what progress in improving the natural environment in england?

Peter Jones looks back at the main elements in the 25 Year Environment Plan in the light of the progress report issued by the Office for Environmental Protection and the government's first revisions of the plan

For over a decade, successive UK governments have emphasised their commitment to protecting and enhancing the natural environment. In 2011, for example, the then Conservative/Liberal coalition government made a commitment to 'embed sustainability in all it does' and to 'be the greenest Government ever'.[1] In *Forward Together,* the Conservative and Unionist manifesto for the 2017 general election,[2] there was a 'pledge to be the first generation to leave the environment in a better state than we inherited it' and a commitment to 'produce a comprehensive 25 Year Environment Plan that will chart how we will improve our environment as we leave the European Union and take control of our environmental legislation again'.

The following year the Conservative government published a 25-year plan, *A Green Future,* designed to 'improve the environment', and more specifically to:

> *'champion sustainable development, lead in environmental science, innovate to achieve clean growth and increase resource efficiency to provide benefits to both our environment and economy, and keep our pledge to hand over our planet to the next generation in a better condition than when we inherited it'.*[3]

However, a report published by the Office for Environmental Protection in January 2023[4] would seem to call government commitment to the environment in England into question. This short article recalls the main elements in the *Green Future* 25 Year Environment Plan, summarises the contents of the report from the Office for Environmental Protection, and offers some wider concluding reflections.

Our Green Future

In his Prime Ministerial foreword to the 25 Year Environment Plan,[3] David Cameron recognised that:

> *'Our natural environment is our most precious inheritance. The United Kingdom is blessed with a wonderful variety of natural landscapes and habitats and our 25 Year Environment Plan sets out our comprehensive and long-term approach to protecting and enhancing them in England for the next generation.'*

The ambitious plan, described as 'a living blueprint for the environment covering the next quarter of a century', looked to set out 'government action to help the natural world regain and retain good health', and aimed to:

> *'deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.'*

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As an aside, in late January 2023, the government announced details of its new Environmental Land Management scheme, as part of its 'reform of agricultural policy and spending' in England,[5] but that is outside of the scope of this article.

Underlying the 25 Year Environment Plan was the recognition that 'the environment is life-giving', that it 'nourishes and nurtures all life, human, animal or plant', that 'we rely on our blue and green spaces for food, water and the air we breathe', that the natural world also underpins our nation's prosperity and wellbeing, and that the environment delivers 'calculable economic benefits'.[3] The plan outlined ten ambitious '25-year-goals', namely:

- 'Clean air.'
- 'Clean and plentiful water.'
- 'Thriving plants and wildlife.'
- 'A reduced risk of harm from environmental hazards such as flooding and drought.'
- 'Using resources from nature more sustainably and efficiently.'
- 'Enhanced beauty, heritage and engagement with the natural environment.'

In addition, the plan looked to manage pressures on the environment by:

- 'Mitigating and adapting to climate change.'
- 'Minimising waste.'
- 'Managing exposure to chemicals.'
- 'Enhancing biosecurity.'

More substantively, the plan addressed a wide range of policies. As such, it included the sustainable use and management of land; protecting nature and conserving the natural beauty of landscapes; connecting people and the environment to improve health and wellbeing; increasing resource efficiency and reducing pollution and waste; securing and protecting clean, productive and biologically diverse seas and oceans; and protecting and improving the global environment.

In addressing the sustainable use and management of land, for example, the first aim was to embed 'an 'environmental net gain' principle for development including housing and infrastructure', which essentially looked to leave the natural environment in a measurably better state than beforehand. As such, this recognised the government's political commitment to a major increase in housebuilding and infrastructure development, as part of a pledge 'to create better places for people to live and work'.[3]

In looking to achieve this aim, the 25 Year Environment Plan emphasised a number of themes, including net gain for biodiversity, stronger new standards for green infrastructure, exploring the potential for protected species licensing to be expanded and include more species, delivering better outcomes for wildlife, as well as a more streamlined process for development, and determining appropriate locations to pilot a revolving land bank for rural areas. There was also a focus on working to reduce costs to developers by expanding net gain approaches to embrace natural capital benefits such as flood protection, recreation, and improved air and water quality.

In explicitly addressing the relationship between housing and planning in contributing to sustainable development, the plan stressed its commitments that 'environmental protections already enshrined in national planning policy will be maintained and strengthened', that 'new development will happen

in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage', and that 'new homes will be built in a way that reduces demands for water, energy and material resources, improves flood resilience, minimises overheating and encourages walking and cycling'.[3]

At the same time, the 'environmental protections already enshrined in national planning policy' were to be 'maintained and strengthened', while 'enhancement of the Green Belt [would] make this land 'breathing space' for our urban populations to enjoy, and our diverse wildlife to flourish, while delivering the homes this country needs'—in the wider belief that 'positive environmental outcomes can help reduce local opposition to development, shorten the planning process, cut operating costs for infrastructure and increase the desirability of new homes'.[3]

Other aims under the sustainability umbrella included designing and delivering a new Environmental Land Management system, improving soil health and protecting and restoring peatlands, expanding woodland cover, and reducing the risk of harm from flooding and coastal erosion. The focus on restoring peatlands, for example, is rooted in the belief that peat bogs are important wildlife habitats, and that they can improve water quality and play an important role in flood management and climate regulation. The 25 Year Environment Plan also looked to increase tree planting through the creation of new forests and by incentivising planting on both private land and poor-quality agricultural land.

Nature recovery and enhancing the natural beauty of landscapes were also important goals in the plan. Here, a number of elements were seen as being important in contributing to meeting these goals: a 'strategy for nature' designed to 'tackle biodiversity loss' and the development of a 'Nature Recovery Network to complement and connect our best wildlife sites', along with the provision of 'opportunities for the reintroduction of native species', 'exploring how to give individuals and organisations the chance to deliver lasting conservation', and 'improving biosecurity to protect and conserve nature'.[3]

Greening towns and cities was recognised as an important element in connecting people with their environment. Here, green and blue spaces in the built environment were seen as essential to health and happiness, and the 25 Year Environment Plan claimed that the provision of more and better-quality green infrastructure would make towns and cities attractive places in which to live and work, and would help to promote local social interaction and a strong community network. In looking to create additional green infrastructure, the aim was to improve existing green infrastructure by encouraging more investment, to ensure that new developments included accessible green spaces, and to draw up a national framework of green infrastructure standards.

Progress report

A report published early in 2023 by the Office for Environmental Protection[4]—a public body established in November 2021 to protect and improve the environment by holding the government and other public bodies to account—painted a bleak picture of progress in the initial delivery of the 25 Year Environment Plan.

In her foreword to the report Dame Glenys Stacey, Chair of the Office for Environmental Protection, remarked that:

> *'progress in protecting, restoring and improving the environment over the year under review falls far short of that required to meet Government's stated, longer-term ambitions. We have little good news to report.'*

In 'assessing Government's environmental stewardship', the report argued that the 25 Year Environment Plan lacked 'essential foundations' but that the 'exceptional challenges' the government had faced in recent years had 'exacerbated a lack of coherence in environmental strategy and policy'. Further, the Office for Environmental Protection stated that 'our view is that the [25 Year Environment Plan] has so far failed to bring about the changes needed, at the pace and scale required, to meet Government's stated ambitions for the environment in England', and that—arguably much more tellingly—'the natural environment in England remains under serious threat'.[4]

The 25 Year Environment Plan does not specify measurable outcomes, and in summarising its findings on whether or not the government's plans for the environment were working, the Office for Environmental Protection presented two sets of indicators. On the one hand, of '32 trends across the breadth of the natural environment; nine trends were improving, eleven were static, and eight were deteriorating', while it a lack of evidence made it impossible to make a sufficiently reliable assessment of trends in four areas.[4] More specifically, while trends for clear air and climate change mitigation were seen to be encouraging, the decline in biodiversity was deeply discouraging.

On the other hand, 23 environmental targets were assessed, and the Office for Environmental Protection found none where the government's progress was demonstrably on track. More specifically, in 14 of the 23 targets, progress was seen to be off track—for a variety of reasons, it proved impossible to assess the other nine targets. More generally, the report noted that targets relating to water quality, and to halting the decline in the abundance of species, were at significant risk of not being achieved. At the same time, it observed that progress towards climate change adaptation had been poor, and that many of the steps deemed necessary to adapt, and to improve resilience, had not been taken. Tellingly, the report noted that,

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The Office for Environmental Protection report found the decline in biodiversity deeply discouraging

while some two-thirds of the land in England is in agricultural use, it was particularly concerning that climate change adaptation within this sector was consistently given the worst rating by the Climate Change Committee.

The report cited a number of factors to help explain why the 25 Year Environment Plan has not yet delivered improvements. Here, the initial failure to identify what could have been used as a comprehensive baseline for the state of the environment, or for the plan to specify clear targets and changes in strategy and policy responsibilities for the environment, were seen to be internal factors. At the same time, the Covid-19 pandemic, the war in Ukraine and the more recent cost of living crisis within the UK were identified as important external factors. Taken together, these factors were seen to have contributed to a lack of coherence in, and delays to, environmental strategy and policy.

More positively, the report identified a number of opportunities to secure significant environmental improvements. These opportunities include the development of a new Environmental Improvement Plan which would look to translate the government's original vision into wide-ranging environmental commitments and policies. Such a plan would require clear governance arrangements and delivery mechanisms, which would define outcomes, including targets and how such targets would be delivered.

In arguing that the government's published data on the natural environment is not adequate for monitoring progress across all 10 goal areas of the original 25 Year Environment Plan, the report emphasised the need to use robust current data and analysis that are clearly aligned with all targets. At the same time, the report argued that a new Environmental Improvement Plan should establish an 'evaluation framework and use it to generate feedback on actions and progress, to learn and improve delivery'.[4] Further, the report argued that a new Environmental Improvement Plan should diagnose the cause of adverse trends and develop effective responses and assessment regimes.

Concluding reflections

While the Office for Environmental Protection reached what is essentially a damning verdict on progress on the 25 Year Environmental Plan for England, it also explicitly recognised that its recipe to secure significant environmental improvements was effectively a call for a new Environmental Improvement Plan.

The government published its revised *Environmental Improvement Plan 2023*[6] at the end of January, looking to build on the original vision of the 25 Year Environmental Plan by 'setting out how we will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress'.[7] The revised plan was welcomed by Tony Juniper, Chair of Natural England, who described it as 'an ambitious and integrated plan, setting out a package that is broad and geared towards hitting targets', but he counselled caution in advising 'what is required now is a concerted effort across government and society to translate its intent into action'.[8] It remains to be seen how the new plan is rolled out, and there are five wider issues — namely sustainability, growth, the role of technology, offsetting, and the role of the current planning process — that arguably should be more fully recognised in drawing up a new plan.

First, while the 25 Year Environmental Plan claimed that the government would 'champion sustainable development', and Michael Gove, then Secretary of State for Environment, Food and Rural Affairs, concluded his foreword with the hope that it would 'ensure that this country is recognised as the leading global champion of a greener, healthier, more sustainable future for the next generation',[3] sustainability is not really at the heart of the plan. Thus, while plan refers, for example, to managing land sustainably, putting more sustainable drainage systems in place, a sustainable fisheries policy, and supporting and protecting sustainable global agriculture, it is not anchored in a comprehensive and all-embracing vision of sustainable development.

Such a vision must embrace economic development and social equity, as well as recognition of the finite nature of many natural resources and the management of others, such as land, water, soil and plants, within boundaries that allow the resource to renew itself. Without such a foundation, there is the danger that the word sustainability is just being used as a convenient catchphrase which, at best, pays lip service to the concept of sustainability and, at worst, is effectively used both to justify development and to conceal its impact. Here Mansfield's argument that conventional approaches to sustainability fail to recognise 'the political nature of the socio-ecological

processes that produce environmental degradation, poverty, and injustice'[9] also resonates.

Secondly, the Environment Plan explicitly acknowledged the inevitability of growth in that, for example, it 'recognises the government's ambitions for a major increase in housebuilding (300k extra homes a year by the middle of the next decade) and infrastructure investment, and the importance that these have for people's lives and economic growth'.[3] However, such continuing growth places demands on the Earth's finite resource base, and as such can be seen to be incompatible with the concept of sustainability. That said, the emphasis within the plan appeared to be on 'clean growth'.[3]

Clean growth, defined in the government's Clean Growth Strategy as 'growing our national income while cutting greenhouse gas emissions',[10] is seen to underpin the 25 Year Environment Plan's commitment to 'environmentally sustainable growth'.[3] That said, Fankhauser[11] has argued that while this strategy signalled a strong commitment to decarbonisation, 'there are also many aspirations rather than tangible policy commitments', and that there was little or no specific detail in the Environment Plan on how clean growth is to be achieved. Even less positively, in examining Canada's climate commitments, Carroll *et al.* described clean growth as 'an aspect of the integral state', that benefited 'dominant economic and business interests and [sidelined] the views of critical, transformative social-justice sectors of Canada's environmental community'.[12]

'The emphasis within the plan appeared to be on 'clean growth' ... That said, there was little or no specific detail in the Environment Plan on how clean growth is to be achieved'

Thirdly, technology is seen to have a vital role to play in the government's Clean Growth Strategy. On the one hand, the Environment Plan reported, for example, on the mobilisation of private capital into sustainable technology in energy, water, waste and air quality projects and on developing technologies to ensure that a higher proportion of plastics are re-usable—and, looking to the future, stated that the plan would be revised and refreshed to take account of fast-moving changes in technology. Here, the focus was on using technology to enable profitable solutions to environmental problems that also have a positive impact on environmental and social challenges.

More specifically, visions of technological solutions promoting a transition to net-zero greenhouse gas emissions have received a mixed reception. For example, while arguing that 'developing and deploying climate technologies is critical for the world's net-zero agenda', McKinsey and Company[13] also suggested that 'reaching net-zero emissions will require an immense effort to invent, refine, and deploy climate technologies'. Friends of the Earth Scotland[14] has argued that many of the 'speculative negative emission technologies' are 'politically and practically unfeasible, and are also likely to cause wider environmental damage and human rights abuses'. More generally, Schor[15] suggested a note of caution, in that 'the popularity of technological solutions is also attributable to the fact that they are apolitical, and do not challenge the macrostructures of production and consumption'.

Fourthly, until suitable and affordable technological solutions are available, growing numbers of companies have employed natural solutions—principally offsetting—to reduce carbon dioxide emissions and biodiversity losses. Indeed, the 25 Year Environment Plan advised that listed companies can invest in tree planning and peatland restoration projects to offset their carbon emissions. Carbon Neutral Britain,[16] which claims to be 'helping British business and individuals make an impact on climate change', funds projects in Britain and around the world to reduce the net amount of carbon dioxide emissions in the Earth's atmosphere in the belief that 'planting trees [is] the most sustainable way to do this, as forest projects absorb CO_2, refract [the Earth's] heat as well as having a positive impact on wildlife, ecology and biodiversity'.

Despite the widespread popularity of offsetting, it has its critics. Watt,[17] for example, has talked of the 'fantasy of carbon offsetting', and claimed that the process has 'been beset by problems and failures, and relies on the mobilisation of supportive discourses and knowledge-claims to retain a sense of credibility'. Dalsgaard[18] has suggested that 'the funding of emission-reducing projects [is] seen as donations of development aid, instead of being assumed to compensate for the donor's emissions'. In dismissing carbon offsetting as 'a dangerous distraction', Friends of the Earth[19] has argued that 'carbon offsetting and nature offsetting are both worsening the climate and nature emergencies. They can't be made to work, at least not at scale, and trying to do so is [a] dangerous distraction from the real job at hand, cutting carbon emissions and restoring nature.'

In January 2023 the *Guardian*[20] newspaper reported that research by the *Guardian*, *Die Zeit*, and *SourceMaterial* into Verra—described as 'the world's leading carbon standard', and which is used by a number of leading global corporations—found that more than 90% of its rainforest offset credits are 'likely to be 'phantom credits' and do not represent genuine carbon reductions'.

Finally, in outlining how the government would manage land sustainably, the 25 Year Environment

Plan claimed that the government wants to 'put the environment at the heart of planning and development'.[3] Here, the role of planning is seen to be important — for example in strengthening the requirement for planning authorities to provide biodiversity net gains, and possibly to make such gains a mandatory requirement; in maintaining and strengthening environmental protections already enshrined in national planning policy; and in enabling local planning authorities to target the environmental enhancements that are most needed in their areas.

In many ways, the environmental protections in the planning system are designed to prevent environmental harm, and there is a need to strengthen the statutory obligations to enable the planning system to deliver a wider range of environmental goals. That said, at a time when local planning authorities are increasingly expected to embrace a wide range of new initiatives, including digitalisation and design coding, whether they will have the specialist expertise, and the resources, to discharge such obligations remains an open question.

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Notes

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