seller'. Developers of course are the buyer. Those people who might better be regarded as the 'owners' of the specific local environment, those with a direct stake in that environment, are removed from the process by the abandonment of 'expensive' negotiation.

This is not a market in any sense, it is a permit system. If you want a system which discourages developers from destroying the environment and makes them think again about mitigation then an 'expensive' negotiation process sounds a lot more

effective than a presumably inexpensive system of purchased permissions to destroy the environment.

Location, location, location

The world is not a fair place. But biodiversity offsets have the capacity to make it less fair. It is often the case that there is a strong correlation between social status and environmental quality. Bluntly, poorer people often have to put up with a poorer environment and a lack of easy access to green space.

If the link between a site and its immediate surrounding is broken by the ability to compensate at considerable distance from a development, then the possibility of greater polarisation of environmental quality becomes real. The proposals call on local authorities to identify areas where offsets are likely to generate the greatest environmental gain. The assumption is that this will extend or strengthen areas which already have significant environmental value.

'Nicer' places are enhanced by further environmental improvement - extensions to nature reserves, creation of 'wilderness', coastal retreat and so on. Meanwhile, while small areas of green space close to where people live are swallowed by development. The argument that "allowing offsets to happen anywhere offers the opportunity for creating coherent ecological networks", exposes a need which should be met, in any case and by other means, while failing to safeguard what is important locally. We should be creating and managing habitat in order to strengthen that which remains, not funding habitat creation through the destruction of that which needs protecting.

All problems are solvable

Biodiversity offsetting panders to the hubristic belief that there must be a solution to every problem that allows us to have what we want without any consequences. This is the world in which there is such a thing as a free lunch, in which you can have your cake and eat it. The confidence with which the Defra consultation asserts its ability to 'guarantee' no net loss of biodiversity is either breath-taking in its naivety or reprehensible in its interpretation of the evidence.

It would be naïve to believe that we can avoid further destruction of habitat without some fundamental shift to our collective worldview - which seems unlikely. Habitat will continue to be lost, but these proposals will make it cheaper and easier for developers. Biodiversity offsets will not protect environmental value let alone lead to an increase in net value, because this is not a meaningful calculation in the way it is proposed.

It is motherhood-and-apple-pie to say that the planning process should be no more burdensome or expensive than is necessary. But it should be as strenuous and exhaustive as required to safeguard the legitimate interests of those affected. This offsetting proposal will by-pass that and become a voucher system for developers than will lead to the loss, not just of valuable and irreplaceable habitat, but of areas that are a fundamental importance to communities.



The Woodland Trust promotes its message of stringent protection for ancient woodland.

Photo: Woodland Trust Photo Library

Deliberately removing negotiation because it is expensive and inconvenient, violates the principle of public participation in decision making and further erodes any claims the government might make about being the greenest ever.

As part of the Woodland Trust campaign on biodiversity offsetting we said to supporters that we believe that, if offsetting does take place, it should be at a local level - but what does 'local' mean to you?

- national
- regional
- county
- within the same city, town or village
- within a set distance of the original habitat

The clear winners were 'within a set distance of the original habitat', followed by 'within the same city, town or village'. The least popular options were 'regional', 'national', and 'county'.

The following are some of the comments from supporters to the campaign:

"I value the habitats close to me because they provide a link and preservation of local flora and fauna, and allow me to appreciate and enjoy the versatility of life".

"The area where I live is extremely heavily populated but we are lucky enough to have open space within a ten minute ride. The loss or reduction of these amenities both to people and wildlife would make me inconsolable".

"Being in amongst [our local habitat] is calming, enlightening, makes us happy and able to forget (or solve) our problems".

"I value the environments and habitats NEAR ME precisely because they ARE near me".

"The most important thing for me about the natural environments close to where I live is to be able to take my grandchildren to play in rich, wild (to them), multi-layered, diverse, beautiful and memorable places where they can climb trees, dam streams, pick blackberries, make dens and marvel at beetles and butterflies".

"Through local walks I am strongly aware that I, as a human being, am only part of the natural world".

"I value EVERYTHING about my environment! That's what makes it MY environment! I am sick to death of having to "adjust" and "offset"!!"

"I value the open areas around me which I pass daily. I do not want them to disappear so that all I can see is bricks and concrete".

References

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