Only those submissions written specifically for the Committee and accepted by the Committee as evidence for the inquiry Natural Environment White Paper are included.
List of written evidence

1 British Association for Shooting and Conservation (BASC)
2 Countryside Alliance
3 Soil Association
3A Soil Association (further submission)
4 The Open Spaces Society
4A The Open Spaces Society (further submission)
5 Landscape Institute
5A Landscape Institute (further submission)
6 British Ecological Society
7 Plantlife
7A Plantlife (further submission)
8 Food Ethics Council
9 Centre for Ecology & Hydrology
10 Royal Society for the Protection of Birds (RSPB)
10A Royal Society for the Protection of Birds (RSPB) (further submission)
11 Woodland Trust
11A Woodland Trust (further submission)
12 Campaign to Protect Rural England (CPRE)
12A Campaign to Protect Rural England (CPRE) (further submission)
13 Campaign for National Parks
14 Friends of the Earth England
15 London Wildlife Trust
16 Game & Wildlife Conservation Trust (GWCT), the Farming & Wildlife Advisory Group (FWAG) and Linking Environment and Farming (LEAF)
17 English Heritage
18 Field Studies Council
19 Town and Country Planning Association (TCPA)
19A Town and Country Planning Association (TCPA) (further submission)
20 Local Government Association (LGA)
20A Local Government Association (LGA) (further submission)
21 Food and Drink Federation
22 National Farmers’ Union (NFU)
22A National Farmers’ Union (NFU) (further submission)
23 Ofwat
23A Ofwat (further submission)
24 Country Land and Business Association (CLA)
24A Country Land and Business Association (CLA) (further submission)
25 National Trust
25A National Trust (further submission)
26 Water UK
26A Water UK (further submission)
27 The Ramblers
27A The Ramblers (further submission)
28 Ewan Larcombe, Leader of the National Flood Prevention Party
29 Research Councils UK (RCUK)
29A Research Councils UK (RCUK) (further submission)
30 Heritage Lottery Fund
31 Natural History Museum
31A Natural History Museum (further submission)
32 International Fund for Animal Welfare (IFAW)
33 British Mountaineering Council
34 WWF-UK
34A WWF-UK (further submission)
35 Wildlife and Countryside Link
35A Wildlife and Countryside Link (further submission)
36 CEMEX UK
37 The Wildlife Trusts
37A The Wildlife Trusts (further submission)
38 Central Association of Agricultural Valuers
39 British Standards Institution (BSI)
40 Professor Colin Reid
41 The Peak District Green Lane Alliance
42 Confor
43 Consumer Council for Water
44 GreenLINK
45 England and Wales Wildfire Forum
46 ESRC Centre for Genomics in Society (EGENIS), University of Exeter
47 RenewableUK
48 Institute of Chartered Foresters
49 Association of Electricity Producers (AEP)
50 Northumbrian Water Ltd
51 UK Environmental Law Association (UKELA)
52 Anglian Water
53 Hampshire County Council
54 EDF Energy
55 Institute of Ecology and Environmental Management (IEEM)
56 The Horticultural Trades Association (HTA)
57 The National Federation for Biological Recording (NFBR)
58 Royal Institution of Chartered Surveyors (RICS)
59 James Del Mar
60 Miss Maria Crastus
61 The Forest Town Nature Conservation Group (FTNCG)
Shooters can help the government realise its ambitions but there is no mention of shooting in the white paper. This is a major omission and the EFRA committee should recommend that Defra rectifies this situation, drawing on the following five points:

1. **Shooting in the UK is involved in the management of two-thirds of the rural land area.** Two million hectares are actively managed for conservation. Shoot providers spend £250 million a year on conservation and in total, shooting is worth £1.6 billion [GVA] to the UK economy. These figures are taken from the independent study *The Economic and Environmental Impact of Sporting Shooting*. This is a staggering amount of land, illustrated by the fact that shooters in the south east of England manage three times more land than all the land managed by the Wildlife Trusts across the UK.

2. **Land managed for shooting contains a wealth of wildlife.** As part of its Green Shoots project BASC has surveyed over 7,700 sq km of land managed by BASC members in Northern Ireland, North Wales, Cheshire, Somerset Levels and Dorset. From these surveys BASC members have generated over 52,000 new records for species and habitats of conservation concern, transforming the conservation community’s knowledge of their distribution and status.

3. **Shooters are successful at partnership working to achieve landscape scale improvements to our natural environment.** In Cheshire BASC members are working together with Cheshire’s Biodiversity Partnership to create 17 km of linked hedgerow and woodland to link together two isolated dormouse populations. Stretching from the Somerset Levels to the south coast BASC members have created a landscape level lifeline for the water vole by working with Natural England, the Environment Agency and Somerset/Dorset Wildlife Trusts to control mink and improve water vole friendly habitats. Four independent studies have shown unprecedented increases in the water vole population due to this project.

4. **Shooters create recreational opportunities.** BASC has developed the £1.6 million Country Sports South West project to help rural businesses which offer country sporting activities with marketing and delivery of a quality product. The team also provide advice on starting new sporting enterprises. The project is supported by the South West RDA, Defra and West Country Rivers Trust.

5. **Shooters can help the government realise its ambitions.** Shooters have been conserving wildlife for hundreds of years. They understand that a healthy quarry population relies upon good quality habitat and this concept
remains at the heart of sporting shooter’s ethos today. Shooters work hard to help the environment yet they rarely see any statutory recognition of that work. This government must redress the balance and a good starting point some recognition of shooting is needed in the Natural Environment White Paper.

1 www.shootingfacts.co.uk
2 www.basc.org.uk/en/conservation/green-shoots/

16 June 2011
Written evidence submitted by Countryside Alliance (NEWP 02)

The Countryside Alliance is the major British campaigning organisation on rural issues. With over 105,000 members the Countryside Alliance defends and promotes the rural way of life.

The Countryside Alliance welcomes this opportunity to respond to the Environment, Food and Rural Affairs Select Committee’s call for evidence on the Natural Environment White Paper (NEWP).

David Cameron came to power promising to deliver the greenest government ever and with the publishing of *The Natural Choice*, the first White Paper on the natural environment in 20 years, we see an agenda for a flourishing future for the natural environment. This is a much needed start in repairing the damage which has been done to the environment in the recent past, in the absence of an overarching strategy across Government.

While the Countryside Alliance recognises there is much to be welcomed in the NEWP we feel that the White Paper fails to acknowledge the role rural communities are already playing in managing the natural environment.

Any key elements in the White Paper which are supported;

1. The Countryside Alliance welcomes in particular the encouraging statements about the importance of outdoor learning. We have long campaigned for greater freedom to get children out of the classroom and into the countryside. Our research has shown that 85 per cent of children and young people want to take part in countryside activities at school, and 97 per cent of teachers surveyed believed it is important for children to learn about the countryside within the National Curriculum.

2. However, Defra’s clear commitment to learning outside the classroom in the NEWP needs to be endorsed and supported by the Department for Education.

Any particular sections which could be improved;

3. While the Countryside Alliance recognises there is much to be welcomed in the NEWP we feel that the White Paper fails to acknowledge the role rural communities are already playing in managing the natural environment.

4. The countryside is not an ‘experiment’ or recreational area; it is a fully functioning and evolving environment which covers our country in its many varied forms. Management has to be local in order to remain sustainable and cannot be the result of centrally imposed diktats or targets. The vital importance of localism has always been key to the ethos of the Countryside Alliance; a belief in empowering people to take care of their own environment and reap the benefits of their labours.

5. The White Paper claims that ‘nature is sometimes taken for granted and undervalued’, but this is simply not the case for those thousands of individuals who love the countryside and have a vested interest in its future. The Government seems to have missed an opportunity to recognise and support the ‘Big Society’ as it already exists in the countryside, where rural communities undertake hundreds of millions of pounds worth of unpaid conservation work each year for the benefit of all. It is our belief that the Government should make it a priority to support them in this role.
Any omissions from the White Paper which Defra should rectify

6. The Secretary of State has stated ‘we need to recognise that if we withdraw something from Mother Nature’s bank, we’ve got to put something back in to ensure that the environment has a healthy balance and a secure future’, which is right. The Natural Choice contains some bold policy recommendations, which if delivered will ensure a healthy balance and a secure future for the natural environment, but the White Paper contains no clear plan for delivery, nor is it backed up with sufficient resources to ensure its objective of a promising future for the natural environment.

21 June 2011
Written evidence submitted by the Soil Association (NEWP 03)

This response is made on behalf of the Soil Association and produced by its policy department. The Soil Association is the main organisation for organic food and farming in the UK, and is a membership charity with over 27,000 members including approximately 4000 producer members. The Soil Association also owns an accredited organic certification company.

- Any key elements in the White Paper which are supported;

1. With regard to the Nature Improvement Areas policy, investment in reconnecting nature and improving biodiversity at the landscape scale is to be supported (Chapter 2, 2.27, page 21). However, this policy lacks detail on what changes this will mean in practice. We hope that land managers and farmers who are using farming systems that enhance biodiversity, such as organic, ¹ will be supported within this scheme.

2. With regard to the ‘reconnecting people and nature’ theme (Chapter 4), we support commitments to improving adult and children’s access to the outdoors, particularly opportunities for growing their own food.

3. We welcome the commitment to undertake a significant research programme to explore how soil degradation can affect the soil’s ability to support vital ecosystem services (Chapter 3, 2.60, page 28). Of course, we hope that research into the role that organic farming systems can play with regard to this, will form a key part of this programme.

- Any particular sections which could be improved;

4. We disagree with the statement that one of the major challenges is to increase food production in the UK (Chapter 2, 2.46, page 23). We believe that the assumptions behind this should be challenged, drawing on the available evidence. We believe that the a key priority for addressing the problems of feeding a growing world population, and the environmental destruction and greenhouse gas emissions caused by our current food and farming system, is a change in diets in the Global North. There are widespread concerns about the health impacts that the structural changes in diet have already had in the Global North, and that are increasingly occurring in the Global South. Such diets are a leading cause of non-communicable diseases including cardiovascular disease, some cancers and Type 2 diabetes. ²

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• Any omissions from the White Paper which Defra should rectify.

5. We believe it is possible to produce food and protect and enhance the natural environment at the same time, on the same land area through farming systems, like organic that can enhance biodiversity. Thus, it was disappointing there was no new, strong commitment to reversing the decline of wildlife in the UK countryside (particularly farmland bird populations) through supporting farming systems, such as organic.

6. The Government failed to take the opportunity in the White Paper to give a clear steer on how management of the natural environment can contribute to climate change mitigation (and not just adaptation to its effects) through encouraging measures such as agricultural practices that promote the sequestration of carbon in soils and the reduction of nitrous oxide emissions.

7. It was also disappointing that there was no clear acknowledgement that we are now living in a resource-constrained world and are facing water shortages, as well as the reality of peak oil and peak phosphorus. These resource constraints will impact on our ability to produce food and protect the natural environment in the future.³

20 June 2011

³ Soil Association (2010) A rock and a hard place: Peak phosphorus and the threat to our food security http://www.soilassociation.org/LinkClick.aspx?fileticket=eeGPOJORrkw%3D
Further written evidence submitted by the Soil Association (NEWP 03A)

This response is made on behalf of the Soil Association and produced by its policy department. The Soil Association is the main organisation for organic food and farming in the UK, and is a membership charity with over 27,000 members including approximately 4000 producer members. The Soil Association also owns an accredited organic certification company.

The committee is seeking evidence from interested parties and invites submissions on the following areas:

- What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?
- What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

1. We welcome the focus on ‘Getting the best value from agricultural land’ (Chapter 2, 2.45, page 23) and the recognition of the role for farmers and land managers in achieving society’s ambitions for water, wildlife, healthy soil and food production and the management of landscapes. We welcome the recognition that farming needs to be supported in building capacity for environmentally sustainable production both in the UK and globally.

2. We believe that organic farming can play a key role in delivering these numerous public goods and ecosystem services (as mentioned above - water and soil protection, biodiversity enhancement, and landscape management), along with food production, but also climate change mitigation and adaptation. As a system, organic farming is often able to deliver the objectives much more efficiently than an approach which relies on a myriad of policy interventions which attempt achieve each objective separately. The compliance costs (inspection and certification) are already met by organic farmers and growers. The delivery of multiple public goods is an inescapable output of every organic farm business.

3. There is now significant amount of scientific evidence of the ecosystem services that organic farming delivers. With regard to the protection of biodiversity, there are three important studies:
• In 2005, a literature review of 66 published studies that compared organic and non-organic farming systems, concluded that on average wildlife is 50% more abundant on organic farms and there are 30% more species, than on non-organic farms.¹

• Another 2005 scientific literature review by English Nature and Royal Society for the Protection of Birds (RSPB) found evidence of the biodiversity benefits of organic farming systems (compared to non-organic systems) for a wide range of wildlife including birds, mammals, spiders, earthworms, beetles and plants. ²

• An extensive survey by the British Trust of Ornithology in 2005 of lowland farms containing cereal crops in England, found that organic fields held more plant species and a greater abundance of weeds than non-organic farms. It found 5-48% more spiders in pre-harvest crops, 16-62% more birds in the first winter, and 6-75% more bats.³

4. We do not think enough emphasis has been placed in the White Paper on mitigating climate change, (the emphasis appears to be on adaptation - Chapter 1, section 1.15, page 10) and particularly the positive role that the agriculture sector can play in this. A significant contribution to the potential of organic farming systems to mitigate climate change comes from carbon sequestration in soils. Several field studies have proved the positive effect of organic farming practice on soil carbon pools.⁴ A recent review by the Soil Association of 39 comparative studies of soil carbon levels found, on the basis of evidence so far available, that organic arable farming practices produce 28% higher soil carbon levels than non-organic farming in Northern Europe, and 20% for all countries

studied.\textsuperscript{5} In addition, manufactured nitrogen fertilisers that contribute GHG emissions in their manufacture and use, are not used in organic systems, where legumes and cover crops extract plant-available nitrogen unused by the preceding crops and keep it in the system.\textsuperscript{6}

5. Support for organic farming is therefore essential in helping to deliver the White Paper’s ambitions in this regard.

6. With regard to the reform of the CAP in this context (Chapter 5, section 5.20, page 63 and Chapter 2, section 2.52 page 25) the Soil Association is keen that as all of Pillar 1 of the CAP is not going to be moved to Pillar 2, then payments made under Pillar 1 should deliver environmental outcomes. This will ensure that public goods are supported by all CAP payments. The EU Group of the International Federation of Organic Agricultural Movements (IFOAM), of which the Soil Association is a part, agrees that organic farming should be included in Pillar 1, as part of public goods/agri-environment delivery measures with 100% EU funding. Alongside this, Pillar 2 should continue to include organic options that are applied consistently throughout the EU as part of all the public goods/agri-environment measures.

7. We disagree with the statement that one of the major challenges is to increase food production in the UK (Chapter 2, 2.46, page 23). We believe that the assumptions behind this should be challenged, drawing on the available evidence. We believe that a key priority for addressing the problems of feeding a growing world population, and the environmental destruction and greenhouse gas emissions caused by our current food and farming system is a rebalancing of in diets in the Global North, as suggested in the UK by the Government’s Climate Change Committee. There are widespread concerns about the health impacts that the structural changes in diet have already had in the Global North, and that are increasingly occurring in the Global South. Such diets are a leading cause of non-communicable diseases including cardiovascular disease, some cancers and Type 2 diabetes.\textsuperscript{7} An environmentally sustainable farming system in the UK would deliver a healthy diet.


8. We do not think that the voluntary approaches mentioned in section 2.48 (Chapter 2, page 24), the industry-led Campaign for the Farmed Environment and the Greenhouse Gas Action Plan will deliver the changes in agriculture that are needed. The former has not succeeded so far, and in the case of the latter, we note the Climate Change Committee’s comment that voluntary approaches have not worked in any other sector of the UK economy. Farming may be left having to make massive cuts in GHG emissions in later years due to a failure to act decisively now. In addition, the voluntary approach runs the risk of not making the most of the crucial role that soil carbon sequestration can play in reducing GHG emissions from agriculture.

- **What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?**

9. We welcome the commitment to undertake a significant research programme to explore how soil degradation can affect the soil’s ability to support vital ecosystem services (Chapter 3, 2.60, page 28). Of course, we hope that research into the role that organic farming systems can play with regard to this will form a key part of this programme.

- **Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?**

10. With regard to the ‘reconnecting people and nature’ theme (Chapter 4), we support commitments to improving adult and children’s access to the outdoors, particularly opportunities for growing their own food.

11. With regard to effective proposals for re-engagement, a project with demonstrated success in reconnecting people with the natural environment, countryside and food production, is the Soil Association’s Community Supported Agriculture scheme. Community supported agriculture (CSA) is a growing movement that offers communities the opportunity for a stronger, closer and more meaningful relationship with the production of their food; enterprises generally trade with a core of loyal members and largely take payment in advance, providing secure income and a healthy cash flow for farmers and growers.

12. The Soil Association has been supporting the development of CSA in the UK for over 12 years, most recently through a four year Big Lottery funded partnership project called Making Local Food Work. As part of this work the Soil Association funded an evaluation of the impact of CSA which found that over 80 CSA enterprises are now providing
multiple benefits to their thousands of members and over 120 new schemes are in development.

13. The study revealed that CSA has a significant effect on their members' behaviour, health, skills and well-being with 70% saying that their overall quality of life has improved. CSA initiatives raise awareness of food and sustainability issues, create volunteering, employment and educational opportunities on the land, and benefit surrounding wildlife through improved land management practices. Over half of the trading CSA enterprises have made the land they are on more accessible to the public and many CSA members with children stress the importance of their involvement in developing their children’s understanding and experience of food production and sustainability issues. Many members state that a key appealing feature of their initiative is that it provides a more environmentally friendly alternative to the mainstream food system and that their closer relationship with how their food is produced has changed their cooking and eating habits for the better.

14. The key findings from the study:

- 56% have increased the amount of land managed according to organic principles;
- 55% have planted more hedges and trees; 61% have introduced new wildlife areas.
- 77% have increased diversity of production on their land.
- 53% have made land more accessible to the public.
- 29% consider that their approach has had a positive effect on the way their neighbours manage their land, including encouraging membership of stewardship schemes.
- 70% of members say that their cooking and eating habits have changed, primarily through using more local, seasonal and healthy food; 66% say that their shopping habits have changed, principally through a shift to more local shopping in addition to buying through the enterprise.
- Most enterprises provide some formal or informal training (71%), and a still greater proportion (77%) count education or training more broadly amongst the products and services they provide. 36% of CSA members feel that their skills have increased through their involvement.
- The vast majority of enterprises provide volunteering opportunities – averaging 44 volunteers per enterprise and over 100 in several cases.

26 September 2011
Any key elements in the White Paper which are supported
1. The recognition of links between environment and economy, and environment and public health.

2. The commitment to improve urban green infrastructure (2.78-81).

3. The plan for urban Quiet Areas (4.31).

4. The commitment to implement the recommendations of the Natural England working group on unrecorded rights of way, making it easier to claim public paths for the definitive map, and thus secure their protection (4.34).

Any particular sections which could be improved
5. Lack of clarity on how the proposed new designations (Local Nature Partnerships and Nature Improvement Areas) fit into planning system.

6. Lack of focus with Local Nature Partnerships and Nature Improvement Areas on the opportunities for public access and enjoyment.

7. The commitment to ‘place a clearer and more integrated framework to support farmers to achieve multiple benefits from their land’ (2.46) seems meaningless when Defra has removed funding for annual permissive access payments from Higher Level Stewardship.

8. Lack of information on proposed green space designation, which has been trailed for over a year with minimal information.
9. Clarify reference in 4.34 to ‘streamlining the processes for making changes to public rights of way’. The Natural England working group dealt only with claiming paths (and being able to move claimed paths), not on making it easier to alter other routes. It is acceptable if the reference is merely to claimed paths, but if government tries to extend this to making it easier to alter other routes, the hard-won consensus of the working group will fall apart. Public highways belong to everyone, and should only be altered after due process has been completed.

Any omissions from the White Paper which Defra should rectify.
10. Astonishingly, there is no mention of common land which uniquely provides a wealth of public benefits, for wildlife, landscape, history, archaeology and public enjoyment. Defra must pledge to ‘roll out’ nationally part 1 of the Commons Act 2006, which provides for updating of the commons registers. At present part 1 has only been applied to seven commons registration authorities. Defra should also make a commitment to protect commons for their many benefits.

11. There is no mention of completion of the coastal trail and access land, as set out in the Marine and Coastal Access Act 2009.

12. The White Paper ignores the importance of public access, by rights of way and access land. It must state what government will do to protect existing access and to provide more.

Note
The Open Spaces Society is Britain’s oldest national conservation body, founded in 1865. We campaign to create and conserve common land, town and village greens, open spaces, public paths and rights of public access, in town and country throughout England and Wales.

20 June 2011
Further written evidence submitted by the Open Spaces Society
(NEWP 04A)

1. The Open Spaces Society, formally the Commons, Open Spaces and Footpaths Preservation Society, is Britain’s oldest national conservation body, founded in 1865. We campaign to create and conserve common land, town and village greens, open spaces and public paths, in town and country, throughout England and Wales.

*Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?*

2. The White Paper is accurate as far as it goes. However, there are omissions.

3. It does not mention public paths as the most important means for people to gain access to the countryside. It is vital that these are well-marked, signposted and in good condition so that people can use and enjoy them. Public paths are an important part of our heritage and culture—indeed our history is written in the public paths across our landscape, the ways that people used day to day, to go to work, school or church.

4. The law and history of public paths should be taught in every school, so that people can not only be encouraged to use and enjoy them from a young age, but also to defend them. Highway authorities must have sufficient funding to carry out their statutory duties of protecting the path network for the public.

5. We are pleased with the pledge to implement the recommendations of the stakeholder group on unrecorded rights of way, which will streamline the processes for adding paths to the definitive map and ensure that historic ways are not loss—provided the necessary resources accompany this change in the law.

6. The White Paper does not mention coastal access, currently being delivered through the Marine and Coastal Access Act 2009. This legislation will bring health and happiness to thousands of people. Yet so far the government has only committed to finalising the routes and access land for the pilot sites. We need an assurance that these will be completed for the whole English coastline within the next few years, otherwise England will lag behind Scotland and Wales in having inferior coastal access. Furthermore, coastal access will bring much-needed income for coastal communities so it is a worthwhile investment.

7. There is no mention of England’s 400,000 hectares of unique common land. This provides a wealth of public benefits, for wildlife, landscape, history, archaeology and public enjoyment: 88 per cent of common land has a designation reflecting public benefit, and all commons have a public right of access. Defra needs to move swiftly to ‘roll out’ nationally part 1 of the Commons Act 2006 which provides for updating of the commons registers and will allow addition of land which was wrongly omitted, thereby providing
new access for walkers and horse-riders. At present part 1 has only been applied to seven pioneer commons registration authorities.

8. We are also concerned that Defra has removed funding for annual permissive access payments from Higher Level Stewardship. This is a retrograde step and will lead to a reduction in public access, yet public payments should of course secure greater public access.

26 September 2011
The Landscape Institute

The Landscape Institute (LI) is an educational charity and chartered body responsible for protecting, conserving and enhancing the natural and built environment for the benefit of the public. It champions well-designed and well-managed urban and rural landscape.

Reactions to the Natural Environment White Paper (NEWP)

1. Elements of the NEWP which are supported

1.1 The LI welcomes the NEWP as it sets out a strong vision for the natural environment. In particular, we support the following aspects:

- Recognition of the intrinsic value of nature, while acknowledging the need to value the economic and social benefits of a healthy natural environment;
- Commitment to a strategic approach in planning for nature within and across local areas;
- Retention of natural environment protection and improvement as a core objective in the planning system;
- Recognition of the importance of ‘landscape-scale’ and multifunctional approaches to land use;
- Acknowledgement of the need for green infrastructure generally and, in particular, in urban areas in order to complete the links in our national ecological network; and
- Commitment to review how land-owners, managers and farmers are advised and incentivised to create a joined-up approach.

2. Sections of the NEWP which could be improved

2.1 The definition of green infrastructure (p. 31) would be improved if it included explicit reference to its multifunctional nature, a defining feature of the concept.

2.2 Paragraph 2.35 states Government wants “…to encourage local authorities to promote multifunctional development so that we get the most from land”. This is an admirable objective, yet the NEWP lacks detail as to how this will be achieved.

2.3 Paragraph 2.37 relates to the forthcoming National Planning Policy Framework (NPPF). The NPPF will be one of the most critical factors in delivering the aspirations of the NEWP. The NPPF must embed the vision set out in the NEWP. At present, paragraph 2.37 is weak on the links between these publications.
2.4 Paragraph 2.80 states that green spaces will “…be managed to provide diverse functions for the benefit of people and wildlife” yet it is unclear how Government intends to make this happen.

3. **Any omissions from the NEWP which Defra should rectify**

3.1 The European Landscape Convention, of which the UK government is a signatory, provides an excellent framework for safeguarding landscape. It would be good if the NEWP outlined how its content helps contribute towards implementation.

4. **Suggestions for issues the Committee may wish to include in terms of reference for a possible future Select Committee inquiry into detailed aspects of the NEWP**

4.1 The importance of the forthcoming NPPF in facilitating much of the vision contained within the NEWP should not be underestimated. A future Select Committee inquiry could usefully explore the ways in which the reformed planning system is assisting/facilitating/hindering in the delivery of the Government’s vision for the natural environment.

4.2 The links with the Public Services Bill will be of significance as this will deal with local management of green spaces.

*20 June 2011*
1. The Landscape Institute

The Landscape Institute is the Royal Chartered body for landscape architects. As a professional organisation and educational charity, we work to protect, conserve and enhance the natural and built environment for the public benefit. We accredit university courses and promote professional development to ensure that landscape architects deliver the highest standards of practice. We work with government to improve the planning, design and management of urban and rural landscape. Through our advocacy programmes and support to our members we champion landscape, and the landscape profession, in order to inspire great places where people want to live, work and visit.

The LI’s membership currently stands at approximately 6000 landscape planners, designers, managers and scientists, all of whom have an interest in both the intrinsic value of nature as well as the economic and social benefits to be gained through the protection and enhancement of ecosystem services. The LI believes that a green infrastructure approach to land use planning, design and management is central to securing both of these while at the same time reconnecting people with nature.

The LI welcomes much of the thinking in the Natural Environment White Paper (NEWP), including many of the commitments on green infrastructure. In particular we are delighted to have been able to work with Defra in shaping the Green Infrastructure Partnership in recent months. We look forward to the launch of this exciting commitment and the concurrent launch of our new guide Local Green Infrastructure: helping communities make the most of their landscape\(^1\), scheduled to take place on 11 October 2011.

2. Summary

- Much of the progressive thinking contained within NEWP relies upon a planning system which puts the natural environment at the heart of decision-making in relation to the built environment. The current reforms of the planning system will fail to do this.
- The LI supports the NEWP commitment to integrate green infrastructure into the planning system. The only way to achieve this is to ensure that it is fully integrated into the Government’s planning reforms.
- Green infrastructure should be at the heart of local plans.

\(^1\) Local green infrastructure: helping communities make the most of their landscape, Landscape Institute 2011
3. What actions are required across Government departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

3.1. Government departments

It is important to have across government an agreed definition of green infrastructure. The LI supports the definition used in NEWP, although we would recommend including specific reference to multifunctionality. In its 2009 publication Green Infrastructure: Connected and Multi-functional Landscapes, LI defines green infrastructure as: “...the network of green spaces and other natural elements such as rivers and lakes that are interspersed between and connect villages, towns and cities”. This is a definition which sits comfortably with those commonly used by Natural England and the Forestry Commission. In recent months however, other areas of Government have been using the term in very different way, for example, both the Treasury’s National Infrastructure Plan and the Department for Business, Innovation and Skills’ White Paper, Local growth: realising every place’s potential, use the term to describe physical infrastructure such as offshore wind farms.

It is essential that there is greater ‘joined up thinking’ between Government departments. There is a real benefit and need for Government departments to integrate the true value of the natural environment into its decision-making. There should therefore be a consensus between Defra, CLG and the Treasury, local government and civil society in addressing these issues. The complete failure to coordinate work across departments is illustrated by the current approach to planning reform.

Much of the progressive thinking contained within NEWP relies upon a planning system which puts the natural environment at the heart of decision-making in relation to the built development. The current reforms of the planning system, as outlined in the draft NPPF, will fail to do this, despite Government advocating this approach in NEWP and the rich evidence base contained within the UK National Ecosystems Assessment.

The Natural Environment White Paper states: “The Government wants this to be the first generation to leave the natural environment of England in a better state than it inherited. To achieve so much means taking action across sectors rather than treating environmental

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2 Green infrastructure: connected and multifunctional landscapes, Landscape Institute, 2009
3 www.naturalengland.org.uk/ourwork/planningtransportlocalgov/greeninfrastructure/default.aspx
4 www.forestry.gov.uk/forestry/INFD-79EK7F
concerns in isolation. It requires us all to put the value of nature at the heart of our decision-making – in Government, local communities and businesses.”

– paragraph 2, page 3, NEWP

“Through reforms of the planning system, we will take a strategic approach to planning for nature within and across local areas. This approach will guide development to the best locations, encourage greener design and enable development to enhance natural networks. We will retain the protection and improvement of the natural environment as core objectives of the planning system.” – paragraph 6, page 3, NEWP

None of the approaches outlined in NEWP is reflected in the draft NPPF. The draft NPPF does not explain how the environmental, social and economic objectives for the planning system relate to each other. Moreover, CLG has announced that current national guidance contained in Planning Policy Statements, including PPS9: Biodiversity and Geological Conservation, will be abolished. It is difficult to understand how the vision outlined above can be translated into action with an approach to planning which favours economic growth over the natural environment. The draft NPPF does not appear to take account of any of the objectives set out in NEWP, particularly in relation to placing nature at the heart of economic decision-making. Instead, it treats economic growth and environmental protection as separate goals rather than accepting that they are interlocking aspects of the same process.

Unless and until development proposals at every level are first assessed against their potential impact on natural systems and resources, and then only progressed if and when positive environmental gains have been fully integrated into the proposals, the perceived need for economic development will continue to overrule cumulative harm in terms of environmental degradation.

The LI supports the NEWP commitment to integrate green infrastructure into the planning system. The only way to achieve this is to ensure that it is fully integrated into the Government's planning reforms. Green infrastructure would then provide an ideal mechanism for ensuring that people were reconnected with nature and a green economy could thrive.

The LI also supports the embedding of European Landscape Convention principles into planning reforms. The European Landscape Convention (ELC) is the first international convention to focus specifically on landscape, and is dedicated exclusively to the protection, management and planning of all landscapes in Europe. The ELC became binding from 1 March 2007. The convention highlights the need to recognise landscape in law, to develop landscape policies dedicated to the protection, management and creation of
landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. The treaty has a useful role to play in reconciling human and natural systems, and integration of these in the planning design and management of landscapes. It offers a ‘democratisation of landscape’, which is in line with current thinking on localism, and promotes the aims of protecting special landscapes and managing and enhancing ‘all landscape everywhere’.

3.2. Local government

Green infrastructure should be at the heart of local plans. It is the LI’s view that local plans should be required to include green infrastructure strategies and the Duty to Co-operate should be extended specifically to include all forms of infrastructure including green infrastructure. The LI will in October publish Local Green Infrastructure: helping communities make the most of their landscape. This guide explains the ways in which green infrastructure thinking can be incorporated into the process of developing local plans.

3.3. Actions by civil society

Encouraging neighbourhoods to make the most of their landscape is at the heart of the LI’s work on green infrastructure. The LI welcomes the NEWP commitment to establish Local Nature Partnerships and Nature Improvement Areas. However, if these are to succeed, there will be an urgent need for ‘awareness-raising’ within local communities in order for people who become involved in local decision-making and neighbourhood planning to better understand the value of landscape and wildlife.

4. What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

A considerable amount of recent research is available, for example, the Natural Economy NW Partnership⁵, Community Forest Partnerships⁶ and Land Use Futures⁷ which provide an extremely important research and evidence base that seems to have been forgotten. The realignment of the emerging NPPF could be used to require all local planning authorities to embed the value of nature into planning policies and to require decision makers to apply the lessons of the NEWP.

⁵ http://www.naturaleconomynorthwest.co.uk/about.php
Local authorities should be required to embed natural environment protection and enhancement into their current and future local plans – and encouraged to call on the expertise of landscape architects in order to do so effectively. This could include the production of GI maps using GIS, and the development of GI strategies both within and across local authority boundaries. Defra could consider safeguarding recent national guidance in PPS9: Biodiversity and Geological Conservation, and other relevant planning policy statements, before these are abolished by CLG. The LI considers that it is vitally important that these national guidelines should not be lost.

5. What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment and make the most effective proposals for re-engagement

NEWP makes a considerable number of commitments to working with the EU to address environmental concerns internationally. Some of those resources could be channelled into the definition and promotion of sustainable economic growth in the UK, with extensive dissemination of current evidence, awareness raising and training across all Government departments, local authorities, statutory bodies, companies, investors and banks. LI, together with other organisations such as Natural England, TCPA, Design Council/CABE, and Community Forest partnerships would be well placed to assist in this role. Then Defra and CLG could set up a relatively low-cost system of awards, rewards, recognition and appreciation for those individuals and/or bodies who succeed in translating the value of ecosystem services into expenditure that directly benefits the natural environment.

The Natural Environment White Paper offers an inspiring opportunity to create new partnerships to provide ‘awareness raising’ and ‘capacity building’ within local communities, and to encourage local engagement in landscape planning. The LI considers that the Green Infrastructure Partnership would be an excellent starting point for building greater public awareness of, and active support for, coherent and resilient ecological networks and multi-functional landscapes.

26 September 2011
Written evidence submitted by The British Ecological Society (NEWP 06)

About the British Ecological Society

The British Ecological Society (BES) is the oldest learned ecological society in the world, due to celebrate its centenary in 2013. Our members, numbering close to 4,000, are drawn from the full spectrum of ecological research; reflected in the specialist groups within the Society on a variety of ecological research streams, including forest, freshwater, tropical, agricultural, aquatic and conservation ecology. For further information about the Society’s work, visit our website, at www.britishecologicalsociety.org.

Response

1 The BES welcomes:

1.1 The stated aims, outlined in the introduction, to create a resilient ecological network across England; to move from ‘net loss’ of biodiversity to ‘net gain’; to support healthy, well-functioning ecosystems and coherent ecological networks.

1.2 The announcement to establish 12 Nature Improvement Areas (NIAs), building on the recommendations of the Lawton Review of England’s protected area network, along with funding of £7.5 million to support a national competition to select sites.

1.3 Plans to establish Local Nature Partnerships, working across administrative boundaries to take landscape-scale action for issues including biodiversity conservation and ecosystem services, supported by an initial fund of £1 million.

1.4 Plans for the full inclusion of natural capital in national accounts, and the establishment of a Natural Capital Committee, reporting to the Economic Affairs Cabinet Committee in HM Treasury. This should include ecologists alongside economists.

1.5 Establishment of the Ecosystems Knowledge Network, run by an independent organisation and sharing learning and good practice with respect to ecosystem management. The BES is a partner in a similar project: the Natural Capital Initiative.

2 The following should be improved:

2.1 Detail about how the Government’s planning reforms will ‘enable development to enhance natural networks’ (p3). The National Planning Policy Framework must show how the planning system will deliver on the commitments outlined in the Paper. We remain concerned that the abolition of Regional Spatial Strategies and the emphasis on neighbourhood-level decisions will prevent landscape-scale planning, whilst the presumption towards sustainable development (p21) will result in the environment receiving little attention.

3 Omissions to be rectified are:

3.1 The 12 NIAs will be ‘initial’ sites: additional information is needed regarding the Government’s longer-term ambitions for the development and roll-out of NIAs across England. A long-term strategy to leverage the £0.6 – 1.1 billion annual costs of establishing a coherent and resilient ecological network,

1 http://www.naturalcapitalinitiative.org.uk.
estimated by the Lawton Review, is also needed.

3.2 The management objectives for NIAs are not detailed in the White Paper. Clarity is needed on whether these will be as envisaged in the Lawton Review for Ecological Restoration Zones; areas where significant enhancement of the ecological network over a large scale would be achieved by enlarging and enhancing existing wildlife sites, improving the ecological connectivity between sites and/or creating new wildlife sites. Underpinning ecosystem services would be restored and pressure upon wildlife sites reduced by better integrating the surrounding land-use with the management of the ecological network.

3.3 Recognition of the importance of soils more broadly, not just peatlands, which make up a small percentage of England’s landscape. Greater soil science research is needed to provide the data necessary to underpin catchment-level decision-making.

3.4 The current review of all 278 environmental regulations as part of the Red Tape Challenge seems incompatible with the Government’s ambition to protect and improve the natural environment. We would welcome assurance from Government that a proportionate and evidence-based approach will be taken to reviewing environmental regulation, alongside a formal period of consultation with relevant stakeholders.

Suggestions for inclusion within the terms of reference of a future inquiry

1 The Natural Environment White Paper focuses on England only. How will the Government work with counterparts in Wales, Scotland and Northern Ireland to ensure a joined-up approach to management of the natural environment? This should include consideration of how England can benefit from lessons learned in the devolved administrations – for example, the implementation of the Natural Environment Framework in Wales.

2 A survey by the Association of Local Government Ecologists (ALGE) suggests that 46% of ‘Green Space’ departments in Local Authorities, responsible for biodiversity, will face budget reductions proportionately greater than that for the organisation as a whole. This will affect Local Environment Record Centres, Local Biodiversity Partnerships, management of Local Nature Reserves and wildlife sites, and local biodiversity opportunity mapping (vital for strategic mapping with respect to biodiversity offsetting). Compounded by budget reductions at Natural England, how will local authorities and local citizens have access to relevant expertise to enable the environment to be taken into account in planning decisions?

3 How will the results of the UK National Ecosystem Assessment be communicated to local authorities and civil society to enable decisions to be taken with regard to the value of natural capital?

20 June 2011
Plantlife is the organisation speaking up for the nation’s wild plants and fungi. We work hard to protect wild plants and fungi on the ground and to build understanding of the vital role they play in everyone’s lives.

Issues that the Committee may wish to include in terms of reference for a possible future Select Committee inquiry into detailed aspects of the White Paper are in bold text.

1. **Plantlife welcomes**:

   1.1. Using the National Ecosystem Assessment as evidence for decision making. The NEA showed that plants and fungi are the fundamental building blocks of the natural environment.

   1.2. The creation of Nature Improvement Areas. Government must ensure that **meeting the needs of plants/fungi is the cornerstone of each NIA**.

   1.3. Commitments 22, 25, 35, 36, 61, 76.

2. **Improvements can be made through**:

   2.1. **Firmer commitments to protect rare and threatened wildlife.** Section 2.9 includes several quantified aims which the England Biodiversity Strategy must further commit to and extend to vulnerable species. The EBS must also be cross-government/department policy, otherwise Government is unlikely to meet its international commitment to halt biodiversity loss by 2020.

   2.2. Clearer demonstration of how departments other than Defra will be committed to delivering the NEWP, including accountability and review.

   2.3. Clearer demonstration that planning reform and the Localism Bill will not compromise the NEWP’s ambitions and commitments. We are concerned that the Localism Bill in its current form (whereby "local financial considerations" can be a material factor in planning decisions) is not compatible with NEWP ambitions.

   2.4. A commitment to **improve the Biodiversity Duty on public bodies.** Although the NEWP talks of providing new tools and guidance for public bodies, there is currently no commitment to do this.

   2.5. A commitment to **review the voluntary approach in biodiversity offsetting** and consider regulation for developers. Also, recognition that the existence of an offsets scheme must not be abused as a ‘licence to trash’.

   2.6. Clearer demonstration of **how local action will integrate national/strategic biodiversity ambitions** and a commitment to provide a national framework of information and advice to support Local Nature Partnerships.
3. **Plantlife believes these omissions should be rectified by Government:**

3.1. Failure to recognise the *significance of the Global Strategy for Plant Conservation* (GSPC). An amended and updated GSPC was endorsed by Government at Nagoya (CBD COP10) in order to halt the continuing loss of plant diversity. Yet flowering plants and ferns are at the bottom of the Government’s league table for features in favourable condition on SSSIs and 1 in 5 wild flowers in Britain are threatened with extinction. Failure to embed the GSPC in the NEWP is a serious oversight.

3.2. Failure to *set a compulsory deadline to halt the use of peat*. It has already been shown that a voluntary approach to this issue does not provide the right incentive to achieve good results: the previous voluntary target set by Government on peat use reduction was missed.

3.3. Failure to commit to measures to help reduce/prevent damage to the environment from invasive non-native species. Three and a half years have passed since Government consulted on a *ban on sale of the most invasive species*, a method Plantlife believes is a prerequisite to protecting our environment from this major and unnecessary threat.

4. **Plantlife also supports the Wildlife and Countryside Link response to the EFRA Committee.**

*20 June 2011*
Further written evidence submitted by Plantlife (NEWP 07A)

Plantlife is the organisation speaking up for the nation’s wild plants and fungi. We work hard to protect wild plants and fungi on the ground and to build understanding of the vital role they play in everyone’s lives.

In addition to our response below, Plantlife also endorses the submission by Wildlife & Countryside Link.

Q1 What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

1. The National Ecosystem Assessment showed that plants and fungi are the fundamental building blocks of the natural environment – the very roots of a green economy. Yet flowering plants and ferns remain at the bottom of the Government’s league table for features in favourable condition on Sites of Special Scientific Interest and 1 in 5 wild flowers in Britain are threatened with extinction. An amended and updated Global Strategy for Plant Conservation (GSPC) was endorsed by Government at Nagoya (CBD COP10) in order to halt the continuing loss of plant diversity, but the White Paper made no mention of the Strategy, nor of Government’s commitment to delivering it. Recognition across Government departments of the GSPC targets and a detailed plan for their cross department delivery would significantly increase the likelihood of the White Paper succeeding.

2. As biodiversity underpins ecosystem services (and so forms the basis for a green economy), firmer commitments are required in order to protect rare and threatened wildlife. ‘Biodiversity 2020’ must be embedded as a cross-government/department policy rather than become Defra’s responsibility. The Biodiversity Duty on local authorities must be strengthened. Although the NEWP talks of providing new tools and guidance for public bodies, there is currently no commitment to do this. Furthermore, we consider the Red Tape Challenge, which includes all 278 pieces of environmental legislation and regulations, to be a significant threat to the delivery of the White Paper. The Challenge process is neither transparent nor does it appear to be evidence-based. Government must not undo good legislation, such as the Wildlife and Countryside Act, and, indeed, should seek to use more of the powers that exist through such legislation in order to protect wildlife and the broader environment (including, for example, the power to ban the sale of invasive plant species).

3. Clearer demonstration that planning reform and the Localism Bill will not compromise the NEWP’s ambitions and commitments is needed. In its current form (whereby "local financial considerations" can be a material factor in planning decisions), the Localism Bill is not compatible with NEWP ambitions.
Q2 Will the institutional framework outlined for delivering the proposals (in particular NIAs and LNPs) be effective? Does the proposed Natural Capital Committee have sufficient powers?

4. The institutional framework for delivering the ambitions of the NEWP remains unclear and unsatisfactory, especially for biodiversity commitments (NEWP paragraph 2.9 and related Biodiversity 2020 strategy). The delivery of action to recovery our declining species and threatened habitats was previously well organised with identified national leads on species and habitats (Lead Partner organisations) responsible for developing programmes, projects and partnerships. Criticisms of the past process would be: i) a lack of integration between habitat conservation and the needs of species (it is more efficient and effective to restore/create habitats in those places that will also help recover threatened species); ii) no system to link national, regional and local biodiversity plans (local plans often failed to identify action for nationally important species in their patch); iii) poor communication channels for the needs of species through to policy and decision makers (barriers to progress and proposed solutions identified in reporting rounds were rarely addressed at Government level); and iv) inadequate action tackling the threats to the health of the wider countryside (e.g. atmospheric pollution, release of non-native invasive species).

5. Nature Improvement Areas (NIA) provide a good opportunity to integrate the needs of national and locally important species into habitat and landscape initiatives (this integration should be a key criteria in determining successful applications). However, to be effective the NIAs need to be supported by a national framework of wildlife information and expertise (from sources including specialist NGOs and natural history societies), which would help determine/steer how local ambitions contribute to national needs (NERC Section 41 priority species and habitats). The coordination and communication of nationally held wildlife advice to either NIAs or Local Nature Partnerships (LNP) is yet to be adequately addressed in any of the Government’s policies and strategies on the natural environment.

6. Equally it is unclear how positive results or barriers to making significant change for our most vulnerable wildlife, or natural environment more generally, are to be channelled from NIAs or LNPs as evidence on which Government agencies and departments can make policy or legislative decisions.

Q3 What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

7. The National Ecosystem Assessment demonstrates that plants and fungi deliver more value to the UK than any other wildlife groups, with land plants and fungi playing a role in underpinning all provisioning and regulating services such as water
supply and climate regulation. Plants and fungi are fundamental to the supporting services (soil formation, nutrient cycling, the water cycle, primary production) too. Hence embedding the true value of plants and fungi in all decision-making is of primary importance.

8. However, in the effort to avoid double counting when valuing ecosystem services, it is the end products of benefit to human welfare which are being valued, rather than the processes which deliver those benefits (Fisher et al, 2008). Statements such as ‘Supporting services do not provide direct benefits to people ...’ (Defra, 2011) are likely to be detrimental in the effort to fully embed the value of plants and fungi into policy delivery as it obscures the role of biodiversity from both public and government consciousness.

9. Therefore, demonstrating the links between the delivery of ecosystem services and plant and fungi diversity is critical to helping embed the value of nature into policy delivery. Research in the emerging field of biodiversity and ecosystem functioning has demonstrated that biodiversity is central to the delivery of ecosystem services. For example, Cardinale et al (2011) state:

‘We now have the theoretical foundations and sufficiently large data sets that we can say with certainty that biodiversity does indeed regulate several processes that are essential to the functioning of ecosystems and that many of these functions are important for humanity.’

and Isbell et al (2011):

‘Our results indicate that even more species will be needed to maintain ecosystem functioning and services than previously suggested ... although species may appear functionally redundant when one function is considered under one set of environmental conditions, many species are needed to maintain multiple functions at multiple times and places in a changing world. ... Furthermore, note that declines in local diversity which are far more common than global extinctions, will also decrease ecosystem functioning and services within some contexts.’

10. The NERC BESS research programme into the links between biodiversity and ecosystem service provision has the potential to help Government achieve the ambitions of the NEWP. The focus of research undertaken through the BESS programme should be on plants and fungi as these are the wildlife groups whose value is both greatest and currently least safeguarded. For example, the recent Defra report (June 2011) on Benefits of SSSIs (how the wildlife therein delivers ecosystem services) makes just two mentions of fungi in 111 pages. The report fails to establish
that the presence of plant/fungi species on a SSSI does not mean there is active management to maintain/support/protect those species. If Defra are still failing to grasp the need to do more to protect plants and fungi and their diversity, then it is unlikely that other government departments are embedding the true value of nature into their planning and decision-making.

11. By avoiding double counting, major assumptions are made that the current use of ecosystem services is sustainable. Clearly this is not the case in many situations. More must be done to promote true sustainability in the decision-making processes of all local government and national government departments, and to demonstrate the long-term implications for ecosystem service delivery based on current patterns of resource use (for example, intensive farming).

12. In determining safe minimum standards and tipping points in ecosystem services, policy makers must not overlook the fact that species have intrinsic value and are, in themselves, an ecosystem service.

Q6 Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

13. We welcome a number of the initiatives outlined in the White Paper, including points 4.21 and 4.23 and fully support the ambition to re-engage people with the natural environment. However, we are not convinced that the White Paper sets out an accurate assessment of all the barriers to public engagement, nor that its re-engagement proposals will be effective. In some instances, for example 4.27, details about how ambitions are to be achieved is completely lacking. Similarly, the assumption that ‘thousands of local volunteers’ can be recruited and will lead outdoor learning activities to the same standard and quality as trained and experienced professionals is unrealistic.

14. The White Paper seems to focus on safety fears / fear of litigation as the main barrier to school engagement with the natural environment. Whilst we welcome the ambition to overcome this particular obstacle, this is only one of many barriers. Cultural change is required in schools/teacher training institutions/local education authorities in order to make the natural environment an extension of the classroom.
15. Whilst we welcome the statement that ‘Schools should be able to teach outdoors when they wish to do so…’ we do not believe that this goes far enough. Schools need to be encouraged, supported and enabled to take learning outside of the classroom.

16. The pupil premium can be used in a number of ways – it is not specifically intended to promote access to the natural environment and therefore it cannot be assumed that this will be used as part of a plan of re-engagement with the natural environment. Whilst financial support for schools is welcome - especially if it enables more children to access the natural environment - it must be recognised that it is not just children from deprived backgrounds who do not spend time in the natural environment.

17. One off interventions are important but are unlikely to lead to the re-engagement that Government seeks. One off trips to nature reserves or other sites are not enough to change people’s behaviour, outlook, prospects or attainment. More emphasis should be placed on local green spaces that are more readily accessible by communities than nature reserves or sites provided through the Natural Connections initiative. Regular contact with the natural environment builds confidence, knowledge and understanding and this is more achievable through local green spaces.

References


Defra (2011) Benefits of Sites of Special Scientific Interest, Prepared by GHK Consulting Ltd, in conjunction with Dr Mike Christie of Aberystwyth University, ADAS, IEEP, Rick Minter and the Research Box.


26 September 2011
The Food Ethics Council (FEC) is a charity that provides independent advice on the ethics of food and farming. Our aim is to create a food system that is fair and healthy for people and the environment. In pursuit of this aim we:

- Research and analyse ethical issues
- Mediate between stakeholders
- Develop tools for ethical decision making
- Act as honest brokers in policy and public debate

The 14 members of the FEC are leaders in their relevant fields, and appointed as individuals. They bring a range of expertise to our work, from academic research through to practical knowledge of farming, business and policy.

**Summary**

2. The Food Ethics Council welcomes the government’s commitment to protecting our natural environment, but we are concerned by the white paper’s emphasis on nature’s economic value, and its faith in the compatibility between economic growth and protecting the environment.

**Environmental economics**

3. While pricing up ‘ecosystem services’ promises some opportunities to ensure that natural resources are better valued and protected within the economy, the new markets this creates can also bring additional pressures to bear on the environment.

4. Instead of restraining business, biodiversity offsets (or ecosystem services markets) can instead loosen regulatory constraints. For example, one of the perverse effects of the EU Emissions Trading Scheme has been to give the biggest polluting corporations enough ‘free CO2 pollution rights’ to cover all – and in some cases more than all – of their current pollution output. We have also seen a proliferation of CO2 reduction ‘equivalents’, whereby companies in the global North can continue to produce environmentally damaging emissions as long as they purchase equivalent reductions from companies operating in the South.

5. At best, applying economic thinking to the services nature provides gives us pause to think about how important nature is to humanity. But at worst it perpetuates the dangerous conceit that the markets will respect nature because of the value we’ve placed on it. Government policy intended to protect the environment must acknowledge the intrinsic value as well as the ‘usefulness’ of nature.

**Is economic growth compatible with protecting the natural environment?**

6. The UK government operates within a global economy committed to driving growth on a planet with biophysical limits. The Sustainable Development Commission’s
report *Prosperity without Growth*? points out that “In the last quarter of a century, as the global economy has doubled in size, increases in consumption have caused the degradation of an estimated 60% of the world’s ecosystems.”

7. The Government’s approach is premised on ‘decoupling’ economic growth from the consumption of natural resources. They believe it is possible to continue to achieve growth while simultaneously reducing resource impacts through technological and other innovation.

8. The problem with this approach is that the available evidence suggests it cannot be done. Resource impacts have continued to rise in recent years despite innovation; and positive assessments of the potential for decoupling underestimate the scale of the resource impact reductions that we need to achieve.

*20 June 2011*
Written evidence submitted by the Centre for Ecology & Hydrology (NEWP 09)

1. The Centre for Ecology & Hydrology (CEH), a research centre of the Natural Environment Research Council, welcomes the white paper. The paper shows a most appropriate commitment to the protection and enhancement of our environment and the critical role it plays in maintaining a healthy society by supporting our quality of life and in underpinning wealth creation.

2. Particularly we welcome Commitments (number)
   2.1. To build on the National Ecosystem Assessment to provide scientific evidence and interpretation to support policy and implementation of an Ecosystems Approach (1).
   2.2. The need to continue to undertake statistically robust long term monitoring and research at appropriate spatial and temporal scales to provide evidence to inform policies, and identify emergent risks and opportunities at a national level. We hope to see that initiatives described in the white paper such as the success of the offsetting pilot (15) and the reform of the planning system (14) will be underpinned with scientific evidence and research.
   2.3. To more joined up information sharing thus creating better understanding and two-way knowledge exchange (24).
   2.4. The need for more research in soils; we hope that this will lead to a co-ordinated Soils Survey being established to monitor the stock, quality and vulnerability of UK soils from bedrock to surface (25).
   2.5. To explore use of environmental data holdings for the purposes of supporting the green economy (36 & 37). Environmental datasets need to be accessible, understandable and comprehensive. CEH has provided the largest number of environmental datasets that are INSPIRE ready on the data.gov.uk site though its Information Gateway (https://gateway.ceh.ac.uk/) which has been held up as an example of good practice to meet INSPIRE requirements by the European Joint Research Centre (82).

3. Omissions
   3.1. We welcome the aim to enhance the involvement of and value that can be gained from citizen science (76). CEH has considerable experience in this area e.g. running the Biological Records Centre and the National Biodiversity Network (holding > 15,000,000 records from 80 citizen recording schemes) and other citizen schemes monitoring pesticides, greenhouse gases and seabird populations. Based on this experience we believe that an omission is the explicit recognition that citizen science is only effective when sound national scientific standards are set, the survey design is robust and the monitoring and data collection is managed to high QA standards through appropriate coordination at a national level. If this does not happen the data gathering, although potentially great in quantity, will not be fit for the purpose of providing data for interpretation to provide evidence to measure environmental change and identify the causes.

   3.2. There is a omission regarding the need to fill knowledge gaps, perhaps identified through local partnerships, through ‘more joined up’ monitoring, data and modelling at a national level ‘to enhance our understanding of the state of ecosystem services’ (88) and the need to exchange the subsequent insights to the local partnerships.

20 June 2011
Written evidence submitted by the Royal Society for the Protection of Birds (RSPB) (NEWP 10)

1.0 The Royal Society for the Protection of Birds (the RSPB) is the charity that takes action for wild birds and the environment. We are the largest wildlife conservation organisation in Europe with over one million members.

1.1 The RSPB is pleased that the coalition government has produced a white paper on nature so early in its term; thereby demonstrating their commitment to England’s natural environment.

2.0 The RSPB welcomes:

2.1 The scale of ambition outlined in the white paper. We are impressed by the government’s ambitions, and the aim that: ‘The Government wants this to be the first generation to leave the natural environment in a better state than it inherited.’

2.2 The commitment to measurable outcomes and to reporting on these. We strongly believe that any meaningful strategy must contain measurable outcomes against which progress can be tracked. We are pleased to see the outcomes set out (2.9, p17), although we are concerned to see this does not include an outcome related to vulnerable species. We are also pleased to see the commitment to produce indicators, including biological, by spring 2012 (5.6, p66).

2.3 Actions to ensure the value of nature is given proper consideration in decision-making. Following the powerful evidence base established through the National Ecosystem Assessment, we are pleased to see a range of commitments to put this into practice. Of these, the new independent Natural Capital Committee, reporting to the Economics Affairs Cabinet and chaired by the Chancellor, is one of the most promising. However, all of these actions will need the ongoing commitment of key departments and a cultural shift if they are to achieve the desired outcomes.

3.0 The RSPB has concerns that:

3.1 There is no convincing funding strategy. Whilst we appreciate the current economic difficulties, the ambitions set out in the white paper will not be met without significant investment. It is crucial that a long-term strategy considering innovative funding sources is established, and existing funding is made to work harder.

3.2 Most of the mechanisms recommended are voluntary, and untested. Past experience suggests that government will need to use a combination of legislation, enforcement, incentives and voluntary approaches if the ambitions are to be realised. We welcome the commitment to pilot many of the ideas first, and particularly the government’s commitment to review existing voluntary initiatives and take action if they are not working (2.48, p24).

3.3 There is no clear relationship between local action and national priorities. Many problems are best solved at a local level, but national priorities will not always
be met without a strong relationship between local partners and central structures. If we are to meet our international commitments for 2020, this must be resolved.

3.4 **There are no meaningful commitments to the UK Overseas Territories.** Given that this is where the bulk of the UK’s responsibility for preventing species extinctions lies, it is astonishing that the white paper fails to make the stretching commitments required if the UK is to meet its international obligations.

20 June 2011
Further written evidence from the Royal Society for the Protection of Birds (RSPB)  
(NEWP 10A)

Summary

1. In this submission of evidence, the RSPB makes the following main points:
   a) The RSPB welcomes the White Paper, but we believe that there is much work to do across government if we are to deliver its ambitions.
   b) There is huge pressure on the new voluntary initiatives to deliver, and much more needs to be done to support them.
   c) The planning system has a crucial role to play in delivering the ambitions of the White Paper, and changes are required to the proposed reforms to achieve this.
   d) More detail and assurance is needed around embedding the value of natural goods and services in decision-making across government.
   e) While the Department for Education has already taken some welcome steps towards reconnecting children with nature, further elements must be implemented across government.

Introduction

2. We welcome the bold ambitions in the White Paper, although we have concerns about the lack of an outcome related to species.

3. Our experience of nature conservation leads us to believe that there are broadly four types of mechanism that could deliver these ambitions. These are: i) regulation, ii) incentives or funding, iii) market-based approaches, and iv) voluntary action.

4. The Government is reluctant to use the first two of these for environmental ends. The White Paper therefore broadly focuses on creating markets, and use of voluntary initiatives. Since the market mechanisms will take time to reap benefits, this means there is significant pressure on the new voluntary initiatives to deliver.

Responsibility for the ambitions of the NEWP

5. The White Paper is the product of a welcome process of cross-government working. Following its launch, we believe that government needs to clarify where ultimate responsibility now lies, and how departments beyond Defra will be held to account.

6. We warmly welcome the measurable ambitions established in the White Paper (paragraph 2.9), although we were disappointed not to see an ambition regarding species of conservation concern. We are concerned that the ambition that followed in the England Biodiversity Strategy is vague and un-ambitious; we should be aiming to improve the
prospects of all priority species in England by 2020. Achieving this will require a re-invigorated species recovery programme and greater efforts to integrate the needs of priority species into wider habitat and landscape initiatives.

The funding gap

7. The Lawton review\(^1\) estimated that between £600M and £1.1bn annually was needed to establish a coherent and resilient ecological network in England. At the most recent estimate in 2010, there was a £273M shortfall in funding needed to meet UKBAP targets.\(^2\) Despite this, Defra received real cuts of around 30%, the second largest of any government department in the 2010 Spending Review. With a nominal budget of £2.2bn scheduled for 2014/15, compared to £2.9bn in 2010/11 when this shortfall was identified, it is unlikely that the government is allocating sufficient resources to meet the needs of our natural environment.

1. In its report ‘Financing nature in an age of austerity’ the RSPB recommended possible new mechanisms for generating finance for nature conservation without using the public purse\(^3\). Notable amongst these suggestions were a biodiversity offsets scheme, and a levy on peat products used in horticulture. In both these areas, the Government’s reluctance to regulate means that voluntary measures are being introduced which will not ensure sufficient action from the private sector.

2. Much of the existing funding comes from agri-environment. Already insufficient to meet existing objectives, let alone meet any new demands, it is concerning that it is under so much pressure through the current CAP reforms. For example, the CAP budget for 2014-2020 will be c.8% less than at present and could face further cuts as part of EU Budget negotiations, and draft CAP legislative proposals have suggested worrying changes which will put further pressure on pillar II.

The new voluntary initiatives

3. The RSPB warmly welcomes LNPs and NIAs and is committed to working with government and other partners to make them a success.

4. However, given the pressure on these to deliver, we have been surprised at the haste with which Defra has rolled them out, and the lack of supportive structures or guidance required to ensure they succeed.

5. More needs to be done if these initiatives are to make a significant contribution to the ambitions of the White Paper:

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3 Comerford et. al., 2010, *Financing Nature in an Age of Austerity*, RSPB.
There was no image provided, but the text is as follows:

a) Their success criteria must be, in part, defined nationally. Defra needs to show how the delivery achieved by LNPs and NIAs will contribute to the measurable ambitions of the NEWP. We recommend that Defra provide a national framework, showing the species and habitats that need to be delivered within a particular area, and tie advice from Natural England, and the monitoring of delivery, to this framework.

b) Defra should have a clear role in championing LNPs within government and must commit to removing obstacles to their delivery, wherever possible. These roles should be clarified in a public statement.

c) CLG should advise Local Enterprise Partnerships (LEPs) that they should nominate a representative to sit on the LNPs, and vice versa. The wording in the White Paper ‘we would encourage LEPs and LNPs to work together’ is inadequate.

d) Government should clarify to local authorities that meeting their responsibilities under the biodiversity duty includes supporting habitat restoration and recreation, and working with LNPs.

e) The draft NPPF must be amended to better support LNPs and NIAs (see below).

6. The White Paper also introduced a new voluntary initiative for the reduction of peat use in horticulture, with which the RSPB has serious concerns. Given the failure of the previous voluntary approach to deliver against its own targets, the RSPB, and many others, believe a regulatory approach is the only way forward.

7. Given the pressure on voluntary initiatives, we welcome the commitment in paragraph 2.48 to use the review in 2012 of the Campaign for the Farmed Environment and the Greenhouse Gas Action Plan ‘to assess more generally the effectiveness of this kind of voluntary industry-wide approach’. We recommend that this review be extended to LNPs and NIAs, and also the voluntary approach to peat reduction (bringing this forward from 2015).

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4 For example, the increase of 200,000ha of priority habitat and the outcome for priority species
5 For example, compared to the target of peat comprising 10% of the market by 2020, it actually comprised 42%
6 For example, B&Q, Homebase, Scotts Miracle-Gro and Sinclair Horticulture, who between supply more than 70% of the peat in the UK marketplace, co-signed a letter together with the RSPB, the National Trust, the Plantlife, the Wildlife Trusts and others to the Minister, requesting an end to the voluntary approach to peat replacement.
Implementing NEWP and planning reforms

8. The RSPB has serious concerns about the draft NPPF as it stands. We fear it will take us further away from meeting the ambitions of the NEWP, rather than closer toward them as hoped.

9. The RSPB has obtained legal advice that the draft NPPF would undoubtedly lessen protection for SSSIs and other wildlife designations not protected by European law. The presumption would make it more difficult to refuse an application that would damage such sites, because of its requirement of proof that ‘adverse impacts of allowing development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole’ (paragraph 14).

10. Both NIAs and LNPs need an explicit underpinning in NPPF if they are to succeed. We recommend this is incorporated to the welcome policies in paragraph 168.

11. The NPPF should require local authorities to establish a robust evidence base for the natural environment. This should be clearly set out in the section ‘Using a proportionate evidence base’ (p8-12), just as it is for housing and business requirements.

12. Effective planning for the natural environment often needs to take place at landscape scales that do not follow administrative boundaries, therefore requiring effective joint-working by adjoining local authorities. The NPPF and the duty to cooperate in the Localism Bill do not yet provide a sufficient basis for larger than local strategic planning.

Embedding the value of nature in decision-making

13. The RSPB welcomes:
   a. the establishment of a Natural Capital Committee (NCC), to advise the Chancellor on the sustainable use of natural capital across the UK,
   b. the commitment to include measures of natural capital into the UK’s environmental accounts, and amend the Treasury Green Book to include guidance on monetary and non-monetary valuation, and
   c. the further funding made available for research around the valuation of natural services.

14. More clarity is needed about how the findings and advice from the NCC will input into policy and government process, for example in setting new UK targets for sustainable resource use and pollution levels, or the use of green indicators alongside GDP to form a more sustainable measure of economic prosperity.

15. There is a significant disconnect between the findings of the recent UKNEA and current economic policy in the UK. “Enabling the transition to a Green Economy”, the Government’s green economy roadmap recently produced by Defra, BIS and DECC,
makes no mention of the NEA, or how environmental goods and services other than carbon may fit into the Government’s vision for a sustainable growth. Similarly, BIS and HMT’s “Plan for Growth” and the Local Growth White Paper fail to recognise that ‘green’ is not synonymous with ‘carbon’, making no mention of broader natural capital and the services it provides.

16. “Green GDP” measures are gaining increasing favour worldwide, including within developing countries such as China and India. The United Nations Conference on Sustainable Development in 2012 is likely to promote further global thinking on measuring sustainable economic growth. To be a global leader in this arena, the UK must examine practical ways to incorporate its green accounts firmly into its economic strategy.

17. The RSPB supports the proposed actions relating to Payments for Ecosystem Service (PES) schemes. However, the limits to such methods must be acknowledged. Due to the ‘public good’ nature of much natural capital, identifying discrete private providers and beneficiaries will not be possible for many ecosystem services. Without government intervention, there will always be some level of market failure regarding environmental damages, where regulation and legislation will be required to deliver the best results for nature, and for our long-term prosperity.

Reconnecting people with nature

18. The RSPB welcomes the government’s ambition to strengthen people’s connection to nature. A crucial element of this is ensuring every child is given opportunities to experience and learn about the natural environment, and grow to care for and protect it.

19. The Department for Education has already taken some necessary steps to achieve this, such as significantly reducing the health and safety bureaucracy for teachers associated with outdoor learning. The RSPB believes that further important elements identified in the White Paper must also be fully implemented by the Department for Education and embedded in practice, including:

   a. Making available evidence and information about the effectiveness of learning outside the classroom, for schools deciding how to allocate pupil premium funding (NEWP paragraph 4.15; Schools White Paper paragraph 8.7).

   b. Ensuring that the new national curriculum across all Key Stages (1-4): for science/biology, includes ecology and biodiversity; for geography, includes the human impact on the environment and conservation; and that both subjects are underpinned with regular field work (paragraph 4.16).

20. Further aspects linked to the White Paper’s proposals, but not specifically identified within, also require cross-government action:
a. Ensuring children and young people are closely involved (through schools and youth settings) in all activities relating to the new Local Green Space designation (NEWP paragraph 4.23; Public Health White Paper paragraph 3.36; NPPF paragraphs 128-132).

b. Establishing a baseline of children’s current connection to nature, to monitor and evaluate the White Paper’s ambitions (and which should go beyond simply measuring the frequency and number of visits by children to the countryside (paragraph 4.26)).

21. The RSPB also has concerns regarding the proposals for people of all ages taking part in environmental volunteering. While reference is made to the Giving White Paper (paragraph 4.40), its recommendations must be coherently linked to the Natural Environment White Paper to ensure the government accurately assesses the barriers to public engagement with the natural environment. A particular concern is how resource implications on organisations are to be managed7 as capacity is built for environmental volunteering (Giving White Paper, p63).

26 September 2011

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7 For example, the time and costs involved in providing professionally managed, appropriate and rewarding volunteering opportunities.
Written evidence submitted by the Woodland Trust (NEWP 11)

1. Summary

1.1 The Woodland Trust welcomes the vision and aspirations set out. In particular the recognition of trees and woods as cost-effective vehicles for delivery of ecosystem services, building on the clear findings of the National Ecosystem Assessment. The NEWP also acknowledges the Read Report’s conclusions on the role of forestry in combating climate change. Implementation of the latter could mean planting around 10,000ha of woodland per year in England.

1.2 What is lacking however, having set out the Government’s ambition for ‘a major increase in woodland cover’, is a target for this. All other parts of the UK have a target and the NEA noted that the UK Forest Carbon sink may soon decline because of dwindling planting figures in what is already one of the least wooded countries in Europe.

1.3 The Independent Panel on Forestry can provide important advice on how we tackle barriers to woodland creation and protection but we believe Government needs to be providing leadership and a clearer map for the journey. While the Government has now charged the Panel with setting the scale of ambition for the amount of woodland expansion in England we feel strongly that Defra should also make it clear to the panel who are operating within Defra’s terms of reference that the NEWP and NEA are starting points for the Panel’s work.

1.4 Similarly, we welcome the NEWP’s emphasis on protection of valuable habitats such as ancient woodland, but its achievement requires the commitment of other Government departments. DCLG are especially key to this with the National Planning Policy Framework being prepared at present. Oaken Wood in Kent where 32ha of ancient woodland is currently threatened by quarrying proposals shows how very real the need is for greater connection.

1.5 However the wording around the NPPF suggests the primacy of economic considerations rather than the ecosystems approach which characterises the NEWP generally.

2. Other elements which are supported

2.1 A commitment to the creation of 200,000 ha of new priority habitat. We believe that new native woodland should be at the forefront of this drive.

2.2 The emphasis on payment for ecosystem services, the Ecosystem Markets Task Force and the Natural Capital Committee. The NEA shows the enormous potential of woods and trees to deliver a wide range of ecosystem services through expansion. It is essential that delivery is properly rewarded and incentivised.

2.3 The enablement of partnerships to establish NIAs. Landscape scale action is critical to effective habitat restoration and expansion and will allow a wider range of communities to engage with the natural environment.

2.4 The key overarching theme of ‘reconnecting people and nature.’
3. Other areas that could be improved

3.1 We welcome the stated desire to see more restoration of plantations on ancient woodland sites but the Government should be showing the way by making a commitment to restore all planted ancient woods in its own ownership (around 35,000ha)

4. Omissions

4.1 An action plan is required to translate into delivery on the ground. Similarly, whilst we fully recognise the difficult funding context, a funding strategy is needed, addressing both public and private funding.

Annex 1

The Woodland Trust is the UK’s leading woodland conservation charity. We have three aims: to enable the creation of more native woods and places rich in trees; to protect native woods, trees and their wildlife for the future; to inspire everyone to enjoy and value woods and trees. We own over 1,000 sites and have 300,000 members and supporters.

20 June 2011
Further written evidence submitted by the Woodland Trust (NEWP 11A)

The Woodland Trust welcomes the opportunity to respond to this consultation. The Trust is the UK's leading woodland conservation charity. We have three aims: to enable the creation of more native woods and places rich in trees; to protect native woods, trees and their wildlife for the future; to inspire everyone to enjoy and value woods and trees. We manage over 1,000 sites and have 300,000 members and supporters.

Our response focuses upon some but not all of the questions posed.

General Comments

• The Woodland Trust welcomes the vision and aspirations set out in the White Paper. In particular we welcome the recognition of trees and woods as especially cost-effective vehicles for delivering ecosystem services. This builds on the clear findings of the National Ecosystem Assessment in this regard. The White Paper also acknowledges the Read Report's conclusions on the role of forestry in combating climate change as well as delivery of a range of other benefits. Read concluded that this should mean significant woodland creation.

• The White Paper also sets out the Government's ambitions for a 'major increase in woodland cover' which we welcome, but what is lacking is a target for this. All other parts of the UK have a target and the NEA noted that the UK Forest Carbon Sink may soon decline because of dwindling planting figures in what is already one of the least wooded countries in Europe. However, the White Paper does make a very welcome commitment to the creation of 200,000 ha of new priority habitat. We believe that new native woodland should be at the forefront of this drive and that we should be planting 15,000 ha a year with the aim of doubling native woodland cover over the next fifty years.

• The Independent Panel on Forestry Policy can provide important advice on how we tackle barriers to woodland creation and protection. We believe, however, that the Government needs to provide leadership and a clear map for the journey. This means rooting the Panel's work firmly within the NEWP and NEA's aspirations.

• We also welcome the White Paper's emphasis on protection of valuable habitats such as ancient woodland but achievement of this, as we address in relation to question one, requires the commitment of other Government departments - especially around the National Planning Policy Framework - and there is worrying evidence that this is not sufficiently strong. Rather, the NPPF suggests the primacy of economic considerations rather than the ecosystems approach which characterises the NEWP generally.

• Finally, where Government itself owns land it should be setting the standard for the rest of society. We welcome the stated desire in the White Paper to see more restoration of
plantations on ancient woodland sites but the Government should be showing the way by making a commitment to restore all planted ancient woodland sites in its ownership (around 35,000 ha).

What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

1. The cross-Government tone of the Natural Environment White Paper is a very welcome step forward. The innovative National Ecosystem Assessment clearly underlines the centrality of the natural environment to our future prosperity and well-being. This should serve to drive much greater cross-Government action to realise these benefits.

2. However the crucial first test represented by the draft National Planning Policy Framework (NPPF) suggests that this is far from being the case. The draft NPPF is heavily characterised by the primacy of economic considerations above environmental ones. A strong example of this is that of the wording around ancient woodland and other vital habitats where the policy, as currently drafted, will undermine our future efforts to protect ancient woods and trees.

3. This states that:

   planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss

4. In the context of a document that is characterised by a presumption in favour of development the caveat at the end of the paragraph leaves a habitat like ancient woodland looking decidedly vulnerable. There are already 430 ancient woods under threat due to weaknesses in existing planning policy and countless ancient trees in the countryside left unprotected and at risk. The impression of an innovative White Paper, contrasted with the overall trend of Government policy, is reinforced by High Speed 2 where little consideration appears to have been given to impact upon the natural environment.

5. Similarly, the inclusion of the environment within the 'Red tape challenge' in the same year that the NEWP is talking about 'placing the value of nature at the centre of the choices our nation must make.' This sends out signals that the NEWP’s aspiration of ‘mainstreaming the value of nature across society’ is not understood across Whitehall.

6. Recognising the wide range of services provided by the natural environment also means recognising the important role of local green infrastructure provision. This may mean more protected budgets for Local Authorities in relation to land management. It should also trigger thinking about how LA landholdings can best be managed. For example whilst recognising the

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1 Rt Hon Caroline Spelman MP. Foreword to 'The Natural Choice'
value and importance of open spaces, the report, *Trees or Turf - best value in managing urban green space*, produced by Land Use Consultants, compares the costs of maintaining a number of grassland regimes with those of different woodland types in urban areas. The results show that native woodland creation can provide an attractive and less costly alternative to amenity grassland in the right location as well as important wider policy reasons that are also in line with the NEA and NEWP.

7. The report also outlines the direct or indirect cost savings of the broader benefits to be gained from planting trees, including flood mitigation, increased biodiversity, improved air quality, reduced energy costs for buildings, improved health outcomes and locally sourced timber and woodfuel. The NEWP, when implemented on the ground, should help to deliver on all these benefits.

**Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?**

8. We warmly welcome the concept of Nature Improvement Areas. The landscape level action which they embody has long been a central tenet of the Woodland Trust's own conservation approach. However it is important to recognise that twelve areas alone will not herald the “step change” in biodiversity conservation that the NEWP and England Biodiversity Strategy claim. Rather the twelve areas need to be viewed as exemplars. Whilst recognising the difficult financial context, it needs to be noted that the funding is limited and for only three years. This does not recognise the length of time many habitats need even to simply become established without considering the long term biodiversity declines they are supposed to be tackling.

9. The landscape scale model represented needs to be rolled out very quickly and should effectively cover the whole country. In other words, nature needs to be ‘improved’ everywhere, and NIAs should simply be the local expression of an action plan based on an ecologically sensible boundary. Having a series of discrete NIAs covering a very small proportion of the country will have little impact and could serve to draw funding away from elsewhere. They are also dependent on funding of landowners to undertake measures. However it is not clear that anything in the proposals will make this happen given the current levels of funding for the pilot schemes.

10. The success criteria of LNPs and NIAs should also be defined nationally. For example, Defra needs to show how the delivery achieved by LNPs and NIAs will contribute to key measurable ambitions within the White Paper such as the creation of 200,000ha of priority habitat.

11. Similarly, the Government may need to do more than simply ‘encourage’ Local Nature Partnerships, LEPs and Health and Well-Being boards to work together given the potential for

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2 Land use Consultants report for the Woodland Trust (2011) 'Trees or Turf - best value in managing urban green space'
conflicting objectives. Tapping into private investment through LEPs will be crucial to ensuring the NIAs are viable.

12. Overall however, until some mechanisms for transfer of funding from beneficiary to provider are developed it is difficult to see what will change in terms of landowner engagement. Government will have to intervene to create markets or to ensure transfer via fiscal arrangements e.g. tax incentives.

13. We welcome the emphasis upon natural capital and the fact that the Natural Capital Committee will report in to the Economic Affairs Committee. It is unclear at present however how the Natural Capital Committee will operate. It will be important that the scoping study for a natural capital asset check due to be carried out this year builds on the NEA.

14. The reduction in staff and responsibility at Natural England also inevitably weakens the institutional framework upon which much environmental work was based. Whilst recognising that the Government would like local communities to take over some of this responsibility it is unclear that the mechanisms or funding systems are in place to enable that to happen.

15. Finally, concerns about the extent to which the NEWP really is a cross Governmental policy are reinforced by the fact that even within Defra, the catchment pilots – set up to achieve Water Framework Directive targets but with much biodiversity potential – remain unrelated to other environmental work with no obvious mechanism to coordinate work.

What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

16. An important starting point is to institute a shared understanding of sustainable development. We would wish to see the 2005 UK Sustainable Development Strategy definition of sustainable development embraced across Whitehall.

17. The NEA has clearly demonstrated the links between the environment and wider Government policy but there are several areas within NEA where this could be followed up in more detail.

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3 UK Government (2005) Securing the Future. It set out four sustainable development priorities:
♣ Social progress which recognizes the needs of everyone.
♣ Effective protection of the environment.
♣ Prudent use of natural resources.
♣ Maintenance of high and stable levels of economic growth and employment
18. Despite the ever growing body of knowledge available illuminating the value of nature to society, certain individuals and groups still do not act upon this. The barriers which prevent such action should therefore be a priority area for research.

19. Finally, another key area is the primary issue of how, especially at the level of individual land holdings, society values ecosystem services and rewards the appropriate land owners for their provision. What mechanisms can be devised? How will they operate? How do the public, private and voluntary sectors ensure that money flows from the beneficiary (including the whole of society) to the supplier i.e. the landowner? What other barriers (social, cultural and economic) are there to landowner action? How will actions be mentored and measured? How will quality and sustainability be ensured?

**What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?**

20. A very good example here is the recent Forest Research report on woodland measures to deliver the Water Framework Directive (WFD) which had examples from other parts of Europe and the US. 4

**Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?**

21. In general there is a good deal to welcome in the chapter on reconnecting people and nature and we applaud the ambition shown. The lack of readily accessible greenspace is at the heart of the disconnection from the natural world which the White Paper rightly seeks to address. It could therefore be strengthened by taking greater account of existing tools such as the Woodland Access Standard and the Accessible Natural Green Space Standard.5 It should be made clear that the benchmarks these set out represent a key starting point for the work of the Green Infrastructure Partnership. The recent findings of the ONS consultation on work towards an index of national well being which found that accessible green space was the biggest environmental concern of respondents should also be a spur to action.6

22. We welcome the recognition in the Public Health White Paper of the important role of greenspace, and trees in particular, in relation to public health 7 and wish to see a strong emphasis on partnership working between Local Nature Partnerships and Health and Well Being Boards.

23. The proposed new Green Space Designation is a very welcome step forward but initial signs are that the criteria proposed are quite restrictive.

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5 Woodland Trust (2009) Space for People
6 ONS (2011) Measuring National Well-being consultation
24. Finally, whilst recognizing the pressures on the National Curriculum, we would like to see a strong commitment to embed outdoor more firmly in the Curriculum. Ensuring every child has the opportunity to plant trees as part of their education would be a straightforward action which could move this agenda forward.

28 September 2011
Written evidence submitted by the Campaign to Protect Rural England (CPRE)  
(NEWP 12)

Introduction


2. Broadly, we welcome the White Paper, and particularly its recognition of the innate value of nature, provisions to establish Local Nature Partnerships (LNPs) and create Nature Improvement Areas (NIAs) and the sections on light pollution and local landscape character. However, there are also challenges, including the extent to which this is a White Paper on which the whole of government, not just Defra, will deliver and the critical role of planning policy in achieving the aims it sets out.

Positives

3. *The Natural Choice* is, we hope, an indication of a serious intention to be ‘the greenest government ever’. We are pleased with its recognition of nature’s intrinsic value; while we welcomed the publication of the National Ecosystem Assessment and its work to value nature’s services, it is important that the Government realises that nature matters and should be valued in its own right.

4. Proposals for LNPs and NIAs should help take forward the vision of protecting and restoring nature set out in the *Making Space for Nature* report. Government funding for these initiatives is welcome although, at £8.5 million, limited, and Ministers will need to make more use of other budgets, such as Environmental Stewardship, to further their objectives. More clarity on how government will move these initiatives forward would be welcome. We understand that there will be a competition for funding to establish NIAs, but it is unclear whether LNPs will emerge organically, or be kick-started by government. Local action for nature should be encouraged, but it will need national support.

5. We welcome many other aspects of *The Natural Choice*, including support for the *Love Where You Live* anti-litter campaign, the prospect of progress on light pollution and backing for national landscape character area profiles and community engagement in landscape planning. We also welcome support for Quiet Areas, although the latter should be more broadly defined to deliver wider benefits for tranquillity in rural areas.

Challenges

6. The whole Government needs to deliver the White Paper. We welcome the intention that this will be the case and the associated actions it contains for a range of Departments. We hope to see a demonstrable commitment to put the natural environment at the heart of policy-making across government from now on.

7. Specifically, the Communities and Local Government Department’s new National Planning Policy Framework (NPPF) will need to reflect strongly the position set out in the White Paper that protection and improvement of the natural environment is at the heart of good planning. The direction of the Government’s planning reforms remains unclear. CPRE is deeply concerned that the Treasury, through the Budget Statement, sent a strong signal that there should be a default ‘yes’ to development. This would be at odds with the vision set out in *The Natural Choice*. CPRE wants to see a NPPF that sets out a strong basis for enhancing England’s natural environment.

20 June 2011
Further written evidence submitted by the Campaign to Protect Rural England (CPRE) (NEWP 12A)

Introduction

1. The Campaign to Protect Rural England (CPRE) welcomes the opportunity to submit evidence to the Select Committee on the Government’s Natural Environment White Paper, *The Natural Choice*. We previously made a short submission to the Committee’s earlier Inquiry on the White Paper.

2. We broadly welcome the White Paper, and particularly its recognition of the innate value of nature, the provisions to establish Local Nature Partnerships (LNPs) and create Nature Improvement Areas (NIAs), and the sections on light pollution and local landscape character. We also have some concerns, however, including the extent to which this is a White Paper on which all of government, not just Defra, will deliver, and the threat that a weakened planning regime will undermine its aims. The latter point is even more important now following the publication of the draft National Planning Policy Framework that, in its current form, poses a serious threat to the countryside.

3. This submission does not address all of the questions set out in the call for evidence, but focuses on areas in which CPRE has particular expertise and interest.

Actions required across Government Departments, from local government and by civil society

4. It is of paramount importance that the Government as a whole makes the delivery of the Natural Environment White Paper a priority, and that leadership within Whitehall is not left solely to Defra. The development of key indicators of progress (paragraph 6.6 of the White Paper) will be an important part of this. These should be ambitious and stretching, with clarity about the responsibilities of different Government departments. We are pleased that the Minister for Government Policy will hold departments to account for the way in which they mainstream sustainable development (paragraph 3.40).

5. Although Defra is only one of the departments that will be involved in delivering the White Paper’s commitments, it does have a leadership role, and the Department should therefore set out clearly which teams are responsible for ensuring that particular commitments are realised, and retain a team with overall responsibility for White Paper delivery. The Secretary of State and her ministerial team should also be clear that fulfilling the White Paper’s commitments is critical for them.

6. While both local government and civil society groups have an important role to play in carrying forward the commitments of the White Paper, for example in establishing Local Nature Partnerships (LNPs) and making proposals for Nature Improvement Areas (NIAs), the Government is ultimately responsible for ensuring that the vision set out in the White Paper is delivered. Although action by local and non-governmental partnerships should be actively encouraged, it should not be seen as a substitute for government action. The Government must be prepared to step in if it is clear that key
commitments are not being met, and to provide the funding and regulatory support needed to make the White Paper’s goals a reality.

7. Aspects of the Government’s current policy approach will make it more difficult to realise the aims and objectives of the White Paper. The Red Tape Challenge has recently considered a very broad sweep of environmental regulation, and raised questions about whether these regulations should be simplified or, in some cases, abolished altogether. While it is sensible to keep regulation under review, our natural environment would be in a significantly poorer state now without the range of legislative protections (including designated landscapes and wildlife sites, appropriate planning controls and establishment of bodies that give independent environmental advice to government) that have been built up over time. Defra should be robust in defending effective environmental regulation.

8. The current draft National Planning Policy Framework (NPPF) is a major concern for CPRE. If unamended it will pose a significant threat to the Government’s vision for the natural environment. While ongoing protection for designated sites, such as National Parks and Areas of Outstanding Natural Beauty, is welcome, the NPPF proposes to remove protections for the undesignated countryside. Coupled with the scrapping of density targets and policies that prioritise brownfield development, this opens up the prospect of significantly more development in the countryside. The apparent downgrading of ‘ordinary countryside’ in the NPPF is also worrying given that the White Paper’s definition of ‘natural environment’ includes “urban green space and open countryside, forests and farmed land” (p7), without specifying that it should enjoy protective designation. It is therefore imperative that Defra works with the Department for Communities and Local Government to make changes to the NPPF to restore to national planning policy the protection of the ‘ordinary countryside’ (particularly as set out in paragraph EC6.1 of Planning Policy Statement 4, which will be superseded by the NPPF).

The institutional framework – Local Nature Partnerships and Nature Improvement Areas

9. CPRE welcomes the proposals for both LNPs and NIAs, but it will be some time before we can judge how effective they will be.

10. It is encouraging that there appears to be a healthy number of bids to establish LNPs, although we have had some concerns about the short initial timescales for registering interest (which are challenging for organisations that, at local level, are heavily reliant on volunteer activity). Organisations considering establishing LNPs need more guidance from Defra on its vision for these partnerships, and how they should contribute to the national strategy for restoring nature.

11. We believe that, if LNPs are to be successful, they should achieve as wide coverage as possible (preferably 100% of England’s land area), to ensure that no part of England is left out of the White Paper’s strategy for the natural environment, and that resources and effort are not simply concentrated in areas that are already of the highest value for nature.
The Government and its agencies should therefore be ready to offer additional support and advice to help establish partnerships in areas where there are gaps. LNPs should work closely with Local Economic Partnerships, and encourage co-operation by local authorities in areas such as land use planning, the enhancement of nature and mitigation of flooding. LNP membership must include representatives of environmental NGOs, and LNPs should be open to seeking views from environmental groups in their areas that are not formally part of the partnership (some smaller groups may not have the resources to become actively engaged in LNPs, but will nonetheless be able to provide useful advice).

12. LNPs should make use of information about national and local landscape and wildlife priorities provided by Natural England and the Environment Agency (so for example they should be aware of the National Character Areas covered by their partnership). They should also be supported by a team within Defra which can both provide them with relevant national information and learn from them about barriers to their work that can only be resolved through national policy interventions. An LNP’s vision should be incorporated into relevant local plans and, if the partnership crosses the boundaries of several local authorities, the duty to co-operate should ensure that all authorities make the LNP’s vision their strategic plan for the natural environment in their areas. Finally, LNPs should be required to produce concise annual reports giving an honest assessment about their progress and obstacles, and these reports should be collated by Defra in reporting on progress against the White Paper’s commitments for England as a whole.

13. NIAs begin to take forward the Lawton vision of landscape-scale conservation. We welcome Defra’s commitment of £7.5 million for the initial tranche of 12 such areas, and the indications that there is significant interest in the competition for these funds. But these NIAs can only be the start of a process of restoring England’s ecological networks at the landscape scale that must be much more extensive, and there is no indication from the Government as to whether there will be subsequent tranches of NIAs, and whether any funding for them will be available in the longer term (see below under resources and ambitions). Lawton’s *Making Space for Nature* report suggested that the annual costs of establishing a coherent and resilient ecological network would be in the region of £600 million to £1.1 billion. Without funding support for subsequent tranches of NIAs, there is a danger that they will simply not materialise.

**Resources and ambitions**

14. There is currently a lack of a clear, long term funding strategy for the White Paper. The individual sums of money made available for LNPs and NIAs are very small (although nonetheless welcome), and there is no indication from the Government as to whether protection and restoration of the natural environment will be a priority for more funding as the economy recovers.

15. The Government is right to draw attention to the increased funding for the Higher Level Stewardship Scheme, perhaps Defra’s most notable success from last year’s Spending Review. This will be an important tool for delivering environmental
improvements across the farmed landscape. As the White Paper says (paragraph 5.20), further reform of the Common Agricultural Policy so that it better supports environmental outcomes will also be critical, and the Government will need to lobby hard for that in the forthcoming debates on CAP reform.

16. It is unavoidably true, however, that the new money made available to achieve the aims of this White Paper falls a long way short of the sums identified by Lawton as being necessary to establish a coherent and resilient ecological network. It seems unlikely that voluntary organisations and community groups will step in to fill this hole. CPRE recognises the financial constraints under which government is currently operating, and we do not feel that it would be realistic at this time to press Ministers to find up to £1.1 billion a year to implement Lawton’s recommendations (and we also acknowledge that Lawton himself did not suggest that all of this funding need come from government). However, the White Paper should be a vision for protecting and restoring the natural environment over 20 to 30 years and, in that context, it should be possible for the Government to set out a longer term vision for a funding strategy that will deliver landscape-scale conservation across England. £1.1 billion would represent around 0.15% of total Government spending so, over the long term, a Government with the stated aim of being the ‘greenest ever’ should be prepared to invest a sum of this nature to deliver a significant improvement in the state of the natural environment.

Public engagement

17. The White Paper correctly identifies the interest people have in engaging with the natural environment, illustrated by the membership and volunteer base of NGOs. It also identifies the role of LNPs in connecting people with nature. In order for this to happen, however, Defra will need to support communities that want to be involved in LNPs, and recognise that volunteers need time to engage with these processes.

18. The Local Green Space designation, which is being consulted on through the NPPF, is a tool that could engage communities better with their local environment, and encourage them to protect what they value. In order to do this, however, it needs to be a strong and ambitious designation. It is worrying that the draft NPPF description of the designation is full of caveats (some of which are also set out in the White Paper). The draft NPPF says that “identifying land as Local Green Space should… be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and essential services”, and that “the Local Green Space designation will not be appropriate for most green areas or open space”. The draft goes on to say that such spaces will need to be in reasonably close proximity to centres of population or urban areas, be “demonstrably special” to a local community and have “particular local significance” and be local in character and not an extensive tract of land (paragraphs 130-131 of the draft NPPF). If the Government wants people to engage with the process of protecting their valued local green spaces, it must not set the bar for designation too high, and should ensure that the designation, when granted, is a meaningful protection.

19. We welcome other initiatives set out in the White Paper to engage people with the
natural environment, including the Big Tree Plant, support for the new ‘Love Where You Live’ campaign on litter (which complements CPRE’s work, for example through our LitterAction website that encourages local groups to clear up litter) and the commitment to work with local authorities and businesses on both tranquillity and light pollution.

20. The White Paper correctly identifies that clear, well maintained paths and bridleways are important to give people access to the natural environment. It has less to say about the Government’s ongoing strategy for improving access to the countryside which is critical if we are to inspire people to value nature. We hope that the Government will continue with the process of designating the England coastal route, and we also look forward to hearing from Ministers how they will provide improved opportunities for access to England’s woods and forests.

23 September 2011
Written evidence submitted by the Campaign for National Parks (NEWP 13)

1. The Campaign for National Parks (CNP) welcomes

1.1 The aspiration to enable nature’s recovery: especially the commitment to create 200,000ha of priority habitats; and the support for Nature Improvement Areas (NIAs), including £7.5M to enable NIA partnerships. National Parks have the potential to play a major role in delivering this goal as demonstrated by the Joint Ambition from key protected landscape stakeholders.

1.2 The emphasis on reconnecting people, particularly school children, with nature: Including the support for Local Nature Partnerships; on-going support for schools and disadvantaged communities; and the emphasis on using the Local Sustainable Transport Fund for this purpose.

1.3 The commitment to embed the value of nature (as explained in the NEA) in our economy and the establishment of the independent Natural Capital Committee reporting to the Chancellor. We also look forward to the promised 2012 action plan outlining business opportunities that pay back to nature. We see National Parks as key areas in which to pilot these approaches.

2. CNP believes the following should be improved:

2.1 Clarity on how the views of the Natural Capital Committee will be taken into account in Government’s decision making about the economy – what tangible difference will this make to improving nature on the ground?

2.2 Clarity on how the government’s planning reform agenda will respond to the commitments outlined. The National Planning Policy Framework and Localism Bill must put the real value of nature and the environment at the heart of future planning decisions, thus ensuring that vulnerable wildlife and beautiful landscapes are protected and restored.

2.3 Greater recognition and support for National Parks in terms of the hugely important role that they can play in restoring nature and reconnecting everyone with it.

3. CNP thinks that Government should rectify these omissions:

3.1 A clear funding strategy. Although the funding for NIAs is welcomed, the ambitions in the NEWP are out of step with the resources available to achieve them (Lawton estimated that between £0.6bn and £1.1bn was necessary to restore our natural environment). The National Ecosystem Assessment clearly supports the added value to the economy that a high quality environment
provides – there is a substantial economic case for targeting Government funding towards areas like National Parks that have huge potential to deliver vital ecosystem services.

3.2 Much stronger and more specific commitment to redistributing CAP funds (especially Pillar 1) towards those farmers who are delivering the greatest environmental public benefits through managing their land. For too long Pillar 1 of the CAP has been used to sustain farming practices and systems that can have adverse impacts on wildlife, landscape and a range of other ecosystem services. This must be addressed.

3.3 Back up the commitments to reconnecting people with nature with more resources and support for disadvantaged communities, which will enable this to happen. CNP has valuable experience of doing this through our Mosaic programme.

20 June 2011
Friends of the Earth England welcome the NEWP as early progress in the Government’s programme. Rapid development of the detail is now required to assist assessment of how NEWP ambitions and intentions will be enacted with the required political support. The detail and implementation plans will also test the support from all Whitehall departments and the quality of the Government’s involvement of and support for civil society organisations.

The NEWP displays renewed enthusiasm for and understanding of the critical underpinning provided by nature to a healthy, vibrant, resilient and sustainable society and economy. Landscape scale planning, the role of natural networks and better accounting for nature in decisions can lead to a transformation of nature’s chances although other than considering its own procurement and estate management the NEWP offers little insight to how government as a whole will function. To be a lasting policy NEWP must attract ongoing political attention and avoid the trend for good intentions to be undermined by contradictory policies promoted by the rest of Whitehall.

The NEWP draws on biodiversity offsetting, as an attempt to make up for damage, and valuation of nature, to raise policy makers’ appreciation of nature’s costs and benefits. The complex, difficult-to-measure and non-interchangeable characteristics of biodiversity make it difficult, if not impossible to trade, or offset, whether in a UK or global context. There is no substitute for political leadership and the use of any new tools should not be a replacement for consistent action to protect and improve our natural environment.

We welcome NEWP recognition that the UK’s reliance on commodities such as palm oil, cotton and soy has significant impacts on biodiversity overseas. Beyond this there are no firm commitments to address those impacts relying instead on voluntary business action. The Government could reduce the livestock industry’s use of soy in animal feed by supporting home grown feed production; opportunities are available through CAP reform and would be in line with NEWP commitments to show ‘environmental leadership’ internationally (page 59) and within Europe (page 63, para 5.19). CAP reform will require better support for sustainable livestock production, and shift to supporting more home grown feedstock, linked to mandatory environmental standards.

The Government’s localism, planning and growth agendas are unknown quantities for NEWP delivery. Much of the language to date, notably at and since the March 2011 Budget, has focussed on aligning public policy to ‘pro-growth’ policies of indeterminate quality and quantity and no sense of how they advance genuine sustainable development. Nature and economy are being treated separately for example with the formation of both Local Nature Partnerships (LNPs) and Local Enterprise Partnerships (LEPs) which, if the past is a guide, may see NEWP aims playing second fiddle to LEP / Regional Growth Fund bids. Without dramatic shifts in political understanding there is every chance that ‘going for growth’ will entrench environmental damage and replicate the form of development patterns and behaviours which have contributed to the environmental decline the NEWP seeks to address.

20 June 2011
Written evidence submitted by London Wildlife Trust (NEWP 15)

1. London Wildlife Trust

1.1 London Wildlife Trust is the only charity dedicated solely to protecting the capital's wildlife and natural spaces, engaging London's diverse communities through access to our nature reserves, campaigning, volunteering and education. See: www.wildlondon.org.uk

1.2 The Trust supports The Wildlife Trust's response to the Natural Environment White Paper (submitted separately), but wish to add some other points.

2. Key elements supported

2.1 We support in principle the commitments to:
  • resource the Big Garden Wildlife scheme, with a new Wildlife Garden of the Year competition;
  • support the Green Flag Award scheme;
  • inaugurate a network of 50 Natural Value Ambassadors;
  • establish a Green Infrastructure Partnership;
  • create a new fund for biodiversity recording in the voluntary sector.
  • create new local green area designation;
  • remove barriers to learning outdoors;
  • launch a new phase of Muck In4Life;
  • continue support for the National Wildlife Crime Unit.

2.2 The creation of Local Natural Partnerships should not undermine existing activity that already meets the White Paper’s objectives (for example successful Biodiversity Partnerships delivering cross-sectoral approaches to urban biodiversity (for example developing green infrastructure)).

3. Areas where further clarity is required

3.1 We support the recognition for the need to reconnect society with our natural world. The growing disconnection can be particularly acute in urban areas1, but resources to address this are still the exception rather than the rule. The NEWP makes cautious steps in this direction, but much of the intentions focus on food and healthy eating. Stronger commitments are required (in terms of resources and priorities) to address ‘nature deficit disorder’ (not just in young people), and clarity over the immediate steps needed to help address it in the longer-term.

3.2 We remain to be convinced that the forthcoming planning reforms will not dilute a system already weak in its ability to protect the nature of our city. We would like to see stronger demonstrable support from DCLG that the commitments in NEWP will be included in the National Planning Policy Framework, and that the existing protection awarded to species, habitats and protected sites is maintained, and if possible further strengthened where warranted.

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3.3 Whilst biodiversity offsetting has potential, we are concerned that the ecological assets of London (and other urban areas) will be more vulnerable to such an approach (on the basis that mitigation is carried out far from a development site). Any pilots put in place should recognise the equity of ecological importance (and potential) between town and country, and address the issues of connecting people to nature (as set out above).

3.4 A new local Green Area Designation: how will this complement the many existing designations and the variable protection they’re already given within the planning system?

4. Government should rectify the following omissions.

4.1 There is no explicit reference to Local Wildlife Sites and other non-statutory sites that already make a signification contribution to ecological networks in urban areas; important sites in their own right and stepping stones to the wider countryside.²

² There are over 1440 wildlife sites in London, that provide the critical framework for the green infrastructure of the city, and the base line for developing landscape scale approaches to restoration.

20 June 2011
Written evidence submitted by the Game & Wildlife Conservation Trust (GWCT), the Farming & Wildlife Advisory Group (FWAG) & Linking Environment And Farming (LEAF) (NEWP 16)

The Trusts believes that the publication of the White Paper, following on from the Lawton Report and the National Ecosystem Assessment, is an important step towards the implementation of significant improvements to the natural environment.

In particular we support and welcome the following objectives:

1. The commitment to publish a new Biodiversity Strategy for England. This will need to focus on species recovery.

2. The commitment to halt overall biodiversity loss through the establishment of ecological networks for the benefit of wildlife and people.

3. Recognition of the importance of working at 'landscape scale': nature does not recognise political or ownership boundaries. More can be achieved by working with catchments, Joint Character Areas and by groups of landowners and farmers acting in concert.

4. The establishment of Local Nature Partnerships (LNPs), which engage the support of local people and communities. We believe this could deliver more for nature and communities than the Integrated Biodiversity Delivery Area or any other designation approach.

5. The commitment of £1m to fund LNPs. For these to be a success effective facilitators will be crucial. The commitment to increase access to nature through funding educational visits and supporting events like Open Farm Sunday will be important to communities to engaging in LNPs.

6. We consider the piloting of Nature Improvement Areas to be inspired. It is prudent to restrict this to 12 initial areas and learn from this exercise.

7. Following on from the Foresight Report, we are pleased that this White Paper contains a commitment through government, industry and environmental partners to reconcile our goals of improving the environment and increasing food production, and the commitment to conclude this within 12 months.
Sections which could be improved:

8. The sourcing of additional income through biodiversity off-sets could bring serious potential threats from development, particularly if coupled with a weakening of planning rules. This funding mechanism must not prejudice the protection of the natural environment through strategic and land use planning.

9. We believe that one of the keys to increasing food production will be a greater emphasis on better soil management and the undertaking to carry out a research programme on soil degradation is welcomed. However against the background of declining expertise and numbers of professionals we believe there is a strong need to establish a knowledge exchange network, as recommended in the Royal Agricultural Societies’ 2008 report: ‘The current status of soil and water management in England’.

10. Further clarification is needed for us to comment on the Green Area Designation concept. We await the detail of how this might work in practice.

Suggestions for further inquiry:

11. We would welcome further investigation by the Committee of the means whereby agri-environment schemes can achieve higher take-up and greater support from the farming community as well as more effective outcomes in terms of habitat and species diversity in the context of targets for 2020.

12. We recommend the Committee investigate further the means of reconciling increased food and commodity production with improved biodiversity.

21 June 2011
Written evidence submitted by English Heritage (NEWP 17)

English Heritage is Government’s statutory adviser on the historic environment. Although we are sponsored by DCMS, we work closely with Defra and its agencies, particularly Natural England, to ensure a co-ordinated approach to the historic and natural aspects of the environment. Through our own statutory responsibilities we have a particular interest in landscape and would therefore like to offer the following comments on the Natural Environment White Paper:

1. Landscape.

We welcome acknowledgement within the White Paper of the inter-relationship between cultural landscapes and nature, with nature being described as embracing landscapes which are themselves ‘the result of thousands of years of interaction between people and nature’.

In this context, however, English Heritage considers that the lack of any reference to the Florence (European Landscape) Convention, for which Defra is the lead body within Government, is a regrettable omission. We believe landscape, as defined by the convention, provides an important integrative concept, bringing together the cultural and natural interests in land and land use, as well as recognising the interests of communities. With the Convention’s emphasis upon ‘landscapes, as perceived by people’, we would suggest that it has the potential to provide a more people-focussed framework for securing public engagement in Defra’s land-based and environmental policies than, for example, water catchment areas or ecosystems.


We note the proposals for more integrated advice through partnerships, with the Environment Agency, Natural England and the Forestry Commission participating in the ‘Single Voice’ initiative. In this context, we welcome the White Paper’s statement that ‘Where appropriate, they will work in partnership with English Heritage, which also has statutory responsibilities for landscape management’.

We believe it is very important for Government to find ways to bring together the landscape interests of Defra and DCMS at a high level. Without this we have some concerns that the ‘Single Voice’ initiative might actually widen the gap between the provision of advice on the natural and historic environments.

3. Protecting and Improving woodland and forests.

We welcome the White Paper’s acknowledgement of the cultural and heritage value of ancient woodland, although we consider that these values also extend – and should be recognized – across the entire public forest estate and in forestry policy in general. In respect of the need to better integrate environmental objectives – specifically the management of existing woodland and the creation of new woodland - we are concerned that the Independent
Forestry Panel’s terms of reference make no mention of the cultural heritage of woodland as a public benefit.

4. Diverse and living landscapes.

English Heritage strongly endorses the intention to update and improve the National Landscape Character area profiles and we are working with Natural England to achieve this.

We note, however, that the ecosystems services approach is now envisaged as a key attribute of these profiles and, in this context, we are concerned that the White Paper’s definition of cultural services (and cultural heritage) is too narrow, focussing solely on benefits which are non-material in nature. Whilst our cultural landscapes certainly do generate non-material goods, they also have a more direct economic value, by underpinning tourism, inward investment, and local branding etc. We are concerned this is not adequately recognised in the White Paper.

5. Phasing out peat extraction.

We welcome the proposals to protect and restore peatlands, which are an important repository of some of the UK’s most important archaeological sites and unparalleled evidence for past environmental change. We would therefore strongly encourage the Peat Task Force to engage with the historic environment community in its work and we would like to see the shortest possible timetable for the complete phasing out of UK extraction, as well as measures to discourage extraction overseas.

21 June 2011
Written evidence submitted by the Field Studies Council (NEWP 18)

Introduction

The Field Studies Council (FSC) is delighted that the Environment, Food and Rural Affairs Committee have chosen to undertake an inquiry into the recently published Natural Environment White Paper. The FSC was pleased by the commitment in the White Paper to remove barriers to learning outdoors and increase schools’ abilities to teach outdoors. However despite all the benefits, fieldwork provision, particularly in the science disciplines is declining in British secondary schools. A review of 13 published surveys – including FSC published data – highlights a decline in fieldwork provision in the UK between 1963 and 2009\(^1\). We would, therefore, like to see the Government set out in more detail the measures which will ensure that fieldwork plays a greater role in the education of children and young people. This will ensure that there are sufficient numbers of people with the skills and interests to support the White Paper’s implementation in the future.

Background to the FSC

Established in 1943, the FSC has become internationally respected for its national network of education centres and is the UK’s leading provider of field courses. We know that fieldwork is a great way to increase students’ enthusiasm for the environmental sciences, geography and general natural history, thus helping them on their way to becoming the new scientists and natural historians of the future. In recent years the FSC, the UK's leading provider of field courses working every year with 125,000 individuals and nearly 3,000 schools. The charity also publishes over 150,000 natural history and field education resources, and has led a campaign to champion the rights and opportunities for people of all ages and interests to experience their environment at first hand.

The FSC provides opportunities for people of all ages and abilities to discover, explore, be inspired by, and understand the natural environment. We believe that the more we know about the environment, the more we can appreciate its needs and protect its diversity and beauty for future generations. We feel that fieldwork should be a vital element of an imaginative and contemporary science and geography education. The FSC also run a programme of subsidised courses for postgraduate certificate in education (PGCE) student and newly qualified teachers (NQTs), providing effective and meaningful training to deliver learning outside the classroom. These courses provide training in basic fieldwork skills such as group management and site risk assessment. The courses are open to all PGCE Geography, Science and Biology students, and are subsidised by the FSC reducing the cost for the applicant.

Pupil Premium

The FSC welcomes the commitment set out in the Natural Environment White Paper to a Pupil Premium to provide additional funding for more disadvantaged pupils to ensure they benefit from the same opportunities as pupils from more affluent families. We specifically endorse Schools Minister Nick Gibb MP’s recent Parliamentary Written Answer which states that “school may in future wish to consider using the pupil premium funding to enable such children to benefit from out of school educational activities.” We are aware that the Department for Education is exploring options for supporting disadvantaged pupils and we would like to highlight our concerns about the access that pupils from low income families have to school trips and visits; for these children school provision may be the only opportunity they have to experience different environments from their immediate locality.

The FSC recommends that guidance accompanying the pupil premium should state clearly that this can be used to support fieldwork, including in more remote localities which provide an opportunity to explore the UK’s diverse natural heritage.

Teacher Teaching and Outdoor Learning

The FSC believes that any reversal in the decline in fieldwork will have to be led by teachers. We note the Government’s desire for teachers to be free to decide how to teach effectively but are disappointed that there is no consideration in detail of the importance of teacher training and professional development in this process.

Recently published evidence has shown that the quantity of fieldwork training and development within science ITT is highly variable: a significant proportion of providers offer no, or very little, training in fieldwork; and levels of fieldwork training during placements in schools are often unknown. Furthermore, the Government currently holds limited evidence on how best to prepare teachers for fieldwork has no measure of the status of fieldwork within ITT and “has made no assessment of whether the encouragement of fieldwork as a teaching method is adequately supported by teacher training courses”.

The FSC was delighted that the Government asked Sally Coates to lead the Teachers’ Standards Review Group which will consider the future of the Qualified Teacher Status (QTS) Standards. Early drafts of the suggested standards for teachers make no reference to the need for trainee teachers to make effective use of teaching opportunities outside the classroom. It represents a further weakening of training needed to lead fieldwork. We are very concerned that this will further reduce numbers of teachers with the 3Cs (competence, confidence and commitment) to lead fieldwork.

The FSC recommends that standards for achieving Qualified Teacher Status should include a requirement for all trainee teachers (including chemists and physicists, as well as biologists, earth scientists and geographers) to have prepared and taught at least one fieldwork lesson as part of their training.

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2 School Science Review, Association for Science Education, 2009
3 House of Commons Hansard Written Answers, 22 January 2009
Written evidence submitted by the Town and Country Planning Association (NEWP 19)

1.0 About the TCPA

1.1 The Town and Country Planning Association (TCPA) is an independent charity working to improve town and country planning. Its cross-sectoral membership includes organisations and individuals drawn from practitioners in local government, private practice, housebuilders, academia, third sector organisations and special interest groups. It puts social justice and the environment at the heart of policy debate and champions fresh perspectives on major issues of planning policy, housing, regeneration, the environment and climate change. Our objectives are to:

- Secure a decent, well designed home for everyone, in a human-scale environment combining the best features of town and country
- Empower people and communities to influence decisions that affect them
- Improve the planning system in accordance with the principles of sustainable development

2.0 TCPA submission

2.1 The TCPA welcomes the Natural Environment White Paper and its recognition of the key role that planning will have in securing a sustainable future for the natural environment. The White Paper will require a coherent policy approach across Government to ensure effective delivery of policy objectives.

2.2 The TCPA endorses the White Paper's requirement for a more strategic and integrated approach towards planning for the natural environment, which will guide decision-making to ensure development enhances natural networks and encourages greener design. This response sets out the Association’s views on how proposals in the White Paper can be best achieved in line with the current planning reforms.

2.3 There needs to be greater clarity on the relationship between the White Paper and the new ‘presumption in favour of sustainable development’ which will form a central part of the National Planning Policy Framework (NPPF). A consensus on a workable and effective definition of sustainable development across Government is vital to achieving this. The TCPA recommends the Committee examines this issue once a consultation draft of the NPPF is published by DCLG.

2.4 The TCPA supports the idea of Local Nature Partnerships (LNP) in order to improve local leadership, promote awareness and a joined-up approach towards planning for the natural environment. The priority of the LNP Fund must be to support and sustain existing partnerships. The White Paper should address the relationship between LNPs and the new Local Enterprise Partnerships and Neighbourhood Plans, which form a central part of the new planning landscape.

2.5 The White Paper states that planning reforms will enable a strategic approach to planning for nature within and across local areas (2.35). However, the TCPA questions whether the loss of strategic environmental policies and evidence-base from the Regional Spatial Strategies (RSS) and the proposed ‘Duty to Co-operate’ between local planning authorities in the Localism Bill,
will help facilitate the ecosystems and landscape-scale approach to planning which the White Paper advocates. The TCPA recommends the Committee undertake an inquiry into the impact of the new planning landscape for environmental planning¹.

2.6 The TCPA welcomes the establishment of Nature Improvement Areas to bring together local partnerships. However, the removal of RSSs and the impact of this on effective strategic scale planning must be considered, especially on the functional and spatial relationships between this new designation and existing designations.

2.7 The TCPA welcomes the White Paper’s recognition of the role of green infrastructure, including SuDS and back gardens, in relation to adapting to the impacts of climate change (2.78 - 2.83). As lead partner of the pan-European project on Green and Blue Space Adaptation for Urban Areas and Eco-towns (GRaBS)², the TCPA has helped to improve the capacity of local planning authorities to deliver climate-resilient development.

2.8 Finally, the TCPA welcomes the White Paper’s plans for monitoring policies and actions, in particular the publishing of a ‘state of the English environment’ report. However, there are questions around how environmental data can be collated consistently across the nation from local authorities after the abolition of National Indicators; strategic monitoring through annual monitoring reports of the RSSs; and local monitoring requirements for local development plans³.

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¹ As the Communities and Local Government; Transport, and the Environmental Audit Select Committees have done respectively for housing, transport and sustainable development, to which the TCPA gave oral evidence.

² www.grabs-eu.org

³ DCLG, 30 March 2011, Letter to Chief Planning Officers: Preparation and Monitoring of Local Plans
Further written evidence submitted by the Town and Country Planning Association (TCPA) (NEWP 19A)

1.0 About the TCPA

1.1 The Town and Country Planning Association (TCPA) is an independent charity working to improve town and country planning. Its cross-sectoral membership includes organisations and individuals drawn from practitioners in local government, private practice, housebuilders, academia, third sector organisations and special interest groups. It puts social justice and the environment at the heart of policy debate and champions fresh perspectives on major issues of planning policy, housing, regeneration, the environment and climate change. Our objectives are to:

- Secure a decent, well designed home for everyone, in a human-scale environment combining the best features of town and country
- Empower people and communities to influence decisions that affect them
- Improve the planning system in accordance with the principles of sustainable development

2.0 TCPA submission

2.1 This submission should be read in conjunction with the TCPA’s earlier submission to the Committee in its initial inquiry into the Natural Environment White Paper when it was published. The TCPA welcomes the White Paper and its recognition of the key role that planning will have in securing a sustainable future for the natural environment. The White Paper will require a coherent policy approach across Government to ensure effective delivery of policy objectives.

2.2 The TCPA endorses the White Paper’s requirement for a more strategic and integrated approach towards planning for the natural environment, which will guide decision-making to ensure development enhances natural networks and encourages greener design. This response sets out the Association’s views on how proposals in the White Paper can be best achieved in line with the objectives and proposals of current planning reforms.

2.3 The TCPA wants to see an outcome driven and visionary planning system, responsive to people’s needs and aspirations and delivering long term sustainable development for the nation. In light of the recent publication of the consultation draft National Planning Policy Framework (NPPF) by DCLG, the TCPA believes that greater clarity is required on the relationship between the White Paper and a number of key aspects of the planning reforms, in particular where the planning system will have a key role as a delivery mechanism.

2.4 A more detailed TCPA briefing on the draft NPPF and its implications on practice on the ground can be made available to the Committee on request.
The most pressing of these aspects is the relationship between the White Paper and the new ‘presumption in favour of sustainable development’, which is defined in the draft NPPF as one which is largely based on economic considerations. The TCPA recommends that the Committee investigates the impact of the current draft of the NPPF on some of the key objectives of the White Paper. In particular, the presumption challenges the prominence of the plan-led system which has to go through a Strategic Environment Assessment and allocate sites for development. The TCPA recommends the Committee consider how the ‘presumption’ sits alongside the objective of the White Paper to ‘take a strategic approach to planning for nature within and across local areas’.

2.5 A consensus on a workable and effective definition of sustainable development across Government is vital to overcoming this potential conflict. The TCPA recommends the Committee examines this issue and that a consistent cross-departmental definition of sustainable development is adopted based on the 2005 UK Sustainable Development Strategy, which takes a comprehensive approach to social, economic and environmental considerations.

2.6 There is at present a lack of articulation of the role of Green Infrastructure in the draft NPPF which is prioritised in the Natural Environment White Paper, and an absence of any definition of Green Infrastructure. It is important cross-departmental collaboration takes place between DEFRA and DCLG to ensure that the multiple benefits of Green Infrastructure are recognised through positive planning policies.

2.7 The Duty to Co-operate, being introduced in the Localism Bill, is another key issue that needs to be considered more closely in the White Paper. The current list of bodies subject to the duty does not include key private sector partners such as infrastructure providers. The reference to the duty in the White Paper does not address these limitations in strategically planning for the natural environment at the functional landscape-scale. Particularly in areas and localities where the removal of Regional Strategies and associated collaboration structures, compounded by diminishing local authority resources, may lead to fragmented and ad-hoc planning functions.

2.8 The TCPA supports the Local Nature Partnerships (LNP) approach in order to improve local leadership, promote awareness and a joined-up approach towards planning for the natural environment. The priority of the LNP Fund must be to support and sustain existing partnerships, and it would be interesting to see how many of the first round approved LNPs are for supporting existing partnerships. The White Paper should address the relationship between LNPs and the new Local Enterprise Partnerships and Neighbourhood Plans, which form a central part of the new planning landscape.
2.9 The TCPA welcomes the establishment of Nature Improvement Areas to bring together local partnerships. However, the removal of RSSs and the impact of this on effective strategic scale planning must be considered, especially on the functional and spatial relationships between this new designation and existing designations.

2.10 The TCPA welcomes the White Paper’s recognition of the role of green infrastructure, including SuDS and back gardens, in relation to adapting to the impacts of climate change (2.78 - 2.83). As lead partner of the pan-European project on Green and Blue Space Adaptation for Urban Areas and Eco-towns (GRaBS)\(^1\), the TCPA has helped to improve the capacity of local planning authorities to deliver climate-resilient development. However the TCPA is concerned with the lack of proper guidance in the draft NPPF for local authorities on delivering sustainable networks of green and ‘blue’ infrastructure, and the commitment of DCLG to publish any additional national guidance. However, in order for local authorities to deliver networks of green and blue infrastructure there will need to be clear policy support in the NPPF and guidance to ensure effective implementation. It is not yet clear whether DCLG will publish guidance on key policy areas alongside the NPPF. If DCLG does not intend to provide guidance on planning for green infrastructure the TCPA suggests that the Green Infrastructure Partnership, which will be launched in October, may provide a suitable cross-sector forum for producing much needed guidance for local authorities.

2.11 The TCPA welcomes the White Paper’s plans for monitoring policies and actions, in particular the publishing of a ‘state of the English environment’ report. However, there are questions around how environmental data can be collated consistently across the nation from local authorities after the abolition of National Indicators; strategic monitoring through annual monitoring reports of the RSSs; and local monitoring requirements for local development plans\(^2\).

2.12 Finally, the National Ecosystems Assessment will be a useful decision-aiding mechanism in the planning process. However its application and relevance in plan-making and development management decisions is currently unclear, particularly in the context of current statutory assessment frameworks. Therefore the TCPA recommends that the Committee explore opportunities for Defra to roll out training and dissemination programmes for planners.

26 September 2011

\(^1\) www.grabs-eu.org

\(^2\) DCLG, 30 March 2011, Letter to Chief Planning Officers: Preparation and Monitoring of Local Plans
The LGA welcomes the positive ambition of the NEWP and its stated intention not to place new burdens upon local authorities. However the paper needs to be clearer about how some of its proposals will link to proposed planning reforms within the Localism Bill.

It is essential that the forthcoming National Planning Policy Framework (NPPF) makes the Government’s national environmental priorities absolutely clear, so this can be accurately factored into local and community-led plan-making.

Government will need to be more ambitious in terms of incentivising local areas that wish to go above minimum compliance for the natural environment. £7.5m extra over the next three years for 12 large "nature improvement areas" and the £1m for Local Nature Partnerships will not stretch far.

1. Partnerships

1.1. The LGA supports the Government’s encouragement of local partnerships, although local authorities and their partners are best equipped to decide for themselves how to organise their efforts.

1.2. Whilst we support the funding offered to ‘Local Nature Partnerships’ and the twelve initial ‘Nature Improvement Areas’, the funding levels for each (at £1m and £7.5m respectively) are unlikely to be sufficient given local aspirations.

1.3. How will Local Enterprise Partnerships interface with the proposals within the White Paper? The issue requires clarification.

1.4. The LGA supports the NEWP’s commitment to the Total Environment initiative which, in collaboration with local authority partners, will identify and address barriers to using green infrastructure, and share best practice.

2. Planning

2.1. The NEWP sets out how Government expect the planning system to contribute to their objective of no net loss of biodiversity. For example, local authorities are invited to pilot a new approach to biodiversity offsetting, working with developers to deliver compensation for unavoidable habitat loss. The LGA commends the Government’s commitment to this issue and supports the voluntary nature of the offsetting scheme, allowing councils to participate should it be compatible with their local priorities.

2.2. The NEWP refers to the Localism Bill and its significant planning reforms. These references must be incorporated into the consultation this summer by Government on the draft National Planning Policy Framework (NPPF) – the LGA is currently consulting its members for their feedback on the NPPF.

2.3. The White Paper highlights the Government’s intention to consult later this year on proposals for a new Green Areas Designation that will give local people an opportunity to protect green spaces. The LGA would like to see more detail as to how the Designation differs from existing Town and Village Green legislation and
what extra value it would add above and beyond regular independently assessed local authority plan-making.

3. **Energy**

3.1. The NEWP refers to the planning system assisting with a more sustainable approach to low carbon-energy. More detail is required as to how Defra will actually facilitate increased use of renewable sources by 2020 and the move towards a low carbon environment.

3.2. The White Paper announces the intention to establish a research programme to ‘fill evidence gaps’ about impacts on the natural environment of the level of infrastructure needed to meet 2050 targets. Government must involve local authorities in this work to ensure any resulting action can be applied effectively at the local level.

4. **Adaptation to Climate Change**

4.1. Action by councils and their partners to reduce the impact of climate change and manage flood risk can produce significant environmental benefits – e.g. providing multi-functional sustainable drainage schemes. The White Paper should ensure that funding mechanisms support the most environmentally beneficial decisions.

5. **Relationship with public health**

5.1. The LGA supports the NEWP’s recognition that the quality of the environment affects people’s health and wellbeing and can have a significant impact on improving health outcomes, for example in encouraging increased physical activity.

5.2. The Health and Social Care Bill proposes a leading role for local government in promoting and coordinating strategies to improve health outcomes and address health inequalities. Local Authorities must therefore be consulted and included in the development of policies around how improvements to the natural environment could improve public health and be implemented effectively at a local area.

21 June 2011
Further written evidence submitted by the Local Government Association (LGA) (NEWP 20A)

1. Introduction

1.1 The Local Government Association (LGA) is a voluntary membership body and our member authorities cover every part of England and Wales. Together they represent over 50 million people and spend around £113 billion a year on local services. They include county councils, metropolitan district councils, English unitary authorities, London boroughs and shire district councils, along with fire authorities, police authorities, national park authorities and passenger transport authorities.

1.2 The LGA welcomes this opportunity to offer written evidence to the Environment, Food and Rural Affairs Select Committee’s inquiry into the Government’s Natural Environment White Paper (NEWP).

2. What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

2.1 The LGA welcomes the positive ambition of the NEWP and its stated intention not to place new burdens upon local authorities. However, the paper needs to be clearer about how some of its proposals will link to proposed planning reforms within the Localism Bill.

2.2 Local Enterprise Partnerships

2.3 Clarification is needed on how Local Enterprise Partnerships (LEPs) will interface with the proposals within the White Paper.

2.4 Planning Issues

2.5 It is essential that the National Planning Policy Framework (NPPF) makes the Government’s national environmental priorities absolutely clear, so this can be accurately factored into local and community-led plan-making.

2.6 In addition, it is important that any future Government proposals fully take into account the Government’s national environmental priorities, if the positive ambition of the NEWP is to be realised.

2.7 The draft National Planning Policy Framework currently out for consultation takes forward the Government’s Green Areas Designation commitment in the NEWP to allow communities to earmark important local green spaces for special protection. The Government has also
published a consultation seeking views on proposals to reform the system for registering new Town and Village Greens under Section 15 of the Commons Act 2006.

2.8 LGA will be seeking clarity around how the Designation differs from existing Town and Village Green legislation and what extra value both of these processes add above and beyond regular local authority plan-making and neighbourhood planning proposals in the Localism Bill.

2.9 The final NPPF must ensure that the three pillars of sustainable development are equally balanced throughout the whole document so that councils can achieve environmental and social benefits for their communities as well as economic outcomes.

2.10 The LGA is working closely with the Coalition Government ministers and officials and key stakeholders to ensure this NPPF genuinely promotes local choice and flexibility. The LGA will be responding to the full NPPF Consultation by the closing date of 17 October 2011.

2.11 **Climate Change Issues**

2.12 The NEWP refers to the planning system assisting with a more sustainable approach to low carbon-energy. More detail is required as to how Defra will actually facilitate increased use of renewable sources by 2020 and the move towards a low carbon environment.

2.13 Action by councils and their partners to reduce the impact of climate change and manage flood risk can produce significant environmental benefits – e.g. providing multi-functional sustainable drainage schemes. The White Paper should ensure that funding mechanisms support the most environmentally beneficial decisions.

2.14 Maps that show how landscape character areas, water catchments and local authority boundaries relate to each other will be of benefit to local authorities in delivering the proposals in the NEWP, but it is essential that they are consulted along with other key stakeholders about the most useful format and content of such maps.

2.15 **Health Issues**

2.16 The Health and Social Care Bill proposes a leading role for local government in promoting and coordinating strategies to improve health outcomes and address health inequalities. Local Authorities must therefore be consulted and included in the development of policies around how improvements to the natural environment could improve public health and
be implemented effectively at a local area.

2.17 From April 2013, Directors of Public Health will be employed within all upper tier and unitary local authorities. They will be ideally placed to influence local services, for example joining up activity on rights of way, countryside access and green space management to improve public health by connecting people with nature.

3. Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

3.1 To effectively implement the NEWP proposals, effective resourcing from both a financial and expertise perspective will be critical. The LGA is concerned that the necessary resourcing is not provided for within the NEWP.

3.2 The LGA supports the Government’s encouragement of local partnerships, although local authorities and their partners are best equipped and must be able to decide for themselves how to organise their efforts. Local authorities will welcome the opportunity to learn from good practice around the country.

3.3 Whilst the intention of the NEWP is not to place new burdens upon local authorities (which is strongly welcomed by the LGA), it does expect local authorities to take a lead in the establishment and ongoing function of the Local Nature Partnerships, at a time when many authorities have had to reduce (or completely lose) the amount of ecological expertise available to them. This is particularly an issue when these partnerships are expected to be self-sufficient.

3.4 Bearing this in mind, we would welcome any Government offer to provide ecological expertise/resources to local authorities or identify ways in which local authorities could access these at little or no cost.

3.5 Local Nature Partnerships have the potential to be effective in delivering the proposals, but only if they are properly resourced.

3.6 Whilst we support the funding offered to ‘Local Nature Partnerships’ and the twelve initial ‘Nature Improvement Areas’, the funding levels for each (at £1m and £7.5m respectively) are unlikely to be sufficient given local aspirations.

3.7 Government will need to be more ambitious in terms of incentivising local
areas that wish to go above minimum compliance for the natural environment.

3.8 We would encourage further information on how future ‘Local Nature Partnerships’ and ‘Nature Improvement Areas’ might be developed across the country in the potential absence of any additional funding and how long-term sustainability might be achieved.

3.9 Further clarification is needed on how Local Enterprise Partnerships (LEPs) will interface with the proposals in the NEWP to achieve maximum benefit to local communities. The links between LEPs may be an important factor as to whether the proposals can be delivered effectively.

3.10 The LGA would encourage local authority input into the Natural Capital Committee once it has been set up and moves its work programme forward.

4. What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

4.1 The LGA supports the proposal for a research programme to fill evidence gaps. Government should ensure that it involves local authorities and other experts in order to ensure future mechanisms are able to be applied effectively at a local level.

4.2 The LGA supports the NEWP’s commitment to the Total Environment initiative which, in collaboration with local authority partners, will identify and address barriers to using green infrastructure and best practice (further details on the Total Environment prototypes can be found in Appendix 1).

5. Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

5.1 Local authorities are one key stakeholder who are in a strong position to engage communities with the natural environment and have a wealth of best practice in terms of community engagement and their expertise should be drawn upon wherever possible.

5.2 It is important that there is clarity on how communities should engage in the maintenance and long-term sustainability of the natural environment and what role Government and other key stakeholders will play.
5.3 It is also key that vulnerable and minority groups are consulted with to ensure that any barriers to engaging with the natural environment they might encounter can be overcome.

Appendix 1:

Table of authorities involved in Total Environment initiative:

<table>
<thead>
<tr>
<th>Place</th>
<th>Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bristol</td>
<td>Green volunteering - aiming to bring together 1,000 green volunteers for the city. Recently awarded an EU grant to support this work. Natural England engaging for the Defra family. Project is now led by a VCS body, but Bristol CC retain an interest.</td>
</tr>
<tr>
<td>Cumbria</td>
<td>Ambition is a pan-Cumbria Local Nature Partnership</td>
</tr>
<tr>
<td>Essex</td>
<td>Currently exploring ideas on Section 106 money and its use, Green Banking, and Carbon Tax / CRC simplification.</td>
</tr>
<tr>
<td>Hampshire</td>
<td>Green infrastructure - including reducing levels of diffuse water pollution, improving access to and condition of waterways, improving the visual quality and functionality of the road corridor, and other land management issues.</td>
</tr>
<tr>
<td>Hertfordshire</td>
<td>Green infrastructure - looking at stakeholder engagement and pilots in North Hertfordshire (with real money attached to them)</td>
</tr>
<tr>
<td>Kirklees</td>
<td>A focus on how the local authority works with Defra agencies - through the lens of Green Infrastructure, flood risk management, use of the Community Infrastructure Levy. Engagement with the Farming Regulation Review.</td>
</tr>
<tr>
<td>Lincolnshire</td>
<td>Flood risk management - in particular options for yielding efficiencies through simplifying funding streams.</td>
</tr>
<tr>
<td>Manchester (Association of Greater Manchester Authorities)</td>
<td>Low-carbon economy - creating quality places that support growth. Exploring strands on Green Infrastructure and flood risk management. Some local work on availability of environmental data.</td>
</tr>
<tr>
<td>Partnership for Urban South Hampshire</td>
<td>Green infrastructure - improving connectivity</td>
</tr>
<tr>
<td>Suffolk</td>
<td>Coastal management - with a bottom-up approach of community engagement, collaborating with local communities to make decisions and determine priorities.</td>
</tr>
<tr>
<td>Worcestershire</td>
<td>Green Infrastructure strand in development - relative quality of the environment a major reason for inward investment. Also scoping work around funding for land management, regulatory services and enforcement service.</td>
</tr>
</tbody>
</table>

22 September 2011
Written evidence submitted by the Food and Drink Federation (NEWP 21)

The Food and Drink Federation (FDF) represents the food and drink manufacturing industry, the largest manufacturing sector in the UK, with an annual turnover of over £72.3bn.

Introduction

1. Food and drink manufacturers are very aware of the natural resources vital to the production of the agricultural raw materials on which we depend and of the impact which our operations have on the ecosystems involved. That is why we established the FDF Five-fold Environmental Ambition in 2007 to promote efficiency of resource use in our member companies in the key areas of carbon, water, packaging, waste and transport - and why we broadened that ambition last year to extend our influence across the supply chain and begin addressing wider issues such as sustainable sourcing and the loss of biodiversity.

Elements in the White Paper which we support

2. We accordingly welcome the White Paper’s emphasis on the value of nature and the relevance of healthy ecosystems to the green growth on which our future prosperity and food security ultimately depend. We strongly support the need to restore and protect natural capital, here and elsewhere in the world, and see the forthcoming reforms of the EU’s Common Agricultural (and Fisheries) Policies as an excellent opportunity to further this process. We also agree with the need to remedy market failure in terms of addressing such impacts and see the accompanying National Ecosystem Assessment as an important step in this direction. But for UK food businesses to remain internationally competitive – and avoid simply displacing adverse effects by manufacturing relocating to other countries – we need to ensure that the external costs of food production are properly reflected in all international markets.

Omissions which Defra should rectify

3. In that context, it is disappointing that there is not more emphasis on the need for better life-cycle assessment across supply chains and for publicly-funded research to support this. The development of environmental product standards inevitably involves trade-offs between different impacts and has to be based on the best available evidence to avoid unintended consequences, particularly in the ways such information is communicated to consumers. There is also a need for a more coherent approach between issues of energy, water and food security, which are closely inter-linked and require fully joined-up policy making, not only in the UK but also at international level. The concept of (English) leadership needs to be balanced both with the need for our own food and farming sector to remain competitive and also with the need to maximise comparative advantage at a global level.

Sections which could be improved

4. We welcome the White Paper’s explicit commitment to increasing food production, and acknowledgement of the potential tensions with the parallel goal of environmental improvement. But we are disappointed that action is confined to a commitment to create a discussion forum over the next 12 months. Meeting the challenge of the Foresight Report to produce more, from less and with less impact and for
transformational change in global food systems requires a clear strategic framework shared at EU and international level. We would like to see Defra take early and clear leadership here working in partnership with the food chain and other stakeholders.

Annex 1

The UK Food and Drink Manufacturing Industry

The Food and Drink Federation (FDF) represents the food and drink manufacturing industry, the largest manufacturing sector in the UK, employing around 400,000 people. The industry has an annual turnover of over £72.3bn accounting for 15% of the total manufacturing sector. Exports amount to almost £11bn of which 77% goes to EU members. The Industry buys two-thirds of all UK’s agricultural produce.

The following Associations are members of the Food and Drink Federation:

ABIM Association of Bakery Ingredient Manufacturers
ACFM Association of Cereal Food Manufacturers
BCA British Coffee Association
BOBMA British Oats and Barley Millers Association
BSIA British Starch Industry Association
CIMA Cereal Ingredient Manufacturers’ Association
EMMA European Malt Product Manufacturers’ Association
FA Food Association
FOB Federation of Bakers
FPA Food Processors’ Association
GPA General Products Association
MSA Margarine and Spreads Association
SB Sugar Bureau
SMA Salt Manufacturers’ Association
SNACMA Snack, Nut and Crisp Manufacturers’ Association
SPA Soya Protein Association
SSA Seasoning and Spice Association
UKAMBY UK Association of Manufacturers of Bakers’ Yeast
UKHIA UK Herbal Infusions Association
UKTC UK Tea Council

Within FDF there are the following sectoral organisations:

BCCC Biscuit, Cake, Chocolate and Confectionery Group
FF Frozen Food Group
MG Meat Group
ORG Organic Food and Drink Manufacturers’ Group
SG Seafood Group
VEG Vegetarian and Meat Free Industry Group
YOG Yoghurt and Chilled Dessert Group

21 June 2011
Written evidence submitted by the National Farmers’ Union (NFU) (NEWP 22)

The NFU represents more than 55,000 farming members in England and Wales. In addition we have 41,000 countryside members with an interest in farming and the country. The NFU welcomes the opportunity to make a submission to the Environment, Food and Rural Affairs Committee on the Natural Environment White Paper.

It is very hard to do justice to our reaction to the White Paper, which contains some 90 commitments many of which will impact on agriculture to some extent or other, in only 500 words. Therefore we have limited the scope of our commentary to just a few key points.

Producing more, impacting less

1. One of the more significant actions in the White Paper is the commitment to bring together government, industry and environmental partners ‘to reconcile how we will achieve our goals of improving the environment and increasing food production’.

2. Particularly significant is the explicit acknowledgement in the White Paper that food production will increase, but also that a number of different organisations will all be brought together to help find solutions. These are big steps forward.

3. The NFU has long argued that one of the biggest challenges facing farmers and growers in England and Wales in the near future will be their part in meeting the expected global demands to produce more food, but also to have less of an impact on the environment. We believe that there are good reasons to feel optimistic about this particular challenge and we look forward to working with Government and others to find the solutions.

Integration of messaging and delivery

4. We are encouraged by the White Paper’s pledge to ‘improve the way government bodies work together so they provide more coherent advice and are easier to work with’ and to ‘carry out a full review of advice and incentives for farmers and land managers, to create an approach that is clearer, more joined-up and yields better environmental results’. However, the Paper falls short of providing a clear commitment to join-up both the messaging and delivery on environmental priorities to farmers and growers.

5. All too often farmers are bombarded with differing and sometimes competing messages on environmental priorities from various bodies and organisations. A more coherent and joined-up approach is needed that spans the range of issues such as climate change, soil management, water quality and wildlife.

Nature Improvement Areas and Local Nature Partnerships

6. The proposals for Nature improvement Areas (NIAs) and Local Nature Partnerships (LNPs) sit firmly at the core of the White Paper but currently appear to have generated more questions and uncertainty than answers. Key unanswered questions include: how will these work in practice and at what scale.

7. As well as unanswered questions we also have a number of concerns, particularly about NIAs. Our principle concerns are that NIAs will:

- Distort the available funding, support and activity away from wider countryside measures such as Environmental Stewardship, Catchment Sensitive Farming or the Campaign for the Farmed Environment. We firmly believe that we need to
prioritise wider countryside measures, not focus our resources in ever smaller areas of the country.

- Tilt the balance of activity towards wildlife and habitats and away from equally important water quality, soil conservation and climate change mitigation activities. Instead, NIAs need to consider how the ‘competing’ environmental priorities are mapped, presented and delivered in an integrated way, preferably using existing delivery approaches in and beyond the agricultural sector. Critically, they must engage early and directly with the individual farmers and landowners in these areas, such that their ambitions are also fully embedded into the aims of the NIA.

**Peat targets**

8. We have to express our disappointment about the introduction of targets on peat. Whilst we support the Government’s ambition to reduce peat use in horticulture, the concern we have is that the aim to reduce this to zero by 2030 is not supported by the available evidence and that further reductions in peat use will be hugely challenging for the industry. The formation and role of the Task Force, with an independent chair, will be key to addressing this challenge.

21 June 2011
Further written evidence submitted by the National Farmers’ Union (NEWP 22A)

1. The National Farmers’ Union (NFU) represents more than 55,000 farming members in England and Wales. In addition we have 41,000 countryside members with an interest in farming and the country. The NFU welcomes the opportunity to make a submission to the Environment, Food and Rural Affairs Committee on the Natural Environment White Paper (the White Paper).

2. We are pleased that the White Paper recognizes the important role that farmers play as managers and stewards of the countryside alongside their vital role in achieving society’s ambitions to produce food and to protect water, wildlife and soil. Farmers are very often at the heart of the environment and are responsible for many of the unique landscapes that people recognise, identify with and enjoy.

3. By 2025 we expect the UK population to be 70 million but by 2050 it is expected that the global population will be approaching 9 billion and, with the added challenge of climate change, food shortages are likely. UK agriculture should be well-positioned to contribute to domestic food production (the Committee will be familiar with the long term erosion of domestic food security) and thereby also improve the farming community’s contribution on EU and global markets.

4. However, with three-quarters of the UK land area in agricultural management the NFU also recognises that farmers and growers carry a unique responsibility for managing the countryside and will play a crucial role in delivering on any future activities.

5. The big challenge, as we see it, will be to find a workable balance between improving the productivity of UK farming while also delivering climate change mitigation, air quality, wildlife protection, flood risk management and water quality priorities. This will require a transformation in farming techniques, substantial investment in research and knowledge transfer and investment on farms.

What actions are required across Government Departments, from local government and by civil society to deliver the White paper’s proposals to grow a green economy and reconnect people with nature?

6. Integration within and between government departments is key to the success of the implementation and delivery, not just of the White Paper’s proposals to grow a green economy and to reconnect people with nature, but to many other of the White Paper commitments, including the plans for a National Planning Policy Framework.

Will the institutional framework outlined for delivering proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective?

7. As we have already indicated, we are pleased that the White Paper states that the Government is committed in bringing together government, industry and environmental partners ‘to reconcile how we will achieve our goals of improving the environment and increasing food production’.

8. In order for the 12 new Nature Improvement Areas (NIAs) and Local Nature Partnerships (LNPs) to be effective, it follows that these should also embrace this ambition that sustainable food production forms an integral part of the landscape rather than being viewed as a hindrance.
9. In addition, we believe that:-
   • A joined up approach whereby all ecosystem services (including food production) were actively promoted and supported is needed;
   • These partnerships must engage early and directly with the individual farmers;
   • There must be a clear focus on the farmer and there must be a clear explanation for these farmers in terms of what participation would mean to their business and importantly in terms of tangible benefits to them (i.e. “what’s in it for them?”);
   • We need to prioritise wider countryside measures, rather than simply focus our resources in smaller areas of the country. For this reason we are concerned that NIAs could potentially distort the available focus and funding away from wider countryside initiatives such as Environmental Stewardship and the Campaign for the Farmed Environment; and
   • The NIAs and LNPs must maintain a balance of activity between a range of equally important challenges and environmental issues including water quality, soil management and climate change mitigation and adaptation, as well as wildlife and habitats.

10. On the proposal in the White Paper for LNPs and Local Economic Partnerships (LEPs) to work co-operatively, we agree entirely with the ambition that plans for economic growth should be discussed in tandem with plans to protect the natural environment and we would also agree that reciprocal representation on both these partnerships would make sense. However, there are still some uncertainties in how the links between LNPs and LEPs may work in practice, particularly if these cover different geographical areas, how these relate to the statutory planning framework and whether duplication may arise. Given that LEPs have failed to engage with rural business interests let alone the environmental dimension of development, we question whether this ambition will be realised.

What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

11. The White Paper includes a key message from the National Ecosystem Assessment that:-
   • Properly valuing the benefits of the natural environment is important and that there are strong economic arguments for safeguarding and enhancing the natural environment.

12. For the first time the White Paper places values on many economic, health and social benefits that the environment provides. But this is an area where we would urge some caution. We believe that the model used in the NEA is far too simplistic and uncertain, not the “robust evidence base” portrayed in the White Paper impact assessment.

13. Our specific concern is that while market prices represent the value of agricultural produce, these are compared with speculative values attributed to non-market goods like biodiversity. Using such a crude technique does not take into account the fact that market power diminishes farm gate prices to a level below the value which consumers place on their food, as well as ignoring the likely increases in food prices expected over the next 50 years.
14. Environmental benefits are also assumed to continue to be valued at the same rate into the future, despite the fact that individuals’ preferences are likely to change going forwards. In addition to this, no consideration is paid to the marginal value of an environmental good, for example the public will value an extra bird very highly if it is a rare species, but as the number of birds in the species rises, the value of an extra bird will diminish.

15. The resulting messages that farmers would be paid far more for services they provide to the nation’s ecosystems than for producing livestock and crops are very surprising (albeit we recognise the opportunity of co-delivering environmental and food goods from the same or adjoining land).

16. The NEA has been described by many of the authors as a starting point, with much more work required to make the numbers more robust. Further work needs to be undertaken to assess future food prices. This is an important piece of work that would help valuations in the future.

**What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?**

17. The White Paper announced targets to reduce the horticultural use of peat in the UK to zero by 2030. The UK Government is unique in having policies on peat reduction and as result UK growers already find themselves in an uncompetitive position, because they are using more expensive peat alternatives that their EU competitors, who are not required to use peat substitutes.

18. Government’s approach on peat reduction fails to grasp the economic and technical realities of peat reduction. By contrast, the Dutch Government is currently working on “Enhancing the sustainability of the peat supply chain for Dutch Horticulture”. This means securing long term availability of high quality and/or alternatives for the sector, while dealing appropriately with biodiversity issues and taking climate change into account.

**What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided?**

19. The NFU has long argued that one of the biggest challenges facing farmers and growers in England and Wales in the near future will be their part in meeting the expected global demands to produce more food, but also to have less of an impact on the environment.

20. As a result, we believe that one of the more significant actions in the White Paper is the commitment to bring together government, industry and environmental partners ‘to reconcile how we will achieve our goals of improving the environment and increasing food production’. Particularly significant is the explicit acknowledgement in the White Paper that food production will *increase*, but also that a number of different organisations will all be brought together to help find solutions.

21. In particular, investing in applied research and knowledge transfer and technologies are key.
   - We need to better understand and better manage the interactions between the impacts of climate change, our use of natural resources, wildlife species and habitats and food production.
• We need to develop technologies and new approaches to help meet the challenge of “sustainable intensification”. This includes precision farming, genetic improvement of both crops and livestock (including GM methods).

22. Peat offers technical and commercial advantages unmatched by any other single growing media substrate available in the UK at a competitive price. The NFU agrees that horticulture should continue to replace peat with more sustainable alternatives. However this will only be achieved if the technical and economic barriers to peat replacement are overcome. This requires Government to work closely with industry and other stakeholders to firstly develop an evidence-based policy, with realistic and sustainable peat reduction targets. The 2030 peat phase-out target is not supported by the available evidence.

23. It must be demonstrated that the supply of peat alternatives will meet the demand required to meet any reduction targets. Measures also need to be put in place to ensure that peat-reduced and peat-free growing media products supplied to the amateur sector are fit for purpose. Finally, retail sector attitudes must be changed to ensure that growers are lifted out of the current unsustainable position where they have been unable to pass-on the higher cost of peat alternatives to their retail customers and in-turn consumers. In a highly competitive market place, retailers have to date undervalued peat, and devalued peat alternatives by demanding price parity between peat-reduced products and peat itself.

How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

24. We need new mechanisms and streams of funding such as Payments for Ecosystem Services to help translate values of services into spending. There are some water companies that have taken the approach to minimise long term spending on water treatment by helping farmers and land managers to tackle the source of the problem by providing funds to help reduce diffuse pollution and runoff. For example, Upstream Thinking is an initiative being championed by South West Water and West Country Rivers Trust. Better management of soils, water and nutrients benefit yields as well as possible lower consumer bills.

25. The White Paper rightly identifies the need to produce an action plan, develop guidance and introduce a research fund to help expand these sorts of schemes. But, direct engagement and discussion with possible groups of business, from say the tourism sector or other sectors, about the possible opportunities and identification of the barriers are also key.

26. However, as we indicated in paragraphs 6-11 above, more work needs to be undertaken to develop the economic valuation models, and in particular future food prices.

Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

27. Farmers are already involved in a lot of positive work on engaging the public with the natural environment. For example, LEAF’s Open Farm Sunday attracted over 120,000 visitors to 362 open farms on June 12th 2011.

1 http://www.leafuk.org/resources/000/617/631/Press_release-Sixth_OFS_a_Success.pdf
28. The White Paper makes a number of references to eco-labels, including an action to ‘develop a UK negotiating position on the EU eco-label for food’. Environmental labelling is often mentioned as a useful tool in helping raise awareness and/or as an indicator of our environmental footprint to help inform consumers and to change buying behaviour. In short, we do not believe that labelling should be viewed as a panacea to communicate with consumers. Interim findings of a Defra research project on environmental labelling suggest that it is difficult to assess the effectiveness of any specific labelling scheme because it is hard to attribute cause and effect.

29. Whilst the focus of recent activity has been to present carbon labels to consumers, other environmental issues including biodiversity and water are also being looked at more closely.

30. It is our view that the label, and the calculations behind it, must be measurable and auditable. Only then can a labelling scheme be used. However, even if a universal scheme were agreed, applying to both imported and domestically produced food, it is difficult to imagine a quantitative label that captures all the environmental benefits (and costs) of a particular food production system. Currently, we do not believe that such a universal scheme and criteria exists and therefore do not support the use of environmental labelling in its current ad-hoc and unscientific form.

31. Therefore consideration should be given to alternatives such as point of sale material and supply chain initiatives.

26 September 2011
We welcome the Government’s Natural Environment White Paper and the inclusion of some commitments to improving the quality of our rivers and water bodies.

We support fully efforts to embed the value of ecosystems in decision-making and believe a key component of this is valuing water. Ensuring that we understand the value of this precious resource to people and the environment, at different times and in different places, will help drive sustainable behaviour and sustainable investment.

The creation of Nature Improvement Areas has the potential to lead to the restoration of ecosystems by encouraging partnership working. Without knowing the anticipated scale of the Areas, it is difficult to understand how they may work in practice, but we believe that water availability and quality is a key component. In some Areas where over-abstraction is a concern, it will be appropriate to work with the water companies. There may also be the opportunity to implement schemes that combine benefits, such as the catchment management schemes being piloted by several companies.

We are committed to fully exploring the potential for catchment management solutions as cost-effective and low-carbon solutions. We will be reviewing the operation of these schemes to ensure that customers receive value for money and that the companies manage the risks appropriately. We believe that in pioneering payment for ecosystem services in this area, we will have a valuable evidence base from which others may draw in the future.

It is right that efforts to comply with the Water Framework Directive are at the heart of future management of our water ecosystems. We agree with the Government that measures must be fair and sustainable, and believe that this should consider fairness to customers.

So far, the costs of compliance with the Water Framework Directive have fallen mainly on customers of the water and sewerage companies, but it is essential that in future these costs are shared fairly and not placed entirely on customers.

An important part of meeting the Water Framework Directive’s requirements will be tackling diffuse pollution and we are pleased that the White Paper outlines several specific measures. We look forward to seeing more detail on how these commitments to deal with agricultural pollution will be met, along with the new strategy for tackling non-agricultural diffuse pollution.

Finally, we welcome the commitment to reform the abstraction licence regime and the demonstration that the challenges facing our rivers and water bodies are serious.
It is important that solutions work both for the environment and customers, who may be required to pay for improvements. By considering the value water has, we can ensure that sustainable and innovative decisions are made, rather than simply focusing on investment, as 2.77 of this White Paper may imply.

As with most of the work to protect and enhance our water ecosystems, the Government has an opportunity to provide clarity on changes to the abstraction regime in the Water White Paper expected later this year. This is a significant opportunity to make lasting reforms that embed the value of water into decision-making by customers, the companies and economic and environmental regulators.

21 June 2011
Further written evidence submitted by Ofwat (NEWP 23A)

Introduction

1. We welcome the Government’s Natural Environment White Paper (NEWP) and the inclusion of some commitments to improving the quality of our rivers and water bodies. We are pleased to have the opportunity to contribute to the Select Committee’s inquiry.

2. Following publication of the Department for Environment, Food and Rural Affairs’ discussion document, ‘An Invitation to Shape the Nature of England’, we were invited to respond. A copy of this response, which provides a comprehensive overview of our thoughts in this area, can be found in appendix 1.

3. Following the publication of the NEWP, we submitted a response to the Environment, Food and Rural Affairs Committee’s initial call for evidence. As the NEWP contains only a limited number of specific commitments directly relevant to our work that submission should be considered our primary contribution.

4. In order to provide greater clarity on a number of the specific issues we have already raised, and reflect the progress of work within Ofwat, we have provided some further detail in this evidence. This focuses on the Water Framework Directive and diffuse pollution, catchment management and commitments for the Water White Paper.

5. As ever, we will be happy to provide the Committee with any further information on issues relating to the water and sewerage sectors that is required.

Water Framework Directive

6. The NEWP highlights the importance of tackling diffuse pollution and meeting our obligations under the EU Water Framework Directive (WFD).

7. As we have outlined in some considerable detail in our response to Defra’s discussion document (appendix 1), the costs of meeting WFD requirements have so far fallen mostly on water and sewerage customers. While we agree with the Government’s objective of meeting our international commitments, we consider that, in future, customers should not be required to fund improvements from which they do not benefit. Nor should they deal with the impact of pollution for which they are not responsible. With potentially very large costs involved in complying with WFD commitments, it is essential that water and sewerage customers are not seen as an easy source of funding.
8. With specific regard to diffuse pollution, last year’s National Audit Office report confirmed that such pollution – the bulk of which is of agricultural origin – has a major impact on water quality in England. We were therefore pleased to see the NEWP commitments to:

- targeted, risk-based enforcement (the need for which was stressed by the NAO);
- increasing the focus of CAP agri-environment payments on schemes to tackle diffuse pollution (and pressing for a higher proportion of CAP funds to go to agri-environment schemes);
- continuing the Catchment Sensitive Farming Initiative; and
- encouraging voluntary action by the farming community.

9. We look forward to seeing more detail about how these commitments will be met in due course, along with the new strategy for tackling non-agricultural diffuse pollution.

Catchment management

10. The NEWP makes reference to United Utilities' Sustainable Catchment Management Programme (SCaMP) as a case study demonstrating the potential for adopting a payment for ecosystems service approach. A number of other water companies are piloting similar schemes that focus on using incentives to encourage more sustainable behaviour by land managers in order to reduce treatment costs. There are also a number of other potential benefits involved, such as habitat restoration and carbon storage.

11. We have recently concluded a report into these schemes that is designed to further our understanding, outline the broad approach we will take and help companies when considering these types of schemes in the future. A copy of this report is attached as appendix 2.

12. In summary, the report acknowledges that upstream catchment management schemes could be a more environmentally sustainable way of ensuring good quality drinking water with a reduced impact on customers’ bills by tackling diffuse pollution at source. Early results suggest that some catchment management schemes are beginning to deliver benefits to customers, but there is not yet enough evidence overall to show that they always deliver better water quality at a lower treatment cost. As customers are currently paying for these schemes through their water bills it is important that clear benefits accrue to them in the form of reduced costs.

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13. When we set price limits in 2014, we anticipate that the water companies will propose new or continued catchment management approaches. We will expect them to have clear evidence that such schemes are likely to deliver benefits to their customers.

**Water White Paper**

14. We particularly welcome the commitments in the NEWP to announce changes to the abstraction regime in the Water White Paper. As we set out in our response to Defra’s discussion document, there is much to be done to restore sustainable abstraction and ensure that the value of water is understood more fully.

15. If as regulators, companies and customers we are to make sustainable choices, we need to properly understand the value of water in different locations and at different times. Understanding this value will help drive more sustainable investment decisions and may encourage the use of more innovative methods. It will also help establish the right balance between increasing supply and managing demand to ensure that we have enough water in the future.

16. Section 2.77 of the NEWP states that “the new regime will provide clearer signals to abstractors to make the necessary investments to meet water needs and protect ecosystem function”. It is important that any proposals take into account the impact of increased investment on customers’ bills and considers where innovation and better management of resources can lead to a reduction in spending, particularly on large, carbon-intensive, assets.

17. Understanding the value of water, and the ecosystem services that rely on good-quality fresh water in the right place and at the right time, is crucial to improving much of our natural environment. It is essential, when considering all the policy proposals in the NEWP – particularly those relating to whole areas or landscapes – that water is factored in as a critical component.

18. Although there is a need for these long-term reforms, in the short term we are exploring steps we can take in the price review to ensure sustainable use of water resources. When we have considered the appropriate mechanisms in this area we will be happy to brief the Committee further.

*3 October 2011*
Appendix 1: Ofwat’s response to the Department for Environment, Food and Rural Affairs discussion document ‘An Invitation to Shape the Nature of England’

Executive summary

We welcome the opportunity to respond to the discussion paper ‘An Invitation to Shape the Nature of England’ published by the Department for Environment, Food and Rural Affairs (Defra) in July 2010.

The forthcoming Natural Environment White Paper (NEWP) presents a great opportunity to set out a new, locally-based and deregulatory approach that delivers for the environment and for water customers. This can be carried forward through the Water White Paper and subsequent Bill.

We agree that our natural environment underpins our economic prosperity, our health and our wellbeing. This includes providing the sources of raw water crucial for our way of life.

We have already done much to ensure that the monopoly water and sewerage companies we regulate play their part in maintaining, and improving, the natural environment, at a price that customers can afford and are willing to pay.

But, a new set of challenges pose a significant threat to continued progress. These include:

- adapting to a changing and unpredictable climate (with the anticipated increase in extreme weather events putting more stress on water resources, drainage systems and infrastructure);
- reducing emissions to help mitigate climate change;
- population growth, particularly in south-east England where water is already scarce;
- changing consumer expectations (for example, for more tailored, bespoke arrangements, as in other sectors) and lifestyle changes;
- economic uncertainty, and the consequent affordability issues this raises; and
- further tightening of environmental standards, including those resulting from implementation of the EU Water Framework Directive.

These challenges are different in nature, scale and complexity from those of the past. They will make delivering sustainable water and sewerage services increasingly challenging. As a result, they may require a different set of responses and approaches from the wider water and sewerage sectors.
Our response focuses on key areas where we consider new thinking and more sustainable approaches are needed. The main points of our response are set out below.

An opportunity for change

- Water is both an essential part of the natural environment and a resource that is vital to our economy and our way of life. As such, it is crucial that we value it properly.

- But, at present, there are no mechanisms to reveal this, whether it be the value of:
  - keeping water in the environment;
  - the treated wastewater returned to the environment; or
  - water at stages in between.

- Exposing this value more clearly will drive:
  - more sustainable investment choices by the water companies and others;
  - more sustainable decisions on the location of water-intensive industries;
  - more sustainable decisions by water users; and
  - the development of markets for ecosystem services, involving local buyers and sellers of environmental goods.

- We agree that the challenges set out in the discussion paper are broadly in line with those we consider the most significant to ensuring a sustainable water cycle now, and in the long term. But, in particular, we would emphasise the need to:
  - take a proportionate and flexible approach to mitigating and adapting to climate change
  - tackle diffuse pollution;
  - meet the requirements of the Water Framework Directive (WFD) in a sustainable way.

Tackling the erosion of our natural value

- In terms of mitigating and adapting to climate change, we suggest:
  - developing low-carbon, sustainable solutions to water quality challenges;
– developing more sustainable planning, drainage and land management solutions to reduce the demand we place on drainage infrastructure and help avoid future ‘overflow’ pollution of the water environment;
– leaving the door open for rolling out smart metering and more joined up approaches to promoting both energy and water efficiency;
– ensuring that EU legislation takes climate change properly into account, for example by not requiring compliance with fixed discharge emission standards where the environmental impact of waste water discharges is low; and
– helping address unsustainable abstraction by using the value of water to incentivise bulk water trading and making the abstraction licensing system more flexible.

• In terms of tackling diffuse pollution, we suggest:

  – where the potential benefits to customers can be identified, encouraging joint working between the companies, farmers and landowners, and other stakeholders to improve upstream catchment management;
  – working jointly to identify which catchment management schemes are successful and promote good practice;
  – urgently developing well-targeted incentives to encourage land management practices which can address diffuse pollution at source – for example, by redirecting available agri-environment funding, and by focusing the Common Agricultural Policy (CAP) more generally on delivery of environmental goods;
  – providing effective information to farmers and land managers to boost awareness of the unintended environmental impact of their activities;
  – improving baseline regulation of existing environmental standards for farmers and land managers, for example through strengthening cross-compliance provisions under the CAP;
  – encouraging joint working with producers of agrochemicals and pharmaceuticals to improve products or guidance on their use

• In terms of the Water Framework Directive, we suggest:

  – ensuring fairer cost apportionment across sectors, in line with the ‘polluter pays’ principle, so that a disproportionate burden does not fall on water customers;
  – allowing for the development of proportionate and flexible catchment-scale approaches;
  – taking climate change fully into account, while accepting that some change is inevitable;
  – taking full advantage of the possibility of allowing exemptions on grounds of disproportionate cost;
– extending the disproportionate cost provision to other EU environmental legislation; and
– removing inconsistencies and barriers to optimum outcomes and efficient implementation, such as the ‘one-out all-out’ rule in defining good ecological status.

Building and enhancing our natural value

- There is much scope for using well-targeted incentives to encourage sustainable behaviour by all players within the water cycle.
- Catchment management, and other such schemes, have the opportunity to allow best practice to be shared and good behaviour to be rewarded. Some element of regulation and penalty will still be needed to control those who act unsustainably.
- With most consumers currently not metered, which contributes to a lack of understanding of the true value of water, it is important that we look at other ways that consumers can be encouraged into sustainable behaviour.
- Behavioural economics is one potential solution, as is a wider appreciation of the changing value of water as a commodity.
- As markets in ecosystem services develop, there will be scope to connect those who provide and maintain good quality water, with those who benefit from it. These markets can be linked in with the market forces in abstraction and water trading that we discuss elsewhere.
- The water and sewerage sectors have been encouraged into more sustainable behaviour. They are required to take a long-term approach and understand their role in our natural environment, taking a holistic view. There are lessons here for some other sectors.

1. Introduction


2. Safeguarding our natural environment is essential to our well-being. As well as being of great aesthetic value, it provides us with a wide range of vital goods and services on which our economy depends. This includes providing sources of raw water crucial for our way of life.

3. Water is a precious resource. We turn on the tap and we take it for granted that there will always be fresh, clean water for us to use, even though there is
less water available per head in many parts of England, including the south-east, than in southern Spain or Morocco. We rarely think about the impact on the environment of delivering clean water to our homes and businesses and taking away our wastewater for treatment.

4. Yet every day we take more than 35 billion litres of fresh water out of the environment, 15 billion litres of which is used for public water supplies. The remainder is used for power generation, agriculture, fish farming and other industrial uses.

1.1 The achievements we need to build on

5. We have already done much to ensure that the monopoly water and sewerage companies we regulate play their part in maintaining and improving the natural environment at a price that customers can afford and are willing to pay.

6. When the companies were privatised in 1989, some commentators considered the UK to be the “dirty man of Europe” because of our polluted beaches and rivers, and neglected water infrastructure. Poor water quality resulting from years of pollution meant some waterways were effectively lifeless.

7. But since then, the sectors have invested about £90 billion (in today’s prices) to improve services to consumers and the environment. This has enabled the companies to maintain, renew and improve their assets so that consumers can access safe and effective services while balancing and safeguarding the needs of the natural environment. They have specifically targeted about £30 billion of this investment on delivering environmental and water quality improvements. This has transformed the sectors’ environmental performance.

8. The capital required has largely been raised from investors, on the basis of continued revenue from customers’ bills, at no additional cost to taxpayers. While this means that bills have gone up as a result, our efficiency challenges have kept them about £110 lower than they would otherwise have been.

9. But it is important to bear in mind the real customer legitimacy issue that exists, when considering the share of environmental costs that fall to the water and sewerage sectors, as opposed to others across the economy.

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10. Over the past 21 years, the combination of the companies’ efforts and a balanced framework of economic and environmental regulation driven by extensive water legislation – much of it at a European level – have delivered tangible benefits for consumers and the environment.

11. This has included dramatic improvements in the quality of our water, from bathing waters, rivers and other surface waters to the water that comes out of the tap. In turn, this has benefited wildlife, landscape, leisure and amenity. It has also encouraged economic regeneration (particularly in the case of city centre waterfronts).

12. So, today, for example:

- 98.6% of bathing waters around England and Wales meet European Union (EU) standards for water quality (78% in 1990);
- more than 70% of English and some 90% of Welsh rivers are rated ‘good’ or ‘very good’ for water quality, representing 20 years of continuous improvement – our rivers have not been cleaner since the start of the Industrial Revolution;
- 119 beaches across England and Wales meet the Blue Flag standard, compared with 12 when the scheme was launched in 1987;
- 125 species of fish have been recorded in the River Thames, with record numbers of sea trout (there were none 50 years ago);
- record numbers of salmon and sea trout have been recorded in the Tyne this year (again, there were none 50 years ago);
- 99.95% of drinking water complies with tough EU standards;
- otters have returned to rivers in every English county, except Kent; and
- leakage levels have fallen by about 35% since their peak in the mid-1990s.

13. And there is more investment to come. As a result of our 2009 price review, the companies will invest a further £5.3 billion (including work on the Thames Tideway and associated projects) between now and 2015 to maintain and improve the environment and drinking water quality. This is far more expenditure to improve the environment than that made by any other sector.

14. Much of this investment is to comply with EU legislation such as the Water Framework Directive, as well as directives governing urban wastewater treatment, freshwater fish and bathing waters. Notably, it also includes nearly £400 million for schemes directly benefiting conservation and biodiversity, including some £340 million for schemes to implement the EU Habitats Directive.
1.2 New challenges requiring a new approach

15. While this situation is far from dire, a new set of challenges poses an incremental, but significant, threat to continued progress. These include:

- a changing and unpredictable climate, with the anticipated increase in extreme weather events putting more stress on water resources, drainage systems and infrastructure;
- a need to reduce emissions to help mitigate climate change;
- population growth, particularly in south-east England where water is already scarce;
- rising consumer expectations (such as for more tailored, bespoke arrangements, as in other sectors) and lifestyle changes;
- economic uncertainty and the consequent affordability issues this raises; and
- further tightening of environmental standards, including those resulting from implementation of the EU Water Framework Directive (WFD).

16. These challenges are different in nature, scale and complexity from those of the past. They will make delivering sustainable water and sewerage services increasingly challenging.

17. So, a new approach is needed if the sectors are going to be able to continue to respond efficiently and effectively to future pressures, and ensure the continuing availability of reliable supplies of safe drinking water and affordable water and sewerage services.

1.3 Value of water

18. We think there is an overarching need for mechanisms that properly reveal the value of water, reflecting both changes in external circumstances and expectations as to its future availability.

19. Revealing this value to decision-makers at all levels, and at all stages of water and sewerage service delivery, would help them to make more sustainable decisions. Centrally set (or ‘command and control’) approaches are artificial and unresponsive. They are also becoming increasingly difficult to sustain given future uncertainties such as climate change, population trends and the need for economic development.

20. So, revealing the value of water would influence decisions on:

- whether to respond to abstraction and other water supply pressures by trading water, introducing new demand management measures, tackling leakage or developing new resource capacity;
• options for grey water recycling, rainwater harvesting and other local collection and storage solutions (including finding sustainable ways to address the pollution caused by spills and overflows from sewerage networks, resulting from greater pressure on the drainage infrastructure because of the expected effects of climate change); and
• where to site new development.

21. Allied with this, we need to make sure that frameworks are flexible, risk-based and drive efficient responses by delivering effective signals and incentives to all players involved. Such an approach would encourage optimum solutions for consumers and the environment, for example through local catchment-level solutions and joint stakeholder working. The effect of this would be to balance cost and responsibility appropriately. It would also help to develop markets for ecosystem services.

22. We also think that specific action is necessary to:
• develop tools and mechanisms to tackle diffuse water pollution;
• take a shared, proportionate and flexible approach to implementing the WFD; and
• mitigate and adapt to climate change, including dealing with the anticipated pressures and uncertainty from abstraction to drainage.

23. We outline these in more detail, in response to the specific questions raised in the discussion paper.

24. Our responses focus on the water and sewerage sectors, their impact on the environment, and their role in improving that environment. We do not address questions we do not consider relevant to our role. And, in order to avoid unnecessary duplication, we have referred to previous answers in places.

2. An opportunity for change

Defra discussion paper Q1:
What do we need to do to embed the true value of our natural resources in decision-making at all levels?

25. The Defra discussion paper emphasises rightly, the link between the natural environment and our economic prosperity. Water is both a precious and essential part of the natural environment, and a resource that is vital to our economy and way of life. As such, it is essential that we value it appropriately.
26. But there are no mechanisms to reveal this value at present, whether it be the value of:

- keeping water in the environment;
- returning the treated wastewater returned to the environment; or
- the value of water at stages in between.

27. For example, there are no price signals to deter abstractors from over-abstracting.

28. So, as well as the impact on customers’ bills, any decisions the companies make on the water and sewerage services that they provide must reflect the value of water as a resource. This must take into account:

- the effect of taking water from the environment;
- the carbon impacts of providing clean supplies; and
- treating and disposing of used water.

29. If the value of water were exposed, it would drive the companies to make more sustainable investment choices. It would also encourage more sustainable decisions on the location of water-intensive industries, and more sustainable behaviour by water users, and by local buyers and sellers of environmental goods.

30. What we need are mechanisms that reveal the differing value of water in different locations over time, instead of relying on setting a static and artificial value of water centrally and factoring it into the decision-making process. This value would reflect changing external circumstances at a local level, and expectations of future availability.

31. Revealing the value of water in this way would avoid the danger of setting inappropriate targets that risk distorting investment decisions, and becoming irrelevant in the face of the uncertainty brought by factors such as our changing climate, population trends and development pressures.

32. The signals that these mechanisms would create would have added benefit, if coupled with other market reforms that allow the sectors to respond more flexibly. For example, more flexibility could be built into the frameworks governing trading of water abstraction licences, water entitlements and bulk water supplies.

33. This would benefit all water users (including other abstractors, such as farmers) as it would provide more options to access water when it is needed. It would also maximise the potential for moving it from places where it is in plentiful supply, to those where it is scarce.
34. Similarly, separating the retail function from other parts of the existing monopoly water companies would give the retailers the incentives to develop as water service providers. They could offer packages to customers to help them reduce their demand for water and, for industrial customers, their trade effluent.

35. The recent drought in north-west England highlighted the problems that arise when water becomes scarce – either at a point in time, as in this case, or over time as in the south-east. While a national water grid would be unfeasible, carbon intensive and very expensive, responsive mechanisms to reveal the value of water would encourage the companies to share and manage resources in more effective ways. This might allow investment to increase supply to be deferred, to the benefit of both consumers and the environment.

36. More specifically, revealing the value of water would influence a variety of decisions that the companies and consumers make every day, including:

- deciding whether to use water trading (for example, through interconnecting pipes) or to develop new resources as a means of reducing unsustainable abstraction and other water sourcing (and water quality) pressures;
- deciding whether to respond to supply pressures by introducing additional demand management measures (such as installing meters), tackling leakage, or building more resource capacity (particularly if carbon is properly taken into account);
- the best way to develop markets for ecosystem services by identifying and bringing together providers and beneficiaries of both good quality raw water and wastewater discharges;
- options for grey water recycling, rainwater harvesting and other local collection and storage solutions – which save carbon emissions associated with treatment, as well as costs, and for sustainable urban drainage solutions – which often have wildlife and amenity value;
- how to maximise the value of wastewater treatment and discharge – which could help with the development of options for catchment-scale permitting, and dynamic and flexible consenting of wastewater discharges, currently being investigated by a number of companies jointly with the Environment Agency;
- how to invest in solutions to reduce, or avoid, spills or overflows from the sewerage networks polluting valuable water resources; and
- where to site new development, bringing about a closer relationship between the scale of economic development at particular locations, available water and the capacity for managing run-off.
37. So, revealing the value of water would influence both upstream and downstream decisions. This would drive more efficient use of resources, and reduce environmental impacts throughout the sectors. At the same time, the way we regulate prices would protect household customers from unacceptable increases or fluctuations in the amount they pay for their water. We also need to consider how further to inform and help household consumers to use water more wisely.

Defra discussion paper Q2:
Have we identified the right overarching challenges for the White Paper to consider? If not, what should we focus on? How should we approach these challenges?

38. The challenges set out in the discussion paper are broadly in line with those that we consider to be the most significant to ensure sustainable water and sewerage services now and over the long term. In particular, we would emphasise the need to:

- tackle diffuse pollution, which does so much to hold back progress in our rivers and streams; and
- address the pressures associated with meeting the WFD in a sustainable way – one that does not unnecessarily impact on water customers’ bills or increase carbon emissions.

2.1 Tackling diffuse water pollution

39. In a recent study⁴ published in July 2010, the National Audit Office (NAO) estimated the cumulative cost of water pollution in England and Wales to be about £1.3 billion a year.

40. The NAO study suggested that diffuse water pollution is now the biggest challenge to improving water quality in England and Wales. According to the Environment Agency⁵, agriculture is the source of about two-thirds of the diffuse pollution in watercourses in England and Wales. It contributes about 60% of nitrates, 25% of phosphates and 75% of sediments⁶.

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41. The RSPB\(^7\) estimates that the costs of water pollution from agriculture are between £445 million and £872 million a year. Over the next five years, it will cost the companies £125 million in improved treatment capacity and processes, just to remove pesticides and nitrates in water. This is in addition to the £1.6 billion invested for this purpose since privatisation, and before energy and other operating costs are taken into account.

42. The impact of diffuse pollution on receiving waters means that water customers have to pay more both to make the water taken out of the environment fit to drink, and also to have their wastewater treated to a higher standard than normal so it can be returned to the environment. In fact, in some cases, discharges from sewage treatment works actually improve the quality of water in rivers.

43. While it is clear that the water and sewerage sectors have a role to play, we think that tools need to be developed to enable other sectors to play their part. This is so that water customers no longer bear a disproportionate amount of the cost of tackling this key challenge.

44. We need urgently to develop well-targeted incentives to encourage practices that can address diffuse pollution at source. As the NAO study stressed, we also need to improve baseline regulation of existing standards. This would deter those willing to ride roughshod over the efforts others have made.

45. Although other sources of diffuse pollution will have an impact (for example, - run-off from urban areas contributes about 14\%, contaminated sites and, residential housing about 4\% each, roads 3\% and industrial estates 2\%\(^8\)), it is clear that the problem will not be addressed unless it is possible to find ways to reduce its agricultural component.

2.2. Implementing the Water Framework Directive

46. It is essential that environmental and water quality legislation, much of it set at EU level, is implemented efficiently, effectively and fairly.

47. The WFD seeks to put the water environment in a wider context, and acknowledges costs and benefits for the first time. We welcome this. But in 2008, Defra estimated that the total cost of implementing it in the UK could be between £30 billion and £100 billion across all sectors by 2027.

48. This is a huge sum, particularly given current economic difficulties. So, it is essential that the WFD is implemented as fairly and as flexibly as possible,

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taking full advantage of the possibility of allowing exemptions on grounds of disproportionate cost.

49. The first round of River Basin Management Plans (RBMPs) under the WFD, covering the years 2010-15, focuses on putting in place monitoring programmes, investigations and intelligence gathering, to ensure that the right pollution pressures are addressed going forward.

50. We support the need to avoid unnecessary investment. But, we consider that the flawed way in which the WFD measures progress (the ‘one out, all out’ rule – see paragraphs 77-80) means that we are likely to see only a modest increase in the percentage of water courses in England and Wales meeting good ecological status (from 26% to 32%). Defra expects a further 2% increase because of additional local initiatives within the period.

51. At the same time, the Environment Agency expects the cost of compliance measures to rise significantly over the next two planning periods if we are to get close to meeting the WFD’s objective of good ecological status for our surface water bodies – or chemical status for groundwater – by the 2027 deadline.

52. This makes splitting costs fairly and a proportionate approach even more important. In the first cycle of RBMPs, the companies (and so their customers), are due to meet more than 82% of costs\(^9\). This is far in excess of their impact compared with other sectors. If the current approach is unchanged, water customers could face significant bill increases (with some estimates as high as 25%) for implementing the WFD in future cycles.

2.3 Adapting to and mitigating climate change

53. We also need to ensure that legislation – and its implementation – takes into account both the impact on carbon emissions, and the need to adapt to a changing climate.

54. Climate change is one of the biggest challenges we all face. It could have a significant and permanent impact on the water cycle. This would have major implications for the long-term sustainability of the water and sewerage sectors in England and Wales.

2.3.1 Climate change adaptation

55. Work we have carried out with the Met Office shows that the frequency of extreme daily rainfall events is likely to more than double by the 2040s. Given

this uncertainty, we must adopt a proportionate and risk-based approach, sharing the burden fairly between current and future water customers.

56. In this context, we need to be sure whether, in adapting to climate change, we are trying to protect and preserve the environment as it is today (making a static assumption), or planning for an environment that is evolving because of climate change that cannot be prevented. The latter clearly has lower cost implications than the former.

57. Climate change is likely to exacerbate existing problems, particularly in south-east England, where too much water is sometimes taken out of the environment through abstraction, causing damage to sensitive ecosystems, plants and wildlife.

58. Climate change is also likely to increase the pressures on drainage infrastructure, resulting in the need for further action to reduce or avoid pollution through spills and overflows from wastewater networks.

2.3.2 Climate change mitigation

59. There are clear links between water, energy and carbon. The water and sewerage sectors are currently responsible about 1.1% of UK greenhouse gas emissions, but this rises to 6% if the emissions related to water use are included (which accounts for about a quarter of all household energy use). So, the sectors will be expected to play their part in reaching the UK Government target of an 80% reduction in greenhouse gas emissions by 2050.

60. This means that it is important for the sectors to develop low-carbon, sustainable solutions to water quality challenges, such as working with land owners and managers on catchment management approaches.

61. Reducing the volume of water that individual consumers use can also help to reduce carbon emissions and abstraction pressures, as well as keeping costs for consumers down by reducing the investment needed in new resources.

62. Smart metering and the Green Deal could have a role here, and we think there could be significant benefits in rolling these out together for both energy and water use, where there is a sufficiently strong case to do so.

63. It is also important that EU legislation takes climate change properly into account. If this does not happen, water customers could end up paying for measures to comply with inflexible water quality standards governing local operations, that could have unintended and undesirable carbon consequences for the broader, global environment.
64. This is arguably already the case with the Urban Waste Water Treatment Directive, which requires compliance with fixed emission standards, irrespective of the environmental impact of wastewater discharges.

3. Tackling the erosion of our natural value

**Defra discussion document Q3:**

What are the existing policies and practices aimed at protecting England’s natural assets that currently work most effectively? What works less well?

3.1 Tackling diffuse water pollution

65. Diffuse pollution is now the biggest challenge to water quality in England and Wales. At present, the water companies use costly treatment processes to remove diffuse pollution from water supplies. Ultimately, it is customers that pay the costs of this through their bills, and we think this is neither fair nor sustainable.

66. The standard approach to dealing with pollution is to internalise the costs through the ‘polluter pays’ principle. Making those that cause the pollution pay for the costs of removing it incentivises them to minimise the pollution they cause. So, the principle is promoted widely in measures such as the WFD, and we support its pragmatic application.

67. In our view, all sectors need to play their part in tackling diffuse pollution in order to get the most economically efficient outcome for England and Wales as a whole.

68. Whilst there is no one all-encompassing solution, we think that much could be done through a combination of:

- the companies and others working with landowners and managers to improve upstream catchment management;
- better targeted incentives to landowners and managers to provide public environmental goods, for example through agri-environment schemes under the Common Agricultural Policy (CAP);
- better information to farmers to boost their awareness of the unintended environmental impact of some of their activities;
- tighter baseline conditions for receipt of public funds by farmers and landowners, properly enforced; and
- working with agrochemical and pharmaceutical manufacturers to improve either products, or their guidance on use.
69. One approach would be to focus more environmental stewardship schemes on water. Part-funded under Pillar 2 of the CAP, these schemes have traditionally targeted biodiversity and landscape improvements, rather than water quality.

70. The NAO study noted that while 70% of ‘entry level stewardship’ options taken up had the potential to improve water quality, less than 2% had water quality protection as their primary objective. The study concluded that the impact of voluntary incentives for tackling diffuse pollution had been modest and piecemeal.

71. That is not to say that there have not been some significant changes in agricultural practice over recent years, often driven by cost pressures. The NFU has recently quoted figures\(^{10}\) to suggest that there has been a 33% reduction in average nitrogen application, and a 66% reduction in average phosphorus application since 1987.

72. Yet serious problems persist. For example, 11% of designated ‘drinking water protected areas’ under the WFD in England and Wales are at risk of non-compliance because of pesticides\(^{11}\), with nitrates and colour also causing problems in some areas.

73. More recently, the environmental stewardship scheme has taken steps to place greater emphasis on resource protection, including water. This may have an effect, as may the Government-funded catchment sensitive farming initiative (despite NAO criticism of its effectiveness), and voluntary initiatives such as the campaign for the farmed environment, the voluntary initiative on pesticides and the NFU’s ‘tried and tested’ guidance on optimising nutrient use.

74. But, we think we need to rethink how farmers are incentivised to deliver public goods. We discuss this in more detail in paragraphs 117-120.

3.2 Implementing the Water Framework Directive

75. The WFD has introduced a legal framework for the sustainable management of water resources across Europe. Under its provisions, each Member State is expected to draw up management plans for its designated river basins. The RBMPs drawn up for England and Wales show the extent of the water quality, and quantity, pressures from a variety of sources.

Apportioned costs – first stage RBMPs

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\(^{11}\) ‘Annual report 2009-10’, The Voluntary Initiative (p7).
82.4% Water companies and customers  
12.9% Environment Agency  
3.5% HMG  
0.6% Angling and conservation bodies  
0.2% Industry  
0.2% Navigation and ports  
0.1% Agriculture

76. Although it may be easier for the companies to pass these costs on to their customers (and the companies have a good record of delivery), this is not consistent with either the ‘polluter pays’ principle approach, or current concerns about rising affordability problems for water bill payers. Neither does it address the environmental impact of the water pollution.

77. The way that good ecological status is defined under the WFD means that achieving compliance will be enormously expensive.

78. Many of the improvements to the more than 14,000 kilometres of water bodies provided for in the RBMPs will not count toward the good ecological status required under the WFD. This is because the criteria used to determine if a water body in a particular catchment achieves good ecological status reflect 37 water quality measures. These include the aquatic life found in the water, as well as the biological or chemical composition of the water at particular locations.

79. But using these criteria is not straightforward. For example, low levels of migratory fish in a particular catchment may be the result of physical barriers such as dams rather than water quality. Overfishing may also be a problem in certain areas.

80. As things stand, an individual catchment can meet almost all of the criteria for good ecological status, but still be classed as failing. Because a single failure against any indicator means the water body cannot be classified as ‘improved’. This has become known as the ‘one out, all out’ rule. According to the Environment Agency, a third of water bodies missed out on ‘good’ status by just one of the 37 indicators\(^\text{12}\).

81. To illustrate this, when the Environment Agency rated rivers in England on their chemical and biological water quality in 2009, more than 70% were classed as ‘fair’ or ‘better’. And yet, only 26% of those same rivers meet the good ecological status required under the WFD. Such conflicting messages are very unhelpful.

82. The WFD also works against efficient and effective measures in other ways. For example, the ‘no deterioration’ rule means that in theory it is not possible to improve ten water bodies from ‘poor’ to ‘good’, if it meant that one other water body in the catchment deteriorated from ‘excellent’ status to merely ‘good’.

83. This makes it more difficult to achieve strategic, flexible and lower-cost catchment-scale approaches. Instead of searching for the best approaches (such as allowing higher discharges at some works and lower ones at others, depending on where improvements could be made most cheaply), attention focuses on the measures necessary at each individual sewage treatment works.

84. The result is that costs increase and work (for example, to identify the scope for lower discharge requirements when the amount of water in the water course is high, thus diluting the effect of the discharge) is discouraged.

85. Strategic and flexible measures such as catchment permitting could ultimately apply across sectors. For example, in Chesapeake Bay in the USA, nutrient trading between sectors is being trialled to try to ensure the most cost-effective way of meeting water quality standards for nitrates and phosphorus.

3.3 Adapting to and mitigating climate change

3.3.1 Climate change adaptation

86. The UK is already well placed in its understanding of the likely impacts of climate change, thanks to the world-leading efforts of the Met Office and the UK Climate Impacts Programme (UKCIP).

87. But, a prerequisite of shifting responsibility for decisions from the state to businesses and civil society – as recommended by the Adaptation Sub-Committee in its recent report – is the need to work ever harder to ensure that information is accessible, and as easy to understand as possible. This applies equally to the need for data sharing on flood risk for resilience and catchment modelling for implementing the WFD.


14 ‘How well prepared is the UK for climate change?’ Adaptation Sub-Committee report, 2010.
88. WWF estimates that one-third of catchments are already at risk from unsustainable abstraction pressures15, with 15% classified as over-abstracted (that is, existing abstraction causes unacceptable damage to the environment at low flows) and 18% as over-licensed (that is, if licences were fully utilised there could be unacceptable damage at low flows). The combination of over-abstracted and over-licensed catchments exceeds 50% in some river basins.

89. WWF also estimates that current abstraction amounts to between 50% and 60% of licence ‘entitlement’, suggesting that the real impact of over-licensing is yet to be seen. WWF says that somewhere between 1.1 billion and 3.3 billion litres more water a day is taken out of rivers, and other water courses than the environment can sustain.

90. It considers a reduction in abstraction of between 5% and 15% would be necessary to return to a sustainable level of demand – or alternative supplies developed. Climate change is likely to add to these pressures.

91. As part of its restoring sustainable abstraction (RSA) programme, the Environment Agency is investigating about 320 cases of potential over-abstraction that could impact on important, ecological sites (see below). The aim is to address such problems through revoking or modifying licences, or other related measures. The RSA programme was established primarily to ensure compliance with the Habitats Directive, but the WFD could be a significant driver in the future.

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92. The problem is that water licences are like property rights, in that under the Water Act 2003, compensation has to be offered for any modifications or revocations that are not voluntary. Existing abstractors are meant to fund the compensation payments. But the system is under strain – the UK Government and Environment Agency lack the resources to finance modifications up front (in 2009, the Environment Agency estimated that the necessary RSA licence changes would cost £448 million for currently identified sites).

93. The result is a very laborious and inflexible system that struggles either to deal with the environmental challenge of unsustainable abstraction, or to make water available for users (such as farmers or new businesses). Even where licence entitlements are not currently taken.

94. Economic growth may also be constrained because water is allocated largely against historical need, and because there are significant barriers to trading in licences or water. The result is, water may not be getting to the users that value it most, and can generate greatest economic value from it, at a particular time.

95. There is a danger that water customers will be called upon to meet the costs of restoring sustainable abstraction, even though the companies (and their customers) will be already paying nearly £400 million for capital schemes to implement the EU Habitats Directive, the UK Biodiversity Action Plan and the Countryside and Rights of Way Act, between now and 2015.

### 3.3.2 Climate change mitigation
96. The WFD and other EU water quality legislation do not yet take the need to mitigate climate change properly into account. As a result, the plans for implementing the first phase of the WFD across England and Wales:

- do not place sufficient value on the costs of carbon emissions;
- exclude the need to cut emissions from impact assessments; and
- shift the responsibility for cutting emissions on to a few large sectors (including the water companies).

97. This results in tensions between ever-increasing quality standards, and efforts to reduce greenhouse gas emissions. Driving emissions upwards, through ever tighter treatment requirements, will mean that the companies will be further penalised under the Carbon Reduction Commitment.

98. We estimate that the carbon implications of the environmental and drinking water quality improvement programmes that the water companies are required to deliver between 2010 and 2015, largely driven by the demands of EU legislation, amount to:

- 1.6 million tonnes to build the infrastructure for enhanced treatment (‘embedded emissions’); and
- 180,000 tonnes every year to run them (‘operational emissions’).

99. This additional infrastructure is equivalent to an extra 450,000 cars on the road, and the operational emissions are equivalent to an additional 45,000 cars for every year the infrastructure is used.

100. Given the links between water, energy and carbon, we need to ensure we leave the door open for integrating smart metering across energy and water. Also, the Green Deal should fund financing for water savings (particularly hot water), as well as energy.

**Defra discussion document Q4:**

What mechanisms should we focus on to ensure we manage our natural systems more effectively in future? How should we define success?

101. There are a number of mechanisms, some reasonably well established and some just being explored, which can be implemented to manage water more effectively. These can generally be measured using outcome-based measures, although the cost of the inputs and processes, particularly on water customers, should always be considered.
3.4 Polluter pays principle

102. Although it is relatively straightforward to apply to point source pollution, the ‘polluter pays’ principle is harder to apply to diffuse pollution. One solution would be to tax agricultural inputs such as fertilisers and pesticides. But this approach does not discriminate between those that use these inputs responsibly, and those that do not.

103. There is also a tendency for such tools to lose sight of their original purpose in the wake of scientific and technical developments. For example, the development of fertilisers that impact less on the environment may actually be impeded by a blanket tax that has as its aim reduced fertiliser use, not reduced impact.

104. But under current arrangements, there is no incentive on those who are responsible for causing the pollution to consider alternative options. This means that pollution remains both upstream and downstream of the treatment works, where it continues to impact (often for some time) on the life that our rivers and streams can sustain.

105. Yet many of the actions that farmers and landowners in particular could take to minimise their contribution to diffuse pollution are quite simple and cheap to carry out. There are many examples of profitable farms that have taken action to reduce diffuse pollution by adopting good nutrient management practices and low-cost capital investments. The problem is that there are a small number of poor performers, whose actions reflect badly on the sector as a whole.

3.5 Catchment management

106. At the 2009 price review, we demonstrated our commitment to sustainability by supporting a range of catchment management initiatives that the companies proposed in their business plans for the next five years.

107. These involve the companies working with local farmers and landowners to investigate and address deteriorating raw water quality in the catchment, rather than pursuing traditional, capital-intensive treatment solutions.

108. Catchment management schemes can offer potential savings to customers by reducing the cost of treating water and wastewater. In addition to improving raw water quality, they can also offer long-term benefits. This includes:

- improved raw water quality;
- lower greenhouse gas emissions;
- enhanced carbon storage;
- improved biodiversity; and
• contributing to more stable river flows (flood protection).

109. Also, they often involve a collaborative, landscape scale, approach to problem-solving that involves all those who have an impact on the quality of the raw water sourced by water companies – which is more effective than each participant acting in isolation.

110. Catchment initiatives may be particularly suitable in areas where there is a specific and well-targeted problem, such as use of a particular pesticide. For example, several companies have detected metaldehyde (a widely used molluscide to combat slugs) in their raw water. While the levels at which it is being found do not constitute a danger to health, they do exceed regulatory standards. But, there is no cost-effective treatment process to remove metaldehyde currently available.

111. So, catchment management measures represent the only viable option at present. A stewardship group, involving manufacturers, the farming and growing communities, and water companies, is co-ordinating actions to this end.

112. It should be noted that catchment management schemes are long-term investments. They can take many years to deliver benefits. Inevitably, there is also a degree of uncertainty about whether they will actually deliver the benefits they are intended to achieve. This is mainly because they rely on the complexities of changing the behaviour of individuals and organisations within catchments, rather than more visible and predictable hard engineering solutions, such as treatment works.

113. The risk with these schemes is that water customers may end up paying for both the scheme and the end-of-pipe solution if they do not prove to be effective.

114. We think it is essential that the sectors learn lessons as quickly as possible so that those catchment management approaches that are most successful in reducing diffuse pollution, meeting environmental standards, reducing emissions and delivering benefits to water customers can be confirmed and promoted.

115. We would expect the companies to propose more cost-beneficial catchment schemes at the next price review. In cases where real customer benefits warrant it, the companies may wish to explore the possibilities for directly incentivising better practices themselves. One company has already considered subsidising a farmer to not use a specific pesticide because it is difficult to treat at the downstream treatment works.
116. Given the uncertainties, our support for catchment management at the 2009 price review represented something of a leap of faith for Ofwat. But, the expectation that these schemes would act as a catalyst for other catchment stakeholders (such as land managers and highway authorities) to contribute to the sustainable solutions that are needed, reinforced our support. The companies and their customers cannot be expected to solve this problem alone.

3.6 Targeted incentives for land managers and others

117. In our view we need to rethink how farmers are incentivised to deliver public goods, to effect the real change needed. We think there should be a significant increase in the proportion of available agri-environment funding, under the CAP, that is spent on natural resource protection, such as improving and protecting water quality and water resource management through, for example, enhanced buffer strips and improved manure storage.

118. In particular, we consider that land managers could be offered better incentives to reward them for the delivery of public environmental goods, such as an improved water environment, over and above the legitimate demands of the statutory and regulatory baseline.

119. The reform of the CAP in 2013 could be an opportunity to improve the coherence between EU policy objectives for water (WFD), climate change and agriculture. It could develop both better incentives for farmers to improve the water environment, and strengthen the requirements for ‘cross compliance’, which are the basic minimum standards that farmers must meet to be eligible to receive their area-based payments under the CAP.

120. CAP reform could also be an opportunity to strengthen Pillar 2 (support to rural communities and environmental protection and conservation measures, currently responsible for about 20% of CAP spending), at the expense of Pillar 1 (direct payments to farmers, currently responsible for some 70% of CAP spending). This would reflect the fact that EU spending directly on the environment currently represents a fraction of spending on agriculture.

3.7 Better information, regulation and enforcement

121. Experience on the ground suggests that many farmers and land managers are keen to engage in good practice when the impact of their activities is clearly presented to them. Self-monitoring has proved a useful tool in this regard. Defra’s demonstration test catchments project\(^\text{16}\) may help provide

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\(^{16}\) ‘New research project to tackle water pollution from agriculture’, Defra press release, 28 September 2010.
compelling evidence as to what can be achieved when farmers adopt good practice.

122. While effective incentives and information must be part of the solution, so too are effective regulatory sanctions where poor land management practices persist. The NAO study was clear that such sanctions are lacking in England and Wales, drawing attention to poorly co-ordinated regulation and the lack of progress on the designation of water protection zones. Ultimately, as in other sectors, a regulatory stick is needed to deal with persistently poor practice.

123. Regulation does not have to be burdensome or complicated. Fixed penalty notices and other civil sanctions could be used. One option might be to consider formalising voluntary codes of practice under general binding rules to tackle diffuse pollution, as in Scotland. This would provide a clear basis for taking further enforcement action, if advice and awareness raising did not have the desired result.

124. We would like to see the framework for good agricultural and environmental condition (GAEC) extended, under Pillar 1 of the CAP, to cover the protection and management of water resources. This would require sufficient resources to be put into monitoring and enforcement. But this may largely be a matter of improving co-ordination.

125. We set our more details of our position in ‘Ofwat’s response to the European Commission’s public debate on the future of the Common Agricultural Policy’, which we published in June 2010.

126. We would also like to see more progress towards the establishment of water protection zones under the WFD, where drinking water supplies are under particular threat. Even designating candidate zones could drive the necessary behaviour change voluntarily.

127. There are many exciting technological and knowledge-based developments within agriculture (such as ‘precision farming’ and advanced livestock nutrient products). These should help to both reduce diffuse pollution, and increase the profitability of the farms over the long term. But there are still some poor performers that have not yet taken the basic, low-cost measures necessary to protect the water environment.

128. Regulation is being introduced to tackle some non-agricultural forms of diffuse water pollution. One example is the ban on inorganic phosphates in domestic laundry cleaning products, which will come in to force in 2015. Measures to address misconnections could usefully be included in the Water Bill that is expected to follow the Water White Paper. We also need measures to deal with run off from highways and urban areas.
129. Given the constraints on public funding and the difficult economic climate, it may be worth having considering once more the potential role of producer responsibility in tackling diffuse pollution.

130. For example, the agrochemical sector could contribute to the funding of the catchment sensitive farming initiative and risk assessments for products. The pharmaceuticals industry could also take more responsibility for endocrine-disruptors. Under the current system, water customers are paying for the clean-up costs (and suffering from a poorer environment) irrespective of their personal choice of products used.

3.8 Balancing outcomes

131. We agree that it is important to measure progress towards a cleaner environment rigorously. We also think it is important to focus effort and resources on finding solutions in areas where the greatest problems remain. But, we consider that the current way of measuring performance against the WFD is misleading and can lead to unnecessary efforts and wasted resources, including water customers’ money.

132. If future WFD costs are to be controlled, a light touch will be needed for the cost-effectiveness work on priority substances arising from the chemicals investigations (including substances in wastewater discharges) currently under way.

133. In the past, such work has been very resource intensive and has resulted in over-designed and unnecessarily expensive implementation. Practical rules of thumb need to be established for deciding between options such as end-of-pipe treatment, restrictions on marketing or use/control of trader consents, in accordance with the 'polluter pays' principle wherever possible.

134. While we welcome the clause in the WFD that allows measures to improve the quality of the water environment to be postponed if the cost is 'disproportionate', we would like to see it applied to all investment to implement EU environmental legislation.

135. Despite the disproportionate cost clause, the inflexibilities inherent in the WFD tend to make it more problematic and 'absolute' than other Directives. The impact of the clause is too often trumped by other EU environmental drivers for schemes that do not have such a provision.

136. Our work at the 2009 price review revealed that much of the non-WFD investment required to meet EU environmental standards delivers benefits that are outweighed by their costs, particularly when carbon is taken into account (see below). This is despite our cost challenges.
137. In fact, some drivers (like the Freshwater Fish Directive) have costs that are almost three times bigger than the benefits the schemes will deliver. As the table below shows, on average every pound spent delivers only 30p of benefits. This is an average figure that obscures the fact that individual schemes had costs hundred of times greater than benefits. Yet because they are statutory schemes, we ultimately had no choice but to include them in our price limits.

Cost-benefit analysis of companies’ schemes to deliver EU Directives

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<tbody>
<tr>
<td>Number of schemes by companies</td>
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<td>60</td>
<td>98</td>
<td>77</td>
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<tr>
<td>Present value of benefits (£m)</td>
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<td>372.47</td>
<td>659.52</td>
<td>850.57</td>
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<tr>
<td>Present value of costs (£m)</td>
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<td>442.47</td>
<td>377.91</td>
<td>850.61</td>
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<tr>
<td>Net present value (benefits minus costs) (£m)</td>
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<td>-70.00</td>
<td>281.61</td>
<td>-0.04</td>
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<tr>
<td>Ratio of benefits to costs</td>
<td>0.35</td>
<td>0.84</td>
<td>1.75</td>
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Note: Costs/benefits are present value and so do not correspond to capital expenditure supported at the 2009 price review.

138. There are apparently no calls in Europe to extend the deadline for achieving good ecological status. This is surprising given the expected cost of implementing the WFD, the number of Member States that are struggling to make the progress required, and the current economic climate. Such an extension could be dependent on satisfactory direction of travel and adoption of a risk-based approach, under which those rivers most in need of improvement and protection are tackled first.

3.9 Sustainable abstraction

139. We consider that we need to work towards mechanisms to reveal the true value of water, at a particular location, at a particular time, if we are to maximise sustainable use along the value chain.
140. At present, water users – the companies and their customers, or farmers and other industries – do not receive the right information about the value of the water they use. The amount they are charged for using the water taken out of the environment bears little relation to how little water there is in a particular area. In fact, it can cost more to abstract water from areas where it is plentiful than where it is scarce.

141. We are working with Defra, the Welsh Assembly Government and the Environment Agency to explore what other actions can be taken over the short, medium and long term to move towards a more sustainable water abstraction system. In particular, we have been working with the Environment Agency to develop a market for trading the rights to abstract raw water, as well as increasing trading of bulk water, where environmentally appropriate.

142. In ‘Harnessing upstream markets – what’s to play for?’, which we published in March 2010, we included our findings from a desk-top study that suggested that savings of almost £1 billion over 30 years could be achieved by moving water from areas of surplus to areas of scarcity, through interconnecting pipes, in addition to significant environmental benefits. If the value of water reflected its scarcity value, the savings from interconnections would become even more significant.

143. A more detailed study found that an approach involving more resource sharing in south-east England could lead to savings of £501 million by 2035, compared with the £762 million cost of the water resource schemes identified in the companies’ draft water resource management plans.

144. This shows the benefits that could ensue if the companies and other interested parties were to receive clearer signals to inform their decisions about how to meet water demand, whether through innovation, trade or investment.

145. Water trading and abstraction licence trading could contribute to tackling over-abstraction. It could also reduce the need to develop new water resources, which carries its own environmental cost (although the interconnecting pipes and pumping costs would have a carbon cost to take into account). Interconnections could also help provide increased resilience to extreme weather events and other emergencies.

146. A true value for water, reflecting its actual and predicted scarcity, would impact on the economic level of leakage and the viability (and popularity) of

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water efficiency schemes. It would also encourage alternative collection and storage schemes (such as rainwater harvesting) and grey water recycling. And help us to comply with the WFD’s requirement that water pricing policies provide adequate incentives for users to use water resources efficiently.

147. We consider that a future Water Bill would represent a good opportunity to provide the legal basis for reform of the current abstraction system. We think we need to go beyond the idea of time-limiting licences as they come up for renewal, about which the previous Government consulted.

148. At a minimum, a Bill could provide for reverse auctions to buy back abstraction licence entitlements. It could also:

- encourage the introduction of ‘use it or lose it’ provisions to prevent licence holders retaining licences even though they do not use their entitlements; and
- establish clarity over the parameters for determining water availability now, and best estimates regarding future availability, taking into account the impact of climate change.

149. There is also a lack of clarity over how much water is required for the environment in the future. This is complicated further by the fact that the environment that we are protecting is also evolving because of climate change. These issues act as a block to exposing the long-term value of water.

150. Revealing the current and future scarcity values for water would, along with greater clarity over the property rights conferred by abstraction licences, provide a platform for market-based measures that would encourage efficient trading of licences, water entitlements or bulk supplies of water. These market-based allocative mechanisms would also allow more flexible responses to periods of below-average rainfall.

3.10 Market mechanisms

151. The development of markets could help address the problems of both over-abstraction and climate change. This would require identification of areas where subsidies or income streams could evolve into market-based mechanisms to deliver both climate change mitigation and adaptation, and environmental improvements. An example would be incentivising farmers to manage their catchments in such a way as to reduce flood risk, or to create carbon sinks through forestry.

152. Carbon trading already takes place through the European Union Emissions Trading Scheme (EU-ETS). But this only covers 40% of the EU’s emissions,
and in the UK there are a number of other schemes to incentivise carbon reductions.

153. These schemes have a variety of carbon prices associated with them – for example, about £13 per tonne of carbon dioxide equivalent (CO₂e) in the carbon reduction commitment to more than £100 per tonne in the renewable heat incentive. The development of ecosystems services would be encouraged if there were a single, and strong, carbon price.

4. Building and enhancing our natural value

Defra discussion document Q6:
What best practice and innovative approaches to protecting and enhancing our natural environment do you think should be considered as we develop the White Paper?

154. Please see our response to questions three and four in chapter three.

Defra discussion document Q7:
How best can we harness and build on public enthusiasm for the natural environment so people can help improve it through local action, as informed consumers or by shaping policy?

155. One of the biggest positive impacts that water users can have on the natural environment is to reduce the volume they waste.

156. If consumers used less water, then there would be less need to take it out of the environment (as well as reducing the associated infrastructure to treat, store and transport it). This would have substantial benefits for the natural environment, and for reducing carbon emissions, in those parts of the country where water is already scarce.

157. There are a number of issues that prevent this ‘consumer-led’ change from occurring. One of these is the way the customer pays. For example:

- 63% of households in England and Wales do not have a water meter – they pay a flat annual fee regardless of the volume of water they use; and
• even in areas where the level of metering is relatively high, the price that customers pay does not reflect its real value at different times.

158. This means that many water customers receive no – or very limited – signals about the value of the water they use, and there is little incentive to use it more efficiently.

159. So, this is why we are, among other things:

• considering the case for increasing the rate of metering;
• reviewing approaches to charging to see if different arrangements can send better signals about the real cost of water supply;
• looking at what drives consumer choice and behaviour in addition to price; and
• looking at the role that separating the retail function of existing monopoly water companies from other parts of their business could play in helping customers to reduce their water use.

160. The way in which people react to market signals, including price, and to other factors (such as regulatory incentives and obligations) may be a long way from what we would expect. Behavioural economics could expose more information about the way consumers and businesses make decisions.

161. A better understanding of this field would allow us to explore ways to ‘nudge’ people into more responsible and sustainable behaviour. We also hope to use behavioural economics to bring insights into how participants in the market will respond to information and influences, to ensure that our regulation is effective and efficient.

162. We are also exploring opportunities for closer working with the energy sector, including the roll out of smart meters and through the Government’s Green Deal.

163. We explore some of these issues further in ‘Waste not, want not – making the best use of our water’, which we published in June 2010, and ‘Valuing water – how upstream markets could deliver for consumers and the environment’, which we published in July 2010.

164. We also recommend that, while there are powerful economic and social arguments for favouring approaches that support consumer choice, there is also a role for the UK Government to mandate changes that will help consumers become more water efficient should they wish to do so.

165. For example, regulations have limited toilets to a six-litre flush when 7.5 litres used to be normal. Measures of this kind have little, if any bearing, on
consumers’ experience, so they have no material impact on personal freedoms. Yet they can make a valuable contribution to using water wisely.

166. Making sure that customers understand what they are paying for in their bills, particularly in terms of environmental improvements going forward, will be an essential part of future customer engagement. We are currently exploring ways that customers can become more central in the decision-making process.

Defra discussion document Q9:
How best can Government incentivise innovative and effective action on the natural environment, across England, at the local level?

167. Please see ‘Catchment management’ (page 24) and ‘Targeted incentives for land managers and others’ (page 26).

Defra discussion document Q10:
How best could the economy reflect the true value of nature’s services in the way business is done, to drive smarter, greener growth?

168. We think it is important to develop mechanisms to reveal the true value of water at specific locations at specific times.

169. More needs to be done to develop markets for ecosystem services, whereby those that provide environmental services (such as good quality raw water or wastewater) are put in contact with beneficiaries. Farmers and land managers could come into the former category, and water companies, anglers or surfers, for example, into the latter.

170. As the RSPB\textsuperscript{18} has identified, the Government could encourage the development of payment for ecosystem services approaches by:

- increasing the evidence base for the private benefits of ecosystem services, which may encourage private markets to emerge;
- creating metrics to measure services, for example carbon sequestration;
- mediating the development by funding benefits that do not accrue to the business; and
- regulating to establish upper use limits on natural resources such as bodies of water, setting a cap on their use.

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171. As the potential actions to mitigate and adapt to climate change and improve the environment are many, varied and localised, there is significant scope for markets to help delivery by informing those decisions and therefore setting the right incentives to change behaviour. Clearly, such markets would be deregulatory in nature, rather than centralised command and control.

172. In the absence of competition within the sectors that enables water customers to indicate their preferences, we seek to ensure that the services customers are being asked to pay genuinely reflect what they need and want when we set price limits. This means that the companies must take customers’ views into account when they make their business decisions. We are currently reviewing how we do this.

Defra discussion document Q11:

Responsible businesses are already looking for ways to reduce their impact on the environment. How can we encourage more action like this?

173. At the 2009 price review, we required every water company to produce a 25-year strategic direction statement. In this way, we encouraged the companies to take a long-term view of their business and the environment. The companies’ strategic direction statements explored the challenges they considered they would face in terms of resources, taking into account, regional population growth or the effects of climate change.

174. The Government also requires the companies to produce a 25-year water resources management plan that specifically sets out their plans for water resources in their supply area.

175. We consider that both of these developments have been a positive step in helping the companies understand their obligations to explore their long-term impact on the environment – although the interaction between the two needs to be kept under review.

177. As part of their efforts to improve the quality of the raw water they treat, and improve the natural environment, many companies are taking forward plans to help reduce pollution of water courses, including through the previously discussed catchment management programmes.

178. Businesses need to understand their impact on the whole landscape. Damage to the natural environment is not just felt at the point at which a pollution incident occurs, deforestation takes place or water is over abstracted. The wider impacts can also last years, sometime decades.
179. There is already a duty on the companies to promote water efficiency to both household and non-household customers. Many offer subsidised or free water efficient fittings. Others offer free water audits for businesses to advise them on how to reduce the volume of water they use. It is this type of corporate social responsibility that can help businesses join up their expertise to help in protecting the natural environment.

180. By becoming more water efficient, every business can reduce its impact on the natural environment. This includes reducing the amount of water that needs to be abstracted from rivers and lakes. In addition by using less water, less of it will need to be treated and pumped, which are carbon intensive processes.

Defra discussion document Q15:

If you could choose just one priority action for the NEWP to drive forward locally, nationally or internationally – what would it be?

181. To develop mechanisms and processes for revealing the value of water.

182. Our vision is for sustainable water, and we would like to see an approach that maximises welfare to water customers and delivers for the environment. Key to this is ensuring that resources are allocated in the most efficient way so costs can be minimised, whilst creating the greatest benefits for society and the environment. In achieving this goal we will need to incentivise innovation and to adapt to the future in a flexible way.
Appendix 2: Ofwat’s report on catchment management

The CLA welcomes the publication of the Natural Environment White Paper (NEWP); as it accurately summarises the range of environmental challenges being faced. However, the scale of solutions suggested are small compared to the challenges enumerated and documented in the National Ecosystem Assessment (NEA).

The scale of the challenge

The NEWP correctly emphasises that natural capital and many ecosystem services are subject to large scale, pervasive market failure. Resultantly, they are grossly underestimated and under-delivered. This must be addressed.

The paper fails to make the case for a national commitment to fund the maintenance and enhancement of natural capital in future, such as by devoting 0.5% of annual GDP towards the goal.

The most straightforward way of doing so is through the CAP. However, this will require a significant redeployment of existing CAP resources which should not be reduced.

We note that other sources of funding may become available, and we are particularly sympathetic to the proposals on biodiversity offsetting. Yet, we suspect the contributions they will make are at best marginal.

Nature Improvement Areas (NIAs) and National Character Area Profiles

The thinking behind NIAs is to be supported; although we have two concerns. Firstly, they must not make the planning system more cumbersome than it already is. Land managers will not buy into something primarily seen as a nuisance to development (the same applies to Green Area Designations). Secondly, important environmental and cultural heritage features outside of NIAs could be lost if future funding sources (including HLS) are solely focused on NIAs.

In a similar vein, NCAs must not be used to prevent change in the countryside. Land based businesses need to be able to evolve to meet changing circumstances.

Local Nature Partnerships (LNPs) and Natural Value Ambassadors (NVAs)

A number of new institutions are proposed although the need for them (and their relationship with existing bodies) is unclear. How is it proposed that LNPs relate to existing Local Nature Forums and BAP partnerships? Furthermore, what will an NVA actually do?

In any event, land managers, as the providers of environmental goods, must be properly represented on these bodies.

Natural Resource Management

Much of what is said is a restatement of existing policy. Nevertheless initiatives such as research into soil degradation and the catchment area pilots looking at multiple benefits are to be supported.

It is particularly important that we increase the focus on the ways in which water use can be made more efficient.
Access, Recreation and Tourism

Recreational opportunities in the countryside need to be improved, through freeing up businesses to meet identified demand, such as through reforming the planning system. Moreover, when the opportunity is based on a public good, such as the public rights of way network, this must be supported by Government, not by impositions on landowners.

21 June 2011
Further written evidence submitted by the Country Land and Business Association (CLA)  
(NEWP 24A)

Question 1  
What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

Valuing ‘natural capital’

1. One of the fundamental issues that the Natural Environment White Paper (NEWP) acknowledges and which must be addressed in order to grow a green economy is that natural capital and its associated environmental services are subject to large scale, pervasive market failure. Private businesses, citizens and the Government have tended to underestimate the importance of our natural capital which has led to its depletion. Until natural capital and its associated services are properly valued we will be unable to effectively address many of the environmental challenges we face today. Internalising these values means that someone in the economy has to pay for them.

2. Whilst we agree that the issues highlighted by the NEWP are complex and that their resolution will require a variety of actions from across society, the scale of the challenge to stabilise and increase our stock of natural capital is not matched by discussion about the public and private resources needed to pay for their delivery. In addition there appears to be a lack of understanding regarding the important trade-offs made by land managers who must balance the costs of managing natural capital against current and alternative land use, and the resources they have available to deliver sustainable land management.

3. The NEWP has failed to make the case for a national commitment to fund this work in the future such as annually devoting, we would say, up to 0.5 percent of GDP towards the goal. Until society accepts that we will also have to raise resources collectively to pay for public environmental services just as we are prepared to tax ourselves to enable payment for public health and public educational services, then we will continue to see natural capital depreciation.

National Ecosystem Assessment

4. The CLA were pleased to see the commitment from Government to continue building on the National Ecosystem Assessment (NEA). This is an important piece of work which shows how our decisions can have an impact (both positive and negative) on the delivery of ecosystem services. The NEA also demonstrates the trade-offs between the different ecosystem services and the impact of our decisions, particularly between food and other services. It is essential that society understands these trade-offs and that our natural capital is properly valued to enable investment in it to be stabilised, maintained and enhanced.
5. The work from the NEA and commitments to publish new supplementary guidance to HM’s Treasury’s Green Book will help increase our understanding about valuing and consequently financing future delivery of our natural capital.

**Grant Schemes**

6. Over 80 percent of England is managed under agricultural or forestry businesses¹. Such businesses are dependent on natural capital but the management of land for the production of environmental goods and services has a cost attached. Many rural businesses are paid for some of the management they undertake through the Environmental Stewardship and England Woodland Grant Schemes. Many reports have highlighted the importance of these schemes for delivering environmental goods and services. It was therefore disappointing that the Government reduced the planned spending on the Higher Level Stewardship (HLS) scheme by 20 percent per annum until the end of the current programme in 2013.

**Common Agricultural Policy (CAP)**

7. The CLA were pleased to see the Government’s commitment to move the future Common Agricultural Policy (CAP) towards our own long argued goal of achieving Food and Environmental Security. However we would question how the required levels of ecosystem services are to be delivered by devoting a ‘greater share of a smaller CAP budget’? Unless the resources deployed increase in absolute terms we will not be able to deliver an increase in ecosystem services. Indeed a report by the Land Use Policy Group (2009) highlighted that agri-environment schemes within England would require an annual budget of £1,258 million in order to meet all of our environmental objectives from land².

**New Environmental Markets**

8. The NEWP proposals concerning new markets for ecosystem services whereby beneficiaries pay the provider could be an important mechanism for securing private investment. The Ecosystem Markets Taskforce must be innovative to identify future opportunities to pay for and secure increased ‘green goods and services’. It is vital that the land-based sector is represented on the taskforce to reflect that these services are land-based. It will be the land managers who will respond to the induced ‘market’. Similarly ‘Biodiversity Offsetting’ could offer a new income stream for the rural economy but significantly more work needs to be undertaken to enable private landowners to become involved.

**Question 2**

*Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?*

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Nature Improvement Areas

9. ‘Landscape scale’ collaborative working is not a new concept and indeed a number of existing grant schemes such as the Catchment Sensitive Farming Delivery Initiative are based on this principle. Initiatives such as the West Cambridgeshire Hundreds project were started by landowners who funded a Landscape and Conservation master-plan to determine what their local priorities should be. Unlike many other landscape projects, the landowners took the decision to have a ‘fuzzy’ project boundary in order that land managers would have people at hand to offer support which has led to the initiative spanning more than 10,000 hectares. It also has community involvement.

10. The proposals for NIAs offered the potential to build on the experience of existing initiatives and to empower land managers to take collaborative action to address a number of environmental challenges. Unfortunately the Government’s decision to underpin NIAs through the planning system has resulted in them appearing burdensome and restrictive and could lead to economic development in rural areas being stifled. It is unclear why the Government has taken this approach when existing landscape scale projects have been proven to work well without it. As a result of this decision it is likely that land managers would rather participate in projects outside of an NIA.

11. The interaction between the proposed NIAs with Local Green Area designations and the ‘Community Right to Buy/Bid’ proposals in the Localism Bill are also of considerable concern to the CLA. Landowners could create important habitats as part of their contribution to the NIA and then find their private property rights eroded by local communities designating these features as part of a NIMBY stance already seen through ‘Village Greens’.

12. In terms of financing the management needed to achieve the objectives of the NIA, the CLA were extremely concerned to see proposals within the NEWP Impact Assessment to target HLS funding to NIAs. Many ‘high priority’ habitats, heritage features and areas important for natural resource protection will occur outside of NIAs (as identified through HLS target maps) and it is vital that funding continues to be made available to manage them. It is essential that successful NIA bids identify innovative sources of funding to pay for the management within the NIA.

Local Nature Partnerships (LNPs)

13. The role of LNPs is unclear and they appear unaccountable for the public funding received. Rather than building upon the existing local partnerships and ensuring positive management is delivered on the ground, LNPs instead have a haphazard list of objectives which seem to duplicate effort being undertaken through other local partnerships such as Nature Improvement Areas (NIAs).

14. The CLA believe that LNPs must facilitate action and work with those who manage the land to ensure that national/international commitments are achieved through action
at a local level. It is imperative that LNPs should have land manager representation on them as often it is land based solutions that are needed to address local environmental challenges. It is completely right that LNPs should not focus solely on biodiversity but should seek to find join-up between environmental agendas and ensure that land managers receive consistent advice at a local level.

15. It is essential that LNPs should be required to liaise with central governance groups overseeing our international/national commitments. This will ensure that we are able to deliver against our commitments and enable LNPs to identify and report policy blockages and remove them. Currently LNPs do not need to report progress against any of the challenges they address. However with targets within the NEWP to increase the extent of priority habitats by at least 200,000 hectares, and commitments through the Water Framework Directive to improve our water quality, the CLA questions how the government will know whether LNPs have been successful or whether we have met our targets without a LNP reporting requirement.

16. The CLA also believes greater clarity is required about the role of Natural Value Ambassadors.

**Question 3**
What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambitions to fully embed the value of nature into policy delivery?

17. As mentioned previously the further extension of the NEA work is welcomed.

18. The CLA also believe that it is important to test and pilot new approaches such as that proposed for biodiversity offsetting, NIAs and the outcome focussed approach of Environmental Stewardship.

19. There is a wealth of research and evidence that highlights different techniques that can be used to help address a number of environmental challenges. We would however, again highlight that without sufficient resources the depletion of natural capital will continue as land has competing (and sometimes complementary) uses and ultimately will be used as the market dictates.

**Question 4 – not response.**

**Question 5**
What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

20. In order for land to be used to deliver an increase in environmental goods and services, there is a need for Government to provide incentives and change policy signals to make it happen.
21. The rural land sector is unique compared with other sectors of the economy, namely in that rural land managers produce major positive environmental goods including the creation and maintenance of habitats, landscapes and protecting natural resources. Land managers have the capacity to take actions to mitigate or reduce the negative effects of the environment caused elsewhere, for example the adoption of land management practices that increase the absorption of carbon in the soil and trees.

22. These demands for increased environmental goods and services from land will only be achieved through profitable business activity. Whilst the ‘value of services’ helps to highlight the importance of the environment for our continued well-being, ultimately it will be the financial resources available through private (such as through environmental markets) and public means that will result in an accumulation of natural capital.

**Question 6**

**Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?**

23. The NEWP suggests that there is a disconnect between people and nature which can be remedied by the provision of yet more access. If that were true, then the considerable increase in public access to the countryside over the last ten years (most notably, the provision of open access under CROW) should have reversed this trend. The fact is that research by organisations such as Natural England shows that re-engagement of the public with the environment needs to be focused and targeted – as, for example, through measures such as the Access to Nature scheme.

24. Evidence suggests there has been an ongoing decline in visits to the countryside whilst the desire and need for access to the natural environment in urban areas has increased\(^3\). The Government’s supporting evidence with regard to Natural Capital and the NEWP has highlighted that “Engagement is more likely when initiatives address both environmental and social needs”\(^4\).

**Proposals for re-engagement**

25. The CLA feel that the Government has missed an opportunity to make real changes that would benefit people’s access to the countryside while also improving the Public Rights of Way (PRoW) system.

26. To achieve improved access to the countryside and a PRoW system which meets the needs of local people, the Government needs to look at removing much of the needless complexity surrounding PRoWs. Highway Authorities, Local Access Forums and Rights of Way Improvement plans are constrained by existing legislation which

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\(^3\) *The Monitor of Engagement with the Natural Environment (MENE)*. (2010). Natural England.

prevents commonsense solutions. For example, where there is a difference between the walked route and the definitive map, and the landowner is content with the route walked, Highway Authorities should be encouraged to modify the map to reflect the walked route and DEFRA should encourage a pragmatic approach to be taken to enable these small technical changes to be made. Similarly sections 118ZA and 119ZA from the CROW Act 2000 have not yet been commenced which means that many local authorities refuse to consider landowner applications to divert an existing right of way from a farmyard or livestock area although for safety and privacy reasons such a change would be desirable for both those using the route and also for the landowner.

27. The CLA believes it is regrettable that permissive access was removed from HLS since this offered the scope to provide increased access to the countryside for all, based on where local communities wanted and needed it the most.

28. Environmental visits to farms (including ‘Open Farm Sunday’) continue to be welcomed by the CLA as they provide the opportunity for visitors to learn about and experience the countryside. The CLA believe that commercial access opportunities must not be overlooked since these provide families with an opportunity to engage with the countryside through activities such as mountain biking and guided walks.

13 September 2011
1. The National Trust welcomes the White Paper and we are keen to help achieve its aspirations. It sets out an ambitious vision for the future of nature, is appropriately broad in scope, and firmly repositions nature as central to economic prosperity and people’s quality of life.

Elements which are supported

2. We support much of the NEWP. We particularly welcome the commitment that we should be the first generation to leave the natural environment in a better state than we inherited it, and the vital concept of moving from a net loss of nature to a net gain. The National Ecosystems Assessment (NEA) provides an essential foundation to meet these goals.

3. We welcome the proposed Nature Improvement Areas (NIAs), although more than 12 will be needed to restore nature on any significant scale. An open and transparent process for agreeing the criteria for NIAs will be essential. NIAs should be focussed where there are the greatest opportunities for restoring natural capital and securing social benefits. They should be a material consideration in planning.

4. We also support proposals for Local Nature Partnerships (LNPs). They should have a broad definition, take an holistic approach to land and be resourced adequately: the £1m seed funding is likely to be insufficient. It is vital that the LNPs operate in parity with Local Enterprise Partnerships (LEPs). We suggest that access to further public funding by either LNPs or LEPs should be contingent upon their joint agreement.

Areas where improvement needed

5. Delivery of NEWP will require effective action across Government. One of the key tests is how the National Planning Policy Framework (NPPF) supports NEWP, especially the development of coherent and resilient ecological networks. The detail is yet to be published by DCLG, but it is concerning the Government has made it clear that economic growth will be the top priority of the forthcoming NPPF.

6. Whilst we warmly welcome the recognition of the vital role that nature can play in health and education, we feel the measures and commitments in these areas are inadequate.

7. The biggest challenge to NEWP delivery is the significant funding gap between aspiration and reality. In addition to better use of existing funding like agri-environment schemes, new funding streams from the public, private and voluntary sectors are needed urgently. The NEA is a great platform for this innovation and we’d strongly support the important work of the Ecosystem Markets Task Force.
8. The initial £7.5m funding for NIAs will be insufficient, but it is also vital that NIAs do not draw in too much funding from elsewhere, as this risks creating a two-tier countryside.

Omissions

9. The huge potential contribution of farming and the Common Agricultural Policy to deliver ecosystem services barely features. Allied to this, NEWP does not include a framework for enabling strategic and integrated land use decisions, to support the NPPF and to help target public funding and regulation for restoration.

21 June 2011
Further written evidence submitted by the National Trust (NEWP 25A)

1. The National Trust welcomed the publication of the Natural Environment White Paper (NEWP). It sets out an ambitious vision for the future of nature, is appropriately broad in scope, and firmly repositions nature as central to economic and social interests.

What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

2. Partnership working will be essential for delivery across the White Paper’s agenda. This needs to include a broad spectrum of Government Departments and agencies, businesses and civil society organisations. However, we are concerned that NEWP has yet to gain traction beyond the traditional natural environment sector, and that implementation thus far has fostered a climate of competition which risks inhibiting collaboration.

3. We are also concerned that the ambitious narrative set out within NEWP is not being reflected in other areas of Government policy. Indeed, the tone of the CAP negotiations and planning reform proposals seem contrary to NEWP. This is sending very mixed messages to business and civil society and risks undermining confidence in the commitments within the NEWP.

Green economy

4. The end goal must be for business and the natural environment to be in a symbiotic relationship, such that when business grows, nature benefits. Business is excellent at innovating towards a goal – but the correct goal for nature must be identified and stated explicitly by Government.

5. The results of the National Ecosystem Assessment should be used to develop tools and methods for taking the full value of ecosystem services into account, building this into key decision making processes at local, national and international levels.

6. The use of environmental markets is an important element of this, requiring a long-term view supported by a coherent, sustainable national policy framework. We believe it will be necessary for Government to take a stronger lead in developing and requiring mechanisms which capture the externalities of business activity.

Reconnect people with nature

7. To realise the potential to transform national wellbeing through reconnecting people and nature, we need a radically different approach from Government, civil society and business. While the White Paper gives welcome recognition of the
vital role that nature can play in health and education, we feel the measures and commitments in these areas are inadequate.

8. Reconnection requires a change in thinking from us all:
   – to see access to nature as a ‘service’ to improve people’s quality of life as well as a source of enjoyment and inspiration
   – to make access to nature easy and a normal part of everyday life
   – to understand that effective service provision will only be achieved by mutually supportive partnership working between Government, civil society and business.

Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective?

9. Delivery of NEWP will require effective action across Government, but thus far NEWP seems to have gained little traction beyond Defra. The National Planning Policy Framework (NPPF) is a good example of this. In promoting economic interests above all others, the NPPF fails to recognise the role of a healthy natural environment in good growth. In fact, it seems to fly in the face of the principles of environment and economy being mutually supportive that are espoused in the NEWP and fundamental to the NEA.

Nature Improvement Areas

10. We welcome the proposed Nature Improvement Areas (NIAs), although more than 12 will be needed to restore nature on any significant scale. Our main concern is that they are being rushed through, and should come after and be a focus for LNPs; short-listing NIAs first is the wrong way round.

11. An open and transparent process for choosing the NIAs will be essential. NIAs should be focussed where there are the greatest opportunities for restoring natural capital and securing social benefits, and therefore we believe there should be a presumption against NIAs which are dominated by existing protected sites. They should be a material consideration in planning. We are concerned that too many resources will be targeted at these areas effectively ‘starving’ the other areas, and Defra should be clearer about the implications for non-NIAs.

Local Nature Partnerships

12. We also support proposals for Local Nature Partnerships (LNPs). They should have a broad definition, take an holistic approach to land and be resourced adequately. Characteristics of a good Local Nature Partnership would include:
   – a coherent identifiable landscape area that is meaningful to the public;
   – a simple purpose or vision for the project which local people can relate to;
− partnership working, including landowners, agencies and other local interests;
− a focus on dynamic processes, including climate change, and the management of sites or assets within their wider landscape context;
− an integrated approach to environmental, social and economic land functions, based on wise use of assets, goods and services;
− an ambition to strengthen the resilience over the long term of systems and services provided by land, e.g. through improved ecological connectivity and working over a larger scale;
− an agreed set of measurable objectives amongst the partners to deliver the purpose (though objectives may change over time through improved knowledge).

13. LNPs should facilitate the duty to co-operate, and therefore we suggest either DCLG should be their sponsoring Department, or there should be joint sponsorship by Defra and DCLG.

14. It is vital that a principle of complementarity between LNPs and Local Enterprise Partnerships (LEPs) is established. We suggest that access to further public funding by either LNPs or LEPs should be contingent upon their joint agreement, and that there is either a degree of overlapping membership or ‘observer’ status for representatives required at each others’ meetings.

15. We are aware that a wide range of proposals for LNPs are currently being developed. There is a risk that existing fora (such as LBAPs) simply become LNPs without sufficiently extending their membership or function to reflect NEWP. There is a need for an institutional framework to bring partners together. While the capacity-building fund from Defra will help, we suggest that County Councils might also play a role in facilitating LNP formation.

16. We would also highlight the advantages of having private sector involvement from key ‘actors’ in the ecosystem world – water companies; food retailers; agricultural producers; etc – in the LNPs to help facilitate more projects like Moors for the Future which has brought resources and mutual ecosystem/cost benefit as a result.

Does the proposed Natural Capital Committee have sufficient powers?

17. It is unclear what powers the Natural Capital Committee will have. It is also unclear how the assessment of natural capital in the UK Environmental Accounts will be used, and who is accountable for them. We suggest that the Chancellor should be accountable and that targets for nature net gain should be established, alongside thresholds/environmental limits, triggering action if and when they are exceeded.
18. We suggest the Committee should provide an Annual Report to Parliament on progress against these targets and on NIA/LNP success. This would mirror climate change reporting duties held by the Committee on Climate Change under the Climate Change Act (2008).

What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

19. We don’t believe further research is needed at this stage. The National Ecosystem Assessment is a fantastic resource, and the priority should be to interpret and communicate these results. Local Nature Partnerships could organise workshops on how to use the results.

20. Work is also needed to integrate the National Ecosystem Assessment findings with existing financial support schemes, for example, on how ecosystem assessment/services can become integrated into RDPE/Pillar 2 measures and options.

What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?

21. We would question whether further evidence is needed, and certainly wouldn’t want this to hold up implementation. There is abundant experience of things like biodiversity offsetting and businesses valuing ecosystem services. The priority is pushing development and adoption of mechanisms that are suited to our situation in England.

What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

22. The biggest challenge to NEWP delivery is the significant funding gap between aspiration and reality. In addition to better use of existing funding like agri-environment schemes, new funding streams from the public, private and voluntary sectors are needed urgently.

23. Creation of new market mechanisms will be key. The National Ecosystem Assessment is a great platform for this innovation and we’d strongly support the important work of the Ecosystem Markets Task Force.

24. The initial £7.5m funding for NIAs will be insufficient, but it is also vital that NIAs do not draw in too much funding from elsewhere, as this risks creating a two-tier countryside.
Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

25. Whilst we warmly welcome the recognition of the vital role that nature can play in national wellbeing, we feel the measures and commitments in this area are only a first step and are inadequate to re-engage the public.

26. Effective re-engagement requires access to the natural environment to be seen as a social issue, not an environmental one. Many of the opportunities to achieve breakthroughs lie in the social policy sphere, particularly health and education. NEWP starts to make these connections, but lacks detail in how this potential will be realised.

27. NEWP identifies important goals in enabling children to learn outdoors, to harness the power of the Natural Health Service and empowering communities to improve and participate in their local environment. The major Government reform programmes in health, education and planning should be addressing the barriers to achieving these goals. We would urge the Committee to ask the relevant Departments what are their specific plans and programmes. More detail is provided in Annex 1.

Other

28. It is regrettable that Defra is dropping the biodiversity targets for species and habitats, as whilst not all of these have been effective, many have driven action and fostered commitment.

29. We are concerned that the new structures proposed for biodiversity are just as complex as previous ones, keep us at arm’s length from Government policy and do not seem to express the Government’s commitment to empower civil society.

30. The conservation of our geological heritage is almost entirely missing from the NEWP and we are in danger of overlooking this vitally important asset.
Annex One – Reconnecting People and Nature

Breakthroughs in three crucial areas are needed:

1. enabling every child to learn outdoors
2. facilitating effective use of the ‘Natural’ Health Service
3. empowering communities to improve and participate in their local environment

1. Enable every child to learn outdoors

Despite proven benefits, research\(^1\) has shown a contraction in childhood experiences, with fewer opportunities for children to have first-hand experience of nature than previous generations. Attitudes to risk in our society are one cause of this, and the findings of Lord Young’s report on health and safety\(^2\) are welcome. However, recent research\(^3\) found that schools are not prioritising out of classroom learning primarily due to local issues such as teacher confidence, competence and capacity. Another barrier identified was lack of easy access for teachers to coherent and effective local ‘services’ for learning outside the classroom in natural environments.

The Schools White Paper\(^4\) places teachers at the heart of school improvement. Though appropriate training, guidance, CPD and support, teachers should be more confident to run outdoor visits and activities as an integral part of their teaching in any subject. One of the main challenges is to reach teachers at schools in deprived areas, where children are the among the least likely to have the opportunity to connect with the natural world, yet are most likely to gain from the transformative impact outdoor learning has for many young people.

To address these barriers to learning outdoors, \textit{Natural Connections} has recently been established – a partnership of all the leading voluntary and public bodies from the natural environment sector who provide out of classroom learning services to schools, facilitated by Natural England. The aim is to deliver a coordinated local service to schools and teachers, to enable 75% of school children to learn outdoors.

Big Society initiatives like \textit{Natural Connections} thrive on the passion, expertise and commitment of the voluntary sector, but they don’t run themselves. To enable every child to learn outdoors, Government leadership and championing is also required, with effective integration and profile of outdoor learning within schools policy, seed funding for Big Society initiatives, and recognition and reward for schools through performance management systems like OFSTED.

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\(^3\) Kings College London Report to Natural England, 2010. \textit{Beyond Barriers to learning outside the classroom in natural environments}.
\(^4\) Department for Education, 2010. \textit{The Importance of Teaching}.
2. Facilitate effective use of the ‘Natural’ Health Service

There are already a number of innovative projects and programmes on green exercise that bring together at a local level GP surgeries, Primary Care Trusts, health and social care charities with greenspace providers\(^5\). The National Trust facilitates a number of these, and interest in them is growing all the time. While these tend to be very localised with patchy coverage, they demonstrate that the potential exists for every community to benefit from green exercise services on their doorstep. The most advanced national programme is \textit{Walking for Health}\(^6\), currently facilitated by Natural England, which has been running for over ten years and offers 600 local schemes that improve the health of 66,000 regular walkers nationwide.

There is considerable scope to grow these initiatives and mainstream green exercise into local healthcare provision. The proposed new role for local authorities in joining up local service providers to meet community health and wellbeing needs will help facilitate participation and enable a Big Society approach. However, to realise the potential for a universally accessible, green exercise ‘prescription’, free at the point of delivery, the Government’s leadership role is vital in raising the profile of green exercise across the health, local government and environment sectors to liberate local innovation, partnerships and investment in green exercise services. It would also help to grow public confidence that green exercise prescriptions can be as effective as drugs in preventing and treating many physical and mental health conditions.

3. Empower local communities to improve and participate in their environment

There are huge opportunities through the Natural Environment White Paper, Localism Bill and planning reform to empower local communities to improve their environment. To facilitate this, the Government needs to:

- develop a national strategic framework for land to facilitate an integrated approach, establish ambition and inspire local action
- reform the planning system to include adequate means (incentives, expertise, and spatially expressed ambition) to enable local neighbourhoods to ‘choose nature’ and take pride in contributing to national ambitions through local schemes
- ensure the planning reforms require developments to incorporate appropriate and adequate areas of greenspace for both nature and people.
- use the new designation to protect green areas of particular importance to local communities to help reconnect people and nature, and target areas of greatest need to provide fair access to nature to all.

26 September 2011

\(^5\) Faculty of Public Health, in association with Natural England, 2010. \textit{Great Outdoors: How Our Natural Health Service Uses Green Space To Improve Wellbeing}

Written evidence submitted by Water UK (NEWP 26)

Introduction

The Natural Environment White Paper, "The Natural Choice" provides an innovative framework which will help to begin the process of placing a value on the many public goods - good water quality among them - that our environment provides.

The water industry has been at the forefront of developing partnerships with farmers and conservation groups to help provide water quality benefits for both customers and the environment. We are pleased that this work is recognised by the White Paper, and was mentioned specifically by the Secretary of State in her speech to launch the document.

The industry looks forward to working with government, regulators and other partners on the proposals that the White Paper sets out.

Specific points

1. We look forward to working with the Government in developing a strategy to identify and address the most significant diffuse sources of water pollution from non-agricultural sources. (2.71)

2. We welcome the commitment to review older directives and applying the principles of better regulation to new legislation. We believe there is scope to bring directives such as the Urban Waste Water Treatment Directive up to date by the inclusion of more developed disproportionate cost tests.

3. Water companies will be working with Defra and the Environment Agency on establishing ten catchment-level partnerships to develop and implement plans for creating and maintaining healthy water bodies. (2.73)

4. The industry has been involved in helping the process of catchment management farming. Some companies have found that the catchment sensitive farming model (CSF) has brought enormous benefits. Companies have discovered it takes time, resources and an open mind to make a strong case which has community support, but the rewards have been great. CSF is, however, not perfect. It cannot be applied to certain, specific parts of the country and the regulations on grants are sometimes inflexible. But the industry, with its place at the heart of the natural
environment, is well placed to advise on a better model. Companies are also aware of the need to develop new guidance on river basin management planning, and are working with regulators and Defra to this end. We would point out, however, that the current application of the Water Framework Directive puts a heavy burden on the water industry. According to the RSPB, using Defra figures, the water industry bears 82.4% of the costs; agriculture and land management bears 0.1%. We need to restore the balance. This is an issue we need to address in the next phase of WFD. If it remains unaddressed until phase 3, the emphasis will switch to end of pipe solutions. We would be happy to work with the Environment Agency on what we see as this increasingly urgent and time sensitive issue. (2.75)

5. We are currently working with Defra and regulators to consider ways of reforming the abstraction regime. (2.77)

6. We look forward to the forthcoming Water White Paper which will consider ways to encourage the retrofit of SuDS (2.82)

7. Whilst we all agree the value of water is huge, we would welcome a more robust and flexible mechanism for calculating what that value is in order to ensure that future schemes, for example for catchment management, are working from a basis upon which all parties can agree. Expressing the true value of water as a monetary value may ultimately be unachievable and we would encourage policy makers to consider both monetised and non-monetised benefits. Through their abstraction and discharge activities, water companies inevitably have an impact on the biodiversity of the aquatic environment. In planning existing activities, and managing future ones, it is critical both to understand the totality of this impact and to be able to value it appropriately. In this way, companies can recognise biodiversity impacts in their decision making and seek both to limit any adverse impact and, where possible, enhance biodiversity - where the benefit of doing so both outweighs the cost, has the support of our regulators, and is affordable to the customer. In the industry’s blueprint for policy action “Meeting Future Challenges”, we say: “Companies and regulators need to ensure a measured pace to improvements with a focus on the issues that matter to customers, so that prices remain acceptable.” We support the principle behind valuing the full suite of services the environment provides and eagerly await the forthcoming guidance on how to measure these components. However we remain concerned there is much work to be done before the value of the environment can be accurately valued with a high degree of risk that this new approach could lead to wildly misleading assessments until it is fully
developed. The need for agreed tools and methodologies is critical to this area. (3.7)

8. We will be interested to see the results of the Natural Capital Committee’s work. The Efra Select Committee may wish to explore the proposed membership, the policy framework within which it will operate, the level of staffing and the importance that will be given to the work of the Natural Capital Committee within Government.(3.11)

9. We are pleased to see that the Government has recognised the work done by water companies through catchment management initiatives which provide multiple benefits for the consumer and for the environment. However, there must be a demonstrable business benefit from environmental improvements, which stacks up against the cost, and which must be cost-effective to the customer. Many companies spend time and resources talking to local communities and engaging in wider society – for example, the Water for Wildlife project. The last price review demonstrated customers’ desire for environmental improvements, and we are aware of the importance and value of talking to local action groups; however, we need to get the balance right between their concerns and the needs of the wider consumer base within the strategic context of water company operations. (3.25 and 3.26)

10. We support the Government’s proposals on CAP reform. We support these farming reforms but would like to see more specific reference to water quality improvement outcomes being included in Stewardship schemes as well as biodiversity outcomes. Our support for catchment control and other source control initiatives is dependent upon agreement from the economic regulator, Ofwat, to include such schemes within price limits. We believe that, if farmers are helped strategically and financially to achieve good quality water, air and soil, a host of benefits will follow, to the environment, to agriculture and to wider communities – in terms of, for example, increased flood resilience. The Efra Select Committee may wish to explore how feasible a flexible Pillar 2 may be in the face of possible future financial constraints.(5.20)

21 June 2011
Defra's Natural Environment White Paper 'The Natural Choice' provides an innovative framework which will help to begin the process of placing a value on the many public goods - good water quality among them - that our environment provides.

The water industry has been at the forefront of developing partnerships with farmers and conservation groups to help provide water quality benefits for both customers and the environment. We are pleased that this work is recognised by the White Paper, and that it was mentioned specifically by the Secretary of State in her speech at the launch of the document in June.

The industry looks forward to working with government, regulators and other partners on the proposals set out in the Natural Environment White Paper. Water UK – which represents all UK water and wastewater service suppliers at national and European level - is pleased to give evidence to the Efra Select Committee.

1. **What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?**

   Ofwat has been supportive of sustainable catchment management projects where companies made the case for them in the 2009 Price Review (PR09). Companies are undertaking projects and investigations at present and will be making the case for additional ones to regulators and Ofwat for PR14. Given customer support and proof of cost benefit, the industry is working towards a framework for robust assessment of catchment management with Defra, Ofwat and the Environment Agency.

2. **Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?**

   The Committee may like to consider the impact NIA will have, given that it, and other proposals, involve rationing very limited funds. We understand that the NIA process is expecting 200 bids for just 12 awards. So there is only a 6% success rate, for a £600K award over three years. Some companies are participating. Others are supporting but not leading a NIA proposal, as they prefer to focus effort on direct delivery of larger and more accessible funding.

3. **What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?**
No further evidence or research is needed before embarking on catchment management programmes – although we are putting good levels of effort into measuring the benefits of the changes – and there are many, particularly for biodiversity, carbon and other aspects in the Natural Environment White Paper (NEWP).

4. **What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?**

There are many international examples of successful catchment management known to most practitioners and since before 2000, three successful projects in the South West of England have been independently appraised for their extensive benefits and provision of a wide range of valuable ecosystem services. We can provide these details on request.

5. **What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?**

Resources can be provided in the context of water industry action to maintain affordable and sufficient water supplies, particularly in response to any current over-abstraction evidence or for future global warming effects. Current capitalisation of the projects allows, in the case of one water company, for a 5p addition to customers bills to generate £1m for catchment restoration. Overheads are minimal and far less than the overheads associated with any funds raised through UK or EU taxation. Valuation of individual ecosystem services is at present in the UK very theoretical. We prefer to focus on water provision (quality, peak control in storms and flow maintenance in droughts) as the primary and most easily valued ecosystem service; other such as biodiversity, landscape value, sustainable food production, tourism and recreation, carbon capture and storage etc can all be associated with the water protection actions. This avoids the problems and impracticality of identifying beneficiaries, providers and establishing a fair market mechanism for each ecosystem services.

6. **Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?**

We are pleased the Government has recognised the water industry as one of the sectors at the forefront of providing ecosystem services, and developing innovative solutions, working with the natural environment, to provide tangible customer and public benefits – for example, increased water quality,
greater flood resilience, and reduced sedimentation of reservoirs. The White Paper went some way to recognising the extent of the industry’s ability to deliver most of the NEWP aims. We believe the efficiency and value of delivery of NEWP, through direct water industry action which is either underway or planned, has been clearly demonstrated. We also recognise that, in landscape of reduced resources, the agencies with responsibility for the wider environment and its protection or improvement will need to seek partnerships across sectors, to undertake what the NEWP seeks to achieve.

27 September 2011
The Ramblers welcomes the opportunity to comment on the Natural Environment White Paper, and in particular to highlight the way that Government has failed to fully recognise the vital role that leisure, access and recreation play in facilitating the public’s understanding and enjoyment of the natural environment. Leisure and recreation in the natural environment are clearly hugely popular, as shown by the response to the proposals for the public forest estate.

Any key elements in the White Paper which are supported

- The commitment to restoring the natural environment.
- The linkage of people to nature, and the stress on the importance of fostering a better understanding of environmental issues amongst the population.
- The National Ecosystem Assessment, which places a value on all the benefits derived from our natural environment – including ‘cultural services’ such as leisure, access and recreation.

Any particular sections which could be improved

- Sections 4.33 to 4.36 could be improved by greater emphasis on the important role played by local authorities, most of whom have deprioritised this work in the face of budget cuts.
- These sections could also be improved by a more overt recognition that it is through statutory access (rights of way and open access land) that most people gain access to the natural environment.
- The role suggested for Local Access Forums and Rights of Way Improvement Plans, in improving and extending the network, cannot be delivered as things currently stand. Most Local Access Forums are ineffective, and Rights of Way Improvement Plans are generally unfunded.
- With regard to section 4.34, Defra should make clear that any changes to the processes for recording and making changes to public rights of way will be taken forward in the spirit of consensus fostered in Natural England’s Stakeholder Working Group.
- Sections 4.39 to 4.44 make no mention of the barriers that exist to effective volunteering, such as regulatory burdens and over-cautious health and safety and insurance requirements. There is also a need for sufficient professional staff in local authorities to coordinate volunteering effort.

Any omissions from the White Paper which Defra should rectify

- Any sense of vision for improvements to statutory access, in particular access to the coast and the completion of the English Coastal Route.
- Recognition of the importance of outdoor recreation in new landscape designations.
- A commitment to ensure that all public rights of way are properly recorded, open and easy to use.
- A commitment to the long-term protection for public access to publicly-owned land, and dedication of access land where this does not yet exist.
- A desire to see local authorities take access and recreation seriously, including the employment of sufficient professional staff.
• A clear statement on the link between leisure and recreation in the natural environment with other agendas such as health and well-being.

21 June 2011
Further written evidence submitted by The Ramblers (NEWP 27A)

Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

1. The Ramblers welcomes the opportunity to comment again on the Natural Environment White Paper.

2. We support many of the ambitions in the White Paper, such as the commitment to restoring our natural environment and to strengthen the connections between people and nature, but we are not convinced that these commitments will translate into action which delivers the public’s freedom to enjoy and understand the natural environment. The NEWP does not offer sufficient support for existing access opportunities and oddly, is completely silent as to the implementation of coastal access in England under the Marine and Coastal Access Act. We believe this omission provides a clear indication of the Government’s lack of commitment and understanding of the value of public access.

3. If the Government is indeed committed to ensuring that ‘everyone should have fair access to a good quality natural environment’, it must promote and increase opportunities for access to the countryside and support local authorities and other bodies in the delivery of public access.

4. Public rights of way are the main means by which people access the countryside close to where they live. The Government must commit to ensuring that all rights of way are recorded, open and easy to use, as required by law. It is essential that local authorities receive the funding and support they need to be able to maintain and promote the rights of way network. We welcome the proposals to implement the recommendations of Natural England’s Stakeholder Working Group on unrecorded rights of way and call on the government to implement these in their entirety and without delay.

5. In addition, the inner London boroughs are not under a duty to map their public rights of way, and many other urban authorities have inadequate and out-of-date maps. Government should encourage the production of up-to-date definitive maps in urban areas so that paths are not lost to development, and the public is encouraged and enabled to walk in our towns and cities.

6. The Government must support and promote public access to wild, open spaces such as mountains, moorland, woodland and coastline, away from rights of way. We urge the Government to commit to a timetable for opening stretches of the English coastal path each year and seek to extend access to open spaces in the forthcoming review of the maps of ‘access land’ created by the Countryside and Rights of Way Act 2000.

26 September 2011
Written evidence submitted by Ewan Larcombe, Leader of the National Flood Prevention Party (NEWP 28)

Omission of dredging

1) My main concern is about lack of conveyance capacity in watercourses caused by a combination of legitimate structural impediments and lack of maintenance.

2) We the human population have no control over the timing, volume or geographical distribution of precipitation and we tend complain about too much or too little rain and even about ‘the wrong type of snow’.

3) But once the precipitation process is complete (i.e. the water has landed as either a liquid or a solid) we do have the some degree of control over the consequences.

4) Irrespective of climate change, the Government has a duty to protect its citizens.

5) In ‘The Natural Choice’ - the words flood, flooded, floods, flooding and floodplains are used on 42 occasions and the word energy is used on 42 occasions.

6) In contrast the words dredging and hydropower are not used at all.

7) Quote: (1.20) Maintaining nature’s capacity to provide the functions upon which we rely is often cheaper than having to replace them by investing in heavy infrastructure or technical solutions.

8) Defra talk about ‘working with natural processes’ but the natural function of rivers as the primary means of flood defence has been neglected in practice.

9) In fact the rivers no longer behave in a natural manner and are controlled by the Environment Agency. Thames dredging has been abandoned for a variety of reasons including ‘too costly’, ‘no disposal facilities’, ‘uneconomic’ and ‘environmentally unfriendly’, and conveyance capacity is ever-decreasing.
10) Around here (Windsor) the new £110m Jubilee River flood alleviation project fell apart in 2003 leading to £5m in repair costs and a £2.75m out-of-court settlement for sub-standard design and construction.

11) The £300m scheme now on the table has a new name – the Lower Thames Flood Risk Management Strategy – but in my opinion will suffer the same problems as the Jubilee River i.e. expensive, disruptive, ineffective and poor value for money.

12) To make matters worse, the local council is now promoting the installation of a series of Archimedean Screw installations at the Thames weirs.

13) I believe that the Environment Agency has a duty to protect people from flooding – by that I mean taking actions that increase watercourse conveyance capacity and thus reduce the probability of flooding.

14) Quote: (2.82) *We want to provide opportunities for communities to shape and manage their environment to reduce their exposure to flood risk.*

15) I believe that dredging the Thames is down to the Environment agency and beyond the ability of individual communities.

21 June 2011
Introduction

1. Research Councils UK (RCUK) is a strategic partnership set up to champion the research supported by the seven UK Research Councils. Further details are available at www.rcuk.ac.uk.

2. This evidence is submitted by RCUK on behalf of the Research Councils listed below and represents their independent views. It does not include or necessarily reflect the views of the Department for Business, Innovation, and Skills.

   Economic and Social Research Council (ESRC)
   Natural Environment Research Council (NERC)

Response

3. RCUK welcomes the strong emphasis Defra have placed on the evidence base in developing the main thrust on the Environment White Paper “The Natural Choice: Securing the value of nature” and the continuing commitment to the Darwin initiative and the Climate fund, among other aspects.

4. The approach in the White Paper is fundamentally sound and forward thinking, providing international leadership in combining consideration of physical, social and biological natural resources. It recognises the intimate interdependence between people, biodiversity and physical natural resources that underpin many of the benefits derived from the environment.

5. RCUK notes the evidence base came from different independent sources and is pleased to see the prominent role played by (a) the UK National Ecosystem Assessment (UK NEA), developed as part of the Living With Environmental Change partnership and co funded by NERC and ESRC, and (b) the Lawton report “Making Space for Nature”. We are encouraged by the recognition that science, economics and social research have broken new ground in demonstrating that erosion of the natural environment is losing us benefits and generating costs. This research is offering new policy and other solutions to the challenges it has identified. RCUK would welcome further dialogue with Defra involving all the relevant stakeholders to ensure the impact of research is maximised as policy-makers and service providers redesign policies and services for the natural environment.

6. The activity driven by the UK NEA demonstrates the agility and flexibility of the research community. The world leading nature of the work is grounded in a thorough understanding of the current state of UK habitats, ecosystem services and trends in their status since the mid-1940s. To make ecosystem services assessments even more powerful, comprehensive and effective, it is essential that social values are included. The ESRC, NERC and Defra are in dialogue with a view to collaborating on a second stage of the NEA to address this and other important challenges.

7. The White Paper acknowledges the potential for the UK to lead internationally in policy development. What is underemphasised is that the strong position of the UK is supported by world-leading research and the role of multinational
businesses in spreading best practice internationally. Research and business activities will often be the best accompaniment to international policy agreements. Overall, this represents an underemphasis on the international role of the UK.

8. The way in which business supply chains function and evolve in relation to environmental challenges needs to be better understood; particularly in the context of the directions set by the White paper. This insight would help improve the efficiency of Government’s efforts to realise its environmental, economic and social ambitions. RCUK would be interested in working with the department on this.

9. The leading position of the city of London in carbon trading and insurance markets, both of which underpin the translation of environmental data and knowledge into business decision-making, is not sufficiently recognised. Recognition of financial markets needs to incorporate investment, trading and insurance if the whole financial system is to drive best practice in environmental management.

10. RCUK welcomes the commitment to establish a research programme to fill evidence gaps associated with the shift toward a sustainable approach to low-carbon energy, to meet 2050 objectives. We are keen to work with Defra through the auspices of the £500M RCUK Energy Research Programme which is addressing these issues.

11. The emphasis on bringing out and making use of the links between human health and well-being and the natural environment is one of the keys to successful implementation. The Committee might consider how proposals in the White Paper will be implemented at individual, community, regional, country and supranational levels, and what this might mean in practice for local authorities, farmers and land owners, businesses and environmental organisations amongst other stakeholders.

21 June 2011
Further written evidence submitted by Research Councils UK (RCUK) (NEWP 29A)

1. Research Councils UK (RCUK) is a strategic partnership set up to champion research supported by the seven UK Research Councils. RCUK was established in 2002 to enable the Councils to work together more effectively to enhance the overall impact and effectiveness of their research, training and innovation activities, contributing to the delivery of the Government’s objectives for science and innovation. Further details are available at www.rcuk.ac.uk

2. This evidence is submitted by RCUK on behalf of the Research Councils listed below and represents their independent views. It does not include, or necessarily reflect the views of the Knowledge and Innovation Group in the Department for Business, Innovation and Skills.

- Economic and Social Research Council (ESRC)
- Natural Environment Research Council (NERC)

Area 1. What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

3. The ecosystem approach¹ is currently understood by researchers and policymakers, but less so by prospective users. Action is needed on communicating and demonstrating how to use the approach in decision-making. There has been significant investment in research, as summarised in recent assessments, e.g. the UK National Ecosystem Assessment (UK NEA)², The Economics of Ecosystems and Biodiversity (TEEB)³ programme; but there is a risk that investment in the engagement of public organisations and business sectors will be insufficient for adequate pull-through to successful application.

4. It is important that the Government continues to participate in the co-design, co-delivery, co-production and use of interdisciplinary research on a cross departmental basis, as exemplified by the Living With Environmental Change⁴ (LWEC) partnership. LWEC partners include numerous Government departments⁵; in addition it has a business advisory board⁶ (the LWEC BAB) with charities⁷ involved in funding specific activities. The partnership is built on the ethos of researchers working together in partnership with users. The UK NEA and

² http://uknea.unep-wcmc.org/
³ http://teebweb.org/
⁴ http://www.lwec.org.uk/
⁵ http://www.lwec.org.uk/partners
⁶ http://www.lwec.org.uk/people/advisers
⁷ http://www.lwec.org.uk/activities/insect-pollinators-initiative
the use of the UK NEA in formulating the Natural Environment White Paper exemplifies the ability of the LWEC partnership to deliver foresight, knowledge and tools through the work of the academic and policy communities to underpin government policy.

5. Discussions of the LWEC BAB, established to provide strategic business input into LWEC programmes, have highlighted that business users require clear policy, with targets and timescales to plan investment decisions and activities. These are not clear in the White Paper at present.

Area 2. Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

6. No comment.

Area 3. What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

7. Practical demonstration and feasibility projects are required with users such as businesses, local authorities, environmental organisations, farmers, landowners, citizens and schools, so that they can learn how to consider and incorporate the value of nature in decision making. This will need to be accompanied by user-focussed tool-kits developed by those who understand user needs, working at the interface between scientific research and application. RCUK would be happy to facilitate this process in collaboration with other stakeholders.

8. Work on valuation needs to be conducted with businesses, local authorities and other users to allow valuation approaches to be hard-wired into existing systems for valuing assets, rather than creating additional stand-alone systems. Research and evidence is needed to support this activity, particularly with regard to identifying and developing the underpinning socio-ecological system knowledge that will enable robust monetary and non-monetary valuation to be achieved. Relevant work involving the Research Councils which is already underway includes:

- the Natural Capital Initiative8 (NCI) – the NCI is a leading UK forum bringing together scientists, policy-makers, business, industry and others, to discuss how the ecosystem approach might be implemented in practice;
- the Valuing Nature Network9 (VNN) – VNN, sponsored by NERC, is supporting interdisciplinary partnerships to scope, develop and promote research capacity in the valuation of biodiversity, ecosystem services and

8 http://www.naturalcapitalinitiative.org.uk/
9 http://www.valuing-nature.net/
natural resources and facilitate the integration of such approaches in policy and practice in the public and private sectors.

9. There is a danger the ecosystem approach will remain in the domain of sectors with which Defra has traditionally engaged, e.g. agriculture, land management and water companies, and not penetrate into others, e.g. building management and transport. Research needs to focus on areas of the economy and society that have a major impact on ecosystems, and these may be areas that Defra is less used to engaging with. RCUK can advise and broker discussions with relevant academics.

10. More research is required on the value of water - from an economic, social and shared social value perspective. Shared social value in particular is a new and challenging area for the government to address.

11. Data integration and accessibility are important issues. The NERC soil portal\textsuperscript{10} is an example of where Research Council supported datasets are being brought together in an accessible form for users. The Portal provides a gateway to discover, view and download large-scale soils property datasets from across NERC research centres with the ultimate aim of helping create sustainable land management solutions to prevent degradation.

12. NERC has much existing and planned research relevant to Defra’s commitments in the White Paper, through its research centres\textsuperscript{11} and directed research programmes (including LWEC accredited activities\textsuperscript{12} such as the UK NEA, Biodiversity & Ecosystem Service Sustainability programme, the VNN, the Changing Water Cycle programme, the joint DFID-NERC-ESRC-funded Ecosystem Services for Poverty Alleviation programme), and the funding these provide to unsolicited ideas from research groups, consortia or individuals\textsuperscript{13}. It is therefore important that Defra and NERC work together in partnership both to access and analyse evidence already available, and ensure LWEC’s principles of co-design, co-delivery and co-production are implemented in ongoing and future research.

13. NERC’s Knowledge Exchange (KE) group is committed to helping Defra develop and deliver its policy objectives and will help to broker the appropriate links between scientists and policymakers and other partners where needed. The NERC KE group is currently working with Defra to map existing evidence and activities against commitments made in the Natural Environment White Paper and to identify gaps. This builds on previous NERC-Defra collaboration to develop and deliver environmental policy on a wide range of areas. Previous areas of success

\textsuperscript{10} http://www.bgs.ac.uk/nercsoilportal/home.html
\textsuperscript{11} http://www.nerc.ac.uk/research/sites/research/
\textsuperscript{12} http://www.lwec.org.uk/activities
\textsuperscript{13} http://www.nerc.ac.uk/research/responsive/
include: the state of UK seas\textsuperscript{14}; drought monitoring and forecasting\textsuperscript{15}; best practice for managing peatlands\textsuperscript{16} and developing policy on environmental stewardship\textsuperscript{17}.

\textbf{Area 4. What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?}

14. Whilst the UK is in the lead of much of the conceptual work behind ecosystem services, other European countries have been developing holistic approaches to environmental management. For example, companies such as Suez Environment based in France with a worldwide presence, including almost 80,000 employees, are taking a joined-up approach to delivering water and waste management services.

15. In the USA, the Natural Capital Project\textsuperscript{18} engages leaders in key institutions to meld world-class research and development with influential, on-the-ground conservation programs, and is developing tools that make it easier to incorporate natural capital into decisions. US scientists are also collaborating with India and China, who are increasingly making decisions on an ecosystems basis.

16. On a global level, mining companies have had to look specifically at biodiversity and conservation alongside their activities and have developed methodologies appropriate to gaining permits to mine relating to their support of ecosystem services. For example, Rio Tinto are involved in biodiversity offsetting\textsuperscript{19} by funding conservation in areas away from sites developed for mining purposes to “offset” damage caused, with benefits to the natural environment as well as Rio Tinto’s corporate image. The ESRC funded Centre for Business Relationships, Accountability, Sustainability and Society (BRASS) has done some work in this area\textsuperscript{20}.

17. The Dutch approach to the environment, as exemplified by 4th National Environmental Policy Plan\textsuperscript{21} of the Netherlands and by the energy transition approach they developed into seven transition platforms\textsuperscript{22} may be a useful model to explore. In the UK this has been embodied, from a research point of view, into the Foresight\textsuperscript{23} initiative, but a more proactive approach, based on the exploration and iterative evaluation of opportunities arising from niches identified through

\textsuperscript{14} http://sid.nerc.ac.uk/details.aspx?id=323
\textsuperscript{15} http://sid.nerc.ac.uk/details.aspx?id=315
\textsuperscript{16} http://sid.nerc.ac.uk/details.aspx?id=232
\textsuperscript{17} http://sid.nerc.ac.uk/details.aspx?id=177
\textsuperscript{18} http://www.naturalcapitalproject.org/home04.html
\textsuperscript{19} http://www.riotinto.com/ourapproach/17214_biodiversity.asp
\textsuperscript{20} http://brass.cf.ac.uk/projects/Resource and Technology Management/resource-and-technology-management-for-sustainability.html
\textsuperscript{21} http://www.iea.org/textbase/pm/?mode=pm&id=575&action=detail
\textsuperscript{22} http://www.horizons.gc.ca/page.asp?pagenm=2010-0059_05
\textsuperscript{23} http://www.bis.gov.uk/foresight
Foresight-type initiatives could lead to the UK becoming a leader in those future markets. The Essex Energy Group\textsuperscript{24} has also been working in this area. The White Paper provides interesting opportunities here, as Nature Improvement Areas, Local Nature Partnerships and the biodiversity offsets proposed in it are all akin to niches. The Rural Economy and Land Use programme\textsuperscript{25} has also built on a similar approach and it is especially relevant here.

\textbf{Area 5. What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?}

18. Resources are required to communicate and work with organisations to help them take up the ecosystem approach. Overcoming barriers to understanding the approach and how it fits their models of operation is key.

19. Investment in the implementation of the ecosystem approach will come from businesses once the regulatory environment (with appropriate targets and incentives) is clear and the benefits of the approach are apparent. Without this, businesses as well as other organisations across sectors are unlikely to change quickly. More certainty on the introduction of environmental taxation based on careful valuation would help considerably in this area and these could substitute some of the current taxation schemes, rather than being additional.

\textbf{Area 6. Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?}

20. No comment.

\textit{21 September 2011}

\textsuperscript{24} http://www.essexenergy.ca/
\textsuperscript{25} http://www.relu.ac.uk/
1 The Heritage Lottery Fund (HLF) welcomes the Natural Environment White Paper and its ambition in strengthening connections between people and nature. HLF has invested over £390m on natural heritage since 1994 and around 25% of our annual budget of £250m goes to landscape and biodiversity projects. All our grants over £50,000 deliver learning outcomes and either or both physical conservation works and community participation. We have had particular success and experience in stimulating a renaissance of the UK’s public parks, developing innovative landscape-scale partnerships and funding delivery of over 2,600 nature conservation projects.

2 Nature Improvement Areas (NIAs) – we support the initiative to work at a landscape scale but suggest the £7.5m budget for 12 initial NIAs will be insufficient to make an impact. Since 2004 HLF has invested around £66m in 45 Landscape Partnership projects delivering landscape-scale conservation to areas of between 20 and 200 kms square. If match funding is included we estimate an average scheme cost of around £1.7m per Landscape Partnership scheme which is obviously more than the £625,000 per scheme proposed for NIAs. We are aware that there are already 100 existing Wildlife Trust Living Landscapes and around 80 RSPB Futurescapes, as well as our own Landscape Partnerships. We suggest DEFRA might focus on better coordination, mapping and support of existing schemes, with NIAs used to focus on much larger geographic scale interventions.

3 Green Flag Awards scheme - we support Commitment 66. Green Flag Awards are currently funded by DCLG but only until September 2012. Beyond that the scheme’s future is in doubt. A nationally promoted quality standard for public parks is paramount to helping park managers maintain high standards of maintenance required to promote use and deliver benefits such as health, quality of life and tranquillity. The Green Flag Awards scheme needs to be refreshed and maintained as a national programme supported by Government and all local authorities. The White Paper extols the values of green space but does not include any proposal to make provision of quality public green space a statutory requirement for local authorities. Without such a statutory requirement it is likely that those communities with the poorest provision will continue to suffer. Recent evidence from parks charity GreenSpace shows that many public parks are facing greater cuts to their services than those faced by local authorities as a whole. A particular casualty is likely to be staff posts associated with developing community activities such as volunteering, as well as those associated with professional services such as ecology, arboriculture and horticulture.

4 Funding – for HLF to assist delivery of net biodiversity gain partnership funding will be critical. We have reduced our match funding requirements to help applicants but sourcing match funding is increasingly challenging. It would help if the loss of funding from the Aggregates Levy Sustainability Fund were reconsidered, and the flexibility and support given by DEFRA to applicants under EU programmes such as EU Life+ reviewed.

21 June 2011
Background and interests

1. The Natural History Museum (NHM) has a mission to maintain and develop its natural history collections to be used to promote the discovery, understanding, responsible use and enjoyment of the natural world.

2. In a world where human societies are changing rapidly, there are intense economic and social pressures on the natural environment that is essential for our survival. The rate of change is rapid and potentially unsustainable and the need for understanding, knowledge and effective action is pressing. The NHM has always been closely aligned with humanity’s practical, economic and cultural interests in the environment, but at no other time has the need for the NHM been so great.

3. The NHM’s statutory obligation under the British Museum Act 1963 is to care for and give access to the nation’s natural history collections. The collections comprise over 70 million specimens, ranging from the world’s best collection of meteorites, including those dating back to the formation of our solar system, to DNA samples from mosquitoes collected and stored using the latest technology. The Museum, through its collections, is part of the UK’s science base and a major intellectual infrastructure that is used by its own 350 scientists and over 8,000 annually from across the UK and the globe to enhance knowledge on the diversity of the natural world and addresses some of the major challenges society faces, from biodiversity loss due to climate change to the spread of parasitic disease and to the sustainable use of natural resources. The NHM is the pre-eminent institution in a wide international network of collaboration and common purpose with respect to the natural world. The NHM cares for and develops these collections for future generations to use in ways not currently possible or imagined to help answer future scientific questions of importance.

4. The NHM is a recipient of Darwin Initiative funding from Defra for a range of projects that assist countries that are rich in biodiversity but poor in financial resources to meet their objectives under one or more of the three major biodiversity Conventions: the Convention on Biological Diversity (CBD); the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES); and the Convention on the Conservation of Migratory Species of Wild Animals (CMS), through the funding of collaborative projects which draw on UK biodiversity expertise.

5. The NHM run a number of citizen science facilities and projects which aim to encourage public interest in the natural environment and support that interest using Museum expertise.

Submission

1. The Natural History Museum broadly welcomes the White Paper and welcomes the opportunity to make a submission to this inquiry.
Question 1: Any key elements in the White Paper which are supported?

2. The Museum is particularly encouraged by the cross-Governmental approach in and support for the White Paper. This is vital recognition by Government that natural environmental issues are of interest to a number of Government Departments and progress and success in this crucial area can only be achieved through a unified approach by Government.

3. We strongly endorse the use of evidence and thinking from the National Ecosystem Assessment as a foundation for the future of environmental policy and welcome the commitment to continued research in this framework to support policy development.

4. The Museum particularly welcomes the Department for Education’s contribution to the White paper and the recognition of the importance of biodiversity education for the next generation to ensure the aspirations in the White Paper are realised.

5. We welcome the recognition of the need to further engage individual people and local communities in this area and look forward to being part of the action required to enable this. The Museum will develop its existing collaboration in the UK with local partners: wildlife organisations, universities, museums and others on biodiversity and environment.

6. The Museum supports the value of nature approach in the White Paper: this builds on existing success in using economic value in environmental policy but extends the approach to a broader spectrum of interests and activities. Successful deployment of this approach will require further development and research.

7. The Museum supports the proposed joining-up of protected areas arising from the Lawton report and believes that the Nature Improvement Areas scheme has great promise in progressing the White Paper’s ambitions in this regard. However, we would suggest that this should require scientific assessment as a prerequisite for funding, coupled with ongoing monitoring.

8. The Museum strongly supports the ambition that legislation should be science-based, but it is important that legislative approaches recognise the progressive improvement of scientific understanding. The function of ecosystems and consequent value continues to be investigated: legislation needs to take account of current uncertainties and the prospect of improved understanding in future.

Question 2: Any particular sections which could be improved?

9. The emphasis on the economic value of ecosystem services is important and needs further development. However, it is important also that the limitations of this approach are recognised: the value expressed is most likely to be the value of current services and attempts to trade off different values are likely to be approximate. Incremental and small-scale impacts are difficult to quantify.
10. Potential, intrinsic and future values are far more difficult to assess, particularly with respect to complex biodiversity and genetic resources. In this respect, it is important that policy recognises the pragmatic importance of economic tools, but equally their limitations. Potential value may not easily be accommodated in economic models but may be better safeguarded through the development of ethical considerations or consideration of intergenerational equity.

11. For example, the White Paper’s ambition to move from a position of net loss to net gain of biodiversity is welcome, but we urge the need for caution to ensure that this net gain should not be achieved by an increase in alien invasive species. We would encourage a complex view of biodiversity and the adoption of an ecosystem approach, in line with the CBD definition of biodiversity.

12. The value of biodiversity in effective and sustained delivery of the range of services identified in the NEA is only partially understood. This will require further development in coming years: a dual approach of definition of biodiversity as part of the ecosystems and of the nature and value of the service. In particular, there are some elements of biodiversity—such as micro-diversity, or the genetic diversity of populations—that are likely to have an important value in terms of the quality and resilience of service where knowledge must be improved. 2011, for example, has seen the publication of papers that open up the prospect of a much wider range of fungal microdiversity than was previously suspected. One area of continuing challenge will be intrinsic value of ecosystems.

Biodiversity Research
13. The role of biodiversity research is central to achieving the aims of the White Paper but its role is not given sufficient prominence: we anticipate that this will be addressed to some extent in the Biodiversity Strategy, but it is important that biodiversity research is seen in the broader context of environmental research, both in the UK and internationally.

Biodiversity Indicators
14. Biodiversity indicators need to be appropriately defined and that may mean using different criteria are used for marine versus terrestrial systems. Previous targets were inappropriate for the marine environment because climate changes had ensured that the less diverse coldwater plankton is being replaced by a more diverse warm-water fauna, so species diversity actually increased but this does not mean the system is healthier. While there is a need for better indicators, it is important from a public point of view that the shift of baseline represented by the older indicators is well communicated to avoid a loss of confidence.

Biodiversity Offsets
15. Whilst there is a pragmatic aspect to biodiversity offsets, the Government needs to establish very clear criteria about how this will work. Some ancient habitats are irreplaceable and cannot be offset. The viable size of offsets will also need to be defined.
British Overseas Territories
16. Collectively the British Overseas Territories hold more biodiversity (in terms of numbers of species) than the British Isles, and are home to many more endangered species. Government activities are welcome in this area and need to ensure that Overseas Territories are included in monitoring and reporting processes. The Museum, with its historic collections and expertise, is uniquely placed to support local initiatives but mechanisms will be needed. The Ecosystems Knowledge Network should include Overseas Territories and the Museum is happy to be involved in this development.

**Question 3: Any omissions from the White Paper which Defra should rectify?**

Integrated Approach
17. Much of the impact of climate change will be perceived by society via its impact on biodiversity loss. The Museum would therefore encourage an integrated approach to biodiversity loss and climate change by Government.

21 June 2011
Further written evidence submitted by the Natural History Museum (NEWP 31A)

Background and interests

1. The Natural History Museum (NHM) has a mission to maintain and develop its natural history collections to be used to promote the discovery, understanding, responsible use and enjoyment of the natural world.

2. In a world where human societies are changing rapidly, there are intense economic and social pressures on the natural environment that is essential for our survival. The rate of change is rapid and potentially unsustainable and the need for understanding, knowledge and effective action is pressing. The NHM has always been closely aligned with humanity’s practical, economic and cultural interests in the environment, but at no other time has the need for the NHM been so great.

3. The NHM’s statutory obligation under the British Museum Act 1963 is to care for and give access to the nation’s natural history collections. The collections comprise over 70 million specimens, ranging from the world’s best collection of meteorites, including those dating back to the formation of our solar system, to DNA samples from mosquitoes collected and stored using the latest technology. The Museum, through its collections, is part of the UK’s science base and a major intellectual infrastructure that is used by its own 350 scientists and over 8,000 annually from across the UK and the globe to enhance knowledge on the diversity of the natural world and addresses some of the major challenges society faces, from biodiversity loss due to climate change to the spread of parasitic disease and to the sustainable use of natural resources. The NHM is the pre-eminent institution in a wide international network of collaboration and common purpose with respect to the natural world. The NHM cares for and develops these collections for future generations to use in ways not currently possible or imagined to help answer future scientific questions of importance.

4. The NHM is a recipient of Darwin Initiative funding from Defra for a range of projects that assist countries that are rich in biodiversity but poor in financial resources to meet their objectives under one or more of the three major biodiversity Conventions: the Convention on Biological Diversity (CBD); the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES); and the Convention on the Conservation of Migratory Species of Wild Animals (CMS), through the funding of collaborative projects which draw on UK biodiversity expertise.

5. The NHM runs a number of citizen science facilities and projects which aim to encourage public interest in the natural environment and support that interest using Museum expertise.

Submission

1. The Natural History Museum broadly welcomes the White Paper and welcomes the opportunity to make a submission to this second inquiry on this subject. The Museum made a
submission to the previous inquiry by this Committee on the White Paper. This submission answers the questions which the Museum feels it has expertise to do so and something to add.

**Question 1: What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?**

2. The Natural History Museum has a mission to maintain and develop its natural history collections to be used to promote the discovery, understanding, responsible use and enjoyment of the natural world. We connect our 20 million visitors, physical and virtual with nature, using our collections to inspire a greater understanding of our place and impacts on the natural world.

3. Since free admission was reintroduced in 2001 we have seen our physical visitor numbers increase by 184% to over 4.7million a year. Our virtual visits are above 15million a year. We believe this demonstrates a growth in public interest in nature and environmental issues.

4. As part of our public offer we provide visitors with the opportunity to interact with our scientists and debate issues of societal concern, as well as a full schools programme. We also support citizen science activities which encourage a deeper understanding and engagement with nature.

5. Our citizen science activities support amateur naturalist groups by providing expertise and resources like the Angela Marmont Centre for UK Biodiversity: http://www.nhm.ac.uk/visit-us/darwin-centre-visitors/marmont-centre/index.html, as well as encouraging the general public to record and monitor their local biodiversity through online surveys like those conducted by the Open Air Laboratories network, OPAL: http://www.opalexplorenature.org/.

6. The Museum supports the White Paper’s ambition to reconnect people with nature and believes that with a joined-up approach by Government Departments, working with local government and civil society these proposals can be achieved. There are many established organisations, including the Museum, which are already delivering on these proposals. Networking these and providing further support will assist in achieving the ambitions of the White Paper.

7. Recognising the value of natural history collections in delivering the ambition is very important, both in their capacity to inspire schoolchildren and families and as a resource for amateur naturalists. The scientific value of these collections and use as a national scientific infrastructure for research both professional and amateur should also be considered worthy of Government support.

8. The Museum co-ordinated, with Defra support, the UK activities to celebrate and raise awareness of the UN International Year of Biodiversity in 2010. We created a network of over 400 partners who were a range of organisations from different sectors from across the UK. This network shared information and resources to encourage public engagement in their
local biodiversity and wider environmental issues. The programme was seen as a success, both by partners and funders. A similar networking device could be deployed for delivering the White Paper’s proposals.

**Question 5: What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?**

The White Paper outlines policy goals and related initiatives, with indication of funding for some of the actions proposed. The achievement of the goals of the White Paper will rely almost entirely on the coordinated response of public agencies, research organisations, private sector bodies, voluntary groups, charitable organisations and many individual members of the public. All of these organisations and individuals, including the NHM, already devote substantial resource to the broad goals articulated in the White Paper: policy development and implementation must add value and momentum to this existing effort, with new resource in key areas.

These goals and resources should be seen in an international context: both European and more widely. The White Paper refers to the UK’s commitments with respect to the 2020 target of halting biodiversity loss and the implications of the Nagoya agreements under the Convention on Biological Diversity. Effective action on the environment involves the coordination of efforts and resources to reach common goals—within the UK and its overseas territories; with respect to the UK’s international footprint; and to meet the UK’s duties and commitments for international leadership and capacity-building.

The specific funds indicated in the White Paper – such as the additional support for the National Biodiversity Network and for voluntary recording and development – are a very welcome addition to the resources currently made available from all sectors.

The new England Biodiversity Strategy develops some of the themes in the White Paper and makes reference to resource requirements and additional funding. The Committee will already be aware of the detail of the National Ecosystem Assessment, which informed the development of the White Paper and the Biodiversity Strategy. The Technical Reports for the NEA are very useful in assessing gaps in current knowledge and capabilities with respect to ecosystem services: it represents the best current understanding of the UK’s capabilities in this area. If the ambitions of the White Paper are to be fulfilled, there will need to be careful appraisal of these gaps, discussion on which are most critical as barriers to effective understanding and action, and organisation of resources to address this need.

A number of the gaps identified in the NEA Technical reports relate to scientific capability and information. The NHM has recently undertaken a *UK Taxonomy and Systematics Review* for NERC, assessing the current status of taxonomy in the UK, which will continue to be essential in supporting research and action on ecosystems, biodiversity monitoring, and in conservation – all within the goals of the White Paper. The review has informed in turn a
view from nine scientists chaired by Professor Charles Godfray FRS Developing a National Strategy in Taxonomy and Systematics. The recommendations from this group involve the coordination of effort, strategy and resources of research councils, research institutions such as the NHM and others to provide the science needed for policy and practice.

**Question 6: Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?**

The White Paper uses some positive case studies about current projects and initiatives that are about engaging the public with nature. However, we don’t believe that the White Paper does set out an accurate assessment of barriers to public engagement with the natural environment. The White Paper sets the ambition and framework for delivering that ambition, but it does not currently and probably can not map all the players involved and acknowledging the Government has a role, but is not the only critical player in delivering this is useful.

The Museum does believe that the Government could make more use of and recognise the value of organisations it funds, like the Museum, in helping to deliver this White Paper’s ambition.

26 September 2011
1 IFAW welcomes the commitment to include natural capital in national accounts, and the establishment of a Natural Capital Committee, reporting to the Economic Affairs Cabinet Committee chaired by the Chancellor. The White paper will succeed only if action is taken across Government; involvement of the Treasury is vital.

2 IFAW is pleased departments will be held to account by the Cabinet Office through the Minister for Government Policy (3.40). Implementing the White paper must be seen as a task for all departments. Placing responsibility for ensuring this is the case in the Cabinet Office is the right approach. However, IFAW is not convinced using just the quarterly review of business plans to achieve this will provide sufficient scrutiny.

3 Paragraph 3.44 states “Departments will be open about the steps they are taking to address biodiversity and the needs of the natural environment…” but clarification is required on how this will be done.

4 IFAW welcomes the commitment to develop new targets on development aid to deliver more resources in pursuit of biodiversity goals (5.5). Development aid has often ignored the importance of the natural environment, yet without a healthy natural environment poverty eradication will ultimately fail. IFAW looks forward to seeing further detail on these targets.

5 IFAW welcomes the Government’s determination to ensure action to reduce emissions through tackling deforestation also realises benefits for biodiversity (5.10), as well as the commitment of substantial money towards forest conservation through the International Climate Fund (ICF). However, there is no explanation of how decisions on funding will be taken. This is substantial Government spending so greater clarification is required.

6 IFAW welcomes the recognition of the link between wildlife crime and other serious international crime (5.14, 5.15). The White Paper states it will ensure cooperation across departments and with Border Police Command, National Wildlife Crime Unit (NWCU) and the proposed National Crime Agency to tackle the trade in endangered species. IFAW welcomes continued funding for the NWCU, however this has been confirmed only until March 2013 and it is not clear what will happen after that. This needs clarification, along with how the NWCU will relate to the NCA (or whether it will become part of it) and whether wildlife trafficking will be included in the NCA’s remit, given its links to other serious organised crime.

7 IFAW welcomes the commitment to support the IWC moratorium on commercial whaling (5.15). However, this continues to be flouted by Japan, Iceland and Norway. The Government’s commitment to protect whales would be better expressed if the aim was to bring all forms of commercial whaling to an end through activities inside and outside the IWC.

8 One significant omission in relation to international issues is monitoring and reporting progress. Although chapter 6 mentions development of indicators to track progress on the White Paper, suggestions and examples given in that chapter focus specifically on domestic issues. A way to track international progress is also needed.

9 IFAW recommends that the Committee take evidence from the Treasury and Cabinet Office given their roles in ensuring implementation of the White Paper across
Government. IFAW also recommends that the Committee look into DfID’s role, especially considering substantial Government spending through the ICF.

21 June 2011

1 The International Fund for Animal Welfare (IFAW) saves animals in crisis around the world. IFAW has representation in 15 countries and carries out its animal welfare and conservation work in more than 40, improving the welfare of wild and domestic animals by reducing the commercial exploitation of animals, protecting wildlife habitats and assisting animals in distress. IFAW is supported in this work by over a million supporters worldwide of which some 400,000 are based in the UK. IFAW is a member of Wildlife and Countryside Link (WCL) and supports the submission made to the Committee by WCL in addition to this response.
Written evidence submitted by the British Mountaineering Council (NEWP 33)

Background

The British Mountaineering Council (BMC) is the representative body for climbers, hill walkers and mountaineers in England and Wales. With over 70,000 members who participate in a range of activities from hill and coastal walking to climbing and bouldering, the need to respect the natural environment is never more apparent than to those who visit, explore and enjoy the landscape in which they undertake their activities.

The BMC interest in the publication of The Natural Choice is focussed around chapter 4, Reconnecting People and Nature. The BMC gives advice to our broad membership on how best to engage and respect the natural environment whilst enjoying its unique qualities. As a land owner and manager with responsibility for over 90 acres of recreational space, our expertise in environmentally sensitive land management practices for the benefits of both recreation and conservation is increasingly called upon.

The BMC welcome the commitment to restoring our natural environment, and the central place given to people in the White Paper. However, we believe it fails to fully recognise the important role that access and recreation play in facilitating the public’s understanding and enjoyment of the natural environment; in particular wider access provision through the Countryside and Rights of Way Act 2000 (CROW) and through the Marine and Coastal Access Act 2009 (MCAA).

The BMC supports;

1.1 The recognition of the important health benefits access to the natural environment can bring;
1.2 The commitment to embed the value of the natural environment through education and outdoor learning;
1.3 Government plans to improve other aspects of local environment quality (e.g. litter and light pollution).

The BMC believe the following could be improved;

2.1 Chapter 4, Connecting By Improving Access to the Countryside. This section is entirely focussed on improving and extending cycling and walking routes, and presents only a partial, narrow view of how to connect society with nature. It is important for Government to recognise that access to our moorlands, mountains, our wild spaces, our cliffs and rock faces, away from linear routes, is a major part of the recreational experience for many. Open air recreation in its broadest sense needs to be a more prominent theme in this chapter.

Government should rectify the following omissions in Chapter 4;

3.1 The Government has inherited a fine legacy in relation to improved access to our countryside for recreation on foot in particular through CROW and the MCAA. The Paper fails to celebrate the public’s ability to enjoy and access nature through this legislation and offers no recognition or support for current open access provision.
3.2 The paper ignores the future of coastal access in England; an indication of the lack of commitment and understanding of the value of public access to the coast.

Action for Government

- Commit to a timetable for opening stretches of the English coastal path each year
- Support current access provision and support existing bodies in the delivery of public access and wider recreational opportunities
- Recognise the importance of outdoor recreation in any new landscape designations
- Protect long-term access to recreational land now owned by public bodies
- Continue to promote the benefits of, and opportunities for all types of quiet, open air recreation

21 June 2011
Written evidence submitted by WWF-UK (NEWP 34)

1. WWF-UK welcomes:

1.1. The Government’s commitment to putting the value of the natural environment at the heart of economic thinking, and the way we measure economic progress nationally. The economy and our well-being are fundamentally dependent on the natural environment and it is essential that the Government’s overarching economic aim is sustainable development rather than maximising short-term growth;

1.2. The establishment of an independent Natural Capital Committee and the inclusion of natural capital in the UK Environmental Accounts;

1.3. New guidance in the Treasury’s Green Book on valuing the natural environment in policy appraisals, including both monetary and non monetary valuation, and taking into account the diverse ways different stakeholders value nature;

1.4. The recognition that integrated action at a 'landscape scale' is the best way to achieve multiple benefits and restore ecological networks;

1.5. The commitment to reform the water abstraction system in the forthcoming Water White Paper. We hope to see clear timetables and plans to amend licences so that only sustainable amounts of water are abstracted from rivers and the natural environment, and this is done as efficiently as possible.

2. We believe the following should be improved:

2.1. Addressing England’s global footprint: over one third of the biomass (wood, food, fibre, bioenergy etc) used by the UK economy is imported¹, and although there is clear acknowledgement of the issue, overall the level of response proposed does not match this level of demand on overseas ecosystems. There is no explicit commitment to reduce or minimise the impact of our economy on the natural environment in other countries. There are some relevant measures in the Green Economy section but these do not add up to a concerted effort or strategic approach that would follow from a high level commitment to fully address England’s responsibilities in this area. The key measures proposed to put the natural environment at the heart of economic thinking focus on national rather than global impacts;

2.2. Integration with economic policy: it is not clear how the Natural Capital Committee, nor the inclusion of Natural Capital in environmental accounts, will ensure that the natural environment will be at the heart of economic policy making within the Treasury and BIS. This is a crucial and challenging task, given that currently, the only environmental benchmark in the Government’s Plan for Growth ('increased investment in low carbon technologies’) is not a sufficient measure of sustainability;

2.3. Integration with current planning reforms: we are concerned that some elements of the emerging planning reforms (e.g. aspects of Energy National Policy Statements, the National Planning Policy Framework and the Localism Bill) are contrary to the aims of the NEWP and we query how conflicts and inconsistencies may be reconciled. In particular the reforms should ensure the planning system is geared towards achieving sustainable development, with a clear definition that this includes economic growth within environmental limits;

2.4. Local Nature Partnerships: while we welcome the establishment of the Local Nature Partnerships, we have some concerns that the creation of separate bodies to deal with particular local issues (economy, environment) will lead to a siloed approach that does not promote sustainable development at the local level. To be effective, LNPs must be given the same level of support (financial and administrative) and recognition within the planning system as Local Enterprise Partnerships.

1961-2011: 50 years of conservation. WWF works in over a hundred countries to protect the natural world, tackle climate change and promote sustainable consumption.

21 June 2011
Further written evidence submitted by WWF-UK (NEWP 34A)

Summary of WWF’s key recommendations:

- Better integration and co-ordination is required in central Government of green economy policy with core economic strategy.
- Greater transparency and representation in key advisory bodies, e.g. Green Economy Council and Ecosystem Markets Task Force.
- Greater political commitment and a more strategic approach to reducing the economy’s impact on the natural environment overseas.
- Ensure planning reforms promote genuinely sustainable development.
- Actions for the forthcoming Water White Paper:
  - Develop a firm timetable (with 2027 as the end point) and a clear process to reform the water abstraction regime so that all licences reflect environmental limits.
  - Commit to funding solutions via the 2014 periodic review for the rivers where water company abstraction damage is officially confirmed.
  - Reform abstraction charges to reflect the value of water.
  - Develop a strategy for implementing the Walker Review recommendation to introduce meters in 80% of households by 2020, alongside tariffs to protect vulnerable customers and deter waste.
- Local Nature Partnerships should be given the same level of support (financial and administrative) and recognition within the planning system as Local Enterprise Partnerships.
- Natural Capital Committee should play a similar role to the Climate Change Committee: monitoring progress towards biodiversity and natural capital targets; providing policy recommendations; and considering impacts outside the UK.
- More research on suitability of Impact Assessments in taking the value of nature into account in policy appraisal; develop consensual, multi-criteria, multi-stakeholder valuation processes that capture values of nature that cannot be meaningfully quantified in monetary terms.
WWF-UK response to inquiry questions

What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy?

Better integration and co-ordination in central government of green economy policy with core economic strategy.

1. One key element of the Natural Environment White Paper’s (NEWP) proposals to grow a green economy was the ‘green economy roadmap’. The publication of the roadmap (‘Enabling the Transition to a Green Economy’) in July 2011 was a welcome step in providing greater clarity for business on the policy framework. However, WWF was disappointed that the document did not herald the new, comprehensive and strategic approach to green economy policy that is required to address the scale and urgency of the challenge. No significant new policies were announced and it is not clear whether this initiative will lead to better co-ordination of these policy areas on an ongoing basis.

2. Furthermore, although credit is due for effective collaboration between the Department for Environment, Food and Rural Affairs (Defra), Department for Business, Innovation and Skills (BIS) and Department for Energy and Climate Change (DECC), the most important department in terms of economic policy – the Treasury – was absent from the core project team. This gives the impression that green economy policy continues to be seen as an ‘add-on’ to core economic concerns. Further evidence for this can be found in the Plan for Growth, published with the Budget in April 2011, in which, out of sixteen measures of success, only one weak environmental measure was included (‘increased investment in low carbon technologies’). We recommend that in the second phase of the Growth Review, the Treasury and BIS put an ambitious green growth strategy at the centre of their plans to foster a sustainable economic recovery.

Greater transparency and representation in key advisory bodies, e.g. Green Economy Council and Ecosystem Markets Task Force.

3. The NEWP announced the establishment of two business-led advisory groups: the Green Economy Council and Ecosystem Markets Task Force. In order to ensure their advice and recommendations are geared towards achieving environmental and equitable outcomes, as well as economic efficiency, we would like to see greater representation on these bodies for environmental scientists and economists, as well as other stakeholder groups in civil society. In addition, the proceedings of these bodies should be in the public domain.
Greater political commitment and a more strategic approach to reducing impact on the natural environment overseas

4. We welcome the Government’s ambition in the NEWP to grow ‘a green economy which not only uses natural capital in a responsible and fair way, but contributes to improving it.’ The UK economy depends heavily on the natural capital we import from overseas – and consequently much of the environmental impact of our economy falls outside the UK. According to the Government’s National Ecosystem Assessment, over one third of the biomass (food, fibre, timber, biofuels etc) used in the UK is imported. WWF’s 2010 Living Planet Report shows that if everyone on Earth consumed resources at the rate of the average person in the UK, we would need almost three planets.

5. Although there is clear acknowledgement of this issue in the NEWP, overall the level of response proposed does not match this level of demand on overseas ecosystems. There is no explicit commitment to reduce or minimise the impact of our economy on the natural environment in other countries. There are some relevant measures in the Green Economy section but these do not add up to a concerted effort or strategic approach that would follow from a high level commitment to fully address England’s responsibilities in this area. The key measures proposed to put the natural environment at the heart of economic thinking focus on national rather than global impacts. Additional measures could include:

- Sustainable public procurement: although the commitment to 100% sustainable seafood is very welcome, minimum standards for certified sustainable wood products, palm oil and soy should be applied to public procurement contracts at all levels including local government, schools and the NHS.
- Adopt consumption-based indicators and strategies, including carbon, ecological and water footprints.
- More financial and technical support for natural resource management in developing countries through the overseas aid programme.

Ensure planning reforms promote genuinely sustainable development

6. We are concerned that some elements of the emerging planning reforms (e.g. aspects of Energy National Policy Statements, the National Planning Policy Framework (NPPF) and the Localism Bill) are contrary to the aims of the NEWP and we query how conflicts and inconsistencies may be reconciled. In particular the reforms should ensure the planning system is geared towards achieving sustainable development, with a clear definition that includes economic growth within environmental limits. WWF considers that the presumption in favour of sustainable development, as currently drafted in the NPPF, is really just a presumption in favour of any and all development. Without fundamental amendments,

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it may cause significant damage to the natural environment, as well as the integrity of the planning system.

**Actions for the forthcoming Water White Paper**

7. The Natural Environment White Paper highlighted our critical dependency on freshwater ecosystems. In the NEWP, the Government stated:

> ‘We will reform the abstraction regime. The new regime will provide clearer signals to abstractors to make the necessary investments to meet water needs and protect ecosystem function. We will also take steps to tackle the legacy of unsustainable abstraction more efficiently.’

WWF-UK welcomes these new commitments. They are essential to protect freshwater biodiversity and help us manage in the context of increasing hydrological stress and uncertainty as the climate changes. We are hopeful that the forthcoming Water White Paper (WWP) will include the actions for ensuring these commitments are delivered. These are:

**Develop a firm timetable and a clear process to reform the water abstraction regime so that all licences reflect environmental limits**

8. It is vital that the Government includes a clear statement that it intends to reform all abstraction licences to reflect environmental limits, with a timetable for doing so by 2027 at the latest. Water companies need clarity as soon as possible in order to minimise the impact of changes on water resources – and the pressure on customers’ bills. The longer water companies have to plan, the more cost effective the solutions they are likely to be able to deliver – short term planning tends to lead to high expense solutions (such as desalination). The Government must set out a process that encourages early and voluntary action (by use of incentives) before 2027, and send a clear signal that 2027 is the ultimate backstop when licences that have not been reformed in a satisfactory manner by then will be subject to compulsory reform.

**Commit to funding solutions via the 2014 periodic review for the rivers where water company abstraction damage is officially confirmed**

9. There are 170 outstanding sites affected by water company abstraction under the Environment Agency’s Restoring Sustainable Abstraction programme – sites where a significant risk of environmental damage is confirmed. In the WWP, the Government must ensure that solutions for these sites can be funded in the 2014 periodic review.

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3 2027 is the ultimate deadline for good ecological status under the Water Framework Directive.
Reform abstraction charges to reflect the value of water

10. The NEWP placed great emphasis on valuing ecosystems services including those provided by rivers. Both the Walker\textsuperscript{4} and Cave\textsuperscript{5} reviews recommended that reforms to abstraction licensing and water charging arrangements were needed to reflect the true value of water taken from the environment. The WWP should include a commitment to reform abstraction charges by introducing volumetric and scarcity based charging in order to better reflect the full environmental value of water.

Develop a strategy for implementing the Walker Review recommendation to introduce meters in 80% of households by 2020, alongside tariffs to protect vulnerable customers and deter waste

11. The only way to truly address affordability issues is to develop social tariffs hand-in-hand with a strategy for widespread metering. By 2015, 50% households in England and Wales will pay for the water via a meter; based on ‘business as usual’ it will be 80% by 2030. The question is not so much ‘should we move to meters?’ but ‘when?’ The WWP must include a commitment to implement the Walker Review recommendation of 80% household metering by 2020. It should enable the cost-effective roll out of metering and the introduction of tariff schemes to protect vulnerable customers and encourage all customers to use water efficiently, as well as measures to help customers through the transition. In addition, the WWP should include a commitment to allow all water companies to install compulsory meters where there is social and environmental benefit in doing so.

Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective?

12. While WWF welcomes the establishment of the Local Nature Partnerships, we have some concerns that the creation of separate bodies to deal with particular local issues (economy, environment) will lead to a siloed approach that does not promote sustainable development at the local level. To be effective, LNPs must be given the same level of support (financial and administrative) and recognition within the planning system as Local Enterprise Partnerships.

Does the proposed natural capital committee have sufficient powers?

13. WWF welcomes the intention set out in the NEWP to establish a Natural Capital Committee. This is likely to be a useful addition to current structures, complementing the work of the Climate Change Committee. We would like to see it playing a similar role:


\textsuperscript{5} Professor Martin Cave. (2009). Independent review of competition and innovation in water markets. For Defra.
monitoring progress towards biodiversity and natural capital targets; providing policy recommendations (the wording in NEWP is ambiguous on this point); and considering impacts outside the UK. Although of course the conservation of UK natural capital is important, as previously mentioned, UK economic activity also has very significant impacts on natural capital overseas. It is important to research and find equitable ways to reduce these impacts. Within the UK, the conservation of natural capital should be part of what the phrase ‘sustainable development’ is taken to mean within the planning system, and we would like to see the Natural Capital Committee explicitly highlight this aspect of its remit.

What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

More research on suitability of Impact Assessments in taking the value of nature into account in policy appraisal

14. We welcome the Government’s commitment in the NEWP to publish new guidance on valuing the natural environment in appraisals. Currently the main mechanism for this is Impact Assessments which are based on Social Cost Benefit Analysis. In order to integrate the value of nature in this process, the impact of policy options on ecosystem services and biodiversity is estimated in monetary terms. Although environmental valuation methods are improving there remain a range of problems and challenges with this approach. For example:

- Much hinges on the valuation method used. Different methodologies applied to the same valuation question can lead to different results. Results may be precise in monetary terms but not precise in representing ‘true’ costs or values.
- Valuation methods based on ‘willingness to pay’ may lead to valuations lower than are required to ensure sustainability of ecosystem services and biodiversity in the context of environmental limits.
- Valuation processes are time-consuming and expensive, and there are significant challenges in taking results from previous studies and applying them to different environmental contexts (i.e. ‘benefits transfer’).
- Large-scale but uncertain costs and benefits over the long term tend to have much less weight than short-term costs and benefits in the appraisal process. This can lead to a bias against conservation of ecosystem services and biodiversity in decision making.  

15. More research is required not only to improve the capturing of monetary values, but also to develop consensual, multi-criteria, multi-stakeholder valuation processes that capture values that cannot be meaningfully quantified in monetary terms. These include some cultural services, supporting services (such as nutrient cycling) and the intrinsic value of nature. In addition, further research is required to ensure economic models used by the Treasury better take into account effects on, and of, natural resource use and environmental degradation.

WWF-UK’s full response to the Government’s consultation on the Natural Environment White Paper can be accessed here:

21 September 2011
Written evidence submitted by Wildlife and Countryside Link (NEWP 35)

1. **Wildlife and Countryside Link (Link)** welcomes;

1.1 That Government will enable partnerships to establish NIAs based on local assessment of opportunities for restoring and connecting nature on a significant scale and the commitment to provide £7.5m over the Spending Review period to further this priority.

1.2 The commitment and funding to support LNPs. We have concerns about how local delivery will be linked to national ambitions, and how LNPs will fit into the planning system, and believe Defra and CLG should provide further details respectively.

1.3 The commitment to embed the value of nature in our economy and the establishment of the independent Natural Capital Committee reporting to the Chancellor. We look forward to the panel announcement and the publication of the ‘roadmap to a green economy’.

1.4 The commitment to create 200,000ha of new priority habitat.

2. **Link believes the following should be improved;**

2.1 For the NEWP to be successful it is imperative that there is early action across all Government departments to deliver on the commitments outlined. The strategies planned during 2011 should include more detail on implementing action.

2.2 There are good statements in the NEWP about planning and protection of our natural environment. However, it makes clear that economic growth will be top priority for the forthcoming NPPF and a recent Government amendment to the Localism Bill declares local financial considerations can be a material factor in planning decisions. These put at risk the NEWP’s ambitions and could have serious consequences if not addressed.

2.3 We were disappointed that a mandatory deadline to halt the use of peat was not included. The voluntary approach has failed to achieve the previous Government’s target for peat replacement. We feel that it is unrealistic for a voluntary approach to achieve the proposed targets.²

2.4 A voluntary approach for biodiversity offsets is of concern. In Defra’s consultation we outlined that there was no clear roadmap to achieving offsets and this has not been rectified through the NEWP³. We believe the Government should intervene with the right mix of regulation and incentives whenever progress on wildlife and habitats is stalling.

2.5 The NEWP recognises the need for a well managed network of MPAs, but fails to commit to the 2012 international obligation for designation. Without

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1 Link brings together over 30 voluntary organisations concerned with the conservation and protection of wildlife and the countryside (see Annex 1).

2 Link response on peat replacement in horticultural use

3 Link response on biodiversity offsets
proactive conservation objectives and management measures, the Government risks MPAs being nothing more than paper parks.

2.6 Clear measurable outcomes for recovery of our vulnerable species and habitats, and mechanisms to deliver them, must be included in the England Biodiversity Strategy.

3. **Government should rectify the following omissions;**

3.1 A clear funding strategy. For example, Lawton estimated between £0.6bn and £1.1bn to restore our natural environment. Although the funding for NIAs is welcomed, the ambitions in the NEWP are out of step with the resources available to achieve them.

3.2 It fails to fully recognise the importance that access and recreation play in facilitating people’s understanding and enjoyment of the natural environment. It also ignores the future of coastal access in England.

**Annex 1**

Link brings together over 30 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and the marine environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage 690,000 hectares of land.

Link welcomes the ambition laid out in *The Natural Choice*, which outlines the Government’s commitments to restore our natural environment and the work done by Defra to produce this White Paper. However, some of the commitments lack detail and Link will be looking for early evidence of robust implementation plans to ensure positive changes are made. Before the publication of the White Paper Link devised six key tests which we lobbied to be included in the NEWP.

This response is supported by the following 20 organisations;

- Bat Conservation Trust
- British Mountaineering Council
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign to Protect Rural England
- Campaign for National Parks
- Friends of the Earth England
- The Grasslands Trust
- International Fund for Animal Welfare
- National Trust
- The Mammal Society
- Open Spaces Society
- Plantlife


5 Link’s key tests [http://www.wcl.org.uk/docs/link_key_tests_for_newp_080311_final.pdf]
• Ramblers
• Royal Society for the Protection of Birds
• Salmon & Trout Association
• Wildfowl & Wetlands Trust
• The Wildlife Trusts
• Woodland Trust
• WWF-UK

21 June 2011
1. Introduction

1.1 This response is supported by the following Wildlife and Countryside Link members;

- British Mountaineering Council
- Butterfly Conservation
- Campaign for National Parks
- Friends of the Earth England
- The Grasslands Trust
- The Mammal Society
- Open Spaces Society
- Plantlife
- Ramblers
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- Wildfowl & Wetlands Trust
- The Wildlife Trusts
- Woodland Trust

2. Ambitions

2.1 Ambition

2.1.1 As in our previous EFRA Committee evidence, Link welcomes many of the ambitions in the White Paper, including the commitment to provide £7.5m over the Spending Review period on Nature Improvement Areas (NIAs) for restoring and connecting nature on a significant scale; the commitment to embed the value of nature in our economy and the establishment of the independent Natural Capital Committee reporting to the Chancellor; the measurable targets on sites and increase of priority habitats.

2.2 Species

2.2.1 A glaring omission from the White Paper was the lack of focus on species, in particular those most threatened with extinction. Despite publication of Biodiversity2020† we still have major concerns that our international commitments to

halt this fundamental loss of biodiversity are not adequately addressed in Government policy.

2.2.2 Biodiversity2020 specifies targeted action for species only where these are not picked up by habitat/ecosystem measures. A plan should be in place to identify which species fall into this category. In addition, there must be guidance to incentivise or ensure priority species\(^2\) are integrated in habitat and landscape initiatives. Currently, the NIA competition criteria make no mention of species.

2.2.3 To sufficiently address priorities for species and habitats, Local Nature Partnerships (LNPs) need a national framework of biodiversity ambition; advice and expertise to support local delivery (see section 3.2). Biodiversity2020 makes no reference to wildlife legislation, or using regulation where voluntary measures fail (see section 3.6).

2.3 People and access

2.3.1 The ambitions are good as far as they go, but they are not sufficiently backed up with a clear plan for delivery.

2.3.2 Local authorities and other decision makers should place the importance of informal outdoor education and recreation at the centre of all decisions they take, recognising that access to investment in the natural environment and people’s ability to enjoy it can reduce the cost of health and social services. Everyone should have access to high quality experiences in the outdoors. Specifically, we would like to see every school child given opportunities to experience the natural environment, for example landscapes and outdoor activities offered National Parks.

3. Implementation

3.1 Funding

3.1.1 A lack of a clear funding strategy is still of concern. Lawton estimated between £0.6bn and £1.1bn per year to restore our natural environment\(^3\). Seed-corn funding for NIAs is welcomed, but the ambitions in the White Paper are out of step with the resources available to achieve them for example the concept of NIAs should be rolled out across the whole of England and embedded in local policy e.g. Local Plans, and could provide a mechanism for targeting biodiversity offsets, but this is not made clear in the White Paper.

3.1.2 The Common Agricultural Policy (CAP) is the single largest resource available to deliver the land management ambitions in the White Paper. Current negotiations

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\(^2\) 943 species are listed under the NERC Act 2006 as ‘of principal importance for the conservation of biodiversity in England’

could see a reformed CAP with a reduced agri-environment budget, and greening measures affecting 30% of Single Payment. It is vital that the UK position is led by Defra, to protect the agri-environment budget and ensure the greening measures are not EU greenwash.

3.2 Making voluntary initiatives work

3.2.1 Link members are committed to working with Government and other partners to make LNPs and NIAs successful. However, given the delivery pressures, we are surprised at the haste with which Defra has rolled them out and the lack of supportive structures or any national guidance to ensure they succeed.

3.2.2 Much more needs to be done with these initiatives for them to make a meaningful contribution to the ambitions of the White Paper;

3.2.2.1 Their success criteria must be defined nationally. Defra needs to show how the delivery achieved by LNPs and NIAs will contribute to the measurable ambitions of the White Paper (e.g. increase of 200,000ha of priority habitat and the outcome for priority species). We recommend that Defra provide a national framework showing the priority species and habitats that need to be delivered and tie the monitoring of delivery to this framework. This should form the basis of advice provided to LNPs and NIAs by Natural England.

3.2.2.2 Defra should have a clear role in championing LNPs within government and must commit to removing obstacles to their delivery. These roles should be clarified in a public statement.

3.2.2.3 CLG should advise Local Enterprise Partnerships (LEPs) that they should nominate a representative to sit on LNPs and a representative of LNPs should be invited to attend the LEPs. The wording in the White Paper ‘we would encourage LEPs and LNPs to work together’ is inadequate and the links between these two initiatives must be stronger.

3.2.2.4 Government should clarify to local authorities that meeting their responsibilities under the biodiversity duty includes supporting species recovery, habitat restoration and recreation, and working with LNPs.

3.2.3 Given the pressure on voluntary initiatives, we welcome the commitment in the White Paper to review in 2012 the Campaign for the Farmed Environment and other initiatives to assess more generally the effectiveness of this kind of voluntary industry-wide approach (2.48). We recommend that this review be extended to LNPs and NIAs in future years.
3.2.4 The White Paper recognises the need for a well managed network of MPAs, but fails to commit to the 2012 international obligation for designation. Without proactive conservation objectives and management measures, the Government risks MPAs being nothing more than paper parks.

3.3 Planning

3.3.1 To deliver the White Paper objectives for planning reforms, we recommend that:

3.3.1.1 The balance of economic with environmental and social sustainability in the National Planning Policy Framework (NPPF) is readdressed. The White Paper states that the NPPF will set out our environmental, social and economic objectives for the planning system and explain how they relate to each other (2.37). However, the NPPF’s current emphasis on economic growth, alongside a weak definition of sustainable development, fatally undermines the integrated delivery of social, environmental and economic sustainability, and ultimately the statutory purpose of achieving sustainable development as set out in section 39 of the PCPA 2004.

3.3.1.2 LNPs and NIAs are incorporated into paragraph 168 of the NPPF. The White Paper commits to ecologically coherent planning, states, we will retain protection and improvement of the natural environment as core objectives for local planning and development management (2.35), and notes the role of planning in the development of NIAs (2.30, p.21).

3.3.1.3 Include clear policy to achieve the objectives of NIAs and Green Infrastructure and identify these within local plans

3.3.1.4 The caveat about overriding the need for development in relation to key habitats in paragraph 169 of the NPPF is removed.

3.3.1.5 The NPPF provides greater recognition and stronger protection for Local Wildlife Sites and national priority species and habitats.

3.3.1.6 The NPPF provides greater clarity on the definition and criteria for the new Local Green Space designation (or reference guidance on this).

3.3.1.7 The NPPF’s core principles (paragraph 19) include: the recognition of the natural environment and the natural resources it provides as central to sustainable economic growth and quality of life; the precautionary principle.

3.3.1.8 The NPPF provides more comprehensive policy and guidance on the evidence base required to establish the local strategic priorities for the protection and enhancement of the natural environment.
3.3.1.9 The Government provides guidance on transitional arrangements around the introduction of the NPPF.

3.4 Cross-Government

3.4.1 All Government departments need to show their strategy and implementation plan for meeting the commitments under the White Paper and Biodiversity 2020. This has yet to be done. This should include clear plans and timetables for the UK’s rapid action to ensure delivery of the new 2020 Aichi targets so that the Government shows early progress.

3.5 Barriers to connecting people with nature

3.5.1 The White Paper fails to mention that public rights of way are the most important means by which people gain access to the countryside, and many are in a poor state of repair or unsigned. Government must ensure that local authorities have the resources and expertise to guarantee that all public paths are recorded, open and accessible, as required by law. They should coordinate maintenance and publicity, enabling volunteers to be involved.

3.5.2 Many urban authorities do not have official maps of public paths; Government should encourage them to produce such maps before the paths are lost under development.

3.5.3 We welcome the proposals to proceed with the recommendations of Natural England’s working group on unrecorded rights of way and urge Government to implement these urgently.

3.5.4 Government must recognise that access to moorlands, mountains, wild spaces and coastline, away from routes, is fundamental to many people’s recreational experience. Open-air recreation should be recognised as a key way in which the public connects with nature. Government should continue to promote the benefits and opportunities for, all types of quiet, open-air recreation and support existing bodies in the delivery of public access and wider recreational opportunities.

3.5.5 Much of England’s spectacular coastline is currently inaccessible. Government must commit to a timetable for opening stretches of the English coastal path each year; there should be rights for riders and cyclists as well as walkers.

3.5.6 We welcome recommendation 65 on green spaces designation but this should take account of existing knowledge such as the Woodland Access Standard⁴ or the Accessible Green Spaces Standard⁵ to ensure people have accessible green spaces.

⁴ http://frontpage.woodland-trust.org.uk/woodsforpeople/finalreport/was.htm
⁵ http://www.naturalengland.org.uk/ourwork/enjoying/places/greenspace/greenspacestandards.aspx
within walking distance of where they live. The present law enabling local people to register as village greens land which has been used informally for 20 years should be retained. The lack of readily accessible green space is also a barrier to outdoor learning and volunteering, as few schools have the resources to travel long distances. Other barriers to outdoor learning include lack of knowledge and could be addressed through initiatives such as the Forest Schools initiative.6

3.6 Regulation

3.6.1 Link believes that legislation to improve the environment and animal welfare is a fundamental and necessary approach to the protection of the natural environment. We do not support the view that regulation should be a measure of last resort, and question the apparent lack of recognition in the White Paper that regulation can be a positive driver of innovation and economic development.

3.6.2 Regarding the Red Tape Challenge, currently with a spotlight on environmental legislation, we are very concerned that all 278 pieces of environmental legislation and regulations are included in the review which seems a contradiction to some of the commitments outlined in the White Paper. Link has some major concerns about the lack of an evidenced based approach and transparency to this process. The Government must ensure that the laws in place to protect wildlife are not undermined. The environment is an area where knowledge on threats posed by environmental change is still growing and therefore the one out model is especially inappropriate.

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6 The Forest Schools6 initiative is an example of how to reconnect children with the natural environment which could be used as a template for future developments http://www.forestschools.com/
Annex 1

- What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

See section 2.3, 3.2, 3.4 and 3.5

- Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

See section 3.2

- What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

See section 3.1, 3.2 and 3.6

- Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

See section 3.5

Annex 2

Wildlife and Countryside (Link) brings together over 30 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and the marine environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage 690,000 hectares of land.

26 September 2011
Written evidence submitted by CEMEX UK (NEWP 36)

CEMEX welcomes the opportunity to contribute to the Environment, Food and Rural Affairs Select Committee’s inquiry on the Natural Environment White Paper

Our submission is based on CEMEX’s experience of committing to an ambitious 10-year Biodiversity Strategy, which means we are well positioned to provide a view on how other companies can meaningfully contribute to the natural environment.

About CEMEX
CEMEX is a global provider of building products including aggregates, cement and building products. In the UK, we generate annual sales of £1 billion and employ 3,500 people across 450 sites and are a significant land holder, managing approximately 10,000 hectares.

Protecting and creating biodiversity
As a major extractor of minerals, we realise that our business has consequences for the environment. We take our responsibilities very seriously and have restored numerous areas to high conservation standards, including SSSI, SAC or other general nature reserves with important habitats. Good examples are the marshland habitat at Denge Quarry (Kent), an important refuge for water birds and home to unusual plants and invertebrates, and the 145 hectares Attenborough Nature Reserve (Nottinghamshire), which opened in 2005 and is now a Site of Specific Scientific Interest.

In 2010, we began a national long-term partnership with RSPB to provide a strategy for embedding biodiversity in our business.

CEMEX UK Biodiversity Strategy 2010-2020
We employed a full-time RSPB adviser to consult with our operations and help develop a goal-driven strategy, which was launched in September 2010. We have committed to:

- Creating and maintaining 1,000 hectares of UK Biodiversity Action Plan (BAP) priority habitats by 2020. This is the size of around 1,300 football pitches.
- Establishing biodiversity flagship sites
- Empowering employees to take biodiversity action
- Working in partnership for biodiversity
- Champion biodiversity to promote its benefits and importance

From our experience
- Key to developing a cost-effective biodiversity programme is pre-planning and ensuring that any actions are embedded into operations. For instance, if our site restoration planners factor in RSPB’s recommendations at an early stage, a better biodiversity outcome can be achieved for the same cost.
- The Government is right to try to motivate businesses by pointing to the ‘business case’ for protecting biodiversity. With regards to minerals extraction, companies are also more likely to secure future reserves if they can show the relevant local authorities their track record of restoring quarry sites to the highest standard.

CEME’s unique biodiversity strategy can be viewed at www.cemex.co.uk and both CEMEX and the RSPB would be pleased to provide oral evidence on how the private sector can support the
public sector in this area. Members are also welcome to visit CEMEX’s restored sites to understand the restoration process better.

More about CEMEX – Beyond biodiversity
Placing an emphasis on biodiversity is just one of the ways we are trying to become a more sustainable company. This sits alongside:

- Replacing over 17 million lorry miles with more rail transportation during 2009.
- A 15% water usage reduction in 2009.
- Investing in utilising unrecyclable household waste as a fuel in our cement kilns – in 2009, we saved over 160,000 tonnes of CO₂, the same emissions as around 64,000 cars produce in a year.
- Investing £49m in 2009 on a new grinding plant in Tilbury (Essex) that uses 20-40% less energy than traditional plants.
- In 2010, being the first company in our sector to develop carbon labelling for its products.
- Pledging to reduce our net 2015 carbon emissions, per tonne of product, by 25%, based on 1990 levels.

21 June 2011
Written evidence submitted by The Wildlife Trusts (NEWP 37)

1.1. The Wildlife Trusts (TWT) welcome the ambition contained within the White Paper. However, there is insufficient detail to be confident that Government is fully committed to making the vision a reality, nor is there the sense of urgency required or sufficient targeted resources. We are disappointed it fails to commit to enshrining the aspirations in law.

2. The Wildlife Trusts support:

2.1. Clear recognition of the need for restoration and recovery of the natural environment at a landscape scale.

2.2. The commitments to encourage, support and recognise Local Nature Partnerships (LNPs). TWT have been delivering landscape-scale conservation with farmers, landowners, local communities and those whose primary concerns are economic regeneration, health or well-being on a voluntary basis for years. The LNPs need to recognise these initiatives, the work of LBAPs and be driven and supported with sufficient funds and Government commitment.

2.3. The commitment to establish Nature Improvement Areas (NIAs). However, we are concerned that there is no statutory underpinning and identifying just 12 initially, seriously underestimates the magnitude and extent of restoration required. In addition, there is no clear commitment for NIAs to be recognised in the new strategic framework for planning. TWT has over 100 Living Landscape schemes, all deserving greater recognition and support. Funding of just £7.5 million is simply not enough. The promise to maximise the contribution Environmental Stewardship and Woodland Grant Scheme make towards promoting the multiple benefits from ecological restoration at a landscape-scale is welcomed.

3. The Wildlife Trusts believe the following could be improved:

3.1. The mismatch between ambitions contained in NEWP and the focus on growth within forthcoming planning reforms could undermine the NEWP’s good intentions. The NPPF must reflect the commitments in NEWP if the Nagoya goal of mainstreaming biodiversity across government is to be achieved.

3.2. The voluntary, industry-led approach to phasing out horticultural peat will not succeed and needs statutory underpinning. The Task Force must address all options including legislation and hasten the speed of the phase out.

3.3. Lawton recommended Government produce a strategy for carbon-rich soils and peatlands. This is absent from the NEWP.

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1 The Wildlife Trusts (TWT) consists of 47 individual organisations covering the whole of the UK, and the Isle of Man and Alderney. All are working for an environment rich in wildlife for everyone. We have more than 800,000 members. Our vision is to create a Living Landscape and secure Living Seas. Each Wildlife Trust is working within its local communities to inspire people about the future of their area.

2 http://www.wildlifetrusts.org/alivinglandscape

3.4. It is disappointing that NIAs and the Green Areas Designation are presented as potential barriers to sustainable development and additional burdens on local authorities rather than a positive economic, social and environmental contribution for local communities.

3.5. Biodiversity offsetting has potential to contribute to restoration of the natural environment and TWT welcomes the pilot approach. However, being voluntary could undermine the concept and jeopardises the impact the pilots could achieve if it was backed with regulation.

3.6. Significant effort will be required from Government and its agencies to ensure integrated and coordinated delivery across the various initiatives proposed in the NEWP.

4. **Government should rectify the following omissions.**

4.1. There is no explicit reference to Local Wildlife Sites and other non-statutory sites. These make a significant contribution to England’s ecological network as important sites in their own right and as buffers and stepping stones to other protected areas.

4.2. There is no apparent national framework within which all new initiatives will be managed. TWT will continue to challenge for new policy and legislation if we feel it is needed to achieve nature’s recovery.

21 June 2011

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4 Commitment 10: Working within the framework of the National Policy Statements and the Government’s planning reforms, local authorities will be able to use local planning to support Nature Improvement Areas, including identifying them in their local plans where they choose, while not deterring sustainable development (page 21).

“We propose that green spaces should be identified in neighbourhood plans and local plans which complement and do not undermine investment in homes, jobs and other essential services” (page 49)

5 For example, Local Nature Partnerships (page 19), voluntary peat partnership (page 29) Catchment-level Partnerships (page 30), Green Infrastructure Partnership (page 51)
1 Introduction

1.1 The Wildlife Trusts (TWT) consists of 47 individual organisations covering the whole of the UK, and the Isle of Man and Alderney. All are working for an environment rich in wildlife for everyone. We have more than 800,000 members. Our vision is to create *A Living Landscape* and secure *Living Seas*. Each Wildlife Trust is working within its local communities to inspire people about the future of their area.

1.2 The Wildlife Trusts welcome the opportunity to submit evidence to the Efra Select Committee inquiry into *The Natural Choice: Securing the Value of Nature*.


1.4 The Wildlife Trusts welcome the ambition contained within *The Natural Choice: Securing the Value of Nature*. We also support the clear recognition of the need for restoration and recovery of the natural environment at a landscape scale. However, there is insufficient detail to be confident that Government is fully committed to making the vision a reality, nor is there the sense of urgency to enshrining the aspirations in law. In addition, the uncertainties surrounding financial support remain a major concern.

2 What actions are required across Government departments, from local government and by civil society to deliver the White Paper's proposals to grow a green economy and reconnect people with nature?

2.1 Due to the complexities involved and given that the White Paper is Government-wide, the **Government needs to show leadership, promote integration and take responsibility for delivery to ensure the NEWP is used as an effective catalyst for the recovery of the natural environment**. Government must demonstrate clear accountability and has a role in stimulating and facilitating action and driving forward the concepts. To be effective, the White Paper must have broader ownership than Defra.

2.2 Whilst the White Paper was being produced, TWT were encouraged by the integration within Defra of the various policy strands and the clear leadership demonstrated by senior civil servants and Ministers. TWT are keen to see this holistic approach maintained and developed as implementation progresses.
2.3 Strong leadership is required to create the framework within which communities can develop local solutions for delivery. Only Government, at both local and national levels, can change policy that causes damage to the natural environment or remove the blockages that currently limit its restoration. There needs to be a sense of purpose and consistency between Defra and CLG to help support local government and ourselves to contribute to the implementation of the NEWP. *Whilst we appreciate that, with Localism, it will be for local areas to decide their priorities, TWT believe that there is currently insufficient guidance to support local authorities and other stakeholders.*

2.4 Central and local Government, agencies, the private sector and voluntary bodies will all need to act in concert to deliver the White Paper’s proposals. The Wildlife Trusts have, for a number of years, promoted a joined-up, landscape-scale approach to the recovery of the natural environment. *We now need central and local Government to work closely with us and not hinder the extensive delivery already happening on the ground.*

3 Will the institutional frameworks outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

Lack of a national framework or spatial vision

3.1 The NEWP states “*We will establish a clear institutional framework to achieve the recovery of nature*” (page 3). Whilst we support the overall vision of the NEWP, we would argue that it does not provide “*a clear institutional framework*”. There is no apparent single framework within which all the new initiatives will be managed and, within the White Paper, there is no clear indication of how the various actions and commitments will be coordinated. Instead, *there is a confusion of disparate concepts with implementation timescales that are not only out of sync but, for some, are also unrealistically short.*

Nature Improvement Areas

3.2 We recognise that NIAs are just one tool for delivering landscape-scale conservation. For example, TWT now has over 100 Living Landscape schemes, all deserving greater recognition and support. *We believe that restoration and recovery of the natural environment must take place with greater urgency and across a much larger area than proposed in current plans.* The NIA concept should be driven forward everywhere across England and be given formal and statutory recognition through the new planning process and agri-environment grants. The Wildlife Trusts will keep up pressure on the Government to deliver against its vision. We will continue to challenge for new policy and legislation, if we feel it is needed, to secure nature’s recovery.

3.3 The Wildlife Trusts have long held that a partnership-led, landscape-scale approach to conservation is the only way to secure nature’s recovery. Whilst we welcome the concept of
Nature Improvement Areas, as based on the original vision of Ecological Restoration Zones in *Making Space for Nature*, we are concerned that the decision to pilot 12 NIAs, via a competitive process, will result in a delay in Government roll-out of the approach across England until 2015 at the earliest. There is currently no clear framework or even understanding about how Government will expand the approach beyond the 12 pilots or indeed, a process for recognising, as NIAs, the applications to the competition that are unsuccessful. A high number of applications are expected. Action must be taken now to develop a strategy to make the best of the full range of applications, to capture the experience of these projects and to build-on and support the partnerships that have been mobilised in recent months and years.

**NIAs and Planning Reforms**

3.4 The NEWP makes explicit reference to how the planning reforms will support the development of Nature Improvement Areas (e.g. para 2.29, page 21). However, opportunities to embed the NIA concept in other key government policies and strategies are being missed. The draft National Planning Policy Framework, currently out for consultation, does not include reference to NIAs or Local Nature Partnerships. This omission undermines the concept and reduces the ability to successfully deliver the ambitions of the NEWP.

3.5 In addition, it is disappointing that within the NEWP, NIAs and the Green Areas Designation are presented as potential barriers to sustainable development and additional burdens on local authorities (commitment 10, page 21; para 4.23, page 49) rather than a positive economic, social and environmental contribution for local communities. CLG appear concerned that NIAs and the Green Areas Designation might limit development. However, TWT consider that these initiatives should not be seen as a block to development as they will make a positive economic, social and environmental contribution to local communities, quality of life and to ecosystem services as evidenced by the NEA.

**NIAs and landscape-scale conservation**

3.6 Within the NEWP and NPPF, there are no explicit reference to Local Wildlife Sites and other non-statutory sites despite *Making Space for Nature* emphasising their importance. These sites make a significant contribution to England’s ecological network as important sites in their own right and as buffers and stepping stones to other protected areas. As it currently stands, the NPPF is failing these sites which are essential components within ecological networks.

**Local Nature Partnerships**

3.7 TWT support further encouragement to ensure there is total coverage across England and for Local Nature Partnerships (LNP) to be tied into the accountability process through statutory agencies and central Government.
3.8 We welcome the suggestion that LNPs should have a broad remit and be wide-reaching in their membership. The NEWP includes the expectation that LNPs and Local Enterprise Partnerships (LEPs) work together. The information published on the Defra website (http://www.defra.gov.uk/environment/natural/whitepaper/local-nature-partnerships) suggests LEPs should be on the membership of an LNP. However, LEPs have been given no such direction and do not have to have a natural environment representative. There is anecdotal evidence to suggest that LEPs are unlikely to engage with the LNP agenda. **There needs to be a stronger steer to LEPs that they are expected to engage with LNPs to develop shared agendas for their area.**

3.9 At this stage, it is hard to judge the effectiveness of the framework for establishing LNPs. It appears to be an evolving concept as the complexities involved become apparent to Defra. For example, the end of July deadline for LNP applications demonstrated a lack of understanding of civil society as eight weeks (from launch of the NEWP to the deadline) was not sufficient to develop new partnerships broader than those already in existence or development.

3.10 We are concerned that **there is insufficient guidance following the NEWP to fully support the development of these new partnerships in the innovative and creative way envisaged.** In addition, the links between LNPs and other initiatives, such as NIAs, the biodiversity offsetting pilots and perhaps crucially, delivery of the England Biodiversity Strategy, have not been articulated. Worryingly, the confusion amongst practitioners is resulting in some choosing not to fully engage.

**Biodiversity offsetting**

3.11 Biodiversity offsetting has the potential to contribute to restoration of the natural environment and TWT welcomes the pilot approach. However, being voluntary could undermine the concept and jeopardises the impact the pilots could achieve if it was backed by regulation. TWT also believe that there should be more explicit links between the biodiversity offsetting pilots and all NIAs – not just the 12 selected as in receipt of funding.

**Peat**

3.12 The voluntary, industry-led approach to phasing out horticultural peat will not succeed and needs statutory underpinning. The Peat Task Force must address all options including legislation and hasten the speed of the phase out.

3.13 In addition, *Making Space for Nature* recommended Government produce a strategy for carbon-rich soils and peatlands. The NEWP would have been an ideal platform for a commitment on this. Instead, the “Government Response to the *Making Space for Nature* review” (published on the same day as the NEWP), suggests that Defra will just be investing to improve the evidence base on the complex issues raised by peat.
What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper's ambition to fully embed the value of nature into policy delivery?

4.1 TWT welcome the recognition of the NEA within NEWP and support the commitment to further research and implementation (para 2.6, page 15). It provides a robust, evidence-base that needs to drive future policy and decision-making. We believe TWT has a role as helping to develop thinking and applying principals at the local level. We would like to see the intention to “develop practical tools to assist decision-makers in applying the lessons of the NEA” initiated and applied with urgency. It is essential that we now move on to the delivery phase to capture and build on what has been learnt through the NEA.

What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?

5.1 The Wildlife Trusts has previously undertaken research into how the concept of ecological networks has been incorporated into policies and legislation in several European countries comparable to the UK. As would be expected, the approaches vary depending on the constitutional structure of each country. Clear lessons taken from these studies are that without policy integration and statutory obligations, the approaches proposed in the White Paper might not be successfully applied or be sustained in the long term. For example, it is acknowledged that the significant progress made in the Netherlands in implementing their Ecologische Hoofdstructuur (National Ecological Network) has been as a result of an ambitious programme of policy integration. The concept was endorsed by three Ministries (Agriculture, Nature Management and Fisheries; Housing, Spatial Planning and Environment; and Transport, Public Works and Waste Management).

5.2 In addition, relatively good progress has also been made in Germany towards the creation of a functional ecological network. Germany imposed a statutory obligation to establish a nationwide ecological network with a requirement on states to integrate the network into spatial planning and nature conservation policy.

What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

6.1 TWT supports the implementation of recommendations 17 and 20 from Making Space for Nature. However, neither are fully reflected within the NEWP.

6.2 Making Space for Nature also estimated that between £0.6bn and £1.1bn each year is required to restore our natural environment. Whilst we acknowledge the commitment to fund 12 NIAs to the tune of £7.5m over three years, the absence of a funding strategy to deliver the
other ambitions is very disappointing. The NEWP sets the agenda for nature’s recovery into the future. Whilst we may currently be in a time of austerity, this should not prevent us planning for the future. **The NEA clearly demonstrates that investing in nature now makes economic sense.**

**Payments for ecosystem services**

6.3 Government needs to remain committed to amending existing frameworks to reward farmers for delivering valued goods and services (see Box 1). Such resources should be focused on securing sustainable land management that safeguards our natural environment, including our wildlife and also the services that land provides, such as clean water, carbon storage, flood alleviation and food. Food security is dependent upon a healthy natural environment of which wildlife is a key component and indicator. There will be a need for the provision of easily accessible advice and ongoing support to ensure consideration of this full range of factors. Government also needs to stimulate new markets in ecosystem services.

**Box 1 – Working Wetlands, Devon Wildlife Trust**

The Devon Wildlife Trust’s Working Wetlands project is a 7-year Living Landscape initiative established in 2008 and working in the Culm area of northern Devon. The project focuses on 65,000 hectares of land which represents the headwaters and main tributaries of 4 major rivers (Taw, Torridge, Exe and Tamar) where concentrations of wildlife-rich habitats are found, including internationally important Culm grasslands and populations of rare species such as Marsh Fritillary butterflies. Working Wetlands aims to support farmers to maintain these wildlife-rich habitats in good condition, and to restore or re-create habitats that have been neglected or lost.

Working Wetlands has joined forces with South West Water (SWW). Between 2010 and 2015 SWW will invest almost £9m in their *Upstream Thinking* initiative, which aims to provide clean water through helping landowners choose farming methods which enhance water quality while also protecting natural resources and improving the quality of wildlife habitats. SWW has calculated that the benefit-to-cost ratio of *Upstream Thinking* is over 65:1. By investing in restoration of the natural environment to achieve cleaner and more reliable water supplies the company can reduce costly and energy-intensive water treatment projects.

6.4 The loss of the Aggregates Levy Sustainability Fund is a major concern for TWT. The Aggregates Levy was an example of a fiscal measure which encouraged the increased use of recycled aggregates and alone generated some £20m *per annum* for community environmental projects in the eight years it was operating (2002-2010). This funding provided critical investment in the development of landscape-scale approaches.
Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

7.1 The NEWP includes some laudable commitments relating to children and young people accessing the natural environment but there is no clear framework for achieving the ambitions. In addition, other than encouraging volunteering, there is no practical support and little mention of either engaging adults or of the enjoyment of recreation.

7.2 The Wildlife Trusts believe that a locally-derived, spatial approach is a practical way to unite policy and people and that communities should be empowered to take action. LNPs should have provided the mechanism for this. However, the speed at which applications had to be submitted for the transition funding has meant that, potentially, opportunities for wider engagement and involvement with local people has not be sufficiently adopted.

7.3 Voluntary organisations, like TWT, have a long track record and critical role in providing opportunities for people to experience, undertake and take action for the natural environment. We have 800,000 members and, in 2009/10, amongst other things, we organised 9,400 local events attracting 310,000 people, led nearly 3,500 local walks, made more than 4,500 outreach visits to schools, engaging over 156,000 students, and coordinated over 35,000 volunteers. However, providing volunteering opportunities does not come free. The management and supervision of local action requires significant investment, support (in the form of staff time, training, personal protective equipment (PPE), and liability insurance) and good governance. These costs should not be underestimated and could act as a limiting factor on our capacity to engage volunteers on local action. The NEWP has done little to address these concerns which we raised during the consultation period.

26 September 2011
Written evidence submitted by the Central Association of Agricultural Valuers (NEWP 38)

1) We welcome the recent of the Natural Environment White Paper (NEWP) which we see as a driver for many aspects of policy. We would however like raise some practical issues with regard to particular areas in the Paper.

2) “Landscape scale” working – This concept appears several times in the Paper and is also included in the Natural England report “ThinkBIG” published to coincide with NEWP. Whilst we accept that a broader coverage of targeted environmental management may result in better outcomes, we would urge that any such “landscape scale” approach remains voluntary and accepts the extent to which land occupation and business structures alter over time, for example during the term of an Environmental Stewardship agreement. This is often not appreciated by Government in the design of policy. There must be sufficient flexibility.

3) Integrated advice – The work that has been commissioned by DEFRA on this only seems to be focussing on a restricted area of advice and is not currently addressing the various advice delivery mechanisms available and the way in which those separate areas of advice may be integrated.

3.1 It would seem that there is a longer-term aspiration that the wider delivery of advice by Government and its associated delivery bodies be addressed and that Environmental Stewardship, Woodland Grant Scheme, cross compliance, etc., advice be better incorporated in an overall advice provision strategy. This will be useful provided it is is properly integrated, with suitably qualified advisers who can also appreciate the wider context in which they may be offering advice to a farmer, appreciating land occupation and business structures, taxation implications, etc., as well as providing the core advice on climate change or whatever it may be.

3.2 We would emphasise the importance of making use of the qualified professional adviser in the provision of such advice and proper recognition of their professional qualification. Such advisers have had to gain the breadth of knowledge which is necessary when going out on holdings to provide advice. One area of advice segregated from all other aspects may have unknown implications which are not necessarily of benefit to the farmer. This would be a concern of the approach currently being looked at.

4 ELS becoming more targeted – Whilst we accept that there is a strong drive to better demonstrate to the taxpayer value for money, we would express concern that Entry Level Stewardship (ELS) becomes too targeted. ELS was designed to be ‘broad and shallow’ in its approach, with Higher Level Stewardship (HLS) being the targeted, competitive element of Environmental Stewardship. A balance needs to be struck between encouraging farmers to participate in ELS and therefore being realistic about what management options they can feasibly deliver on the ground and the delivery of multi-objective, environmental outcomes.

5 Woodland creation – We are not clear how the ‘major increase’ in the area of woodland is to be achieved in a climate of decreasing availability of funding. Whilst we accept that there is an Independent Panel looking at this aspect, it would have been helpful if the Paper could have said more about how this aspiration may be met.

21 June 2011
BSI is the UK’s National Standards Body and facilitates the development of national, European and International (ISO) Standards. BSI has a long history of developing standards to help organizations implement good practice and specifications for products to ensure consumer protection and provide assurance.

BSI is establishing a technical committee to national standards to aid the conservation the biodiversity of the UK through the planning and development process. The programme of work will support the aim of protecting the UK’s biodiversity outlined in the Natural Environment White Paper. The first standard to be produced by the technical committee will provide guidance on the quality of ecological information submitted with planning applications and enable planning authorities to make better informed decisions when considering these applications. The committee will also produce guidance which will translate the new high level National Planning Policy Framework objectives into robust local plan policies and practical approaches to development control on the ground.

The following organisations have committed to be on the committee: Defra, the Association of Local Government Ecologists (ALGE), Northern Ireland Environment Agency and the Institute of Ecology and Environmental Management (IEEM).

BSI Background

BSI is the UK’s National Standards Body, incorporated by Royal Charter and responsible independently for preparing British Standards and related publications. BSI has 110 years of experience in serving the interest of a wide range of stakeholders including government, business and society.

BSI presents the UK view on standards in Europe (to CEN and CENELEC) and internationally (to ISO and IEC). BSI has a globally recognized reputation for independence, integrity and innovation ensuring standards are useful, relevant and authoritative.

A BSI (as well as CEN/CENELEC, ISO/IEC) standard is a document defining best practice, established by consensus. Each standard is kept current through a process of maintenance and reviewed whereby it is updated, revised or withdrawn as necessary.

Standards are designed to set out clear and unambiguous provisions and objectives. Although standards are voluntary and separate from legal and regulatory systems, they can be used to support or complement legislation.

Standards are developed when there is a defined market need through consultation with stakeholders and a rigorous development process. National committee members represent their communities in order to develop standards and related documents by consensus. They include representatives from a range of bodies, including government, business, consumers, academic institutions, social interests, regulators and trade unions.

21 June 2011
The following evidence is submitted on a wholly personal basis and does not represent the views of any institution or organisation.

1. The White Paper sets out admirable goals but is short of concrete proposals which can guarantee their achievement. An approach based largely on voluntary actions and partnerships can work well, especially if there is a supportive background in related policy areas (e.g. planning and agriculture), and enthusiasm on the part of all concerned with the capacity to rethink their priorities and develop new working relationships. Unfortunately there must be doubt over whether such a background will exist over the next few years. In particular, the economic position means that all of the public sector bodies involved are likely to be hard-pressed in coping with their established core functions rather than having the scope to devote energies and resources to new initiatives. Meanwhile the emphasis on economic development throughout recent statements on planning policy and the absence of any clear policy on sustainable development, and especially of any priority for ecologically sustainable development, also suggest that concern for nature is not going to be uppermost throughout the planning system.

2. I wish to comment particularly on two points in the paper, the potential to develop biodiversity offsetting (paras.2.38-2.42) and the role of the economic value of ecosystem services (chap.3), and on some generic questions these raise.

**Biodiversity Offset**

3. If use is to be made of offsetting schemes, then there are a lot of questions over design and operation that have to be addressed, as shown by experience in the USA, Australia and the elements of EU biodiversity law where compensatory measures are required. What constitutes an acceptable offset? What forms of action can be regarded as sufficient to balance the definite harm being done today to a site that is being developed? Is guaranteed protection of a currently valuable site enough, will financial commitments be required, is creation of new habitats appropriate and in the face of climate change, is there a role for the establishment of new wildlife corridors and refuges to give wildlife the space to adapt to changing conditions?

4. There are questions over how one measures equivalence, not least identifying a solid baseline against which any action can be measured. Whereas in relation to their impact on global climate change, an increase in greenhouse gas emissions in one place can be directly offset by a reduction at the same time in another place, replacement habitat takes a long time to mature and may never achieve the same richness as pristine areas. Indeed some habitats may be truly irreplaceable. Such issues are particularly challenging in the British context of a crowded island where virtually all habitat has been significantly affected by human activity over many centuries. There is a limited reserve stock of habitat available for promotion to high conservation status.
5. Forms of offsetting also vary. The scheme could require more or less direct equivalence in type between the harm done and the beneficial measures taken, requiring like-for-like replacement, meaning that damage to a wetland would require the protection or creation of a similar wetland so that the same specific elements of biodiversity benefit. Alternatively, the scheme could allow for damage to one sort of habitat to be balanced by support for a quite different but equally (or more) valuable type of habitat. The greater the flexibility allowed, the greater may be the problems of determining whether a particular project is meeting the requirement of ensuring no net loss to, or a net gain for, biodiversity.

6. The beneficial work undertaken (directly by the developers or attributed to them as a result of their being allowed to buy the credit for work done by others) may be set off directly against the damage being caused by a particular operation, with each project being considered in isolation, or it may be possible to take a broader view. In particular, the idea of ‘habitat (or biodiversity) banking’ could be used, with providers creating a stock of actions with beneficial biodiversity outcomes, the credit for which developers can purchase to offset the debit from the environmental damage of their projects. By introducing a stronger market-based element, this approach offers more flexibility to developers and encourages those who have land of biodiversity value to view its maintenance and enhancement for this purpose as an asset which can be used to gain income from those in search of biodiversity credits to set off against their damaging activities elsewhere.

Economic Value of Ecosystem Services

7. Taking account of the economic value of ecosystem services and "natural capital" is desirable. At its simplest, ensuring that the value of services is reflected when decisions that affect the state of undeveloped land are being taken, so that the economic gain of development is not viewed in isolation from the economic loss if ecosystem services are no longer provided. Thus, for example, any environmental impact assessment at project or strategic level might attempt not merely to identify any adverse environmental consequences but also to put a value on any ecosystem services lost. Simply by adding a further element on the ‘environmental’ side of the scales, and one with a financial label attached, the decision-making process would undoubtedly be affected.

8. Linking the costs and benefits more directly is more challenging. One limited possibility is to restrict this approach to new activities, applying a form of the ‘polluter pays principle’ to recover sums from developers whose activities diminish the ecosystem services provided, for example by building on a flood plain and thus reducing its capacity to fulfil that function. Such a charge would operate like a version of the Community Infrastructure Levy. To implement this idea in relation to compensating for the diminution of ecosystem services, one might consider extending the scope of the activities triggering the levy beyond those requiring planning permission (for example including agricultural changes that currently fall outside the planning system), while the rules on how the levy can be applied would have to be phrased to ensure that the proceeds were used to maintain or enhance the capacity to provide such services from other land.
9. A more ambitious exercise is to endeavour to require those who currently benefit from ecosystems services to make a financial contribution to those whose land use and management activities are providing and maintaining the services and who bear a cost in doing so, whether the expense of active management or simply by foregoing the profit that might be made by putting the land to alternative use. Recovering this contribution could represent a huge source of income for any land being maintained in its natural state, making this a much more attractive form of land use and diminishing the economic, and at times social, pressure to convert the land to more ‘productive’ use.

10. There are several different approaches to capturing some contribution, from the straightforward, but unsubtle, approach of using the national revenue system to redistribute wealth to finding ways to identify the individual beneficiaries of services and the individual providers and require the former to pay a proportionate fee to the latter. This would be fiendishly complex, but some relationships might be straightforward enough for this to happen. For example, if upstream landowners maintain land in a way that absorbs potential floodwater, offering protection to those otherwise at risk downstream, then it might be possible through some intermediary (local authority, insurance company) to collect a contribution towards the service being provided

**General Issues**

11. Several of the proposals in the Paper could be (crudely) characterised as promoting a privatisation of biodiversity, with increased reliance not on regulatory controls imposed by official conservation bodies but on the cumulative effect of actions by a wide range of private sector actors with reduced public sector intervention. This raises a number of issues.

12. Firstly, there is a need to consider the coherence of the approach. Biodiversity conservation is distinctly different from many elements of environmental law because of the nature of what is to be conserved. Although for emissions controls there are often very localised impacts to be considered, in many cases what counts is the overall quality of a fairly large unit, such as a groundwater reservoir, river basin or the global atmosphere. This enables trade-offs to be accommodated within overall limits set at a broad level, allowing for less co-ordination at the detailed level. The same is not true for biodiversity. Not only must each species and habitat be considered individually, as opposed to the way in which greenhouse gases can be grouped together as the focus of control, but the measures needed are site specific and can only be effective if a whole network of sites is similarly protected. The most wonderful measures conserving a forest are of no benefit to migratory wading birds, and protecting the birds’ winter feeding grounds is of no benefit if their summer breeding habitat is destroyed or the places where they stop and feed on their migration routes are no longer able to support them. Moreover, if we are to help species cope with the challenge of rapid climate change, conservation efforts must be directed not just as those areas of value today but at those that will provide a home for species as their current habitat ceases to be suitable.
13. Conservation effort therefore cannot work as a collection of distinct and essentially fungible units, but must proceed in a coherent and co-ordinated manner. Structures will have to be found that enable a sufficient element of coordination to be present and this points, perhaps, to the new mechanisms being seen as additions to rather than replacements for the current regulatory approach.

14. Successful conservation of biodiversity requires the support not just of measures specifically directed at this goal but of many others that influence the way in which human activity affects the natural environment. The law and policy on land use, rural development, water abstraction and pollution and many other topics will affect what happens to the habitat on which biodiversity depends. As a simple example, the attractiveness of entering an offsetting scheme may be greatly affected by details of the tax regime – how are any payments to the landowner categorised and will the value of the land be affected for tax purposes? Similarly there are issues over how the rules on leases and agricultural holdings and subsidies will treat land set aside as offsets, and whether dedicating land to conservation purposes will be compatible with the obligations on trustees and company directors to use land they hold for the benefit of beneficiaries and share-holders – benefit traditionally conceived of primarily in financial terms.

15. A conservation policy based more strongly on "privatised" techniques might lack transparency. At present, the central role of the statutory conservation bodies means that although direct public participation may be limited, at least it is possible to find out what is being done. If more conservation activity transfers to the private sector through offsets or valuing ecosystem services, this concentration on a single focus, governed by statutory reporting rules, and if necessary the obligations on public access to environmental information, will be weakened unless measures are put in place to ensure publicity for the steps being taken.

16. Accountability is also affected. The conservation bodies can be criticised at present for the limited extent to which they are accountable for their decisions, but they must provide annual reports to Ministers and Parliament and can be given directions by Ministers who are in turn accountable to Parliament. Unless a regulator is to retain a strong grip to an extent that diminishes the flexibility that is a virtue of the scheme, who can be accountable for the overall impact of conservation offsets, or for the nature and quality of land devoted to offsetting schemes?

17. Linked to both of the above is the issue of participation. Biodiversity offsets open up to those on both the supply and demand sides of the equation the possibility to select for themselves the particular areas of land and sorts of habitats to be protected and recognition of ecosystem services may bring ideals of shared responsibility and stewardship into play, as opposed to conservation being a matter that is dealt with exclusively by the public authorities.

18. The present structures can be criticised for weakness in the participation of the public as stakeholders, but if new mechanisms are adopted, the role of the wider public might be even more marginalised. Although dependent on official approval in some form, biodiversity
offset schemes rely on the private decisions and negotiations of those providing or acquiring the offsets. The opportunities for standard approaches to public participation are reduced to the extent that the conservation effort relies less on the direct action or regulatory decisions of a public authority and more on the aggregation of many individual decisions in the private sector and of individual transactions between private parties themselves or between private parties and the regulatory bodies.

19. Finally, there is the issue of what a move to a privatised approach means in conceptual terms. At present, biodiversity is commonly viewed as part of our common heritage, to be nurtured for the benefit of everyone. If it becomes the subject of a far-reaching offsetting regime or linked to the value of ecosystem services, there is a danger that this view is altered. Instead of being ‘a common concern of humankind’, it becomes a commercial commodity. This may have benefits, since by giving economic value to elements of biodiversity, real incentives are created for their conservation. It may be viewed as simply reflecting the reality of the economic basis of how society operates today and as such opening the door to the creation of means by which biodiversity can be embraced and effectively nurtured within that society rather than neglected, since it stands outside, beyond the reach of the modern world’s institutions and mechanisms.

20. On the other hand, such a change may be viewed as a fundamental, conceptual mismatch, a 'category-mistake', that wrongly elevates economic efficiency and selfish short-term individual preferences reflected in material terms over the communal, long-term, aesthetic and spiritual values which are essential to holistic human development and the achievement of a sustainable future. As Sagoff has noted in a US context, ‘To notice that the Endangered Species Act is not cost-beneficial is to recognize the obvious. That is the point of the Act, and of much of our environmental legislation.’

21. This tension has already been noted in relation to water resources, which are sometimes viewed as a heritage and sometimes as an economic good, with arguments presented that failing to recognise the value of such resources has been a factor in their wasteful and environmentally damaging use. There may be no simple answer, but the conceptual issue must be appreciated.

Note: These comments draw heavily on my recently published article, "The Privatisation of Biodiversity? Possible New Approaches to Nature Conservation Law in the UK" (2011) 23 Journal of Environmental Law 203

21 September 2011
Written evidence submitted by The Peak District Green Lane Alliance (NEWP 41)

Introduction

1. We are an organisation called The Peak District Green Lane Alliance. This is an umbrella organisation seeking co-operation among national and local groups worried about the increasing effects of “off-roading” in the countryside, particularly within the Peak District. We believe these effects run counter to the general philosophy advanced by “The Natural Choice” and will thwart some of the specific outcomes sought by it. This is especially true with regard to the areas of “protecting and improving our natural environment” and “reconnecting people and nature.” We believe our comments are relevant to other national parks and the countryside generally.

The Phenomenon Of Off-Roading

2. By “off-roading” we mean the recreational use of 4x4 vehicles and motor cycle trail bikes on what may be termed “green lanes” ie lanes with unsealed surfaces. Under current legislation, this use is legal where these tracks are Byways Open to All Traffic (BOATs); may be legal where they are Unclassified County Roads (UCRs); but illegal, where the tracks are Restricted Byways, Bridleways or Footpaths.

3. Off-Roading seemed not to have been a problem until about 1994, when its practitioners were few. There was minimal conflict with other green lane users, and the countryside could recover from any rutting or erosion caused. However, increasing availability of suitable vehicles has led to this pastime becoming a serious problem on many iconic routes. Examples of such iconic routes in the Peak District are Long Causeway, Chapel Gate and the Roych. The damage to the latter is particularly to be regretted as it forms part of the Pennine Bridleway, which was developed with significant public funding.

4. The growth of user forums on off-roading websites has also led to the greater popularisation of challenging routes – even attracting users from overseas.

5. The off-roading fraternity is split predominantly between 4x4 drivers and motor cycle riders, with an increasing number of quad bike users. Within these classes there is an organised group of adherents and an increasing number of informal users. Members of the former generally try to remain within the law and act responsibly but have limited influence over their members and none over informal users.

6. Many off-roaders claim to love the countryside and want to experience it just like walkers, cyclists and horse riders. We regard this claim as somewhat disingenuous, as privately there is admitted to be an element of testing, both of vehicle robustness and driving/riding skill, over difficult terrain. This element is demonstrated most vividly on the illegal side of the spectrum where, particularly with trail bike users, there can be deliberate seeking out of extreme terrain (often “off-piste”) and treating green lanes
as race tracks, irrespective of width or gradient. This behaviour tends to discourage non-vehicular users who increasingly perceive their rights being overridden.

Ways In Which Off-Roading Militates Against Outcomes Sought by “The Natural Choice”

7. We have grouped our comments under two broad headings. References to paragraphs in “The Natural Choice” are given in square brackets [].

Protecting and Improving the Natural Environment

8. We agree with the concept of “natural capital” [1.18] and the need to maintain this in the same way as other capital assets. We feel off-roading degrades the environment both physically and through noise pollution and wastes what may be a diminishing natural resource (oil) needlessly. Because of the terrain vehicles have often to be driven in an inefficient manner.

9. Moreover, where public funds have been spent maintaining a surface appropriate to the nature of the way, it seems perverse to squander that investment through permitting unsustainable use.

10. Similarly, we feel the further extension of vehicle tracks in the countryside is the obverse of the concept of the “ecological network” [2.11/2.12] spreading from core areas through linear corridors to buffer zones around cities. Off-roading also causes damage to trackside vegetation. Such vegetation can aid biodiversity, since it is often less affected by agri-chemicals than surrounding land, and also form useful wildlife corridors.

11. Our experience suggests the local nature partnerships advocated in [2.15-2.23] would find it easier to garner support from the community if people felt their efforts were not in vain. We know of farmers and volunteer groups who would be willing to repair the damage done by off-roading if use then ceased but are naturally reluctant to waste time and resources if further damage is likely to occur. Offers of free repairs if traffic regulation orders were imposed on damaged lanes have been made at public meetings by farmers in the Brough and Shatton area of the Peak District.

12. We are sceptical about the likely success of any Localism Bill [2.25]. Whilst welcoming the opportunity for communities to have a greater say about environmental priorities, through having the power to call local referendums and draw up neighbourhood plans [4.22], we feel the essential conservatism of public bodies will defeat this. Giving local authorities “a general power of competence….. setting them free to innovate in response to local needs and environmental objectives” does not mean they will actually do this. Indeed our experience is that it is difficult, to get some local and national park authorities to fulfill their existing statutory duties to protect the environment and look after highways.
13. Similarly, we find it curious that Nature Improvement Areas are being proposed when it seems impossible to protect existing “crown jewels” such as the national parks.

Re-connecting People and Nature

14. The White Paper recognises the connection between young people and nature is weaker now than in the past and that this connection “enhances their education, personal and social skills, health and wellbeing and leads to the development of responsible citizens” [1.27]. We do not believe that the use of trail bikes on green lanes can be considered connecting with nature. We see some young trail bike users causing wanton destruction to the environment and to ancient monuments whilst terrorising and driving away walkers, cyclists and horse riders who are trying to connect with nature.

15. There is also a desire to get young people to re-connect through education – “schools should be able to teach outdoors when they wish to do so” [4.14]; “the pupil premium…could be used for funding school trips to experience the natural environment for pupils from deprived backgrounds” [4.15]. Our experience sadly is that even village schools, such as Great Longstone in the Peak District, with the countryside on their doorstep, are stopping nature projects on one local route because of the danger from off-roading. Children at Great Hucklow are in danger from off-roading even gaining access to their school.

16. The White Paper states that people can also connect with nature through the choices they make in their everyday lives [4.3]. Nature is said to be good for health [4.5], while access to attractive green space and footpaths encourages walking [1.27], lowers crime and encourage greater social activity [1.30]. We do not consider that access in this sense should be equated with vehicle access, which is what the off-roading lobby often claims. Riding about the countryside cocooned in a vehicle is not connecting with nature and neither is it the active recreation advocated in [4.9]. In the Peak District there is an extensive network of minor sealed routes which already caters for those wishing to see the countryside from a vehicle.

17. We acknowledge that some of the more responsible 4x4 users do take people with limited mobility out into the countryside using green lanes. We consider, however, that taking them on the minor road network mentioned above or to well surfaced, vehicular free routes, suitable for disabled users, would be a preferable option. An example of such a route is the Monsal Trail in the Peak District, which has recently received public money to provide wheelchair access and re-open old tunnels.

18. A desire to reduce noise and air pollution is expressed in [4.10/4.11]. We accept that vehicles cause only a part of this although the use of trail bikes in the countryside does produce an irritating whine over significant distances. It seems contradictory to promote urban quiet areas [4.31] whilst allowing the natural quiet of the countryside
to be increasingly disturbed by the growth of this hobby. Similarly, there seems to be a contradiction between seeking to reduce the use of cars to reach national parks, areas of outstanding natural beauty and national nature reserves [4.35] whilst not limiting the use of vehicles for recreational purposes within them.

Possible Ways To Mitigate These Effects

19. Our sister organisation, the Yorkshire Dales Green Lane Alliance has a slogan “Where the tarmac stops, vehicles should stop”. We feel this is a vivid expression of what would be a desirable general principle of legislation in this area – that with the exception of access to land and property by owners; and use by emergency services; vehicles should only be used on rights of way which have been specifically designed and constructed to accommodate their use. Ancient ways self-evidently do not fall into this category and there are numerous examples showing vehicular use is generally not sustainable. The destruction of the medieval “setts” paving the descent to the delightful packhorse bridge over the Dove at Washgate on the Derbyshire/Staffordhire border is a vivid example.

20. We consider the adoption of such a principle would have two favourable effects. Firstly, it would assist the change in public attitude to nature and the countryside which we feel the White Paper is promulgating. Secondly, it would greatly assist the enforcement of the law against the already illegal use of vehicles on footpaths, bridleways and restricted byways. Successful enforcement depends upon clarity and simplicity. We find the police and Crown Prosecution Service are reluctant to pursue offenders until the status of routes has been formally determined and relevant signage is in place. The latter is encouraging a minor industry based on removing signs as soon as they are put up and selling them for scrap.

21. Currently, rights of way legislation is based on historic usage, from times when modern forms of transport would have been inconceivable. Such usage has to be inferred from maps and documents which were developed for quite different purposes. Interpretation of the evidence can therefore be a matter of chance. The Natural Environment and Rural Communities Act 2006 was intended to move away from this situation, whilst protecting access to properties over minor roads. Unfortunately, unhappy draughting has led to numerous claims of general vehicular rights by means of these equivocal historical sources. Processing these claims overloads the legal departments of councils. Contesting decisions through public inquiries delays their resolution further and until the situation is resolved, preventing vehicular use is impossible, in practical terms, whatever the current status of the route.

22. If such an approach was considered too radical, we feel that there is scope to tighten up existing legislation. The decision in the Winchester case has helped greatly where the claimed routes were footpaths, bridleways and restricted byways but the problem of UCRs remains. We feel legislative changes could usefully be directed at this area and to the treatment of any BOATs which end in cul-de-sacs.
23. We are not experts in drafting such legislation but would be willing to talk further with DEFRA officials and parliamentary draughtsmen about the objectives to which such changes should be directed. Generally we feel the Highway Authority should have the option of making UCRs part of the normal road network, if they are sealed. Otherwise they should become Bridleways or Restricted Byways depending upon suitable criteria such as width, gradient and character.

24. We feel cul-de-sac BOATs should only be allowed where they lead to a tourist feature or viewpoint recognised by the local authority and where there is adequate parking and turning space.

25. Finally, we feel the police should have the power to prosecute mechanically propelled vehicle users driving on those unsealed routes, which are not defined as BOATs on the definitive map, regardless of the presence of signage. In other words the onus should be on the driver to check the status of a “non normal” route before driving on it.

22 September 2011
What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

1. Forestry is best placed to help deliver a transition to a low-carbon economy, while promoting the environment and helping people to reconnect with nature.

2. A greater use of wood is the easiest way for Government to achieve its greenhouse gas emission targets. Sustainably grown wood is an endlessly renewable and natural resource. It can be recycled into new timber products and at the end of its life burnt to produce renewable energy.

3. Producing timber requires significantly less energy than any other mainstream building material. For example, producing steel requires 24 times the energy needed to produce wood; while concrete can give off 140 kg CO2 per cubic metre produced. Moreover, as they grow, trees are producing the oxygen we breathe – almost three quarters of a tonne of oxygen for every cubic metre’s growth.

4. Simply by increasing the UK’s forest cover from 13 to 17 per cent we could, by 2050, abate up to 10 per cent of our national CO2 emissions, while producing further supplies of wood for low-carbon construction and renewable energy.

5. The UK wood industry has seen substantial growth over the last two decades, accompanied by a rapid expansion of domestic sawmilling and panel board manufacturing. More than £1.6 billion has been invested in the UK wood industry in the last 15 years and over the last two decades the numbers employed in forestry across the UK has risen from 34,000 to around 170,000. Confor estimates that the value of this growth has been to displace the equivalent of £1 billion of imports annually, with further growth available.

6. The emerging woodfuel market also offers considerable opportunities, if it develops locally and focuses on heat and combined heat and power. It has been estimated that the direct Gross Value Added contribution from woodfuel production will rise from £10.2m in 2010 to £40m by 2020. In addition, it is suggested that the number of direct employees in woodfuel production will increase from 256 full-time equivalents (FTEs) in 2010 to 782 FTEs in 2020. CEBR (2010)

7. Developing the market for wood, and planting new forests, will also benefit wildlife and people. Well managed woods and forests are home to an amazing range of flora and fauna, and provide valued places for recreation.
8. However, we are currently missing a massive opportunity. In England, there is a large area of unmanaged forest – almost 500,000 hectares, or around 45 per cent of the total forest area. These forests are not delivering their potential for nature and society. A study by government countryside agencies in 2005 identified a lack of management as detrimental to a wide range of flora and fauna, contributing to their decline.

9. Responsible management of forest costs money, and growth in the use of sustainably produced wood will channel much needed income to help support these forests achieve their potential.

**Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?**

10. Public policy has so far failed to grasp that the challenge in forestry is the opposite to that facing other sectors. Whereas government seeks to green the profitable business activity of a car manufacturer or a financial institution, in forestry the challenge is to make forestry financially sustainable and allow forests to deliver the societal benefits that they intrinsically provide.

11. Forestry struggles to make ends meet and government intervention often focuses on transforming a forest away from profitable activity towards non-profit making ‘public benefits’. For example, providing public access in a forest requires infrastructure and continued maintenance. Once the public subsidy has expired the provision is lost and the profitable timber activity may have disappeared meaning the forest falls into lack of management.

12. Forestry also lacks the levers that agriculture does. There is no CAP and available public funding is a drop in the ocean compared to what is required to deliver the ambition.

13. The priority for forestry must be to support financial sustainability and then build on top of that additional provision for wildlife and people – they will benefit anyway from the forest being responsibly managed.

14. This action requires building markets for wood, assisting forest owners to understand their resource and how it can be cared for as well as reducing bureaucracy and regulation that has a counter-productive impact. This will not be well delivered by NIAs and LNPs.

**What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?**

15. The Forestry Commission and its Research Agency has a key role to play here. While integration of forestry into surrounding land-uses is important, our forests need a
fundamentally new way of being aided by Government, working with the marketplace and private sector expertise.

16. It needs to be addressed from the opposite end of the telescope, as described above, to other sectors, and Confor is very concerned that this basic fact will be lost while focus on forestry is left to the Independent Panel on Forestry which will not report until spring 2012.

17. There is considerable interest, for example, in payment for ecosystem services, something the forestry sector here in the UK and abroad has been looking at for many years. Forests provide a huge variety of important benefits – timber, carbon, biodiversity, recreation, etc, but only timber (and to an extent sporting) brings in income. Government is keen to explore how these services can be valued and paid for. While there are individual examples of payments being made to forest owners, no clear opportunities have been identified for replicable funding streams or mechanisms that could have wide relevance.

18. There is a real danger that more public policy thinking time will be devoted to something that will not yield tangible benefit for forestry, and continue the inability to help the sector play its role in a green economy.

**What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?**

19. See previous point about failure of ecosystem services to deliver in the area of forestry and the danger that has for tackling current problems of lack of income in UK forestry.

**What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?**

20. See above. The resources required for forestry are difficult to measure, but are probably in the order of hundreds of millions of pounds. Government support for private forestry is about £26 million and ecosystem services are providing perhaps a few hundred thousand. Modest growth in wood prices would deliver millions of pounds. In doing so we could see tens of thousands of hectares of unmanaged forest brought into responsible management with considerable green jobs, carbon reduction and biodiversity benefits.

21. The establishment of a business-led ecosystems markets taskforce and the interest in exploring the expansion of the market for natural services is interesting on an academic level, and may bring some additional income to very individual forests. However, they will not make a fundamental difference.

**22 September 2011**
The Consumer Council for Water (CCWater) is the independent non-departmental public body representing the interests of water and sewerage customers across England and Wales. We have four local committees in England and a committee for Wales.

We have worked with the water industry and its regulators since 2005 to get the best results for consumers. In that time we have:

- **been central to achieving the customer focused outcome from the 2009 price review**, which was over **£1bn better for water customers** than the 2004 price review when CCWater did not exist;
- **convinced water companies to return over £135m to customers** through either additional investment or bill reductions;
- **dealt with over 90,000 complaints**;
- **returned over £12.4m to customers in compensation**; and
- **cost 21p per water bill per year**.

We welcome the opportunity to submit evidence to the Environment, Food and Rural Affairs Committee inquiry into the Natural Environment White Paper.

Our evidence is provided from the perspective of the water customer, both domestic and business. We have a broad database of existing reports and we conduct tracking research each year. This helps us to reflect the views of customers in decision making.
1 General comments

1.1 Broadly speaking, CCWater feels that 'The Natural Choice: securing the value of Nature' (the White Paper) is heading in the right direction.

1.2 We are encouraged by the commitments that will assist other sectors, such as agriculture, to increase their contribution to tackling the pollution for which they are responsible. These include the support for catchment level measures and the commitment to develop a strategy for tackling diffuse water pollution from non-agricultural sources.

1.3 In particular, we support the commitment to expand schemes where providers of nature’s services are paid by the beneficiaries. This should help to encourage the agriculture sector to focus on environmental stewardship.

1.4 For these schemes to operate effectively and provide legitimacy for interest groups there needs to be a robust, transparent framework, including clear objectives, in place. We therefore support the commitment to carry out a full review of the use of advice and incentives for farmers and land managers, with the aim of creating an improved approach with better outcomes.

1.5 We await any further details on abstraction reform and strengthening the sustainable drainage framework, which will be set out in the forthcoming Water White Paper.

1.6 We welcome the work to define the benefits that can be gained from ecosystem services, and optimise the best way of achieving these benefits. Benefits need to be monetised effectively and fed into robust cost-benefit analyses of investment decisions.

1.7 We welcome actions to strengthen the evidence available for decision making, such as the work on the Natural Ecosystem Assessment and planning for low-carbon infrastructure.

1.8 In addition, although these are not specific commitments, we strongly support the priorities for influencing the European Union (EU) set out in section 5.19. We agree that the overall aim should be to put the EU on a path towards environmentally sustainable, low-carbon, resource-efficient growth. The intention to press for a
climate change audit of existing EU policies and spending plans should contribute strongly towards this aim.

1.9 We also agree with the intention to press for new or revised legislation to be:
• evidence-based, science-based and flexible; and
• designed with regulatory and administrative burdens, and compliance costs weighed against the benefits.

1.10 In the future, we consider that the requirements set out in EU Directives should take account of the impact on customers’ bills of those requirements and the scale and pace needed to meet them.

1.11 CCWater has evidence and experience that may help Defra in engaging members of public with the issues raised in the White Paper.

2 Response to consultation questions

2.1 We have responded to the questions which have most direct impact on water customers.

2.2 Question: Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

Question: What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery.

2.2.1 We feel that the White Paper generally makes an accurate assessment of the barriers to public engagement. Public engagement will improve if consumers are involved with the decisions that affect them and, especially, if they are consulted over the scale, pace and cost of any changes. In this way, as we said in our response¹ to last year’s consultation², the White Paper objectives will be delivered successfully.

2.2.2 Consumers do value their environment. Defra’s 2009 research into consumers’ attitudes towards the environment\(^3\) indicated that over half (55%) of those consulted would like to do at least ‘a bit more’ to help the environment. Consumers were clear that they are willing to play their part by adapting their lifestyles if they are engaged in the right ways. This information is very similar to our own research on customer views on water and sewerage issues.

2.2.3 For example, CCWater’s ‘Using Water Wisely’ research into consumers’ attitudes\(^4\) to water use and water efficiency demonstrated that:
- most consumers are willing to get involved if others do too;
- they express a strong willingness to think about their own water use and ways of reducing wastage; and
- many already undertake activities that reduce the amount of water wasted.

2.2.4 The research supports Defra’s own, showing customers’ willingness to ‘do their bit’ and that different customer groups can be identified. Hence, water companies can help customers be more water efficient by tailoring their approach to different customer groups and providing clear and appropriate help and advice.

2.2.5 Our ‘Using Water Wisely’ research showed that the biggest barrier to customers engaging in individual issues is their perception that others are not doing enough in terms of their contribution. In water, one such example is leakage, which can be perceived by customers as companies not doing enough to keep their side of the bargain. This can be a barrier to customers doing more.

2.2.6 Further challenges to engagement arise because meeting environmental targets has already come at a significant cost. Since privatisation, water and sewerage bills have risen considerably and are now more than 45% higher in real terms\(^5\).

2.2.7 Customers’ views on satisfaction with the value for money of the services they receive provide a useful insight in to the tensions that may arise should levels of environmental investment increase further. CCWater’s research indicated that, even

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though water and sewerage services cost on average £1 a day, customers’ satisfaction
with value for money is, at around 70%, only roughly on par with that of
significantly more expensive energy services. As a result, customers have only
limited acceptance of future price increases to fund further investment in
maintaining and improving the environment.

2.2.8 Our experience in the last price review\(^6\) has shown that where companies are more
successful in communicating with their customers in a way that they relate to, about
what they are doing and why, their investments have been more acceptable and are,
therefore, more likely to continue to be acceptable in the future.

2.2.9 Our latest tracking survey\(^7\) provided evidence that this approach works. Water
companies with a higher level of communications, such as Yorkshire Water and
Northumbrian Water have a better satisfaction with value for money.

2.2.10 If price increases constantly exceed the levels identified by customers, the industry,
its regulation and its funding system will lose legitimacy. This could put a significant
brake on willingness to pay and the outcomes of future price reviews.

2.2.11 Ultimately, consumers will be more willing to pay for environmental changes if they
accept why they are necessary and understand what the outcomes and impacts of
any changes will be. For this reason it is vital that any new investment is subject to
robust cost benefit analysis to ensure that it represents value for money.

2.2.12 Further research will undoubtedly be needed in the future. Willingness to pay or
views on satisfaction with value for money should be monitored closely to inform
the scale and pace of new investment or obligations.

2.2.13 In addition, CCWater considers that one of the priorities is to develop a
methodology that ensures the quality of cost benefit analyses. To this effect, we
welcome the UK Water Industry Research (UKWIR) project to identify best practice
in cost benefit analysis and urge that Defra consider fully the recommendations and
follow-up work.

2.3 Question: What actions are required across Government Departments, from


\(^7\) DJS Research (2011) - Annual Tracking Survey 2010-11 report for CCWater
http://www.ccwater.org.uk/upload/pdf/CCWater_Annual_Tracking_Survey_2010_FINAL.pdf
local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

2.3.1 CCWater’s ‘Using Water Wisely’ research, as referred to in section 2.2, may have parallels in other areas of the public’s perception of the environment and, hence, in their willingness to engage with the environment. For example, this research showed that there is a need for consistent, independent and trustworthy communications from a number of organisations on key issues. Customers view messages from bodies like water companies as being partial and will, therefore, treat them with caution. However, customers will value these messages more if are backed up by messages from independent, authoritative bodies they can trust, such as CCWater.

2.3.3 We know that a joint approach works. As a result of initiatives by CCWater, water companies, water regulators and governments, our tracking research indicates that the percentage of customers who are saving water has increased by 4 percentage points over the last three years. Over 75% of people now say that they have taken action to reduce water usage and this is an improving trend. It is encouraging that water customers are showing more willingness to do their bit in spite of any barriers.

2.3.4 Similarly, our research into flushable products helped us to develop several public information campaigns, alongside water companies, that have encouraged water customers to change waste disposal habits. Over the last three years, awareness of this issue has increased by 11 percentage points to 80%, helping to reduce the risk of sewer flooding.

2.3.5 We believe that our approach, backed by good customer research and partnering with other bodies, works well in terms of getting the public engaged and changing their behaviour. This could be replicated in other sectors beyond the water industry.

Common Agricultural Policy

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8 This is a comparison of this year’s figures with the figures from the 2008/9 tracking research:
DJS Research (2011) - Annual Tracking Survey 2010-11 report for CCWater
http://www.ccwater.org.uk/upload/pdf/CCWater_Annual_Tracking_Survey_2010_FINAL.pdf
In addition to these points, CCWater also considers that the reform of the Common Agricultural Policy (CAP) presents some useful opportunities to protect and enhance the natural environment. To contribute towards growing a green economy, the UK Government could support the following principles during discussions at EU level:

- Current levels of support for agri-environment schemes to be continued, if not increased; and
- Any revisions of the CAP should incorporate incentives to tackle pollution at source and avoid water wastage.

23 September 2011
Written evidence submitted by GreenLINK (NEWP 44)

GreenLINK brings together, at a national level, organisations that are active in the parks and green space sector. Participating organisations include charities and trusts, social enterprises and other non-governmental bodies. GreenLINK provides an open forum where knowledge can be shared, duplication can be avoided and robust and effective responses to challenges that impact on the sector can be jointly developed. Government Agencies and non-departmental public bodies are welcome and regular observers, expanding access to information and resources and making useful connections across different government departments, agendas and initiatives.

GreenLINK is hosted by GreenSpace the national charity working to improve parks and green spaces by raising awareness, involving communities and creating skilled professionals.

1. What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

1.1 The Natural Environment White Paper (NEWP) was the most significant piece of environmental legislation for two decades. In producing this document the Government has clearly laid out the importance of ecosystems, landscapes, natural sites, parks and green infrastructure in having numerous benefits for the UK; socially, environmentally and economically. The transition to a prosperous, green economy needs to fully encompass both the environmental stewardship required in the face of a changing climate and the ambitions to create a stronger, civil society able and engaged to improve their communities. By overlapping these three potentially conflicting ideals the Government is challenging itself, local authorities, business, GreenLINK and all other organisations and citizens of the UK to reach an equitable outcome. The task is immense.

1.2 Aspects of Government need to be aligned, policies, political ambitions and long-term planning, in order to achieve the goals of the NEWP. Currently, there are conflicting messages around economic growth and infrastructure planning and the balance with environmental and social gains. The proposed High-Speed 2 rail line or the
expansion of regional airports do not yet fully take into account the impact on ecosystem services, a theme so important in the NEWP. The draft Planning Policy Framework provides an inadequate and vague definition of ‘sustainable’ development with insufficient regard for environmental stewardship and green infrastructure. The apparent disconnection between two Government department’s strategic policies and priorities must be addressed in order for Government to lead by example, bringing businesses and citizens with them.

1.3 How the Natural Capital Committee will integrate with economic policy, within the treasury and beyond to business, is unclear; the inclusion of natural capital in UK environmental accounts is a positive demonstrative step, but the NEWP does not detail how this activity will translate into decision-making by business and government. Reporting to the Natural Capital Committee may require new data collection and reporting systems; again it is not clear who will lead and fund the development of new systems to ensure consistency in data collection.

1.4 Local authorities will continue to need financial support, ideally protected budgets, for them to manage and enhance landscapes and ecosystem services. Parks and countryside services already maintain a rich variety of partnerships with third-sector and community organisations, delivering projects which enhance urban and rural environments. The sector is already a vanguard of engaging with communities, motivating volunteers and partnership working to deliver wider benefits. In the past this commitment to involving communities in the management of green spaces has had the added benefit of compensating for declining budgets and resources. At a time when there is increased impetus to further expand this area of activity, the relentless and disproportionate cuts to local authority green space budgets are endangering the sector’s ability to sustain current levels of community engagement. Jobs, skills and experience are leaching from the sector. Increasing volunteering opportunities and engagement with the wider community remains a goal, but to fully deliver the enhancement and protection
the landscape requires, they will also need professional and skilled management, knowledge and support to shape their efforts.

2. Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

2.1 Nature Improvement Areas (NIAs) and Local Nature Partnerships (LNPs) are the Government’s proposed delivery model for the NEWP. The wording around this section is passive and does not reflect the clear ambition of the rest of the NEWP to ensure that natural capital, or the value of ecosystem services, is properly accounted. NIAs and LNPs need to be properly enabled across the UK and their functions monitored and evaluated. The Government proposes to ‘encourage’ LNPs and Local Economic Partnerships (LEPs) and Health and Well-Being Boards to work together, but this must be effectively enabled as these organisations may well have conflicting aims and alignment on all sides may be potentially difficult. At present LNPs are not even guaranteed a seat at the table; their representation is left to the discretion of LEPs and Health and Well Being Boards. In the current Local Government Planning Regulations consultation LEPs appear as statutory consultees but LNPs do not; this needs to be aligned. Furthermore, LEPs also have a far stronger sustainability model with businesses ready to work together, whilst bringing easy access to crucial private sector funding, to deliver projects. As yet the seed-funding can only initiate the development of NIAs and LNPs with further funding to be sought by each group, potentially from grants but, ideally in the eyes of Government, from private sector business. The case must be delivered by Government that the funding is as vital as all other growth strategies; functioning and enhanced ecosystem services must be of equal priority to ensure the future security of the UK.

3. What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?
3.1 Government should work on a range of pilot projects, as currently being undertaken in part through Defra, to assess the range of ecosystem services in the variety of landscapes and green infrastructure throughout the UK. Standard, international units of ecosystem services are seemingly a way-off delivery, but when such mechanisms are developed for assessment then wider audience participation will be easier to create. Until such time, the Government needs to maintain clear messages about the importance of the natural environment and landscapes, both urban and rural, that business and citizens can understand.

4. **What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?**

4.1 Significant international research is focussed on assessing ecosystem services values and the options for paying as highlighted within the NEWP. The complexities of biodiversity, regional and global climatic variations and the interconnected relationships between biosphere functions demands that research here should retain a UK focus. Methodologies developed in the US and applied in Philadelphia and Denver need to be adapted and applied at a city wide level here in the UK. The learning from international projects is constantly absorbed through research professionals in the UK, and the learning disseminated and applied as we understand more. The Government has the opportunity to lead international learning by encouraging greater research and case study projects in the UK. This should be at all scales and levels; from consortia of NGO’s, major companies and managing authorities looking at wide-scale landscape restoration to local authorities, community groups and local environmental charities working to understand the benefits of local green spaces. By combining learning and delivery, enhancement can be achieved faster and greater numbers of people can be inspired.

5. **What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems
to beneficiaries be translated into spending that will enhance the natural environment?

5.1 GreenLINK understands that the Government needs to reduce its spending deficit and accordingly, all sectors must accept their share of budget restrictions. However, the environment is critical in maintaining quality of life and the UK’s future security. As our climate changes, locally and globally, the UK environment will be under increasing pressure and the ecosystem services provided to all of us equally impacted. This is before the need for development to serve a growing population and expanding urban areas, with all their associated resource consumption, further increasing the burden on the natural environment. If the Government wishes to achieve a growing economy in the future it must achieve this within environmental limits. Of the three overlapping ideals of economic growth, social unity and environmental quality, it is the functioning environment that always underpins the other principles.

5.2 Landscape-scale protections and management, through NIAs or other designations, need to be funded primarily through protected unitary or local authority budgets. This will continue to enable existing partnerships and community organisations to maintain and improve their local green spaces and natural areas. There is growing evidence that investment in green and blue infrastructure returns a ratio of benefits between three and twenty times the capital cost when assessed across economic, social and environmental indicators.

5.3 There are also great opportunities to retrofit and technically improve urban areas with economic benefits of; improved population health and well-being, better quality commercial environments, research and development of knowledge and new technologies for UK and international export and business opportunities in an emerging environmentally sustainable sector. As this ‘green’ economy grows steadily the savings delivered through resource efficiency can be diverted to further protect and improve the wider landscape.
6. Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

5.4 Barriers to engagement with the natural environment are varied and in many cases are the combinations of causes. The quality of the local environment plays an important part in how people use their streets and public spaces, interact with neighbours and feel in themselves, physically and mentally. In areas of social deprivation communities often have a myriad of challenges, cultural distinctions and limited opportunities that affect their lifestyle. Grassroots projects often have great impact with small interventions, measurably enhancing local cultural ecosystem services even within low quality, amenity green infrastructure. Professional support through unitary and local authority, town and parish councils and third-sector environmental organisations will still be needed, to provide those with greatest need with the tools and confidence in which to start changing and improving their environments. Environmental projects, whether community gardening, wildlife and habitat enhancements, park improvements or street awards, act as platforms for wider messages around sustainable lifestyle choices and active citizenship.

5.5 Accessibility to natural spaces can be as acutely problematic in rural as in urban areas. By making more natural spaces accessible to the public greater numbers of visits can be encouraged, with the associated health and well-being benefits. Many people cite poor health, old age or disabilities as barriers to them visiting the natural environment. Here again, small interventions to provide networks of adequate, safe paths with resting places for users of all abilities, can make important differences. Even those with busy lifestyles, who rarely have time to use their local green spaces, will indirectly benefit from a greening of the environment when they travel outside their home, with better air quality and improved stress levels. The Government understands these benefits for individuals and communities and then society and the economy. The publication of
NEWP shows clear ambition from the Government to improve the quality and accessibility of the natural environment.

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KEY MESSAGES FOR NEWP:

- **Need for greater evidence** – to ensure mapping and profiling of wildfire risk across government, landowners, and local communities. Wildfires incidents and their impact are significantly under reported.
- **Landscape scale working poses opportunities and threats** – to building wildfire resilience in forestry system such as woodlands and open habitats.
- **Increased wildfire from present and future restoration and re-creation of open habitats** – due to a poor understanding of wildfire in both lowland and upland areas and principled ecological approaches to its management.
- **Embedding adaptation into priority species and habitats is critical** – and long-term may be more important than protection, conservation and enhancement.
- **Ensure dynamic and flexible approaches within policy** – even if this challenges present interpretations of UK legislation and EU directives.
- **Building resilience to wildfire** – using more resistant species, design planning and appropriate management practices at site and landscape levels.
- **A risk-based approach to the natural incidents** – will ensure an appropriate response, with a focus on preparedness and prevention to reduce the need and impact on response and recovery.
- **Long term wildfire resilience** – by the creation of forestry markets, as part of a green economy and employment, can help reduce vegetation fuels as well as reducing the impact on the taxpayers, especially on open habitats.
- **Linking together of development planning and land management policy** – providing strategic connections to ensure synergies are realised and hazards are reduce to an appropriate level.
- **Focus on vegetation fuel loadings** – in short-term government funding (i.e. HLS) and long-term biofuel and timber markets.

Background

1. The England and Wales Wildfire Group is made up from the fire and land management sector organisation, covering both public and private organisations. It works with numerous wildfire groups in areas of high wildfire risk.

2. The South East England Wildfire Group represents eleven Fire and Rescue Services and as well as Defra agencies. Its three-landscape scale Fire Operation Groups (FOG) brings together a wider range of both public, private and NGO landowners.
3. Wildfires are vegetation fires that are out of control and affect a range of land uses including forestry, heath and moorlands, agriculture and grasslands across the United Kingdom. Wildfire incidents are natural hazards that require the alignment of numerous factors in order to occur. The majority of wildfires are started by humans and occur due to climate and weather, but the management of its fuel, vegetation, is within our control. The latter’s destiny is in part shaped by government policy.

4. A unique opportunity now exists to rectify this and increase our resilience using the recently published Natural Environment White Paper (NEWP) and draft National Planning Policy Framework (NPPF). For this reason we have chosen to highlight the links and synergies between these two processes to ensure an integrated national approach.

5. In both the NEWP and NPPF are weaknesses and opportunities to increase wildfire resilience and wider natural hazards.

What actions are required across Government Departments, from local government and by civil society to deliver the White Papers proposals to grow a green economy and reconnect people with nature?

Too limited focus on natural hazards
6. Wildfire needs to be recognised in the NEWP, along with other natural hazards by government departments, local government and other bodies. Although the NPPF does accept the need to consider planning for adaptation to climate change and promotion of green infrastructure\(^1\), both it and the NEWP restricts their focus on natural hazards to solely on flooding.

7. It is important to note the more holistic approach undertaken by the Cabinet Office’s consultation on natural hazards and national infrastructure\(^2\), especially on wildfire. Ideally any approach should be a risked-based and linked to other sectors such as fire\(^3\). In terms of planning this could be practically achieved by evolving the present toolkit to flooding\(^4\) for wildfire, whereby specifying risk areas to both development planning and land management.

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\(^1\) P 43 ‘Minimise vulnerability to climate change and manage the risk of flooding’

\(^2\) Keeping the Country Running: Natural Hazard and Infrastructure


\(^4\) ‘Planning Policy Statement 25: Development and Flood Management’
**Threat to renewable energy**

8. Responses by both fire and forestry sectors to previous government consultations have highlighted Read Reports\(^5\) need for enhanced rural resilience to natural hazards. Without this local renewables and low carbon energy supplies will not be protected. This includes sustainable natural materials and renewable energy systems as well as the infrastructure and utilities used to process and transport them. As the majority of the raw material and infrastructure are to be found in rural locations, they are vulnerable to present or future natural hazards.

**Embracing adaptation**

9. It is critical to help reduce the impacts of wildfire that the NEWP strongly promotes a more adaptive future towards species and landscape, as well as habitats. This is partly accepted in NEWP but the focus towards environmental and nature protection is both static and inflexible. The need, to accept change and adaptation, is supported by both the Read Report\(^6\) and Natural England\(^7\). Importantly it accepts that at the composition of habitats will change, so ‘adapting’ in high-risk areas is vital.

10. A pragmatic and dynamic approach to habitats, species, heritage and landscapes in NPPF and NEWP landscape scale delivery is now required, future proofing climate-related risks and providing long-term vision, ideal for the land management sector. Stronger consideration should be made to promoting adaptation in NPPF and NEWP. Only where it is appropriate should preservation, restoration and re-creation priority habitats be undertaken. This should be a national priority, as well as helping the transition of priority species as they move in and out of climatic range.

**Impact of SR10 on government departments and local government**

11. The present SR10 savings are having a significant impact on wildfire resilience capacity of government departments and local government. Historically National Parks, Forestry Commission, Ministry of Defence’s Defence Estates Foresters and Local Authority Fire and Rescue Services, due to their long-term vision and staffing, played a vital role in building wildfire preparedness and prevention across other government departments and private landowners. Their leadership has been vital in improving the efficiency and effective of wildfire response. The impact of staff reductions risk decreasing national and local wildfire resilience.

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\(^5\) Combating Climate Change – a role for UK forests: Main Report. An Assessment of the Potential of the UK Trees and Woodlands to Mitigate and Adapt to Climate Change (2009).

\(^6\) Accepting that new cultural landscapes will develop in response to the new climate conditions.

\(^7\) Climate Change Policy, NE97 Natural England, 2008.
What resources will be needed to fully deliver the White Papers’s ambitions and how can these best be provided? Might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

Knowledge gaps
12. The FIRES seminars⁸ identified a knowledge gap that appropriate costing tools for ecosystem services especially for non-use regulating and cultural ecosystem services. Using these tools, the indirect costs of a vegetation fire on ecosystem services could be calculated relative to the direct cost of fire-fighting and active fire prevention.

Policy recommendations
13. The FIRES seminars also made the recommendation that economic and social value of all ecosystems should be recognised in relation to wildfires. This includes the calculation of ‘avoided costs’ of damage to ecosystem services to be set against direct costs of wildfire prevention and suppression.

Building resilience to Ecosystem Services
14. In the long-term open habitats, such as upland and lowland heath and moorland, are expected to pose a significantly increased wildfire risk as defined by the UK National Ecosystem Services Assessment⁹ (2011) and workshops to develop the Climate Change Risk Assessment (2010)¹⁰.

15. Therefore an increase by so called ‘restoration’ and the re-creation of open habitats will pose serious concerns to future UK resilience. At present this weakness is only being addressed in forest policy by a risk-based approach in the Forestry Commission’s Open Habitat Policy in partnership with Fire and Rescue Services and England and Wales Wildfire Forum.

Market based solutions to reduce fuel loading
16. Critically both the NPPF and NEWP should support and encourage active and sustainable land management and limit the use of non-intervention. For wildfire in the NEWP this should focus on managing vegetation fuel loading. The NPPF could do this by promoting biofuel heating in new development, creating markets for wood residues, chip, pellets and heathland arising. The resulting increase in management would lower fuel loadings at no cost to the taxpayer, move land

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⁸ Fire Interdisciplinary Research on Ecosystem Services (FIRES): Fire and Climate Change in UK Moorlands and Heaths: Knowledge Gaps
⁹ Chapter 5: Mountains, Moorlands and Heaths 5.3.2.3 Natural Hazard regulation: wildfire risk
¹⁰ CCRA Biodiversity Sector Workshop Record (CEOSA 0901) and Appendix
managers away from publicly funded land management grants and building long term resilience.

**Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Nature Capital Committee have sufficient powers?**

**Framework and delivery mechanisms**

17. At present there is no detail from Defra in how NEWP’s Local Nature and Green Infrastructure Partnerships (LNP and GIP), as well as their delivery mechanisms, such as Nature Improvement Areas (NIA) and Green Areas, will help build resilience to wildfire incidents and other natural hazards. There is concern that a further layer of designations will increase bureaucracy and red tape.

18. In England, as in the rest of the United Kingdom, the greatest challenge may be embedding greater resilience in both development planning and land management regulators. This is especially the case if they are subject to a more principled view of ecology and/or are vulnerable or sympathetic to single interest lobbying.

19. At present Entry and Higher-Level Stewardship payments for management on high risk lowland heath, especially for grazing, does not provide sufficient safe guards or control measures to build resilience to wildfire incidents.

**Landscape scale working**

20. As wildfire has no respect of land ownership, the most significant opportunity to address wildfire is at a landscape scale, rather than just within individual sites. This is highly desirable as the risk posed by one land holding may significantly reduce the resilience of another.

21. But wildfire can also take advantage of this as well, with an interconnected landscape of vulnerable habitats increasing in size, scope and impact of incidents. As the landscape approach to management unfolds in response to the NEWP and NPPF, it is important to ensure that appropriate knowledge of wildfire risks is embedded into guidance as well as being suitable financed.

22. This may or may not fit with evolving NIA and LNP areas, overlap or create gaps with other nature conservation, heritage and landscape (UK and EU) designations, so presently their need is questionable from a strategic and operational point of view. We suggest that all designations are reviewed and rationalised first with a framework created before NIA and LNP are implemented.
What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

23. The FIRES seminars have identified the following knowledge gaps:
   • A comprehensive, accurate, spatially robust and accessible evidence base on UK wildfires.
   • Acceptable multi-disciplinary criteria for assessing and measuring fire severity.
   • Change regional fire regimes.
   • Appropriate fire regimes.
   • Synergy and conflict between policies.
   • Appropriate costings tools for ecosystem services
   • Stakeholders attitudes to wildfire
   • Improved technical tools for UK conditions: species, habitats, management practices etc.
   • Knowledge exchange and research partnerships with fire managers

Further details on the above can be found in the FIRES seminars Policy Brief\(^1\).

What evidence is there from other countries that the approaches proposed in the White Paper can be successful applied in practice?

Looking to the future – international good practice
24. As you may expect none of what is suggested above is new. The use of integrated planning policy and land management to reduce wildfire is a common in North America and the Commonwealth of Australia. In Victoria\(^{12}\) and Tasmania\(^{13}\) use a partnership approach across the planning control/development\(^{14}\), Fire and Rescue Services and Land Management. This effectively embeds integrated approaches into land use planning, habitat management and building regulations, whilst building considerable resilience to all but the most extreme incidents.

\(^{11}\) www.fires-seminars.org.uk/downloads/FIRES_policy%20Brief_final.pdf
What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

25. With reference to wildfires the answer across England is dependent upon habitats, landowners, changing climate etc and therefore varies. To build wildfire resilience within the NEWP only a modest, but long-term investment is required.

26. Defra and government should look to invest first in existing government departments and local government frameworks, current partnership (England and Wales Wildfire Forum and local Wildfire Groups) and research networks (e.g. Forest Research, NERC/ESRC), before creating further bureaucracy in developing and funding LNP and GIP. This will ensure that decision making and spending on ecosystem services is set against national priorities and is cost effective.

Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

27. We believe the SR10 saving, and its impacts on government departments and local government, must be considered as a barrier to public engagement with the natural environment.

28. Additionally wildfire must be included in the scope of the NEWP to ensure that the management of vegetation fuel is fully considered.

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Q1 Actions across departments: While the broadening of community engagement and the phoenix of QANGOs proposed in the White Paper may provide the connectivity necessary to bring its ambitions to fruition we are of the view that stronger links between aspirational policy and case by case decision-making may be required.

Our point is that while well intentioned, purposeful and responsible in reflecting both the instrumental and intrinsic value of the natural environment, the paper does not seriously get to grips with the issues of contested classifications and strategies for land use. For instance part 1.16 deals in a cursory way with demographic change yet we would see this as being one of the likely key drivers of conflict over the reassignment of land for social purposes e.g. building homes and commercial developments versus conservation zones. This is brought sharply into focus by the limited functional cross referencing or cross information between this document and the Draft Planning Policy Framework recently issued for consultation by the Department for Communities and Local Government. While both aspire to the principle of localism and fly the banner of sustainability, indeed the latter carries a “presumption” of sustainability¹, from which we assume that the expectation is that conflicts will be resolved and strategies and policies developed, by local and locally informed evaluative discourse. Yet quite apart from the differing interpretations of sustainability assumed among economic/development, social and environmental interests (characterised broadly by LEPs and LNPs in the white paper) there are likely to be very different understandings of the natures of different categories of ecosystem services and how these are valued. A case in point requiring strong policy guidance might be where resolution of the conflicting interests is achieved via compensatory biodiversity offsets. We appreciate that the White Paper, consistent with the recommendations of the Parliamentary Office of Science and Technology on Evidence-Based Conservation, gives undertakings to support research to identify bio-markers and biodiversity indicators and it may well be that expert evaluations based on these will support negotiation of the calculus of offset proposals. But at the same time we have some concern that some cross-departmental work will be needed to establish consensus and shared understanding of the utility and reliability as well as the weighting given to such indicators.

Thinking further about the resolution of conflicting strategies for land use, as students of the current trend towards green energy and renewable feed-stocks we are motivated to ask: how will the planning/zoning process cope when the assignment of marginal land to the production of bio-energy and bio-fuels is thrown into the equation?

¹ Insufficient it seems, to convince the National Trust of the framework’s beneficence
In this context it is becoming increasingly important both to have criteria for the categorisation of different types of marginal land, i.e. land which does not fall directly into the categories used by the NEA, and to have policy for their conservation or deployment, and we would submit that biomarkers and the shared understandings surrounding them, discussed above, have a role to play in this.

26 September 2011
RenewableUK is the trade and professional body for the UK wind and marine renewables industries. Formed in 1978, and with over 670 corporate members, RenewableUK is the leading renewable energy trade association in the UK. Wind has been the world’s fastest growing renewable energy source for the last seven years, and this trend is expected to continue with falling costs of wind energy and the urgent international need to tackle CO₂ emissions to prevent climate change.

I. Introduction and Summary

1.1 RenewableUK welcomes the EFRA Committee’s Inquiry into the Natural Environment White Paper (NEWP). While we welcome the principles and objectives of NEWP, and the use of biodiversity offsets, we highlight the need for proper coordination of strategic Government objectives across departments. The NEWP must not frustrate economic recovery and carbon reduction initiatives, and any resulting action or policy must not act as an additional barrier to the deployment of renewable energy, which facilitates environmental protection and sustainability – now and in the future.

1.2 There is also a need for a procedural framework supporting NIAs, LNPs, and LGSs to be subject to public consultation and wide engagement process - not simply developed by the departments or those specifically nominated by them. The creation, management, and upkeep of NIAs and LGSs should be done in an inclusive way and open to all stakeholders, including those from the business community. The planning status of LGSs and the different parts of NIAs also needs to be clarified.

II. Context – The Role of Renewables

2.1 Renewable energy plays a very important role in contributing to sustainable development, in reducing the country’s carbon emissions, reducing reliance on environmentally damaging fossil fuels and in mitigating the impacts of climate change, all of which will also help achieve the aims of the NEWP. It helps protect the
environment for future generations, makes the economy more environmentally sustainable and improve the quality of life and well-being of communities.

2.3 RenewableUK believes that the UK’s renewable energy targets will be best met through a diverse mix of sources. Failure to deliver the renewable energy investment needed could leave the UK exposed to infrarction proceedings from the European Commission and therefore all areas of England will need to significantly increase their levels of renewable energy generation. This will require positive planning and therefore a strong policy support.

III. Responses to the Committee’s Questions

3.1 Question 1: What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

3.1.1 It is vital that any Government strategy for the conservation of biodiversity and the environmental adaptation to climate change is conducted in harmony with the Government’s objectives for the decarbonisation of the UK’s energy network and the wider role of sustainable development in mitigating as well as adapting to future climate change. The proposals set out in the White Paper must correspond with and not frustrate the deployment of the clean and green energy infrastructure that the country needs in order to achieve substantial reductions in green-house gas emissions, stabilise energy costs and sustain economic prosperity while securing the long term future of the country’s ecological diversity.

Nature Improvement Areas

3.1.2 RenewableUK has concerns with the function of NIAs, the method in which they may be identified, and their planning status - at the local and strategic level. These should
be clarified by Government with more policy detail. Without clear focus on a limited number of key priorities for restoration within each NIA, there is a real risk that this initiative may lose focus and become dissipated.

3.1.3 RenewableUK recommends that proposed timescales be published for the election of an assessment panel and engage in stakeholder discussion workshops to inform the development of the criteria against which competitive bids are to be assessed. To ensure that the identification and subsequent location of NIAs are both widely understood and supported, it will be important to bring together a wide range of stakeholders in their development and in securing their continued success.

3.1.4 It is understood that 12 NIAs, covering at least 10,000 ha are to be established by 2015. However, the proposed configuration of land within NIAs, with core areas, corridors and stepping stones, is not yet clear. RenewableUK seeks further clarification as to the way in which the Department has envisaged these areas to work together, and the extent to which these areas are likely to map onto existing areas of environmental conservation.

3.1.5 The NEWP states that local authorities, communities and businesses will be able to use local planning to support NIAs through identification in local plans where they choose. However, there is no clarity as to the relationship between NIAs and the planning system, including, for example, whether NIAs may be identified as part of the plan-making process, at what stage NIAs may be included within local plans, and the status to be accorded to NIAs within the planning system. More detail is needed in policy, and we remain concerned that any uncertainty as to the role and status of NIAs, or their component parts, within the planning system will thwart investment in sustainable infrastructure and frustrate the economic recovery.
Local Nature Partnerships

3.1.6 RenewableUK welcomes the establishment of Local Nature Partnerships. However, in order for relationships between LNPs and LEPs to flourish, there will be a need for mutual cooperation and coordination of objectives. Without a clear priorities and objectives, there is a real risk that siloed thinking may result in conflicting initiatives, confrontational relationships and confused results. In order for economic investment to prosper it will be necessary for the objectives and relationships between these groups to be easily understood and informed by the business community as well as by local residents and interest groups. It is also important that their duties and make up are clearly laid out, to ensure that they are acting transparently and representatively.

New Local Green Spaces Designation

3.1.7 RenewableUK understands that the Local Green Spaces Designation (LGS), as identified within the NPPF is designed to give local people an opportunity to protect green spaces that have significant importance to their local communities. While we appreciate the need to prevent overdevelopment of areas we suggest that the aims behind this proposal may be better met through existing initiatives.

3.1.8 The purpose of such a designation was initially envisaged as being analogous to Sites of Special Scientific Interest (SSSIs); designed to protect and conserve species, habitats and geological features that meet specific criteria, based on their scientific importance. In contrast, the proposed criteria for the selection (and therefore function) of LGSs, as set out within the draft NPPF appear to protect sites that are ‘demonstrably special to a local community’ for any, or all of the following reasons: beauty; historic importance; recreational value; tranquillity; richness of its wildlife.

3.1.9 It is clear that the above summary of proposed criteria for designation differ significantly from that of SSSIs. The proposed function of the LGS appears to act
rather as a ‘catch-all’ for a range of amenity, ecological, landscape and historic factors. In RenewableUK's view the various intended objectives of the LGS would be better met through existing area-based classifications, e.g. Sites of Special Scientific Interest; Sites of Importance for Nature Conservation; Areas of Outstanding Natural Beauty; National Parks; Village Greens; Green Belt; Special Areas of Conservation; Special Protection Areas; National Nature Reserves; and Local Nature Reserves.

3.1.10 RenewableUK believes that the creation of a new designation will add confusion for all parties, both creating additional workload within LAs, who will be confirming these new designations; and raising extensive concerns amongst the developer community across all sectors, at a time when the Government is seeking to shore-up business confidence and stimulate an economic recovery. We recommend that the Government re-consider whether there is a need for this designation.

3.1.11 RenewableUK also has concerns that the creation of new areas identified as LGS, as currently defined, will further prevent the development of renewable energy infrastructure in otherwise acceptable locations. We therefore fundamentally object to draft proposals for local policies for managing development within LGSs to be consistent with those established under Green Belt legislation. Instead, we urge clear guidance on what development is appropriate within LGSs and exactly what their status is.

3.1.12 Following the publication of the draft NPPF, we understand that consultation on this designation is currently taking place within the wider consultation on the NPPF and not through separate publication. With such a potentially new important designation, RenewableUK feels that there should be an independent consultation, prior to consideration over its inclusion within national planning policy. RenewableUK also seeks further clarification as to the intended scale of LGS areas, as we believe the current wording contained within the draft NPPF to be overly simplistic and open to wide interpretation and possibly abuse.
3.2 **Question 2: Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?**

3.2.1 In RenewableUK’s view, the proposed framework for delivering NIAs and LNPs will not be effective because, as discussed above, more detail is needed on how the institutional framework would be set up and operate; the framework cannot function efficiently without the involvement of local businesses and communities from the outset. The channels for doing this are not clearly defined in policy at present; and there is a need for a clear policy direction of mutual cooperation and coordination of priorities and objectives at the institutional level which is currently not in place.

3.3 **Question 3: What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?**

**National Ecosystems Assessment**

3.3.1 RenewableUK supports the principle objective of the National Ecosystems Assessment (NEA) research, but asks that the development of further research proposals be conducted in an open and consultative way with a range of industry and environmental stakeholders, in order to learn most effectively from existing good practice and build on known successes. The role of renewable energy in preserving and enhancing ecosystems should be recognised.

**Research programme on soil degradation**

3.3.2 The NEWP states that Defra intends to conduct further research on how to best manage lowland peatlands in a way that supports efforts to tackle climate change. While RenewableUK welcomes the principle objectives of such research, we ask that
any work be conducted in a coordinated way across all parts of Great Britain bringing together Natural England, Scottish Natural Heritage and the Countryside Council for Wales, in order to resolve existing differences in approach and policy inconsistencies in the treatment of proposed development in such areas. We also recommend that any proposals for new research should first consider the valuable insights already gained from peat research, such as that conducted by Scottish National Heritage.

3.3.3 With regard to the development of wind energy on peatland, we recommend that any emerging policy reflect existing evidence that good practice in locating, designing and managing windfarms can lead to them being successfully accommodated within some areas of peatland, with minimal adverse environmental effect. Additionally, in some situations good practice can also deliver long-term peatland benefits including restoration of previously damaged habitats.

3.3.4 Therefore any policy developed as a result of Defra’s research should take into account not only the amount of carbon that is released into the atmosphere where windfarms are constructed in peatlands, but also the benefits of clean energy production, the offsetting of fossil fuels use and any restoration measures that are proposed on site. RenewableUK is eager to be involved in the formulation of any policy emerging from soil and ecosystem services research. The results of such research should also be peer-reviewed and robust.

3.4 Question 4: What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?

3.4.1 RenewableUK is not aware of any at the present time but remains keen to engage with DEFRA and statutory agencies further on this.

3.5 Question 5: What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’
provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

3.5.1 In the present economic climate, where LPAs and statutory agencies need to be better resourced, the NEWP initiatives will result in additional demands and responsibilities in a time of financial constraint.

3.6 Question 6: Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

3.6.1 It is RenewableUK’s view that LNPs have positive potential in this regard, however we question the creation of LGS as an effective means of increasing public engagement on environmental issues.

IV CONCLUSIONS

4.1 For the economy to prosper, it is necessary that the Government’s objectives on the Green Economy, the environment, planning and other national objectives work together through a cohesive and coherent vision, rather than in fragmented and divergent ways. In order to maintain business confidence and secure necessary inward investment in the UK, Government must work collaboratively across Departments to remove policy contradiction and minimise policy uncertainty.

4.2 It is vital that all initiatives take into account the contribution that renewable energy infrastructure deployment makes to the reduction of fossil fuel use and meeting the UK’s climate change targets. Any future action and policy resulting from the NEWP should not therefore result in additional barriers to renewable energy development.

26 September 2011
Written evidence submitted by The Institute of Chartered Foresters (NEWP 48)

1. The Institute of Chartered Foresters is the Royal Chartered body for forestry and arboricultural professionals in the UK. Our members practise in every branch of forestry and arboriculture relating to forests, woodlands and trees. We provide services to members including support and promotion of the work of foresters and arboriculturists; information and guidance to the public and industry; and training and educational advice to students and professionals looking to build upon their experience. We also regulate the standards of entry to the profession and offer examinations for professional qualifications. We are regulated by our Royal Charter and maintain a Code of Ethics and Rules of Professional Conduct for all members.

2. The Institute welcomes the opportunity to respond to The Environment, Food and Rural Affairs Committee's inquiry into the Natural Environment White Paper. Our members are involved in land management, and particularly woodland management at a practical, policy and academic level across England in both the Private and State sector. The forestry profession is committed to sustainable land management and supports the aims set out in the Natural Environment white paper.

3. Foresters share a common sense of responsibility for our natural environment. In an increasingly instant world, we think on a different timescale and sustainability is the central tenet of our management: far from being an abstraction, how the forest and the land will be in 50, 100 or 200 years time is part of every decision Chartered Foresters make. For foresters, end of the century predictions of climate change mean action today. In this sense the NEWP fails to reflect the dynamic nature of species and habitats in the UK. Without a strong focus on adaptation and helping manage change in nature, the approach outlined could have serious impacts within policy.

What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

4. Delivery of NEWP will depend heavily on partnership working – this will need to be stimulated, promoted and led. Forestry is exceptionally well placed to help deliver a transition to a low-carbon economy, while promoting the environment and helping people to reconnect with nature.
5. With half of England’s lowland woods unmanaged, bringing more woods into sustainable management must be at the heart of the vision for the future. Neglect of woodland rarely benefits the environment or biodiversity. Forests are England's most species-rich habitats. They are also complex, a lot more complex than simple conifer vs. broadleaved. Each stage of growth holds different species and a forest differs from a stand or plantation in the way different habitats are combined together. At the moment, Government studies show that birds, butterflies and flora are all declining in Britain's woods. The principal causes are lower light levels (lack of management, such as coppicing and thinning, and open space) and browsing by deer which are at historically high population levels. We can and must reverse these declines over the next decade by bringing more woods into management. Forest management is a win:win: the operations which help us obtain wood and timber sustainably almost invariably benefit wildlife and the wider environment.

6. There needs to be an adoption of a more pragmatic approach towards land management, reduction of regulation and an increased understanding of markets.

Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

7. This is difficult to say as the National Planning Policy Framework, if implemented as proposed, will run counter to delivery of NEWP, only taking account of designated sites as a planning consideration, not ecosystems or components of ecological networks, which are fundamental to NEWP. Indeed, almost all environmental issues need to be considered at the landscape level. LNPs need to take an integrated approach to land and consider natural resources and ecosystem services as well as wildlife. Natural resources such as aquifers and rivers are limiting factors to development. LPNs will need clear, objective leadership and should not be dominated by narrow interests - it is not obvious where this will come from, but objective leadership is key to success. This leadership needs to be reinforced and supported by professional knowledge and experience at a local and national level.

8. Forestry’s integrated management, as exemplified by the UKWAS standard, has a significant role to play at the heart of a smarter approach to land use. This requires building markets for wood, assisting forest owners to understand their resource and how it can be cared for as well as reducing bureaucracy and regulation that has a counter-productive impact. This may not be best delivered by NIAs and LNPs.
What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

9. The value of nature is already embedded into forestry policy through the UK Forestry Standard and Guidelines. What is not happening well is integration of forestry with other land uses. Further research is required to look at the economic impacts of the approach outlined in the NEWP and what impact it will have on rural and environmental businesses, green jobs/employment, markets and skills. Forests provide a huge variety of important benefits – timber, carbon, biodiversity, recreation, soil and water conservation etc, but only timber (and to a limited extent sporting) brings in income. Government is keen to explore how these services can be valued and paid for. Critically does the NEWP approach improve the cost effectiveness of land management delivery or does it make us more dependent upon grants and subsidies? The ICF suggests possibly not.

10. Traditional rural industries, especially forestry but also agriculture, are sources not only of renewable energy but also renewable materials such as wood and fibre. These industries are fragmented and diffuse. They can be highly important at a local scale but are in direct competition with highly consolidated global industries such as cement, steel and plastics that rely on fossil energy and depleting natural resources. We suggest that this market imbalance is a strong rationale for Government support for research into innovation and new technology into the production and distribution of renewable materials.

11. ICF believes a new vision for our landscapes in England is essential: we must think about optimising the wide range of benefits land can deliver, not simply maximising single products. This is the challenge for the NEWP: to see how different sectors can work together to meet each valid and differing aspiration as part of a whole, not as competing sectoral demands. Foresters recognise that forestry is about far more than timber – they now look to colleagues across the land management interests to equally recognise and understand how wildlife, timber and recreation can and do prosper within the same forest.

What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?
12. Unlike France and to some extent Germany and elsewhere in Europe, we have few communal or civic forests administered by local authorities – towns and districts. Thus, compared with Europe, the public have poor understanding of forest and woodland management because it is not part and parcel of life in their locality. So in the sense that LNP might engage with woodlands and forests, this will be a benefit, but only if there is the proper degree of professionalism in management. In many towns and regions across Europe the local forester is a civic dignitary like the doctor or the clergy. Sound management rests on sound advice.

13. Look to Scandinavia as a model of how forests and woodland are managed properly. Timber is a major export from all Scandinavian countries from utility poles from Finland to flat pack wooden furniture from Sweden. The Scandinavian countries are very focussed on sustainability and environmental management and forestry is a major contributor to GDP. In the USA the large deciduous forests across the east coast, which were havested in the past, are now all under sustainable management and regulation. A significant amount of this woodland is in National Parks but much of the land within the NPs is in private ownership, but its management is regulated, which is a major achievement in a country that dislikes Government regulation of any sort.

What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

14. The obvious resource required is funding. The amounts announced with NEWP are totally inadequate to realise the ambitions set out. Forestry delivers on ecosystems services but owners are not rewarded for it. The Ecosystem Markets Task Force must look at how land management practices can be valued in the market place. In doing so we could see tens of thousands of hectares of unmanaged forest brought into responsible management with considerable green jobs, carbon reduction and biodiversity benefits and, critically, support for the rural economy.

Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?
15. The ICF fully supports the Government’s aims to reconnect people with the natural environment. Knowledge of woodland management in particular seems to be lost from public perception. Recent cuts to government departments have created further barriers to general environmental education and recreation as well as specific partnership initiatives. This has not been sufficiently addressed in the NEWP. Cuts in County Council Rights of Way departments will result in degraded PROW networks for cyclists, horse riders and pedestrians. Cuts in Forestry Commission and Natural England are ending well established education services linked to a range of priority habitats, species and rural businesses. Cuts in Forest Research are particularly worrying in view of pest and disease threats, climate change and the need to increase the efficiency of timber production in our small densely populated country. Reductions in funding for the Public Forest Estate, National Parks, County Council and Local Authorities will not be replaced by volunteers to deliver services, previously undertaken by skilled professionals. Forestry’s integrated management as exemplified by the UKWAS standard has a significant role to play at the heart of a smarter approach to land use. Our central proposal is a simple and practical one. As custodians of woods and forests different skills are required to deliver efficient timber production, enhanced wildlife value, or improved public access and enjoyment. Forests need professional management to deliver this multiplicity.

16. Research on rural development by the Scottish Government has shown that a key means of engaging communities with the natural environment is through local employment in environment-based industries. This is especially so in rural communities where services such as schools and shops are dependent on continuing demand. Local jobs are a necessity. Forestry provides opportunities for long-term full-time jobs not only in forest management but also in services such as green tourism, recreation and wildlife management. The basis for secure employment is the application of professional skills to maintain a sustainable and adaptable resource coupled with research to engender innovation in supplying the emerging green economy.

17. The Government should recognise that the complexity involved in managing the use of land sustainably for the future cannot be delivered without commitment and professional involvement. The first step in breaking barriers and engaging the public must be a proper and thorough monetary valuation of the landscape including forests and woods, (see point 12 above). Once the public realise just how valuable the natural landscape is in terms of resources, carbon sequestration, absorption of atmospheric pollution and the concomitant benefits to human health (reductions on lung diseases etc), improvement in biodiversity etc, barriers will fall and people will engage. This is
achievable but does require objective professional leadership to manage the costs and benefits of the natural landscape. Without and objective measure of the value, any statements from Government about how it feels the landscape is important is subjective and susceptible to political changes.

26 September 2011
Written evidence submitted by The Association of Electricity Producers (AEP)  
(NEWP 49)

About AEP
1. The Association of Electricity Producers (AEP) represents large, medium and small companies accounting for more than 95 per cent of the UK generating capacity, together with a number of businesses that provide equipment and services to the generating industry. Between them, the members embrace all of the generating technologies used commercially in the UK, from coal, gas and nuclear power, to a wide range of renewable energies. Members operate in a competitive electricity market and they have a keen interest in its success – not only in delivering power at the best possible price, but also in meeting environmental requirements. Contact details for the Association are provided at the end of this paper.

What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

2. The Natural Environment White Paper provides a high level framework for future policy and legislative developments to protect the natural environment. However, more information on the overarching goals and the proposed measures for implementation of new initiatives, including government funding, is required to enable a detailed response.

3. As policy is developed, we urge prioritisation of the key challenges addressed by the White Paper, such that activity is focused on those sectors responsible for the greatest impact on ecosystem services (e.g. controls on housing development, agriculture, fisheries and transport policy), rather than those over whom the greatest direct control can be exerted (e.g. the industrial sector).

4. Actions to improve the environment need not and should not hamper sustainable economic growth. We do not consider that it is coincidental that the improvements in environmental quality over the last 20 years occurred during a period of sustained economic growth and growth in prosperity. The issue is therefore how to react to and address the overarching challenges identified in a way that does not hamper a recovery of sustainable economic growth.

5. Industry needs a clear sense of policy direction over time, and an understanding of when policies will be implemented in legislation and regulation. The introduction of new legislation should take account of industrial investment cycles by providing a long-term framework of priorities and targets to avoid the possibility of stranded assets. Full implementation of existing and currently drafted legislation is the most appropriate way to continue to reduce power sector impacts on ecosystems. In particular, legislation and regulation such as that
arising from the Habitats Directive, Water Framework Directive, Ambient Air Quality Directive, Industrial Emissions Directive and National Emissions Ceilings Directive sets challenging emission reduction targets and permit conditions on operators. As a sector we are on a trajectory to low carbon electricity generation, and this will help to mitigate one of the pressures driving future changes in ecosystems.

6. The White Paper aims to establish voluntary biodiversity offsetting change in a number of pilot areas. For this to be successful, the limits of what can be offset and the metrics used to assess the goal of “no net loss of biodiversity” need to be clearly defined. We support the approach of a voluntary trial in pilot areas to determine the feasibility of this approach and would welcome stakeholder consultation on the future development, if any, of this approach.

7. We would welcome the promotion of environmental education within schools. Power companies would willingly play their part in delivering this.

Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

8. The new initiatives could make a valuable contribution towards protecting and enhancing ecosystems. However, the White Paper does not contain sufficient detail on how the Nature Improvement Areas and Local Nature Partnerships will be established and function to enable assessment of how effective they may be. The reliance on a voluntary local approach adds further to the uncertainty.

9. To ensure that the initiatives are as effective as possible in delivering national targets, a national strategic framework is necessary to provide guidance on environmental priorities and ensure consistency with the National Planning Policy Framework and forthcoming Water White Paper. Such a framework would also ensure consistent decision-making across the country and would, therefore, ensure a “level playing-field” for industrial development.

10. There is very little public domain information available about the proposed Natural Capital Committee. In our view, at this early stage in the process, this should be an expert advisory committee to Government, tasked to provide an evidence base to inform future policy decisions. It should not have powers.

What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

11. The UK National Ecosystem Assessment sets out a conceptual framework for an ecosystem services valuation approach to nature protection. However, the science base and economic methodologies to value nature are not yet adequate as a sound
basis for regulatory or business decision-making. A robust process for the valuation of ecosystem services should be developed that:

- is founded on peer-reviewed and credible science,
- is accepted as credible by all parties,
- is open and transparent, and
- enables prioritisation, so that control measures are proportionate and cost-effective.

12. Economic efficiency should be at the heart of any green economy roadmap. It is essential to recognise that the investments needed must be economically efficient, and therefore economically rational, for those investing the very significant sums that will be needed.

13. In Section 4 of the White Paper, the statement is made that “the effects from particulate pollution alone are estimated to contribute to the equivalent of 29,000 deaths per year”. It should be noted that there remain significant scientific and medical uncertainties about the relative toxicities to humans of different components of atmospheric particulate matter, and in particular in linking this to emissions of NOx. There is little evidence that secondary nitrate aerosols formed from NOx emissions are associated with human health effects. Effective policy needs to be more subtle in identifying the key pollutants responsible for human health effects and in correct targeting of policies.

What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?

14. There is no evidence from other countries that the ecosystems approach encouraged by the National Ecosystem Assessment and Natural Environment White Paper (with systematic valuation of all ecosystem services) is currently a viable basis for general regulatory or business decision-making. However, other more specific initiatives proposed in the White Paper, such as payments for ecosystem services (PES) and biodiversity offsetting, have been successfully applied in other countries, e.g. payments for watershed services and wetland mitigation banking in the United States.

What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

15. Specific national goals for ecosystem protection will have to be developed before resource requirements and suitable mechanisms for raising and delivering funds can be determined.

16. At the current time we consider that neither the science base nor the economic methodologies are robust enough to fully embed the value of nature into policy
delivery. However, as part of any programme of investigation into ecosystem services valuation, we feel there is potential advantage in exploring the role, benefits and options for market mechanisms for the protection of valued ecosystem services.

Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

17. There are a number of factors that are common to the recent success of consumer-driven campaigns:

- A simple and compelling aim/objective.
- They do not harm the economic prosperity of the individual.
- Clear and transparent communications and appropriate feedback, i.e. it is clear how individual actions of consumers produce tangible, and valuable, results.
- The campaign objective is at a scale that is commensurate with the actions of (multiple) individuals.

18. This suggests the need for all initiatives arising from White Paper proposals to be absolutely clear on both what the objective is and how the actions that are prompted can deliver the objective.

19. There are many examples of good practice in harnessing and building on public enthusiasm currently in the power sector which are consistent with White Paper proposals. Many power plant operators are already proactive at a local scale in sustainability initiatives at their power stations, the construction of environment and education centres on power station sites, and in environment and energy initiatives in schools on issues such as climate change. Power stations often set up local liaison committees to ensure that the views and comments of stakeholders are understood and taken into account when operating or developing a power station. Companies may also set up volunteering days to enable staff to engage with local environmental and education organisations and will often support the work of bodies such as wildlife trusts.

Related matters

20. Where certain products can potentially have a large footprint on the natural environment abroad, the Government should encourage suppliers to provide information on the sustainability of their sources. Where this information is made publicly available, it can act as an incentive to improve sourcing policies without the need for regulation. In the electricity industry, the use of imported biomass for renewable generation has the potential to impact biodiversity abroad if not sourced sustainably. The requirement to report sustainability information under the Renewables Obligation has prompted many electricity companies to adopt voluntary sustainability policies for the procurement of biomass and has demonstrated that generators are already acting responsibly. The provision of
such information for large footprint products would enable the Government to monitor the extent of unsustainable practice and the impact on natural resources abroad. If an impact was shown to be large, regulatory instruments which targeted the specific products could be used to prevent such impacts.

26 September 2011
Written evidence submitted by Northumbrian Water Ltd (NEWP 50)

Executive Summary

1. Northumbrian Water Ltd (NWL) supports the Government’s ambitions as set out in DEFRA’s Natural Environment White Paper (NEWP). NWL believes that the water industry is and can continue to be a significant partner in delivering an enhanced natural environment as well as growth of the green economy, and that there are already many examples where this is happening. The discussions around the NEWP are an ideal opportunity to share best practice, encourage further partnership working and to identify gaps where Government support is desirable.

Mrs Heidi Mottram OBE

2. Heidi Mottram is submitting this memorandum in her capacity as Chief Executive Officer of Northumbrian Water Ltd (which includes Northumbrian Water and Essex & Suffolk Water companies). The group serves 2.4 million customers in North East England with water and waste water services and 1.4 million people in Essex & Suffolk with water services. Mrs Mottram is also a member of the Government’s Green Economy Council.

Main Points

3. Within DEFRA’s definition of ‘natural networks’ and ‘natural capital’ water is rightly identified as a very important component.

4. Water companies are already actively participating in numerous schemes aimed at enhancing the natural environment. NWL sees one of its key aims is to conserve and enhance the natural environment where appropriate, working to avoid, or minimise, adverse impacts through good land management and operational practice.

5. NWL has put into practice protected species management to protect and to ensure the survival of protected species that occur within our landholdings. In order to enhance our existing data in 2008, we began comprehensively mapping the type and extent of Biodiversity Action Plan (BAP) habitats on our landholdings and undertook specific
species surveys. To date, 69 BAP species have been identified with at least 11 priority BAP habitats including five waxcap grassland sites of international importance, 84 hectares of blanket bog and upland wet heath and 19 hectares of fen, marsh and swamp. Comprehensive data is now collated for waxcap grasslands, reptiles, butterflies, dragonflies, woodland, calcareous grassland and ponds. Recognising the power in partnerships we proactively seek to work with partners on land and conservation management, including all of our local wildlife trusts, Natural England, RSPB, the Broads Authority and others.

6. NWL supports DEFRA’s aim of establishing catchment level partnerships but urges that existing good practice is recognised and built upon. NWL believes that pro-active identification, investigation, monitoring and engagement through catchment management activities are important ways to reduce or prevent pollution at source. We have a long history of catchment management and have been a lead partner in many projects, most notably the Tees Water Colour Project and the award winning Trinity Broads Partnership which we formed with the Environment Agency, Natural England and the Broads Authority in 1998. To implement our catchment management programme, we employ a Catchment Team Leader and four Catchment Advisors covering the Northumbrian Water and Essex & Suffolk Water catchments. While the focus of their work is on reducing pesticide concentrations in the rivers, their remit covers many other diffuse inputs including water colour, nitrates and sediment.

7. The NEWP correctly identifies that enhancing the natural environment is not just about rural landscapes, but also about what can be achieved on more urban and industrial sites.

8. In the North East of England, NWL constructed The Howdon Wetlands on a derelict industrial site- the work began in 1999 and was completed in 2000 using spoil from the development of the tertiary treatment process at the sewage treatment works. There are two large ponds, a westerly pond with a large island in its centre and an easterly pond that has no island. There is what is best described as a deep moat, connecting the two ponds and which meanders around the site area, isolating some
substantial areas of land where wild birds can breed. There is a considerable mixture of shrubs, grasses and flowering plants scattered all over this site. A very large variety of flowering plants, trees and shrubs both native and introduced occur here and this site must rank as one of the finest florally rich sites along the banks of the River Tyne. A variety of dragonflies, damselflies, bumblebees and butterflies can be found at the site, recently Speckled Wood and Painted Lady butterflies have been spotted onsite, which is significant in this area of the country. Bird life that has been seen visiting includes Redshank, Oystercatchers, Swallows, Swifts, and House Martins and in previous years a pair of resident Swans has raised cygnets on the ponds. The site is regarded as a 'hotel' for migrating birds. As part of the Durham Biodiversity Action Plan (BAP) an Otter Holt has been constructed in early 2011, as Otters are a priority species in the BAP.

9. Sustainable Drainage Systems (SuDS) – NWL believes that SuDS play an important role in separating surface water from the foul system, providing a sustainable approach to flood management as well as enhancing the biodiversity of the environment providing natural habitat. With responsibility for drainage divided between a large number of organisations, the need for joint responsibility and action is needed if drainage and flooding issues are to be effectively addressed. Northumbrian Water has initiated a sustainable sewerage study on Tyneside and leads a project with the Consumer Council for Water, Environment Agency, Tyne and Wear Emergency Planning Unit and Gateshead, Newcastle, Northumberland County, North Tyneside and South Tyneside Councils, which will impact on 912,000 customers, 5 local authorities, 6,490KM of public highway and 87km of river. We hope that there will be continued focus on this solution, both as the NEWP process goes forward and within the forthcoming Water White Paper.

10. NWL supports the idea of the formation of Local Nature Partnerships (LNPs) and hopes the Committee and DEFRA will recognise the excellent partnership working that is already in existence. The £1M of funding that is being made available for 2011-12 should be accessible to already functioning groups that are working as *de facto* LNPs.
11. NWL has established the Kielder Water & Forest Development Trust, the first charitable trust to be set up by a UK water company with the aim of developing and managing a significant natural resource encompassing the UK’s largest forest and man-made lake. Partners include the Forestry Commission, Environment Agency, English Nature, the local Wildlife Trust, local business and local government as well as Calvert Trust, a charity which operates outdoor activity holidays for disabled children. This partnership has seen significant success in recent years which includes, the creation of the Tynedale renewable energy trail, growth in visitor numbers by 30%, the return of nesting ospreys and the construction of 12 affordable homes. It has also secured £5.6M of public private investment in infrastructure including a 26 mile multi-user track around the lake, wildlife hides and outdoor art programmes. This also covers the general management, protection and enhancement of the natural environment within the partnership area, creating both sustainable employment, tourism and safeguarding one of the last bastions of the red squirrel in the UK. At the micro/local level LNPs have the potential to be real drivers of the green economy and water companies are ideally placed to take a lead. We think the Kielder example shows the real potential for LNPs to make a difference.

12. The recent setting up of Local Enterprise Partnerships (LEPs) across the country, combined with new LNPs, offers an ideal opportunity to integrate the economic development and natural environment agendas. It would be very helpful if the Committee could further examine the scope for the two types of partnerships to work together, particularly as developing the green economy has been identified by Government as such a central part economic and sub-national policy.

Conclusion

13. The water industry is well placed to help deliver many of the aspirations contained within the NEWP. The Government should scope out and acknowledge where there is already positive work being undertaken, with a view to supporting and replicating successful models. To truly embed the ‘value of nature’ then mechanisms need to be devised which will continue to encourage the full participation of the business
community. This is perhaps easier in relation to companies which are subject to statutory regulation, but NWL would encourage the Committee to press DEFRA on the ‘how’ and the ‘when’ of implementation, as this seems to be the less focussed aspect of the NEWP.

14. We are grateful to the Environment, Food and Rural Affairs Select Committee for launching this enquiry and NWL is very willing to supply further information on any aspect of this evidence, in either a written or oral submission.

26 September 2011
Written evidence submitted by the UK Environmental Law Association (UKELA) (NEWP 51)

About UKELA

1. The UK Environmental Law Association (UKELA) aims to make the law work for a better environment and to improve understanding and awareness of environmental law. UKELA’s members are involved in the practice, study or formulation of environmental law in the UK and the European Union. It attracts both lawyers and non-lawyers and has a broad membership from the private and public sectors.

2. UKELA prepares submissions and advice to government with the help of its specialist working parties, covering a range of environmental law topics. This response has been prepared with the help of the nature conservation working party.

3. UKELA works on a UK basis and seeks to ensure that best legislation and practice are achieved across the devolved jurisdictions.

Introductory observations

4. UKELA welcomes the White Paper and the Committee’s inquiry. However, before addressing the specific areas requested we make the following observations.

5. The legal framework for protecting the natural environment and government policies complementing it has developed incrementally over a long period of time, particularly since the passing of the National Parks and Access to the Countryside Act 1949. Our domestic framework has been added to by legislation, policy and case law from the European Community and by international treaties. It is a complex and comprehensive framework. Whilst it is generally agreed it has not been completely successful, no-one can deny that as this framework has become more comprehensive and sophisticated it has become more effective. Where this framework has not been wholly successful this has been due to a combination of
factors, for example a lack of will or resources etc; not necessarily a failure of the legal framework.

6. One example of a successful statute is the Wildlife and Countryside Act 1981 which has been amended a number of times to incorporate new measures to improve wildlife protection. On the other hand, biodiversity is a concept first propounded at the Rio Conference in 1992 and immediately espoused by the Government of the day. Since then it has also been incorporated in statute. Firstly in section 74 of the Countryside and Rights of Way Act 2000 to be replaced by section 40 of the Natural Environment and Rural Communities Act 2006, imposing a duty on public bodies to conserve biodiversity. The provision is largely ignored. Other examples are noted in our answers to the Committee’s questions.

7. Our recommendation is that before any of the new initiatives set out in the White paper are implemented there should be a root and branch assessment of the present framework to establish what works and what does not: if not, why not: and what should be done to redress the problems. Only then can we have any idea whether these new proposals are necessary or appropriate.

8. Our view of the proposals in the White Paper are that they are too general and vague. Our experience as practicing lawyers is "the devil is in the detail". If any of these are to go forward they need much refinement for detailed implementation.

Specific questions

What actions are required across Government Departments, from local government and by civil society to deliver the White Paper's proposals to grow a green economy and reconnect people with nature?

9. It will be necessary to identify regulatory requirements to compel businesses to measure and reduce their impacts on natural capital. Without mandatory requirements this will not occur except in a minority of cases.
10. There needs to be clear aims and objectives at local and national levels within an agreed strategic framework and cross sectoral understanding, and agreement on their implementation.

*Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?*

11. Don’t know. The current proposals lack the detail necessary to comment.

*Local Nature Partnerships*

12. Important issues of detail that need addressing include: What guidance will be given to LNPs in terms of their broad role and functions? How will LNPs be constituted? How will funds be utilised? How will success be measured? Who will be responsible for providing advice and guidance and oversee their effectiveness? Given that the funds will only be available 2011/2012 what guarantees are there that LNPs will be sustained? What will be the role of Natural Value Ambassadors? Who will they work for (Defra?) and how will their effectiveness be judged? Will the 50 Natural Value Ambassadors be employed beyond 2012?

*Nature Improvement Areas*

13. Important issues of detail that need addressing include: What is the purpose of NIAs? The current proposals suggest that NIAs are a conduit to secure additional funding for at the moment 12 areas, to implement existing government policies. How will the 12 initial areas be identified? By competition is bizarre. Surely NIAs should be located in those areas that most need attention. Is there a limit on NIA size? Who will manage the partnerships establishing NIAs? What will the funds be used for? How will success be measured? Good baseline data is required. Given the plethora of countryside designations do we really need another one? Albeit not a statutory designation, it will clearly influence countryside management and planning. NIAs need to function within local, regional and national strategic agendas. They need to work within an agreed framework and be accountable.
14. The framework for delivering Nature Improvement Areas is very unlikely to be effective. As a "designation" this will be one of the least significant and, just like "Sites of Interest for Nature Conservation" which are also protected merely through planning policy, unlikely to be protected effectively. There needs to be a fundamental refocus on the absence of application by planning authorities of the policies in PPS 9 and its Circular (06/2005). If they were followed as they should be there would be a significant improvement in reconnecting nature. This needs to happen to allow NIAs the protection they need to make any difference.

*Natural Capital Committee*

15. There is no information in the White Paper about how / to what extent the Committee's advice must be taken into account / followed. A Committee reporting is ineffective if its advice is not duly considered and where appropriate followed. The Committee should have powers to enable it to obtain information about how its advice has been taken into account; and the recipient of the advice must be under some obligation to heed it / demonstrate how it has been taken into account.

*What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper's ambition to fully embed the value of nature into policy delivery?*

16. Sufficient information already exists to inform policy judgements. What is needed is for local and national government to give it appropriate weight in making decisions. There is a near total disregard to the policies of PPS9 as they apply to biodiversity generally. Planning authorities tend to take notice of European sites, SSSIs and species protected by the Habitats Directive, but beyond that their application of existing policy to protect biodiversity is inconsistent and in some cases non-existent. This arises due to a fundamental lack of education of planning officers in these areas. The situation will be further compounded by the probable loss of local government ecologists due to the funding cuts.

*What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?*
17. Biodiversity offsetting has limited success in the USA. The creation of wetland habitats in lieu of habitat loss is well documented. Success with other habitat types less so. The USA is also a big country having the land/water available to provide offsetting, unlike England.

What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

18. There has to be a fundamental decision made about the incentive or requirement that must be imposed on businesses/industry to make them wake up to the need to factor in ecosystem services into their operational decision. We consider the way to get spending to enhance the natural environment is to impose say a tax incentive to encourage businesses to choose options which enhance the natural environment; or to impose mandatory requirements.

Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

19. There are many existing initiatives and opportunities for engagement with the natural environment. We suggest that the funding is used to better publicise these, rather than create new ones.

Relationship of the White Paper initiatives with planning policy

20. Finally, the effectiveness of the initiatives set out in this White Paper depends on them being underpinned by strong and specific planning policy. We consider that the draft National Planning Framework is inconsistent with the aims and objectives of the White Paper and, unless amended, will undermine its implementation.

26 September 2011
1. We welcome the Government’s proposals and are particularly pleased to see an emphasis on encouraging behavioural change in communities, the role of partnerships, importance of catchment management and agreement on principles of conservation banking.

2. Last year we launched our new campaign to put water at the heart of a new way of living ‘Love Every Drop’. It’s a call to action to encourage our customers, communities, civil society, and stakeholders to fundamentally change the way we all engage with and use water. In responding to your questions, we’ve focused on those where we can feel we can add most value particularly in sharing our experiences of working with civil society through Love Every Drop and partnership working. We hope this is useful and if you’d like any further details we would be very happy to provide them or submit oral evidence.

**What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?**

3. Estimating the true value of water and other natural resources and systems is complicated and embedding this into decision making and policy delivery equally so. We are continuing to work with Defra to explore how we can advance the evidence base and thinking in this area.

4. A particular focus for us is assessing the value of water in nature and in its various uses for social, economic and environmental benefit, and the implications this has for the water abstraction regime. We published a report ‘A Right to Water’ \(^1\) earlier this year in partnership with Frontier Economics. In it we shared findings from our innovative study to explore options to improve arrangements for allocating water between the environment and water users, and between different users (such as agriculture, industry, public water supply and power). We looked at how the regime could be strengthened to meet the challenges of growth and climate change and found that innovative market-based approaches potentially offer more flexible ways of meeting these challenges in the future.

5. We continue to further thinking in this area through our sponsorship of the Cambridge University Programme Sustainability Leadership (CPSL) Collaboratory on Sustainable Water Stewardship. The programme includes a workstream on sustainable abstraction which, through a series of ‘gaming situations’ is exploring options for reform, including market mechanisms, to see how well they could work in practice. The project brings together senior representatives across key relevant sectors to work together to seek new innovative approaches and we are delighted Defra\(^2\) is joining us in this initiative.

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\(^1\) A Right to Water can be found at [http://www.anglianwater.co.uk/about-us/statutory-reports/01E8481FC5394ACDA4F919D9AB5BAFB.aspx](http://www.anglianwater.co.uk/about-us/statutory-reports/01E8481FC5394ACDA4F919D9AB5BAFB.aspx)

\(^2\) With Henry Leveson-Gower in particular
6. A potential barrier for this project is the availability and ease of access to relevant and robust evidence particularly information on how much water is taken from the environment. We’d also like to see easier access to fertiliser and pesticide application data in catchments to help target sources of pollution and encourage catchment sensitive farming measures. We’d like to see information made available without the need for Freedom of Information applications to facilitate further exploration of this critical area.

7. Another workstream in the CPSL Collaboratory programme is focusing on engaging with communities to promoting behavioural change particularly on water efficiency. This project again brings together representatives from a wide range of sectors to share their perspective and seek a collaborative response. It is looking at the various ways of motivating people to value water, to understand the wider benefits it brings to all our lives and to act in a way that reflects this. The project will deliver a practical behavioural change strategy tested through pilots in our region and refined into a strategy for wider adoption.

8. We’re pleased to be contributing to the evidence base in these important areas and results will be widely shared through the CPSL Collaboratory Sustainable Water Stewardship workshop next spring.

**Does the white paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?**

9. The barriers you identified reflect our experiences with main issues including demands on individual’s time, a lack of information about local opportunities and a need for expert advice for some types of local action. Other challenges we’ve come across include a lack of incentive or understanding of reasons to get involved, difficulties of changing routine and habitual behaviour ingrained for many years, how language used in engagement can itself become a barrier and more practical challenges for example a lack of space to install water butts or access to waste oil collection services.

10. Given the complexities of barriers and drivers for individuals we agree that multi-faceted approach to re-engagement addressing education, access both to information and to the countryside, voluntary action and health services etc. would work best. We already do a lot of work in these areas, and share some examples of our experiences below:

11. **Getting outdoors:** Our 10 water parks welcome over two million visitors every year who enjoy themselves on, in our around the water. With activities from fishing to sailing, cycling, watersports, birdwatching and osprey-spotting, we’re a leading provider of the public open space that’s absolutely vital to the well being of the families and communities in our growing region.

12. We’ve found partnership working very successful and our nature reserves are managed in partnership with local Wildlife Trusts. We are interested in the proposed Local Nature
Partnerships and would like to see opportunities to connect these with Local Enterprise Partnerships explored to ensure that health, wellbeing and economic prosperity are fully integrated in local decision making.

13. **Education:** Encouraging people to get outdoors alone is not enough. We need to encourage them to understand their impact and influence on the environment if we are truly to encourage them to change their behaviour.

14. Our Love Every Drop campaign launched last October does just that. Its all about helping people understand the realities of water use and climate change in our region and realise just how precious water really is. Through it, we are connecting people and the choices they make in their every day activities to their impact on the environment.

15. We want to help everyone see that by using water more wisely not only can they save money but they will help reduce carbon emissions, retain more water in the natural environment and allow water to be available for agriculture etc. Our metering and water efficiency programmes are designed to give the customer a choice of water-saving measures that suit their lifestyle and inspire them to have a positive impact.

16. Over the next five years we’ll install 183,000 meters in homes in some of the driest areas of our region taking us to about 80% domestic customers having a meter. This year we launched our five year programme to fit a range of water saving devices to 87,000 homes provided and installed free by qualified plumbers. What we’ve found particularly important in overcoming barriers to engagement is to use simple language, talking to our customers in the same way we’d talk to a friend or neighbour and to make it as easy as possible to get involved with the support of a trusted plumber. The results have been very encouraging with customers making average household savings of 40 litres a day.
17. Helping everyone understand why they need to act differently in the way they dispose of fats, oils, grease and unflushables is also critical. It costs more than £5.8 million a year maintaining and unblocking our regions sewers and also increases the risk of pollution. This could be avoided if these items were put into the bin instead of down the drain.

18. In the past we’ve tended to tackle the problem by clearing drains rather than addressing the cause by re-educating people and encouraging them to change their habits and behaviours. This year we’ve launched an industry leading social marketing campaign that seeks to deliver long term sustained behavioural change. It’s being piloted in Peterborough with domestic households and food service establishments and early results are very encouraging.

19. One of the initial barriers we found was a lack of awareness that it’s not just the responsibility of the local council or Anglian Water but that everyone plays a part in creating the problem and can play a part in the solution. So our campaign has focused on raising awareness of the problem, creating the conviction to act and making it easy to act by using practical giveaways such as sink strainers.

20. Getting the message across to people in a way that’s easy for them to understand has been critical. In Peterborough for example there are over 100 languages so we’ve translated our materials into the top three languages. We’ve also done research with customers to check we’re explaining what we want people to do in a way that makes sense to them. As a result, we’ve used a lot of rhyming messages which people told us they found most memorable.

21. An important and impactful way of communicating has been through trusted local sources. By working with key local stakeholders such as leaders of community groups who are respected locally, our message is more powerful and enduring as stakeholders are taking on responsibility for the initiative and maintaining interest in their neighborhood.

22. We’ve also found it’s important to have the mechanisms and interventions in place to help people change. For domestic customers we’re offering sink strainers and investigating how we can work with supermarkets and others to promote sanitary bags etc. For businesses, we’ve developed a pack with advice, posters and useful contact details and will be looking at options for improving waste oil collection in the future.
23. We’re continuing to monitor the results of our pilot and rolling it out wider in our region later in the autumn.

24. **Voluntary action:** We have been successful in developing the RiverCare project, with Keep Britain Tidy, which has over 1,000 active community volunteers. This project builds on our commitment in improving the quality of our regions rivers through our wastewater treatment sites but enables communities to take over where our treatment role ends by “adopting” stretches of watercourses. RiverCare groups across our region undertake litter picks, wildlife surveys, invasive species clearance and habitat management on a regular basis throughout the year.

25. Our RiverCare groups tend to have very high retention rates and the feedback we get from members is that they want to do more and contribute to regional and national projects. We’re delighted by this enthusiasm and are linking up with other organisations such as Wildlife Trust otter surveys and dragonfly project to help open up these kind of opportunities for members to get more involved.

26. We encourage our employees to get involved too through our new volunteering campaign ‘love to help’. Under the scheme Anglian Water matches up to 30 hours a year to help employees do more volunteering supporting Water Aid, River Care or local community projects.

27. We hope that the insights we’ve gained from our projects have been useful in your review, if you would like any more information or to see some of our projects first hand, we’d be delighted to arrange this.

*26 September 2011*
1. Introduction
Hampshire County Council has been invited by DEFRA to submit views to the Environment Food and Rural Affairs Select Committee on a number of aspects of the Natural Environment White Paper. The comments set out below are based mainly on comments provided on the pre-White Paper consultation in October 2011 and on subsequent briefing papers and decision reports to Members.

2. The pre-White Paper consultation
When the pre-White Paper consultation was published, the County Council welcomed the commitment to addressing the environment in an integrated way but expressed a number of key concerns and observations. These can be summarised as:
- The scope of the consultation document was too narrow, with a focus on the natural environment at the expense of other aspects of the environment (such as the built and cultural environment and depletion of natural resources) and did not take account of the totality of people’s connections with their environment.
- The terms ‘nature’ and ‘natural environment’ are open to misinterpretation and misuse.
- The language of ecosystem management will not engage people.
- One of the most effective means of securing multiple benefits from the environment is through Green Infrastructure planning, which has a wider remit than the natural environment.
- Connecting people with their local environment will require investment of resources from local government at a time when those resources are being depleted.
- The delivery of the White Paper objectives is in part dependent on effective structures for the delivery of ‘localism’ and these are not yet in place.

3. Response to questions from the Chairman of the EFRA Select Committee

3.1 What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

3.1.1 There is a cost to the national economy, both in the short and the long term, of not reducing the impact of our activities on the environment. These costs will emerge as a result of higher prices for raw materials and natural resources, higher costs in treating poor health and higher costs in mitigating the impacts of climate change. There is therefore a benefit to the national economy as a result of businesses and individuals reducing their environmental impact. However, there is often a cost to businesses, in terms of competitiveness, in changing management, manufacturing or transport processes that benefit the environment, and those costs should be offset, at least in part, by increasing incentives.
3.1.2 The challenges are in developing the evidence base for the real value of natural capital at a local level, in translating what that means, and in developing a ‘strategy’ that is embedded into economic planning. It is unlikely that, at present, those with the remit to develop the economy locally (i.e. local authorities, business organisations and businesses themselves) have the knowledge to embed the value of natural capital in the economy, or how to apply the principles. Until the Government develops its own thinking on this and engages with those organisations it will be difficult to respond to the White Paper’s objectives.

3.1.3 It will be important to maximise and build on existing initiatives. Sustainable business growth has been at the heart of the activities of the Hampshire Economic Partnership for many years. The County Council supports the Hampshire and Isle of Wight Sustainable Business Partnership which in turn supports businesses in adopting more sustainable practices as part of their activities.

3.1.4 In terms of reconnecting people with nature, area based management plans and strategies, prepared with cross-discipline and community involvement, provide the mechanism for articulating the values attached to the environment, whether economic, social or environmental. The approach to producing management plans in National Parks and AONBs is a model for this kind of working.

3.2 Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

3.2.1 The County Council supports the principle of Local Nature Partnerships, provided that it is a single partnership that covers the whole of Hampshire, that it replaces the Hampshire Biodiversity Partnership, that its remit and membership is extended to embrace all interests (social, economic, cultural and biodiversity) and that its focus is on delivery of projects on the ground.

3.2.2 The open invitation to bid for funding to set up Local Nature Partnerships has resulted in competition between areas where a single partnership bid would be more practical. Multiple Local Nature Partnerships within a County would place unnecessary demands on the resources of partner organisations, and the Government is encouraged to take this into account when considering bids.

3.2.3 Once established, a Local Nature Partnership can be an effective forum for the planning and delivery of integrated working. However, it should not be the sole mechanism for achieving action, and those activities, initiatives and programmes that develop outside the Local Nature Partnership but still deliver White Paper objectives should not be disadvantaged in terms of access to funding streams.

3.2.4 The County Council is more cautious about Nature Improvement Areas. Whilst the White Paper defines ‘natural environment’ fairly broadly, NIAs, as the key
mechanism for delivery, have one driver: to link, buffer and expand biodiversity. Any other benefits that derive from this are spin-offs rather than central to delivery. This undermines rather than reinforces the objectives for balanced integration in the White Paper.

3.2.5 The invitation to participate in a competition for NIAs is potentially counter-productive. In order to be able to bid, some form of partnership must be in place, and so the main source of applications will be from the protected landscapes (National Parks and AONBs) which are already receiving funding well above those areas outside. There has been no analysis of where there is greatest need for investment due to biodiversity being under particular pressure, nor of where investment would achieve the most multiple benefits, including for society and the economy. This should be an essential pre-requisite to determining the priorities for investment.

3.2.6 There is also concern that, as with Local Nature Partnerships, NIAs will become the focus for Government investment at the expense of work programmes that are equally valid, equally beneficial and equally capable of delivering White Paper objectives, but which fall outside an NIA. There are examples of such projects and programmes emerging through the Total Environment pilot being undertaken in Hampshire, which fall partly or wholly outside proposed NIAs.

3.2.7 Whilst the value of the natural environment to a strong economy and sustainable communities is recognised, the County Council is concerned about the impact that NIAs may have on essential growth, particularly in rural areas. Analysis of trends in Hampshire shows that there is a need for investment in the economy and housing to address a declining level of sustainability in rural communities. There is a risk that NIAs, with their focus on the expansion of ecological interest, will act as a constraint on essential development or economic activity.

3.2.8 As a result of these concerns the County Council is not actively engaging in NIAs and will be continuing to invest its resources in areas where there are demonstrable needs and where there are committed partnerships working to meet those needs.

3.2.9 With regard to the Natural Capital Committee, the White Paper appears to refer to its role as advisory. It is not clear from the White Paper what, if any, ‘powers’ the committee will have.

3.3 What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

3.3.1 This has been touched on in the answer to question 1. In breaking new ground the White Paper introduces new and complex concepts, including ecosystem services, natural capital and biodiversity offsetting. These have been the realm of specialists in those fields and are now being brought into the public domain. There is much to be
done by Government to raise the level of awareness of these concepts, to develop 
expertise within organisations and to provide advice and support to those 
organisations to help them translate the knowledge into policy and action. This 
applies to those with responsibility for land use planning, land management planning, 
economic development and community planning.

3.3.2 One of the key vehicles for addressing the value of nature in policy delivery is the 
National Planning Policy Framework. Hampshire County Council has submitted 
separate comments to DCLG on the draft statement. Amongst the County Council’s 
contcerns is the lack of clarity in the policy framework about what constitutes 
'sustainable' development. It is through the definition and the application of the 
policies for sustainable development that the value of nature will be recognised. At the 
present time the National Planning Policy Framework does not reflect or recognise 
the value of nature or natural capital as it is expressed in the White Paper, and so does 
not provide a framework for its consideration in planning policy at the local level.

3.4 What evidence is there from other countries that the approaches proposed in the 
White Paper can be successfully applied in practice?

This aspect has not been considered by the County Council.

3.5 What resources will be needed to fully deliver the White Paper’s ambitions and 
how can these best be provided? How might the value of ‘services’ provided by 
ecosystems to beneficiaries be translated into spending that will enhance the natural 
environment?

3.5.1 It is essential that Government ensures that appropriate structures for local 
government and 'localism' are in place. Currently there is a void between high-level 
national policy making and local planning delivery. With planning for transport, 
minerals, waste management, education, social care and flood management (all 
critical to the delivery of the White Paper objectives) resting with County Councils, 
and other aspects of land use planning resting with Districts, and both being linked 
with civil society and local communities, effective coordination between and across all 
levels of local government, and across sub-regional scale areas, is necessary.

3.5.2 If the White Paper’s ambitions are to be delivered, those with the responsibility 
for coordinating actions across separate organisations, developing policy, raising 
awareness, providing advice, implementing actions of the ground and measuring its 
success will need to be adequately informed and resourced. There are numerous 
references in the White Paper to the Government working with local authorities, and 
of local authorities being responsible for aspects of the delivery of the White Paper. 
Despite the White Paper’s claims that this does not pose any additional burdens on 
local authorities, the reality is that it will, and at a time when resources have been 
depleted significantly by reductions in public sector funding.
3.5.3 Much of the delivery of the White Paper will rely on the land management industry, which will need to balance the requirements for food and timber production (provisioning) with the delivery of other ecosystem services. There will be an economic cost to this and the Government will need to incentivise land managers. Similarly, encouraging businesses towards more sustainable ways of working will have an economic cost that will act as deterrent unless there are incentives. The alternative to incentives is for the costs of goods and services that meet higher environmental standards to be passed on to the consumer.

3.6 Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

3.6.1 The barriers to public engagement have been well articulated in the White Paper, and the ideas put forward would appear to address them. The acknowledgement of Green Infrastructure as a key mechanism for linking people and the natural environment is welcomed. However, it is again the translation of these aspirations into reality that presents the greatest challenge, given the financial and human resources needed.

26 September 2011
1. EDF Energy is one of the UK’s largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, combined heat and power plants, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including both residential and business users.

2. EDF Energy supports the proposals in the Natural Environment White Paper. However, we believe that the initiatives arising from White Paper proposals need to be clearer in specifying future objectives and in explaining how the proposed actions will deliver the objectives.

EDF Energy’s response to your questions

What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

3. EDF Energy considers the Natural Environment White Paper to provide a sufficiently high level framework for future policy and legislative developments to protect the natural environment. However, more information on the overarching goals and the proposed measures for implementation of new initiatives, including government funding, is required in order to develop future policy and guidance.

4. As policy is developed, we urge prioritisation of the key challenges addressed by the White Paper, such that activity is focused on those sectors responsible for the greatest impact on ecosystem services such as controls on housing development, agriculture, fisheries and transport policy, rather than those in industrial sectors where there are already extensive direct controls.

5. Actions to improve the environment need not, and should not, hamper sustainable economic growth. We do not believe that it is a coincidence that the improvements in environmental quality over the last 20 years occurred during a period of sustained economic growth and prosperity. EDF Energy feels that the issue is therefore how to react to, and address, the overarching challenges identified in a way that does not hamper a recovery of sustainable economic growth.

6. For sustainable development to occur, industry needs a clear sense of policy direction over time and an understanding of when policies will be implemented in legislation and regulation. The introduction of new legislation should take account of industrial investment cycles by providing a long-term framework of priorities and targets to minimise the risks of stranded investments. Full implementation of
existing and currently drafted legislation is the most appropriate way to continue to reduce power sector impacts on ecosystems. In particular, legislation and regulation such as that arising from the Habitats Directive, Water Framework Directive, Ambient Air Quality Directive, Industrial Emissions Directive and National Emissions Ceilings Directive set challenging emission reduction targets and permit conditions on operators. As a sector, we are on a trajectory to low carbon electricity generation which will help to mitigate one of the pressures driving future changes in ecosystems.

7. EDF Energy understands that the White Paper aims to establish voluntary biodiversity offsetting change in a number of pilot areas. For this to be successful, the limits of what can be offset and the metrics used to assess the goal of “no net loss of biodiversity” need to be clearly defined. EDF Energy supports the approach of a voluntary trial in pilot areas to determine the feasibility of the approach and we would welcome stakeholder consultation on the future development, if any, of this approach.

8. We would also welcome the promotion of environmental education within schools.

Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

9. EDF Energy considers the proposed new initiatives to have the potential to make a valuable contribution towards protecting and enhancing ecosystems. However, the White Paper does not contain sufficient detail on how the Nature Improvement Areas and Local Nature Partnerships will be established and function to enable assessment of how effective they may be. The reliance on a voluntary local approach further adds to the uncertainty.

10. To ensure that the initiatives are as effective as possible in delivering national targets, a national strategic framework is necessary to provide guidance on environmental priorities and ensure consistency with the National Planning Policy Framework and forthcoming Water White Paper. Such a framework would also ensure consistent decision-making across the country and would, therefore, ensure a “level playing-field” for industrial development.

11. EDF Energy believes that there is very little information available in the public domain about the proposed Natural Capital Committee. In our view, at this early stage in the process, this should be an expert advisory committee to Government tasked to provide an evidence base to inform future policy decisions. The Natural Capital Committee should not have powers.
What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

12. The UK National Ecosystem Assessment sets out a conceptual framework for an ecosystem services valuation approach to nature protection. The science base and economic methodologies to value nature are not yet adequate for regulatory or business decision-making. A robust process for the valuation of ecosystem services should be developed that:

- is founded on peer-reviewed and credible science;
- is accepted as credible by all parties;
- is open and transparent; and
- enables prioritisation, so that control measures are proportionate and cost-effective.

13. EDF Energy believes that economic efficiency should be at the heart of any green economy roadmap. It is essential to recognise that the investments needed must be economically efficient, and therefore economically rational, for those investing the very significant sums that will be needed.

14. In Section 4 of the White Paper, the statement is made that “the effects from particulate pollution alone are estimated to contribute to the equivalent of 29,000 deaths per year”. It should be noted that significant scientific and medical uncertainties remain about the relative toxicities to humans of different components of atmospheric particulate matter, and in particular in linking this to emissions of NOx. There is little evidence that secondary nitrate aerosols formed from NOx emissions are associated with human health effects. Effective policy needs to be more subtle in identifying the key pollutants responsible for human health effects and in correct targeting of policies.

What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?

15. There is no evidence from other countries that the ecosystems approach encouraged by the National Ecosystem Assessment and Natural Environment White Paper (with systematic valuation of all ecosystem services) is currently a viable basis for general regulatory or business decision-making. However, other more specific initiatives proposed in the White Paper, such as payments for ecosystem services (PES) and biodiversity offsetting, have been successfully applied in other countries, e.g. payments for watershed services and wetland mitigation banking in the US.

What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the
natural environment?

16. Specific national goals for ecosystem protection will have to be developed before resource requirements and suitable mechanisms for raising and delivering funds can be determined.

17. At the current time we believe that neither the science base nor the economic methodologies are robust enough to fully embed the value of nature into policy delivery. However, as part of any programme of investigation into ecosystem services valuation, we feel there is potential advantage in exploring the role, benefits and options for market mechanisms for the protection of valued ecosystem services.

Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

18. EDF Energy believes that there are a number of factors common to the recent success of consumer-driven campaigns:

- a simple and compelling aim/objective;
- they do not harm the economic prosperity of the individual;
- clear and transparent communications and appropriate feedback, i.e. it is made clear how individual actions of consumers produce tangible, and valuable, results; and
- the campaign objective is at a scale that is commensurate with the actions of (multiple) individuals.

19. This suggests the need for all initiatives arising from White Paper proposals to be absolutely clear on both what the objective is and how the actions that are prompted deliver the objective.

Related matters

20. Where certain products can potentially have a large footprint on the natural environment abroad, the Government should encourage suppliers to provide information on the sustainability of their sources. Where this information is made publicly available, it can act as an incentive to improve sourcing policies without the need for regulation. In the electricity industry, the use of imported biomass for renewable generation has the potential to impact biodiversity abroad, if not sourced sustainably. The requirement to report sustainability information under the Renewables Obligation has prompted many electricity companies to adopt voluntary sustainability policies for the procurement of biomass and has demonstrated that generators are already acting responsibly. The provision of such information for large footprint products would enable the Government to monitor the extent of unsustainable practices and the impact on natural resources.
abroad. If an impact was shown to be large, regulatory instruments which targeted the specific products could be used to prevent such impacts.

26 September 2011
Written evidence submitted by the Institute of Ecology and Environmental Management (IEEM) (NEWP 55)

Introduction

The Institute of Ecology and Environmental Management (IEEM), as the leading membership organisation supporting professional ecologists and environmental managers, welcomes the opportunity to comment on the Natural Environment White Paper Inquiry.

Institute of Ecology and Environmental Management
IEEM was established in 1991 and currently has over 4,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

IEEM is a member of:
- Society for the Environment
- European Network of Environmental Professionals
- IUCN - The World Conservation Union
- Europarc Federation
- Professional Associations Research Network
- United Nations Decade on Biodiversity 2011-2020 Network
IEEM comments on:  
Natural Environment White Paper Inquiry

Q1. What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

1. Introduction
   a. In working towards sustainable development and a green economy, IEEM urges the Government to recognise the three aspects of sustainable development – economic, social and environmental – and remember that they are interdependent and must be addressed together. Moving towards a green economy must also be about more than just reducing carbon emissions, we must protect and enhance our natural capital – the ecosystems and biodiversity upon which we depend – and take into account their true value, for example, to our economy and our health and well-being.
   b. Ecology and environmental management has the potential to play a significant role in moving to a green economy in terms of creating jobs, promoting sustainable development and sustainable business practices and also in protecting and enhancing our natural capital, upon which our financial economy ultimately depends.

2. Ecological and Environmental Management Knowledge and Skills Shortages and Gaps
   a. Regarding barriers preventing the transition to a green economy, IEEM would like to highlight the current knowledge and skills shortages and gaps in the ecological and environmental management profession. It is to our profession that businesses and industry will need to turn to access expertise and competence to enable them to move to a greener economic model in relation to biodiversity. Yet there is a danger that needs and expectations will not be fully met. Until now, anecdotal evidence has provided the only basis to support claims of skills shortages and/or gaps in the profession, but IEEM has recently published the findings of research it commissioned on this important issue. The report, Ecological Skills: Shaping the Profession for the 21st Century, found evidence of skills gaps and skills shortages that are crucial to our capacity to deliver a green economy. Some of the key findings from the report are included below.
   b. There are many emerging challenges for the ecological and environmental management profession, including:
      i. the requirement for ecologists and environmental managers to work effectively in multidisciplinary teams on a par with other professionals;
      ii. the need for improved collation and management (including quality assurance) of ecological data for national and international databases and access to these;
      iii. decline in the availability of both professionals and volunteers with fieldwork skills in both species identification and survey methods and

1 See The Economics of Ecosystems and Biodiversity reports (www.teebweb.org)
2 Freely available to download at http://www.ieem.net/skillsreport.asp
techniques (including the use of advanced technologies);
iv. the need for ecologists to understand and manage risk and uncertainty, and, furthermore, to be able to communicate risk, uncertainty and probability to clients and policy-makers;
v. the critical state of taxonomy and systematics, due to many factors, including the retirement of experts and the lack of investment in taxonomy by universities, statutory bodies etc.;
vi. the need for ecologists and environmental managers to have access to economic models and tools so as to be able to plan for sustainable development and incorporate ecosystem values into Strategic Environmental Assessment, Environmental Impact Assessment, Sustainability Analysis and Biodiversity Offsetting;
vii. soil science, environmental epidemiology (including biosecurity), microbiology, energy supply and its impact on the environment, and freshwater science were also priorities raised in our research;
viii. reduced resources for ecological and environmental management activities as a result of significant budget cuts across the statutory and education sectors and reduced margins in the consultancy and industry sectors in both Britain and Ireland;
ix. constantly evolving legislation and regulations and the lack of coherence between legislation at one level (e.g. European) and its application at another (e.g. national);
x. changes to the spatial planning system and the devolution of powers to local and neighbourhood levels;
xii. the lack of understanding of the concept of ecosystem goods and services amongst professionals, the public and policy-makers;
xiii. the need to adopt an evidence-based approach to demonstrate the benefits of biodiversity and ecosystem services;
xiv. the specific challenge emerging from those working in the marine environment to develop professionals’ appreciation that marine planning and monitoring requires different methods and techniques to those employed on land.

c. Knowledge Gaps and Shortages
i. Environmental economics, including understanding of ecosystem goods and services, is an area where not all professionals are fully confident that their knowledge is sufficient to meet foreseeable future challenges. There is a need for ecologists to emphasise the links to ecosystem valuation and biodiversity offsetting.
ii. Professionals recognise their lack of knowledge in freshwater, coastal and marine systems and processes (relative to terrestrial systems and processes). This is again confirmed by employers and stakeholders who have concerns that reduced funding will exacerbate the problem. Professionals not specialising in marine ecology have a poor understanding of marine systems and processes and that marine biotopes are subject to different planning principles to those that apply to terrestrial
environments.

iii. Professionals identified gaps in their knowledge of cartography and data, environmental management systems and audit, and industry and organisational structures.

iv. By contrast, professionals are relatively confident in their knowledge of environmental legislation and policy.

v. Microbiology was an area of knowledge need raised as a priority by a number of stakeholders in different contexts. For example, microbes in marine biotopes, micro aquatics, micro invertebrates, plant pathology and biosecurity.

vi. Stakeholders also drew attention to the need for ecologists to have a good understanding of the requirements of spatial planning systems at various levels and of construction techniques to mitigate threats to habitats.

d. Specialist Skills Gaps and Shortages

i. The erosion of skills in taxonomy and systematics which is giving cause for concern, as highlighted by the House of Lords Science and Technology Committee’s report in 2008: Systematics and Taxonomy Follow-up.

ii. Closely related to taxonomy and systematics are species identification skills. Species identification skills are reasonably good in respect of mammals, birds, reptiles and amphibians and higher plants, but poor in respect of fish, lower plants, lichens, algae and fungi.

iii. Professionals recognise there are gaps in their ecological survey, sampling, analysis, assessment, evaluation and monitoring skills, particularly in respect of invertebrates, fish and bird communities.

iv. Professionals are fairly confident about their skills in habitat creation, restoration and management in woodland, lowland grassland and urban/brownfield environments. They are less confident about their skills in marine, coastal and upland environments, where fewer respondents are required to practise. Stakeholders made the point that habitat translocation will become a skill increasingly in demand as a result of climate change and biodiversity offsetting.

v. There is an urgent need for ecologists and environmental managers to develop skills in the use of new technologies, particularly IT, mobile technology and genetics, which have the potential to revolutionise survey approaches.

vi. Other priority skills areas identified included developing effective and ethical approaches to invasive species and combating the spread of diseases.

vii. Finally, there is the need for ecologists and environmental managers to focus less on individual species or habitats and instead to take a landscape approach, recognising the importance of ecological networks and connectivity.

3. Recommendations

a. Regarding priorities for action, IEEM recommends that, in relation to the knowledge and skills gaps and shortages in the ecological and environmental management profession, a robust structure of education, training, continuing
professional development and accreditation must be developed. This will ensure the profession and its professionals are able to deliver the knowledge and skills required to achieve effective protection and enhancement of the natural environment, biodiversity and the provision of ecosystem goods and services which will underpin a green economy. The following recommendations collectively set out an ambitious but critically important agenda of actions.

b. Strategy for Education, Training, Career and Professional Development of Ecologists and Environmental Managers
   i. A strategy for the education, training, career and professional development of ecologists and environmental managers should be developed, including:
      1. the definition of a set of core competences;
      2. the definition of role profiles;
      3. a system of accreditation of first degrees and postgraduate courses based on a detailed Knowledge, Skills and Applications Framework;
      4. the definition of competence requirements linked to recognised professional standards and professional body membership grades;
      5. the production of materials and activities to promote the career opportunities in ecology and environmental management to secondary school and post-16 students;
      6. planning tools to help ecologists and environmental managers develop their careers and the competences required to take the next step;
      7. a system of accreditation for short courses;
      8. the accreditation of professionals’ specialist areas of competence;
      9. a structured approach to continuing professional development (CPD); and
     10. support to employers in providing structured professional development programmes.

c. Further Development of a Knowledge, Skills and Applications Framework (KSA)
   i. Originally conceived simply as a tool for identifying, classifying and analysing skills needs, the KSA Framework for Ecologists and Environmental Managers has developed into an important output in its own right, since it identifies the core knowledge, skills and applications for the profession.
   ii. The KSA Framework should be developed further, in particular:
      1. expanding the knowledge, skills and applications to finer levels of detail; and
      2. developing levels that describe the various depths of knowledge or skill required by professionals at different stages in their careers.

d. Addressing Knowledge and Skills Gaps and Shortages
   i. A strategy for addressing the knowledge and skills gaps and shortages identified in the above research should be produced to stimulate a range of accessible, flexible and affordable learning opportunities to meet these needs.
   ii. The priority knowledge and skills requirements identified in this research should be published. Members of the profession should be encouraged and
supported to address their individual CPD needs in these priority areas, either through self-study or through a range of accredited courses and other learning opportunities.

e. **Assuring the Quality of Professional Work**

   i. To ensure that ecologists and environmental managers deliver work to the highest standards (for example in survey work) a needs-based programme of training, tools and good practice guidance should be provided. Whilst not a regulated profession, self-regulation should continue to be promoted through membership of the appropriate professional membership body that has the mechanisms in place to take action against those whose competency falls below the required standards.

f. **Communicating the Importance of the Natural Environment, Biodiversity and the Value of Ecosystem Goods and Services**

   i. Communicating to and influencing politicians, policy-makers, other professionals and the public of the importance and value of the natural environment and biodiversity and the ecosystem goods and services they provide is fundamental to meeting biodiversity targets and hence human welfare requirements. Succeeding in this communications challenge will lead to a greater understanding and valuing of the role of ecologists and environmental managers in protecting and enhancing these assets which, in turn, will make a career as an ecologist or environmental manager more attractive to future generations. Key stakeholders should consider formulating a communications strategy to achieve these goals.

4. **Further Information and Engagement**

   a. IEEM would be pleased to provide further information and advice in the process of this inquiry or beyond should this be of value.

Q2. Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

5. IEEM supports the vision and positive intentions of the Natural Environment White Paper, however we are seriously concerned that the draft National Planning Policy Framework\(^3\) currently under consultation will seriously undermine this ambition.

Q3. What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

6. Further to our evidence provided for questions 1 and 2, IEEM has now commenced work on the Knowledge, Skills and Applications Framework (KSA) through a joint venture with the University of Portsmouth and has appointed a Knowledge Transfer Partnership

\(^3\) [http://www.communities.gov.uk/publications/planningandbuilding/draftframework](http://www.communities.gov.uk/publications/planningandbuilding/draftframework)
Accreditation Project Manager. This will develop a more detailed competency framework for the profession. Allied to this is the development of a graduate ecologist/environmental manager knowledge and skills matrix that will underpin the Institute’s accreditation of higher education course programmes that deliver the knowledge and skills that employers require. Consultation with recently employed graduates and their employers will lead to the production of graduate role profiles which can be used to promote the profession to potential students and to guide higher education course leaders on course content that supports the employability of their graduates. The Institute will look to accredit such courses through a formal accreditation process.

Q4. What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?

7. No comment.

Q5. What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

8. In addition to our previous comments, we are concerned about the effects of public spending cuts on the loss of local authority and statutory agency ecologists and the knock-on effects that this will have on our ability to effectively deliver the aspirations of the Natural Environment White Paper.

9. In answer to the second part of the question, regarding translating spending into enhancing the natural environment, IEEM would like to see the recommendations of the Lawton Review\(^4\) implemented and supported, the statutory sector strengthened, better biodiversity monitoring and data management, and better integration of biodiversity into the planning system.

Q6. Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

10. No comment.

26 September 2011

The Horticultural Trades Association (HTA) represents the majority of the UK’s ornamental horticulture and gardening industry, including a wide range of growers, retailers, landscapers, manufacturers and service providers. The industry has an annual turnover of £9 billion and provides 284,000 jobs in about 30,000 businesses across the UK.

The HTA welcomes Defra’s ambitious White Paper on the Natural Environment and submits the following response to the call for evidence for the EFRA Committee inquiry.

Q: What actions are required across Government Departments, from local government and by civil society to deliver the White paper’s proposals to grow a green economy and reconnect people with nature?

A: The White Paper states that it will put natural capital at the centre of economic thinking in growing a green economy. It also highlights the positive social, environmental and economic benefits that natural environments provide. For years, the HTA has promoted the benefits of green infrastructure through its Greening the UK campaign. Plants and trees are proven to:

- Absorb carbon
- Prevent flooding
- Reduce energy loads on buildings
- Diminish the effects of visual and sound pollution
- Reduce stress and illness levels, thereby improving productivity
- Improve hospital recovery rates
- Reduce crime and anti-social behavior
- Add value to property developments

In short, horticulture makes an enormous contribution to the UK’s environmental, economic and social well-being but until recently it has been difficult to accurately value the true monetary value of these benefits. However, Greening the UK has identified the Green Infrastructure Valuation Toolkit (the development of which was co-financed by DCLG) which captures the real value of green landscaping across eleven criteria (ranging from climate change to health benefits). The HTA believes this tool should be adopted nationally to help local authorities make a comprehensive and comparative study of all development plans prior to approval. This would help grow a green economy and reconnect communities with nature.

Q: Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

A: The National Planning Policy Framework will be fundamental to making this infrastructure a success. DCLG have publicly supported the Greening the UK campaign and emphasised the importance of proper planning of delivery of green spaces in the urban
environment. We had hoped that the role of green infrastructure would be enshrined in the
NPPF, and we are disappointed that it appears to have been omitted from the current draft.
National guiding principles are necessary. Whilst most local authorities, communities and
civic groups might have a general understanding of the aesthetic appeal of green
infrastructure, many will be unaware of its wider economic, environmental and social
contribution. There is also evidence that the level of planting and green landscaping in new
urban developments has almost halved over the last decade. It appears that some local
authorities lack the skills and resources to ensure the delivery of approved landscape plans.
The Natural Environment White Paper and the NPPF should not miss this opportunity to
reverse that trend.

Q: What further research and/or evidence is required to develop practical programmes
sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of
nature into policy delivery?

A: Significant research is required into the availability and quality of alternatives to peat if the
White Paper is to achieve its ambition in this area. Both the amateur gardener and
professional grower need to be convinced of the technical and commercial viability of peat
alternatives for this to happen. The Task Force will be helpful in identifying the real
challenges, but Defra should stand ready to provide any research funds necessary to help the
UK industry overcome these hurdles without damaging its commercial viability within the
EU Single Market.

More broadly on research and development, science is absolutely essential for the UK
horticultural industry to continue to deliver environmental benefits. In global competitive
markets, innovation is vital for the industry to improve productivity and efficiency, and to
keep ahead of plant health and environment issues. Defra’s exit from all direct funding of
research into ornamental horticulture has left the production industry with an uncertain
future. The only remaining source of funding is the small amount of funds from the levy
boards, which are further inhibited by the prohibition of match funding. Funding still goes
into blue-sky research through the Research Councils, but the research pipeline that brings
research through into industry application is broken. The HTA calls on the EFRA committee
to explore this problem as a matter of urgency.

What evidence is there from other countries that the approaches proposed in the White
Paper can be successfully applied in practice?

One needs to look no further than Scotland to realise that the greening ambitions in the
White Paper can be successfully embedded in policy. The Scottish Government has five key
goals: a wealthier, healthier, safer, smarter and greener Scotland. These principles underpin
Scotland’s second National Planning Policy Framework which places great emphasis on
greening urban areas. Greenspace Scotland recently launched the world’s first Greenspace
Map which provides comprehensive and detailed information on the location, extent and
type of greenspace across all of Scotland’s urban settlements (i.e. settlements with a
population of 3,000 or more). The Map categorises greenspace into 23 different open space
types (based on the typology set out in Planning Advice Note 65 Planning and Open Space); these include public parks, play areas, allotments, amenity greenspace and private gardens.

Stewart Stevenson MSP, Minister for the Environment and Climate Change, commented at the launch:

"It is vital that Scotland remains at the forefront of innovation on environmental planning and policy if we are to remain an attractive and environmentally progressive place to live and work. Scotland’s Greenspace Map provides a powerful resource that can now be used at a regional and national level to support the strategic management, planning and investment for greenspace. It aids spatial planning for improved health and regeneration, and is already being used to support development of the Central Scotland Green Network. At a time when finances are tight, this map will provide significant savings through data sharing and the wide access to it."

This is indicative of the SG’s approach to green infrastructure. The HTA would like to see similar explicit support for greening in Defra and DCLG policies.

We would happily provide oral evidence to the Committee on any of these areas.

26 September 2011
The National Federation for Biological Recording (NFBR)1 (NEWP 57)

The National Federation for Biological Recording exists to champion the UK biological recording community. NFBR promotes the collection, dissemination and use of terrestrial, freshwater and marine data to meet local and strategic biodiversity information needs.

We welcome the introduction of *Natural Choice*2 and its commitments, but consider that it leaves much to be clarified as to how it will result in sufficient, sustainable improvement, not least in influencing wider policies and those sectors whose actions have greatest impact on ecosystem services, biodiversity conservation and local quality of life.

1 **Actions required and NEWP delivery**

1.1 Realisation of the White Paper’s proposals, including the long-delayed promotion of a green economy and the reconnection of people and nature, will depend in large part on the quality of delivery plans and their implementation, as well as the funding and other support these receive: locally and nationally. Above all, there are questions of the extent to which the objectives of the White Paper will be furthered, constrained or undermined by the policies, actions, attitudes and spending of national and local institutions, communities and individuals.

1.2 At present, there is a significant gap between NEWP objectives and their delivery. Each Government department, agency and other public body needs to sign up to the White Paper and identify the extent to which it will help meet the NEWP commitments, and the targets of its daughter plans and strategies.

1.3 For example, the Lawton Review3 (MSFN) strongly emphasises the role, which the planning system needs to play in introducing a step change to environmental management across the UK. As illustrated by the UK National Ecosystem Assessment4, this is fundamental to sustainable development. Development can only be sustainable within environmental limits – that need to be identified and respected. However, the new draft National Planning Policy Framework appears to condense existing policy guidance, - which has failed to safeguard natural resources - without taking proper account of the NEWP’s commitments (e.g. Nature Improvement Areas, Local Nature Partnerships), its rationale or the UKNEA.

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1 [http://www.nfbr.org.uk](http://www.nfbr.org.uk)
1.4 The draft National Planning Policy Framework needs to be revised, setting out clear, sound policy, instrumental to ensuring that development not only protects but also strengthens the natural environment and to achieving NEWP objectives.

2 Institutional framework

2.1 The Government’s response to Making Space for Nature\(^5\), includes the statement that *Government will ensure that planning authorities are enabled to assess and identify local biodiversity assets and give them appropriate weight in local planning policies.*

2.2 At present, however, it is doubtful that many LPAs have a clear, adequately detailed and up to date understanding of local biodiversity assets (or invasive alien species) to guarantee that they are given adequate weight in local plans, policies or decisions; a situation exacerbated by a lack of specialist staff.

2.3 Inconsistencies in the extent to which local authorities give priority to the natural environment, utilise biodiversity information or meet other performance benchmarks identified by the Association of Local Government Ecologists\(^6\) need to be addressed. The hugely variable extent to which the NERC Act S.40 Biodiversity Duty is implemented by public bodies highlights the need for appropriate guidance, support and prescription.

2.4 Although access to nature and biodiversity conservation have demonstrable, multiple benefits, they generally feature too low in local authority priorities, particularly in areas of deprivation, for such benefits to be realised. Currently, relevant budgets for management works and employing skilled staff are being cutback out of proportion to other public spending cuts. Lack of support will undermine efforts to foster the activities of local ‘Friends of’ groups and other Big Society opportunities. An effective means of bridging the gaps between national goals and policies and local priorities and drivers needs to be found.

2.5 The scrutiny to be undertaken by the Minister for Government should be guided by the Natural Capital Committee, which should ecological and land/water/marine management expertise. With a solely advisory role, it is not clear how ‘NatCap’ will be able to impose unwelcome recommendations, however sound or necessary they may be.

2.6 Whilst the institutional framework is important, the funding provided to support NEWP initiatives is inadequate, e.g. in comparison to MSNF figures. What funding will there be to achieve NEWP objectives beyond the identified pilot periods?

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\(^6\) ALGE (2005) Increasing the Momentum
3 Research and evidence needs

3.1 Collection, dissemination and utilisation of high quality, up to date biodiversity information should be regarded as pre-requisite to informed policy, plan and decision making, to the identification of objectives or targets and to the monitoring of outcomes, progress, and the state of the environment, locally and nationally. Despite advances in the past twenty years, this has yet to be achieved, a significant failing that needs to be properly addressed.

3.2 With its delivery plan still awaited, the England Biodiversity Strategy 2020 provides little that is not contained within the NEWP. We welcome the importance it places on evidence, but would highlight the need for (1) an audit of biodiversity information, communication and support needs required to provide such evidence, local and national, and (2) a strategy supported by sustainable funding mechanisms to enable these needs to be met. This should enable government funding to be targeted to best effect, highlighting key gaps for environmental funders or Local Nature Funds.

3.3 Although the importance of a national ecological network is recognised, the National Biodiversity Network (NBN) needs to be better supported, e.g. improving funding mechanisms for local record centres so that they are better able to foster effective local recording and evidence use, support; facilitate the efforts of national schemes and societies and local groups, putting information to more effective use.

3.4 Lack of coordination has been an important part of the failure of conservation efforts. As part of the necessary step change, there is a need to integrate (a) biological records, monitoring or other ecological/environmental data, with the planning and reporting of (b) local and national biodiversity actions and (c) site conservation management. This should be achieved by (1) sharing data between existing, parallel information systems and (2) providing or modifying tools to benefit those involved in planning, carrying out or reviewing the outcomes of such work.

3.5 This would enable conservation work and funding to be coordinated across boundaries, target recording and monitoring to best effect, identify support needs and both gain from and support site evaluations for development including appraisal of mitigation/offsetting.

3.6 As important as harnessing a-c, is the need to make this information available, in an immediately useable form, for local community use. Provision of web-based, GIS tools, that can satisfy this need and be tailored to local purposes, whilst respecting data standards, is vital.
4  **Biodiversity offsetting - Local Nature Funds**

4.1 Biodiversity offsetting has been employed in the USA, but the fragmented, nature of the UK is generally very different. A variety of practices have been pursued in the UK, from mitigation confined to the development envelope to a general ‘biodiversity levy’, but a strategic approach has been generally lacking.

4.2 There has been no register kept of mitigation works (habitat creation/restoration) or associated monitoring, with the result that maturing sites have not been identified for species translocations. Nor have ideas about investing in proactive, ‘up-front’ balancing which could be conducted by local authorities or their partners (improving or connecting local wildlife sites), eventually paid for via development permitted elsewhere, five, ten or more years later on development land or windfall sites.

4.3 A rolling programme of work, involving sites for which adequate information is available, would be funded, via the development allowed each year, via green taxation nationally, locally or as a part of council tax/rates. Obligations on planning authorities and other public bodies, developers and other organisations that benefit from and/or impact on ecosystem services might also provide ‘local nature fund’ payments.

4.4 In selecting alternative areas/options, which provide sufficient, sustainable benefit there will be need for adequate information and longer term monitoring, building on the opportunity maps identified by regional BAP partnerships. Whilst information should be stored and accessible locally, it must also be made available nationally.

4.5 Properly managed, by the Local Nature Partnership, such land-based offsetting could be employed in a variety of ways, e.g. in areas within NIAs, in supporting management of the LWS network or improving the quality of connections within green grids/corridors (identified by LNPs/local BAP partnerships) and incorporated within local plan documents. LNPs will need access to adequate information (3.2).

4.6 Part of Local Nature Fund monies should be used in a flexible fashion to support activities that benefit biodiversity and local communities— including recording, training, provision of equipment and match funding for grant aid. It should not be regarded as a way of diverting local authority funds to other uses.

4.7 Different approaches will be appropriate to London and the Lake District, to woodland and the coast. A review of existing practices would provide a useful starting point for testing ideas through voluntary approaches.
5 Resources and Ecosystem Services

5.1 The Government needs to identify how the NEWP commitments, which are critical to changing the way the nation deals with the natural environment, will be funded. Since investing in ecosystem services will pay dividends overall, it is worth considering how this may be addressed through ‘green taxation’ nationally or locally, alongside existing funding arrangements.

6 Barriers to engagement

6.1 Despite the evidence of public support for biodiversity presented in the NEWP and the efforts devoted to the BAP process, current understanding of the importance of biodiversity in the UK remains relatively low within Europe. This is particularly so with ethnic communities, despite the work of groups such as the Black Environment Network.

6.2 In large part, this reflects the relative standing of the natural environment and natural history within official circles, nationally and locally, as evidenced by the proportion of GDP and local authority budgets. Whereas there are huge opportunities to be gained from the voluntary efforts focussed on aspects of the natural environment or the local community these need to be positively supported and guided rather than being viewed as a low cost replacement to local services. Although there are many examples of good practice, long-tem support (guidance, facilitation) for such efforts is often lacking, not helped by the short-term nature of most grant aid.

6.3 Although welcome, the £1.2M intended to further development of the National Biodiversity Network is a small sum which should be carefully marshalled to maximise its benefits. This includes development of open source software to further the recording, checking, management, accessibility and usefulness of information at local to national levels for different needs, e.g. the sharing of data from professional surveys or academic research, targeting the efforts of local surveyors and helping local communities to make use of local biodiversity information data for different purposes.

6.4 Effective engagement should combine support for groups that are already engaged and a gradual process of awareness raising and enabling measures addressing those groups that have yet to be reached. This is where local measures, building links between communities, schools, businesses and existing groups have a real role to play.

6.5 Recording and monitoring local wildlife, undertaking management or enhancement works and identifying future needs, provided it is easy to share and access information, will not only further stimulate awareness and involvement locally but contribute to and

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be coordinated with regional and national objectives. We consider this critical to building links between local communities, record centres and recording group; to the appraisal, effective management and monitoring of local wildlife sites, green corridors, ecosystem services and biodiversity offset sites; as well as to recruiting and maintaining a body of dedicated and skilled recorders across the country.

26 September 2011
Written evidence submitted by The Royal Institution of Chartered Surveyors (RICS) (NEWP 58)

The Royal Institution of Chartered Surveyors welcomes the Natural Environment White Paper inquiry by the EFRA Select Committee, in order to get as wide a possible range of opinions on the future of the natural environment, enabling a green economy and the future management of land. It also provides an opportunity to look at how the NEWP and its provisions operate within the web of other government reforms and initiatives, rather than being analysed in isolation.

- Broadly the Institution welcomes that the NEWP is a move away from seeing the natural environment as a separate ‘special interest’ and is trying to integrate it with wider economic policy and land use planning.
- The emphasis on green economy, natural capital and the valuation and management of eco-system services is one that land agents and surveyors believe has the greatest chance of engaging a rural England that is primarily managed through private ownership.
- The NEWP is also not just about designated sites; it is advocating a much more holistic approach to land management and the economy. This is something the RICS welcomes and applauds – but it is right to ensure that it is pragmatic and dynamic in its application.

The following response is the considered thinking of a group of RICS members drawn from our Countryside Policy Panel and our Rural Professional Group Board, representing the views and priorities of RICS members involved in land and natural environment management in the UK. These members work in organisations from the public, private and third sectors; all of whom are required by our Royal Charter to put forward their opinions as an RICS group, considering the public interest.

About RICS

RICS is the leading organisation of its kind in the world for professionals in property, construction, land and related environmental issues. As an independent and chartered organisation, RICS regulates and maintains the professional standards of over 91 000 qualified members. It regulates and promotes the work of these property professionals throughout 146 countries and is governed by a Royal Charter which requires it to act in the public interest.

RICS is the most significant body of UK surveyors and land agents, engaged in all aspects of land, forestry and property management in rural areas. RICS sets out its approach to rural communities, farming, forestry and natural environment, in its Rural Vision: http://www.rics.org/site/download_feed.aspx?fileID=8223&fileExtension=PDF

What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and
reconnect people with nature?

1. The NEWP needs to be firmly linked to other government policies and strategies, the most glaring of which is the National Planning Policy Framework. Without considering one in the context of the other, the government will not achieve the sustainable development and growth that the country requires, whilst expanding the green economy based on the valuation and management of increasing eco-system assets.

2. We would support the adoption of a more pragmatic approach towards land management, including reduction of regulation and an increased understanding of markets. Civil Society in particular needs to have increased information explaining opportunities in both local and global markets, to increase its understanding of natural environment economics. This is not presently considered in the UK Ecosystem Services approach.

3. The delivery of the NEWP will depend heavily on partnership working. This will need to be stimulated, promoted and led. And not just at national level between government departments and countrywide organisations, but also with new Local Nature Partnerships and the local authorities and communities they encompass.

4. RICS has been encouraging Local Enterprise Partnerships to set-up sub groups that look specifically at how land management and development can contribute to economic growth. In some cases we have been successful. DEFRA have decided to set-up parallel nature partnerships to LEPs, who have the potential to be natural adversaries to each other if vested interests prevail in either.

5. This will cause a fault line in terms of the management and valuation of eco-systems services by either LEP or LNP. To this extent we believe that the National Ecosystem Assessment must be used to factor in the value of eco-system services.

Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective? Does the proposed Natural Capital Committee have sufficient powers?

6. The decreasing funding for Natural England, Environment Agency and Forestry Commission is likely to make them more reliant upon a regulatory based approach and less so upon market creation and effective partnerships (which cost money and resource to develop and consult upon). Decreasing funding and the advent of Local Nature Partnerships have the potential to negate many established partnerships, as their members will have to chase funding for their projects elsewhere, whilst looking to LNP to set regional and local priorities.

7. As many County Councils have significantly reduced or removed their
biodiversity/ecological staff (e.g. Hampshire CC, Oxford CC) the structure of the LNPs and NIAs are only advantageous to large natural conservation NGO's and local authorities. Given the amount of land that is in private ownership and management in England, and much of our most environmentally valuable land managed by small private estates, LNPs need to be as open to the private as the public and third sectors. Without this balance, there risks the creation of decision making that is not in the public interest or integrated with other needs, such as economic development. A large question now hangs over the appropriateness of LNP decision making and implementation of NIA on the ground.

8. There is a lack of clarity as to whether DEFRA, CLG and BIS have jointly run scenario planning to look at how LNPs and NIAs would interact LEPs and EZs, preferably under the reformed planning system. Turning to the NIAs and LNPs in particular:

9. **NIA**: We believe there will need to be more than twelve NIAs to make a significant difference, and these would have to be on a landscape scale and not restricted in size such as the Enterprise Zones, which LEPs can create. NIAs need to be focused where they can make the most difference for ecological enhancement not just the already designated areas. Consideration needs to be given by DEFRA and CLG to weighting and planning status. The focus would ideally be on positive opportunity as well as protection.

10. **LNP**: LNPs need to work closely with LEPs, including joint working groups on land management and eco-system services, and not operate as separate economic and environmental silos. LNPs need to reflect the ambitions of NEWP and not just be a reconstitution of existing bodies such as Biodiversity Action Plan groups under a different name. LNPs need to foster co-operation and partnership working in strategic policy terms as well as land management on the ground. LNPs need to take an integrated approach to land and consider natural resources and ecosystem services as well as wildlife; in terms of scale this lends itself to County Councils.

11. The other designations outlined in the NEWP, such as local green spaces, have the capacity to create further confusion and complexity. Greater simplification must be an aim otherwise administration and management costs will use up more of the scare resources, rather than actual delivery and action.

What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper's ambition to fully embed the value of nature into policy delivery?

12. There needs to be a full study on the economic impacts of the approach outlined in the NEWP and what impact it will have on rural and environmental businesses, green jobs/employment, markets and skills. Critically does the White Paper approach improve the cost effectiveness of land management delivery or does it make us more
dependent upon grants and subside.

13. There are also excellent examples of Green Infrastructure strategies working in relation to the planning system. The RNRP Green Infrastructure and Environmental Character Suite is an excellent example of where natural environment planning has worked very effectively and achieved real results: http://www.rnrpenvironmentalcharacter.org.uk/

14. RICS can contribute its recently produced an information paper entitled ‘Green infrastructure in urban areas’. This underlines that the NEWP should not miss the opportunities for increasing natural capital in urban areas, both for its own biodiversity benefits, place making potential, but also reducing the impact of climate change.

15. Amongst other measures, green infrastructure comprises trees, green walls, green roofs, open spaces and the networks that emerge from linking these together. The provision of all of these gives rise to areas of practice where RICS surveyors have a key role to play in offering professional advice not just at the scale of the building but at the level of the city. A key focus of this information paper is to understand not just the intrinsic value of green infrastructure but also its economic value.

16. Green Infrastructure is also a key part of the rural sector and in many cases it will be delivery within the rural areas that will facilitate the delivery of many of these large projects. The interface between rural and the urban environment is key and does not seem to be recognised in the NEWP. This will also be critical for the delivery or piloting of any bio-diversity offsetting projects.

17. What the surveyor contributes, to choices about the various types of green infrastructure, is a keen understanding of the relationship between costs and value. The decision to invest in green infrastructure is one with long-term implications. It requires expertise on the appropriate measures to be taken in particular conditions, as well as an ability to provide value for money solutions. Whether surveyors are specifying roof covering, costing drainage schemes or appraising a development proposal, understanding the implications of green infrastructure is essential.

What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided? How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

18. As the valuation profession, and the one that provides surveyors, land agents and asset managers, we’d be concerned at creating an eco-system service market where there is no agreement on the difference between worth and value, let alone agreement on how to value eco-system services.
19. In the present debate we have economists, ecologists and sociologists attempting to define the value of eco-system services, without the input of the valuation profession. Our members will be the operators called upon by business and others to value eco-system services when business attempts to operate in this market. The risk is that a market will be created but that it will be artificial and that values will not drive the increase in environmental condition and bio-diversity that Government wish to see in the green economy.

20. RICS has produced guidance on the valuation of water and valuation of forestry (and also on valuation of trees and woodland for amenity value) but these are stand alone documents and not a comprehensive answer.

21. In DEFRA’s recent technical consultation paper on bio-diversity indicators, page 11, they are seeking sources of knowledge for the ‘Valuation and accounting for biodiversity’. RICS is happy to discuss further assistance to government in this area as outlined above. Furthermore we are about to initiate a large scale piece of research looking at the valuation of non-market goods (with a strong focus on eco-system services).

22. This will all help towards the assessment of natural capital too, though we would contend that there’s a substantial difference between attributing an economic worth to natural capital, and then assigning eco-systems a monetary value and constructing a market for their trading.

23. The eco-systems asset approach will require new skills and new partnerships developed to better integrate rural business and environmental enhancement. If this can be done through LNPs and LEPs, then professional land management expertise can develop and promote new approaches to land management and novel partnerships between the owners of land and rural entrepreneurs.

Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

24. The recent cuts to government departments have the potential to create further barriers to general environmental education and recreation, as well as more bespoke approaches and projects. This has not been defined in the NEWP or sufficiently addressed.

25. Cuts in County Council rights of way departments (for instance) will result in degraded PROW networks for cyclists, horse riders and pedestrians. Cuts in Forestry Commission and Natural England are ending well established education services linked to a range of priority habitats, species and rural businesses. Cuts in the Public Forest Estate, National Parks, County Council and Local Authorities will reduce the potential of national and local tourism thus restricting the 'paying back' potential to
26. The emphasis that is put on volunteers risks being inappropriate where volunteers may be responsible for delivering services previously managed by retained professionals, rather than expanding and deepening their reach into society.

28 September 2011
Thank you for inviting submissions. I comment:

- What actions are required across Government Departments, from local government and by civil society to deliver the White Paper’s proposals to grow a green economy and reconnect people with nature?

Agriculture and Rural Affairs need to be a part of the national curriculum from an early age. Farmers’ and landowners’ subsidies should be linked into a requirement that they utilise farms and rural property as an educational resource, for example, it should be a requirement that all children visit a farm at least twice every term for every year of their schooling. Farms that provide this should be eligible for additional subsidy. The science element of the national curriculum should focus and revolve around studies of our native species, farming methods and land types.

Regulators must continue to monitor the relationship of supermarkets and suppliers.

UK institutions (the armed forces, emergency services and educational establishments) should be encouraged to buy British. The benefits of low food miles, quality produce and good livestock husbandry should be better conveyed. Efforts should be made to create patriotism for home grown and manufactured produce.

We should emulate European branding and labelling of food and intensify appropriate use of, for example, the “Red Tractor” logo.

- Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective?

To some extent, but arguably these schemes will serve to reduce production and prevent development in some areas.

- Does the proposed Natural Capital Committee have sufficient powers?

From the limited amount of information available, the NCC does not appear to have any powers. It seems only to have duties in respect of reporting and liaising. It would be helpful if the NCC had the authority to issue some form of funding or credit system - perhaps as tax offset for environmentally friendly behaviour etc.

- What further research and/or evidence is required to develop practical programmes sufficiently detailed to deliver the White Paper’s ambition to fully embed the value of nature into policy delivery?

Scientific evidence identifying the benefits of rural living and healthy living and eating on life expectancy, health, education etc.
• What evidence is there from other countries that the approaches proposed in the White Paper can be successfully applied in practice?

I regret I have no knowledge of other countries' approach(es)

• What resources will be needed fully to deliver the White Paper’s ambitions and how can these best be provided?

educational resource — from new and existing teachers

financial resource — perhaps via tax credits as opposed to further funding

• How might the value of ‘services’ provided by ecosystems to beneficiaries be translated into spending that will enhance the natural environment?

This assumes that direct spending into the natural environment will enhance it — I question that. Responsible stewardship and sound environmental practices, together with an enhanced public awareness would achieve much. The investment is not so much required into the natural environment but in areas that overlap with it — farming, land ownership, education.

25 July 2011
Written evidence submitted by Miss Maria Crastus (NEWP 60)

- Will the institutional framework outlined for delivering the proposals (in particular Nature Improvement Areas and Local Nature Partnerships) be effective?

1. The focus on delivering biodiversity on a landscape scale, particularly through NIAs, is widely welcomed because there has to be an overview of how all local authorities are working towards the same goals. However, in urban contexts such as London, and particularly in inner cities, landscape scale conservation is often impracticable because there are only small and isolated patches of green space. There is therefore a fear that if the new legislation is to signal a major move away from targeted, site-specific action on habitats and species, then biodiversity delivery could become meaningless in several inner city boroughs, because they would not be able to achieve the habitat connectivity that is possible in places with large areas of green space.

2. The risk of biodiversity falling off the agenda would be even greater in areas of high social deprivation, where biodiversity is already lower on the political agenda than in other places, and understandably so because people have greater concerns about crime, housing and jobs. For these reasons, if the message coming through from central government is that the only biodiversity delivery which matters is that on a landscape scale, then there could appear to be little point in delivering it in inner cities. Just one of the reasons why this would be a great shame is that many people live in inner cities, and they are often the only places where people can encounter biodiversity locally and become interested in it.

3. The case of inner cities therefore shows that, whilst advancing the landscape scale conservation agenda is absolutely required and will be key to the future of biodiversity, it is equally important to recognise the place that targeted actions will have in that agenda.

4. Further problems could arise with reconciling the move towards landscape scale conservation with the new national focus on a Big Society. The Big Society does definitely have a key role to play in landscape scale conservation, but for it to do this assumes either a significant amount of information and knowledge on the part of the Big Society, or the provision of it to them. And because the Big Society could not be expected to come up with the wider strategy itself, a significant degree of government intervention would be needed in order to provide the information and tools for local groups to be able to see how what they are doing in a particular area fits into a bigger project.

5. Though if the state’s role did shift from that of controller to that of facilitator in order to encourage local communities to work towards landscape plans, it would bring its own equally heavy resource pressures to bear. Local groups would not have all the requisite skills and would not know exactly what needed to be done, so the public sector’s role as provider of information to them would end up being a very resource intensive and time consuming strategy.
6. There is also a lack of confidence about the chances this strategy would have of success, because many people believe that community groups are often parochial, generally concerned about their immediate local surroundings, and not about much beyond that. They might therefore not necessarily be worried about what is going on in neighbouring areas, so there is some doubt that sufficient numbers of them would have enough interest in contributing to a landscape plan.

7. The formation of LNPs could be very valuable from a funding perspective. If statutory and third sector conservation organisations could make their activities relevant to a more diverse range of other environmental agendas, such as climate change, ecosystem services, and green infrastructure, this could give them access to a wider portfolio of funding opportunities from these other policy areas.

- What resources will be needed to fully deliver the White Paper’s ambitions and how can these best be provided?

8. Any notion that the Big Society will come cheaper than Big Government was quickly dispelled by the people interviewed, because people believe it is a myth that a reliance on voluntary groups is any less resource intensive than having paid staff. For either a council or a charity to encourage more volunteer involvement is a time consuming and costly exercise, and they need skilled, paid people to lead the volunteers, not only in order to provide them with tools, but with a fun experience as well. This is because it cannot just be a case of giving a group of volunteers a mundane task to do seven days a week, because they will not find it fun anymore, and they will be disinclined to continue volunteering. This is particularly the case with those conservation tasks that are less glamorous or attractive, such as digging and pulling out brambles or bindweed, after a few days of which volunteers are unlikely to want to come back.

9. A council or a charity therefore needs to have a diverse programme that covers all the skills and physical abilities of the individual volunteers in order to make sure they keep coming back. All of these elements cost time and money, and without the funds to cover this, a volunteer programme is unsustainable. Many council officers say that a cost saving could be made if they could have a paid, in-house volunteer leader who could work across several council departments, but also that such posts are not seen as a priority in the present climate.

10. Community groups have historically been very dependent on local authorities not only for funding, but also for assistance with writing grant applications for funding from alternative sources such as the Heritage Lottery Fund, SITA, BIFA, and the Landfill Communities Fund. This is because many community groups do not hold the necessary expertise within their ranks to be able to do these applications on their own. This leads many people to believe that the Big Society idea of local groups surviving on their own would not work, because they depend on the local authorities for advice and encouragement on so many aspects of their work. Many people thus feel that if the local authorities were to pull away from the local groups and withdraw their funding and support for them, a large
number of them could go into terminal decline. There remains the possibility that community groups will still be capable of applying for smaller amounts of money without the support of local authorities. Even with these, though, many more groups will be bidding for an ever diminishing resource, and inevitably they cannot all be successful.

11. Many community groups also depend on the larger voluntary organisations such as the British Trust for Conservation Volunteers (BTCV), whom they are often affiliated with, to provide them with start-up funding and with their know-how on how to lead teams of volunteers. Community groups could therefore be equally badly impacted by the loss of the large organisations’ core funding from councils as they would be by the loss of their own core funding.

12. There is evidence to suggest that those local authorities whose LBAPs have been successfully integrated in other council functions such as housing, social services, health, and education, have a better chance of retaining their biodiversity officers in the midst of the spending cuts than those boroughs that have more stand-alone LBAPs. This is because it gives LBAP coordinators a greater cross-cutting role, and makes them less expendable. It is also very important from a funding perspective, because if nature conservationists can demonstrate, for example, that they are working to create new habitats around housing estates, helping to build cohesive communities, encouraging more active lifestyles, or engaging young people, then their LBAPs have a greater chance of receiving funding from the council departments whose remits include these things. This in turn will increase their chances of being able to continue funding at least some of the voluntary groups in their boroughs. It also helps LBAP coordinators to justify why they are working with certain voluntary groups to other people within the local authority.

13. It also came to light that in some circumstances, it might actually be possible for local authorities to undertake biodiversity actions which could also save them money. For example, by not cutting grass, a council could save on the mowing costs and also theoretically improve the biodiversity value of some areas. But the problem with this strategy would lie in convincing the decision makers within the local authorities of its value, because there is a feeling that it would be hard to get them to change their ideas and approaches.

14. Among the groups conspicuous by their absence in the BAP process are allotment associations. Some people explained that city allotments represent a vast untapped resource for biodiversity enhancement, and that inviting members of allotment associations to BAP meetings would offer great potential for “spreading the word”, because they could then go away and educate their other members about best gardening practice. Allotment associations have the added advantage that they could easily secure funding for biodiversity work, because for several years now there has been a growing interest on the part of funding providers in local food production, and in reducing food miles.
• Does the White Paper set out an accurate assessment of the barriers to public engagement with the natural environment and make the most effective proposals for re-engagement?

15. The ecosystem services approach could have some significant benefits for public engagement with the natural environment. Some London boroughs are looking at completely throwing out their standard Habitat and Species Action Plans and writing new theme-based BAPs that more strongly incorporate the ecosystem services approach. Examples of these themes are the built environment, enhancing the ecological network, climate change and sustainability, and connecting with nature. It is hoped that the new-style BAPs will better engage with the people who local authorities really want to reach – the public, and particularly developers, because one of the best ways of improving biodiversity in the boroughs is through new developments.

16. The old-style BAPs often did not succeed in engaging with developers, because if the BAPs’ specific actions for habitats and species, such as those for meadows or stag beetles, were not affected by a proposed development, then the BAPs were of no relevance to the developer, and there was no incentive for them to consider the impact a development could have on the local biodiversity. If the new-style BAPs, however, say that 30% of all new developments need to have green roofs by a certain date, then developers would need to consider this. Indeed, getting biodiversity gains through the planning process will be increasingly significant, given that the benefits to developers of including biodiversity in their bottom lines are now well recognised. In this respect, many people see ecosystem services as a great opportunity for wider engagement, and one that would be missed if the BAPs kept to the narrow confines of Habitat and Species Action Plans.

25 October 2011
The Forest Town Nature Conservation Group (FTNCG), located in Mansfield in Nottinghamshire, wish to make the following outline points:

1. The Government should undertake a commitment to ensure that any changes to the planning system, such as the removal of regional strategies and the introduction of the National Planning Policy Framework, do not result in a net loss of environmental protection and enhancement. For example, East Midlands Regional Plan Policies 1 and 29 were cited by the Planning Inspector (PINS ref 2102006) to help protect the natural environment from inappropriate development. We are concerned that without such policy protection, nature conservation interests may be compromised.

2. A priority for Government should be to ensure that all areas that have a reasonable possibility of becoming a Special Protection Area (SPA) in the future, e.g. areas that meet the Stage 1 criteria (such as the suggested Sherwood Forest SPA), are swiftly designated as pSPAs. Such a designation would help provide clarity for Planning Authorities, prevent damage through inappropriate development, and comply with the UK’s international legal obligations. The National Planning Policy Framework could also address the need to protect pSPAs, but this cannot be left for the Biodiversity Strategy, as the UK has already fallen behind in our SPA designations.

3. We are concerned that there may be insufficient safeguards to prevent inappropriate development on environmentally valuable sites as an outcome of the permissive nature of Neighbourhood Plans and Neighbourhood Development Orders, and the general presumption in favour of “sustainable development”.

4. Greater powers should be given to planning authorities to enforce restoration conditions, including enhanced powers to levy financial penalties. This is in keeping with the notion that: “We must repair the damage done to our natural environment by restoring natural connections that have been broken” [Para 2.5]. It should be made explicit that where restoration conditions are extant, the fully restored site should be used as the baseline for any comparative environmental impact assessment.

5. Bodies, such as Natural England, should be empowered to object wherever they feel a proposed development would have a negative impact on the environment, whatever the status of the proposed development site.
6. To ensure “easy access to information and advice about the natural environment” [Para 2.31, also see 4.45] the Government should make all information held on public registers (e.g. information about environmental permits issued by the Environment Agency) available over the Internet free of charge.

7. We would like to know more about how civil society can engage as partners in the proposed Green Infrastructure Partnership.

8. We suggest that the research referred to at Para 2.63 and the Task Force mentioned at Para 2.66 should investigate the services provided by digestate from anaerobic digestion in terms of counteracting and preventing soil degradation and erosion.

13 June 2011