

Wildlife and Countryside Link response to the Defra consultation on Sustainable Development Indicators

Wildlife and Countryside Link (Link) brings together 38 voluntary organisations concerned with the conservation and protection of wildlife, countryside and the marine environment. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together our members have the support of over eight million people in the UK and manage over 690,000 hectares of land.

Link has a strong interest in sustainable development, and in recent years we have campaigned around sustainable development in the land use planning system, the marine environment and as a principle of the Common Agricultural Policy.

This response is supported by the following 15 organisations:

- Amphibian and Reptile Conservation
- Bat Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Campaign for National Parks
- Campaign to Protect Rural England
- Friends of the Earth
- Mammal Society
- Open Spaces Society
- Plantlife
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- The Wildlife Trusts
- Waterwise
- Wildfowl and Wetlands Trust
- Woodland Trust

1. Introduction

The choice of sustainable development indicators depends on their desired purpose, i.e. on the common vision for sustainable development we are seeking to achieve. The UK Government currently lacks a common vision and strategy for sustainable development. In February 2011, Defra launched its approach to embedding sustainable development in Government thinking and policy-making, in *Mainstreaming Sustainable Development*. The document proposes a range of measures to embed sustainable development across its policies and operations, as well as key departmental initiatives and actions. But it fails to provide a vision of what a sustainable future would look like for the UK. As a

result, it is difficult to assess whether the indicator set is suitable for measuring progress on sustainable development.

Link believes that a sustainable development policy should include a broad understanding of biodiversity and land use, encompassing agriculture, forestry and water, as well as development decisions through the planning system. Link therefore supports the inclusion of these issues in the indicator set proposed. There are, however, a number of critical issues not included in the draft indicator set, and not all of the proposed indicators would – as currently drafted – provide meaningful data on our progress towards sustainable development. We have made suggestions to address these concerns in our comments on individual indicators below. We note that all supplementary indicators in the consultation document are labelled as 'green economy indicators'; these should be split in order to clearly show which indicators relate to the natural environment.

2. Headline indicators

2.1. Natural resource use (proposed indicator 5.2)

Link **strongly agrees** that natural resource use should be included in the overall indicator set.

Link also **strongly agrees** that natural resource use should be a headline indicator.

However, Link strongly disagrees with the proposed omission of data on aggregates usage for construction. It is critical that we use natural resources more efficiently, and quarrying has considerable environmental impacts (as well as potential benefits). A truly sustainable approach should seek to minimise and reduce overall use of aggregates.

2.2. Wildlife and biodiversity (proposed indicator 5.3)

Link **strongly agrees** that wildlife and biodiversity should be included in the indicator set.

Link also **strongly agrees** that wildlife and biodiversity should be a headline indicator.

Ideally, Link would like to see this headline indicator reflecting a more representative and wider range of species and habitats. One approach would be to follow the approach of the UK Biodiversity Indicators set based on birds, insects, plants and mammals, and present a series of separate indicator graphs. The disadvantage of this approach is that the information is not currently combined into a single index or graphic and measured as such within the Sustainable Development Indicator set.

In the immediate future we therefore agree with the use of the bird population indices as a single index, since it is the most developed of the wildlife indices currently available. However, there must be a commitment to develop the headline wildlife indicator into one which is more broadly representative of the UK's biodiversity. This task could be undertaken by the UK Biodiversity Indicators Steering Group, and we note the on-going work of the Species Indicator Initiative to develop multi-taxon wildlife indicators.

2.3. Water availability (proposed indicator 5.4)

Link **strongly agrees** that water availability should be included in the indicator set.

Link also **strongly agrees** that water availability should be a headline indicator.

Link believes that water availability captures the 'capital', and we understand why it has been chosen as an end outcome measure of water consumption. However, there are a number of issues which need to be factored into the interpretation of the data in order to provide a sufficiently nuanced view of whether we are developing sustainably. We have suggested two ways in which this indicator can be improved.

Firstly, the status of the 'water availability' indicator as proposed is not only linked to levels of water consumption, but can be variable from year to year due to other socio-environmental factors. The consultation proposes that this indicator would be linked to a water map, but the map does not take this variability into account. In addition, the variability, which is not necessarily related entirely to abstraction, could result in uncertain or misleading interpretation of the indicator data, and thus inappropriate or inadequate policy responses. Water available for abstraction (rather than total water available), would provide a better indicator, but it would be more difficult to determine and would not solve the problem of annual variation. We therefore recommend using the deterioration in consumption/abstraction as a basis for this indicator, which would effectively highlight unsustainable development by clarifying the links between cause and effect and therefore whether changes in the indicator are cause for genuine concern. We understand that this moves slightly away from the idea of measuring 'stock' and 'capital', but in this case we believe it would give a better indication of sustainable development.

Secondly, it is stated that this indicator would be used to determine where, and during what months, new abstraction licenses can be given. We are already over-abtracting in many instances (e.g. the Upper Lee and the Kennet) and this pressure needs to be adequately addressed before we can be said to be developing sustainably. Showing whether additional abstraction should be halted is not therefore sufficient. Instead, this indicator needs to show whether overall levels of abstraction need to be reduced, by understanding the volume of water which can be abstracted from each water body without causing 'serious damage'.¹ Even if new abstraction is only considered when water availability is believed to be high, there is a limit and this should be calculated before abstraction licenses are issued. This figure for permissible abstraction also needs to incorporate a contingency buffer during dry years, so that abstraction is not only sustainable in wet years.

Finally, it is essential to develop an accurate baseline for sustainable development around water issues, since we know that current water usage is unsustainable. Clearly, current water availability levels are not on a sustainable trajectory, but neither can we use a historical figure since changes in the climate would render this inaccurate. We suggest that an appropriate absolute baseline of water availability would be zero abstraction, represented by current water availability plus total water abstracted.

2.4. Additional headline indicators

¹ For more information, please see the Link response to the consultation on the principles to be used in determining whether a water abstraction may cause serious damage:
http://www.wcl.org.uk/docs/Abstraction_compensation_section_27_consultation_BP_response_final.pdf.

Link believes that, in addition to the proposed indicators, there should also be a headline indicator on High Nature Value (HNV) farming. This indicator would make an important contribution to our understanding of whether we are developing sustainably, and also fill the gap left by the absence of an indicator on the environmental sustainability of agricultural practices.

Member States are required to assess the 2007-2013 Rural Development Programmes (RDPs) using two indicators of the impacts on biodiversity: the Farmland Birds Indicator; and the HNV Impact Indicator. While the Farmland Birds indicator has been in existence for some time, the monitoring framework for HNV farming and forestry has lagged behind. However, given the importance of HNV systems for many priority species and habitats, it is essential to have indicators of both the extent and condition of HNV farming and forestry. This should include the development of indicators to, a) identify HNV farming and forestry, providing quantitative assessments of their extent (including representative ground-truthing of the accuracy and sensitivity of the indicators), and b) monitor changes in the condition of HNV farming and forestry (that is, qualitative changes through sample surveys of biodiversity and farming practices). The HNV indicators can be used to monitor the effectiveness of RDPs and also to enable support measures to be targeted at HNV systems.

3. Supplementary indicators

3.1. Land use and development (proposed indicator 8.5)

Link **strongly agrees** that land use and development should be included in the indicator set.

Link **agrees** that land use and development should be a supplementary indicator.

However, Link does not think that the indicator as proposed is at all suitable to capture the issue. Using the overall percentage area covered by agriculture, woodland, water or urban is not sufficient to determine whether overall land use, and agriculture and development permitted through the planning system in particular, is becoming more sustainable.

In relation to agriculture, we must continue to be able to measure whether agricultural land is being safeguarded², or under management that allows it to achieve a range of environmental benefits, especially in the context of the twin pressures of climate change and global population growth. Also, the consultation paper states that 'development of this indicator needs to take account of the National Planning Policy Framework' (NPPF). However, there has to date been no development of indicators to measure the effectiveness of the NPPF.

Link therefore recommends that the existing indicators on 'land recycling' and 'dwelling density' (25 and 26) should be retained, or at the very least the proportion of new dwellings on previously agricultural

² Since 1995, considerable progress has been made to ensure a continued steady supply of new housing whilst at the same time slowing the rate of growth in conversion of undeveloped (agricultural or forestry) land to developed uses, points recognised in a 2010 Defra report (Defra Soil Research Programme (2010) *Review of the weight that should be given to the protection of best and most versatile (BMV) land*, Technical Report SP1501/TR, pp.12 – 13.

land should continue to be measured. The Department for Communities and Local Government (DCLG) has recently announced that it will continue to generate the datasets needed to measure these indicators, produced under the aegis of Land Use Change Statistics (LUCS). If the 'land recycling' indicator is retained, it should be designed to recognise that not all land currently defined as 'brownfield' is suitable for development, and that many brownfield sites have high environmental value. Link recommends that a supplementary indicator is devised to measure whether brownfield sites with high environmental value are being developed or are being managed effectively for wildlife interest.

3.2. Status of species and habitats (proposed indicator 8.9)

Link **strongly agrees** that the status of priority species and habitats should be included in the indicator set.

Link **agrees** that status of priority species and habitats should be a supplementary indicator.

3.3. River water quality (proposed indicator 8.7)

Link **strongly agrees** that river water quality should be included in the indicator set.

Link **agrees** that river water quality should be a supplementary indicator.

Link agrees that this indicator should be measured using the percentage of waterbodies that achieve Good Ecological Status under the Water Framework Directive, as suggested in the consultation paper. However, it would also be useful to have an expression of river water quality via biological elements, i.e. fish, invertebrates and macrophytes. It may therefore be useful to include the Environment Agency Reason for Failure data in this indicator. This data lists the reasons that waterbodies are failing, and would help to show failings in sustainability of the practices causing the pollution, e.g. sewage discharge and agricultural pollution.

3.4. Additional supplementary indicators

Link also recommends an additional supplementary indicator on water efficiency. Without water efficiency measures, water usage will continue to increase as a result of an increasing population, urbanisation and changing climatic conditions, and rates of water abstraction/usage will become unsustainable without a corresponding increase in water efficiency measures.

Finally, Link recommends that an additional supplementary indicator that demonstrated the quality of place for living and working would be useful, and could be introduced using data on landscape and protected site quality that Natural England already collects.

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