

## Defra discussion document on the Nature Recovery Network

Response by Wildlife and Countryside Link

July 2019

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

*This response is supported by the following Link members:*

- *Amphibian and Reptile Conservation*
- *Association of Local Environmental Records Centres*
- *Bat Conservation Trust*
- *British Ecological Society*
- *Buglife*
- *Butterfly Conservation*
- *Campaign for National Parks*
- *Campaign to Protect Rural England*
- *Friends of the Earth England*
- *Institute of Fisheries Management*
- *National Trust*
- *Open Spaces Society*
- *Plantlife*
- *RSPB*
- *The Wildlife Trusts*
- *Whales and Dolphin Conservation*
- *Wildfowl and Wetlands Trust*
- *Wildlife Gardening Forum*
- *WWF-UK*

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### Introduction

This short paper summarises Link's thinking in relation to the Discussion Paper. Some of Link's members have deep expertise relating to key elements of the Nature Recovery Network ("NRN") and will provide their own more detailed responses to the discussion paper.

Link agrees with and supports much of the Defra Group Discussion Paper and we welcome the collaborative approach that Natural England and Defra are taking to develop this initiative. We support the proposals for building a network in partnership (Section 10 and 11).

We agree that a NRN would underpin the post-2020 Nature Strategy, helping to address the climate and ecological crisis by informing and integrating decision-making, including through tools such as Biodiversity Net Gain and Environmental Land Management.

We appreciate the explanation of how the NRN relates to other Government strategies (Sections 2 to 4). However, there is still a lack of clarity and some inconsistency with later sections, which needs to be resolved. For example, we would welcome clarification on the relationship between the NRN and 'Local Nature Recovery Plans'.

A clear, unambiguous definition of the NRN, and how it links with other 25 Year Environment Plan initiatives, is needed so that all can easily understand it.

Link believes that the primary aim of the NRN should be to recover nature, enabling it to become resilient and thrive, and to reconnect people with it. This should be set out as an overarching principle (Section 6).

NRN should incorporate existing schemes and designations, thus minimising the amount of work involved, and ensuring maximum buy-in from a range of stakeholders.

### **An appropriate legal framework**

It is vital to repair and restore natural systems, both for biodiversity and for the practical value nature provides to society. This must be addressed strategically at land and at sea. The NRN should provide the key organising spatial framework for nature's recovery which in turn underpins and enables successful delivery of the environmental commitments of the 25 Year Environment Plan.

In England, we look to the forthcoming Westminster Environment Bill as the legal mechanism that would establish the holistic, long-term systematic approach needed to bring this about across the whole country. However, as nature transcends borders, and with similar initiatives anticipated in other countries of the UK, it is vital that the UK Government also engages with its devolved counterparts to agree shared objectives for a coherent UK wide network, in which nature can recover and thrive.

The Westminster Environment Bill should be used to give the NRN a legal footing, by establishing duties on:

- The Secretary of State to provide national strategic guidance for the creation and implementation of nature recovery maps and plans throughout England.
- All public bodies to incorporate the NRN into all terrestrial spatial plans (for example local development plans, river basin management plans, flood risk management plans etc.), and to contribute to the delivery and maintenance of the NRN.
- Appropriate nominated public authorities to bring together relevant stakeholders including local communities to create and maintain the maps and to prepare and deliver plans to achieve the network.
- Relevant public authorities (including local or combined authorities and those responsible for delivering the new Environmental Land Management system) to ensure that policies relating to and decisions about land use, land management, infrastructure and other planning and development explicitly take account of these Nature Recovery Maps and Plans.

### **Criteria for achieving a Nature Recovery Network**

The NRN should be based on:

1. An understanding of the distribution and function of existing and potential areas of ecological and conservation importance within the landscape, which is most easily communicated through a spatial plan.
2. Where possible, situating new space for nature near to where it can deliver greatest access for large populations of people.

3. Partnerships of willing stakeholders who can design and deliver change at a landscape or catchment scale that should include local and combined authorities, major developers, farmers and landowners, nature conservation organisations, existing Local Nature and Enterprise Partnerships.
4. Assessments of where ecosystem service benefits can be delivered, and where they are needed, including where large concentrations of people live today and might be in the future. The NRN will inform where major development can take place in a sustainable way, without harm to the environment, and in a way that protects and restores nature, and contributes to nature's recovery. It enables the mitigation hierarchy to be addressed at a strategic level by showing where to avoid development as well as those areas where well-designed development can actually contribute to ecological connectivity and deliver net gain.
5. Delivery Plans – that target activity for effective and coordinated action to achieve a coherent and resilient ecological network that enables nature's recovery.
6. Designed and delivered at a landscape scale – in order to restore dynamic processes (such as the interactions between different habitat types); to give biodiversity the space it needs to recover, and to assess the relative cost-benefit of delivering for nature and ecosystems in different places. Landscape-scale design could involve working across local and combined authority boundaries. Appropriate authorities, for example Natural England, may need to bring the right stakeholders together to lead this landscape scale thinking.

### **Nature first**

Delivering multiple environmental benefits through the NRN is a desirable aim and in many places it should be able to deliver for nature, ecosystem services and people simultaneously. However, where there are conflicting options, protecting and restoring nature should take precedence over societal or economic outcomes.

### **Right habitats in the right place**

The NRN has to ensure that the right habitats are in the right places, taking account of a variety of factors including the ecological needs of species and integration with the wider landscape, whilst being responsive and dynamic enough to adapt to future changes in climate and other conditions. Without a complete and effective NRN, which effectively integrates all environmental decision-making, existing protected sites will not flourish, the populations of many species will fail to recover and become sustainable, and efforts to sustain populations of pollinators will not ultimately succeed. This would also be detrimental to our own health, well-being, and the economy.

### **An NRN that works for people**

In addition to protecting, enhancing and connecting sites of recognised value and their features (including species and habitats for which they are important, enabling nature to recover and thrive) restoring damaged habitats and creating new places for nature, the NRN should also take into account where the greatest benefits will be delivered for people. By 2030, 90% of the UK population will live in urban areas and where possible, in addition to restoring nature, the NRN should maximise benefits to people by delivering large areas of nature near to where people live. Such an approach will also protect and sustain more wide-ranging environmental benefits such as pollination and flood risk management. This will ensure that development and resource exploitation can be sustainable,

strengthen resilience to, and help mitigate the effects of, climate change; and provide people with access to high quality natural greenspace and a “natural health service” wherever they live.

### **Funding NRNs**

The way the NRN is implemented and resourced will be crucial in facilitating its success. There are opportunities to integrate the NRN with other policy mechanisms, thereby maximising spending benefits. However, Government should provide central funding that ensures proper design and delivery of the NRN. Ongoing cuts to funding for nature conservation and the agencies tasked with it have been part of the cause of nature’s decline. Government needs to turn around these ongoing budget cuts.

Maximum opportunity should be taken to build on existing systems and processes in order to deliver the NRN in the most cost-effective way. For example, the development of Local NRNs in National Parks should build on the partnership arrangements that already exist for Management/Partnership Plans in these areas.

One contributor to funding the planning of NRN could be through the charges levied as part of local planning authorities’ administration of biodiversity and environmental net gain, e.g. via the local planning system, although this source of funding alone will not deliver the entire NRN.

The Environmental Land Management scheme will be an important funding mechanism for some NRN elements, but alone will not be sufficient, and will not necessarily extend beyond capital costs or be able to fund these parts of the NRN in perpetuity.

One of the primary benefits of creating a collaboratively mapped and planned NRN is its ability to align and integrate the delivery of different areas of public policy, across national and local government. This includes biodiversity and nature conservation, flood risk, drought and water quality management, climate change adaptation and carbon storage, farming and forestry support, the conservation of cultural landscapes, economic development and public health (where these are most closely related to the state of the natural world). The NRN maps and plans can be used to identify where spending that is already allocated to these policy areas could deliver multiple benefits and achieve better value for money.

Further, we need to see a solid Government commitment to a new dedicated biodiversity fund - akin to the EU LIFE fund, but above and beyond in terms of scale – which can contribute to funding for the NRN.

### **Developing the NRN; broad objectives; success measures**

We broadly agree with the approach to development, the broad objectives, and the outline success measures (Sections 5, 7 and 8) although we do have some comments on specific elements.

An England or UK NRN will need to be implemented as an interconnected suite of Local NRN Areas.

Each Local Network Area will require an accompanying map and delivery plan<sup>1</sup>, taking account of national and regional priorities, but driven by local needs and opportunities.<sup>2</sup> This will ensure that positive action can be delivered on the ground, achieving the greatest benefit within available resources. This local map and plan may need to be at the landscape scale and designed across local or combined authority boundaries.

A pro-actively mapped and planned NRN will be critical to its effective delivery and its integration with other areas of public policy across national and local government.

### **Adapting to new information and climate crisis**

Local NRN maps will rely upon systems to be put in place to ensure not only that these are adequately detailed initially, but that information will be updated as progress is made and new information becomes available. They will also need to be informed by modelling of predictable changes, particularly with regard to climate and what this means for the viability of particular species, assemblages and communities and the implications at a particular site, e.g. in relation to seasonal rainfall. The two-degree world that we are likely to be living in 25 years from now means that the NRN could be undermined if it does not take future climatic change into account.

The NRN maps and plans need to be flexible so that opportunities to create new links that help adapt to climate change are not missed through rigid adherence to maps that are based on a severely depleted baseline. For example if, through landowner collaboration, there is a great opportunity for significant habitat creation outside of the NRN this should be encouraged and would contribute to national targets for climate change adaptation.

### **Three component areas**

We broadly agree with proposals set out in Section 9, but we envisage, along with a Delivery Plan for each local NRN, three component areas:

- core nature sites;
- connectivity zones;
- recovery opportunity zones

### **Full England extent for NRN**

For nature to recover, the NRN needs to extend across every part of England, including rural and coastal areas, cities and towns. For this to happen, the systems and processes necessary to implement it must operate everywhere, not in only a few target areas. If one of the purposes of the

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<sup>1</sup> **Maps** represent current reality and/or future intention/ambition/need, visually and spatially. They say nothing about the details of action, investment, delivery, process, timing, etc.

**Delivery Plans** set out future intentions for investment, action, regulation, delivery, etc. and include specific targets, milestones, timescales, delivery mechanisms, budgets, etc. They provide the organisational framework through which action is managed and delivered, to make the content set out in the Maps a reality.

<sup>2</sup> For example, Local Planning Authorities influence mineral planning and brownfield development, a key and comparatively easy path for reducing harm and increasing opportunity. It is essential to include Open Mosaic Habitat On Previously Developed Land in any nature map

NRN is to target delivery of actions and investment for nature's recovery (which it should), then this should be consistent across the whole country.

### **Existing sites**

Every effort should be made to retain, restore sites, buffer and link sites of existing importance locally. SSSIs and candidate SSSIs - often represent a 'conservation ark' for species otherwise lost from an area or England.

SSSIs, Local Wildlife Sites, Important Plant Areas, Important Fungi Areas and Important Invertebrate Areas together define the remaining high value nature sites – this is the core (along with any extensive area of undesignated priority habitat or irreplaceable habitat) that needs to be retained, restored, buffered and linked. In this way, the NRN provides the step change we need to implement the Lawton principles, moving away from simply protecting nature, to enabling it to recover from the current crisis

### **Local Nature Recovery Networks**

Local NRN maps and delivery plans provide the tools to strategically plan activity to restore, buffer and link sites that are important for nature to create resilient and functional networks of places for nature that will halt nature's catastrophic decline and enable nature to recover. Local planning authorities should have a statutory obligation to incorporate the LNRN that covers their area into their local plans, and local planning policies should take account of this. However, LNRN will be delivered through mechanisms beyond planning, and should be used to target delivery in other strategic policy areas so that delivery across all the themes of the 25 Year Environment Plan can be better integrated: for example the new farming system.

### **Data and information management**

*A national framework*, which sets criteria and guidance for development of Local NRN (Section 12), will be essential to ensure consistency, scalability and coherence across the entire Network and should be seen as a prerequisite for NRNs. This is particularly important in relation to local information management, collection and use (and how national datasets, models and other tools are employed).

Properly curated data is essential. This needs to cover:

- known and adequate quality information about sites, species, and habitats and environmental variables
- current, planned and previous interventions at particular locations (e.g. in relation to net gain delivery obligations or NELMs agreements)
- the value of different ecosystem services

Data should be collected locally and shared nationally, conforming to national standards to ensure interoperability and accuracy.

### **Conclusion**

Link strongly supports the 25 Year Environment Plan commitment to create a scalable NRN, and we hope that this response, and the detailed comments from some of our member organisations on the discussion document, will contribute to ensuring that the NRN will be effective in leading to nature's

recovery. We look forward to working with Natural England, Defra and all other stakeholders to bring the vision of a NRN system fully and effectively to life.

**For questions or further information please contact:**

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