Autumn Budget and Spending Review 2021

A representation submitted by Wildlife and Countryside Link, September 2021[1]

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[1] *Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 62 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.*

1. Summary of recommendations

The next three years will be critical to the Government's chances of halting the decline of biodiversity. There is a major gap between existing funding commitments and the level of investment needed to meet the Government's nature and climate targets.

Part of that gap can be filled by more effective spending by DEFRA and other departments, such as HMCLG, BEIS, DHSC and others; part of the gap can be filled by private finance. Nevertheless, even with a perfect allocation of existing budgets by DEFRA, the next three years could face major shortfalls in environmental investment, and major sources of private finance are unlikely to flow until after the current Spending Review (SR) period. More public money will be needed from HMT to fill the investment gap, alongside preparatory work to pave the way for private investment.

Three ways the spending review can deliver the government's nature positive ambitions supporting levelling-up, net zero and economic prosperity are:

1. Direct Investment from government to achieve a "nature positive" future. Specific funding will be required in the areas of:

1.1 Restoring and protecting habitats and species to halt the decline of nature by 2030: an additional £2.262bn p.a. is needed across the UK.
1.2 Providing health and wellbeing benefits through access to nature where people live and work: at-least an initial £1.83bn p.a. (£5.5bn over a three-year period) across the UK.
1.3 Underpinning our environmental commitments through advice, data, enforcement, and capacity-building: an additional £501m p.a. in England, with proportionate increases in devolved budgets..

These should be financed through direct government spending or new debt financing instruments between 2022/3, 2023/4 and 2024/5.

2. Greening of wider government spending decisions. Changing the way government factors nature into decision-making is crucial and requires:

2.1 Effective Green Book implementation across government to reflect the full value of biodiversity and natural capital in investment and policy choices.
2.2 Strategic environmental screening of all future government spending and taxation policies to ensure that the UK's annual budgets and multi-year spending reviews support a net zero, nature positive transition (starting with application of a 'net zero test' to the 2021 Spending Review and Autumn Budget).
2.3 Publication of the results of this analysis alongside fiscal/budget reports, together with a summary of how this information was used to inform fiscal policy decisions.
2.4 A new green procurement policy to ensure the governments annual spend on goods and services is nature positive and sets the standard for the private sector.

3. Financing Green to expand private sector investment. Government can facilitate much greater private investment into nature if it:

3.1 Properly finances the public bodies who will be required to oversee new markets.

3.2 Develops and enforces effective market rules and standards.

3.3 Ensures consistency and coherence between the new investment opportunities.

3.4 Establishes the right criteria for new green bond issues and the UK Infrastructure Bank (UKIB) to invest, and leverages further funding into biodiversity and natural capital investments.

2. Introduction and policy context

'The Government commits to: (1) delivering a 'nature positive' future, in which we leave the environment in a better state than we found it, and reverse biodiversity loss globally by 2030; and (2) ensuring economic and financial decision-making, and the systems and institutions that underpin it, supports the delivery of that nature positive future.'[2] - Government Response to the Dasgupta Review 2021.

This SR period will be critical for meeting the legally-binding objectives to halt nature's decline by 2030 and cut carbon emissions by 78% by 2035[3]. It will also be essential in re-setting the economy on a more sustainable basis following the pandemic and providing more people with access to a healthy natural world.

As emphasised in the Dasgupta Review, inaction is costly, as we deplete our natural resources quicker than we replenish them. We must reverse this trend to save our economy and our society. However on our present trajectory, there is a major funding gap in delivery for nature. Business as usual would see continued decline in species, a shortfall in spending on nature-based solutions to climate change, and the continuation of unsustainable development and inequitable access to nature.

In the longer term, private finance and the effect of proposed policy changes (like 'public money for public goods' in land management and biodiversity net gain in spatial planning) may provide a major component of the spending needed to achieve those statutory and policy goals. In the short term, however, a significant spending boost is needed in direct environmental improvement and to lay the groundwork for a greener, low-carbon, nature-rich economy.

To 'Build Back Better' from Covid-19, this Spending Review should focus on the environmental investments needed to achieve the government's new environmental targets, improve everybody's access to nature and create green jobs and a sustainable, green economy.

Levelling up, economic prosperity, net zero and a thriving natural environment are clearly interdependent. In recent years, the Chancellor has recognised the need for a "nature-positive economy" in the Plan for Growth[4] (PfG 2021) and the National Infrastructure Strategy[5] (2020). Strong commitments on nature, climate and health & wellbeing have also been made through policies such as

[2] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962785/The_Economics_of_Biodiversity_The_Dasgupta_Review_Full_Report.pdf

[3] https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035

[4] https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth/build-back-better-our-plan-for-growth-html

[5] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938539/NIS_Report_Web_Accessible.pdf

the 25 Year Environment Plan (25YEP), net zero (e.g. the Clean Air Strategy), the Environment Bill, the Agriculture Act, the Animal Sentience Bill and others.

Despite this, nature is still in crisis. The State of Nature Report[6] (2019) reveals that 41% of UK species are in decline with 15% being under threat of extinction in the UK. Further research[7] from the Natural History Museum shows that the UK not only comes bottom of the list for G7 countries in terms of the amount of biodiversity retained but is also third from the bottom across all European countries. While land managers, business, charities and the public all have a role to play, government action and expenditure are utterly vital to lead efforts to address the nature crisis.

The Covid-19 pandemic has slowed down delivery on the ground for nature even more. Around 2/3 of organisations that deliver nature restoration have had to reduce the number of projects they deliver, some by up to a quarter, with an average reduction of 14% in the number of projects being carried out in 2021/22.[8]

There is also a wide funding gap for delivery on the ground. In terms of biodiversity alone, for example, government figures show that public sector spending in the UK was just £473 million in 2018/2019, a dramatic decline, in real terms, of 33% over the past 5 years and corresponds to a vanishingly small 0.02%, of UK GDP.[9] This is less than the current annual budget allocation of £500 million for pot hole repairs.

To deliver the government's UK nature ambitions and also reap the economic and social benefits which come from nature, the Government must ensure its evolving funding commitments—through Biodiversity Net Gain (BNG), and the new Environment Land Management (ELM) policy—frontload investment for nature and also make the necessary adjustments to our financial and governance decision making systems. However, only a small portion of those future funding possibilities will be realised in the next three years.

Major direct investment from the HMT will be needed, alongside more cross-departmental spending on nature outside of Defra, to reflect the interdependence of much of our infrastructure and economy with nature. A better allocation of spending within Defra is also needed, as well as preparatory work for future green regulation and finance. Investing in nature works, is good value for money and delivers benefits which other spending cannot.

[6] https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf
[7] https://www.rspb.org.uk/globalassets/downloads/about-us/48398rspb-biodivesity-intactness-index-summary-report-v4.pdf

[8] https://www.wcl.org.uk/docs/WCL_eNGO_COVID-19_Impact_Report_July_2021.pdf
[9] https://jncc.gov.uk/our-work/ukbi-e2-biodiversity-expenditure/

3. The Scale of need

Our estimate of the overall financing required to achieve the Government's nature positive ambitions is approximately **£6.8bn per year in total**[10]**.** This includes: getting on track to halt the decline of nature by 2030; contributing to meeting climate change mitigation targets; and providing equitable access to a healthy natural environment. **This is an estimated £4.594bn greater** than estimated current annual government spend, including direct public investment in biodiversity (<£500m a year), spending on 'environmental and animal welfare outcomes' under the Food, Farming and Countryside Programme[11] expected over the next three years (an average of £1.093bn a year), and other specific funding commitments we could identify such as the Nature for Climate Fund.

There are three ways the Government can make up this shortfall during this spending review period:

- Increase direct government investment in the short-term to pay for the things it alone can do;
- Put nature at the heart of all spending decisions, avoiding further costs; and,
- Leverage private finance and use new debt financing approaches to deliver nature outcomes.

Our best estimates of scale of need in relation to achieving nature-focused targets are set out below. The scale of need is an estimate of the costs of meeting our understanding of the current Government's environmental targets and objectives. These are calculations based purely on need over the course of the three-year SR period. The costings in this section do not take into account current Government spending, which is considered in section 4.

Table 1 outlines the annual spend needed for priority habitats, hedgerows, widespread species and species recovery per year. It is there to demonstrate the scale of need for these specific environmental delivery areas. This table is a subset of the overall figure on line 6 of Table 2.

Table 1: Estimated Annual Financial Needs for Habitats and Species alone (£m) (See Table 2 for full calculation of species, habitats, grassland, arable, priority habitats and boundary features/hedgerows) [12]

	England	Northern Ireland	Scotland	Wales	UK
Priority habitats	545	38	335	142	1060
Hedgerows	198	42	16	38	294
Widespread species	218	23	52	33	326
Species recovery	68	8	41	11	128
Total	1.029	222	444	224	1,808

These estimates are based on a model that:

- Quantifies existing land uses, priority habitats, landscape and historic environment features in the four countries of the UK;

[10] NB this is likely to be an underestimate- some devolved costs and needs not accounted for

[11] An Agricultural Transition Plan, 2021-2024, Defra, November 2020

[12] These figures are for terrestrial habitats and species only and exclude freshwater bodies and the marine environment. They are biodiversity focussed.

- Identifies land management needs to meet a range of objectives for biodiversity, landscape, the historic environment, water quality, soil protection and organic farming;
- Estimates the unit costs of the identified land management measures; and
- Combines these numbers to estimate the overall costs of land management to meet environmental objectives across the UK.

The unit costs were based on current payment rates in existing land management schemes and were also adjusted to take account of the underlying drivers of costs and income foregone. The model was designed to enable the effects on overall costs of changes in policy choices, as well as future economic drivers, to be assessed.[13]

Table 2 includes the needs identified in table 1 together with a wider range of needs for other habitats, for connection and access to nature and for ancillary costs required to achieve effective outcomes, in terms of capacity, expertise, advice and enforcement.

Table 2. Overall estimated Annual Financing needs for priority areas[14]

NATURE RESTORATION		
	England	UK
Freshwater bodies *(Environment Bill, 25YEP)*		
River basin management	£564m	(not accounted for)
Catchment-based approach	£4.8m	(not accounted for)
Terrestriel/land management *(Environment Bill, 25YEP, 30x30, Net Zero)*		
Priority habitats, species recovery, boundary features, historic environment, arable, grassland, organic (This includes *from* the spending needs outlined in Table 1 *+ grassland, arable, organic and broader boundary features*)	£1.934bn	£3.551bn (including England)
Darwin Fund for Overseas Territories		£10m
Marine (*25YEP; UK Marine Strategy; 30x30; Net Zero*)		
Restoring and protecting Marine Protected Areas	n/a	£90m
Seagrass restoration and the ReMeMare project	n/a	£16.5m
TOTAL £4.226bn p.a. (approx.)		

ACCESS TO NATURE		
	England	UK
Access to nature (*25YEP*)		£1.83bn (£5.5bn over three years initially)
TOTAL £1.83bn p.a. (approx.)		

ADVICE, ENFORCEMENT AND CAPACITY-BUILDING		
	England	UK
Natural England	£389m	
Environment Agency	£100m	
LNRS	£21.3m	

[13] assessing-the-costs-of-environmental-land-management-in-the-uk-final-report-dec-2017.pdf

[14] See annex 1 for exact calculations

(*Environment Bill*)		
Biodiversity Net Gain (*Environment Bill*)	£43m	
Farming and land management advice, training	£173m	(£392m)
Green jobs and skills (*Levelling up; Overarching*)	£1.5m (or £4.5m one-off)	
AONBs (additional funding will be needed for National Parks) (30x30, 25 YEP, Environment Bill, Agriculture Bill/ELM)	£13.4m	
International Whaling Commission		£50k (international)
Animal Sentience Committee ((*Animal Welfare Action Plan; Animal Sentience Bill*)	£500k	
National Wildlife Crime Unit (*Animal Welfare Action Plan; Animal Sentience Bill*)	£450k	
Biosecurity (*25YEP*)		£6m
TOTAL £748m p.a. (approx.)		

The funding gap

The total estimated requirement is therefore £6.8bn a year can be met through (1) public investment; (2) private investment; and (3) action by charities (and communities). We also believe the uplift in English Agency budgets will require equivalent increases in devolved agency and departmental budgets. In the years ahead, there is potential for large-scale private sector investment in nature if responsibility for delivery of the new statutory nature targets is properly attributed to responsible sectors. At the moment, however, private investment is limited. There may also be gaps in future private funding for nature, but where investment is essential, therefore Government must set the tone and demonstrate where private investment it needed

In recent years, the scale of environmental NGO investment in nature has grown. According to JNCC, spending on biodiversity in the UK by non-governmental organisations was £258 million (net of government funding) in 2018/19. This represents real-term increase of 36% since 2010/11. However, the coronavirus crisis has severely affected charities' finances. Around 2/3 of organisations that deliver nature restoration have had to reduce the number of projects they deliver, some by up to a quarter, with an average reduction of 14% in the number of projects being carried out in 2021/22. These financial effects are expected to last for a number of years and so we assume that overall investment is likely to remain at around the 2018/19 level under an optimistic scenario.

Government spending is less than £500m p.a. on direct conservation activities. Recent additions such as the £640m Nature for Climate Fund, though welcome, will be spread out over five years, and will only focus on woods and trees, with some small spending on peatlands, and doesn't cover other vital habitats. It is also England-only funding. We would welcome the creation of a successor Nature for Climate Fund, which would focus on a range of habitats including and beyond peatland and woodland such as wetlands, species rich grassland, saltmarsh and more. Protection and restoration of permanent, species-rich grasslands will deliver critical carbon stores, healthy ecosystems and extensive livestock grazing to deliver the Government's commitments to net zero emissions, nature's recovery and sustainable food production.

The Government has committed to maintain the overall food and farming budget of c.£2.4bn per year in England for the duration of the Parliament. The future direction of spend, focused on environmental public goods, is extremely positive. However, in the next CSR period only a portion of that spend is dedicated to environmental improvement: £870m rising to £1.4bn—an average of £1.093bn per year.

During the SR period, the design of environmental land management programmes will still be underway and it is safe to assume that not all of the £1bn annual spend notionally dedicated to environmental improvement will deliver real results for the environment.

Some of DEFRA's existing departmental budget (c.£5.9bn) could be re-prioritised to focus on direct environmental delivery. However, effective implementation of new programmes such as environmental gain and LNRSs, as well as spending on post-Brexit changes, are likely to mean that flexibility within current budgets is limited, especially with major components of the budget ringfenced.

Taking these and other government spending considerations into account, we find a funding gap[15] of:

- £2.262bn p.a. for direct investment in delivery on the ground for nature (terrestrial, freshwater and marine) across England and the rest of UK
- £1.83bn (£5.5bn minimum over 3 years) for an accelerator fund for connecting people with nature across the UK. Currently there is no such provision for access to nature.
- At least £501m p.a. for policy implementation and supporting services in England, the UK and internationally.

[15] These figures are combination of funding gaps in England, and funding gaps for the whole of the UK. We have not accounted for all UK policies and environmental spends, as many of these areas are devolved

4. Direct Government investment

While we support the Government's approach to leveraging greater private sector finance to support environmental goals, there remain areas of delivery, particularly in relation to public goods (like biodiversity, priority habitats, species recovery, and the foundational costs of establishing new, effective, market approaches) which will not be covered by private markets and should be funded by Government. There is also an expectation that in future, ELM will deliver significantly against climate and environmental commitments, however over this SR period it will not have the policy, uptake or funding in place to start delivering. Investments in nature are often low-cost, value for money, as they create resilience in our economies. **In sum, in the next Spending Review period before new policies take effect, a major spending gap remains.**

In this section, we take the figures from section 3 and propose areas for priority government spending over this Spending Review period, taking into account our best estimates of existing budgets and expenditure.

We propose three strategic priorities for environmental investment in SR 2021. These investments could either be met through central government funding commitments or through specifically ringfencing a proportion of the £15bn anticipated to be raised through new green gilt issues. After taking into consideration current government spending, the additional spending that we recommend is as follows:

1. **Restoring and protecting habitats and species to halt the decline of nature by 2030: an additional £2.262bn is needed across the UK**

   This includes:
   - An additional £1.599bn p.a. additional (UK-wide) for species recovery, priority habitats, boundary features and other habitats to restore 270,729ha and expand 81,458ha of priority habitat UK-wide per year, including species-rich grasslands, peatland, woodland and saltmarsh.
   - An additional £567m for the freshwater environments in England to meet Environment Bill commitments and to mitigate flooding.[16]
   - An additional £95.5m p.a. to restore and manage Marine Protected areas in UK waters, whilst enhancing vital and lost marine habitats such as seagrass.

2. **Providing health and wellbeing benefits through access to nature: at-least an initial £1.83bn (£5.5bn over a three-year period)**

This includes:
- An initial accelerator fund for the three-year spending period which will provide £200bn in healthcare benefits, an estimated 40,000 jobs, and provide 3,500 deprived neighbourhoods across the UK with access to greenspaces where people live and work.

3. **Underpinning our environmental commitments through advice, enforcement, data and capacity-building: an additional £501m per year**

[16] While not costed, we assume there will be equivalent needs for the devolved nations.

This includes:

- An additional £191m p.a. for Natural England to carry out its statutory duties and take on new burdens such as Environment Bill targets.
- An additional £60m p.a. for the Environment Agency to carry out its basic duties of advice and enforcement.[17]
- A fund of £173m p.a. for farming and land management advice, training and support in England (£388m across the UK).
- £43m p.a. for Local Planning Authorities' capacity building in advance of Biodiversity Net Gain.
- An additional £20.3m p.a. for LNRS operational costs
- An additional £6.7m p.a. for AONBs management and running costs to ensure they have the tools needed to deliver against the 25YEP, Leaders' Pledge for Nature, Environment Bill goals and Net Zero and to fulfil Glover Review recommendations. Additional funding will be needed for National Parks.
- An additional £5.1m p.a. funding for tackling biosecurity and invasive non-native species.
- A one-off fund of £4.5m for a National Nature Service pilot to secure long-term job creation in the nature sector
- £500k p.a. for an Animal Sentience Committee to oversee the delivery of the Animal Welfare Action Plan and subsequent Animal Sentience Bill
- An additional £75k p.a. to support the National Wildlife Crime Unit to carry out its duties in tackling wildlife crime
- £50k p.a. to support the International Whaling Commission in order to place the UK as a driving force for animal welfare globally.

4.1 Restoring and protecting habitats and species to halt the decline of nature by 2030: an additional £2.262bn is needed across the UK

The breaks down into the following spending asks:

i. An additional £1.599bn p.a. additional (UK-wide) for species recovery, priority habitats, hedgerows and other habitats to restore 270,729ha and expand 81,458ha of priority habitat UK-wide per year, including species-rich grasslands, peatland, woodland and saltmarsh

Issue	bn/yr needed England	bn/yr needed UK	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Land management (including priority habitats, species, boundary features, historic env, arable,	1.934	3.551 (including England)	1.952	1.599	Additional funding needed for species recovery over next three years to hit the 2030 nature target & 30x30. Also need to meet 25YEP target 75% SSSIs favourable condition	Govt spend- what is accounted for: £473m govt spend JNCC 2018/19 + NGO biodiversity spend of £258m farming budget of 'environmental and animal welfare outcomes' aver p.a. budget of £1.093bn = £1.824bn

[17] Whilst not costed, we assume devolved agencies and departments will need equivalent budgetary increases.

grassland, organic)						Nature for Climate fund £128m p.a. TOTAL= £1.952bn*,** * (we haven't accounted for devolved farming spend because most of this is likely to go on BPS and we don't have the breakdown of spend on environmental outcomes. If included, Government spend would be = £2.949bn ** This figure does not include/account for advice and training.
Darwin fund for Overseas Territories	n/a	0.01	0.01	0	To continue the Darwin project	Govt commitment at SR2020 was £10m and this should be committed to again in SR2021-2024

Costings:

According to updated costings, based on the Rayment model created for RSPB, The Wildlife Trusts and the National Trust, the total funding needed for species recovery, priority habitats, hedgerows and widespread species is £1.002bn p.a. in England, £1.809bn p.a. UK-wide (see Table 1)[18]. When other boundary features, arable land, grassland and organic are considered, the total land management budget needed in England is £1.934bn and £3.551 for the UK respectively. Table 3 shows the overall estimated costs for priority habitats, boundary features, the historic environment, grassland management, arable and organic. This is the total amount of money that we estimate is needed for environmental delivery terrestrially (discounting freshwater) per year:

Table 3: estimate of the overall costs of environmental land management measures, Matt Rayment 2021

	Based on adjusted cost drivers					
	£m per annum					
Land management costs						
	England	**Northern Ireland**	**Scotland**	**Wales**	**UK**	
Priority habitats	663	55	519	150	**1,387**	39%
Boundary features	333	69	87	59	**547**	15%
Historic environment	56	4	43	9	**112**	3%
Arable land	520	26	173	12	**731**	21%
Grassland	345	129	206	69	**748**	21%

[18] https://www.wildlifetrusts.org/sites/default/files/2019-09/Paying%20for%20public%20goods%20final%20report.pdf

Organic	17	0	3	5	**26**	1%
Total land management	**1,934**	**283**	**1,030**	**304**	**3,551**	100%

Table 4 below compares the current food and farming annual spend on what Defra calls 'environmental and animal welfare outcomes'[19] with the costed figure of £2.1bn. It finds that there is a £1.23bn funding gap in 2022/2023, a £1.09bn gap in 2023/2024 and a £700m funding gap for 2024/2025.

Table 4. Current Food and Farming budget in England for environmental and animal welfare outcome compared with overall budgetary need for environmental outcomes p.a.

Total budget needed for delivery on land of environmental outcomes per year = £1.934bn Total budget needed for advice, securing HNV farming, and other incentives = £172m Total=£2.106bn[1],[2],[3]		
Spending year	Allocated budget for environment and animal welfare outcomes (approx.) [6]	Funding gap before (approx) (only including FFCP environment budget, excludes nature for climate)
2022/2023	£870m	<£1.23bn[3]
2023/2024	£1.01bn	<£1.09bn[4]
2024/2025	£1.4bn	<£700m[5]
	Average (mean)= £1.093bn	Average (mean)= £1.007bn

[1]From updated Matt Rayment model 2021
[2]Figure excludes £ needed for access, heritage, freshwater Figure includes
[3]priority habitats, boundary features, historic environment; arable land, grassland, organic, advice, securing vulnerable high nature value farming, business advice to HNV farms, securing long-term changes in land use
[4] < because some of the budget will go on animal health & welfare outcomes that do not impact species recovery, so these are underestimates.
[4]< because some of the budget will go on animal health & welfare outcomes that do not impact species recovery, so these are underestimates.
[5] < because some of the budget will go on animal health & welfare outcomes that do not impact species recovery, so these are underestimates.
[6] p/a expenditure taken from Ag transition plan = average expenditure of p/a on 'environmental and animal welfare outcomes' between 2022-2024.

According to the latest JNCC figures from 2018/2019, **government** spend on biodiversity is approximately £473m, which is accounted for here.[20] Spending on biodiversity in the UK by non-governmental organisations (NGOs) with a focus on biodiversity and/or nature conservation was £258 million (net of government funding) in 2018/19.[21] **Also** accounted for is the Nature **f**or Climate **F**und which we estimate will provide an average of £128m per year to woodlands and peatlands combined. Finally, this accounts for the £10m committed to the Darwin **Initiative** fund for overseas territories, which we would like to see increased to £30m per year.

[19] The Path to Sustainable Agriculture: an agricultural transition plan 2021 to 2024, Defra (2020)
[20] https://jncc.gov.uk/our-work/ukbi-e2-biodiversity-expenditure/#key-results-figure-e2ii-uk-public-sector-expenditure-on-international-biodiversity-200102-to-201819
[21] https://jncc.gov.uk/our-work/ukbi-e2-biodiversity-expenditure/#key-results-figure-e2ii-uk-public-sector-expenditure-on-international-biodiversity-200102-to-201819

This leaves a funding gap of £1.599bn p.a. additional (UK-wide) for species recovery, priority habitats, hedgerows and widespread species, which will restore 270,729ha and expand 81,458ha of priority habitat UK-wide per year, including species-rich grasslands, peatland, woodland, saltmarsh.[22]

Not accounted for is government spend on food & farming in Northern Ireland (£315m), Scotland (£570m) or Wales (£240m).[23] This is because much of this budget may still be spent on direct payments, not on environmental delivery. We did not have sufficient breakdown of spending for each devolved nation to account for this.

Why we need it:

The Government's commitment to amend the Environment Bill to include a legally binding target for species abundance for 2030 presents the opportunity to turn the tide on species and habitat decline. However, this relies on the success of the Government's proposed England Species Reintroduction Taskforce announced earlier this year. This taskforce aims to bring together experts, landowners and NGOs to build collaborative projects for the recovery and restoration of iconic species in England. To meet this 2030 target, at least £1.336 billion a year additional funding is needed over the next three years.

An investment in vital habitats will strengthen economic resilience. For instance, the Natural Capital Committee identify 'a good economic case for expanding the extent of wetland areas by around 100,000ha' to deliver the goals of the 25 Year Environment Plan 9. The Committee notes the benefits costs ratio of such wetland creation can be as high as 9:110[24].

Environmentally protected areas are our most effective way to safeguard and restore the natural world. In the 25 Year Environment Plan, the Government made commitments to restore 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, as well as creating and restoring 500,000 hectares of wildlife-rich habitat outside the protected site network. The SR presents an opportunity for the Government to calcify investment in the delivery and restoration of key habitats.

The Lawton Review found that many of England's wildlife sites are too small, with 77% of SSSIs smaller than 100 hectares[25]. Losses of certain habitats have been so great that the area remaining is no longer enough to halt additional biodiversity losses without concerted efforts. Many of the natural connections in our countryside have been degraded or lost, leading to the isolation of sites. These observations apply equally to the rest of the UK. As it stands currently, less than 40% of Britain's SSSI's (or equivalent) are in favourable condition.[26] For the Government to restore 75% of terrestrial habitats, an additional £1.599bn p.a. is needed throughout the UK. This can be made through agricultural and other land-based payments between now and 2024, before the new ELM system is rolled out in full. Alongside this, Natural England needs to be resourced to ensure SSSIs are being protected, restored, managed and monitored (see separate section on resourcing Natural England). With 63% of SSSIs inside National Parks and AONBs, increasing funding for those landscapes to deliver nature conservation outcomes will

[22] Matt R- cite

[23] https://www.gov.uk/government/publications/spending-review-2020-documents/spending-review-2020

[24] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/677872/ncc-advice-on-25-year-environment-plan-180131.pdf

[25] https://webarchive.nationalarchives.gov.uk/ukgwa/20130402151656/http:/archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf

[26] https://www.wcl.org.uk/docs/WCL_Achieving_30x30_Land_and_Sea_Report.pdf

help drive progress on the Government's target to reach 75% favourable (see separate section on resourcing National Park and AONB authorities).

Climate change and the degradation of nature are also inextricably linked, so a cost-effective way to mitigate their impacts is to combine investment in activities which address both. Tree-planting, restoration of permanent species-rich grasslands, wetlands and other habitats can contribute a significant proportion of the effort required to meet Net Zero, balancing out greenhouse gases from sectors that cannot completely eliminate their emissions. Many habitats take years to reach their potential as sinks and so action should begin in this SR period.

Re-committing to Overseas Territories

The UK government has committed to supporting the extraordinary natural environments of the British Overseas Territories. The UK retains liability for natural disasters in the Territories, such as the damage inflicted by hurricane Irma in 2017. At the spring 2020 Budget the Chancellor therefore committed to trebling financial support under the Darwin Initiative to £10m per year. It is essential that this is not lost and a recommitment to this support is made under the CSR. Without this the Territories will be less able to tackle the problems, and offer positive nature-based solutions, to climate change and wildlife loss.

i. £567.2m for the freshwater environment to meet Environment Bill commitments and to mitigate flooding

1. £564m per year to support Environment Bill commitments on the freshwater environment

Issue	bn/yr needed England	bn/yr needed UK	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Water Targets (WFD)	0.564	0.564	0*	0.564	Meet water targets under Env Bill and fulfil 25YEP commitments	*Govt funding for flooding & water more broadly= £524m in capital, not clear how much on current WFD: see p. 27 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818433/defra-annual-report-2018-2019.pdf

Costings:

The table below from the most recent 'Update to the river basin management plans for England's water environment' impact assessment (2015), estimate a £17.5bn present value cost to 2052 per year = £0.564bn per annum. It assumes 75% of waterbodies reach good ecological status by 2027 as per the 25YEP target.

The total benefits accruing from this investment are £22.5bn between 2015-2052, or otherwise £605m per year.

Table B1: Environment Agency table of costs and benefits to varying levels of capital investment in freshwater habitats:

Table B1: comparison of 2014 and 2015 economic analysis

£m	Baseline option (Scenario 3) 2014 analysis	Baseline option 2015 analysis	Proposed option (Scenario 4) 2014 analysis	Proposed option 2015 analysis
PV Costs	16,100	26,800	12,100	17,500
PV Benefits	21,000	23,300	20,600	22,500
NPV	+5,000	-3,600	+8,400	+5,000

Update to the river basin management plans for England's water environment' impact assessment, Environment Agency (2015)[27]

We could not find the exact current expenditure on the freshwater environment, so £564m is likely to be an overestimate. However, this does show the scale of need for the freshwater environment.

Why we need it:

Our freshwater environment is fragmented, polluted and degraded, with 200,000ha of priority wetland habitat currently in poor condition. To bring about nature's recovery, the future needs to be one of vibrant, much bigger and better-connected aquatic landscapes that are resilient to climate change. Current estimates of floodplain land use in England and Wales indicate that nearly 70% is under intensive agricultural use (arable and horticultural crops, or intensive grassland), whilst a mere 11% supports semi-natural habitats. Restoring just 3/4s of rivers, lakes and wetlands in England to good ecological status by 2027 would boost the economy by a total of £8.4 billion through increased tourism, improved flood resilience, and enhanced quality of life[28]. Carbon sequestration (i.e. Blue Carbon) is also a vital ecosystem service of blue spaces; investment in them would help the UK to reach its net zero target.

Habitat restoration and creation of water habitats is needed within much widened and renaturalised river corridors and across better connected wetland landscapes. From enhancing protected sites through to working in our farmed countryside, we need to ensure that existing wetlands, including ponds and headwater wetlands, are better cared for, and we need to be ambitious and ensure that there is even more clean-water wetland habitat in the wider countryside.

To do so, targets for wetland creation and restoration should be set in the new Nature Strategy and River Basin Management Plans and funded through this SR. This should include the creation or restoration of priority wetland habitat in England, with a strong focus on habitat creation in river valleys (headwaters, floodplains, and pond creation). The Natural Capital Committee have shown that wetland creation can have benefit cost ratios as high as 9:1[1], with investment generating economic returns

27 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470925/Impact_assessment_update_to_the_RBMPs_for_England_s_water_environment__2015_.pdf

28 http://www.bawag.co.uk/1/documents/economic-analysis-extended-report.pdf

equal to or exceeding investment in many other capital infrastructure, such as road and rail projects. A Valuing Nature report which examined the natural capital of floodplains found that the ecosystem-service benefits provided by species-rich habitats far outweigh those provided by land in intensive agriculture.[29]

2. £3.2m additional p.a.to support 100+ river catchments across England to mitigate flood risk and improve water, soil and air quality

Issue	bn/yr needed England	bn/yr needed UK	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Water (CaBa)	0.0048	n/a	0.0016	0.0032	Centrally the support has varied over the years but is generally between £200K and £300K. This is for the central Steering Group and Working groups that do stuff to support CaBA as a whole.	Currently partnerships get £15K for a whole catchment (or a portion for a sub catchment) and there are 105 altogether (some whole, some sub). In total Defra indeed spend ~£1.4m on hosting costs. Current: £15,000 x 93.5 = £1,402,500 plus central £200,000 = £1,602,500 Double: £30,000 x 93.5 = £2,805,000 plus central £400,000 = £3,205,000 Treble: £45,000 x 93.5 = £4,207,500 plus central £600,000 = £4,807,500

Costings:

Currently partnerships get £15K for a whole catchment (or a portion for a sub catchment) and there are 105 altogether. In total Defra indeed spend ~£1.4m on hosting costs.

The previous benefits report for 18/19 gives an actual figure: "CaBA partnerships receive funding each year to cover the costs of hosting and running the partnerships, which in 2018/19 totalled £1,402,500". This averages at £93.5k 'FTE partnerships'. Centrally the support has varied over the years but is generally between £200K and £300K. This is for the central Steering Group and Working groups that do stuff to support CaBA as a whole. To treble the core funding of Catchment-based partnerships, we need:

Current: £15,000 x 93.5 = £1,402,500 plus central £200,000 = **£1,602,500**

Double: £30,000 x 93.5 = £2,805,000 plus central £400,000 = **£3,205,000**

Treble: £45,000 x 93.5 = £4,207,500 plus central £600,000 = **£4,807,500**

Why we need it:

The catchment-based approach (CaBA) initiative provides the foundations for a consistent framework for on-the-ground delivery across the 105 river catchments in England. To strengthen the partnership

[29] https://valuing-nature.net/sites/default/files/documents/Synthesis_reports/VNP09-NatCapSynthesisReport-Floodplains-A4-16pp-144dpi.pdf

with the Environment Agency, Natural England and the private sector for on-the-ground outcomes to successfully address the climate and nature crises, CaBA needs to receive treble the amount of current funding, secured across multiple years to be utilised by local catchment partnerships. This funding increase will deliver multi-benefit outcomes including improving community engagement, restoring catchments, improving community health and well-being, and delivering clean and plentiful water. [30]

Catchment-based partnerships deliver a whole range of benefits to the wider environment, but particularly freshwater ecosystems. Centrally the support has varied over the years but is generally between £200K and £300K. This is for the central Steering Group and Working groups that support CaBA as a whole.

ii. An additional £95.5m p.a. to restore and manage Marine Protected Areas, whilst enhancing vital and lost marine habitats such as seagrass

1. £84m additional p.a. for marine protected areas (MPAs)

Issue	bn/yr needed England	bn/yr needed UK	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Marine- all MPAs to get to good environmental status	n/a	0.09	0.006	0.084	To meet 25YEP commitment to get MPAs to good environmental status	Expenditure figure only accounts for the funding for the Marine Management Organisation from 2020/2021

Costings:

To meet Government commitments in the 25 Year Environment Plan, £90m per year is needed to get Marine Protected Areas (MPAs) to good environmental status. The provision of adequate MPA management requires appropriate funding of the Marine Management Organisation (MMO), who currently have a budget of £28,748,000. In addition, the 10 Inshore Fisheries and Conservation Authorities (IFCAs) have received £3 million New Burdens funding each year since 2011 for the delivery of marine protection.

Evidence shows that the MMO budget for Marine Nature Conservation and Coastal Operations was around £6m in 2013/14[31]. Our estimate of £90m comes from an extrapolation from a UK Seas study done in 2018[32], which finds that in terms of generic management, a typical MPA may require between £400k and £900k as one-off establishment costs This estimate excludes any research costs that are

[30] LINK BLUEPRINT 2022021 CSR SUBMISSION

[31] https://consult.defra.gov.uk/triennial-reviews/triennial-review-mmo/supporting_documents/Summary%20of%20MMO%20Activities.pdf

[32] https://ukseasproject.org.uk/cms-data/reports/North%20Devon%20Marine%20Protected%20Areas%20Cost%20Evaluation%20-%20%20Final%20Report.pdf

above and beyond the baseline survey. Recurring resource of up to 4 FTE and running costs of up to £200k per year. This assessment does not include the costs of any MPA specific measures, nor does it include area wide enforcement (e.g. by MMO and IFCAs). These indicative costs compare with the current average spend of £44k across all six MPAs within the North Devon marine area. This leaves a total *additional* spending need of £84m p.a, which would total £90m overall spend.

Why we need it:

While designations of MPAs have resulted in 40% of English seas under some form of protection, management is severely lacking. Indeed, only around 10% of seas have fully implemented management measures and only 13% of MPAs have monitoring plans in place. To ensure that our seas are recovering, and to deliver the Government's proposed programme of 'Highly Protected Marine Areas', we recommend a £90 million per year budget uplift to introduce effective management measures to all English MPAs and implement Remote Electronic Monitoring on fishing vessels.

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This will be essential to meet the Government's 30x30 target as no MPA could be considered as protected for nature without management and monitoring.

Observer coverage on fishing vessels is at less than 1% and is constrained by staff and financial resources. Remote Electronic Monitoring with cameras (REM) on vessels has been shown to be a cost-effective way to supplement observer data collection. In 2017 WWF calculated that full REM costs per vessel per year were £3785 (with EMFF grant subsidy) or £5290 (without EMFF subsidy).[33] For the current 1,276 over 10m vessels in the UK (as a start), this equates to between £4.8 and £6.75million. That is less than 1% of the value of the seafood caught by these boats and a fraction of the £20m or more that is spent on current monitoring. With REM costs also decreasing year on year, the technology represents an excellent investment into the health of our seas.

Management of Marine Protected Areas is the responsibility of the Marine Management Organisation and the Inshore Fisheries and Conservation Authorities in England. This funding will cover cost-effective means of gaining better information on fishing activity – a key requirement to enable world leading fisheries management. Additional funding will also enable these organisations to fulfil new burdens including new regulations for offshore MPAs and fisheries post-Brexit and the introduction of Highly Protected Marine Areas.

[33] https://www.wwf.org.uk/sites/default/files/2017-10/Remote%20Electronic%20Monitoring%20in%20UK%20Fisheries%20Management_WWF.pdf

2. £11.5m additional p.a. for restoring 127.5ha of seagrass by 2024, helping to store carbon and reach net zero while creating viable jobs

Issue	bn/yr needed England	bn/yr needed UK	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Marine (seagrass + RemMeMare)	n/a	0.0165	0.005	0.0115	Restoring the UK's priority coastal habitats; Supporting and expanding the ReMeMaRe project	ReMeMare project ask= £8m Seagrass restoration of 12.5ha over three years= £8.5m p.a. NB EA project only runs until 2023- Current govt expenditure from EA project: https://www.gov.uk/government/news/new-25-million-project-launched-to-restore-fragile-marine-habitats

Costings:

While this costing is for seagrass restoration alone (saltmarsh restoration is accounted for under 4.1.i), there is a need long-term to take a holistic approach to coastal priority habitat restoration, rather than only focussing on specific habitats.

To-date Government funding has failed to catch up with the emerging scientific evidence around the wider benefits of protecting blue carbon ecosystems. Additional funding should be delivered to:

- Restore 127.5ha of the UK's seagrass habitats by 2024: This is 10% of the total 1275ha of seagrass restoration that is needed across the UK. Based on current WWF research, using current techniques 10ha of seagrass can be restored at a cost of £2 million, but new mechanical techniques for seagrass planting could reduce these costs substantially. This amounts to £25.5m until 2024 or £8.5m a year. Taking into account the £25 million Environment Agency seagrass project, running from 2020-2023-which amounts to roughly £5m per year-, this leaves an additional approximate cost of £4.5m per year needed for seagrass restoration.
- Supporting and expanding the ReMeMaRe project: ReMeMaRe is an Environment Agency initiative that aims to reverse centuries of decline of our estuarine and coastal habitats by Restoring [seagrass] Meadows, [salt] Marsh and [oyster] Reef. The project has funding for restoration of 800 ha of saltmarshes, 25 ha of seagrass meadows and 50 ha oyster beds, plus a pilot study for restoring 2 ha of kelp forests. They also have £4m for the setup of aquaculture facilities that will be able to scale-up production of oyster seed and seagrass seedling required for realising the ambition of ReMeMaRe to restore 15 % of our estuarine and coastal habitats by 2043. The project is aiming to secure an additional £24 million of resources towards estuarine and coastal restoration, which will achieve the total target of 875 ha restore. Split over three years, this equates to around £8m per year between now and 2024. Rather than the EA embarking on an extended process of fundraising from NGOs and the private sector, the Government should deliver this investment to ensure that this restoration work can be undertaken as soon as possible.

Why we need it:

The marine and coastal environment offers substantial potential for carbon sequestration at the same time as enhancing biodiversity. Three blue carbon habitats in UK waters - saltmarsh, sublittoral (sub-tidal) sands, and sublittoral muds - have been estimated to capture 'between 10.5 and 60.1 million tonnes of carbon dioxide equivalent per year'[4]. The amount of carbon removed from our atmosphere by these ecosystems, in one year, has an estimated value of between £742 million and £4,259 million. Ministers have highlighted the important role that blue carbon habitats – such as saltmarsh and seagrass - can play to prevent biodiversity loss and support adaptation and resilience to climate change, alongside carbon sequestration benefits[34]. In the year of COP26, increased investment in the UK's blue carbon ecosystems would demonstrate international leadership. The Spending Review could ensure that the UK sets a strong example in this area, leading the way for others to also protect these important ecosystems.

4.2 To deliver benefits for health and wellbeing across England, at-least an initial £5.5bn is needed over a three-year period

Issue	bn/yr needed England	bn/yr needed UK	Govt commitment bn/yr	Remaining required bn/yr	Why it's needed
Access to urban green space (NT)		1.83			A total of £5.5bn investment over three years would bring £200 billion in health and wellbeing benefits. Estimated 40,000 jobs in initial construction and over 6,000 created permanently for ongoing maintenance.
TOTAL		1.83		1.83	

Costings:

For an initial accelerator investment of £5.5bn (or £1.83bn per year for three years), 3,500 deprived neighbourhoods will benefit from:

- 10,000 km of streets planted with trees
- 155 new neighbourhood and 600 street parks created
- 2,700 miles of England Coast Path managed and promoted to be accessible to all

Improved access for:

- 20 million people to upgraded green spaces
- 15 million people to new neighbourhood green spaces and greener streets
- 7 million people to a national park experience

[34] https://questions-statements.parliament.uk/written-questions/detail/2021-02-01/147049

- 29 million walking trips on the England Coast Path

In addition, across Great Britain:

- 9,200 parks upgraded
- 750 km2 of peri-urban parks created

And:

- An estimated 40,000 jobs created in initial construction and over 6,000 created permanently for ongoing maintenance

Not included in this costing:

- Cost for creating better access to blue spaces such as coastal waters and rivers.
- Cost of access provisions across rural areas needed to level up rural access
- Cost of additional urban access provision. Friends of the Earth identified 1,108 E-rated neighbourhoods in England comprising 9.6 million people (1 in 5 of England's population). In these areas, the per capita public green space was less than 9m2, and an average of 20m2 gardens and the vast majority more than 5 minutes' walk from 2 hectares of public green space i.e. not meeting Natural England's accessible greenspace standards.

Given that green space is a cross-departmental issues, and Defra's budget is limited, DHSC, DWP, MHCLG and others must contribute to the creation and upkeep of high quality green space. This could be done via:

- Joint commissioning by a National Nature Service
- Contribution to the accelerator fund - which could make a big contribution to levelling up

Why we need it:

Enabling more people to access and connect with nature where they live and work has never been more important. Access to high quality green and blue space close to where people live is proven to significantly improve health and wellbeing. The coronavirus pandemic has seen a large surge in people's use of parks and green spaces, with an increase of 25% between May 2020 and May 2018[35]. Yet Covid-19 also exposed the deep inequalities linked to access to green spaces, with evidence indicating that in areas where over 40% of residents were from ethnic minorities there is 11 times less public green spaces than in areas where residents are largely white[36]. Targeting interventions on the areas where economic deprivation, poor health outcomes, and low environmental quality overlap could identify a small number of areas where investment could provide health benefits and improve productivity for millions of people. A minimum of £5.5.bn a year should act as an accelerator fund to level up access to nature across the UK.

This fund, whilst limited in scope, will go some way towards the creation of equitable, joined up natural spaces. However, there are currently gaps between National Trust's research37 referenced

[35] https://www.nationaltrust.org.uk/press-release/new-research-shows-55bn-fund-needed-to-level-up-access-to-urban-green-space-as-part-of-uks-green-recovery

[36] https://www.nationaltrust.org.uk/press-release/new-research-shows-55bn-fund-needed-to-level-up-access-to-urban-green-space-as-part-of-uks-green-recovery

[37] https://www.nationaltrust.org.uk/press-release/new-research-shows-55bn-fund-needed-to-level-up-access-to-urban-green-space-as-part-of-uks-green-recovery

above, which identified 295 deprived [38] of 440,000 people, and Friends of The Earth (FoE) research, which identified over 1000 with almost 10 million people (which were rated E[39]). £5.5bn accounts for some targeted interventions in areas of economic deprivation, we acknowledge that there is a need for additional funding to ensure the neighbourhoods identified by Friends of the Earth are not left behind in the Government's plan to build back better.

For the Government to keep its commitment to expanding access in the 25 Year Environment Plan, the spending review should aim to create wider access across both rural and coastal landscapes as well as urban green spaces. Rivers, streams, ponds and other water bodies can provide access to nature in places that are otherwise difficult to reach, bringing corridors of wildlife into communities. Restored species-rich floodplain meadows near villages, towns and cities will provide locally accessible and inspirational green space for environmental education, physical and mental health and well-being, helping to reconnect people with nature, and provide unique mental health benefits [40].In evolving from CAP to ELM we have the greatest opportunity since the Countryside Rights of Way (CROW) Act of 2000 to do this. Now is the time to be building a countryside that makes space for people and nature.

4.3 To ensure the right advice, capacity-building, data and enforcement mechanisms are in place for nature, people and planet, and an additional £501m is needed per year

In this critical period for nature, the government must ensure the current regulatory systems, mechanisms and enforcement bodies in place are adequately financed to ensure the right advice, capacity and enforcement mechanisms are in place to support our natural world.

i. An additional £191mp.a. for Natural England to carry out statutory duties

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Natural England	0.389	0.198	0.191	Increase Natural England's advisory capacity to deliver a large-scale expansion in advisory services in readiness for ELM. Increase NE's capacity so they are able to a) fulfil their statutory duties with regard to protected sites and b) drive nature's recovery according to the 25 Year Environment Plan, not just prevent further decline.	Natural England is unable to fulfil statutory duties such as monitoring of SSSIs. On top of investment in these existing statutory duties, public bodies will need new investment to support and deliver key elements of the 25 Year Environment Plan. Funding asks from: https://committees.parliament.uk/publications/3453/documents/32928/default/

[38] In Friends of The Earth E rated neighbourhoods the per capita public green space was less than 9m2, and an average of 20m2 gardens and the vast majority more than 5 minutes' walk from 2 hectares of public green space.

[39] https://policy.friendsoftheearth.uk/insight/englands-green-space-gapIn Friends of The Earth E rated neighbourhoods the per capita public green space was less than 9m2, and an average of 20m2 gardens and the vast majority more than 5 minutes' walk from 2 hectares of public green space.

[40] https://www.sciencedirect.com/science/article/abs/pii/S0277953615300630?casa_token=nfqQ5ruYw60AAAAA:xHKEzYG0s9lMqgZCZ912Z1X_6HM96LclnZ8HjDYeJ2SnmDOBGSlNy8HViqb4LOkLdOVpobYcLvZl

Costings:

In a letter to Philip Dunne MP in 2020, Tony Juniper, Chair of Natural England laid out the financial needs of the agency to fulfill its statutory duties:

	2021/22 £m	2022/23 £m	2023/24 £m
Resource	223	256	254
Capital	99	133	152
TOTAL	322	389	406
Relative to 1 April 2020 settlement for 2020/21 budget	+203	+270	+287

Source: Letter from Tony Juniper to Phillip Dunne, Natural England, Nov 2020[41]

When taking into account the budgetary uplift of 47%- totaling the Natural England budget at £198m for this spending year, the remaining budget required is £191m per annum.

Why we need it:

Natural England is unable to properly fulfil statutory duties such as monitoring of SSSIs (78% of SSSIs have not been visited in the last 6 years[42]) and exercising its regulatory tools to secure the good management of SSSIs (Natural England has only used these tools on 9 occasions in the last 20 years, covering 0.2% of SSSIs[43]). The Environment Agency has been forced to cut back water quality monitoring. On top of investment in these existing statutory duties, public bodies will need new investment to support and deliver key elements of the 25 Year Environment Plan including increasing and Natural England's advisory capacity to deliver a large-scale expansion in advisory services in readiness for ELM and increasing it will also increase NE's capacity so they are able to a) fulfil their statutory duties with regard to protected sites and protected landscapes and b) drive nature's recovery according to the 25 Year Environment Plan, not just prevent further decline.

Note, our estimate is for England only. We found no equivalent estimates for devolved country agencies but expect similar challenges. Our estimate should therefore be seen as a minimum requirement. Natural Resources Wales estimate that they face a funding shortfall of £15 mill a year. If NatureScot and Northern Ireland also face similar challenges to those experienced by Natural England the actual need to fulfil existing statutory obligations and duties will be significantly higher than our estimate. We expect any uplift given to English agencies to be lead t equivalent uplift in devolved countries through the Barnett formula.

[41] https://committees.parliament.uk/publications/3453/documents/32928/default/
[42] https://questions-statements.parliament.uk/written-questions/detail/2021-02-09/151834
[43] https://questions-statements.parliament.uk/written-questions/detail/2021-02-09/151836

ii. An additional £60m p.a. for the Environment Agency to carry out its basic duties of advice and enforcement

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Environment Agency	0.1	0.04	0.06	Environment Agency's ability to monitor and enforce water quality regulations is severely limited by lack of funding. This poses major risks to the environment, as well as risks to the Government's statutory obligations. The recent finding of 0% of rivers meeting Good Status is a case in point, alongside widespread public concern about the Agency's ability to uphold water quality rules.	

Costings and why we need it:

This is to raise compliance rates (which are poor/<50% in relation to some regulations/sectors/geographic areas) as close to 100% as possible, with a result that is fair to farmers who already follow the rules and multi-billion pound benefits to the economy annually[44]

The Environment Agency's ability to monitor and enforce water quality regulations is severely limited by lack of funding. This poses major risks to the environment, as well as risks to the Government's statutory obligations. The recent finding of 0% of rivers meeting Good Status is a case in point, alongside widespread public concern about the Agency's ability to uphold water quality rules.

The Government should increase the Environment Agency's enforcement capacity, for example to enable all water bodies to be effectively monitored and reconfigure enforcement of environmental regulations to a more proportionate, advice-led approach. There has been a 52% cut in funding to the Environment Agency's annual budget since 2010 (from £120m to £52m). At the very least, Environment Agency's funding should be returned to 2010 levels[45], amounting to an additional £60m pa.

iii. £173m p.a. for farming and land management advice and training in England (£392m p.a. for the whole of the UK)

Body	bn/yr needed England	Bn/yr needed UK	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes

44 [i] Cranfield University. 2011. Cost of soil degradation in England and Wales. Report for Defra.
[ii] National Audit Office. 2010. Tackling diffuse water pollution in England. Report by the Comptroller and Auditor General. London, National Audit Office. HC 188 Session 2010-2011. Available at: https://www.nao.org.uk/report/tackling-diffuse-water-pollution-in-england/
[iii] Guthrie, Giles, Dunkerley, Tabaqchali, Harshfield, Ioppolo and Manville (2018) The impact of ammonia emissions from agriculture on biodiversity. Rand Europe and The Royal Society. Available at: https://www.rand.org/pubs/research_reports/RR2695.html
[iv] Keeping Us Competitive – A UK Investment Strategy for Net Zero (2020): https://www.wwf.org.uk/sites/default/files/2020-06/Keepingus_competitive.pdf
45 https://www.gov.uk/government/news/letter-to-the-times-from-emma-howard-boyd-chair-of-environment-agency

Farming and land management advice, training etc	0.173	0.392	*	0.173 and 0.392 respectively	To help preparedness for moving to new ELM system + delivery of targeted species and habs work	*govt spend accounted for under point 4.1.i. Breakdown spend of 'environment and animal welfare' budget not publicly available

Costings:

Table 5: summary estimates of the overall costs of the environmental land management measures, Matt Rayment, 2021:

	Based on adjusted cost drivers				
	£m per annum				
	England	**Northern Ireland**	**Scotland**	**Wales**	**UK**
Additional elements					
Environmental land management advice	42	7	30	5	**84**
Securing vulnerable high nature value farming	120	15	101	49	**285**
Business advice to vulnerable HNV farms	3	0	2	1	**6**
Securing long term changes in land use	8	1	6	2	**17**
Sub-total: Additional cost elements	**173**	**23**	**139**	**58**	**392**

Table 5 summarises the costs for advice, securing high-nature value farming, business advice for HNV farms and additional incentives for securing long-term changes in land use in England, Northern Ireland, Wales and Scotland. The table is taken from an updated model of Matt Rayment's 2019 work for RSPB, The Wildlife Trusts and the National Trust on the costs of environmental land management in the UK[46].

Why we need it:

Moving to a new land management system for nature means that farmers and other land managers will need specialist guidance, advice and training to implement the changes and practices we need to see in order to meet binding targets on nature such as those under the Environment Bill and Net Zero, as well as the Leader's Pledge for Nature. Additional incentives will also need to be given to secure vulnerable high nature value farming and to secure long-term changes in land use, to drive land managers and farmers away from other-potentially harmful practices- to ones that are delivering a healthy natural environment as well as healthy and sustainable food.

[46] https://www.wildlifetrusts.org/sites/default/files/2019-09/Paying%20for%20public%20goods%20final%20report.pdf

iv. £43m p.a. for Local Planning Authorities' capacity building in advance of Biodiversity Net Gain

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Net Gain (local authority staffing)	0.043	n/a	0.043	Statutory commitment for local authorities to enforce BNG. Many local authorities lack the capacity and expertise to do this	

Costings:

Local planning authorities will equally play a vital role in supporting net gain delivery and supporting local data capture. In this way, their funding must also reflect the increased capacity they will need to do this. In firm terms, ensure that every Local Authority has access to the following experts:

- Ecologist
- Environmental planner
- Tree officer
- Data manager

Our calculations for this are as follows:

- 1x ecologist w/ salary FTA £37,096 + 30% overheads x 197.6 LAs (upper tier) = £9.5m pa
- 1x strategic planner w/ salary FTA £25,000 + 30% overheads x 197.6 LAs (upper tier) = £6.4m pa
- 1x development manager w/salary FTA £40,000 + 30% overheads x197.6 LAs (upper tier) = 10.3m pa
- 1x data manager w/salary FTA £27,000 + 30% overheads x 197.6 LAs (upper tier) = £7m pa
- 1x tree officer per local authority w/ salary FTA £22,000 + 30% overheads x 343 LAs (lower tier) = £10m pa

Why we need it:

To deliver an effective Biodiversity Net Gain (BNG)system. At both the strategic level and the local level, well-resourced and expert bodies are vital to delivering timely, consistent and good planning decisions for nature, climate, planning applicants and communities. However, planning authorities are currently stretched for capacity and lack sufficient expertise, with 65% having no in-house ecological expertise. The promised resources and skills strategy for the planning sector must be followed by sufficient investments in capacity and expertise (including ecological expertise) to ensure the planning system delivers good outcomes for nature, as well as timely and consistent outcomes for all actors involved. The Government has made a statutory commitment for local authorities to enforce BNG. Currently, many local authorities lack the capacity and expertise to do this.

For £43m per year during this SR period, the outcomes for the planning system will be:

- Reduction in delays to the planning system
- Increased confidence in the effectiveness of regulation
- Better targeting of environmental investment
- Increased productivity and efficiency in the rural economy
- Robust and effective datasets and information to guide decision-making

- Enable identification and control of the risks posed by man-made chemicals to the
- environment and human health
- Empowered, knowledgeable, healthy citizen scientists engaged with their local environment
- and its development
- Helping ensure the roll out and reputation of a flagship government policy?

There should also be ongoing investment into local biological recording centres.

v. An additional £20.3m a p.a. for LNRS operational costs

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
LNRSs	0.0213	0.001	0.0203	With the roll-out of Local Nature Recovery Strategies (LRNSs) planned for April 2022, sufficient resources must be made available to local authorities in the forthcoming Spending Review to ensure that they are successfully delivered.	£38m to set up (includes both direct (£20m) and indirect (£18m) costs. Then an annual £17m to run and review over a five year reporting period. Total is £96m.

Costings:

Overall, we estimate that £38.2m will be required to **properly** set up all the LNRSs. This includes direct costs, such as personnel time, Defra and Defra family resources, access to data and stakeholder engagement (£20.1m), along with indirect costs (£18.1m). The indirect costs are the contribution of NGOs, along with data capital and collection costs (**eg**.. MAGIC). Running costs will be required to cover local authority capacity to ensure that LNRSs are adhered to, delivered, monitored and re-evaluated every five years. This will be £16.4m annually (£6.9m direct costs and £9.5m indirect costs)[47].

Why we need it:

With the roll-out of Local Nature Recovery Strategies (LRNSs) planned for April 2022, sufficient resources must be made available to local authorities in the forthcoming SR to ensure that they are successfully delivered. To address this and, based on discussions with those in the pilots, we have modelled the funding requirements to deliver the LNRSs, which include both direct and indirect resources. Furthermore, for LNRSs to ultimately deliver recovery of nature, they will need to be live documents and so will require ongoing resources to ensure:

- Local planning pays due regard to LNRSs.
- Funding for the recovery of nature is prioritised to opportunity areas identified by LNRSs.
- Ongoing monitoring of delivery of measures and opportunities.
- Reporting back to the Secretary of State and updating LNRSs.

Much of this ongoing funding will be for local authority staffing. This additional resourcing will have multiple other benefits that will include a more timely handling of some key procedures, such as

[47] Resource requirement estimate for LNRSs: Wildlife and Countryside Link, 2021

processing Ecological Impact Assessments for local planning decisions and, therefore, would ultimately be a cost saving.

vi. An additional £6.7m p.a. for AONBs management and running costs to ensure they have the tools needed to deliver against the 25YEP, Leader's Pledge for Nature, Environment Bill goals and Net Zero. Additional funding will be needed for National Parks

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
AONBs funding	0.0134	0.0067	0.0067		Increase recommended by the Glover Review. £75m for National Parks and AONBs was committed to in the 2020/2021 spending review, but unclear where/how/when it will be allocated. This is likely an underestimate due to new burden (30x30), NPs are not accounted for fully and inflation is not accounted for .

Costings and why it's needed:

Many of the most important places for restoring biodiversity and its contributions to people are found inside England's protected landscapes (National Parks and AONBs). For example, they contain 63% of SSSIs and more than half the resource of nine priority habitats are found inside them including upland calcareous grassland, upland heath, blanket bog, upland hay meadows and fens.[48] This is despite them covering less than a quarter of England's land area.

They therefore have great potential to help deliver many of the Government's ambitions for nature restoration in the 25 Year Environment Plan and elsewhere, for example restoring 75% of SSSIs to favourable condition, creating or restoring 500,000 ha of wildlife-rich habitats outside these sites, halting species loss and contributing land that meets the Convention on Biological Diversity's tests for protecting and effectively managing 30% of land important for biodiversity by 2030. They can also contribute to ensuring the success of several Government policies by supporting the development and delivery of Local Nature Recovery Strategies, the Nature Recovery Network, Environmental Land Management and Biodiversity Net Gain.

However, their current funding falls a long way short of what they need to do this and has been cut back over the last decade. This problem is particularly acute for AONBs. Funding for AONB teams has fallen from £11,054,571 in 2005/6 to £6,807,451 in 2019/20, a real-term reduction of 60%[49]. The Glover

[48] Robins, M. (2008) Protected Landscapes – sleeping giants of English biodiversity *ECOS* 29(1).
[49] https://worcestershire.moderngov.co.uk/documents/s29744/7a%20AONB%20Prospectus%202020.pdf

Review found that "the 10 National Parks received £48.7m and the 34 AONBs received £6.7m[50]. Indeed just one National Park, the South Downs, receives several million more on its own than all 34 AONBs combined". The average staff resource of an AONB is only 4 FTE. This is particularly concerning given that AONBs cover a larger area of England (15%) than National Parks (10%).

The Glover Review recommends increasing AONBs' budget "from the current £6.7m to £13.4m". This amounts to an additional £6.7m per year. We strongly support this increase. AONBs have set out how they can help deliver the Government's environmental commitments in their Colchester Declaration but this is contingent on them being appropriately resourced[51]. They have a strong record of making their limited resources go a long way for nature[52] but they do not have what they need to deliver at the pace and scale need to help achieve the Government's commitments.

The £6.7 figure is likely to be an underestimate of need, for example due to new burdens arising from the commitment to protect 30% of land and sea by 2030. As AONBs are likely to be asked to contribute to that target, they must be adequately funded for operational costs.

National Parks have an equally critical role to play. While the Glover Review did not specify an increase in funding, we understand that National Park budgets have also been significantly reduced over the past decade. National Parks have set out their ambitions to meet the Government's target to create or restore 500,000 hectares of wildlife-rich habitat outside the protected site network and have asked for funding to deliver this[53]. They will also need additional funding to help deliver the Government's other commitments. Many individual National Parks have also set out their desire to help support the Government's targets, including Exmoor National Park's nature recovery vision[54]. This level of ambition should be backed with the resources to deliver.

Additional funding will also be needed to deliver other aspects of the Glover Review, including expanding the ranger service to help drive nature's restoration and connect people to these special places.

When National Parks are included, this is likely to be considerably higher. £75m was allocated for National Parks and AONBs in the SR period of 2020/2021. However, this only covers a 1-year SR period, whereas we suggest that National Parks and AONBs receive a boost to yearly funding on a long-term basis to be spent on helping achieve the Government's commitments to recover and connect people to wildlife.

[50] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf

[51] https://landscapesforlife.org.uk/application/files/7216/1117/5782/The_Colchester_Declaration.pdf

[52] See for example the North Pennines AONBs' record of peatland restoration: https://www.northpennines.org.uk/what_we_do/peatland-programme/

[53] https://www.nationalparksengland.org.uk/__data/assets/pdf_file/0030/369318/Delivery-Plan-for-Wildlife-in-National-Parks-FINAL.pdf

[54] https://www.exmoor-nationalpark.gov.uk/about-us/press-room/press-room/news-2020/our-shared-vision-to-restore-nature-on-exmoor

vii. £6m p.a. funding for tackling biosecurity and invasive non-native species

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Invasive species directorate	0.006	0.0009	0.0051	Improving biosecurity to protect and conserve nature	Gov commits to the recommendation of the EAC (Oct 2019) report on INNS, tripling the invasive species biosecurity budget to £3m and providing a further £3 m to form a dedicated invasive species inspectorate

Costings:

The current budget for invasive species biosecurity is £0.9 million, just 0.4% of the overall budget for biosecurity, which includes animal, plant, fish and bee health and invasive species. As result of this chronic underinvestment, it is considerably less effective. Over the past 20 years, three times more invasive species have become established than the combined total of the other four biosecurity regimes.[55] Given the wide-ranging economic and environmental impacts of invasive species, this imbalance requires urgent redress. We propose that investment in invasive species biosecurity is increased to £6 million per year, allocated as follows:

- £3 million to enhance rapid response capabilities, maintain of specialist capacity in the face of emerging invasive threats, and enable more strategic coordination of invasive species control efforts.
- £3 million to fund an invasive species inspectorate that enables more effective pre- and post-border surveillance and better enforcement of invasive species legislation and policy.

Why we need it:

Invasive non-native species are entirely preventable, but are costly when not prevented. For instance, a recent study found that the likely overall cost of Ash Dieback in the UK could be £15bn, and there are at least 47 pests and diseases which, if imported to the UK, could cause damage of at £1bn. With the rise of imported good such as trees (which have increased by £87m in value since 1992), rising important often bring serious new pests and diseases- of which there are at-least 18 in imported trees.

With an increase in budget of £5.1m (totalling £6 million), the GB Non-Native Species Secretariat estimates that, in the next 20 years, the UK could:

- Prevent 24 new species from establishing
- Eradicate 10 existing species
- Restrict the spread of 20 species and prevent them colonising new parts of GB.

Overall, this would constitute a 50–67% reduction in the number of establishments of new invasive species, remove 5% of the established species and restrict the spread of a further 10%—these last species being the priorities for long-term control.[56]

[55] http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environmental-audit-committee/invasive-species/written/104755.pdf
[56] https://www.wcl.org.uk/docs/Wildlife_and_Countryside_Link_CSR_submission_2020.pdf

In monetary terms, over the next 20 years this would amount to an approximate saving of £2.7 billion for an annual investment of just £6 million. That equates to a return on investment of £23 for every £1 spent. This estimate does not account for the restriction of the spread of 20 established species, nor does it take account of the cumulative cost of INNS as they become more established, so the actual saving is likely to be much greater.

viii. A one-off fund of £4.5m for a National Nature Service pilot to secure long-term job creation in the nature sector

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
National Nature Service	0.0015	0	0.0045	For levelling up. Increasing evidence of the benefits of macroeconomic intervention to encourage investment in nature. No formal vehicle to drive this forward through a fund for jobs	£4.5m could be taken from a number of funds including the Levelling Up Fund, or a new Green Jobs Taskforce OR £4.5 million cost would constitute just 2.25% of the Government's budget for the Kickstarter scheme, which is also designed to boost employment for the young and is expected to be underspent.

Costings and why we need it:

The Government should set up a National Nature Service pilot, as recommended by the Environmental Audit Committee. Such a pilot would advance the levelling up agenda by delivering the training and skills required to unlock new careers in nature for people in areas of high unemployment.[1]

This training delivery would combine the expertise of the environmental NGO sector and the financial capacity of Government to unlock a wave of nature recovery jobs, concentrated in areas of deprivation. This new training body would provide young people in rural areas with a new career path, providing the skills needed to access new nature (and in many cases climate) jobs, as well as wider transferable skills.

The £4.5m needed for the pilot could be taken from a number of existing funds including the Levelling Up Fund and the Kickstarter scheme budget (which is understood to be significantly underspent). We believe similar pilots could also be developed in the devolved countries.

ix. £500k p.a. for an Animal Sentience Committee to oversee the delivery of the Animal Welfare Action Plan and subsequent Animal Sentience Bill in England

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
Animal Sentience Committee	0.0005	0	0.0005	This committee will oversee the implementation of the Animal Sentience Bill	The Committee will be established by the Animal Sentience Bill and will prepare reports, across the full range of Government activity, on the impact that policies will have on the welfare of animals as sentient beings.

Costings:

The Committee is likely to consist of 10 to 15 members, needing support from a small staff team. The former Farm Animal Welfare Committee operated on this basis and required £300,000 per year in funding in 2013[57]. Link would suggest that, with allowance for inflation and the wider scope of the ASC, £500,000 p.a. would be an appropriate figure for ASC membership and administrative support.

Why we need it:

The Animal Sentience Committee (ASC) is the Government's chosen means to ensure that animal welfare *'is at the very heart of central government decision making going forward'*. The Committee will be established by the Animal Sentience Bill and will prepare reports, across the full range of Government activity, on the impact that policies will have on the welfare of animals as sentient beings.

At Lords Committee stage on 20.07.21 Defra Minister Lord Benyon confirmed that the ASC:

''Will have a dedicated secretariat to support its work. We want to ensure that the committee is appropriately resourced with sufficient membership and administrative support to make an impact and scrutinise the most important decisions but is not so large as to become unmanageable or overbearing.''[58]

This commitment is welcome. Membership and administrative resources will enable the ASC to inform Government decision making, supporting the Committee to provide Ministers with in-depth reports on the animal welfare impacts of different policies.

The commitment must now be delivered through an allocation for the ASC in the SR. The committee will start operating as soon as the Animal Sentience Bill receives Royal Assent. This is expected to be

[57] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/317786/FAWC_Annual_Review_2012-2013.pdf

[58] https://hansard.parliament.uk/Lords/2021-07-20/debates/98AD89E5-DFBD-46DF-B48A-743480D7B5EB/AnimalWelfare(Sentience)Bill(HL)

within 2021, meaning that support is required from the first year of the Comprehensive Spending Review period.

x. An additional £75k p.a. to support the National Wildlife Crime Unit to carry out its duties in tackling wildlife crime in England

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
National Wildlife Crime Unit	0.00045	0.0003	0.00075	The NWCU's work with Border Force has an important public health angle. The NWCU has an essential role to play in combatting this risk, both in preventing smuggled wildlife from entering the UK and working with partner agencies around the world to tackle the trade at source.	Since 2016, Defra and the Home Office have committed £300,000 a year to fund the unit. This funding is confirmed on an annual basis only, and currently runs only to the end of the 21/22 financial year. is sharply out of alignment with the key role the NWCU is now expected to play across a number of Government priorities. The unit is being asked to do a lot more than it did it five years ago, on the same amount of funding.

Costings:

The SR must recognise that the more financially secure the NWCU is, the more it will be able to deliver on Government animal welfare and public health priorities. Link recommends a guarantee of long-term, multi-year funding for the unit and an immediate increase in funding, to £450,000 a year, to reflect its new responsibilities. This secure funding base will enable the NWCU to increase its impact and further reduce wildlife crime.

Why we need it:

The National Wildlife Crime Unit (NWCU) plays a central role in efforts to tackle wildlife crime, supporting police forces across the UK dealing with domestic wildlife crimes and working with Border Force to prevent the illegal trade of wildlife across our borders.

Since 2016, Defra and the Home Office have committed £300,000 a year to fund the unit. This funding is confirmed on an annual basis only, and currently runs only to the end of the 21/22 financial year. This hand-to-mouth funding arrangement is sharply out of alignment with the key role the NWCU is now expected to play across a number of Government priorities. The unit is being asked to do a lot more than it did it five years ago, on the same amount of funding.

The NWCU will coordinate the Animal Welfare Action Plan commitment to tackle wildlife crime, as well as the specific priority, identified within the plan, of cracking down on the illegal practice of hare coursing. Raptor persecution and crimes against badgers are also on the rise, and require further action led by the unit.

The NWCU's work with Border Force has an important public health angle, now needed more than ever. Following Covid-19, the risk posed by pathogens derived from wildlife is now clear, as it is the role that the illegal wildlife trade plays in spreading these pathogens between animal and human populations. The NWCU has an essential role to play in combatting this risk, both in preventing smuggled wildlife from entering the UK and working with partner agencies around the world to tackle the trade at source.

xi. £50k p.a. to support the International Whaling Commission in order to place the UK as a driving force for animal welfare globally

Body	bn/yr needed England	Govt spend bn/yr	Remaining required bn/yr	Why it's needed	Notes
International Whaling Commission	0.00005	0	0.00005	To show international leadership in animal welfare standards	

Costings:

The UK has been a regular donor to the IWC's voluntary funds for its conservation and welfare work but its contribution to the IWC of £418,891 since 2010 compares poorly to its donation of over US$4,000,000 to CITES over the same period. We would like to see the UK make far more significant contribution to the vital work of the International Whaling Commission, through the provision of office accommodation.

Why we need it:

This is an opportune time to end this disparity between this standard hosting practice and limited UK support for the IWC. The IWC is facing significant financial challenges, arising in part from Covid-19, and has been forced to run a budget deficit. The IWC's long-term headquarters, the Red House in Cambridge, has recently been put up for sale, meaning that the UK has a timely opportunity to provide, or pay for, alternative office, meeting and storage facilities, through an allocation in the SR. Based on current commercial rents for offices in Cambridge that meet the IWC's needs (approximately 2,000 square feet), this is likely to cost in the region of £50,000 per annum. The UK government supports the location costs of other MEAs that it hosts, including the International Maritime Organisation (IMO). The IMO, whose premises are owned by the UK government, is currently the default meeting venue for the IWC's Biennial Commission meetings if no contracting government offers to host. We would like to see the UK offer this, or another appropriate venue, free of charge to the IWC for all its meetings.

Through the provision of a comparatively moderate sum, the SR could ensure the UK honours MEA hosting protocols – and helps to secure the future of the IWC, and the threatened marine mammals it protects.

5 Greening finance of wider Government spending decisions

In addition to dedicated investment to achieve environmental improvement and restoration, achieving a nature positive economy requires a transformation in government decision making.

Achieving a nature positive economy, not only requires new resources to restore what has been lost, it requires stemming the drivers of biodiversity loss and UK governments' own spending decisions are crucial given that government expenditure represents 41% of UK GDP. The Government has taken steps to ensure financial regulators take climate change and the environment into consideration in exercising their statutory functions, and also committed to ensuring future UK bilateral aid spending does no harm to nature. This is a good start but, as emphasised by the NAO (2020), '*Environmental impacts are still not being taken into account in spending decisions. For the last Spending Review, the HMT asked departments to set out how their proposals would contribute towards the UK's statutory carbon targets, and to explain their impact on, and coherence with, the 25 Year Plan. However, departments struggled to do this.*'

The EAC (2020) has also emphasised that *'The nature recovery network that the Government has promised must not be an afterthought established after other infrastructure is built. Nature recovery must be integral to the Government's infrastructure plans and factored in from the start as a strategic priority'.*

The PfG (2021), commits the UK Government *'to fully implement a 'Green Taxonomy' to provide a common standard for measuring firms' environmental impact and will require firms to disclose the climate risks they face in line with the recommendations of the Taskforce on Climate-Related Financial Disclosures (TCFD)'.*

Disclosure of climate risks is positive, but it gives only a partial picture of environmental impacts. Climate and nature are interdependent and should be treated with the same transparency and urgency. With this in mind, the Government should extend disclosure to wider environmental impacts, through the TFND but also apply the same ambitions to its own infrastructure and recurrent spending.

There are four areas to improve to achieve the systemic transformation needed in decision making for government to achieve its nature positive goals.

5.1 Green Book reform and effective implementation

As part of updating its Green Book guidance on evaluating projects, the HMT has made changes to better prioritise the environment, and it has commissioned furthxer work to understand the economic implications, and amend guidance, on environmental impacts, notably biodiversity. However, further changes are required to ensure that Green Book guidance contributes to delivery of environmental objectives and that it is properly implemented across the public sector. We recommend:

- In line with the recommendations of the Natural Capital Committee (2020), all publicly funded infrastructure projects and programmes, infrastructure providers and public bodies must be required to invest in maintaining and enhancing natural capital. All such projects, however initiated, must have a net biodiversity gain requirement placed upon them. Such projects must take full account of natural capital impacts by including it in the project appraisal process as per the Green Book guidelines.
- As well as changing the content of the Green Book, the Government must ensure that changes are properly implemented across the public sector. The Government should integrate training

on the Green Book with the new Civil Service core curriculum, make Green Book understanding key learning for ministerial training and ensure all appraisers across government are fully competent with actually putting green book environmental guidance into practise.

- Since its inception in 2009, the Regulatory Policy Committee (RPC) has never had any environmental experts informing its judgements. This influential Committee currently lack the competence to adjudicate on environmental issues despite environmental impacts being key to many impact assessments it passes judgement on. The Government should appoint an independent environmental expert to this Committee. In line with the NCC recommendations[59] we also call on government to ensure the OEP works in collaboration with the RPC to further ensure Green Book environmental guidance is fully considered in policy impact assessments. From SR 2021 onwards, the RPC must 'Red Flag' impact assessments that result in significant impacts on nature or losses of natural capital.

5.2 Environmental screening for Government Spending Reviews

A crucial recommendation, made by the PAC[60] (2020) in assessing the government's ability to achieve its long-term environmental goals was: '*Alongside the next Comprehensive Spending Review, the HMT should publish analysis showing: how the full value of environmental impacts has been taken into account, and the impact of spending decisions on meeting government's long-term environmental goals.'*

Whilst the Government is championing disclosure rules for the private sector, ensuring its own spending plans 'do no harm' is just as important given the size of its own economic footprint. The government first introduced fiscal rules in 1997, designed to constrain tax and spending behaviour by setting rules by which they promised to abide. In 2010 the government established the Office of Budget Responsibility (OBR) as an independent fiscal arbiter to assess and pass judgement on the government's fiscal performance. It is increasingly possible to assess the environmental impacts of spend and include these assessments within a broadened Fiscal Framework61, designed not only to achieve financial sustainability but net zero and nature positive goals.

New appraisal methodologies and governance processes are needed to ensure that public spending is nature-positive. The OECD's Paris Collaborative on Green Budgeting promotes the use of 'green budgeting' tools such as 'budget tagging', to help countries to provide policy makers with a clearer understanding of the environmental and climate impacts of budgeting choices, while bringing evidence together in a systematic and co-ordinated manner for more informed decision making to fulfil national and international commitments. We commend the UK on joining this initiative.

Many other governments have already started to adopt/use green budgeting tools. In 2021, France published its first Green Budget in which it used 'budget tagging' to identify both the positive and negative impact of measures on the environment and use this information to refine/adjust fiscal policies. More than a third of OECD countries (14, including Ireland and Wales) practice some form of

59 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/933803/ncc-final-response-25yr-env-plan.pdf

60 https://publications.parliament.uk/pa/cm5801/cmselect/cmpubacc/927/92702.htm

61 https://ifs.org.uk/research/104

green budgeting, with many others indicating plans to introduce green budgeting in the future. In line with PAC recommendations, the UK should follow suit.

WWF , with support and analysis from Vivid Economics, has already developed and piloted a budget screening tool, as a basis on which the HMT can build. WWF's 'net zero test' tool builds on established budget tagging approaches promoted by the OECD, to enable analysis of the impact of spending and tax decisions on a range of environmental metrics, i.e. climate change mitigation (carbon emissions) and adaptation, water management, circular economy, air quality, and biodiversity.

Other initiatives in train to measure and monitor the broad environmental consequences of public spending include the evolving Nature Transition Index and the E3ME model. Developing a systematic approach to environmental screening of future public spending decisions should be a key part of the Government's green taxonomy work.

Recommendations are:

- The UK HMT should apply a net zero test to all spending/tax decisions in the 2021 CSR and Autumn Budget, based on a systematic assessment of the impacts of spending and tax policies on climate/nature goals.
- Publish the results of the net zero test analysis alongside the 2021 CSR / budget, showing how the information was used to inform budget decisions, in line with PAC recommendations.
- Set out the UK government's plans to fully integrate green budgeting tools/approaches into the UK fiscal framework
- Strengthen guidance to departments on the information they need to supply with spending bids (on climate/nature impacts)
- Build capacity across the HMT and wider government on green budgeting.

In terms of responsibility for scrutinising government spending plans/budgets (and major strategies, such as the Plan for Growth and National Infrastructure Strategy) against environmental objectives, we believe the government has several options, including: assigning this to the Office for Budgetary Responsibility supported by investment in new capacity/skills, or to the Office for Environmental Protection. Alternatively it could establish a new independent Office for Environmental Responsibility to perform this function alongside existing bodies.

c) New green procurement rules.

Buying 'greener' products and services is one of the UK Government's Greening Government Commitments[62]. However the latest annual report for 2019 presents a very mixed picture of performance across government. HMT is currently one of four government departments that currently have no sustainable procurement polices whatsoever.

In its National Infrastructure Strategy (2020) the government noted that exiting the EU provides the opportunity to reform public procurement. One of the most effective means the government has of driving the transformational change it seeks must be to use its own purchasing power to promote

[62] https://www.gov.uk/government/publications/greening-government-commitments-2016-to-2020/greening-government-commitments-2016-to-2020#buying-greener-products-and-services

environmental policies and leverage change in their suppliers' operations and practices. The UK Government spends around £290 billion annually on procuring goods and services.

The EU-UK Trade and Co-operation Agreement[63] agreed between UK and EU in 2020 allows for procuring entities to take into account environmental, labour and social considerations throughout a procurement procedure. The government's latest Green Paper on public procurement[64] (2020) is currently focussed 'comprehensively on streamlining and simplifying 'the complex framework of regulations that currently govern public procure'. There is little recognition of the need to use resources from nature more sustainably and efficiently as enshrined in the Environment Bill. The logic for adopting green public procurement protocols (GPP) has been explained by the OECD:[65]

- GPP can be a major driver for innovation, providing industry with incentives to develop environmentally friendly works, products and services.
- GPP may also provide financial savings for public authorities, especially when considering the full life-cycle costs of a contract and not just the purchase price.
- Authorities who implement GPP will be better equipped to meet evolving environmental challenges, for example to reduce greenhouse gas emissions or move towards a more circular economy.

It is untenable for the UK Government to introduce new green taxonomies and due diligence requirements on the private sector which it does not fully apply to its own procurement and spending. The current reform of procurement is the opportune moment for the UK Government to demonstrate global leadership and adopt world leading green public procurement (GPP) rules. The UK Government must use the post Brexit opportunity to reform its approach to public procurement to make it green and fully consistent with its own environmental goals, law and guidance.

As part of the Spending Review, the Government should commit to achieving nature positive public procurement by 2030 and publish a plan for how this will be achieved.

5.3 Disclosure rules for business and nature

The UK Government has championed the Taskforce on nature related financial disclosures (TFND[66]) and HMT already has a green taxonomy[67] process in train. It is also working to ensure the remits of both the Monetary Policy Committee and the Financial Policy Committee reflect the UK Government's economic strategy for delivering an environmentally sustainable, net zero economy.

63 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/948119/EU-UK_Trade_and_Cooperation_Agreement_24.12.2020.pdf

64 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/943946/Transforming_public_procurement.pdf

65 https://www.oecd.org/gov/public-procurement/green/

66 https://tnfd.info/

67 https://www.gov.uk/government/news/new-independent-group-to-help-tackle-greenwashing

The government intends the UK to become the first G20 country to make TCFD-aligned disclosures mandatory across the economy and has a provisional timetable in place.

If the government is to act with the urgency needed to address the nature crisis, it must now commit to fully integrating nature-related financial considerations (impacts and dependencies) into the risk architecture, financial decision making and reporting of businesses and banks. The task of the TFND is inherently more complex than the job of the TCFD and we recommend the following four factors to ensure rapid progress and eventual success:

- The SR must commit sufficient financial resources to ensure the TNFD succeeds. Given the complexity of nature and the need to upskill the financial sector with the knowledge to make informed decisions the Government has a central role to play.
- Work closely with the scientific community to integrate existing environmental data and understanding of nature related metrics, into business and financial risk modelling and accounting.
- Maintain the 'double materiality' principle so that disclosure considers both how nature change impacts on a company and its operations, and also on how the operations of a company impact nature.
- As with the TFCD, have the ambition to be world leaders and set out a roadmap and explicit timetable towards mandatory nature-related financial disclosures.

5.4 Recalibrating Economic prosperity – National Natural Capital Accounts development to sit alongside GDP

The government fully supported the recommendations of the Bean review[68] and, to date, has provided the ONS with an additional £25m to help improve UK economic statistics – including through an initiative called "Beyond GDP" that aims to address the limitations in GDP by developing broader measures of welfare and activity. Natural capital accounting must be core to this transformation of redefining progress. A full set of national accounts for the extent and condition of natural assets is needed which will enable the state of these assets, as well as the values derived from them, to be recorded and reported on a more detailed level, which is relevant for decision making and policy development. These so called 'bottom up' accounts would be aided by having a natural capital baseline assessment and should enable further refinement of the 'wealth accounts'. The NCC[69] advised that the next iteration of the ONS national accounts should include a national balance sheet of the value of natural assets, estimates of the depreciation of those assets (where this occurs) and a redefinition of the way in which income and savings are measured in national accounts. **We call on the Government to commit to publishing national natural capital accounts at all future Spending Reviews so that changes in GDP outcomes can be understood in the context of the change in natural assets (wealth) resulting from income/consumption changes.**

[68] https://www.gov.uk/government/publications/independent-review-of-uk-economic-statistics-final-report

[69] https://www.gov.uk/government/publications/natural-capital-committees-end-of-term-report

6. Financing Green

As emphasised above, we believe increased public investment is vital to achieve a nature positive future. Nonetheless, increasing private investment can play a significant role in closing the current funding gap.

'Increased private sector investment into protecting and enhancing natural capital will also be crucial to improving our resilience. Further consideration should be given to how public-private investments in natural assets can enhance the ability of the natural environment to contribute to UK resilience. Accelerating Green Finance[70] – A report to Government by the Green Finance Taskforce (2017).

It is clear that government see existing and evolving public funding as having the potential to leverage private finance and that private finance is seen as key to achieving environmental targets and nature positive outcomes for the UK. Processes are in train with the Finance for nature[71] partnership leading engagement. As the Government say:

'*Private sector investment will be a vital complement to planned public sector investment, and so it is crucial that we create the right conditions to unlock that investment*' (PfG 2021).

As noted above, there are areas of nature protection involving pure public goods, like biodiversity, where Government funding is essential to securing outcomes. We recognise though that conserving nature can have private benefits, from carbon, water quality, flood mitigation, health and recreation, where private finance can potentially complement government supported action to deliver multiple benefits. It must be recognised that such 'blended' approaches are at a nascent stage of exploration and Government has a key facilitatory role. New income streams can be generated through new market-based approaches (such as the UK-ETS and BNG) but getting these market models right and ensuring consistency and coherence will be paramount. Government needs to take a strong and active role in creating the conditions to facilitate private investment and addressing the barriers which currently restrict opportunities for private finance in nature. Creating new blended finance approaches will require:

a) Coherence and consistency between government funding designed to underpin blended finance approaches.

The Government has established a £10 mill natural environment readiness fund[72] and the £640 million Nature for Climate Impact Fund both designed to leverage private finance into new natural capital markets for carbon, water quality, biodiversity, natural flood alleviation' (Budget 2020). This 'accelerator' type funding should help identify investment opportunities. It is crucial that government contributions to create new market opportunities provide genuine financial additionality and not simply provide private developers with the opportunity to 'stack' different public revenue streams. Avoiding this requires collaboration between all the different public funding streams designed to leverage private funding into nature.

70 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/703816/green-finance-taskforce-accelerating-green-finance-report.pdf

71 https://www.greenfinanceinstitute.co.uk/coalition-roadmap-financing-uk-nature-recovery/

72 https://www.gov.uk/government/news/innovative-nature-projects-awarded-funding-to-drive-private-investment

b) New market infrastructure, rules, regulation and standards will need to be established for private investment in nature positive outcomes.

This is also key to ensuring public support does leverage private support, thereby providing additional investment and ensuring rules guard against greenwashing or undermining the mitigation hierarchy[73] in terms of both achieving carbon and biodiversity objectives. Overcoming the barriers which currently restrict private sector investment will require government action and ongoing involvement to ensure markets are informed by the right data and information, that new market rules and contracts are appropriate and that policy frameworks and institutional architecture are effective. This will include, for example, creating new UK-wide carbon codes for habitats such as saltmarsh.

C) Sufficient government funding to establish new markets and ensure effective performance. It is very hard to estimate what public funding will be required for new markets to succeed but it is clear that new markets will involve new roles for an array of public bodies particularly nature agencies, regulators and local authorities. Establishing new mechanisms, like BNG, will involve significant foundational spend over the SR period and ongoing support in terms of the systems, advice and expertise needed to make them work. We have factored needs for BNG in our asks above but this should be seen as a minimum estimate if further market-based approaches are to be implemented.

Subject to the points above, we believe there is significant scope for growth in private sector investment for nature in the UK, given increasing interest in nature-based solutions to carbon and other challenges such as flooding. Main opportunities include:

- Biodiversity Net Gain – the government's impact assessment of BNG proposals estimated annual funding of £199 million per year for conservation in England;
- Carbon markets – markets are expected to grow in the push towards net zero, with increasing demand for and price of credits evident. An effective market depends on regulation and enabling measures. We recommend setting up a new Office for Carbon Removals. This would play a vital role in creating the regulatory and financial framework needed for a fully-fledged market that ensures the imperative for all sectors to reduce emissions is not undermined by new market opportunities to offset. Additionally we believe the development of carbon markets and the provision of future public support should support genuine nature-based solutions that deliver for nature and climate. We have particular concerns about the potential role envisaged for bioenergy and carbon capture (BECCS). As biomass is not carbon neutral[74], policymakers cannot assume BECCS is carbon negative, and new research[75] shows that if biogenic emissions are taken into account, BECCS can actually increase CO2 in the atmosphere over relevant timescales. Further, scientists[76] warn that the deployment of BECCS at scale could consume vast areas of land, posing significant land-use change risks, compromising habitat ambitions. Any programme to subsidise BECCS on a large scale could be ineffective in drawing down emissions, risk significant harm to nature, and divert public resources better invested elsewhere.

[73] https://www.thebiodiversityconsultancy.com/approaches/mitigation-hierarchy/
[74] https://www.pfpi.net/wp-content/uploads/2011/03/Searchinger-et-al-2009.pdf
[75] https://www.nrdc.org/resources/uncaptured-biogenic-emissions-beccs
[76] https://www.imperial.ac.uk/media/imperial-college/grantham-institute/public/publications/briefing-papers/BECCS-deployment---a-reality-check.pdf

- Natural flood management – the government has a £5.2 billion multi-year investment programme for flood protection in England alone, but nature-based solutions amount to only £200 million. There is significant scope for future growth[77];
- Water company investments – water companies are emerging as major private sector investors in nature-based solutions in England and Wales, and price regulation increasingly facilitates this.
- Voluntary nature positive investments – as the concept of nature positive is increasingly adopted by business, there will be increasing interest in nature investments as voluntary offsets for negative impacts and to achieve new procurement/disclosure expectations.

The potential scale of these markets is difficult to predict, but some illustrative projections are presented in Table 6, suggesting a possible market size of £615 million annually in England and £760 million in UK by 2030.

Table 6: Possible scale of future private sector markets, 2030, illustrative

Market area	Possible scale of funding (£m pa)		Notes
	England	UK	
Biodiversity net gain	199	230	England figure is central estimate from Defra impact assessment. UK figure is scaled up by GDP, if similar requirements across UK
Carbon markets	46	87	Green Alliance estimate of natural carbon market in UK by 2030; England figure proportionate to land area.
Natural flood management	250	300	England figure assumes annual investment in flood management continues at £1 billion, and that share of nature-based solutions increases to 25%; UK figure scaled by population
Water company investments	80	96	Assumes doubling of current estimated biodiversity investment
Voluntary nature positive investments	40	50	Illustrative – no evidence available
Total	615	763	

Private investment could therefore help to close the funding gap, but additional public investment (public money for public goods) is also critical, particularly to meet targets for biodiversity and other public goods to be set through the Environment Bill. As emphasised above, public expenditure will also be required to establish the right policy frameworks, institutional arrangements and oversight to ensure new opportunities for private funding succeed.

New debt financing possibilities to achieve nature positive

Green Bond Issuances

'Green gilt issuance in the financial year 2021-22 will be a minimum of £15 billion. These green gilts will help fund critical projects to tackle climate change and other environmental challenges' (PfG 2020)

We welcome the Government's announcement of news Sovereign Green Bonds and consider that it has significant potential to incentivise a green recovery. According to the government, the proceeds of

[77] SuDS have the potential for creating private investment in nature. This could be achieved through compulsory rules on use of SuDS in new developments

the issuance of the bond instrument will be utilised for eligible green projects, which are projects that contribute to the environmental objectives set out in the ICMA Green Bond Principles

The UK Taxonomy Objectives in relation to the protection and enhancement of terrestrial and marine biodiversity, ecosystems and natural capital include:

- Sustainable land use and protection, including environmentally sustainable agriculture
- Environmentally sustainable clean water, water, storage and wastewater management initiatives
- Funding for environmental activities of public sector arms-length bodies,

We welcome these objectives and, given the size of financing to be raised, see no further excuses for not fulling funding the needs of the UK's environmental agencies. This debt financing can both deliver the government's own direct investment in nature positive outcomes and help support new blended financing models to attract private sector finance.

UK Infrastructure Bank

In addition to a mandate to contribute to the delivery of net zero, the new Infrastructure Bank must be given a mandate to encourage the financing of projects which promote nature recovery. The Government notes it will review the case for broadening the mandate to include other areas such as improving the UK's natural capital, before bringing forward legislation to put the Bank on a statutory footing. However, the government must also review the failure of the former Green Investment Bank, when government owned, to ever lend for natural capital purposes despite that being one of its four key areas of focus.

1. Annex I - Table of costs

NATURE DELIVERY						
Issue	**bn/yr needed England**	**bn/yr needed UK**	**Govt spend bn/yr**	**Remaining required bn/yr**	**Why it's needed**	**Notes**
LAND						
Land management (including priority habitats, species, boundary features, historic env, arable, grassland, organic)	1.934	3.551	1.952	1.599	Additional funding needed for species recovery over next three years to hit the 2030 nature target & 30x30. Also need to meet 25YEP target 75% SSSIs favourable condition	Govt spend- what is accounted for: £473m govt spend JNCC 2018/19 + NGO biodiversity spend of £258m farming budget of 'environmental and animal welfare outcomes' aver p.a. budget of £1.093bn = £1.824bn Nature for Climate fund £128m p.a. TOTAL= £1.952bn*,** * (haven't accounted for devolved farming spend because most of this is likely to go on BPS and we don't have the breakdown of spend on environmental outcomes. if included, Government spend would be = £2.949bn **This figure does not include advice and training etc
Darwin fund		0.01	0.01	0	To continue the Darwin Initiative project in Overseas Territories	
subtotal terrestrial		3.561		1.599		
FRESHWATER						
Water Targets (WFD)	0.564	0.564	0	0.564	To meet water targets under Env Bill and fulfil 25YEP commitments. Investment would provide £726m in benefits per year + £5bn in savings until 2052	govt funding for floods & water = £524m in capital: see p. 27 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818433/defra-annual-report-2018-2019.pdf

Water (CaBa)	0.0048	n/a	0.0016	0.0032	Catchment-based partnerships deliver a whole range of benefits to the wider environment, but particularly freshwater ecosystems. Centrally the support has varied over the years but is generally between £200K and £300K. This is for the central Steering Group and Working groups that do stuff to support CaBA as a whole.	Currently partnerships get £15K for a whole catchment (or a portion for a sub catchment) and there are 105 altogether (some whole, some sub). In total Defra indeed spend ~£1.4m on hosting costs. Current: £15,000 x 93.5 = £1,402,500 plus central £200,000 = £1,602,500 Double: £30,000 x 93.5 = £2,805,000 plus central £400,000 = £3,205,000 Treble: £45,000 x 93.5 = £4,207,500 plus central £600,000 = £4,807,500
subtotal freshwater	0.5688			0.5672		
MARINE						
Marine- all MPAs to get to good environmental status	n/a	0.09	0.006	0.084	To meet 25YEP commitment to get MPAs to good environmental status	expenditure figure only accounts for the funding for the Marine Management Organisation from 2020/2021
Marine (seagrass + RemMeMare)	n/a	0.0165	0.005	0.0115	Restoring the UK's priority coastal habitats; Supporting and expanding the ReMeMaRe project	ReMeMare project ask= £8m Seagrass restoration of 12.5ha over three years= £8.5m p.a. NB EA project only runs until 2023- Current govt expenditure from EA project: https://www.gov.uk/government/news/new-25-million-project-launched-to-restore-fragile-marine-habitats
Marine subtotal		0.1065	0.011	0.0955		
TOTAL	3.0716	4.2263	1.9696	2.2617		

ACCESS TO NATURE						
Issue	**bn/yr needed England**	**bn/yr needed UK**	**Govt spend bn/yr**	**Remaining required bn/yr**	**Why it's needed**	**Notes**
Access to urban green space (NT)		1.83			A total of £5.5bn investment over three years would bring £200 billion in health and wellbeing benefits. Estimated 40,000 jobs in initial construction and over 6,000 created permanently for ongoing maintenance.	* TBC- Different costing estimates for urban green space- need consolidating * Central govt funding is hard to calculate as budget allocations are made by local authorities *Funds could come from Levelling Up Fund
TOTAL		1.83		1.83		

ADVICE, ENFORCEMENT AND CAPACITY-BUILDING					
Body	**bn/yr needed England**	**Govt spend bn/yr**	**Remaining required bn/yr**	**Why it's needed**	**Notes**
Environment Agency	0.1	0.04	0.06	Environment Agency's ability to monitor and enforce water quality regulations is severely limited by lack of funding. This poses major risks to the environment, as well as risks to the Government's statutory obligations. The recent finding of 0% of rivers meeting Good Status is a case in point, alongside widespread public concern about the Agency's ability to uphold water quality rules.	
Natural England	0.389	0.198	0.191	Increase Natural England's advisory capacity to deliver a large-scale expansion in advisory services in readiness for ELM. Increase NE's capacity so they are able to a) fulfil their statutory duties with regard to protected sites and b) drive nature's recovery according to the 25 Year Environment Plan, not just prevent further decline.	Natural England is unable to fulfil statutory duties such as monitoring of SSSIs. On top of investment in these existing statutory duties, public bodies will need new investment to support and deliver key elements of the 25 Year Environment Plan. Funding asks from: https://committees.parliament.uk/publications/3453/documents/32928/default/
Farming and land management advice, training etc	0.173	(0.392)*,**	0.173	To help preparedness for moving to new ELM system + delivery of targeted species and habitats work	*govt spend accounted for under first ask. Division of 'environment and animal welfare' budget not publicly available ** this is not accounted for in the total funding gap below. This is because funding for advice is a devolved issue,
NNS	0.0015	0	0.0015	For levelling up. Increasing evidence of the benefits of macroeconomic intervention to encourage investment in nature. No formal vehicle to drive this forward through a fund for jobs	£4.5m could be taken from a number of funds including the Levelling Up Fund, or a new Green Jobs Taskforce OR £4.5 million cost would constitute just 2.25% of the Government's budget for the Kickstarter scheme, which is also designed to boost employment for the young and is expected to be underspent.
Animal Sentience Committee	0.0005	0	0.0005		The Committee will be established by the Animal Sentience Bill and will prepare reports, across the full range of Government activity, on the impact that policies will have on the welfare of animals as sentient beings.

National Wildlife Crime Unit	0.00045	0.0003	0.00015	The NWCU's work with Border Force has an important public health angle, now needed more than ever. Following Covid-19, the risk posed by pathogens derived from wildlife is now clear, as it the role that the illegal wildlife trade plays in spreading these pathogens between animal and human populations. The NWCU has an essential role to play in combatting this risk, both in preventing smuggled wildlife from entering the UK and working with partner agencies around the world to tackle the trade at source.	Since 2016, Defra and the Home Office have committed £300,000 a year to fund the unit. This funding is confirmed on an annual basis only, and currently runs only to the end of the 21/22 financial year. This hand-to-mouth funding arrangement is sharply out of alignment with the key role the NWCU is now expected to play across a number of Government priorities. The unit is being asked to do a lot more than it did it five years ago, on the same amount of funding.
International Whaling Commission	0.00005	0	0.00005		
Invasive Non-Native Species Secretariat	0.006	0.0009	0.0051	Funding for presenting invasive species will save	Gov commits to the recommendation of the EAC (Oct 2019) report on INNS, tripling the invasive species biosecurity budget to £3m and providing a further £3 m to form a dedicated invasive species inspectorate
AONBs funding	0.0134	0.0067	0.0067		£75m for National Parks and AONBs was committed to in the 2020/2021 spending review, but unclear where/how/when it will be allocated AONBs are heavily underfunded. This also applies to National Parks, however we do not have accurate costings for National Parks- additional funds will be needed.
LNRSs	0.0213	0.001	0.0203	With the roll-out of Local Nature Recovery Strategies (LRNSs) planned for April 2022, sufficient resources must be made available to local authorities in the forthcoming Spending Review to ensure that they are successfully delivered.	£38m to set up (includes both direct (£20m) and indirect (£18m) costs. Then an annual £17m to run and review over a five year reporting period. Total is £96m.
Net Gain (local authority staffing)	0.043	n/a	0.043	Statutory commitment for local authorities to enforce BNG. Many local authorities lack the capacity and expertise to do this	
TOTAL	0.7482	0.2469	0.5013		

Wildlife and Countryside LINK

This representation is supported by the following Link members:

A Rocha
Bat Conservation Trust
Buglife
League Against Cruel Sports
Chartered Institute of Ecology and Environmental Management
Wildfowl and Wetlands Trust
People's Trust for Endangered Species
British Mountaineering Council
Wildlife and Gardening Forum
Open Spaces Society
Friends of the Earth
Marine Conservation Society
National Trust
Naturewatch
Butterfly Conservation
RSPCA
Rewilding Britain
RSPB
Plantlife
Woodland Trust
The Wildlife Trusts

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