

Actions within first 100 days of a new Government to put England on track to meeting 2030 species targets

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This briefing is on behalf of nature coalition Wildlife and Countryside Link ([Link](#)).

Introduction

The UK Government is committed to ambitious international and domestic environmental targets. These are important pledges, with the potential to address the biodiversity and climate crises and create a greener and healthier environment for wildlife and people, on land and at sea.

The Environment Act 2021 brought into force legally-binding environmental targets in England, including the target to halt the decline of species abundance by 2030 and increase species populations by 10% by 2042 and the target to reduce the risk of species extinction to below its 2022 level by 2042.¹ The Environment Act also legislated for the Environmental Improvement Plan (EIP), intended as a programme of interim targets and policy interventions to serve as a delivery vehicle for meeting the Environment Act targets.

However, the Office for Environmental Protection's (OEP) analysis of the Environmental Improvement Plan in January 2024 found that the Government is not on track to achieve the species abundance targets, as well as nine other environmental targets.²

Implementation of these domestic environmental targets is also essential to meeting the UK's obligations under the Convention on Biological Diversity's (CBD) Global Biodiversity Framework 2030 mission to halt and reverse biodiversity loss³ and to meeting the UK's climate obligations under the UN Framework Convention of Climate Change's (UNFCCC) Paris Agreement.

¹ <https://www.legislation.gov.uk/ukpga/2021/30/section/3>

² <https://www.theoep.org.uk/report/government-remains-largely-track-meet-its-environmental-ambitions-finds-oep-annual-progress>

³ <https://www.cbd.int/gbf/vision>

There is only one Parliament left to achieve these vital nature 2030 targets. The new Government must take early and decisive action to put us back on track to meeting the statutory species targets, as promised in the 2024 Labour Party Manifesto.⁴

This briefing sets out the actions that the new Government can take within the first 100 days of office to achieve the trajectory needed to halt the decline of species by 2030. Those initial actions comprise:

- A thorough review of the Environmental Improvement Plan, addressing the criticisms made by the Office for Environmental Protection.
- A programme to designate more and improve existing sites for habitats and species.
- Build species into new planning reforms.
- A suite of actions, informed by the EIP review, to recover the habitats that species need in farmed landscapes, freshwater and at sea.

With swift and urgent action for species, the new Government can embark on the policy pathway needed to achieve the species targets by 2030 and 2042.

(1) Review the Environmental Improvement Plan

The Environmental Improvement Plan (EIP) should set out how the Environment Act targets, including the species targets, will be achieved. Currently, however, the EIP is not fit-for-purpose: it does not set out how the policies, actions and funding in the EIP add up to meeting the targets and it has no detailed delivery plan. The Office for Environmental Improvement (OEP) has called for the Government to scale up, speed up and demonstrate how plans stack up.⁵

During the General Election campaign, the Labour Party committed to review the EIP to make it more effective at meeting Environment Act targets.⁶ This welcome commitment should be swiftly delivered in Government.

⁴ <https://labour.org.uk/wp-content/uploads/2024/06/Change-Labour-Party-Manifesto-2024-large-print.pdf>

⁵ <https://www.theoep.org.uk/report/government-remains-largely-track-meet-its-environmental-ambitions-finds-oep-annual-progress>

⁶ The Labour shadow minister for nature, Toby Perkins, committed to reviewing the EIP to ensure Environment Act targets are met, at the Great Nature and Climate Debate on 17 June 2024 at Chester Zoo.
<https://www.wcl.org.uk/general-election-hustings-held-on-environmental-policy.asp>

Defra should review the EIP to identify and fill gaps between ambition and delivery for the species targets and other environmental targets, addressing the points raised by OEP. The refreshed EIP should set out a path over the next six years to achieving the species abundance and extinction targets, including what policies, actions, and level of funding is needed.⁷

This should include Environment Land Management (ELM), which is intended to play a large role in delivering the species targets. However, currently ELM is not designed nor sufficiently funded to achieve its ambitions. Research suggests that the design and investment in ELM schemes must be increased to meet the scale of need.⁸ **The refreshed EIP should set out what contribution ELM schemes will be expected to make to recovering species against cohesive delivery timescales and what design, spatial prioritization, and levels of funding will be required to deliver results on the ground.**

The refreshed EIP should also address the serious concerns raised by the OEP concerning lack of information, including the inadequate completeness, spatial resolution and timeliness of data essential to monitoring and informing efforts to achieve species abundance.

To improve the environmental evidence base, **the Government should invest in filling data gaps for poorly understood and low-data species, including mobile species at sea, and should invest in standardising data recording, verification, management and sharing.** The Government should set national standards for environmental data to improve monitoring and create a shared data platform accessible to all. An Environmental Observatory could include all existing government-held data and resources and should signpost to other data sources, such as the species data platform run by the National Biodiversity Network Trust (NBN Atlas), data from NGOs, data from Local Environmental Record Centres and information collected by Local Nature Partnerships and Local Nature Recovery Strategies.

The Government **should also improve the existing species abundance metric in a robust and transparent way to include more species**, in particular those in the freshwater, estuarine, marine and invertebrate realms.⁹

⁷ See Green Alliance & Link briefing on what a successful review would look like:

<https://www.wcl.org.uk/docs/Government-review-of-the-environmental-improvement-plan.pdf>

⁸ <https://www.nationaltrust.org.uk/services/media/new-study-finds-at-least-gbp4.4bn-a-year-needed-for-nature-and-climate-friendly-farming-to-meet-legal-targets>

⁹ See this Link briefing on the species abundance indicators for more detail:

https://www.wcl.org.uk/docs/Link_briefing_Indicators_of_species_abundance_July2024.pdf.

The Government should **produce a list of priority species for reintroduction as part of a long-term strategy on species reintroduction** in parallel with the England Species Reintroductions Taskforce (with the exception of very species-rich taxa such as invertebrates).¹⁰ In some cases, species translocations and reintroductions can support individual wildlife populations and/or support wider ecosystem recovery. A variety of species, including the netted carpet moth, freshwater mussels, the white-tailed eagle and water voles, have been successfully reintroduced in England.¹¹ Of course, it is important that the risks from disease and other threats are assessed before reintroduction takes place. Ecologically balanced species translocations and reintroductions are one important conservation tool which can contribute to achieving the species targets.

The Government is also required to publish a national plan to meet the Global Biodiversity Framework targets before the next Convention on Biological Diversity (COP16) in October 2024. **This National Biodiversity Strategy and Action Plan (NBSAP) must draw from and align with the revised EIP and detail the commitments, action, strategies and finance needed to make the global target to halt and reverse the decline of nature by 2030 a reality.** Backed up by domestic ambition and implementation through its NBSAP, the UK can demonstrate leadership on the international stage.

(2) Designate more and improve existing sites for habitats and species

The UK has committed to protecting and managing at least 30% of land and sea for nature by 2030 (also known as 30x30), a non-legal commitment first made in 2020 and reinforced by the Global Biodiversity Framework the UK is a signatory to. Studies show that protected sites support more species than unprotected sites by providing undisturbed areas for species to rest and forage. However, protected sites in the UK lose some species at an equally rapid pace to unprotected areas.¹² The protected sites network is a cornerstone conservation tool, but it must be expanded and improved to ensure that it genuinely enables species recovery.

As of 2023, however, only just over 3% of England's land is protected and well-managed for nature and approximately 8% of England's seas are protected from the most damaging form

¹⁰ This was also recommended by the Environmental Audit Committee (EAC) in their 2023 report on Species Reintroductions: <https://committees.parliament.uk/publications/40795/documents/198792/default/>

¹¹ <https://publications.naturalengland.org.uk/publication/4940855555915776>

¹² <https://www.sciencedirect.com/science/article/pii/S0006320722004372#:~:text=Protected%20area%20effectiveness%20depends%20on,increasing%20species'%20population%20sizes>

of fishing.¹³ **The Government must publish an action plan to achieve 30x30** to fulfill its international commitment – but more importantly, to ensure that habitats are improved, expanded, and better connected across the country to support wildlife populations.

This plan must include a commitment to expanding the protected sites network,¹⁴ alongside existing Government commitments to improve the protected sites network.¹⁵ At its current coverage, the protected sites network does not sufficiently cover the habitats that England’s most threatened species need to recover in.¹⁶ **The Government should significantly expand the protected sites network in England, beginning by publishing and implementing the recommendations from the UK Special Protected Areas (SPAs) Review in 2016** and following the recommendations from the previous 2011 review, to help plug the critical gaps in England’s protected sites network for vulnerable species such as curlews, hen harriers, and puffins.¹⁷ The 2011 review also recommended that the protected sites network not be seen as wholly ‘representative’ network (protecting only examples of natural habitats), but instead look to designate all that remains of rare habitats, habitats already identified as important for species such as Important Plant Areas and Important Invertebrate Areas, all the habitats threatened species rely on, as well as a representative sample of widespread and common habitat types.

Protected landscapes, National Parks and National Landscapes (previously known as Areas of Outstanding Natural Beauty or AONBs), also have vast potential to support wildlife, which is often untapped. Unfortunately, nature within protected landscapes is typically in no better condition, and protected sites in these areas are less likely to be in good condition than those outside protected landscapes.¹⁸ To make protected landscapes work better for nature, **the Government must quickly publish regulations to require Protected Landscape Management Plans to contribute to meeting targets under Part 1 of the Environment Act 2021, including the species abundance targets, and require that relevant public bodies collaborate on delivery.** These regulations, promised under the Levelling Up and Regeneration Act 2023,

¹³ https://www.wcl.org.uk/docs/WCL_2023_Progress_Report_on_30x30_in_England.pdf

¹⁴ The protected sites network includes Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites.

¹⁵ The Environmental Improvement Plan (EIP) already contains a commitment to have 75% of SSSIs in favourable condition by 2042, up from 38% of SSSIs in favourable condition in April 2023, and a legally-binding target to have 70% of the protected features of Marine Protected Areas (MPAs) in favourable condition by 2042. <https://naturalengland.blog.gov.uk/2023/08/24/investing-in-sites-of-special-scientific-interest-sssis/>

¹⁶ <https://data.jncc.gov.uk/data/c0886a17-1745-439e-a7cb-dd61e728ffd8/jncc-report-722.pdf>

¹⁷ <https://data.jncc.gov.uk/data/d1b21876-d5a4-42b9-9505-4c399fe47d7e/ukspa3-status-uk-spas-2000s-web.pdf>

¹⁸ <https://www.cnp.org.uk/wp-content/uploads/2024/04/National-Parks-Health-Check-Report-Nature-Recovery-2024.pdf>

would boost National Park protections and enable a greater contribution to achieving Environment Act targets.¹⁹

At sea, the Government must **conduct an SPA and SAC Sufficiency Review** to provide mobile species, and those species they rely on, the protection they need. The Government should also adopt as policy and commit to delivering the actions identified in the English Seabird Conservation and Recovery Pathway review. To ensure MPAs are protected across the whole site rather than simply the designated features, the Government must also **deliver its commitment to ban bottom trawling and other damaging fishing practices across the MPA network through a series of new byelaws.**

(3) Build nature into planning reforms

The new Government has committed to extensive development on land and sea, to deliver new housing and renewable energy. It is critically important that the needs of species be built into these reforms and mainstreamed into existing planning policy, to ensure planning makes a positive contribution to efforts to achieve the species abundance target.

Strategic planning is needed to ensure the UK meets the species abundance target and other environmental targets, alongside delivering affordable housing and the scale and pace of renewables development needed. The new Government should actively plan for nature's recovery through the planning process. **A Land Use Framework and National Spatial Plan should integrate national and local decision-making across different land uses, including nature, net zero, farming and planning and development,** to guide greener land use decisions and achieve a healthy natural environment.

At sea, **a national Marine Spatial Prioritisation Plan should allocate sea space around the country for priority marine activities** and prioritise space for the protection and recovery of nature and the ecosystems it relies on. This process would also see priority allocation of space for the deployment of offshore renewable energy and blue carbon habitats.

Local Nature Recovery Strategies (LNRSs) are a new statutory requirement for local areas to produce a spatial strategy to map and set priorities for biodiversity. These have the potential to coordinate and drive action and investment in nature's recovery at a local level. However,

¹⁹https://www.wcl.org.uk/docs/Letter_to_Minister_Pow_Protected_Landscapes_guidance_regs_5April2024.pdf

without mechanisms to implement LNRs, they risk being another strategy sitting on a shelf. The Levelling Up and Regeneration Act introduced a new duty for local planning authorities to ‘take account of’ LNRs in local plans, however, it is not yet clear what this new duty entails. **The Government should swiftly publish guidance for local planning authorities to make it clear that ‘taking account of’ LNRs in local plans means incorporating policies that would deliver the objectives of the LNRs**, in order to give LNRs sufficient planning weight to inform strategic and specific planning decisions.

The Government should mandate nature-friendly design in all new housing development, including swift bricks, bat boxes, bee bricks, wildlife tunnels, green and brown roofs on flat spaces, where these measures are appropriate, and other green and blue infrastructure.²⁰ This could be done through a new biodiversity chapter of the Building Regulations or through new powers from the Levelling Up and Regeneration Act to introduce National Development Management Policies (NDMPs). This should include **implementing Schedule 3 of the Flood and Water Management Act 2010** (due to be implemented in 2023, but delayed) which would deliver more Sustainable Drainage Systems (SuDS) in new housing developments, improving water drainage and boosting biodiversity.

At sea, this should be done by **delivering the Offshore Wind Environmental Standards (OWES) and avoiding development in MPAs**. Where avoidance is not possible and all efforts have been made to avoid, reduce and mitigate environmental harm, ecologically robust compensation options should be explored as a last resort. OWES are a speedy and cost-effective measure for Government to help ensure that new development meet environmental standards while speeding up the planning process. The Government should work with industry and The Crown Estate to outline options for nature-inclusive design measures which will ensure offshore industries leave surrounding habitats and species in a better condition than when development began. **All compensation which delivers an expansion to the MPA network must show how it contributes to EIP targets.**

Biodiversity Net Gain (BNG), the requirement for development to leave the natural environment in a measurably better state than it was beforehand, is now mandatory for Town and Country Planning Act (TCPA) development. Done well, BNG has the potential to back up policy protections for nature at the same time as harnessing a contribution from development for more habitats for wildlife. However, despite previous Government commitments, currently major infrastructure projects do not have to deliver net gain. **The Government**

²⁰ See Natural England’s Green Infrastructure Standards (currently voluntary) for more information: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspx>

should quickly publish a consultation on applying a BNG requirement of more than 10% to Nationally Significant Infrastructure Projects (NSIPs) and support robust delivery of BNG by supporting local planning authorities to go beyond the 10% minimum and ensuring authorities have sufficient resources for monitoring and enforcement of BNG.²¹ The Government should review the sufficiency of 10% gain a year after BNG became mandatory, considering whether the balance of on- and off- gain is contributing enough to nature recovery, and whether the statutory minimum should be increased.

The Government has also begun consulting on and designing net gain at sea – Marine Net Gain (MNG). Given the vast amount of offshore energy development expected in the next few years, it is essential to put a robust MNG approach in place to ensure development improves the state of England’s seas. **The Government should quickly progress MNG by consulting as soon as possible on how MNG can most effectively deliver Environment Act targets, including an associated metric** which includes connectivity and species, so that the policy delivers species recovery alongside habitat creation.

The Government should also invest further in environmental planning. The Labour Party has committed to funding additional planning officers in local planning authorities (LPAs). In office, the new Government should go further to ensure planning authorities, including LPAs and the Planning Inspectorate, and statutory nature conservation bodies, such as Natural England and the Environment Agency, have the capacity and ecological skills required to improve the protection of species and their needs in all planning processes, including Biodiversity Net Gain.

(4) Recover the habitats that species need in farmed landscapes, freshwater and at sea

To halt and reverse the decline of species abundance, a new Government must quickly and robustly tackle pressures on species, across farmland habitats, freshwater and the sea.

The Government should quickly introduce ambitious reduction targets for highly hazardous pesticides, phase out pesticides like glyphosate in urban areas, and end repeat emergency authorisation for harmful neonicotinoids and other banned pesticides which poison wildlife such as bees and amphibians. The Government should also look to ban or phase-out other hazardous chemicals such as insecticides that are banned for use on crops from veterinary or

²¹ Further information on BNG in this report:

https://www.wcl.org.uk/docs/Biodiversity_Net_Gain_progress_report_7.2.2024.pdf

medical use and PFAS (including PFAS in pesticide formulation) for all non-essential uses by 2035.

Some farming practices can also increase other forms of pollution, especially in the fragile freshwater environment, which is already in overall a poor ecological and chemical state.²² Defra data from 2021 points to diffuse farming pollution as being responsible for over 40% of freshwaters failures to meet good ecological status.²³ **The Government should publish its response (as required by law to be published by mid-August) to the OEP's Water Framework Directives (WFD) report,**²⁴ which should set out actions to improve implementation of the WFD, including filling gaps in monitoring, strengthening governance, increasing investment, and requiring River Basin Management Plans to have specific, time-bound and costed measures.

The Government should rectify previous failures to enforce the Farming Rules for Water by clarifying to the Environment Agency that they should enforce these vital laws which prevent agricultural pollution and adequately resourcing the regulator so they have sufficient capacity to monitor and enforce compliance. **The Government should also introduce a 'Green Duty on Ofwat (and other relevant public bodies)** to enable the water industry regulator to take a greater environmental focus.²⁵ This would ensure that regulatory decisions are made with a view to maximising how investment will deliver the best environmental outcomes, enabling delivery of low carbon, multi-benefit infrastructure by default, and contributing to the delivery of the Environment Act targets.

Implementing nature-based solutions (NBS) for flood management, climate adaptation, and improving water quality, such as creating and restoring freshwater and coastal habitats such as wetlands will improve the quality of the wider natural environment as well as provide more habitats for species. The Government should **issue stronger direction to regulators such as Ofwat and the Environment Agency to prioritise nature-based solutions in their regulatory framework, backed up by national guidance** to ensure high-quality NBS projects which also deliver for biodiversity and species. This will ensure that those who the regulators regulate

²² <https://www.gov.uk/government/publications/state-of-the-water-environment-indicator-b3-supporting-evidence/state-of-the-water-environment-indicator-b3-supporting-evidence>

²³ <https://anglingtrust.net/2022/04/21/lack-of-action-on-agricultural-pollution-is-killing-our-rivers/>

²⁴ <https://www.theoep.org.uk/report/oep-finds-deeply-concerning-issues-how-laws-place-protect-englands-rivers-lakes-and-coastal>

²⁵ More information on how a Green Duty could work and be enacted here:
<https://www.wcl.org.uk/docs/Policy%20note%20-%20Apply%20a%20Green%20Duty%20to%20public%20bodies.pdf>

such as water companies, farmers and land managers, and other regulated industries are prioritising and delivering high-quality nature-based solutions.

Another source of pollution across countryside habitats is the ongoing use of lead ammunition, due to delays to ban proposals under the previous Government. The next Government will have to decide within three months of the final ban recommendation being submitted to Defra by UK REACH in September 2024. A comprehensive and swiftly implemented ban is needed to address the impact that lead pollution from ammunition use has on the abundance of waterbird species and birds of prey.²⁶

Invasive non-native species also pose a significant threat to UK species. **The Government should increase the powers of the Invasive Species Inspectorate so that it may carry out border inspections** to prevent any new invasive species and diseases from entering the UK.

At sea, as well as improving the Marine Protected Area (MPA) network, there are swift actions the Government must take to improving the wider state of the natural marine environment. **The Government must publish an updated UK Marine Strategy: Part 3** which sets out the programme of measures the UK intends to use to achieve or maintain Good Environmental Status (GES) for UK seas. **Ministers should swiftly ratify the Global Ocean Treaty, in line with a General Election commitment, to signal leadership in marine protection on the international stage.**²⁷

The Government could also quickly tackle unsustainable environmental practices such as overfishing by **delivering on its commitment to introduce fisheries management measures for all English offshore MPAs by the end of 2024.** The Government should also set fishing opportunities in line with scientific advice from the International Council for the Exploration of the Sea (ICES), ensure sufficient biomass is available for marine predators like cetaceans and seabirds, and effectively resource and implement a plan to tackle bycatch of sensitive species, including the introduction of Remote Electronic Monitoring (REM) with cameras onboard all vessels operating within the Exclusive Economic Zone.

²⁶ <https://www.wwt.org.uk/news-and-stories/news/wwt-joins-politicians-to-bring-an-end-to-toxic-lead-pollution>

²⁷ In June 2024, Labour committed to making this one of the first legislative actions they would undertake in Government: <https://www.wcl.org.uk/general-election-hustings-held-on-environmental-policy.asp>

Conclusion

With just one Parliament to go until 2030, the next Government must take swift and urgent action to ensure robust plans are in place, expand and improve the protected sites network, put nature at the heart of planning reforms, and take action to recover the habitats that species need.

By taking these actions within its first 100 days of office, the Government will be able to put us on the path to achieve the vital and legally-binding targets to halt the decline of species abundance by 2030, reverse the trend by 2042, and reduce the risk of extinction of our most threatened species by 2042.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 82 organisations to use their joint voice for the protection of the natural world.

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