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**Building a better society:  
Net environmental gain from building as a driver for improved social  
wellbeing**

**Ian Bateman**

The Land, Environment, Economics and Policy Institute (LEEP)

The University of Exeter Business School

[i.bateman@exeter.ac.uk](mailto:i.bateman@exeter.ac.uk)

***Alongside economic inequality, the poorest in society also have to live in some of the most degraded environments in the country. Poor environments compound the misery of poverty and directly contribute to low levels of health and wellbeing. The paper outlines a funded approach to address this problem.***

## **Summary**

The poorest in UK society almost invariably suffer the most degraded environments. Yet environmental enhancement both directly improves wellbeing and regenerates local economies. However, plans for enhancing social wellbeing via environmental improvement suffer from a chronic lack of funding. Recent proposals to require that housing and infrastructure developments deliver net environmental gain clearly offer the potential for restoring the UK's degraded natural assets. However, by applying a number of straightforward principles such policy could also deliver substantial improvements in the wellbeing of those who currently suffer the poorest environments in the country. The paper outlines these principles, thereby providing a route for enhancing both the environment and social wellbeing.

## **Introduction**

Human wellbeing is, to a considerable extent, a product of its environment. High quality environments can significantly enhance the health and lives of those that experience them. Conversely those who have to endure low quality environments often suffer poor wellbeing, degraded health and lower life expectancy (Health Council of the Netherlands, 2004; Corvalán et al., 2005; Maller et al., 2005; Guite et al., 2006; Pretty et al., 2007; Boyce and Patel, 2009; Power et al., 2009; Marmot, 2010; Geddes et al., 2012; Larson et al., 2016; Coldwell and Evans, 2018). Yet in real terms (adjusting for inflation) spending to enhance environmental quality, especially in terms of urban or peri-urban green infrastructure is at an historic low (CLGC, 2017; HLF, 2016). Therefore, any proposal to improve wellbeing through enhancement of the environments in which people live also needs to find a funding source for such improvements. A potential funding source arises from proposals within the Government's 25 Year Environment Plan (HM Government, 2018) and subsequent consultation (Defra, 2018) for the introduction of a Net Environmental Gain requirement upon new building and potentially infrastructure.

This note presents options for using the Net Environmental Gain proposals to improve both the natural environment and social wellbeing.

### **UK House Building: Policies, practice and poverty.**

UK Government house building targets, announced by the Chancellor of the Exchequer in the Autumn Budget 2017 (HM Treasury, 2017) and recently reaffirmed (House of Commons, 2019a), are to increase housing supply to approximately 300,000 new houses per year by the mid-2020s. This represents a huge increase over present levels of house building which stood at 162,270 in the year to March 2019, an increase of only 1 per cent over the previous year (MHCLG, 2019a). Even these optimistic targets stand in contrast with findings from planning research which suggests a shortfall of housing supply of up to 4 million homes just across England (Holmans, 2013) implying a need to build 340,000 homes per year over the next decade to meet demand (Bulman, 2018), a figure significantly higher even than the government's aspirations. Furthermore, despite recent announcements from the Chancellor regarding funding to increase the proportion of affordable homes to 10% of the government's housebuilding targets (Collinson, 2019), figures from the Ministry of Housing, Communities & Local Government (2019b) suggest that attempts to address housing poverty are failing with just 1-2% of new housing being for social rent and that even this number is falling (Partington, 2018).

Housebuilding in the UK therefore occurs in a market of excess demand as reflected in long term price rises. As of May 2019 the average house price in the UK was £229,431 and rising by 1.2% per annum (Land Registry, 2019). Combined with the very low rates of social housing construction, this means that those benefiting from new house building are almost exclusively the relatively more affluent, certainly when compared to the poorest sections of UK society who, as the above trends show, are increasingly ignored by the house building sector.

This is important because the knee-jerk thinking with respect to net environmental gain compensation is to locate this as close as possible to the area where building has taken place. The simple logic runs that as this is the area where loss has occurred then this should be the location for any net gain project seeking to compensate for that loss. As we discuss in further detail below, this thinking is flawed and appears prompted by an undercurrent of political expediency which argues that in the world of local planning and politics such a 'local compensation rule' might ease fears over net environmental gain deterring building and a desire to make it easier for new developments to go ahead. Somewhat perversely this may result in an increase in land take for building which, if compensation is poorly designed, may increase environmental impact (de Zylva, 2018). Even more perversely, it may result in a decline in social wellbeing if the net environmental gain principle is not implemented with an awareness of its implications for those facing the poorest environments.

Yet the potential for improvement is enormous. Taking the current average house price and the Government's house building target then even just a 1% compensation charge would raise nearly £700million per annum (the issue of who should pay this charge and who should undertake compensation schemes is briefly discussed in Annex A). Such a sum is equal to roughly one third of the entire operating budget of the Department for the Environment, Defra (House of Commons, 2019b). If targeted carefully this is sufficient not only to generate enormous environmental gains but also to facilitate lasting improvements in the wellbeing of those facing the worst living conditions in the UK. However, this will only be delivered if net gain policies are implemented in ways which avoid simplistic rules and instead follow principles which deliver to both the environment and wellbeing agendas.

#### **House building, impacts and net gain compensation: Location, location, location**

The principles underpinning the concept of net gain appear straightforward: for a net gain to arise then the benefits to society have to outweigh the costs. The concept of a net environmental gain confines those benefits and costs to the environmental realm but the principle is the same; for a net gain to arise then the environmental benefits to society have to outweigh the environmental costs. This has to hold irrespective of wider costs and benefits (including housing, impacts on incomes and the economy, etc.), the sum of which one would also expect to be positive.

While these principles are straightforward, the devil is in the detail. One issue is to clearly define terms such as environmental; society; benefit and cost. Annex B discusses these terms in greater detail. A further, often overlooked yet vital issue is that the location of any compensation scheme will fundamentally influence the benefits and costs it delivers and the distribution of those values across society (Perino et al., 2014; ONS, 2018). As a simple example consider the issue of recreational open space delivered through the establishment of an open-access woodland. Locating this near to the urban fringe is likely to generate much greater benefit values than the establishment of an objectively identical woodland in a remote rural location accessible to only a small population (Bateman, 2009). This value also varies according to the availability of alternative, substitute resources (*ibid.*). Location decisions can therefore have major effects upon the redistributive impacts of compensation schemes.

We are not starting from a level playing field; poorer communities live in lower quality, more polluted environments (Fecht et al., 2015). This inequality is exacerbated by poorer populations having relatively lower ability to travel and access higher quality resources. Given the very strong evidence (cited earlier) that poor quality environments also lead to lower levels of wellbeing and health this

means that locating compensation sites near to disadvantaged groups can bring major benefits to those populations.

### **Three approaches to locating net gain compensation sites**

We can identify three, mutually exclusive approaches to the siting of net gain compensation schemes: (i) pure net biodiversity gain (ii) local gains and (iii) net environmental and social wellbeing gains (which we refer to as net natural capital gains for reasons explained subsequently). We discuss the pros and cons of each of these approaches as follows:

#### **(i) Maximising net biodiversity gain**

Perhaps in a step towards the 25 Year Environment Plan (H.M. Government, 2018) objective of requiring net environmental gain, the UK Chancellor of the Exchequer recently announced that the forthcoming Environment Bill will mandate net biodiversity gain for UK infrastructure and housing development (HM Treasury, 2019).

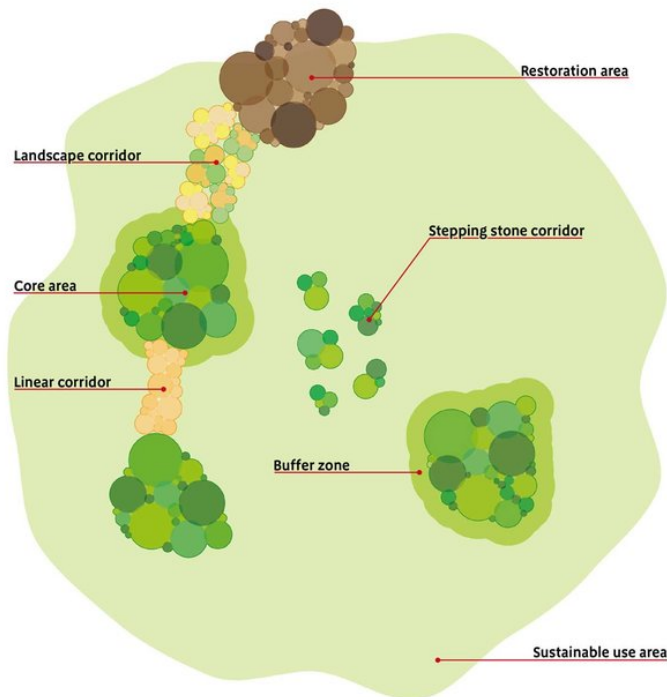
The definition of biodiversity is contentious (see Annex B). A first issue is that wild species cannot thrive separately from the ecosystems upon which they depend and so species and habitats need to be considered as the system they are. A second issue is that people are typically not interested in biodiversity as scientifically defined; literally the diversity of species in an area. So, in any given area, eradicating one species and introducing two others increases biodiversity. However, if the lost species is the skylark and the new others are pigeons and rats then it is unlikely that this net biodiversity gain would be seen as beneficial. In other words, “net biodiversity gain” would be better termed as “net gain in wild species which people value”. A third issue is that, even if we redefine in this way, there is evidence to indicate that people care not just about which species are under consideration, but also where any gain might occur, with a clear preference for improvements near to where the person expressing the preference lives (Badura et al., 2019). This is problematic because this latter result implies that there is a trade-off between gains to species and gains to people. With lower gains occurring near to where someone lives being preferred to greater gains in remote locations.

Despite this preference for gains occurring nearer to whoever is expressing a preference, locating ‘net biodiversity compensation’ next to sites which have recently been developed is extremely unlikely to optimally improve wild species of conservation interest. Those development sites will be highly disturbed, artificial environments. Designating compensation sites next to such areas does not mean that they will provide suitable habitat for displaced species. Furthermore, the species that might take

advantage of such sites may well be of no conservation interest whatsoever, while the resources available for compensation might deliver great conservation gains if targeted to places that really need them (CIEEM, 2016).

This prioritisation of locations on purely conservation grounds was highlighted by the acclaimed Making Space for Nature report (Lawton et al., 2011). This exposed the fragmented nature of wildlife sites across the UK and argued persuasively for investments in the creation of an ecological network, linking sites through a variety of corridors (see Figure 1).

Figure 1: Optimal location of compensation sites for net biodiversity gain - Types of corridor site.



Source: Lawton et al., (2011).

The use of net environmental gain funds to create Lawton style biodiversity corridors offers the best use of net gain compensation in terms of improvements to the viability of species of conservation interest. Given the population reductions in many such species over the last half century, this approach should be considered as an important element of a compensation programme. However, such an approach on its own will do very little to enhance social wellbeing as it results in compensation projects which are located in areas which are good for wild species rather than people.

In summary, the maximisation of net biodiversity gains as defined above provides the best outcome for wild species but very little in the way of social wellbeing improvements. To deliver both requires that net biodiversity gain compensation needs to be complemented by other strategies.

**(ii) Local gains for local people**

Both planners and politicians favour the locating of net gain compensation near to development sites (RTPI, 2019; Suff, 2013). Such an approach avoids the need for a national strategy and eases the administration of a compensation scheme. However, as we note above, the tying of compensation to the locality of developments can result in poor value for money in terms of the wild species gains it can provide and might even further degrade biodiversity unless endangered species are adequately protected (CIEEM, 2016).

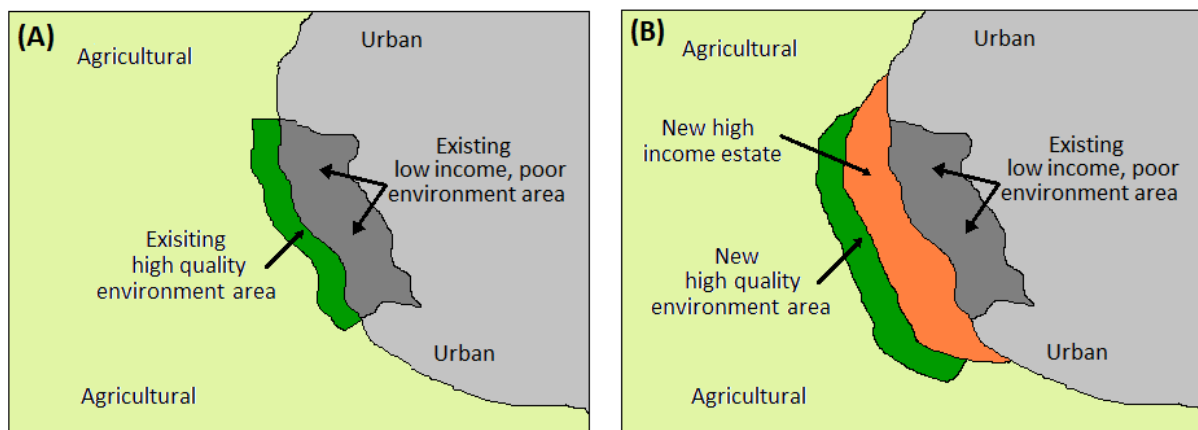
Procedures for locating compensation schemes have to reflect the impacts of alternative siting if they are to be effective. Alongside biodiversity concerns, it is easy to demonstrate that constraining compensation to areas close to development sites can make social wellbeing gains trivial or even turn them into losses, worsening the environmental inequality which characterises many countries (Baek and Gweisah, 2013; Grunewald et al., 2017; Kasuga and Takaya, 2017) and is particularly prevalent in the UK (Fecht et al., 2015).

To demonstrate this, consider Figure 2. Here Panel (A) shows a pre-development situation where a relatively economically poor neighbourhood which internally suffers from low environmental quality can benefit from an adjacent high-quality environment area. A good example of this is my own home area of Handsworth in inner city Birmingham which, while being economically disadvantaged, nevertheless benefits from the undeveloped land that forms Sandwell Valley Park. Access to such environments can significantly enhance the wellbeing of the local community.

Panel (B) of Figure 2 shows a new situation for the area considered where a new estate of executive homes has been built on the land which previously provided access to a high-quality environment for the disadvantaged community. This is hardly an unusual or highly hypothetical scenario. There is a high demand for property on the edge of urban areas as these combine ease of access to central business districts with high quality environments. Consequently builders are keen to supply such homes as they command high prices and deliver excellent profits. Demanding that such schemes provide net environmental gains yet constraining these compensation schemes to the local area is highly likely to result in outcomes such as that shown in Panel (B). Here the local compensation requirement results in an 'executive garden' positioned to favour the new estate. This is a likely outcome because it allows the developer to market their new executive homes as having excellent access to such high-quality environments. However, comparison of Panels (A) and (B) shows that it is

the low income/poor environment area that are the losers, yet it is the high-income executive home owners who have captured the compensation.

Figure 2: Environmental capture by developers and high-income new home owners: How local net gain compensation can reward the rich and penalise the poor



Comparison of Panels (A) and (B) shows that while the higher income population who occupy the new development area have easy access to the high-quality environment created under the net gain requirement, the distance to such areas has actually increased for the low-income community. That both the benefits of and visits to parks and other recreational sites declines with increasing distance is well established (Bateman et al., 2006; Mowen et al., 2007). However, there is also ample evidence that this distance decay effect is significantly stronger for those with lower as opposed to higher incomes (Doucouliagos and Hall, 2010; Stevens et al., 2014). Therefore, the decline in expected visitation rates for the poorer community in Figure 2 is even greater than might be expected from simply looking at the increased distance to high quality environments.

Tying net environmental gain compensation to local areas is therefore likely to ‘compensate’ winners, rewarding them for their economic power and elevating the welfare gain they have already achieved through purchasing a new home, which will almost certainly provide a higher level of wellbeing than their previous residence. In effect local compensation requirements can deliver environmental capture to winners while penalising losers, exacerbating the welfare loss experienced from nearby developments.

Real world examples of such situations abound. For example, near to my own University, the Victorian terraces of St James originally faced onto open fields which, in the post WWII era were developed into the desirable detached housing of Pennsylvania (RGS, 2019). While the former population were clearly



the losers, the residents of Pennsylvania could now enjoy views over the fields of Duryard and ready access to nearby Stoke Woods and Mincinglake Valley Park.

The mantra that compensation should be kept local is deceptively simple and attractive, yet likely to be deceiving. At very least we should insist that it is the true losers that should be compensated otherwise 'local gains for local people' can actually lead to losses of social wellbeing.

**(iii) Net environmental and social wellbeing gains (net natural capital gains).**

Natural capital refers to "those elements of the natural environment which provide valuable goods and services to people, such as the stock of forests, water, land, minerals and oceans" (Natural Capital Committee, 2017). The natural capital approach to decision making, which is now central to UK official guidelines for public spending (H.M. Treasury, 2018) and the Government's 25 Year Environment Plan (H.M. Government, 2018), emphasises the need to consider the multiple costs and benefits arising from any change in the environmental system and also requires that multiple alternatives be assessed when a decision is made (Pearce et al., 1989; Costanza and Daly, 1992; Turner and Daily, 2008; Bateman and Wheeler, 2018). Because the natural environment is an interconnected system, changing one element (such as developing an area of land) will generate multiple effects (e.g. building houses and delivering accommodation will often lead to changes in food and timber production, wild species habitat and biodiversity, water use and quality, greenhouse gas emissions, recreational access and associated physical and mental health, etc.). All of these impacts and trade-offs need to be considered when setting compensation levels and comparing alternative sites for net gain.

In order for compensation to deliver net environmental gain then it needs to be delivered in terms of the physical environment rather than just in monetary terms, for example as a payment to the coffers of local authorities which might be spent on a multitude of ends and risks the possibility of the environment being effectively sold off to bolster local government budgets (echoing the concerns of de Zylva, 2018). This does not however mean that the nature of any physical compensation has to be like-for-like with that which was lost. Indeed like-for-like compensation can often be poor value for money (if better alternatives are available), impractical and in technical terms physically impossible in terms of exact replication (CIEEM, 2016). However, for compensation to also deliver social wellbeing gains then the value of benefits must exceed the value of the loss. If we want those social wellbeing net gains to help the disadvantaged rather than those who have already benefited from the new building then we have to reject the "Local gains for local people" approach resulting from simplistic rules such as requiring that compensation should be as close as possible to the building area.

Two alternative net natural capital gain approaches can be identified, each delivering both net gains in terms of the natural environment and social wellbeing. The first is applicable where policy makers demand that compensation remains local. This is to identify those local areas which, if their

environmental quality was enhanced, would deliver net gains to the population suffering the loss from new developments (as opposed to the winners from that development as shown in (ii) above). For example, considering Panel (B) of Figure 2, it might be that brownfield environments within the low income / poor environment area could be enhanced using compensation funds.

The second approach arises where the constraint for local compensation can be removed. Here potential compensation schemes can be considered across the country, focussing in on those communities which endure the most adverse conditions nationally. By definition this virtually has to deliver greater gains than can be provided under the local compensation constraint. Furthermore, this will provide funds for restoring areas that are so degraded they deter development even in nearby locations. Such areas are never likely to benefit from net gain rules if local compensation rules are applied, yet these are precisely the areas which could benefit most from such gains. For these reasons we strongly advocate net natural capital gain approaches to implementing the net gain proposals in the 25 Year Environment Plan.

## **Conclusions**

The introduction of a net environmental gain requirement for new building and infrastructure has the potential to generate substantial funding for compensation schemes. With careful design these schemes can deliver net improvements in both environmental and social wellbeing, contributing to reducing the environmental inequity which characterises much of the UK. However, a key determinant of the success of such schemes will be whether or not they are located in the right places.

Simple rules such as requiring that compensation has to be as close as possible to the location of development are likely to reduce the environmental and social wellbeing gains that could be delivered by such funding. We recognise that local politics and planning will want to capture such funds and there may have to be some oiling of local wheels. However, even within the wider areas within which developments occur there is the potential for compensating those who have gained most from those developments (including those who now live on former greenfield sites) while those who have lost access to those sites benefit little from compensation schemes which occur within or as close as possible to those new developments.

But it does not have to be this way. We have the data in order to target compensation to both benefit the environment and raise social wellbeing amongst the most disadvantaged groups in the country. By seizing this opportunity, net gain initiatives can contribute to reshaping and improving the UK environment in ways which most readily address social disadvantage.

### **Annex A: Who pays? Who delivers?**

Recent policy announcements have confirmed that developers will have to fund net biodiversity gain schemes (Defra, 2019) and it can be assumed that this principle would be extended to net environmental gain (H.M. Government, 2018). But a further issue concerns whether those that pay for compensation schemes (e.g. developers) are also the best placed to undertake such schemes. Bringing in 'mitigation agencies' (groups of specialist compensation schemes specialists including natural scientists such as ecologists, hydrologists, soil scientists, as well as social scientists such as recreational planners, etc.), may well lead to higher value for money outcomes, particularly where competition between such agencies is permitted through mitigation markets (Wende et al., 2005; Froger et al., 2015; Levrel et al., 2017)

### **Annex B: Net environmental gain - Principles and practical challenges**

The principles underpinning the concept of net gain are straightforward: for a net gain to arise then the benefits to society have to outweigh the costs. The concept of a net environmental gain confines those benefits and costs to the environmental realm, but the principle is the same; for a net environmental gain to arise then the environmental benefits to society have to outweigh the environmental costs. This has to hold irrespective of wider costs and benefits (including housing, impacts on incomes and the economy, etc., the sum of which one would also expect to be positive, but that is beyond the present remit).

While the principles are straightforward, the practice is more complex and essentially consists of defining each of the terms emphasised above, specifically: **environmental; society; benefit and cost.**

- **Environmental:** This has frequently been confined to impacts upon wild species or biodiversity (although these two terms are very definitely not interchangeable and the subject of rigorous debate and definition elsewhere, see for example Maron et al., 2018). Certainly 'wild species of conservation interest' (a much clearer and preferable concept) are an essential element of environmental gains or losses. However, they are not the totality of environmental impact and a policy which restricts itself solely to the conservation of wild species is very unlikely to be delivering the best net gains to society. Other valuable environmental benefits include: Outdoor, open access recreation (which in turn can generate substantial mental and physical health benefits); Impacts on the water environment in terms of quality, quantity and flood risk; Soil health, stability and resilience; Greenhouse gas balance (including storage of carbon and reducing emissions of carbon dioxide, nitrous oxides, methane and other greenhouse gases); Amenity views to both local residents and those passing through the area; etc.

- **Society:** Gains and losses are defined in terms of effects upon people. This is the typically the case even when appeals are made to concepts such as biodiversity which, strictly speaking, simply refers to the variety of plant and animal life in a defined location. Under such a non-anthropocentric and objective definition, the replacement of a single rare species by two previously absent yet globally common species would represent an increase in biodiversity. The switch to a focus on wild species of conservation interest explicitly acknowledges the agency of humans in this decision and strips away the frequently adopted aura that such definitions are somehow environmentally determined or intrinsic in some non-human sense. However, a focus on such 'wild species of conservation interest' clarifies the question of who should be determining that list of relevant species and whether or not this is the appropriate focus of net gain compensation. At least two alternative constituencies deserve consideration: those who live in the vicinity of some environmental loss (say those who live near to a new housing development); and wider society. Our view is that it is the latter group which should be the focus of net gain compensation. The reason for this is straightforward, while it might seem most appropriate to compensate those in the immediate vicinity of losses, it is very unlikely that the funds made available for compensation will be best spent in that location. For one reason, by definition this will be an area subject to recent, often severe, environmental disturbance. Setting aside other environmental benefits, compensation here is less likely to be effective in terms of wild species conservation. Secondly, it is always likely that there are other far better locations where the positive effects of compensation funds could be far more effective in terms of the environmental net gains delivered; this is particularly the case when we consider the impacts of compensation upon wild species of conservation interest. We recognise that local political pressures will mitigate in favour of local action but given our arguments we would suggest that at most there should be a division of compensation between local and (more effective) nationally targeted schemes. In summary then we identify three rationales for environmental compensation targeting: enhancing wild species of conservation interest; local compensation; national conservation. Pragmatic combinations of all three are, of course, also possible.
- **Benefits and costs:** A key question concerns the adequacy of any net environmental gain compensation scheme. Basic economic theory provides straightforward guidance here: compensation for any loss is only adequate when it makes those concerned just indifferent between the loss going ahead with the compensation being paid, or the loss not occurring (and of course compensation not being paid). If those concerned are keen for the loss to go ahead then compensation is too high. If, on the other hand those concerned would prefer not to have the loss plus compensation then that compensation is inadequate (Johansson, 1991). In respect of environmental benefits and costs it is clear that the latter case dominates the former in real world planning and development cases. A practical problem arises concerning the assessment of the adequacy of net gain compensation. A basic requirement is that the benefits and costs generated by development and compensation are assessed and quantified. However, even then assessment of the adequacy of compensation is not straightforward because the diversity of environmental impacts (discussed above) involves a similar diversity in measurement units. Trade-offs become difficult: How many tonnes of greenhouse gas removal balance a number of recreational visits? How much money should be spent on compensation? This problem of 'commensurability' has been the subject of very extensive

research with methods being developed to directly equate the value of these benefits to the costs they incur all assessed within economic units (NCC, 2017). This acknowledges the reality that, every time a decision is made to say provide a certain environmental improvement at a specified cost, economic values are being implicitly placed upon those benefits. Such valuation is unavoidable and the essence of decision making; it is better to acknowledge this and make these values explicit than to hide them behind decisions made through implicit, unchallenged values. Compensation schemes should seek to maximise the net environmental gain provided by available funds and indeed the scale of those funds should be determined through a combination of benefit-cost analysis and the adequate compensation principle.

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