

The Rt Hon Rishi Sunak MP
Chancellor of the Exchequer
Her Majesty's Treasury
1, Horse Guards Road,
London SW1A 2HQ

Growing back better

Dear Chancellor,

CC Rt Hon George Eustice MP, Secretary of State, DEFRA

A rapid and resilient economic recovery from the covid-19 crisis must be a green recovery. The Government can create a fairer and more resilient society by restoring natural capital: the natural wealth that underpins our wellbeing and our productive economy.

Please find enclosed proposals for investment in our natural environment, which can create employment quickly, save billions of pounds for the NHS, level up health and livelihoods, and guard our economy against future natural disasters. Of course, this should go hand-in-hand with rapid investment in the low-carbon economy to help avert dangerous climate change and policies that reduce the UK's global environmental footprint and support sustainable resilient supply chains.

We have included a compendium of "shovel ready" project proposals, which could create jobs immediately, with work on environmental enhancements that could begin on the ground this summer, in urban and rural areas, the length and breadth of the country.

£315 million of new investment could bring forward the creation of 200,000 hectares of priority terrestrial and marine habitat in a new Nature Recovery Network. It would begin to reverse declines in biodiversity, providing better access to nature for many thousands of people, creating 10,000 jobs, supporting rural and urban economies countrywide, locking away millions of tonnes of carbon in pursuit of our net zero target, and protecting people and businesses from future natural disasters. This would set us on the road to the Government's goal of passing on our environment in better condition.

The projects in our compendium are ones that are ready to go: projects that have been stopped by the pandemic or could be brought forward rapidly to kickstart the economy and the 25 Year Environment Plan. Together, they will help to ensure that the economy recovers quickly from the current downturn and, crucially, that it remains resilient in the face of future shocks. They will also help to even out inequalities, ensuring everyone can live and work in a better environment.

These are just a beginning. The Government has the chance to reshape our economy in a better way in the aftermath of the pandemic. We can "grow back better". In the briefing here, we sketch out some of the ways that Government can boost the programme of improvement set out in the 25 Year Environment Plan, with radical reform of the agricultural system and swift action to tackle the climate and ecological emergencies. In the days ahead, our organisations will propose more big ideas to restore our natural environment at an unprecedented scale and, in doing so, ensure a more prosperous future for our economy and society.

Yours sincerely

Hilary McGrady, CEO, The National Trust

Beccy Speight, CEO, RSPB

Mark Lloyd, CEO, The Rivers Trusts

James Thornton, CEO, ClientEarth

Andy Atkins, CEO, A Rocha UK

Steve Andrews, CEO, Earthwatch Europe

Crispin Truman, CEO, CPRE The Countryside Charity

Julie Williams, CEO, Butterfly Conservation

David Bunt, Chairman, Institute of Fisheries Management

Kit Stoner, CEO, Bat Conservation Trust

Caroline Ruane, CEO, Naturewatch Foundation

Brian da Cal, Director, Four Paws UK

Ian Dunn, CEO, Plantlife International

Hugo Tagholm, CEO, Surfers Against Sewage

Dr Jeremy Biggs, Director, Freshwater Habitats Trust

Jill Nelson, CEO, People's Trust for Endangered Species

Andy Knott MBE, CEO, League Against Cruel Sports

Dr Mark Avery, Co-Founder and Director, Wild Justice

Christopher Price, CEO, Rare Breeds Survival Trust

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Rebecca Wrigley, co-Director, Rewilding Britain

Dr Tony Gent, CEO, Amphibian & Reptile Conservation Trust

Matt Shardlow, CEO, Buglife

James Robinson, Conservation Director, WWT

Shaun Spiers, Director, Green Alliance

Kate Ashbrook, General Secretary, The Open Spaces Society

David Joy, CEO, British Canoeing

Sandy Luk, CEO, Marine Conservation Society

Tanya Curry, Interim CEO, The Ramblers

Paul Knight, CEO, Salmon & Trout Conservation

Corinne Pluchino, CEO, Campaign for National Parks

Tom Hunt, National Coordinator, ALERC

Jamie Cook, CEO, The Angling Trust

Tanya Steele, CEO, WWF UK

Craig Bennett, CEO, The Wildlife Trusts

Darren Moorcroft, CEO, The Woodland Trust

Richard Benwell, CEO, Wildlife & Countryside Link



Investing in nature

Investing in nature—with targeted enhancements in cities and landscape-scale changes across the countryside—can generate jobs and save money, kickstarting a new Nature Recovery Network.

(1) Natural Health Service: invest in urban nature

The UK's green and blue spaces produce health and wellbeing benefits worth over £34 billion a year, but these benefits are not shared evenly.

Children from the most deprived areas are 20% less likely to spend time outside than those in affluent areas and 70% of children from white backgrounds spend time outside once a week compared to 56% of children from black, Asian and ethnic minority backgrounds. These disparities correspond to a lack of access to greenspace in the most deprived areas and contribute to growing public health problems, such as obesity and poor mental health.

Quite simply, those who live in the most nature-deprived areas are more likely to face chronic ill health and live shorter lives. Coronavirus has thrived on these inequalities, with death rates twice as high in deprived areas.

Investing in nature in places where it is most lacking will immediately start to tackle these inequalities. The reduced health inequalities in areas with more green space can save approximately 1,328 lives per year and billions of pounds for the NHS, as well as boosting productivity through a happier, healthier workforce and delivery of other ecosystem services such as improved air quality.

In our compendium, we have highlighted a number of projects that could improve the local environment for many thousands of people, with apprenticeships and training opportunities in protecting nature, wild city programmes, opportunities for youth engagement, and other ways of bringing those gems of nature into people's communities in a way that can help to transform lives.

We urge Government to go further, with an investment plan to “level up” equitable access to nature with a targeted programme of environmental enhancement in urban and peri-urban areas where indices of multiple deprivation overlap with limited access to quality greenspaces.

A rapid programme could focus on:

- a) **Green communities urban renewal fund:** allowing communities to re-green their neighbourhoods through street trees, local nature reserves, urban parks and shared green spaces.
- b) **Blue corridors:** action to enhance urban waterways and canals and improve access to our coasts.
- c) **Access all areas:** infrastructure fixes, such as active transport routes, to help people reach and enjoy green and blue spaces safely and sustainably.
- d) **Community connections:** projects for active engagement with nature through volunteer programmes, partnerships with local schools and community food growing projects and social prescribing.

Together, these measures should target the most nature-deprived areas in the country as a rapid means of levelling up access to nature and tackling health inequalities.



(2) Large-scale habitat recovery and creation for jobs, risk mitigation and economic resilience

The global economy is on its knees because of a natural disaster, which may well have been caused by human activities.

There are many other environmental risks that pose enormous threats to people's livelihoods and the productive economy here in the UK: flooding, drought, climate change, soil degradation, air pollution, fish stock collapse, pollinator declines. These threats are not distant and intangible—they are happening now. Last year was the second worst on record for flood and drought in the UK, with flooding alone costing £2.2 billion per year.

A resilient recovery would guard the economy against this kind of high-impact environmental shock. Investment in nature-based solutions and reducing harm to nature is a prudent, cost-effective economic strategy for reducing the economic and social risks of environmental degradation, as shown by the interim report of the Dasgupta Review. It will also enhance the resilience of nature-dependent sectors such as food and farming, tourism and fishing, which together support over 7 million jobs and £350 billion in GDP.

The Government's 25 Year Environment Plan set out important goals in this regard, which could set our environment on the road to recovery: 75% of protected sites in good condition, 500,000 hectares of new priority habitat, and 12% tree cover. These goals are an essential start in tackling the twin climate and ecological crises and meeting key legal targets such as net zero emissions by 2050.

In addition to risk mitigation and resilience building, frontloading delivery of the 25 Year Plan would create jobs and stimulate the economy now. In our compendium, there are large-scale habitat delivery programmes that could create 200,000 of the 500,000 hectares of priority habitat promised in the 25 Year plan. Undertaking these projects could underpin 5,000 relatively skilled jobs in the environment sector, 5,000 more in lower-skilled jobs in construction, agricultural contractors and other delivery roles, as well as bring substantial investment in local economies.

Quick and strategic action is critical, kick-starting a national Nature Recovery Network where it will deliver the greatest ecological with supporting economic and social benefit. As well as bringing forward the short-term opportunities in the compendium, the Government should set about a large-scale programme of restoration and environmental renewal in landscapes across the country.

a) Delivery by civil society

Civil society organisations offer the most efficient means of delivering environmental enhancement.

They have specialist skills and knowledge; practical on-the-ground conservation capability; they can draw on a large volunteer and citizen scientist workforce; and they are able to attract large-scale funding from members, philanthropic funds and the private sector which would not be readily available to Government. In this way, charities leverage in large amounts of conservation spending.

However, the sector's financial situation has been severely weakened by the covid-19 pandemic, so its ability to deliver critical environmental improvement projects is compromised at exactly the same time as it should be scaled up (see annex 1: projects currently paused because of coronavirus). Government has the opportunity now to enable NGOs to reinstate crucial projects and services that have been abandoned, and to go beyond this by funding ambitious new projects that create jobs and contribute to our economic resilience.



As part of a “green recovery”, Government should ensure that a strong civil society sector and public sector work together in large-scale environmental improvements for a more resilient economy.

Create a National Nature Service for England

A “Conservation Corps” or National Nature Service for England could provide training, exercise, contact with nature and an income for unemployed people, by offering them work in a range of conservation-related activities.

Being out of work can have hugely damaging impacts on the mental and physical health of those affected. If this not addressed promptly, the likelihood of long-term unemployment increases. Modern conservation offers a way to alleviate this whilst also providing vital skills in land-management, plant and animal husbandry, and science and technology through citizen science projects. Many conservation projects, such as tree-planting, are relatively low-skilled employment opportunities. They can be undertaken safely while adhering to social distancing, in the open air, with relatively low finance requirements compared with traditional hard infrastructure projects.

After the Great Depression in the 1930s, The Civilian Conservation Corps was formed in the United States. This was a “back to work” programme where young men were creating national parks and conserving nature. By the time the programme ended at the start of World War II, President Roosevelt’s “Tree Army” had planted more than 3.5 billion trees on land made barren from fires, natural erosion, agriculture or lumbering. In addition, more than 700 new state parks were established through the program. It employed 3 million men over the nine years it operated and cost about \$34million a year and “led to a greater public awareness and appreciation of the outdoors and the nation’s natural resources”. In the UK, the Manpower Services Commission, set up by the Conservative Heath Government in the 1970s, also provided considerable employment opportunities with environmental benefits.

The Government should fund environmental charities to support a new National Nature Service. Conservation groups could sign up as accredited bodies to help run the Service, offering support, training and supervision. In some cases this could lead to an apprenticeship qualification. Funding could be through a top-up to Universal Credit, administered through sponsoring bodies. Participants could undertake a variety of work, targeted by an independent board (after the model of the Nature Improvement Areas), or by Local Nature Partnerships working with Local Enterprise Partnerships. Options could include:

- Delivering large-scale habitat creation, restoration and enhancement
- Recovery and protection of priority species
- Improving public footpaths, waterways and access to nature
- Undertaking a “citizen census” of natural capital, as proposed by the Natural Capital Committee
- Creating a “Greener Belt”, with funded work to improve biodiversity near to urban populations
- A Biosecurity Taskforce to guard against invasive species and improve biosecurity building on models such as the Woodland Trust’s Observatree project
- Assisting in the delivery of agri-environment schemes on farms where labour is in short supply.

Our Project Compendium, attached in Annex 1, sets out a list of “shovel ready” projects that could be delivered by a Citizen Conservation Corps, coordinated by environmental NGOs: habitat creation opportunities including peatland restoration; tree-planting; wildflower meadows; pond creation; mudflat and saltmarsh.



Build on NGOs' existing expertise

At the same time, Government should allocate new funds for NGO partners to deliver and scale up their services such as sustainable farming advice (benefiting nature, air, water and soil quality, and food supply chains), terrestrial and marine habitat creation and enhancement, planning, surveying and monitoring, education and access (benefiting people's health and well-being) and improving natural capital (contributing to economic and social resilience).

The environment sector must remain rigorously independent so that it can continue to hold decision-makers to account, so funds should be administered outside core Defra. For example, funding could be managed by Natural England or an independent panel. Such a panel could consider applications and distribute funds on a competitive basis, based on criteria to help ensure diverse support across the sector and maximum environmental returns. Precedents include the Nature Improvement Area fund.

This should also be a time-limited fund to ensure that NGOs do not become dependent on state funding or beholden to Government. For example, funding could be allocated for the duration of the next Spending Review to help cover the on-going delivery risks posed by coronavirus and to ensure that action to deliver the 25 Year Environment Plan receives a front-loaded kickstart of environmental action.

Government should also build on NGO work to develop innovative new blended finance mechanisms. These could include development of a 'Natural Infrastructure Scheme' (as proposed by National Trust and Green Alliance) and creation of a 'Blue Impact Fund' to support sustainable growth in UK seafood chains and investment in coastal nature-based solutions.

b) Delivery by the public sector

The Government should play its own part in delivery.

Defra is already considering the use of public land to create a "habitat bank" of environmental improvements that can be bought by developers to fulfil forthcoming requirements to achieve biodiversity net gain. Similarly, public land could be put out to auction or under management leases with environmental NGOs to contribute to habitat banks. Local Authorities and Central Departments such as the Ministry of Defence could provide early opportunities for contributing to the Nature Recovery Network, piloting the use of Local Nature Recovery Strategies to help deliver this will help to guide this investment in line with local and strategic priorities.

The Government should create a fund for Departments and public bodies that own land to invest now in restoring and enhancing habitats. Government also has the opportunity to frontload investment and to attract substantial private funding by guaranteeing a level of demand for biodiversity net gain habitat banks and pollution control measures. This could include provision of habitat buffers around protected sites to build up the resilience of the protected site network.

The Public Forest Estate is a well-loved common heritage for the nation and provides unique opportunities for restoration of Planted Ancient Woodland Sites (PAWS), species rich grassland and heathland. The Government should, as a priority, accelerate activities on its existing sites such as restoration of ancient woodland that has planted with conifers. There will also be opportunities to increase the size of the Public Forest Estate by buying land for habitat creation, although this must not be at the expense of other existing important habitats and new tree planting proposals should accord with the principles of 'the right tree in the right place'.



Environmental conditions for support

Many countries around the world are making environmental improvement a pre-condition of government support. For example, France and Austria have imposed requirements on aviation industries to reduce emissions.

In the UK, a “net zero” test should be applied to all support packages, ensuring that robust requirements for emissions reduction are in place and that industries that benefit from public money have a future that is obliged to be compatible with or further our net zero responsibilities.

The UK should show leadership in applying similar requirements for the natural environment.

Choosing investment in environmentally damaging hard infrastructure over less damaging alternatives can be shown to simply lay down concrete foundations for future problems. A generation of new roads built in the 1990s, intended to bulldoze the country out of recession through cutting congestion, missed their primary aim – congestion in the areas targeted has increased above national rates in subsequent decades, as a direct result of the construction. When combined with increased pollution and carbon emissions, reduced farmland for food production and loss of precious habitats and landscapes, we can say with confidence that these recovery measures, delivered at great public cost, made things worse – not better.

The Government’s proposal for biodiversity net gain, set out in the Environment Bill, could help ensure that major infrastructure projects contribute to improvements for nature. The mandatory system will not be implemented for several years, but many developers are already used to working with the biodiversity net gain system through experience of National Planning Policy Framework requirements. The mandatory system could be expanded as a condition for any support.

- a) **Biodiversity net gain requirements:** any infrastructure delivery projects—public or private—that receive public money as part of a fiscal stimulus should be required to achieve net biodiversity gain, using the Defra metric for measuring impacts on habitats, and in line with the mitigation hierarchy.
- b) **Biodiversity net gain in major infrastructure:** the biodiversity net gain requirements in the Environment Bill should be expanded to include major and other large-scale infrastructure projects, such as developments that fall under the Nationally Significant Infrastructure Projects system. This must be in strict adherence with the mitigation hierarchy and recognising that irreplaceable habitats cannot be recreated and therefore neither a replacement nor a gain can ever be achieved (HS2 is an example of where this principle has not been recognised). This is important so biodiversity net gain is not seen as a license to trash habitats and that irreplaceable habitats and environmental features remain strict no-go areas for development.
- c) **Environmental Improvement Test:** all projects supported as part of the fiscal stimulus package should be required to be compatible with the overall aspiration of the 25 Year Environment Plan to improve nature and create an environmentally resilient economy. To ensure a green recovery it would also be important too to apply a test to all government spending to ensure it aligns with and does not undermine wider net zero and nature restoration objectives.
- d) **Corporate due diligence requirements:** any support should require companies to undertake clear due diligence to ensure that their supply chains are environmentally responsible, reporting on impacts and taking robust measures to ensure that they do not contribute to environmental harm such as deforestation.



Regulatory change

Regulatory changes can help to deliver these environmental improvements, providing certainty in the direction of travel to help businesses invest in natural solutions. Government had already set out an ambitious programme of regulatory change and should reintroduce reforms with renewed urgency.

There must not be a knee-jerk slashing of regulation, as so often in periods of recession. While it may appear to cut costs for business, it simply transfers those costs to the public, and increases the fragility of businesses in the longer term. One recent example is evidence that air pollution has exacerbated the pandemic; countries that have cut air quality regulations have been hit harder. Wide scale deregulation simply piles up greater environmental and economic costs further down the line, from the 2013 horsemeat scandal wiping £300 million off the value of UK supermarkets to the £1 billion in public money required to solve the cladding issues identified in the wake of the Grenfell tower tragedy.

The Agriculture Bill

The Agriculture Bill sets up an essential framework for investment in public money for public goods and future-proofing the farming sector by investing in the natural resources which underpin it. Policy development and consultation on an Environmental Land Management scheme should not be delayed, nor should development of parallel schemes to enhance animal welfare and farm productivity. This package of reform will provide far better value for taxpayers' money and form part of a green recovery.

Gaps in the Bill itself must be plugged on long-term funding and budget-setting processes; regulatory standards and enforcement; and legislative assurances that domestic standards will not be undercut by future Free Trade Agreements.

The Fisheries Bill

Fish stocks are a textbook example of the interdependence of ecology and economy. Fisheries have a theoretically infinite economic value as a low-carbon, renewable resource, but a value that could fall precipitously to zero if over-exploitation breaches the threshold at which ecosystems and stocks are able to replenish themselves. As part of a wider programme of ocean recovery, the Fisheries Bill should be strengthened to ensure that fisheries are climate-smart and that catch limits are set at sustainable levels, with effective monitoring and enforcement to ensure they are respected.

The Environment Bill

The Environment Bill can play a key role in business and public confidence in the Government's plans to restore nature and make our use of natural resources more sustainable – the timetable for the Bill and its important provisions should not be delayed. It can also demonstrate domestic leadership as the world seeks to agree a new global deal for nature at next year's Convention on Biological Diversity conference. In addition to the [changes already necessary](#), it should be strengthened in light of the coronavirus crisis:

- a) **The Government should commit to set apex targets to restore nature on land and at sea.** The bill should be amended to include targets to reverse species loss and improve the extent and condition of habitats, with long-term goals for the recovery of nature.
- b) **A goal to reduce the UK's global environmental footprint should be a priority target.** This should stand alongside regulatory requirements for reporting and due diligence in supply



chains for commodities that risk causing deforestation and conversion, as proposed by the Global Resource Initiative.

In addition, recent polling has demonstrated that a majority of people are more interested in quality of life indicators than they are in metrics such as GDP. Demonstrating that the Government is committed to creating a country that is rich in nature would be a powerful symbol of political commitment to the objectives of the 25 Year Plan. The 25 Year Environment Plan reporting requirements introduced by the Environment Bill should be strengthened to require a full day of Parliamentary debate on progress in environmental improvement each year.





Annex 1: Projects currently paused because of coronavirus

Habitat conservation and management

- Disruption to control of invasive non-native species (RSPB, Wildlife Trusts, Mersey Rivers Trust)
- Seagrass restoration (WWF, Project Seagrass, Sky Ocean Rescue)
- Deterioration of rare wildflower meadows (Wildlife Trusts)
- Suspension of beach litter monitoring and dive surveys of Marine Protected Areas (Marine Conservation Society)
- Inability to physically judge parks and greenspaces for the Green Flag Award (Keep Britain Tidy)
- Potential increase in litter in or around rivers (due to no clean ups or litter pick) compounded by a possible increase in fly tipping (Mersey Rivers Trust)
- Longer term impacts anticipated as organisations recover (Wildlife Trusts, National Trust)

Endangered species / rare breeds

- Insufficient staff to undertake vital conservation management including surveying for species, excluding predators from nesting colonies, and advising farmers (RSPB)
- Potential loss of species such as dormice from some areas (Wildlife Trusts)
- Postponed start of our Kent Rare Moths NLHF project by 12 months due to disruption to fundraising for match funding (Butterfly Conservation)
- Delays to some work, e.g. reintroduction programmes and population monitoring of endangered species (Wildlife Trusts, Buglife, Butterfly Conservation)
- Some work may not be possible if funding deadlines not extended by government (People's Trust for Endangered Species)
- Break in long term data collection studies that have been contributing to domestic and international conservation policy and management (Whale and Dolphin Conservation)
- Loss of a lot of strategic breeding of rare breeds due to closure of farm parks (Rare Breed Survival Trust)
- Catch and movement of eels to assist migration stopped

Habitat creation and restoration

- Now unlikely to meet targets for creation of 18,000 hectares of new woodland by 2030, and the creation and restoration of 25,000 hectares of new habitats (National Trust)
- Prevention of delivery of projects to improve habitat quality, biodiversity (Rivers Trust)
- Delays in field work for habitat restoration projects (Buglife)
- Peatland restoration in Scotland halted (Buglife, Butterfly Conservation)
- Delay to marine habitat restoration projects (Marine Conservation Society)

Water quality and flooding

- Preventing delivery of a wide range of projects to improve water quality and quantity, and reduce flood risk (Rivers Trust)
- Nearly all capital works are delayed until summer 2021, which will cause an increased workload that year (Severn Rivers Trust)
- Insufficient staff to manage water levels and water quality at sites (RSPB)
- Prevention of work to protect river habitats as well as flood risk management and provision of clean drinking water (Westcountry Rivers Trust)



- Planned habitat management of rivers and beaches is not being undertaken due to lack of access, with potential for deterioration in quality. (Keep Britain Tidy)
- Reduced ability to monitor the impact of projects and engage with farmers (Rivers Trust)
- Water quality sampling has stopped which will result in data gaps (Mersey Rivers Trust)

Biosecurity

- Collaboration with Defra on controlling bovine TB with a range of biosecurity, communications and badger vaccination measures has been stopped (National Trust)

Public and community engagement

- Decrease in activity to engage people with their natural environment and increase the sense of community stewardship (Buglife, Marine Conservation Society)
- Delay to funding submission dates putting a major public engagement project at risk (Butterfly Conservation)
- Cancellation of all education and volunteer work (Severn Rivers Trust)