

Informing Defra spending decisions Wildlife and Countryside Link submission July 2010

amphibian and reptile
conservation 



Bat Conservation Trust 



**Campaign to Protect
Rural England**



**National
Trust**



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1. Introduction

Wildlife and Countryside Link (Link) welcomes the opportunity to present its thoughts on how Defra might be able to reduce its budget whilst supporting key aims outlined in the coalition agreement¹.

Link understands the new coalition intends to make far-reaching decisions about where the axe should fall on public spending. Government understanding that a healthy natural environment is not a luxury and is fundamental to human existence and progress will be key to creating a truly sustainable recovery and society.

1.1 Ambition

To make early progress on its commitment to being “the greenest government ever” the coalition Government should demonstrate how it is taking its environmental responsibilities seriously. Link’s early contribution to assist the coalition to meet its stated commitment, is to identify areas of expenditure which we believe are crucial to the attainment of the coalition’s ambitions and areas which we think are less essential, and to offer our thoughts on how Defra’s objectives might be delivered differently through a partnership with civil society.

It is essential that a White Paper on the restoration of the natural environment and ecosystems is adequately resourced. There is a need for greater integration across a range of policy areas affecting how land is used and managed and a more landscape scale (spatial) approach to decision making if species and habitat declines are to be halted and healthy ecosystem function is to be restored. This should be reflected in Defra’s new business plan. We also expect Defra to play a proactive role in the Greenest Government Ever committee, led by Chris Huhne.

1.2 Underpinning

Degradation of our natural environment directly affects the services which it provides - from clean air and water, flood alleviation and crop pollination to soil fertility and carbon sequestration - with growing and obvious evidence of significant detrimental impacts on the economy and human well-being. We also risk losing something that is more difficult to measure, but of equal importance – the inspiration and learning provided by contact with nature.

1.3 Proportionality

Defra accounts for just 0.5% of total government spending; Ministers should be wary about taking the axe to such a small budget that is already thinly spread, and struggling to protect wildlife and landscapes that millions of people enjoy and, indeed, depend on.

¹ Stated in the coalition agreement; Maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs – to protect green areas of particular importance to local communities; Introduce measures to promote green spaces and wildlife corridors to halt the loss of habitats and restore biodiversity; We will take forward the Marine and Coastal Access Act and ensure that its conservation measures are implemented effectively
http://www.cabinetoffice.gov.uk/media/409088/pfg_coalition.pdf

1.4 Responsibility

The state has a vital role to play in securing the benefits freely provided by our natural environment, through its leadership role, and through the use of the full range of policy and funding instruments. It also has obligations and responsibilities to ensure that biodiversity and environmental regulations originating from global, European or national legislation are upheld and implemented. Furthermore, it has a vital leadership role to play in Multilateral Environmental Agreements².

1.5 Ideas

We believe our suggestions offer the potential for significant savings, but only if our involvement and advice is sought and valued early in the process. These savings, when coupled with the additional benefits of exploring or streamlining various processes, and combined with a new more rigorous approach to encapsulating the inherent value within natural systems, offer tangible benefits in terms of helping Defra deliver on its core objectives and those of the Government.

2. Principles for decision making

We offer the following principles to help guide decision making in allocating public spending:

2.1 Frontline services – the natural environment is the ultimate frontline service. It underpins a safe and secure society, and economic activity. There is untapped potential to deliver more through the “environmental services” that nature provides but which are not fully recognised or rewarded - quality of life, recreation and learning, “natural health service”, clean water, carbon sinks, flood management, community cohesion, volunteering, and resilience to climate change³.

2.2 Payment for Ecosystem Services – there are opportunities to explore new ways to support ecosystem service delivery. These might include the development of markets to support environmental services and opportunities should be maximised to complement necessary publicly-funded delivery.

2.3 Better regulation – investment is needed to ensure regulation is implemented effectively. Where incentives are removed smarter regulation will be needed to ensure the continued delivery of public benefits. The quality not the quantity of regulation is what counts.

2.4 Integrated delivery – in times of financial stringency joined up working is especially essential. The Government should use the incentives which it and the EU can provide to promote synergistic working whenever possible, making the most of every public pound spent.

² Multilateral Environmental Agreements, including but not limited to, the Convention on International Trade in Endangered Species, the International Whaling Commission, the Convention on Biological Diversity and the Convention on Migratory Species.

³ A key argument which is comprehensively made by The Economics of Ecosystems and Biodiversity programme led by Pavan Sukdev and National Ecosystem Assessment state that “By 2050, the costs of not halting biodiversity loss would be equivalent to a staggering US \$14 trillion per annum, or 7 percent of global GDP”.

2.5 Consistent progress – the environmental decline being witnessed requires concerted action. The Government must value and support key agencies properly and fully. Natural England achieves a great deal in a cost-effective manner (despite having been under almost constant change since its creation). The Environment Agency, while often chiefly noticed during times when severe floods threaten communities, also deserves applause from Ministers for its important day-to-day work.

2.6 Genuine involvement – We welcome the Government’s stated commitment to genuine full consultation which will be essential to work through the implications of spending savings and how to find improved ways of delivering essential services. This will also enable the NGO sector to plan and accommodate what it can, given that the economic downturn has and continues to affect our capacity. It should be recognised that NGOs have their own constraints including their charitable objectives.

2.7 Sustainable recovery – all parts of society need to work together to deliver truly sustainable development. This will be central to the new economy, recovery and social progress and we look to the Government to articulate this in its decisions and through its work.

3. Front Line Services which need to be protected

We believe the following areas of spend are crucial to achieving our collective ambitions for the natural environment – these are our “red lines”. We urge Defra to protect these budgets.

1. The Government’s role in identifying, protecting, managing and monitoring protected areas and species on land and at sea, such as National Parks, AONBs, SPAs, SACs, SSSIs, MCZs and European protected species, including action to halt and reverse the decline and secure the conservation of UK BAP listed species and habitats. The Government also has a crucial role in protecting and enabling the recovery of threatened species and habitats outside protected areas.
2. Higher level agri-environment schemes and other land management grants sustained at no less than current levels and targeted to support land managers delivering public goods such as an attractive countryside rich in wildlife accessed by all.
3. The Government’s role in gathering evidence about the state of the countryside and our marine environment. Research and monitoring ensures that most effective policies and practices are implemented and that money is not wasted on ineffective approaches.
4. Rights of way and access to the countryside including establishment of a coastal trail.
5. Nature conservation in UK Overseas Territories and in developing countries, not least tropical forests.

4. Different ways for delivering Government's natural environment objectives

Whilst there are difficult decisions to be made, the Government now has an opportunity to deliver more creatively, effectively and efficiently, and invest public money in ways that bring much greater benefit for people today and in the future, from a healthier natural environment in both town and country. The prize is to make real and lasting connections between people's health and wellbeing and the quality and accessibility of their environment, on their doorstep and in the wider world and to increase respect for and understanding of the natural world for its own sake. We make some suggestions below on ways in which this might be achieved.

1. **Civil society delivery** - certain areas of work currently undertaken by Defra, and the statutory organisations they fund could be carried out cost effectively by NGOs. As and when ideas emerge, we recommend early dialogue with Link members to understand the funding and structural implications of proposed arrangements including ensuring that the voluntary nature of many Link members' activities is properly valued.
2. **Create markets for ecosystem services** - there is great potential for creative measures to pay farmers and land managers for providing environmental services. By aligning public and private investment from water companies, flood risk management, the health service and a new carbon market as well as better support from farm payments we can secure a better return on existing public investment and move towards a more sustainable future for land use.
3. **Use the natural health service** - the value of contact with biodiversity-rich green space in maintaining physical and mental well-being is increasingly recognised. Investment in new green space should form part of government's preventative healthcare strategy. At a time when the total cost of mental healthcare in England alone tops £40 billion a year, and that of physical inactivity over £8 billion a year, we believe the outdoor places we look after represent a huge opportunity. In short, a potential national network of under-utilised, low-cost, inspiring and highly effective outpatient facilities, just waiting to be used.
4. **Polluter pays** - apply the polluter pays principle as a means of raising new revenue for supporting nature conservation e.g. through exploring new measures such as an effective conservation credits system.
5. **Target agri-environment** - improve effectiveness of existing agri-environment schemes; ELS can be a valuable tool for delivering benefits for widespread species. However, it is currently spread too broadly and too thinly. A more tightly targeted scheme, focussed on a smaller number of higher wildlife value options, would produce much better results. Effectively targeted HLS will also be needed to underpin the future management of our highest quality environments, particularly the delivery of nature conservation outcomes.
6. **Focus on upstream solutions** – increase the focus of water management policies and agri-environment spend on upper catchments and smaller waters (headwater streams, ponds, ditches) to deliver freshwater ecosystem

services, biodiversity and statutory gains. Inclusion of smaller waters offers the potential to re-establish clean, unpolluted water as a common feature across many landscapes.

7. **'Biodiversity proofing'** - all existing money that is provided for the natural environment, including carbon schemes (from government schemes/agencies/ grants etc) should be required to demonstrate that it will benefit the widest range of priority and declining species and habitats for the long term.
8. **Routes to public benefit** - encouraging highway and access authorities to share best practice on the sensible use of resources so as to deliver greater public benefits (these could include information sharing and collective purchasing for systems, software, etc). Also, implement Natural England's Stakeholder Working Group's recommendations on recording rights of way, *Stepping Forward*, to streamline and remove the controversy from processes for claiming unrecorded public paths, saving time and expense for Defra and local authorities.
9. **Natural action on climate change** - embedding the conservation of the natural environment, such as woodlands, peatlands and grasslands, as a major part of the climate change solution package, through close working between Defra and DECC.

5. Areas of Defra spend where efficiencies might be found

We believe that efficiencies might be found in the following areas:

1. **Rural spending** - thorough review of money allocated through Axis 1 and 3 of the Rural Development Programme for England to ensure this spending is genuinely delivering public goods.
2. **Biodiversity process** - the current process-heavy biodiversity process could be streamlined by focusing more on delivering biological outcomes – the original intent of the BAP when established in 1994. Our views in shaping this process are critical.
3. **Architecture of government** – we believe that efficiency savings can be found around Defra's suite of agencies and the architecture of government. We would welcome early conversations with the NGO community to ensure that our experience of working with the statutory agencies and our thoughts on areas where savings could be made are taken into account.
4. **State ownership of land** - the recent Public Forest Estate Working Group report submitted to the Forestry Commission's England National Committee is due to be sent to Ministers shortly. This makes some recommendations about the future of the public forest estate e.g. a greater focus on a smaller number of key outcomes and less expenditure on major leisure investments; it also makes it clear that using asset sales to cover running costs and short-term financial challenges is not a long-term sustainable option.

We agree that state-owned land should be reviewed to ensure that it is delivering public goods cost-effectively; e.g. there may be merits in selling commercially valuable forestry which offers minimal public benefits, provided those funds are re-invested in delivery of public goods not in reducing the public deficit. Outsourcing the management of other state-owned land to credible nature conservation NGOs is a possibility but may well be a cost-neutral option once the implications of such transfers are fully reviewed.

If this is considered a viable option, Link members would welcome early dialogue with Government to consider the conditions on any such arrangement.

5. **Suspend Review** - put on hold the planned review of town and village green legislation as there is no evidence that it is flawed.
6. **Badgers and Bovine TB** - while we appreciate the concern in the farming community about bovine TB, we propose that any wildlife control measures to tackle this issue should be subject to detailed cost/benefit analysis based on scientific evidence and the Independent Scientific Group (ISG) criteria.
7. **Fisheries** - all Environment Agency work on managing freshwater fisheries and fishing licences should be covered by fishing licence fees - £9.4 million saving⁴. All IFCA and MMO work on the management of sea fisheries could be funded by industry. In addition, a licence could be imposed upon the sea angling community similar to that of freshwater angling.
8. **Departmental realignment** - bringing planning and environment back together could deliver long-term savings, as well as better policy integration (for example the Government is going to want to integrate its planning reform agenda with the Natural Environment White Paper, and this would be easier if the same department dealt with both issues).

Wildlife and Countryside Link
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⁴ Based on 2008/2009 figures

About us

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 have the support of over 8 million people in the UK and manage over 690,000 hectares of land.

This response is supported by the following 28 organisations:

- Amphibian & Reptile Conservation
- Badger Trust
- Bat Conservation Trust
- 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
- International Fund for Animal Welfare
- The Mammal Society
- Marine Conservation Society
- National Trust
- Open Spaces Society
- Plantlife International
- Pond Conservation
- Ramblers
- Royal Society for the Protection of Birds
- Royal Society for the Prevention of Cruelty to Animals
- Shark Trust
- Whale and Dolphin Conservation Society
- Wildfowl & Wetland Trust
- The Wildlife Trusts
- Woodland Trust