

English Nature's response to Royal Commission on Environmental Pollution's invitation for Suggested topic areas for new RCEP study.

English Nature believes that all the suggested topic areas are valid but our reply is organised in order of preference where we think most value is to be had from an enquiry, starting with the highest priority from our perspective.

Implementation of environmental policies

We believe that this is the area of highest priority but suggest that the remit of the study be framed differently. We suggest that the study also considers the Government's strategic approach to environmental policy and how this is framed in relation to other key policy areas, such as the economy. In particular, we would welcome enquiry into the level of evidence and understanding about the way that the quality of the environment and the health of our ecosystems underpin and contribute to our future social and economic welfare. There is a strong feeling in the environmental community that some EU member states have grasped this point as a matter of strategic direction, but others are not so forward thinking. It would be useful to consider the UK in this context. Our hunch is that the economically thriving regions of tomorrow will be those that protect their environment today.

This issue is relevant currently to debates about better regulation, which are framing policy making both domestically and in the EU. Often, environmental policy decisions involve impacts on a particular sector, which may have a strong political voice. Against these needs to be weighed the wider benefits to society as a whole from a better environment; these benefits may be much more significant but are more diffusely spread through society as a whole, may be more long term and may be difficult to measure. Getting the right policy choice in this equation requires, in our view, a strong strategic approach to environmental protection. In this context we support the new UK Sustainable Development strategy and are watching closely its implementation.

We support the specific questions suggested on policy implementation, though note that there are a wide range of issues specified, so it is a question of whether the study can do justice to all of these. There is now a reasonable amount of evidence about the effectiveness of different policy measures that can be drawn upon.

Water in the UK

We would welcome this study. The health of the fresh-water environment is of great importance to our nature conservation goals. This environment experiences pressures from multiple sources and is providing some of the most difficult challenges for English Nature in pursuit of its objectives for Sites of Special Scientific Interest (SSSIs) and the Biodiversity Action Plan. Note that in addition to our designated river and lake sites, we have many wetland SSSIs whose condition is related to the health of the freshwater environment. All the issues you mention are relevant to us, ie water resources, abstraction, point and diffuse source pollution. Also of concern to us are issues relating to river restoration (to a more natural morphology), flood risk management, invasive species, and the impacts of climate change.

This proposed study deals with concerns about multiple pressures and sustainable use, which are relevant to environmental policy in general.

Our overall view of the policy environment is that good mechanisms are now in place to deal with point source issues, through the water price review process. Some policy measures are being put in place for diffuse pollution, though more significant measures will be needed soon in our opinion. Likewise for water resource demand management. There is also now legislation in place to deal with environmental pressures in a holistic manner, through the Water Framework Directive. A great deal of thinking about the implementation of the Directive is now taking place, which the RCEP would not wish to duplicate. However, the Directive is in its early stages so the study may have a lot to contribute to the development of policy and its implementation in this area.

Nuclear energy: framing the environmental debate

This is clearly a highly topical issue. One question for the RCEP is whether, given the proposed short timescale of the Government's energy review, it could complete a study in time to contribute to the current policy debate. If such a study were to go ahead, we would recommend framing the environmental considerations in terms of all environmental impacts of nuclear power, on a long term, whole life cycle basis, including impacts in the UK and abroad. This evaluation should be set in the context, albeit possibly outside the scope of this study, of a similar approach to the environmental impacts of other energy sources.

The environmental considerations are closely linked to the economics, which should ideally consider fully both environmental costs and subsidy issues across all energy sources, and also consider opportunities for demand side management rather than focus entirely on how to supply an assumed level of need.

Noise and light pollution

These impacts are probably not at the top of list in terms of challenges facing nature conservation in the UK, but they can be significant, for example in their effects on breeding birds. Consequently we would support such a study if it were to go ahead. These issues fit a pattern that we are observing especially in our lowland areas, whereby the previous level of outright habitat loss from agricultural intensification and other activities is now lessening in scale, but there are still cumulative impacts from a variety of sources which impact adversely on the quality of remaining habitats. English Nature has sponsored a number of research reports on the impacts of noise and light from transport and recreation, which we would be pleased to make available.

Novel substances

While we also support this study in principle, it is of less immediate relevance from our perspective, and we wondered whether it would be sufficiently different from the recent study on long term effects of chemicals.

English Nature.

23 December 2005