

# The 25 Year Environment Plan: One year on

## A Wildlife and Countryside Link report



Wildlife and  
Countryside



[www.wcl.org.uk](http://www.wcl.org.uk)



## Executive summary

The Government rose to the challenge of our nature emergency in its 25 Year Environment Plan, showing significant green intentions, including tackling pollution, protecting and enhancing wildlife and delivering a more sustainable farming system, to name but a few. But with the UK one of the world's most nature-depleted countries, rapid and effective delivery of the Plan is essential for the recovery of our struggling environment and wildlife.

In the first year since the Plan was published we have seen strong and encouraging announcements emerge from Defra in a range of areas, such as resources and waste, net biodiversity gain and nature recovery networks. However, questions still linger over whether the funds, legal underpinning, binding targets and enforcement, needed to make these plans a reality, will be forthcoming, and whether delivery will happen quickly enough to stop the countdown to environmental disaster.

During its second year, we need to see the Plan underpinned in law by a strong Westminster Environment Bill, with ambitious targets for nature's recovery and a powerful green watchdog with real bite. The Treasury must commit to finding funds to match the Plan's ambitions, not least after years of cuts to biodiversity conservation funding.

With just over a decade to avoid an irreparable worldwide climate change tipping point, global action is also vital to meet the Plans objectives. The Government's ambition to play a leading role in restoring the environment globally is welcome, particularly as 2020 will see landmark global summits on the climate and biodiversity. But this ambition abroad must be backed up with action at home, to legislate through the Environment Bill to lock in binding commitments to reduce our global carbon and environmental footprints.

Given the urgency in tackling nature loss and environmental decline, effective monitoring and reporting of progress against this England- focused Plan, and coordination between the four nations' Governments, is key to keeping action on track to meet environmental need across the UK. The Government must also continue to keep its ears and minds open to include the voice of youth in the development of environmental policy, which will of course affect young people the most.

In short, we applaud the Government for devising the 25 Year Plan. Now the challenge for Government is to put this Plan into practice, through a combination of strong laws and governance, sufficient funding, effective local action and global leadership. This is no mean feat, but in this way the Government will secure the Plan's ambition and really leave our country's environment and landscapes fit for both people and nature for generations to come.



## A welcome plan becoming reality?

The [25 Year Environment Plan](#) signalled a significant increase in Government ambition for the environment in England. It recognises that a safe climate and a biodiverse natural environment underpins economic, social and development aims, whilst also committing Government to reducing the UK's global footprint. The Plan sets out a long-term trajectory for meeting Government's promise that this would be the first generation to leave the environment in a better state than it inherited it.

This report reflects on progress made in delivering the Plan over the past year, drawing on the Government's own first annual 25 Year Plan [progress review](#), published in mid-May.

When the Plan was first published, we celebrated its charting of a more sustainable path at a time of political turbulence, a context which has arguably become even more uncertain since. Greener UK's quarterly [Risk Tracker](#), which assesses the risk Brexit poses to different areas of environmental protection, now rates every area of the environmental policy as red - "high risk" - a result attributed to the uncertainty over the outcome of Brexit, and the possibility of "No Deal".

Over one year on, the 25 Year Environment Plan remains an important signal of the UK Government's green intentions, with implications across Government and society. The Plan promises to tackle long-term environmental declines - as highlighted by the [State of Nature Reports](#) - as well as issues with a high public profile such as plastic pollution. But with nature continuing to diminish at [rates unprecedented in human history](#), is Government doing enough to turn the 25 Year Plan promises into reality?

## A context of environmental crisis

The UK Government's own most recent [report](#) to the United Nations shows that - despite promises prompted by the failure to achieve our Biodiversity 2010 targets - the UK will miss 14 out of the 19 global biodiversity goals for 2020. The UK is still failing to halt biodiversity loss and indeed, in many cases the rate at which species and habitats are disappearing is increasing. MPs have recognised the crisis our natural world is facing, recently voting to declare an environment and climate emergency. However, this has not triggered the radical action that an emergency deserves.

The 25 Year Environment Plan promised to turn around the environment's fortunes. However, the existence of the Plan alone is not enough, we need Government to prove that these are not empty promises. It is time to turn the commitments in the Plan into sustained, positive outcomes for nature.

Although the aspiration to restore the natural environment for the next generation is commendable, in many areas the actions outlined in the Plan are insufficient to achieve this ambition. Government have stated in their own progress report that 90% of priority actions have been delivered or are on track. However, if these actions will not be enough to achieve the overall goal of recovering nature and improving the environment, a review of how we are going to achieve that goal is urgently needed.





# The wider conditions needed for the Plan to work

## Real-world delivery - not just process



Many proposals in the 25 Year Environment Plan are not yet underway. On the one hand, this is understandable, since it is only 17 months since the Plan was first published. However, if the Government is to stand any chance of achieving its ambition to protect and restore the environment for future generations, it needs to plan based on evidence and take rapid action to get on the path to environmental recovery. This will create the impetus and certainty which business sectors and society as a whole can, and will, follow.

## New laws and enforcement

The 25 Year Environment Plan is very ambitious. However, it currently lacks any repercussions for failure to achieve its goals. In the past, we have seen voluntary targets such as those in the 25 Year Environment Plan fail to have any true impact. They have tended not to influence Government departments beyond Defra and have been overlooked for funding. Last year we therefore welcomed the Prime Minister's announcement of a new Westminster Environment Act which will set out a legal framework to underpin the 25 Year Environment Plan, committing Government to acting.

In order to give our wildlife the protection it needs, the Bill should introduce an overarching duty on all public bodies to secure the maintenance, recovery and restoration of the environment, and a duty on the Secretary of State to set legally binding targets for nature, with five-year milestones to help keep progress on track. Transparent and honest reporting is vital. The updated indicator framework, published alongside the annual report, must monitor progress towards achieving these targets and be reported on annually. Both must be scrutinised by parliament.

The Bill must also create a new green watchdog that is independent and strong enough to ensure that environmental laws are not ignored or broken, and which can hold Government to account for delivering on its commitments.

## Resources

Even with the right political will the Government will only succeed in recovering nature if positive funding mechanisms are in place. Yet during the last decade UK Government investment into biodiversity conservation has been [reduced by a third](#). Government's rhetoric on the environment has often been lofty, but its own [report](#) to the United Nations concedes that it will fail to meet [global targets](#) to curb the loss of species and ecosystem services by 2020.

Whilst regulation and incentives can stimulate positive change, this is only effective if Government oversight bodies are adequately resourced. It is widely accepted that Natural England is provided with insufficient resources to undertake its statutory duties. The slowness of progress towards achieving good ecological status in waterbodies, absence of a programme to actively review abstraction limits, and lack of biodiversity conservation activity suggests that the Environment Agency is also now unable to take sufficient action to reverse environmental decline.



[Analysis](#) by the RSPB, the National Trust and the Wildlife Trusts has shown that maintaining current levels of spending on the environment would merely allow existing environmental outcomes to be met, at best. As well as existing Government funding, there are three likely additional sources of future money for delivering for the environment: money from developers to deliver biodiversity net gain; Government funding for positive land management practices under the new Environmental Land Management system; and private finance. However, these sources alone will be insufficient to fully achieve the ambitions of the 25 Year Environment Plan, as commitments such as the delivery of a “Nature Recovery Network” and the recovery of threatened species currently lack clear funding streams.

Many projects highlighted in Government’s own report to the UN were funded by the EU. Natural England recently published a [report](#) which emphasises that this nature funding from the EU is unique. All four Governments of the UK must commit to a new dedicated biodiversity fund post-Brexit - akin to the EU LIFE fund, but over and above in terms of scale.

Government must undertake a detailed assessment of both the costs and benefits of achieving its environmental goals, particularly in cases where the avoidance of costs can be achieved alongside benefits for the environment – for example Natural Flood Management.

Attention should be paid to Natural Capital Committee recommendations, and to how existing funding mechanisms might be improved. Particular attention should be paid to the use of new technologies that could offer savings, improved services, or new funding streams. Finally, local authorities should be required to include an environmental services precept within Council Tax, incorporating surcharges or discounts as appropriate.

The 25 Year Environment Plan commits UK Government to explore new funding mechanisms, including from private sources, and in particular to assess the potential for a natural environment impact fund. However, it is not clear what, if any, progress has been made on these proposals to-date.

### **Effective environmental monitoring and data management**

The UK currently lacks a coherent infrastructure to support the collection, management, access to, and effective use of environmental data. This is symptomatic of the lack of suitable funding mechanisms for monitoring, meaning that in many cases an absence of data is preventing us from knowing the true state of the environment. For example, last year it was revealed that almost 50% of Sites of Special Scientific Interest have [not been monitored](#) in the last six years, and less than 39% of [Local Wildlife Sites](#) were monitored in the last five years. Inadequate enforcement of obligations for those responsible to act on such information further contributes to the problem.

Changes within the existing system would not only prompt wider use and collection of important data, resulting in better outcomes and better more effective services, but it would also reduce delays and spread costs more equitably for commercial uses. This in turn would open up new possibilities for educational, conservation and wider public use, and could be combined with the adoption of new technologies – for example, satellites or eDNA - in combination with established approaches and citizen science initiatives.





It is important that monitoring be undertaken at a resolution appropriate to the objective, and that data are collected and held in standard formats to facilitate combination, reuse, and scaling up from local delivery to regional, country or UK level targets. The interests and business models of data collectors, managers and users' needs to be more thoroughly explored in order to inform a coherent national biodiversity monitoring strategy.

### **Cross-Government and cross-UK**

In order to achieve the commitments made in the 25 Year Environment Plan it must be owned by the whole of Government. Effective delivery of the Plan will require many departments of Government, and public authorities, to play an active role. There needs to be greater scrutiny of how the actions and decisions of Government departments other than Defra are contributing to the Plan's goals, and where they are undermining them.

Nature does not respect national boundaries and it is in decline across the whole of the UK. The Government in Westminster needs to work as closely as possible with devolved administrations to deliver a shared vision and action for the environment.

### **Coordinated and joined up policy development**

The 25 Year Environment Plan has resulted in a flurry of new policy ideas and frameworks which will only be effective if they work together. For example, the new Nature Recovery Network might in part be delivered by the new Environmental Land Management and Biodiversity Net Gain systems. However, this will only happen if these policies have governance frameworks that are coherent and joined up, including clarity on whether and how much one is expected to contribute to and fund the

## **Where are we now**

We recognise the positive action to improve the environment that has been taken since the 25 Year Environment Plan was published last January. However, more work is needed if the Plan is to be truly transformational. Below are some of the initiatives that Link members have welcomed over the past year, along with steps Government now needs to take in order to leave a legacy of which it can be proud.

### **Resources and Waste**

Actions to '*Continue to implement the Litter Strategy to reduce plastic litter and littering behaviour*' are a welcome first step towards improving recycling and reducing litter. We note for example that the Plan rightly points to the success of the 5p plastic bag charge in reducing the use of carrier bags by 83%. However, if as the Plan claims, and is desperately needed, the '*focus will be on preventing waste arising in the first place through better resource management,*' then there is still a long way to go.

For example, in addressing the source of waste, litter and marine pollution, we would like to see the introduction of an integrated, comprehensive suite of measures to adopt circular economy approaches, reducing waste at source and so preventing litter. This would include a transfer of the cost of managing packaging waste to producers to incentivise and encourage reduction, reuse and recycling and phase out non-recyclable materials that are most prevalent in the marine environment.



It would also involve the introduction of coherent and comprehensive deposit return schemes for drinks containers across the UK, measures to reduce marine litter from the fishing industry, which should include waste management on board and waste management in harbours and operational losses/net cutting leading to ghost gear. The Government should also encourage fishing for litter initiatives, removing barriers to the processing or adequate disposal of marine litter collected, by ensuring that vessels can land non-operational waste collected at sea at any participating harbour at no extra cost.

Link coordinated the development of a [position paper](#) earlier this year setting out how the Government can enable a ‘wholesale transition away from our single-use plastic culture, with all but the safest and most essential single-use plastics to be phased out by 2025’. We urge the Government to follow our recommendations for this transition.

### **Biodiversity net gain**

The 25 Year Environment Plan commitment to introduce a mandatory system of biodiversity net gain - in which developers are required to leave biodiversity in a better state than before - has the potential to significantly improve the way nature is treated by the planning system. However, this will depend heavily on its ability to optimise potential benefits and minimise potential risks, following the mitigation hierarchy.

We welcomed the Chancellor’s statement confirming that biodiversity net gain will be included in the forthcoming Environment Bill, as well as the collaborative approach Defra has taken in developing this initiative, bringing together stakeholders from both the environment and planning sectors to discuss proposals. However, it remains to be seen whether a workable system will be developed that truly delivers for biodiversity, communities and developers. We urge the Government to draw from our [net gain principles](#), and ensure that measures to address existing and potential barriers are discussed with all key stakeholders.

### **Nature Recovery Networks (NRN)**

When the 25 Year Environment Plan was published we welcomed its commitment to developing a Nature Recovery Network (NRN) to “protect and restore wildlife”. This is reminiscent of similar proposals in UK Government’s Natural Environment White Paper (NEWP) back in 2011. However, at the time the NEWP was published the lack of a time-framed, spatial strategy to put such a network at the heart of all land use precluded effective implementation.



The latest [State of Nature report](#) revealed that 56% of the 4000 UK species for which adequate data are available had declined since the 1970’s and that 13% of c.8000 species are considered to be at risk of extinction in the UK. In this context, such a network is now a necessity, providing benefits to wildlife whilst also reconnecting local communities with nature, and benefiting the economy. We are advocating for a strong spatial NRN framework that will make a genuine, sustainable contribution to restoring nature by implementing the Lawton Principles of “more, bigger, better and joined” ecological networks.



The NRN is currently in the development stage. However, with nature continuing to decline, we urge the Government to act quickly in order to turn this ambition into practical action on the ground, and into law through the Environment Bill. We must learn from the failings of the NEWP as the new NRN framework is developed. A nationally coherent and comprehensive spatial strategy should be used to target all investment in nature's recovery, while national guidance on the development of Local Nature Recovery Maps is required in order to achieve a coherent network across the country.

### **Review of Areas of Outstanding Natural Beauty / National Parks**

In the report, Government celebrates progress made on the review to strengthen and enhance England's National Parks and Areas of Outstanding Natural Beauty, as led by Julian Glover. Link and many of its members responded to the call for evidence where we called for greater priority to be given to enhancing habitats, supporting species recovery, and improving access for all to these landscapes.

We welcomed the interim findings set out by Julian Glover, stating that more must be done for nature and beauty and for people who live in and visit these landscapes. We look forward to engaging with the Panel's report when it is launched in the autumn, and hope that its recommendations ensure that these areas deliver even more benefits for nature and for people in future.

### **Clean & Plentiful Water**

Government's progress report recognises that the commitment to improve 75% of our waters to good status by 2027 will be challenging to achieve, particularly given that in 2017 only 16% of England's waters meet that standard. This will require a step-change under the next River Basin Management Plan round - including more action on pollution from rural land management, building on the recently introduced New Farming Rules for Water (which are predicted to fall short of achieving the improvements our water environment needs). Water Industry ambitions to reduce leakage, reduce consumption, and improve water quality and environmental condition must be delivered, and the ambitions in the Environment Agency's draft Flood & Coastal Erosion Strategy regarding Natural Flood Management and biodiversity net gain through FCERM works are also to be commended. The Catchment Based Approach (CaBA) and Nature Recovery Network can play a valuable role in tying these ambitions together.

### **Clear Air Strategy**

In January, Link members welcomed the publication of the Clean Air Strategy, in particular the commitments to regulate ammonia emissions from farming and to reduce damaging nitrogen deposition on sensitive wildlife habitats. However, the delivery of the Strategy requires a new regulatory framework through primary legislation; progress on this has been stalled due to delays in the passage of the Environment Bill through parliament. Furthermore, a clear, funded plan of action is needed to set out how the Government will achieve the target on nitrogen deposition. This cannot be achieved by Government and its agencies in isolation, yet there is currently no process in place for consulting and engaging stakeholders and no mention of plans for this in the Progress Report.





## Securing clean, productive and biologically diverse seas and oceans



Our seas are in a poor state, with almost half of all fish stocks in the UK currently fished at unsustainable levels. It was therefore positive to see the 25 Year Environment Plan commit Government to implementing a sustainable fisheries policy post-Brexit, and working towards securing clean, healthy, productive and biologically diverse seas. This was an opportunity for Government to chart a new course and turn the fate of our oceans and marine wildlife around.

Unfortunately, the reality is currently falling well short of this ambition. Earlier this year Government published their revised UK Marine Strategy. Not only do we disagree with its assessment of the current state of UK marine waters (see [here](#)), but the weak targets (the majority of which simply call for no further declines to current conditions) and actions that it proposes will not get us where we need to be.

This does not align with the UK Government's ambition to be a global leader in marine conservation. The revised Strategy champions the new Westminster [Fisheries Bill](#) – another commitment in the 25 YEP - which will regulate UK fisheries post-Brexit and deliver sustainable fishing. However, as currently drafted, the Bill falls well short of this ambition, for instance by not committing to ensuring that fishing does not exceed maximum sustainable yield.

The revised UK marine strategy was soon followed by the designation of 41 new Marine Conservation Zones (MCZs) around England and Northern Ireland – the final tranche of MCZs to complete a network of Marine Protected Areas. Greater protection for our seas is of course always welcome, but it was disappointing that Government did not go as far as we would have liked to use this network to protect mobile species such as seabirds, many of which are suffering severe declines.

Rapid and decisive action is now needed if our seas are to recover enough to achieve Good Ecological Status. The targets and actions contained within the revised marine strategy must be revised, strengthened and given clear timescales for achievement, backed up by increase resources to address data gaps, monitoring and implementation of measures.

## Connecting people with the environment to improve health and wellbeing

We are facing a number of significant public health challenges: 20 million adults in the UK are [physically inactive](#), obesity is on the rise, growing mental ill health, dementia and social isolation. Having a thriving natural environment helps us to be more active, feel less stressed and improve our all-round health. Yet, the natural world is in decline, making it harder for people to gain the benefits it provides.

What's more, lack of access to nature and to green and blue space is a significant factor in health inequalities. Shockingly, those living in the most deprived areas are ten times less likely to live in the greenest areas. By increasing access to wildlife-rich natural surroundings, we can help stop the rise of preventable, life-limiting and costly illnesses, and reduce avoidable health inequalities.



We welcomed the emphasis that the 25 Year Environment Plan put on connecting people to nature for their health, wellbeing and happiness - as well as nature's recovery. However, we believe that even greater ambition will be required to reverse the decline of nature and improve people's access to gain the health and wellbeing benefits it provides.

The Government needs to:

- establish and implement a statutory Nature Recovery Network and associated Nature Recovery Network Maps that will bring nature into every neighbourhood and ensure everyone, whatever their background, has access to wildlife-rich natural green space every day;
- invest in green exercise or volunteering programmes to reduce the prevalence and impact of obesity, depression and loneliness (key Government health priorities);
- embed 'nature on prescription' in our health service, improving patient health, alleviating the burden on GPs and benefitting the wider public, through better access to nature.

We also welcomed the commitment from Defra to explore approaches in order to incorporate youth voices in the development of environment policy. In a time when four out of five children have little contact with nature and when we have lost 60% of our wildlife, it has never been more urgent to put young people at the forefront of the political agenda. We welcome the idea of piloting and testing ways to engage young people more and have their voices heard on environmental issues that matter to them.

We welcome Defra's collection of feedback from young people on the 25 Year Environment Plan via the Youth Forum set up by DCMS to guide their future activities and plans. However, we would highly recommend that Defra set up its own Youth Forum. This would send a positive message to young people and would represent an important step in empowering young people to play an active role in society in an area they care most. We would also highly recommend inviting Youth Forum members from environmental organisations and initiatives to join future engagement opportunities (e.g. #Iwill4nature ambassadors and Our Bright Future Youth Forum members).

### Why Young People?

Young people are the age group that is the most politically disengaged. However, as the current Youth Climate Strikes and [research](#) from National Union of Students have shown, they deeply care about the environment (key stats below):

- Over 2 in 3 (69%) say they would be highly or very likely to vote for a political party that pledged to increase action to improve protection for the environment.
- Climate change (27%) and destruction of nature and loss of plants and animal species (22%) are in the top 4 issues that respondents were most likely to say that politicians did not discuss enough
- Half of respondents (50%) felt that the UK should pass laws providing a higher level of protection than the current EU laws. 4 in 10 (38%) felt the laws should be providing the same level of protection as the current laws.
- 7 in 10 (69%) agreed that there should be more opportunities to take action to help protect the environment



## Protecting and improving the global environment

We welcome the acknowledgement of the important role that the UK can play to help restore the environment globally. The UK is highly dependent on natural capital overseas for the products it imports, so it is neither morally acceptable nor in our own economic interests to continue to damage the environment overseas.

Beyond the primary need to ensure that we protect the global environment, ensuring that the impact of the UK's global footprint is both reduced and minimised will deliver a number of benefits for business including:

- Reduced operating costs for business. Operation and supply chains depend on reliable supplies of water, productive soil and a stable microclimate. Maintaining nature can enhance productivity.
- Resilience and future proofing. Healthy ecosystems increase supply chain resilience in the face of climate change, reduce impacts from natural disasters, and maintain food security.
- Competitive advantage for UK trade. Companies that reduce nature impacts can unlock competitive advantage through innovation or staying ahead of regulation.
- Access to finance and inward investment. Institutional investors are increasingly incorporating sustainability criteria into lending decisions. Good stewardship can attract investment.

The UK Government is demonstrating ambition to lead on the natural capital agenda through innovative new policies. These include the Chancellor's commitment in the Spring Statement to put sustainability at the heart of our economic model, to introduce a system of biodiversity net gain for developers, and to review the economic impact of biodiversity decline, all of which we very much welcome. However, to secure our global leadership position and provide a foundation for the UK to influence key decisions in 2020, the UK needs the new Environment Act to be truly world-leading, locking in the commitment to reduce the impact of our global footprint in legislation. Examples of ways the UK can demonstrate this in the Environment Act include:

- A commitment to develop a progressive global footprint objective, target and associated delivery mechanisms. This will provide the long-term certainty about environmental policy that a business needs to take decisions and have the confidence to invest. Certainty that future policy will reward investment in sustainable management of natural capital, by for example giving incentives to promote sustainability down international supply chains will enable business to act and help meet consumer demand for high quality, sustainably produced goods.
- A 'Due Diligence Obligation' requiring business to assess their global impact, develop a plan to respond and report on progress. The obligation will provide business with the long-term certainty and confidence they need to invest and adapt, and will level the playing field – driving action by less progressive businesses.
- Through the above and taking responsibility for the impact of the UK's footprint overseas through an ambitious Global Resource Institute, we can encourage other countries to demonstrate similar commitment.

2020 will be a crucial year for the environment, as representatives of 196 countries come together in China to agree a new global plan for the recovery of nature. Whilst it has been clear for some time that the UK will not meet most of its existing 2020 targets, it can and should act as an international leader in the development and agreement on targets for the next decade, and the implementation of enabling measures to ensure that we attain them.

## A challenge to Government

Over the years, successive UK and devolved Governments have made numerous plans to protect and restore nature. None has succeeded. Achieving the aims of the 25 Year Environment Plan would allow the new UK Government to leave a legacy that they can be proud of. The sooner the hard work starts to remedy the problems, the greater the chance that future generations will inherit a habitable and ecologically rich planet.

**All parts of society and Government need to act commensurate with the crisis we are in. Government should use the opportunity presented by the new Westminster Environment Bill to establish clear, measurable and enforceable targets for nature's recovery in law, and provide the funding needed to meet these targets. Transparent and independent monitoring and reporting of progress is vital, as is a clear system in law that will hold this and future governments to account for achieving these targets. These actions will provide a concrete demonstration of Government's commitment to acting as a global leader on environmental issues, in preparation for next year when leaders from across the world will come together to agree a new global plan for the recovery of nature.**





Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 52 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

This report is supported by the following Link member organisations:



For questions or further information please contact:

Dan Pescod, Head of Advocacy and Policy, Wildlife and Countryside Link

T: 020 7820 8600 E: [dan@wcl.org.uk](mailto:dan@wcl.org.uk)