

Evidence to the Environment, Planning and
Countryside Committee relating to the Environment
Strategy for Wales 2005

Further Evidence by
Friends of the Earth Cymru

November 2005

Friends of the Earth Cymru

Friends of the Earth Cymru inspires solutions to environmental problems which make life better for people.

Friends of the Earth Cymru:

- is dedicated to protecting the environment and promoting a sustainable future for Wales
- is part of the UK's most influential environmental campaigning organisation
- is part of the most extensive environmental network in the world, with over 60 national organisations across five continents
- supports a unique network of campaigning local groups working in communities across Wales
- is dependent upon individuals for over 90% of its income

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Introduction

Friends of the Earth Cymru welcomes the development of an Environment Strategy for Wales and the opportunity to provide further evidence to the Environment, Planning and Countryside Committee. Our consultation response to the Environment Strategy concentrated on the need to address climate change across the board. We wish to submit extra comments on the high level commitments and the scope of the outcomes proposed in the draft Environment Strategy for Wales.

Our Environment - Our Future – Your views

The high level commitments for 2025, as outlined, do not go as far as the UK sustainable development strategy, published March 2005¹. This strategy's guidelines have been agreed by the Welsh Assembly Government, along with the UK government and other devolved administrations. Nor do the commitments go as far as the Assembly's own Sustainable Development Scheme - see section 4.2 - which makes commitments about environmental limits, polluter pays, and the precautionary principle. A clear reference should also be made to the Welsh SD Scheme.

The UK strategy has five interrelated guiding principles, one of which is "respecting the limits of the planet's environment, resources and biodiversity". The high level commitments in the Wales strategy on the other hand are much weaker, instead talking about "making a contribution to sustainable development" and "real improvements in biodiversity" and recognising "what is special about the Welsh environment". These commitments do not equate to recognising environmental limits, and are therefore inadequate. Environmental limits can be explained simply as broadly quantifiable limits to the damage that the earth's natural systems can sustain before they cease to function properly. Although increasingly well understood, these limits are rarely (if ever) reflected in policy and law, let alone actual consumption and production patterns.

Nor will these existing commitments safeguard the environment as they signify nothing in practical terms. In practice, these commitments will allow economic development to take precedence in every situation. The result will be that, in Wales, the boundaries of development will be constantly pushed further and further. This can already be seen in biodiversity terms in the disregard of SSSIs for instance with regard to large development projects, or the dismissal of local biodiversity action plans in land-use planning or in resource extraction.

Friends of the Earth Cymru recommends that the high level commitments are amended to state clearly that they recognise environmental limits and propose measures to ensure that these limits are sacrosanct.

Where the Wales Environment Strategy talks about the environment "contributing to the economic prosperity, cultural heritage and the quality of life of people in Wales", the UK SD strategy goes to the heart of the matter in its guiding principle, stating that a strong sustainable economy is one where environmental and social costs fall on those who impose them (the polluter pays principle). While the high level commitment outlined in the Environment Strategy hopes to minimise the negative local and global impact of lifestyle and consumer choices, it does not state that the economy will be held responsible where it is the main instigator of such negative local and global impacts on environment and society. For example, the approval of an open cast mine in Merthyr Tydfil, where the levels of ill health are higher than most places in the UK, show that Wales is failing to deliver a healthy environment for all, and in particular the poorest communities.

¹ http://www.sustainable-development.gov.uk/documents/publications/strategy/SecFut_complete.pdf
Securing the Future

Friends of the Earth Cymru recommends that the high level commitment describing the environment as contributing to the economic prosperity of Wales is amended to reflect the UK and Welsh Assembly SD strategy guiding principle to recognise the polluter pays principle, and proposes measures to ensure that people and the environment are protected from such polluters.

The UK SD strategy recognises that good governance means effective participation not just consultation and basic communication. The Environment Strategy for Wales fails to even articulate a high level commitment to participation as a part of delivering the Environment Strategy in Wales. The Aarhus convention establishes a number of rights which are not referred to by the strategy².

As stated by the UNECE (United Nations Economic Commission for Europe): “The Aarhus Convention is a new kind of environmental agreement. It links environmental rights and human rights. It acknowledges that we owe an obligation to future generations. It establishes that sustainable development can be achieved only through the involvement of all stakeholders. It links government accountability and environmental protection. It focuses on interactions between the public and public authorities in a democratic context and it is forging a new process for public participation in the negotiation and implementation of international agreements.”

The Environment Strategy should state a high level commitment to communicating and promoting these rights as a necessary part of good environmental governance.

Friends of the Earth Cymru recommends that the high level commitments are amended to include a statement recognising the role of the Aarhus convention, and a commitment to promoting these rights to people in Wales.

Managing the Land and Sea

The commitment to a clear framework implies a commitment to clear and integrated policy guidance, which currently doesn't exist. The Wales Spatial Plan, TANs, Ministerial statements, and PPW 2002 all provide guidance on 'management of land and sea', and therefore need to work with the targets and objectives set by the Environment Strategy. In effect, the relevant TANs and Planning Policy Wales should be 'policy-proofed' against the Environment Strategy in order to ensure integrated policy guidance.

In particular, the format of the Wales Spatial Plan, where unaccountable and undemocratic area groups are proposing projects without extensive local or regional involvement or expertise (particularly in the environmental sector) is of extreme concern. The Wales Spatial Plan is part of the framework and yet the Environment Strategy here makes no reference to it, or how the Wales Spatial Plan is seen to be part of the framework for 'managing the land and sea'. The Planning and Compulsory Purchase Act 2004 states that local development plans must have regard to the Wales Spatial Plan, which to all intents and purposes is the current published document. The area groups, project initiation documents etc are not referred to within this legislative framework.

The Environment Strategy must set out clear environmental limits and the fair use of resources for existing and future generations as the guiding principles for the management of land and sea.

Friends of the Earth Cymru recommends that the policies for mineral extraction, transportation, housing and other buildings, energy generation, recreation, agriculture, forestry and fisheries are subject to the guiding principles of environmental limits and participation in decision making, and climate change is recognised as a first among equals issue to be addressed.

² UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (<http://www.unece.org/env/pp/welcome.html>)

Friends on the Earth Cymru recommends that the Environment Strategy include the following outcomes for energy generation, farming, and transport:

- At least 40 per cent of Welsh electricity demand to be generated by Welsh renewables by 2020.
- No new nuclear power stations and the closure of Wylfa nuclear station on Anglesey because of safety concerns.
- Major investment in energy efficiency schemes and new powers for Wales to set high energy efficiency standards for new housing.
- Introduction of policies and targets for renewable heat and renewable fuels for transport, such as hydrogen.
- No GM crops to be planted in Wales
- More investment in sustainable farming and an increase in the number of organic farms in Wales.
- Support for local producers and markets to help farmers get a fair price for their produce
- Much more investment in public transport for everyone
- Less traffic on roads and cuts in road building
- Greener cars to become more widely available
- Funding for safer cycling and walking routes
- A move from road building to improving public transport links in rural and urban areas.
- A programme of major investment in public transport and traffic management measures to be implemented in urban areas dominated by car use.

Sustainable use of resources and ecosystem services

An additional outcome should be measures to prepare for the necessary services required to implement the WEEE Directive. Wales is still far behind Germany and other European countries in recycling terms and in reduction of packaging.

Friends of the Earth Cymru recommends that the outcomes are exchanged for specific outcomes which will enable Wales to become a zero-waste nation in 25 years:

- High recycling targets for every Local Authority
- Doorstep recycling for every household
- A ban on building new incinerators
- Support for industry to minimise waste and reduce unnecessary packaging

Biodiversity

The loss of biodiversity will only be halted if local Biodiversity Action Plans, the Habitats Directive, and international, European, national and local designations of conservation interest are actually considered sacrosanct. There will be no reverse in the loss of biodiversity if economic interests continually take precedence –which is the situation at the moment. Examples of this are the approved extraction of aggregates in the Rheidol river valley, the proposed motorway across the Gwent Levels, and the proposed extension to the national gas network through the Brecon Beacons and Wye Valley (the Transco gas pipeline). A considerable amount of biodiversity has already been lost through over-production in farming practices, unwise and inappropriate development, and the ever increasing pressure on natural resources. The outcomes set out in the Environment Strategy are very weak and management oriented. What is required are measures for protection which are respected by the Assembly itself, and consequently other levels of government and the economic and social sectors in Wales.

Friends of the Earth Cymru calls on the Environment strategy to set out its respect for sites of international, European, national and local importance and to protect these sites against development, and to build on these sites to link them to each other and so ensure the increase of biodiversity.

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