

An Invitation to Shape the Nature of England

A response to the Natural Environment White Paper discussion document from Wildlife and Countryside Link

Link brings together over 30 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members manage over 690,000 hectares of land, collectively employ 10,000 full time staff, and have the help of 170,000 volunteers and the support of over 8 million people in the UK.

This response is supported by the following 32 organisations;

- Amphibian and Reptile Conservation
- Association of Rivers Trusts
- Badger Trust
- Bat Conservation Trust
- British Mountaineering Council
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign for National Parks
- Campaign to Protect Rural England
- Campaign Whale
- Council for British Archaeology
- Environmental Investigation Agency
- Friends of the Earth England
- The Grasslands Trust
- Hawk and Owl Trust
- Institute for European and Environmental Policy
- International Fund for Animal Welfare
- The Mammal Society
- National Trust
- Open Spaces Society
- People's Trust for Endangered Species
- Plantlife
- Pond Conservation
- Ramblers
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- Shark Trust
- Whale and Dolphin Conservation Society
- Wildfowl & Wetlands Trust
- The Wildlife Trusts
- Woodland Trust
- WWF – UK

Link's members give guidance and advice to businesses, farmers, local authorities and communities and help people from all ages and backgrounds to engage with the natural environment. Across England, we routinely contribute actively to public sector delivery and therefore recognise the successes and failures of the existing systems – our recommendations in this response are based on this experience and the expertise of our

staff, volunteers and supporters. Internationally, Link's members also understand the linkages between UK and overseas policy and the state of the wider environment.

We would like to begin by saying how pleased we are that Defra has made the production of a White Paper on the natural environment such a clear and early priority, and we were encouraged by the broad scope of the discussion document. This response sets out our ongoing commitment to the natural environment, the outcomes we seek from the White Paper process and an indication of the roles we could play to deliver our collective ambitions within the next decade, as a direct result of the publication of a Natural Environment White Paper. We hope and expect that the recommendations of Sir John Lawton's recently published report *Making Space for Nature* will be taken forward by the White Paper. Link is using this response, in part, to outline how we believe this can be done.

We are pleased that the scope of the White Paper recognises the interconnectedness and breadth of the natural environment – ecosystems and their services, species, habitats and landscapes – and aims to integrate decision-making better to reflect this. We also recognise that as pressures on land increase, there is a growing need to address the complex interactions of competing land uses by taking a fresh look at how to maximise benefit and ensure we do not undermine our ecological security by exceeding environmental limits.

Our response focuses primarily on the terrestrial environment since we have only recently been through a detailed consultation process on how to improve legislative protection for our marine environment, culminating in the long-awaited UK Marine and Coastal Access Act. The swift and effective implementation of that legislation, together with the measures outlined in the EU Marine Strategy Framework Directive, will be essential if we are to achieve healthy, well-managed seas, where wildlife is flourishing and ecosystems are protected, connected and thriving. However, the general principles for wildlife protection which we refer to below are equally important at sea as they are on land.

1. Summary

Within a generation, we wish to see a resilient, healthy natural environment. To achieve this we urgently need a shared responsibility for delivery to be embedded across government, a clear understanding of the benefits of the restoration of England's natural environment and an integrated approach to achieving sustainable development¹. We wish to see habitat losses and species declines reversed, site condition further improved, and better delivery of a range of ecosystem services, through a more sustainable approach to the management of our land and water, the creation of a coherent network of wildlife-rich landscapes and seascapes and targeted projects to save our rarer species. We want people across England to enjoy, understand and value the natural environment, and to want to take action for it. Finally, we wish to see government policies to reduce the UK's impact upon, and to promote the protection of, global biodiversity.

Delivering these ambitions will require a transformational change from viewing the natural environment as a single issue (in its own 'silo') to a fundamental resource (natural capital) that has meaning across government and wider society, not simply for those with an interest in nature. Everyone will need to play their part, recognising that unless people can experience their natural environment they are unlikely to want to take action for it. Together we will need to:

¹ The UK Sustainable Development Strategy (2005) states that: "*We want to achieve our goals of living within environmental limits and a just society, and we will do it by means of a sustainable economy, good governance, and sound science.*" See APPENDIX for further explanation.

- ensure commitment to measurable outcomes for England's natural environment;
- secure and implement those policies and practices for protecting our natural environment that are already working well; and
- develop and implement new legislation, policies and practices to drive the widespread recovery of England's natural environment, and deliver sustainable development.

2. Why do we need a Natural Environment White Paper?

We have failed to meet the 2010 target to halt the loss of biodiversity. We now have a new EU 2020 target, which needs bold leadership and a step change in our response. It is clear that this target, and others (for example those set out under the Water Framework Directive (WFD)), demand more effective and innovative actions both at home and on the international stage. This is especially true given the ongoing increasing pressures on our natural environment from development, intensive land use and climate change.

It is important to look at why the 2010 target was missed and to ensure that the White Paper learns from and addresses these issues, especially as the 2020 target is even more ambitious. These lessons will also have significant implications for our ability to meet other natural environment commitments. The European Council of Ministers' conclusions on biodiversity post-2010 identified the following reasons for the failure to meet the 2010 target:

- Incomplete implementation of legislation;
- Incomplete and poor integration into sectoral policies;
- Insufficient scientific knowledge and data gaps;
- Insufficient funding;
- Lack of targeted instruments to tackle specific problems (e.g. non native species); and
- Shortcomings in communication and awareness.

Making Space for Nature contains 24 recommendations which need to be acted upon if we are to create a coherent and resilient ecological network to support England's wildlife and people. In addition, the National Ecosystem Assessment (NEA) will begin to reach its conclusion later this year. This will be the first attempt to show quantitatively how ecosystem services underpin our economy and well-being and will set a baseline for us to improve upon. It is likely to reinforce the findings of the international study on The Economics of Ecosystems and Biodiversity (TEEB), and show clearly that investment in the natural environment today is vital for society both now and in the future.

As we degrade and undermine the health of our natural environment we threaten the ecosystem services that it provides – such as flood alleviation, pollination, food production and carbon sequestration – with evidence of significant detrimental impacts on our economy and on the well-being of people and society. It is clear for example that we are over-exploiting and damaging our marine environment².

Through this ongoing degradation we also risk losing something that is more difficult to measure, but of equal importance – the inspiration provided by nature and contact with it. A diverse and thriving natural environment is worth striving for in its own right.

² UK-wide state of the seas report, *Charting Progress 2*

In a time of austerity, it may be tempting to cut back on environmental actions. But this will be a false economy. Environmental impacts are leading to socio-economic and cultural impacts and the costs of these will grow if we delay action. In short, the government must give as clear a message on ecological debt as it has on economic debt. In short, the government must act with as much resolution on ecological debt as it is on economic debt

There is still time to get things right for our natural environment if we act now. Previous generations have taken a stand and taken radical action to protect the natural environment, such as through the 1949 National Parks and Access to the Countryside Act. This Government has made a hugely welcome pledge to be the greenest ever, and the Natural Environment White Paper presents it with a great opportunity to make a significant step towards achieving that aspiration. We can, and must, be the generation that initiates the widespread recovery of England's natural environment before it is too late. We need to sustain our society, and meet our national and international obligations and aspirations on natural resource management, landscape protection and biodiversity protection. This requires us to encourage a turnaround in people's contact with and valuing of nature to foster a strong relationship that can sustain recovery into the future.

Action in and around the components of England's ecological network will not on its own be sufficient to restore our natural environment. Action must also be taken in the wider countryside and urban areas – a greater focus on ecosystem services and multi-functional land use will be vital. Raising the bar by considering a range of ecosystem services in our land management everywhere is an important goal, and some services will be more important in some places than in others. For example, flood alleviation will be a particular consideration in certain locations, and some areas of England naturally offer greater opportunities for carbon storage and sequestration than others. Moving from ideas to implementation on multi-functional land use will require better information and research, well-informed decision-making at all levels, and smart use of a complex range of delivery mechanisms.

Defra and the environment sector need to champion the restoration of England's natural environment as cost-effective when the benefits are viewed across budget lines, Government departments, and in the long-term (e.g. flood defence, water quality, pollination, nutrient cycling and preventative health). One of the major stumbling blocks to this is 'silo-based' funding streams – even within Defra and its agencies. Furthermore, any strategy to protect the natural environment will not succeed while other Government policies and departments practise unsustainable development which does not recognise environmental limits.³ Reform of the planning system, for example, has the potential to make or break our aspirations for the natural environment. The importance of cross-governmental working in preparing and implementing a strong Natural Environment White Paper cannot be overstated.

3. What a successful Natural Environment White Paper would include

Government must start by articulating a clear vision, and the aspirations which the White Paper will seek to achieve. These should be ambitious and focused on delivering measurable outcomes. Link believes that a new integrated statutory framework⁴ will be required to achieve these outcomes by bringing together existing and new mechanisms in a coherent way. We suggest below a number of the outcomes and the key components of the framework and principles that we believe need to be followed.

³ Clearer reference to the definition of Sustainable Development is needed through reiterating the five principles of SD as set out in the UK Sustainable Development Strategy (UKSDS), *Securing the Future* (2005).

⁴ Aichi Target from CBD which partners agreed to translate into national strategies and action plans
<https://www.cbd.int/nagoya/outcomes/>

3.1 Commitment to measurable outcomes

It is the end result that matters – the outcomes for the natural environment and people’s understanding and enjoyment of it. Ambitious and measurable outcomes that are properly monitored and reported upon will drive and inspire positive action toward a healthy natural environment in England, and will enable everyone involved to be sure that we are succeeding in meeting our national and international obligations and aspirations. Positive end results will engage people, and attract others to action to protect and enhance the natural environment because they will see demonstrable progress.

We propose below a number of key categories of measurable outcomes that should be included in the White Paper, with the precise measures and timetables to be agreed as part of the development of the integrated framework. We would expect the outcomes to be cross-governmental, as they are inter-related and need to drive more holistic and multi-functional land use. The categories provide an indication of the key outcomes Link believes should be developed. We look forward to working with the Government and other interested parties to develop specific long term commitments as the white paper evolves.

1. **No net loss of biodiversity:** It is important that the policy and regulatory framework established ensures that there will be, as a minimum, no net loss of biodiversity as a result of built development, forestry and agriculture. Where feasible, we should seek to achieve net gains, and ensure that current levels of biodiversity protection are maintained.
2. **A coherent and resilient ecological network:** This should be established based on the recommendations in *Making Space for Nature*, which would be measured by:
 - **Site condition:** e.g. 95 per cent of all SSSIs maintain their favourable or unfavourable recovering condition, with more than X per cent (to be determined) achieving favourable condition by 2015, with a higher outcome by 2020;
 - **Status of priority species;**
 - **Habitat quality and extent.**
3. **Improved provision of key ecosystem services**
 - **Improved water quality:** Determined by healthy freshwater ecosystems, and exceeding the objectives of the WFD by extending the number of small water bodies and an increased emphasis on wetlands.
 - **Carbon storage:** through protection and expansion of high carbon priority habitats, e.g. peatlands, native woodlands and grasslands.
 - **Pollination:** put more wild flowers and nesting areas back into the landscape to increase wild pollinator populations; support research and monitoring schemes to understand community dynamics and follow population trends
4. **People and nature**
 - E.g. every schoolchild in England will have the opportunity for at least one high quality learning activity based in the natural environment in each school year.
 - E.g. Definitive maps of rights of way will be up to date, all public paths open and usable, all access land accessible, and an English coastal path completed.
 - Outcomes related to the Standard for Accessible Natural Greenspace (ANGSt) and Woodland Access Standard (WAS).

3.2 Commitment to establish an integrated natural environment delivery framework

There is an extensive array of policies and mechanisms that determine how land and resources are used and managed, e.g. relating to water and flood risk management, agriculture, planning, minerals, woodland and forestry, landscapes and site and wildlife protection. We believe that other policies in areas such as public health, education, transport and employment should also contribute to sustainable land use.

As this shows, many policy areas are relevant to the natural environment. However, at present too few of them adequately take it into account. Much of the existing policy framework is fragmented and decisions are taken by a range of different bodies in isolation from each other. There are significant opportunities to achieve much greater overall benefit if these policies were more effectively aligned spatially and geographically. Link therefore believes that there is a need to embed environmental outcomes across government, and at all levels, to drive integration across policy areas to ensure coherence, cost-effectiveness and support effective local decision making, engagement and involvement to achieve measurable outcomes.

3.3 Existing policy areas or initiatives to be included in the new framework

We need to secure and strengthen the components of our nature conservation system that are working well. The recovery of our natural environment will *only* be possible if our successes in protecting the natural environment to date are secure.

In many cases, the policy or legislation underpinning action is sound, but its implementation falls far short of what is necessary. In these instances, we urge Government to ensure its delivery bodies fully implement the important building blocks of our healthy natural environment that already exist. In our answer to Question 3 we provide further details, but in summary the main components include:

- The Birds and Habitats Directives and associated national legislation;
- Protected sites, and the recent Public Service Agreement (PSA) target to improve SSSI condition;
- The Water Framework Directive;
- The Marine Strategy Framework Directive (MSFD);
- The UK Marine and Coastal Access Act;
- Protected landscapes;
- Species recovery projects for priority species;
- Agri-environment schemes, particularly the Higher Level Scheme, and cross-compliance;
- England's forestry strategy; and
- Planning protection for the natural environment.

3.4 Principles and components of an integrated delivery framework

Link has identified nine key principles and components for a successful integrated delivery framework, which we describe in turn below. These are:

- From segregation to integration;
- Strong leadership;
- Collaboration and strong relationships;

- Governance;
- Smart regulation;
- Advice and guidance;
- Incentives and resources;
- An active and engaged Big Society; and
- Monitoring.

3.4.1 From segregation to integration

The successful components of the current nature conservation system play a crucial role, as they have allowed us to ‘stop the rot’ and ‘protect the best’ in the areas where their protection extends. But on their own, these components have not been sufficient to secure the long term future of our natural environment and landscapes. We need to ‘restore the rest’, and we all have a role to play.

To address the root causes of environmental decline, the new framework also needs to go beyond those policy areas that are directly associated with managing natural assets. *Making Space for Nature* identifies many of the additional actions that need to be undertaken. Economic policy should foster development within environmental limits, and government decision-making should take place with consideration of the full value of the natural environment, both to people now and to future generations. For example, the value of the natural environment should be integrated into government policy appraisal, such as Social Cost Benefit Analysis, the Treasury’s Green Book and Impact Assessments, and we should ensure that all sectors play their part, with a focus on the polluter pays principle.

3.4.2 Strong leadership

The UK Government must show strong leadership both on the international stage and at home to achieve its commitment to be the ‘greenest Government ever’.

This leadership is required to create the right space for communities to self-organise, take action for the natural environment, adopt practices for sustainable resource use and embrace the principles of sustainable development. Government needs to ensure that the gains from doing this outweigh the costs.

Internationally, now that a Strategic Plan has been agreed through the Convention on Biological Diversity negotiations in Nagoya, the UK Government should set out a roadmap for achieving this at home and abroad. Government should also develop and advocate a strong Common Agricultural Policy (CAP) reform position which places the delivery of environmental public goods at its core. Early progress on this would help the Government when attention turns to the Rio +20 review in 2012.

Many aspects of delivery for the natural environment can be achieved locally, but government nationally will need to empower engagement and action at this level, by providing the right mechanisms and support.

The first step in providing strong leadership is to commit to measurable ecological outcomes, as outlined above. The next will involve ensuring accountability and adherence to agreed standards. Establishing standards can be achieved through national regulation and policy frameworks, for example protecting non-designated sites, through national planning policy, and by reinforcing the principles of sustainable development, including living within environmental limits.

Only government, at local and national levels (and across Whitehall), can re-write policy that causes damage to the natural environment or creates blockages to its restoration. Identifying these blockages is the first step, and this work should, we believe, be undertaken independently of government by an impartial body. We suggest that a small independent expert committee, similar to the present Committee on Climate Change, would be the most appropriate for this task. Implementing policy changes must then be an integrated government role, which could be achieved through a powerful cross-Cabinet committee.

Box 1: An independent Natural Environment Expert Committee

One potential mechanism by which the leadership provided by government could be improved would be to establish an independent panel of experts to drive progress toward the restoration of our natural environment. The establishment of such a committee would be a strong early indicator of the Government's commitment to the natural environment.

The panel, supported by a small secretariat, could advise Government departments where policy blockages or damaging policies need to be changed, and monitor progress toward the measurable outcomes. This panel's independence and cross-government remit could be strengthened by reporting either to the Cabinet Office or the Environmental Audit Committee.

Finally, the White Paper provides the Government with an excellent opportunity to take a long-term view. The last Natural Environment White Paper was published 20 years ago, so Ministers can afford to take a long view, looking beyond the five year electoral cycle and the current economic difficulties. Although some benefits of action will be more immediate than this, the natural environment will deliver a full range of benefits over a longer time frame, so policy should be considered in this context.

Link believes that these key examples of leadership should also be reflected in the review of the England Biodiversity Strategy⁵.

Strong leadership is predominantly a role for Government, although with clear support from civil society.

3.4.3 Collaboration and strong relationships

Collaboration and strong relationships have been at the heart of successful delivery of nature conservation at a site and landscape scale to date (see case study below). Link believes that a greater focus on landscape-scale conservation would provide a strong basis for collaboration. By working together within a large defined area, a range of stakeholders can come together and consider all possible mechanisms for delivery.

⁵ http://www.wcl.org.uk/docs/EBS_10_points_Oct10.pdf

Case study: Oxfordshire Nature Conservation Forum (ONCF)

Oxfordshire has the only independent nature conservation forum in the country, which has been promoting partnership working in the county for over twenty years. ONCF has over forty member organisations, ranging from local authorities and farming bodies to small community-based local environmental groups and leading NGOs.

Oxfordshire tested the first targeted approach to delivering biodiversity enhancement through the Conservation Target Area (CTA) approach. This has since been rolled-out across south-eastern England, re-named as Biodiversity Opportunity Areas. This integrated approach, with the County Biodiversity Project Manager working closely with key partners, delivers appropriate habitats in appropriate locations.

Fundamental to the success of the partnership is the fact that, up to now, funding has been secured for a small, core team of staff to drive forward and coordinate the work of partners, for example by:

- Funding a part-time Biodiversity Action Plan Officer to provide advice to land managers in CTAs where individual ONCF partners cannot;
- Funding a part-time Community Officer to advise Parish Councils on ways they can deliver their duty to have regard to biodiversity under the NERC Act, and to help local community groups access funding through local grants;
- Running recruitment and training events for new biodiversity ‘recorders’, essential to ensure the long term future of wildlife monitoring by volunteers, itself critical to our collective ability to measure enhancements to or loss of wildlife;
- Running workshops (e.g. on key issues raised by this Natural Environment White Paper), events (“*Oxfordshire Goes Wild*” in 2010 attracted 4,300 people to find out about the work of 20 different nature conservation partners in the county) and coordinating communications (a weekly e-bulletin goes directly to 1,300 contacts and indirectly to many hundreds more; 1,000 copies of a biannual newsletter are distributed to environmental and community groups all over Oxfordshire).

This is predominantly a role for civil society, with government enabling communities to deliver by providing the right policy and funding backdrop and removing blockages and perverse subsidies.

3.4.4 Governance

Despite its significance, the governance of England’s natural environment is often overlooked. Several recent studies, including *Making Space for Nature* and the Adaptation Sub-Committee’s first report on the UK’s preparedness for climate change, have highlighted the importance of strategic spatial planning at a sub-national level for the natural environment.

Link therefore suggests that some form of strategic spatial overview for the natural environment should be incorporated within the Natural Environment White Paper, linking to the reformed planning system. In this context, we urge Defra and CLG to work closely together to ensure that the Natural Environment White Paper and the planning reform agenda are developed together, in an integrated way. A possible model is outlined in box 3 below.

Box 3: Local Natural Environment Recovery Groups

Restoration of the natural environment needs to take place throughout England, with the nature of it varying from place to place. *Making Space for Nature* recognised that ecological networks will extend beyond a single local authority’s boundaries, and indeed beyond

existing landscape-scale projects, and suggested that National Character Areas (NCAs) provide a good spatial basis for planning the restoration of the natural environment. Link agrees with Lawton that some form of sub-national spatial overview of natural environment delivery is required – NCAs offer one such option and river catchments another.

Focussing within natural, or ecological, boundaries would be a major advantage in planning and implementing delivery of a healthy natural environment. A range of partners would need to come together to identify ecological networks and areas for restoration based on an understanding of the natural environment and specific related issues in the area e.g. water quality or flood risk. Partners could include NGOs, statutory agencies, local landowners, utility companies, Local Economic Partnerships, local businesses and local record centres. These groups could be a means of achieving recommendation 1 of *Making Space for Nature*.

Local, or sub-national, decision-making will be based on a collective understanding and knowledge of the area in question. Groups would draw together key local data sets to set objectives and identify local solutions to particular issues. To support this process, government should make available national data on, for example, species and habitat trends and hotspots or other physical or biological features that would support local decision-making.

Any local or sub-national governance structures must be set within the context of a strong national framework as described above. In particular, the White Paper should also restate the Government's commitment to sustainable development and to a national strategy for achieving this, and refresh those aspects of wider sustainable development policy and strategy that deal with the natural environment. This will be particularly important in view of the Government's intention for sustainable development to be an underpinning objective for planning reform.

Only government can establish governance, with civil society then engaging to deliver within the framework at all spatial scales.

3.4.5 Smart Regulation

Regulation has sometimes received a bad press in recent years. Certainly, as recognised in *Making Space for Nature*, regulation must be sensible, and applied fairly and evenly across industries. As the Natural Environment White Paper is prepared, we urge the Government to remember that not all regulation is bad regulation, a point we know Defra has recognised elsewhere through the current review of farming regulations being led by Richard Macdonald. In fact, 'green tape' which protects precious natural resources can provide one of the most cost-effective means of safeguarding the natural environment, which will be particularly important in the face of budget cuts.

Regulation is vital where voluntary measures have not proven as effective as necessary. For example, in order to ensure the success of targeted voluntary action on diffuse pollution and meet the requirements of the WFD, Water Protection Zones should be introduced in those areas where voluntary and supportive measures have not proved successful by 2011.

Only government can establish and in most cases enforce regulation to safeguard the natural environment, on behalf of the civil society.

3.4.6 Advice and guidance

Good advice and guidance can make or break effective delivery for the natural environment. *Making Space for Nature*, for example, recognises how important readily available, high-

quality advice is for establishing long-term delivery by landowners. Good guidance can provide important support for planners, foresters and land owners and managers who are working within a complex policy and delivery environment. Providing good examples of where the natural environment provides economically attractive outcomes could help to address the current bias towards engineering solutions rather than natural processes, e.g. in flood risk management.

In the past, advice has appeared to be a low priority for governments. For example, the UK Government seemed previously reluctant to provide funding for the deployment of the technical advice facility of the CAP. Link members already provide a wide range of advice to farmers, landowners, businesses and the public, and this could be further developed and targeted, based around areas identified through the mechanisms above. For example, the South West Farmland Birds Initiative is working to improve habitat for birds and arable plants⁶. As individual NGOs we recognise that we could also do more to work together to provide joint advice alongside Government agency advisers, particularly to landowners, and this is something we will focus on in the future.

Government and civil society can work together to provide this function.

3.4.7 Incentives and resources

Link members are fully aware of the current economic climate and the measures being taken to address the country's deficit. We remain concerned about the overall impact of cuts outlined in the Comprehensive Spending Review on the statutory conservation agencies, local authorities and on our own organisations in the short to medium term, although we believe that it is now important to look forward in considering how to make the best of the resources available.

Making Space for Nature highlights the importance of secure funding sources for successful natural environment delivery. We are delighted that, despite significant cuts to Defra's budget, Environmental Stewardship has been prioritised, with funding for the Higher Level Scheme increasing, as this is vital to the future of England's natural environment.

There are other, existing funding sources that have enabled numerous successful nature conservation projects. Many of these are funded by industry taxes, such as the Aggregates Levy Sustainability Fund and Landfill Communities Fund, and represent important positive returns for taxed industries. These funding pots are relatively small amounts of money and yet allow NGOs to access significant sums from elsewhere which mean they are able to inspire, catalyse and enable delivery by others.

However, the funding we have had to date has been insufficient to reverse the decline in the natural environment, and we recognise that public spending is restricted. It is therefore extremely important that new sources of funding are generated, and current resources used to better effect. Approaches to funding delivery that recognise the multiple benefits provided by the natural environment will allow us to restore it over much larger areas than before. Civil society and the private sector cannot achieve this alone – in each of the examples below there is a central enabling role for Government:

- Reviewing CAP implementation to: integrate schemes and combine agriculture and forestry; score most highly those measures in schemes that deliver greatest environmental gain rather than the bare minimum; extend and enforce Good

⁶ The South West Farmland Bird Initiative is funded and supported by Natural England, Defra, RSPB, FWAG, Cotswolds Conservation Board, North Wessex Downs AONB, Cranborne Chase and West Wiltshire Downs AONB, Dorset AONB, Dorset Biodiversity Partnership, Game & Wildlife Conservation Trust, National Farmers Union, Plantlife International, The Wildlife Trusts, National Trust and Defence Estates

Agricultural and Environmental Condition (GAEC) and apply it to all land management, not just farming; and allocate a greater proportion of resources to promotion of schemes and proactive advice;

- Environmental taxes on peat, fertiliser and pesticide use, which have the potential to help address damage to biodiversity and natural resource degradation, whilst raising much needed revenue;
- Enabling water companies to develop green tariffs that protect vulnerable consumers while penalising waste;
- Enabling implementation of biodiversity offset systems (used only for significant negative residual impacts on biodiversity after appropriate avoidance and mitigation measures have been taken). A level playing-field should be created so that equivalent and effective standards apply to all offset types (developer responsible, banking and fees in lieu), with the aim being to secure no net loss of biodiversity as a minimum, with a preference for net gain;
- Using the Green Investment Bank to provide long-term non-commercial loans and grants that stimulate activities that enhance delivery of ecosystem services, such as use of native trees and woodland to alleviate flooding, enhance water quality or reduce the urban heat island effect;
- Providing tax breaks for companies and land managers that invest in sustainable land management, linked to recommendation 20 of *Making Space for Nature*; and
- Establishing privately financed payments for ecosystem service schemes, the importance of which was recognised in recommendation 17 of *Making Space for Nature*. The promise for new schemes is greatest in water quality management – outside of this area the potential remains limited.

Arguably, many of the measures we already have in place to protect the natural environment either deliberately take decisions out of the market place, or view it as a clear public good that can only be funded through the public purse. These approaches are still valid today. Our protected areas and landscapes, for example, are protected against damaging land use change through non-market mechanisms such as the planning system. Whilst these measures were established before the economic benefits of the natural environment were well understood, this approach is extremely relevant today, as the existence, aesthetic, cultural and scientific value of these places outstrips the price placed on them by private markets.

Case study: Working Wetlands - a partnership of farmers, industry and conservation

The Devon Wildlife Trust's Working Wetlands project is a 7 year Living Landscape initiative established in 2008 and working in the Culm National Character Area of northern Devon. Working Wetlands, along with West Country Rivers Trust, has recently joined forces with South West Water (SWW). As part of the water industry's 2009 Periodic Review, Ofwat agreed that SWW and other water companies could invest in land and assets outside their ownership. Between 2010 and 2015 SWW will invest almost £9m in their *Upstream Thinking* initiative, which aims to provide clean water through helping landowners choose farming methods which enhance water quality while also protecting natural resources and improving the quality of wildlife habitats. SWW has calculated that the benefit-to-cost ratio of *Upstream Thinking* is over 65:1. By investing in schemes to develop cleaner, more reliable water supplies the company can reduce costly and energy-intensive water treatment projects.

In just two years, Working Wetlands has worked with farmers to bring over 700 hectares of Culm grasslands into recovering or favourable condition. The project is creating a Living Landscape whilst also providing a financial life-line for farmers and a cost effective means of improving water quality.

Only government can give the right signals to develop major new funding streams or direct smarter use of the public purse, which will remain important. Civil society has a role to play in generating some important resources e.g. NGO membership, volunteers and local knowledge.

3.4.8 An active and engaged Big Society

The forthcoming Localism Bill offers an opportunity to empower neighbourhoods through a proposed new level of local planning, and the proposed National Planning Policy Framework is a chance to embed a national framework for the natural environment within policy-making, with a view to establishing an ecological network. Link believes that it is important that ecological networks should be recognised in national planning policy, and identified and protected within local plans as recommended by Lawton (Recommendation 1).

We should build on schemes that already exist, such as those in the box below, to help people to understand the natural environment in their local area, and how they can improve it. Education and organisation are key to allowing people to understand what action they can most productively take, whether this is through volunteering at a local wildlife site, working to create new habitats or being a voice for nature in local decision-making.

Case study: Engaging civil society

In an effort to connect people with the nature around them, the RSPB meets approximately 2.5 million people on its network of reserves and through its programme of Date with Nature projects across the UK. It aims to showcase the natural world to as many people as possible, at a time when more and more are disconnected from it.

The RSPB also runs two mass participation 'Citizen Science' projects: the Big Garden Birdwatch/Big Schools Birdwatch, and Make Your Nature Count. These two activities are accessible to people across the UK and from all walks of life, as they focus on the nature on people's doorstep by encouraging people to watch, count and record the wildlife in their garden or local park. A total of 627,000 people got involved with these projects in 2010.

Civil society has an important role to play in delivering a restored natural environment within an enabling framework established by government, such as that set out above.

3.4.9 Monitoring

Monitoring and evaluation are critical to assess whether measures (such as agri-environment schemes) are delivering against their objectives. Key to this is the need for measurable ecological outcomes against which monitoring can take place. The results obtained from monitoring work help to demonstrate to the taxpayer that their money is helping to deliver a range of environmental goods and services of wider benefit to the public. The evidence gathered is also critical to feed into regular reviews and subsequent changes in the design of measures. We must make best use of the data that we already get from our existing networks, as well as identifying the key areas where we need further resources.

Link believes that to determine whether schemes and money are actually delivering what they should be, there is a need for improvements to evidence collection, monitoring and assessment, particularly in relation to the delivery of ecological outcomes.

We seek implementation in England of the recommendations in the UK Terrestrial Biodiversity Surveillance Strategy as published by JNCC⁷.

This can be a joint civil society and government venture – species monitoring is already a great Big Society model – but more coordinated effort on habitat monitoring is required and this will need strong government input.

4. Conclusion

The restoration of our natural environment, and through it the recovery of habitats, species, landscapes and ecosystem services and subsequent improvement in measures and quality of life, should define the next era of land, sea and resource use in England. Link believes that the mechanisms and principles above should form the foundations of the future approach, and we will provide in our answers to the questions in the discussion document a number of specific points which will give further clarity to these messages.

⁷ <http://www.jncc.gov.uk/PDF/SurveillanceStrategyLeaflet.pdf>

Answers to discussion document questions from Wildlife and Countryside Link

Question 1: What do we need to do to embed the true value of our natural resources in decision making at all levels?

The overall aim of the White Paper should be to ensure we have a resilient, well-functioning and ecologically healthy natural environment, of value in its own right, but also because it enhances the provision of ecosystem services on which we all depend.

The White Paper provides a major opportunity to embed the natural environment within decision-making and implement the recommendations from *Making Space for Nature*. However, this will require local support, engagement and action. Link believes that the White Paper should set out a clear ambition as to how, at the local level, individuals, communities, local authorities, landowners, businesses and the voluntary sector, amongst others, can be engaged and involved in decision-making.

An important way to embed the value of natural resources across government would be to agree and commit to a range of measurable outcomes (see p5 Section 3.1), as these will drive and inspire positive action towards a healthy natural environment. Link believes that to achieve these outcomes we will require a new statutory national spatial and strategic framework to ensure integrated decision-making across policy areas and Government departments in relation to land use and land management. We have suggested above a number of the outcomes and the key principles of the framework that we believe need to be followed. In our answer to Question 4 we have outlined in more detail the components of the framework and the approach required to deliver it.

Government also needs to recognise values such as enjoyment and improved well-being that are less easy to measure but are immensely important to people and have enormous value to society. The tranquillity, wildness and cultural heritage of our landscape are values that must be taken into consideration when making decisions about the natural environment, particularly around planning and economic growth.

a. How can we reflect all the different kinds of value described above?

Despite their success in protecting many of our most important wildlife sites and best landscapes, our existing approaches to protecting the natural environment have been unable to stem widespread damage to it in the wider countryside. There are many strong arguments why embedding the monetary value of a wide range of ecosystem services in decision-making at all levels could help to address this. However, many of the existing approaches to valuing ecosystem services are, in Link's view, inadequate. We therefore urgently need to improve our scientific understanding through publicly funded research. Outstanding requirements include:

- Understanding dependencies between ecosystem services and biodiversity;
- Developing a better understanding of how ecosystems provide services;
- Developing tools to measure and extrapolate service provision better, to facilitate more robust monitoring of state and trends in services provision;
- Developing tools for transferring estimates of service provision to alternative locations or times; and
- Continuing to define environmental limits and how they can be integrated into policies and decision-making.

Other mechanisms for reflecting the value of the natural environment in policy and decision-making include:

- **Local decision-making**

Government departments should ensure all types of value associated with the natural environment are understood in local decision-making, as decision-makers at the local level may often find it difficult to juggle a wide range of responsibilities alongside those relating to the environment. An enabling national framework that allows information to flow to the local level could help realise the potential benefits of localism.

- **Delivery of public goods and services in the wider countryside**

Covering over 70% of England's land surface, agriculture plays a vital role in the delivery of ecosystem services. Whilst a market exists for services like food provision, agriculture is also capable of producing 'public goods' for which there is no conventional market. However, it is also responsible for environmental and economic costs such as diffuse pollution; the latter is ultimately paid for by water customers. Securing and improving the provision of positive non-marketable goods and services can help address these externalised environmental costs and should be a focus for Government intervention.

The means by which these non-marketable goods can be secured on farmland are two-fold: firstly there is a need to ensure all land managers follow a 'do no harm' approach to the natural environment by adhering to a robust environmental baseline which is adequately implemented, monitored and enforced, for example, through cross compliance. This approach must also ensure that the 'polluter pays' principle is fully incorporated into expectations placed on the farming and land management sectors.

A baseline, however well implemented, can only achieve basic environmental protection and there is a further need to ensure that those who deliver above and beyond the environmental baseline are rewarded for doing so. Here the role of well-designed and implemented agri-environment schemes is critical, and the Government must ensure there is adequate funding available for schemes to operate across England. By taking action to restore, improve and protect the natural environment, these schemes will help ensure the natural resources upon which we all depend are safeguarded into the future.

- **Producer & consumer responsibility**

Link believes there should be a much greater emphasis on polluter responsibility. The cost of dealing with chronic or unattributed pollution is generally borne by taxpayers or water customers irrespective of the individual choices they make about the products and services they consume. So, as well as shifting the emphasis on water pollution *upstream* we could also shift the financing of mitigation *upstream* to the manufacturers and distributors of products which pose a threat to the natural environment. Disincentives work too, and can be more cost-effective. We need the Government and local authorities to administer a system of enforcement and fines that reflect the true environmental cost of pollution to ensure that individuals and companies invest enough effort and care.

- **Fixing funding blockages**

There are a number of funding structures in place that mean decisions that are environmentally beneficial and sustainable are often less profitable. Positive policy changes will have no effect unless blockages in these funding mechanisms are addressed. For example, the water price review offers an important source of funding to address water quality problems at source. However, as currently structured, water companies benefit more from building water treatment works than they do from working with farmers to improve land management, limiting opportunities to focus these funds on approaches that work with the natural environment. In addition, High Nature Value farming systems receive very low levels

of support through the CAP due to their extensive management practices, despite their delivery of often outstanding levels of public goods and increasing economic marginalisation.

Question 2: Have we identified the right overarching challenges for the White Paper to consider?

- a. *If not, what should we focus on?*
- b. *How should we approach these challenges?*

The challenges identified within the White Paper discussion document, especially climate change, are critical.

- **Climate change**

The impacts of climate change on the natural environment are already apparent, with shifts in appropriate climatic conditions for particular ecosystems and species the most visible. With many species and habitats already in poor conservation status, semi-natural habitats scarce and highly fragmented, and physical barriers such as roads and cities, the natural environment will require our concerted support if it is to adapt successfully.

The natural environment also has an important role to play in helping us to adapt to climate change, for example by using natural processes to reduce flood risk, and in mitigating climate change, for example by protecting and ensuring healthy marine ecosystems, as well as restoring soils and peatlands to store and sequester carbon and through benefits of sustainable woodland management and investment in wood fuel infrastructure. The natural environment should be acknowledged and promoted as a key climate change solution.

The integrated framework and approach described above provide the means of planning for and maximising the role of the natural environment in climate change adaptation and mitigation.

- **Land use change and competing land uses**

It is well documented that land use change and subsequent habitat loss are major drivers of biodiversity and ecosystem service decline⁸. Supporting more sustainable land use should be a major overarching challenge for the White Paper to consider, and the discussion document does not currently pick up adequately on competition for land use. This is particularly relevant in the context of the climate change agenda. The global food security debate is also refocusing many observers' attention on the productive capacity of England's farmland. It is critical that competing demands on land do not result in further degradation of the natural resource base and biodiversity. Our food and resource security depends on environmental security.

It is also extremely important that where demands on land are politically driven (including targets for renewable energy and global food security) these are robustly analysed and, if found to be lacking in sound justification, rejected as inappropriate

- **Budget cuts**

Whilst Link recognises the urgent and pressing need to reduce the deficit, it is important that Ministers realise that restricting or eliminating sources of public funds for the natural environment poses a major threat. As we identify above, the roles of both central and local government in setting priorities, in regulation and in investment in large-scale research remain critically important. Further damage done over the coming years will have a lasting

⁸ State of the Natural Environment <http://www.naturalengland.org.uk/publications/sona/default.aspx>

impact. For example, a lack of funds to protect vulnerable species may see their populations decline to a level from which they never recover.

- **Freedom to enjoy and understand the natural environment**

Environmentally-based challenges should be set alongside the challenge of the public's 'freedom to enjoy and understand the natural environment'. The White Paper contains little sense of celebration of what we have in the natural landscape of England. For people to appreciate, understand and take actions that will protect and enhance the environment, they must be able to access and enjoy it. Supporting engagement and enjoyment of the natural environment must therefore be recognised.

- **Additional consideration under incremental impacts**

Incremental impacts have also had a profound cumulative effect on human contact with nature. The gradual decline of England's natural environment and people's access to it mean that few people realise just how rich and beautiful it has been in living memory – this is the phenomenon of the shifting baseline.

We should also note that current conservation priorities as identified through the BAP process exclude a large number of species which suffered historic declines (i.e. prior to 1980, which was the starting point for measuring declines in the 2005 BAP review) and so do not appear within the Section 41 list. We must not downplay the true state of the natural environment, but rather embrace the full potential of a new focus on ecological restoration.

Question 3: What are the existing policies and practices aimed at protecting England's natural assets (including but not limited to those set out above on our biodiversity, seas, water bodies, air and soil) that currently work most effectively?

As referred to in the summary above, Link believes that we need to secure and strengthen the components of our nature conservation system that are working well. In many cases, the policy or legislation underpinning action is sound, but its implementation falls far short of what is necessary. In these cases, we urge the Government to ensure its delivery bodies fully implement these important building blocks of our healthy natural environment. We provide further details below.

- **The Birds and Habitats Directives and associated national legislation**

Positive implementation of the species protection and habitat protection and management provisions of the Birds and Habitats Directives is at the heart of meeting the EU 2020 target to halt biodiversity loss. Whilst the UK has now successfully designated or at least identified a network of Natura 2000 sites to meet its obligations for most habitats and species under these two core Directives, there are still some species that are not yet properly represented, and the marine part of the network is far from complete. Furthermore, whilst significant progress has been made towards improving terrestrial site condition, implementation of necessary management measures to maintain the few existing marine sites in favourable conservation status has been poor. Finally, implementation of wider measures, such as habitat restoration and creation, to enhance the coherence of the Natura 2000 network and conserve species in the wider environment have been viewed as discretionary, whilst in fact they are clearly necessary to meet the overall objectives of the Directives. Implementing the steps set out below, and in the *Making Space for Nature* review, would not only take us toward a healthy natural environment, but also help us meet our legal obligations.

- **Protected sites, and the recent PSA target to improve SSSI condition**

Linked to the Birds and Habitats Directives above, *Making Space for Nature* acknowledged not only that the scale of biodiversity losses would have been much greater without the existence of protected sites, but that our existing suite of protected areas, in favourable condition, must be at the heart of the resilient and coherent ecological network we need to

help the natural environment face future challenges (Lawton recommendation 2). This network will be central to delivering the Birds and Habitats Directive aims of restoring and maintaining species and habitats at a favourable status. The representative rather than comprehensive coverage of the SSSI series makes it all the more important that under-represented species groups and habitats are protected in other ways. Although we understand the negative consequences of poorly thought out targets, the PSA target for SSSIs has been one of the most significant drivers for nature conservation action, proving that an objective is needed if actions are to be successful, whether through targets or other smarter mechanisms such as efficiency indicators.

- **The Water Framework Directive**

This important European Directive has the potential to integrate the way we manage water and land to make it more sustainable in the long term and provide benefits to water customers, water companies and farmers. However, with current implementation, unsustainable management practices are not being addressed and water quality continues to be poor. The Environment Agency must increase the ambition of River Basin Management Plans and implement measures on a catchment scale if we are to secure a sustainable future for water and land management. In particular, implementation in England must introduce mechanisms to address effectively *all* of the freshwater environment, particularly the smaller waters which are currently ignored.

- **The Marine Strategy Framework Directive (MSFD)**

The Directive requires that we achieve Good Environmental Status (GES) for all UK waters by 2020. The preparation of Marine Plans and the designation of Marine Protected Areas are fundamental components of achieving GES. Using the MSFD as a strong lever in reform of the Common Fisheries Policy is also crucial to enabling recovery of our marine environment.

- **The UK Marine and Coastal Access Act**

This Act sets out a strong and sound legal basis for the protection and recovery of our important, but much-neglected, marine environment, and at the same time provides for a new right of access to the coast, giving people the opportunity to enjoy the natural environment. It now requires political will and investment to implement it fully and effectively. Particular priority must be given to the designation of Marine Conservation Zones to contribute to a UK ecologically coherent network of Marine Protected Areas and the implementation of an ecosystem-based approach to marine planning that protects marine resources and ensures space for marine wildlife.

- **Protected landscapes**

Our National Parks and Areas of Outstanding Natural Beauty (AONBs) have succeeded in protecting much-loved and valued landscapes since their establishment. Countryside Quality Counts data shows that the traditional character (including the natural as well as historic environment) of these areas has been generally maintained or enhanced. It is also relevant to the Government's agenda of localism that these landscapes, while nationally designated, have in recent years taken on an increasing focus in supporting local communities and economic activity. They attract many tourists, who spend money in often remote rural economies. However, the benefits for wildlife in these protected landscapes have to date not been maximised – species declines are known to be equal for at least some species groups within and outside these areas. Therefore Link strongly supports the point made by Lawton that National Parks and AONBs should become 'exemplars of coherent and resilient ecological networks' for the benefit of both people and wildlife. The Government must continue to protect our best landscapes, and look to expand the network.

- **Species protection legislation**

Underlying species protection in the Wildlife & Countryside Act (WCA) and EU Nature Directives remains an important mechanism for nature conservation. However, we must

recognise that there are limitations associated with the way these measures have been implemented in this country. For example, the current process of reviewing WCA species protection through Quinquennial Reviews (QQRs) is bureaucratically complex (the last two reviews have yet to be implemented and the next is almost upon us) and does not fully recognise the full potential which species protection affords (e.g. protection for vascular plants is still formally linked to collection which is no longer a great threat). Equally there are gaps in the species protection legislation such as the lack of protection for the places where non-animal groups live.

- **Targeted Species recovery projects**

Some of the most significant successes of the UK BAP have been the achievements of targeted species recovery projects for priority species. The combination of SMART biological targets, priority status and the identification of species Lead Partners (to encourage and coordinate action), has helped turn around the populations of several BAP species including cirl bunting, stone-curlew, large blue butterfly and ladybird spider. The nature of recovery projects varies between different species, but in many cases has involved the use of project staff to work specifically with farmers or land managers at a local level, e.g. through the provision of advice, help with funding applications or direct ‘hands-on’ conservation activity. Numerical targets and priority status have also been of great value to funding bodies to ensure that limited resources are targeted to good effect. In addition, species-focused work can provide the inspiration and drive for habitat restoration and re-creation, e.g. in the case of bitterns and reedbeds.

- **Agri-environment schemes, particularly the Higher Level Scheme, and cross-compliance**

England’s Higher Level Stewardship (HLS) scheme is amongst the best in Europe, and it is fundamental to nature conservation success here, for example in underpinning the condition of our SSSI (and Natura 2000) network (Lawton recommendation 15). Our Entry Level Stewardship (ELS) scheme has great potential, but needs a greater focus on delivering the right outcomes. Properly targeted, it can contribute to halting and reversing declines in species associated with the farmed landscape. Cross-compliance, the suite of primarily environmental requirements placed on farmers in receipt of direct payments and agri-environment support from the CAP, has the potential to secure a basic level of good land management practices across farmland in England. Whilst implementation in England is relatively robust compared to many other EU Member States, there is still a need for improvements in the scope of requirements, monitoring and enforcement.

- **England’s forestry strategy**

Link supports the Forestry Commission’s policies on restoring ancient woodland sites planted with conifers (PAWS) and restoration of inappropriately planted open ground habitats. We also emphasise the need for an increase in the area of native trees and woodland and an increase in woodland management to stem the loss of woodland biodiversity.

- **Planning protection for the natural environment**

Planning regulations and the suite of Planning Policy Statements within the existing planning system contain important policies for the protection and enhancement of the natural environment. These include protection for designated and non-designated wildlife sites (relevant to Lawton recommendation 2), identification of opportunities for habitat re-creation, protection of the Green Belt and nationally designated landscapes, and protection of much-loved open green space for community use. These will be reviewed during the development of the new National Planning Framework, and we believe these policies should be retained. In addition to policy, planning conditions and obligations provide useful mechanisms for including the provision of green infrastructure within developments and urban landscapes. They allow for consideration of what green infrastructure is needed and the opportunities

that exist to provide it, and the process requires developers to have an active role in contributing to the local environment. Another important aspect of planning control for the natural environment is the Hedgerows Regulations, one of the few pieces of legislation anywhere in the world specifically directed to creating the kind of natural network that is now so widely seen as being desirable.⁹

- **The water industry price review**

Although far from perfect (for example it incentivises end of pipe infrastructure instead of more sustainable land management) the price review sets out a clear process by which improvements and investigations are evaluated and funded. The recent water price review (PR09) saw in a very welcome shift in thinking towards support for more sustainable, catchment scale investigations and permission for water companies to invest in land they do not own to achieve water quality benefits. Other sectors would benefit from a similar process, as it provides a framework and clear timescales under which to operate. Link suggests that Price Reviews should look to work over longer timescales in line with other processes such as Catchment Abstraction Management Strategies (CAMS) or the WFD, to help deliver multiple benefits.

- **Sustainable Use Directive for Crop protection products**

With proper implementation, this Directive could be highly effective at reducing pesticide pollution in water, with huge economic savings for water companies. To facilitate this, statutory and voluntary measures to control pesticide pollution should be devised, including statutory safeguard zones and catchment-based approvals for high risk pesticides.

- **Environmental Assessments**

There are currently various statutory environmental assessment processes which play an important role in elevating environmental considerations into decision-making. Environmental assessments help identify and evaluate potential impacts on the environment so that policies or projects can, if necessary, be modified accordingly. Effective assessments can present a wide range of long-term benefits, including providing a framework within which more strategic participation of the public and stakeholders can take place, as well as opportunities for learning and exchange of knowledge among stakeholders and participants.

Link strongly believes that environmental assessments must remain a central element of decision-making that impacts upon the environment. However, there could be some improvement in the processes, including earlier engagement of the public and key stakeholders, better guidance and practice in defining and assessing alternatives, and undertaking assessments earlier in a process (such as applying Strategic Environmental Assessments to policy) so that environmental considerations are considered at the same time as economic and social ones.

a. What works less well – what could we stop doing or do differently?

Making Space for Nature made a number of recommendations about changes to policy and practice that Link believes need to be advanced through the White Paper. The following are specific examples of where we believe a shift in emphasis or improvements in aligning policies could significantly increase our ability to restore and enhance the natural environment:

- **The England Biodiversity Strategy**

The White Paper should shape the review of the England Biodiversity Strategy. The new strategy will need to adopt a more spatial approach and better reflect the thinking around ecological networks and Ecological Restoration Zones. Political vision and commitment will

⁹ Selman 2006, p.137.

be required if the strategy is to help achieve measurable outcomes (see section 3.1, p5). We believe that local authorities, local partnerships and the third sector will need to be empowered and resourced to play a full role in the delivery of landscape-scale conservation. Adequate advice on conservation delivery on the ground will also facilitate effective delivery.¹⁰

- **Investment in advice and research**

Government should recognise the necessity for investment in high quality advice at all stages: before, during and after effecting change. Training, advice and information have clear potential to increase the awareness of farmers and other rural actors of environmental issues, as well as to support the uptake of agri-environment schemes and improve the delivery of their objectives. The provision of independent and informed advice is particularly important to ensure the successful implementation of HLS, which is targeted towards sometimes very complex challenges facing certain species or habitats. Budget cuts already underway at arms length bodies, such as Natural England and the Rural Payments Agency, will significantly affect the level and quality of information available to farmers and land managers, with likely negative effects on the quality of land management, either through cross-compliance or agri-environment schemes. The discussion document currently does not place sufficient emphasis on the role of advice, research and flexibility.

An important area that could benefit from continued research and advice is the definition and application of environmental limits and the ecosystem approach within policy and decision-making. Defra and the Environment Agency have already undertaken valuable work in this regard, which Link strongly urges Defra to continue.

- **Monitoring and assessment**

Link believes, to determine whether schemes and money are actually delivering what they should be, there is a need to improve monitoring and assessment, particularly in relation to the delivery of ecological outcomes (see question 4). The level of uptake of voluntary schemes should no longer be considered a success indicator, as this bears no relation to what happens on the ground. In addition, we have failed to develop an effective and efficient system to monitor the extent and quality of priority habitats. Rectifying this will be essential to set the baseline and monitor progress towards the 2020 target. The UK Terrestrial Biodiversity Surveillance Strategy should be implemented in England.

- **Enforcement**

Just as there is a proper role for quality regulation there is an essential role for keen, timely enforcement in relation to industry and agriculture, and through planning. There is currently a lack of enforcement of policies aimed at the protection of the natural environment, e.g. in relation to semi-natural grassland. Cross-compliance inspections are not targeted based on environmental risk. A European Commission report¹¹ from 2007 highlights that the majority of payment reductions relate to identification and registration of cattle (mainly missing ear tags). This suggests that the environmental GAEC and Standard Management Requirements (SMR) requirements, which are more complex and difficult to inspect, may be less well checked during inspections.

- **Implementation of the Water Framework Directive and River Basin Planning**

The WFD provides the potential to draw together information on drivers of damage, the environmental and economic costs of that damage and the financial costs of tackling these, to bring together processes and to make them work together. However, the reality is not delivering on this potential: the first round of River Basin Management Plans (RBMPs)

¹⁰ http://www.wcl.org.uk/docs/EBS_10_points_Oct10.pdf

¹¹ European Commission 2007 - *Report from the Commission to the Council on the application of the system of cross compliance* COM(2007) 147 final

promise just 5% more water bodies at Good Ecological Status (GES) by 2015, up from a baseline of only 27%.

Causes of failures must be identified; despite being strategic plans, RBMPs failed to quantify the main pressures causing problems on water bodies. Effective and targeted actions should be identified as the plans contained few new actions. The only exceptions are water company schemes which account for over 80% of the total costs for implementing the first round of RBMPs. There should also be engagement with key sectors that are causing diffuse pollution. 78% of water bodies in England and Wales have been identified as at risk of failing to meet GES due to diffuse pollution. Pollution from farms, roads and urban areas causes widespread damage to freshwater ecosystems and costs water customers hundreds of millions of pounds. However, the total costs for the agricultural sector (the single biggest source of diffuse pollution) have been estimated at just £11,000 per year, while 'Urban and transport', the other key sector causing diffuse pollution, will contribute only £2400 per year. More should also be done to improve smaller waters such as headwaters, ditches and ponds.

Link understands that government and its agencies intend to encourage partnership in water management by adopting a local catchment scale approach to water quality and water resource and flood risk management, which Link would support.

- **Soil**

Healthy soils are vital for maintaining both viable food production and ecosystem services such as carbon sequestration and water regulation and purification. It is vital that soils are given proper protection so they can continue to provide their essential natural functions. Currently there is a lack of emphasis on soil across Government departments and agencies, and this should be examined through the White Paper process.

- **Diffuse pollution control**

Diffuse pollution is a long-standing and well understood pressure on the water environment. It is second only to overgrazing as a reason for SSSI adverse condition in England – over 9,600ha (16.6%) of the SSSI unit area that is not in favourable or unfavourable recovering condition is in this state due to agricultural run off¹². In July 2010, the National Audit Office reported that the Environment Agency estimates at least 30% of water bodies in England are failing to meet Good Ecological Status due to diffuse pollution. This pollution comes at significant cost to water customers, with water companies investing billions in schemes to tackle pollution from pesticides, nitrates and pathogens in the past 20 years. This demonstrates the failings of current voluntary, incentive and regulatory measures and leaves our performance trailing behind that of most countries in northern Europe.

Rectifying these problems requires a stronger integrated package of reliable evidence on the effectiveness of water management techniques. For example, there should be a wider, targeted extension of the Demonstration Test Catchment or Water Friendly Farming approach to evidence gathering, with more involvement of the NGO and land manager sectors. It is important that there is advice, incentive, regulation and enforcement which build on current best practice, e.g. Catchment Sensitive Farming and the Voluntary Initiative, but with the credible threat of targeted regulatory measures in specific areas to achieve statutory objectives if and when incentive approaches fail. Specifically, Water Protection Zones should be introduced in those areas where voluntary and supportive measures have not proved successful by 2011.

¹² Natural England web site report dated 1 October 2010 (<http://www.english-nature.org.uk/Special/sssi/reportAction.cfm?Report=sdr17&Category=N&Reference=0>)

We also need to recognise that effective advice and incentive approaches are resource-intensive, and look to funding streams outside of the limited agri-environment pot e.g. taxes on inputs, using national envelopes to free up resources from Pillar I CAP, crop protection/fertiliser and livestock industry led initiatives and/or fundamental CAP reform in the medium term.

To maximise benefits from improving water quality it is also important that water management is carried out in an integrated way. The development of a more integrated framework for delivery should support the drawing together of the various inter-related policies within a given area to provide a framework for changing our water management and encouraging us to look at both point and diffuse sources in an integrated way.

- **Coastal management and marine**

Managed realignment is failing to keep up with losses, and even schemes designed to meet minimum statutory requirements are falling behind and failing to take into consideration all impacts, particularly at a species level. Link strongly supports the new marine planning system for regulating development and wildlife licensing seaward of the mean low water mark. The issues it needs to address in the current state of the UK marine environment are considerable and pressing. The operation of the new system will need to be carefully monitored and resourced in the coming years.

We particularly urge the use of the outcomes from the UK-wide state of the seas report, *Charting Progress 2*, to highlight the need for planning and decision-making that truly contributes to sustainable development. *Charting Progress 2* indicates there has been an increase in marine activities alongside deterioration of marine habitats and species. This provides clear evidence that we are over-exploiting and damaging our marine environment. Consequently, the concept of living within environmental limits must be given much greater prominence if we are to achieve sustainable development.

Marine Protected Areas are at the heart of marine nature conservation. Therefore, the designation of an ecologically coherent network of sites for the UK, including a sufficient number of highly protected sites, by 2012 is essential to the recovery of our marine environment.

- **Reform of the planning system**

Link has voiced concerns regarding the passage of the Planning Act 2008 and the drafting of National Policy Statements. Included in our concerns were the ability of the public to participate fully in public inquiries into major infrastructure projects and whether the natural environment would be given as much weight in policy and decision-making as previously. The Government has sought to address a number of these concerns through its proposals for 'Open Source Planning', but plans further major reform to the system at a local level, influenced primarily by the urge to devolve power to local authorities and communities and to boost economic growth. The capacity and expertise for planning and other environmental services are currently highly variable between local authorities. This will need to be properly addressed if the potential of localism is to be fully realised including local and sub-national economic activity contributing to the required shift to a biodiverse, low carbon economy.

- **Biodiversity Duty under s.40 of the Natural Environment and Rural Communities Act 2006**

The Biodiversity Duty, to have regard to biodiversity, should have heralded significant action from public bodies on biodiversity. However, in reality it has had a fairly limited impact. The weak nature of the duty and lack of national Government support have led to uncertainty over what this means at an organisational or local level, and a lack of enforcement.

The duty on public bodies under this Act needs to be better defined and better supported to ensure that it achieves what it was set out to do. *Making Space for Nature* recommends that government should support local authorities by clarifying that their biodiversity duty includes planning coherent and resilient ecological networks, which Link would support. Link also believes that identifying senior natural environment leads in each government department, and appointing an elected representative as a champion in each local authority, will help ensure, with sufficient advice and guidance, that the natural environment is more firmly embedded in policy and decision-making.

- **Measure resource use to inform policy**

Growing interest in resource efficiency and the benefits this can bring to manufacturers, consumers and society at large, is not matched by routine use of proper measures of resource use to guide improvements (i.e. reductions) in the use of global resources. Meanwhile, there is growing evidence of UK and European environment problems being exported, and this is compounded by the trend for corporations, often supported through Government trade policy, subsidies and export credit guarantees, to outsource the manufacture, supply and disposal of products eventually consumed in Europe.

Question 4: What mechanisms should we focus on to ensure we manage our natural systems more effectively in future?

As referred to in our answer to Question 1, Link believes that a new statutory national spatial and strategic framework will be required to drive integrated decisions about land use and land management to achieve ecosystem recovery and effectively manage natural systems.

There needs to be a step change in the speed and scale of ecosystem restoration and habitat creation by introducing mechanisms for positive planning, encompassing all aspects of land use and land management. The framework should identify the appropriate sub-national scale (e.g. catchment or other appropriate ecological unit) at which organisations should work to identify the components of ecological networks, including the identification of Ecological Restoration Zones (ERZ). In summary, these zones should identify:

- wildlife rich areas for protection and enlargement;
- opportunities for habitat creation, restoration and enhanced connectivity;
- where increased permeability is required through the promotion of natural processes; and
- target areas, at an ecosystem level, for agri-environment funding and incentives.

Government agencies have a key role to play in the ongoing and future management of the natural environment. An example of this is Natural England's role in the provision of scientific evidence and expert advice, delivering on the SSSI network, administering agri-environment schemes and providing financial support to the NGO sector for conservation activities.

The Environment Agency plays a fundamental role in monitoring and regulating discharges into the environment, protecting countless wetlands in the process, and is responsible for overseeing flood risk management activity, which benefits both people and nature, throughout the whole country. The Environment Agency will be key to delivering WFD objectives in the future; otters would arguably never have returned to our rivers and it is through the work of the Agency that the objectives of the WFD will be facilitated in the future. Both Natural England and the Environment Agency have been, and will continue to be, key partners as we move forward in delivering a better, healthier environment in the future.

The Forestry Commission England has undertaken valuable conservation work over the years, and it is important that the valued ancient woodland, open habitat and access

opportunities provided by the Public Forest Estate are safeguarded during a period of change. Link supports the Forestry Commission's *A Woodfuel Strategy for England*¹³, which aims to bring an additional two million tonnes of timber harvested from English woodland on to the market each year by 2020, and would help the market in sustainable woodland management.

Education and access to the natural environment are vitally important, and are clear mechanisms for promoting the natural world and rural economies, and teaching people about them. Government must also include these as priority areas of work.

In the marine environment, we now have a number of pieces of legislation that should deliver better wildlife protection. However, to ensure that the natural marine systems are managed more effectively in the future, this legislation needs to be fully and effectively implemented.

- **Landscape-scale conservation**

Landscape-scale conservation builds on the current protected areas approach; indeed these protected areas are central to a landscape-scale approach as they are the core areas that will support biodiversity even if the species present there change over time. Buffers around these special sites need to be given top priority, along with functional connections between the key landscape areas. Local wildlife sites and other local designations are also important nodes for landscape-scale restoration. National Nature Reserves are currently the crown jewels in our landscape and their long-term management, in favourable condition, needs to be assured.

Fundamental to the success of landscape-scale conservation will be the need to move beyond simply thinking about this approach in terms of discrete projects. Rather, we will need to see the various schemes and projects as exhibiting the range of principles and approaches that need to be embedded and delivered across every landscape if we are going to secure the recovery of the natural environment and ecosystems.

Woodland biodiversity is in crisis, with a range of taxa suffering large scale declines due to the reduction in woodland management and continued growth of non-native conifer Plantations on Ancient Woodland Sites (PAWS). One mechanism that has attempted to halt this decline is woodland improvement grants administered by the Forestry Commission. While the development of new markets and support for this development is an important area of work, improvement grants to help woodland owners deliver increased biodiversity should be retained and increased. Any restructuring of the public forest estate should not jeopardise the restoration to native woodland of PAWS sites which is currently taking place.

- **A revised implementation of WFD, and a statutory duty to clean water networks**

Freshwaters face very severe and ongoing threats. Despite major investments, WFD is making slow progress on the improvement of all water bodies. It has also become clear recently that rivers have not been improving as quickly over the last 20 years as was believed. Lakes are in an equally poor state, and 80% of ponds in England and Wales are in poor condition. There is some good news: headwater streams improved in England between 1998 and 2000, although there was little change in rivers over this time.

The WFD covers all waters, but the non-categorisation of many smaller waters as water bodies must be remedied, and the Government and its agencies should establish measures to restore and protect ecologically significant ponds, headwaters, streams and wetlands in the next generation of River Basin Management Plans.

¹³ http://www.wcl.org.uk/docs/2009/Link_position_statement_Woodfuel_Strategy_03Jul09.pdf

- **Better regulation**

The emphasis should be on quality and better regulation, rather than simply less regulation. Two approaches from the planning arena that may be worth considering are the 'development management' approach to planning control, consulted on by CLG in late 2009, and the 'significance' approach to the protection of heritage assets set out in PPS5. Both approaches are aimed at using regulation to achieve stated objectives and to selectively focus the use of it better on achieving them.

- **Polluter pays**

More explicit clear links between environmental degradation and costs, in terms of damage to biodiversity, carbon and money should be examined through the White Paper process. For example the sustainability of water management can be tracked through the extent of water treatment.

- **Environmental limits**

Better understanding of environmental limits and how to apply these practically at local and sub-national levels is required. Early work by Defra and CLG was underway on how to apply limits to the now cancelled PSA on sustainable economic growth and we would like to see this work resumed alongside the emphasis on local and sub-national economic growth and planning reform.

a. *How should we define success?*

Link believes that only measurable outcomes can allow us to define success and we have, above, outlined the key areas we believe need to be considered. We believe there should be a shift in focus from 'outputs' to 'outcomes'. Our definitions of success should move beyond the process targets of recent years, to measurable outcomes that drive the right action and investment, and genuinely represent success. Ultimately this has to relate to what biodiversity (species and habitats), ecosystem services and landscape benefits are delivered. For example, under ELS, a key indicator of the scheme's success is still the level of uptake. This indicator was politically driven, being directly linked to the Government's target to achieve 70% of agricultural land under an agreement and bearing no relation to the quality of the scheme for environmental delivery. However, despite the uptake of schemes, the index of farmland birds continues to decline.

We need to assess the health of our ecosystems – for example the condition of soils and the quality of rivers and wetlands, as well as the priority species and habitats that ecosystems support. The impacts of restoration methods need to be monitored to ensure that we take a holistic approach to restoration that does not sacrifice one element of that ecosystem to benefit another.

However, nationally, restoration of the natural environment is something that has to happen irrespective of short or medium-term measures of success. As the discussion document identifies, society depends on the health of the natural environment for many ecosystem services. The cost of providing these services artificially, for example through expensive water treatment, demonstrates that we do not currently have a healthy natural environment.

b. *How can we agree on common goals and assess our progress towards them?*

First, we need to build on what already exists. We already have common goals for most biodiversity priority habitats in England in the form of SMART biological targets for 2010, 2015 and in some cases 2020. These were produced after careful consultation and were signed off by government in 2006. The priority should be to report on progress against these at the end of 2010 and then get on with delivery. Progress against these outcomes will be a

key test of whether this Government is the greenest ever. European environmental legislation like the WFD also sets out targets for achievement with clear timescales.

Setting goals through collaborative working would enable government and civil society to work together to conserve the natural environment. NGOs have expertise across a wide range of policy areas and can help to set ambitious and realistic goals for the future, and *Making Space for Nature* calls for NGO work on identifying opportunities at a spatial scale to be 'built on and refined'. It is important to recognise that the priorities of sectors impacted by some environmental goals will be to limit the impact of these goals on their business, and that this may be in conflict with the needs of the natural environment. Once goals are established, all sectors should have a key say in how they are achieved.

We need a revised monitoring programme which effectively delivers our measurable outcomes. At present, there are both important gaps in the monitoring of the freshwater environment and unnecessary duplication. A national working party involving both statutory and non-statutory organisations should be established to advise on the design of a new water environment monitoring programme.

Question 5: How best can we reduce our footprint on the natural environment abroad, through the goods, services and products we use?

Government should commit to reducing the UK's ecological footprint by adopting a strategic approach to the transition to sustainable systems of production and consumption. A strategic approach would prioritise high impact systems, including food, housing, energy and transport, and key commodities including those listed in the discussion paper: water, palm oil, seafood, and timber. To this list we would add soy, and meat and dairy products.

The following would be key elements of a strategic approach:

- **Consumption-based indicators, targets and strategies**

As with domestic greenhouse gas emissions, the Government should put strategies in place for consumption to ensure we are on a sustainable trajectory. These should be based on the latest evidence on environmental limits and natural resource scarcity. The potential impact of policy options on footprint (e.g. land, carbon, water) should be assessed as part of the Government policy appraisal processes.

- **Sustainable agriculture**

UK farming has environmental impacts both here and abroad. Farming subsidies, including direct payments and export refunds, can drive down environmental standards in other countries. The UK Government should encourage sustainable production at home and abroad to reduce our ecological footprint. Growing reliance on imported products such as soy for animal feed is causing significant impacts globally, with soy plantations being a key driver, both directly and indirectly, of deforestation in Latin America and threats to other important habitats such as the Cerrado. The UN Biodiversity Outlook 2010 highlighted the urgent need to tackle these drivers of biodiversity loss. This land use change is also a significant contributor to global greenhouse gas emissions.

For UK agriculture to become more sustainable we must recognise the other ecosystem services which our farmed landscape provides in addition to food and fibre, such as water purification, flood water storage and carbon storage in soils, as well as supporting a wide range of important biodiversity. For these services to be protected, reform of the CAP is essential with rewards for the delivery of the desired suite of ecosystem services and public benefits and an advisory service which can support land managers in delivering this. Across many areas it will be possible to deliver multiple benefits, although there will be areas where decisions will need to be made about the particular priority for delivery there.

The discussion paper does not mention the impacts of intensive livestock production either overseas or in the UK where it is a significant factor in loss of biodiversity and pollution. The Government should measure the impacts of livestock production abroad and devise a strategy to reduce those impacts in such a way that it supports sustainable UK production of meat and dairy products. Such an approach is set out in the Sustainable Livestock Bill.

- **Sustainable livestock**

There is now growing awareness of the environmental impacts of intensive livestock farming. Intensive livestock production is a significant source of global greenhouse gas emissions, especially when overseas land use change is taken into account. In South America, rainforests and other important habitats are being cleared for cattle ranching or soy plantations to provide animal feed for the EU, resulting in devastating loss of biodiversity, as well as contributing to climate change. Closer to home the intensification of livestock production in the UK has been partly responsible for increased water pollution, soil erosion, the release of soil carbon and declines in biodiversity – only 2% of England's grassland is still rich in biodiversity.

We need a suite of integrated policy measures to ensure that livestock farmers in the UK are able to reduce their global impact, at the same time as being supported to produce high quality food and rewarded for making a positive contribution to the management of the UK's natural environment. Such an approach is set out in the Sustainable Livestock Bill. This strategic approach would ensure that a solution to one part of the problem does not simply create problems elsewhere. For example, it would ensure that policies bring benefits for UK biodiversity as well as reducing greenhouse gas emissions, and making sure that production is not simply displaced overseas.

The Government should support work in defining a sustainable diet, integrating this into advice to consumers.

Healthy planet eating

A recent study for Friends of the Earth¹⁴ suggested that lower meat diets could save over 45,000 lives a year and cut costs in the NHS by over £1 billion a year. Highly processed meat was found to be most damaging and the nutritional value of some meat has decreased as a result of modern farming methods. Grass fed meat and dairy products were found to be healthier as well as having the potential to deliver environmental benefits – and so need to be supported and clearly identifiable to consumers¹⁵.

- **Sustainable public and private procurement**

Despite the spending cuts, the Government still has significant influence over markets through purchasing decisions. The Government also needs to take a lead in best practice in sustainable sourcing to inspire action in the private sector and wider public.

Specific measures include the following:

- Now that certification systems are up and running for wood products, palm oil, soy and seafood, set them as minimum standards within public procurement contracts;

¹⁴ http://www.foe.co.uk/resource/reports/healthy_planet_eating.pdf

¹⁵ Further evidence of the link between sustainable and healthy diets can be found in this report by the Barilla Center for Food Nutrition. http://www.barillacfn.com/uploads/file/72/1277905159_PositionPaper_BarillaCFN_Double-Pyramid.pdf

- Build on existing Government initiatives such as the Public Sector Food Procurement Initiative and the Sustainable Procurement Action Plan, to implement best practice and drive sustainability through procurement procedures at all levels of Government;
- Share and promote best practice in sustainable procurement with the private sector.

- **Roadmap towards a zero-waste economy**

We welcome the Secretary of State's recent commitment to working towards a zero-waste economy, and also the Government's review of England's waste strategy. This is crucial not only to minimise pollution and landfill, but also to maximise the reuse and recycling of materials, reducing the impact of primary extraction on the natural environment. The Government should create a roadmap towards a 'cradle to cradle', zero-waste vision, where all resources are used in cyclical, not linear, processes – either a biological cycle, where renewable resources are grown, used and composted, or a technical cycle, where non-renewable resources are endlessly recycled and never sent for final disposal.

Question 6: What best practice and innovative approaches to protecting and enhancing our natural environment do you think should be considered as we develop the White Paper?

- **Landscape-scale conservation**

The importance of landscape-scale conservation and cross-boundary cooperation must be central within the White Paper. We recognise the range of competing demands on land and also the need for the land to be healthy, productive and biologically diverse. To be truly effective we need to take a multi-faceted approach to habitat restoration and improvement on a landscape scale. Our existing high quality protected areas that are important for wildlife and people, including non-statutory Local Wildlife Sites and other places which support priority species and habitats, need to be properly protected within the planning system and through agricultural and rural policy. We need to restore and re-create habitat, and we need better connectivity between wildlife sites including, where appropriate, physical linkages and buffering. We need more environmentally sensitive land use within the wider countryside and farmland to enhance its natural qualities and protect resources such as soil and water.

- **Multiple benefits from the natural environment**

Link members, in partnership with a wide range of partners, are taking coherent approaches to land management that deliver multiple benefits in a cost-effective way. We are delivering a large number of schemes that are benefiting ecosystem services such as freshwater, carbon storage and flood risk management, as well as biodiversity. There needs to be better recognition and understanding of these approaches and effective mechanisms for sustainable funding of such schemes.

- **Flexible approaches to land management incentives**

Properly resourced Environmental Stewardship schemes are an important tool for maintaining and expanding significant areas of priority habitats and populations of priority species and improving the farmed landscape. Greater flexibility is required in the targeting of these schemes to help buffer sites and establish stepping stones and ecological corridors.

- **The natural environment in our cities and within development**

There are many examples of where the natural environment is being incorporated within the design of new buildings and the redevelopment of our cities which not only enhance biodiversity by providing new habitats but also aim to improve sustainable water management and enhance energy efficiency.

- **Biodiversity offsetting and developer contributions**

Link recognises the potential of biodiversity offsets established through the planning process as a mechanism that could be used to compensate for damage to the natural environment,

but we do have some concerns about the way in which the programme might operate. We therefore support the principles outlined in *Making Space for Nature*, which we believe must underpin the system if it is to be effective. The new integrated framework and activity at a sub-national level to identify areas for restoration will provide a means of targeting any offsets generated. Offsetting should not be regarded as a first use policy or one which absolves the Government of its responsibility to protect natural assets.

- **Agri-environment success**

The RSPB farm in Cambridgeshire is managed under an ELS agreement. Here generalist arable species have shown a 201% increase since management began. The scheme has been carefully developed to provide the full range of resources for farmland bird species.

Several BAP Priority butterflies are doing better on sites in agri-environment schemes (Countryside Stewardship Scheme and now HLS) compared to sites not in schemes. They include the Adonis blue and silver-spotted skipper (which have been taken off the BAP as a result of management, but would almost certainly decline if HLS ceased). The marsh fritillary is recovering in several counties after decades of decline thanks to HLS (and previous CSS) agreements.

Agri-environment schemes have been behind the reversal of the decline of natterjack toads at various sites in Cumbria. In Anthorn in the 1980s the colony was down to tens of animals and now numbers high hundreds or thousands. Spawn and tadpoles have been used to establish new colonies nearby and a third translocation scheme is underway.

A thorough study of the impacts of Environmental Stewardship on plants has been undertaken. In the study area, 283 species could potentially have their needs met by ES. Of these, 49 (17%) could potentially have their management requirements met by an ELS option. The remaining 234 species (83%) require a HLS option. Therefore without HLS we could lose 73% (234 out of 319 total) of rare and threatened flowering plants through lack of funding for appropriate management in this area.

- **Creating clean water networks, and installing contaminated water treatment ponds and wetlands**

Unpolluted water is now scarce in the English landscape, particularly in the lowlands. Many species are at risk because of pollution, including both point source and diffuse pollution. Creating networks of new clean water habitats is, therefore, an important part of the strategy for protecting freshwater biodiversity. Making new clean water ponds and wetlands is a quick, cheap and easy way of putting back unpolluted water in the landscape. This approach has a disproportionately high impact because, despite their small size, ponds are exceptionally rich wildlife habitats, and mediate most water-based ecosystem services. Typically, although occupying the smallest physical area in most catchments, they also support the largest range of freshwater plants and animals.

Creating clean water should be an explicit option in agri-environment schemes and every farm should be encouraged to have its 'clean water field' as part of habitat network development.

As well as making clean water networks there is also a need for much more systematic and widespread use of ponds and wetlands to intercept contaminated water. The development of contaminated water management networks needs practical trialling (for example in the Demonstration Test Catchment or Water Friendly Farming projects) prior to extensive roll-out. Although there is good evidence of local scale effects, catchment scale benefits require further demonstration.

- **Better than Landfill**

Despite the drive to improve recycling rates in the UK and Europe around half of all recyclable materials arising in Europe are disposed of rather than recycled. Landfill levies and taxes have helped divert more recyclable waste from landfill, but progress is far from speedy. Whilst not the only policies for improving recycling rates, alongside producer responsibility initiatives and intensive communication with consumers/householders, prohibiting landfill and incineration are valuable policy tools to achieve the required step changes in resource efficiency, product design and carbon emissions. In Flanders, bans on unsorted waste from landfill and incineration have helped rapid achievement of 70 per cent recycling rates, well above England's best performing local authorities.

Case study

SCaMP project

United Utilities owns 57,500ha of land in the North West of England, around 20,000ha in the Forest of Bowland and the Peak District. Around 18,000ha of the land in the Peak District is covered by a Sustainable Catchment Management Plan (SCaMP) and water derived directly from this region supplies several million people in the North West of England. In SCaMP areas there is a programme of habitat restoration through encouraging changes in farming practice, drain blocking to restore blanket bog, establishing of woodland, restoration of upland heath and the revegetation of exposed peat. These actions were originally funded to improve SSSI condition but early indications are that water quality and colour are also responding positively to the change.

Question 7: How best can we harness and build on public enthusiasm for the natural environment so people can help improve it through local action, as informed consumers or by shaping policy?

- **Community involvement**

Community involvement is key to ensuring that the public is engaged and values the natural environment. For example the *Our Rivers* campaign engages communities to understand their local river. There are also many local groups working on small water bodies which have local resonance, where individuals and landowners can make a real contribution. However, new approaches here are still needed, for example adoption of the Flagship Pond concept and the Pond Trail concept, as traditional approaches to 'protecting the village pond' have largely failed (they are part of the model which leads to 80% of ponds being in poor condition). At larger spatial scales, for example at a River Basin District level, it is much harder for people to engage, as they do not have the knowledge. Decision-making at this level is vital for the natural environment, however, and there must therefore be strong links between local action and supra-local planning for the natural environment.

However, there are implications, costs and time required to manage volunteers and community involvement in these projects. There should be a process in place to ensure that key benefits to society do not 'fall through the cracks'.

- **Fostering enthusiasm and increasing awareness**

We should build on schemes that already exist, while also raising awareness of existing policies and ensuring that knowledge is transferred between communities and individuals so that they are empowered to deliver better natural environment outcomes. This will help people to understand the natural environment in their local area, and how they can improve it. Education is key to allowing people who already respect and value their local area and its natural environment to understand what action they can most productively take to enhance it, whether this be volunteering at a local wildlife site, working to create new habitats or buying local food to support the economy and distinctive character of the countryside.

- **Consumer action**

The role of the market in farmer decisions is growing in relative importance as farming subsidies are decoupled from production and agricultural markets are liberalised. The CAP reform agreed in 2003 explicitly aims to reorient farmers towards the market and has introduced a payment system that will free farmers to respond to market forces and thus to consumer demand. Trends in consumer demand have continued to evolve and the main 'ethical' food labels – organic and Fairtrade – have now established themselves within the food market, while the number of smaller brands that add value through claiming higher environmental standards have proliferated. There is therefore a clear opportunity for consumers, through their direct purchasing power, to drive higher production standards in the wider countryside. Key to ensuring 'green' labelling delivers environmental benefits above and beyond the legislative baseline is a robust framework to monitor assurance standards.

Question 8: What should be our vision for the role of Civil Society in managing and enhancing the natural environment and for engaging individuals, businesses and communities in setting the agenda for that work?

Link would suggest that the vision for the role of Civil Society should be that people in every community recognise the value of the natural environment and are supported to take action to protect, enhance and restore it. Developing the role of Civil Society will require enhancing the initiatives and approaches described in Question 7.

For Civil Society to succeed in its role, government must also play its part. Government must provide the framework within which Civil Society can operate to greatest effect. The recent Comprehensive Spending Review identified that an investment of £470 million would be made available to support capacity building in the voluntary and community sector. The commitment of resources is essential in developing the role of Civil Society in shaping policy and decision-making and taking direct action to manage and enhance the natural environment.

- **Managing sites of biodiversity importance**

Many environmental organisations own and manage significant areas of land for biodiversity and landscape benefit. The contribution that conservation organisations make to the management and enhancement of the natural environment is significant, but the land directly owned by NGOs will only ever make up a small proportion of England's land area. Further sites under the ownership and protection of the state are also critical and, beyond this, so is the sensitive management of the farmed countryside (links to Lawton Recommendation 8).

In addition to owning and managing land for environmental benefit, many conservation organisations actively support farmers and land managers to manage their own land more sensitively. Each year Link member organisations provide targeted advice covering hundreds of thousands of hectares. By speaking with farmers about key species of conservation concern, helping them into agri-environment schemes and giving them advice and support throughout their agreements, conservation organisations have been able to increase populations of threatened species as well as boosting the income of their farmer clients. However, due to funding and capacity constraints, the ability of conservation organisations to provide direct support and advice is limited. It will never be a substitute for government-funded advice provision which is able to penetrate across the entire country.

- **Recognising the limits of NGO capacity**

Link members already make a huge contribution to protecting our natural environment. Link brings together over 30 voluntary organisation and taken together our members manage over 690,000 hectares of land, collectively employ 10,000 full time staff, have the help of 170,000 volunteers and the support of over 8 million people in the UK. In this time of

austerity it is currently unclear what more will be asked or required from us. NGOs, like any organisations, have capacity issues, and would need extra support to fulfil a significantly expanded role.

- **Re-establishing the link between people and the natural environment**

Many people have become disconnected from the natural environment around them, particularly those who rarely if ever visit the countryside. However, the public has made clear they expect land to be managed in ways which support and improve biodiversity, for their food to be produced to the highest environmental and animal welfare standards and for culturally and environmentally important landscapes and woodlands to be protected and enhanced (Eurobarometer 336, 2010). The public expect their money to be used to promote sustainable farming and appropriate agricultural activities in areas that are important for nature, such as Natura 2000 sites, as well as supporting more widespread conservation priorities.

This strongly points to the need to maintain and advance recent changes in the way support is channelled to farmland through the CAP. Public investment must be in return for the delivery of environmental public goods including wildlife and landscape quality.

Case Study: Volunteer monitoring

The Riverfly Partnership Angler's Monitoring Initiative (AMI) trains volunteer groups to monitor the water quality of their local rivers by looking for pollution-sensitive invertebrates. The initiative is endorsed by Government agencies, allowing water quality to be checked more frequently and at a wider geographical scale than would otherwise be the case. This volunteer-driven monitoring scheme provides a valuable insight into the health of river ecosystems and has already led to the successful detection of pollution and prosecution of the culprits.

Question 9: How best can Government incentivise innovative and effective action on the natural environment, across England, at the local level?

- How best can local Government and other local partners work together to improve local outcomes on the natural environment, and pursue a more integrated approach linking a healthy natural environment to economic prosperity, sustainable development and a better quality of life, health and wellbeing?***
- What are the most effective mechanisms for managing the natural environment where cross-boundary issues are involved, and making the link to other mechanisms for economic growth, transport and planning?***
- How best can the value of the natural environment be considered within local planning?***

- **A strategic approach to local delivery**

Any local or sub-national governance structures must be set within the context of a strong national framework as described above. Local, or sub-national, decision-making will be based on a collective understanding and knowledge of the area in question. Link members' experience suggests that successful development of landscape project ideas relies on a combination of national strategic guidance and expertise with local partnerships and local expertise. Groups would draw together key local data sets to set objectives and identify local solutions to particular issues. To support this process government should make available national data on for example species and habitat trends and hotspots or other physical or biological features that would provide context.

The governance of England's natural environment is often overlooked but is extremely important. Several recent studies, including *Making Space for Nature*, and the Adaptation

Sub-Committee's first report on the UK's preparedness for climate change, have highlighted the importance of strategic spatial planning at a sub-national level for the natural environment. Link therefore suggests that some form of strategic planning be incorporated within the reformed planning system, with the 'ecosystem-level recovery groups' mentioned in Part 1, Box 3 as a possible model.

The Government has progressed the establishment of Local Enterprise Partnerships (LEPs) as a mechanism for joint working between local authorities and business focusing on local economic development. There is currently uncertainty, and no apparent direction from CLG, on whether LEPs will take on responsibility for cross-boundary planning and action on the natural environment. As we have mentioned throughout this response, Link believes that an integrated approach is required to achieve protection of the natural environment and also sustainable development. This should mean that the LEPs, like Regional Development Agencies, should have as a core purpose the achievement of sustainable development in line with the UK's Sustainable Development Strategy. Creation of governance structures which are purely focused on one pillar of sustainability will not deliver an integrated approach and may, therefore, lead to environmental considerations being left out of economic decisions.

A strategic approach could also be helped by effective neighbourhood partnerships, as recommended by the Sustainable Development Commission¹⁶. The SDC set out 10 recommendations to encourage, enable and empower communities, local government and other bodies to work together on integrated neighbourhood retrofit programmes. Link considers that these same principles and recommendations can be applied to neighbourhood partnerships working on any matter.

- **Cross-boundary working**

AONB management plans that bring together local authorities and a range of economic and social as well as environmental partners have proved to be very effective at the wide range of spatial scales which different AONBs cover. In an urban context, the Community Forests and recent green infrastructure initiatives in urban and urban fringe areas are often similarly cross-border in nature, and have made a significant contribution to achieving landscape-scale conservation, and appreciation of aesthetic beauty and tranquillity, in an urban context.

Another planning reform proposal by CLG is to introduce a duty to cooperate within the Localism Bill which will require local authorities to work together on cross-boundary issues. It is unclear at this stage what this duty will encompass, or the issues which may be likely to trigger its application. Link urges Defra to engage in the discussion about the parameters of this duty and seek to apply it to action to support the restoration and recovery of the natural environment and ecosystems.

- **Embedding environmental limits and an ecosystem approach into spatial planning**

The question of how environmental limits can be reflected in spatial planning is not an easy one to answer. In some ways, planning already incorporates principles of limits through defining acceptable scales of development. Governments have tended to define environmental limits in targets and laws set to safeguard the natural environment at different spatial scales. While these commitments are not in themselves sufficient to prevent environmental limits being exceeded, they do provide a useful reference point to assess government progress. However, environmental limits are not generally made explicit and there are two key challenges that arise:

¹⁶ 'The Future is Local: Empowering Communities to improve their neighbourhoods' July 2010

- how to define these limits, in particular the extent to which they are a product of social judgement based on technical data, rather than being scientific absolutes; and
- the scope and influence of the spatial planning system.

There has been some valuable work already undertaken by Defra and others on how to embed the ecosystem approach and how to apply the principles of environmental limits to spatial planning¹⁷. Link strongly urges Defra to continue this work and help improve the planning system so that it can benefit the natural environment in the long term.

Question 10: How best could the economy reflect the true value of nature's services in the way business is done, to drive smarter, greener growth?

Link welcomes the recognition, throughout the discussion document, that a healthy natural environment is essential to a healthy economy. The international TEEB study and the UK NEA have made great progress in recognising and quantifying the economic value of the natural environment. The findings will need to be translated to a local level if they are to be fully relevant to the businesses and communities which rely on that value. This should include a requirement on government to report on some national measure of the economic value of the natural environment.

Quantification of the economic value of the natural world should not be considered in isolation, as this may risk reducing it to the status of a commodity to be traded. The discussion document recognises that the natural world has an intrinsic, less tangible value. The social costs or opportunities must be taken into account in any decisions about management of land at local and national level.

The White Paper must have cross-departmental support and the value of the natural environment should be fully embedded in the planning and decision-making processes of all departments. The proposed cross-Cabinet committee (Question 1, Principle 2) could play a critical role in establishing and maintaining high-level support and accountability. BIS and DECC, as well as CLG, should be engaged in the White Paper and this must translate into a wider consideration of the natural environment in decisions about economic development and energy security. Spatial planning and opportunity mapping could make a valuation of the economic potential of ecological restoration, and this could be coupled with incentives to encourage private investment to capitalise fully on economic opportunity.

- **Make the case for the transition to a green economy**

Defra needs to develop and present a convincing and coherent argument as to why the economy is underpinned by natural assets and services, and make the case for green economic development in the future. Environmental sustainability needs to be explicitly recognised as a prerequisite for sustainable growth and development. The Government should identify the necessary policies, tools and systems to commit to action and articulate a vision for 'green' economic prosperity within the context of an updated UK Sustainable Development Strategy.

- **Green taxation**

There is widespread acknowledgement that further government intervention in markets is necessary to ensure the full environmental costs of production, consumption and resource use are internalised in the price of goods and services.¹⁸ This would incentivise businesses to become more resource-efficient and reduce environmental impacts. It would also

¹⁷ See 'Securing a healthy natural environment: An action plan for embedding an ecosystem approach', Defra, 2007 and 'Environmental Capacity in the East of England: Applying an Environmental Limits Approach to the Haven Gateway', Commissioned by the East of England Regional Assembly <http://www.eera.gov.uk/publications-and-resources/studies/topic-based-studies/environment-studies/environmental-capacity/>

¹⁸ See for example the TEEB report for policy makers (2009) and the Stern review of the economics of climate change (2006).

incentivise consumers to adopt more sustainable lifestyles as products with a high impact on the environment would become more expensive than more sustainable options. Currently the reverse is often the case – for example travelling by train is often more expensive than travelling by car or plane.

The Government’s commitment to ‘increase the proportion of tax revenue accounted for by environmental taxes’ should be implemented urgently and in line with recommendations of the Green Fiscal Commission’s report, *The Case for Green Fiscal Reform*.

- **Incentivise environmental protection through payments for ecosystem services**

Payments for ecosystem services (PES) involve payments or tax concessions to owners or users of natural assets to maintain ecosystem services. The payments reward the provision of ecosystem services and promote the sustainability of global supply chains. Payments can be complicated and difficult to implement and results mixed. In developing a strategy for PES the Government should draw on existing experience and build into its approach a consideration and assessment of a range of approaches to conserving biodiversity and ecosystems, to draw up a strategy for applying and extending this principle, building capacity and promoting best practice both in the UK and overseas. Where PES are used for biodiversity conservation they must respect the rights of local communities and consider the role of community-based governance to conserve biodiversity and ecosystems.

Defra should work closely with the Treasury, BIS, DECC and DfID to respond to recommendations on PES of the TEEB report for policy makers. The Government should also consider PES in the context of interlinkages between international policy processes addressing key environment and development challenges. The Secretary of State, Caroline Spelman, recognised this in her speech at the Nagoya conference.¹⁹

Question 11: Responsible businesses are already looking for ways to reduce their impact on the environment. How can we encourage more action like this?

The business sector should not be seen in isolation from communities, but rather as an integral part of them, and in many cases as enablers of community action. Link believes that businesses should be encouraged to form part of the partnerships at a local level which will be taking a lead in identifying and delivering for protection, enhancement and restoration of the natural environment, including within Ecological Restoration Zones.

- **Pollution Mitigation contribution**

At present, the cost burden for dealing with diffuse pollution largely falls on water customers, taxpayers and the environment. This market failure could, in part, be addressed by voluntary or statutory revenue-raising from the crop protection and fertiliser industries, or by taxing products at the point of sale. The price signal will offer some encouragement to change behaviour, while the revenues raised could be used to mitigate impacts and offset damage through mitigation and habitat restoration/creation.

- **Measure resource use and implement sustainable procurement**

Responsible businesses welcome good quality regulation, use of fiscal incentives and green taxation, and are also exploring the role of their UK and international supply chains to stimulate resource efficiency and producer responsibility. By introducing national measures

¹⁹ “It is essential that biodiversity, climate change, food security and poverty reduction are tackled together. We will not succeed if we try to deal with them individually. The Summit last month in New York, our meeting in Nagoya this week and Cancun next month provide us with a tremendous opportunity to address these interlinked challenges. Together, we must seize it. We simply cannot afford not to”. <http://ww2.defra.gov.uk/news/2010/10/27/nagoya-biodiversity-conference/>

of resource use, the Government can complement best practice procurement and supply chains in business and use this information to drive new policy.

Question 12: What are the barriers to joining up and seeking multiple benefits from our natural assets?

As already discussed within Question 2, a significant barrier to seeking multiple benefits from our natural assets is the array of poorly integrated policies and mechanisms that currently determine how land is used and managed.

Another barrier to achieving multiple benefits from our current natural assets is the lack of connectedness between protected areas and other important landscapes and wildlife-rich areas. As confirmed by *Making Space for Nature*, our statutorily protected areas (such as SSSIs) do not comprise a coherent and resilient ecological network, and most of England's other semi-natural habitat outwith these sites is generally insufficiently protected and under-managed. The natural connections within our countryside have been degraded or lost and natural processes (such as effective floodplain storage) have been interrupted and damaged. Green Infrastructure has an important role to play in seeking multiple benefits from land and in providing people with access to green spaces and the natural environment.

Amongst the public, landowners and even among planners, there is a lack of understanding about the meaning of 'ecosystem services'. This is a barrier that needs to be tackled and broken down by the White Paper. Taking a landscape-scale approach will involve engagement with many different private landowners, and some may regard this as a barrier in terms of the capacity required. However, Links' view, from working with thousands of landowners across the country, is that farmers and private landowners are very open to protecting and enhancing the natural environment where this makes business sense (i.e. where land can still be managed productively and profitably, and where taking action for the natural environment is not a significant financial drain). Given the right incentives and advice much can be achieved. Link therefore supports recommendation 18 of *Making Space for Nature*, which proposes that the "Government needs to establish a consistent, integrated and long-term expectation of land managers to deliver parts of the ecological network" and recommendation 20, which states that "Government should consider extending tax incentives to encourage landowners to make long-term commitments to the creation of new wildlife habitats that benefit ecological networks.

- **Demand for cheap food, poor farming returns and increasing intensification**

For too long there has been an artificial divide between the role of farmland in producing food and its role in supporting biodiversity and providing other environmental and ecosystem goods and services. Incentives and drivers to boost food production have come at a cost to environmental and landscape quality and wildlife, and it is time to address this market failure to reward the delivery of environmental goods. Reforming the CAP to ensure all payments are conditional on the delivery of public goods would in effect correct this market failure, incentivise delivery of those goods and contribute to the income of farmers.

Measures must also be taken to ensure the marketplace provides farmers with a fair price for their commodities. In addition, the true costs of production should be internalised into the price of food, e.g. negative externalities arising from conventional production: greenhouse gas emissions, soil and water degradation etc. If these were internalised, more sustainable methods of production would become more economically viable and attractive for farmers. As the price of food is a sensitive issue, measures would need to be taken to ensure the poorest sections of society were still able to access adequate amounts of nutritious food.

- **Lack of good quality advice and support in the land management process**

Local authorities have widely variable capacity to address issues relating to the natural environment. Government encouragement for strategic planning, mentioned above, may in many cases help to address this. The recent production of standing advice by Natural England on protected species may well help with regard to planning cases where species issues are raised. It is important that such advice is backed up, once again, by a robust body of evidence, and the influence of such advice on planning decisions needs to be monitored.

- **Short-termism**

Governments sometimes expect short-term conclusions and results from environmental policies within the electoral cycle. The environment cannot, however, be expected to deliver in this way. It is essential to take account of ecological timescales, which can often be long-term. Both political cycles and funding sources must recognise the need to invest in action now for outcomes in the future. Funding streams need to provide support beyond 3 year periods to sustain action and allow monitoring to begin. In this context, we have been pleased to hear pronouncements by the new Defra ministerial team that they understand the need for long-term thinking when framing policy on the natural environment.

Question 13: What are the barriers to thinking big and taking a landscape scale approach to managing our natural assets?

Link has developed a range of principles which would determine the success of a landscape scale approach.²⁰ However, the barriers for ensuring these principles are highlighted below;

- **Working within administrative boundaries**

The natural environment does not follow administrative boundaries, and our efforts to think big and take a landscape scale approach to management of the natural environment will be constrained if we work only within local authority boundaries. The *Making Space for Nature* report, for example, recognised that consideration of ecological networks would be best achieved within larger areas, and suggested National Character Areas as a suitable scale. We believe that an overview within ecological boundaries at a supra-local spatial scale would address this, empowering us to think big and catalyse working at a landscape scale, hence the suggestion of Local Natural Environment Recovery Groups in section 3.4.4 above.

- **Lack of understanding**

A current lack of understanding among the public, landowners and managers and decision-makers about the need for and value of landscape-scale conservation is a significant barrier. Many people still believe that nature conservation is, and should be, confined to specific reserves or places of high wildlife value. For example, many people do not appreciate that river basins are not just rivers and that not all the associated processes and assets are water-based. However, Link members are working in partnership with landowners, organisations and communities to link and connect these areas into ecologically functioning networks and improving the permeability of the rest of the landscape. Until understanding of the need for landscape-scale conservation and the benefits to be accrued increases, there will still be opposition to using natural solutions to manage issues such as flooding and coastal re-alignment. The White Paper must place a clear focus on the importance of landscape-scale conservation.

- **Lack of funding**

One of the significant barriers to taking a landscape-scale approach is lack of funding opportunities. A key reason for the landscape-scale approach is proactive restoration of the natural environment. However, alongside few legislative provisions for delivery of ecosystem

²⁰ http://www.wcl.org.uk/docs/Link_LSC_position_draft_V3_Dec09.pdf

function and insufficient powers for restoration, there is also little funding available. Many funding streams that do exist are silo-based – even within Defra and its agencies. This results in limited opportunities and incentives for landowners to work together at a landscape scale. In addition, most funding is time-limited. For landscape-scale conservation, it may take considerable time for some of the benefits to materialise.

As with the previous question, insufficient incentives, information and advice are barriers to taking a landscape-scale approach. The support for more integrated approaches at a local level and the development of new, innovative funding mechanisms, e.g. through the water price review, biodiversity off-setting and payments for ecosystem services, will make a useful contribution to the restoration of the natural environment. However, in addition to these mechanisms, greater progress must be made in increasing the understanding of the value of the natural environment across Government Departments, to release funding which will help meet multiple objectives.

Question 14: What should be the priorities for the UK's role in EU and international action, to protect and enhance the natural environment at home and abroad?

As mentioned above, the UK Government has a responsibility to show strong leadership both on the international stage and at home, particularly if it is to fulfil its pledge to be the 'greenest Government ever'.

The UK could increase its leadership within Europe and globally through the action it takes at home, and in the support it offers internationally on climate change and biodiversity restoration. In particular, it should support action to reduce the degradation and destruction of forests (as a key contributor to greenhouse gases) and increase the recognition of the key role of biodiversity in climate change mitigation and adaptation.

By implementing the recommendations of *Making Space for Nature* and by developing a new statutory national spatial and strategic framework to drive integrated decisions about land use and land management to achieve ecosystem recovery, the UK also has the opportunity to lead the world in restoring the natural environment.

- **UN Conventions**

The Government should engage fully with the Convention on Biological Diversity (CBD), the Convention to Combat Desertification (CCD), the Aarhus Convention and CITES. Defra should also work to ensure that all of these processes, and the UNFCCC and Millennium Development Goal (MDG) processes, are joined up and make the links between environment, biodiversity, climate change and poverty.

- **Rio +20**

Defra should be fully engaged in the build up and summit for Rio + 20 and use this opportunity to promote action for sustainable development within the UK Government, the EU and internationally.

- **Millennium Development Goals**

Defra could provide evidence and support on MDG 7, 'ensuring environmental sustainability', and help make the case to DfID, the EU and other countries that environmental sustainability underpins all the MDGs and that without it development progress will be quickly undermined.

- **EU Budget 2014-2020**

The review of the next European budget 2014-2020 (around €1000 billion of taxpayers' money) provides a massive opportunity for Defra to protect and enhance the natural environment at home and abroad. Getting a good deal for the natural environment from this budget should therefore be a priority for the UK's role in EU and international action.

- **Common Fisheries Policy reform**

Fundamental and progressive reform of the Common Fisheries Policy (CFP) is critical, to deliver an ecosystem-based approach to the management of fisheries – ensuring that every fishery must develop and operate under a long-term management plan (LTMP) which is consistent with achieving recovery of fish stocks and marine ecosystems and therefore Good Environmental Status under the MSFD.

- **OSPAR Convention**

The UK Government should take a leading role in achieving the objectives and targets of the OSPAR Convention for the Protection of the Marine Environment of the North-East Atlantic, including new targets for designating an ecologically coherent and well-managed network of MPAs by 2012. A coordinated approach to target setting and monitoring under the OSPAR Convention will help deliver the requirements of the EU MSFD for marine regions.

- **Common Agricultural Policy reform**

We have referenced this in a number of places in our response, and it is clearly a key area for international leadership by the UK. The Government must ensure that the CAP is reformed in such a manner post-2013 so as to enable rather than inhibit the delivery of the White Paper.

- **Invasive non-native species (INNS)**

Invasive non-native species (INNS) are the second biggest threat to global biodiversity after habitat loss. Prioritising action to tackle INNS in the UK, the EU and beyond is therefore crucial if biodiversity decline is to be halted, commitments to binding instruments (e.g. the Convention on Biological Diversity) are to be fulfilled, and severe economic consequences are to be averted (in the EU alone, damage caused by INNS is currently estimated to cost at least €12 000 million per year). In the EU, the failure of any one Member State to take coordinated action on INNS puts the natural environment of the entire Community at risk. Research commissioned by the European Commission shows that, currently, domestic arrangements across EU Member States are increasingly varied, disparate, and generally ineffective. Therefore, any piecemeal gap-filling approach to INNS legislation would be prohibitively complex and problematic to enforce. Strong EU legislation that guarantees a minimum standard of provision across the EU is required. The Invasive Non-native Species Framework Strategy for Great Britain was commended recently by the European Environment Agency as ‘an outstanding example of Government commitment to tackling biological invasions’. Government can cement its reputation as a fore-runner in this field by showing its support for the introduction of a dedicated EU legal instrument as an immediate priority, to ensure Member States adopt a consistent approach towards tackling this issue.

- **Enforcement of CITES and retention of the moratorium on commercial whaling.**

The Government must continue to maintain implementation and enforcement of the Convention on the International Trade in Endangered Species (CITES), both in the UK and abroad, as a priority. It should work to set an example in wildlife crime enforcement by ensuring that the National Wildlife Crime Unit and Metropolitan Police Wildlife Crime Unit retain their funding in order to remain effective, and make efforts to support the environmental crime programmes of INTERPOL, United Nations Office on Drugs and Crime (UNODC) and the World Customs Organisation.

The Government must continue to play a leadership role in the International Whaling Commission (IWC), to ensure continuation of the moratorium on commercial whaling and an end to self-allocated commercial whaling by countries including Japan, Norway and Iceland. It must ensure that priority is given to the development of the IWC’s work to address the environmental threats to whales, dolphins and porpoises effectively.

Similarly, the UK should continue to support and champion the Convention for Migratory Species (CMS) and its various daughter agreements which cover wildlife conservation in Europe and beyond.

With respect to other multilateral environmental agreements (MEA), including but not limited to CITES, the IWC, CMS and climate change agreements, the Government must continue to play a leadership role to protect the global environment and threatened species. This includes maintaining a leadership role within the European Union where an EU common position is required.

The obligation of EU member countries to achieve a common position for decision-making at MEAs is proving problematic to the environment and species, as the lack of this common position results in abstentions by EU members en bloc in these fora. With the expansion of the EU it is becoming increasingly difficult to achieve common positions on critical issues.

With respect to EU decision-making, the Government should make every effort to change the EU process that results in EU voting abstentions in MEAs because a common position cannot be reached. The Government's leadership is urgently required to avoid abstention votes in MEAs on critical decisions which will then result in a detrimental outcome for the environment and species. One option that could be explored is that in the event that a decision cannot be reached, the precautionary principle should apply.

- **A funding system to enable effective implementation of the UK Overseas Territories biodiversity strategy.**

The 14 UK Overseas Territories (UKOTs) are home to a remarkable range of biodiversity, including well over 500 species found nowhere else on earth. Their unique habitats are equally significant, including the world's largest and most pristine coral atoll (Great Chagos Bank), and perhaps the most important seabird island on the planet (Gough Island). Much of this biodiversity is under severe threat: 96 species are classified as critically endangered (compared to just 14 critically endangered species in the metropolitan UK). The last UKOT extinction occurred as recently as 2003 (the St Helena olive), but this threatened wildlife is still too often overlooked. In 2008/09, only 0.04% of Defra's conservation spending went to the UKOTs, the equivalent of just £1,860 per critically endangered UKOT species.

Legal responsibility for protecting the threatened biodiversity of the Overseas Territories falls to the UK. The small, isolated communities of the UKOTs do not have the financial resources or the capacity to protect their vulnerable wildlife. As UK territory, they are ineligible for many of the international environmental funds normally open to small-island states, but at the same time are excluded from much UK funding due to their location. Action must be taken to ensure they no longer fall into this funding gap. In December 2009, Defra published a UKOT Biodiversity Strategy, recognising the urgent need to halt the ongoing decline. The implementation of this strategy should be one of the UK's highest priorities. A programmatic funding system, co-ordinated by Defra, is required in order to achieve this. The RSPB commissioned an independent study which concluded that £16 million p.a. over 5 years is required to address the UKOTs' urgent conservation needs. This would represent some of the most cost-effective conservation possible, saving numerous threatened UK species from the threat of extinction and demonstrating on the international stage that the UK is willing to protect its own endangered wildlife.

Question 15: If you could choose just one priority action for the Natural Environment White Paper to drive forward locally, nationally or internationally – what would it be?

There is no single action which would solve the complex problems the natural environment faces because of decades of inaction, insufficient political will and other social and economic

changes. The White Paper, however, undoubtedly represents a great opportunity to set a new direction.

Fundamentally, how the Government operates and how the economy is managed at different levels (global drivers, national priorities and local delivery) both require substantial change and re-gearing if nature is to benefit and if the effort and funds which Government and society put into current conservation activity is to be productive and effective. This might allow us to feel that one step forward no longer feels like small incremental change which results in two steps back. There is a need to bring land and sea use and management decision-making together under one strategic, unified and visionary approach. This will include embedding the landscape-scale conservation (or ecosystem-based approach at sea) ethos in *all* Government policy and activity, including statutory funding mechanisms.

Starting points for the Government's route map would be:

- Full adoption of the recommendations of *Making Space for Nature*;
- Restating the commitment to genuine sustainable development as the framework for action;
- A national plan for recovery from the recession which fully incorporates the new thinking and commitments to enable rapid action on UK and global natural environment and biodiversity restoration which are required; and
- Prime Ministerial leadership on the role of all Whitehall departments to commit to their role in protection and enhancement of the natural environment.

There should also be clear roles for local authorities and any partnerships involving local government so that they contribute strongly to local, sub-regional and national delivery.

In sum, the Natural Environment White Paper must drive forward a national overarching vision and strategic framework for the restoration of the natural environment that is the responsibility of all levels of government, as well as wider Civil Society and communities and individuals up and down England. There should be a requirement within this framework to identify Ecological Restoration Zones and a duty on local authorities to bring together partnerships at the appropriate sub-national and local level and to cooperate across administrative boundaries. Communities will be empowered to deliver within the national framework. This will ensure that whole landscapes and ecosystems are restored so that we can withstand climate change.

