

Response to “An Invitation to Shape the Nature of England” Discussion Document



This is a response to the discussion document on behalf of the Buckinghamshire and Milton Keynes Biodiversity Partnership.

It is based on views that were obtained through the following methods

1. Discussion at core partnership (Steering Group) meeting
2. Consultation event open to all partner organisations
3. Email consultation of draft response to all partner organisations

Views presented in this response are founded on a general consensus on behalf of BMKBP; however individual organisations may also take their own corporate view.

Partner organisations taking an active role in this response include local authorities, statutory agencies, local civil organisations and parish councils.

The following organisations contributed to the response.

- Aylesbury Vale District Council
- Berks, Bucks and Oxon Wildlife Trust
- Buckingham Town Council
- Buckinghamshire & Milton Keynes Environmental Records Centre
- Buckinghamshire County Council (Natural Environment Team)
- Bucks Amphibians and Reptiles Group
- Bucks Fungus Group
- Butterfly Conservation Upper Thames Branch
- Campaign to Protect Rural England - Bucks Group
- Chalfont St Peter Parish Council
- Chepping Wycombe Parish Council
- Chesham & District Natural History Society
- Chiltern Society
- Chilterns Conservation Board
- City of London
- Environment Agency
- Lane End Parish Council
- Milton Keynes Council
- Milton Keynes Natural History Society
- Natural England
- Risborough Countryside Group
- South Bucks District Council
- Wycombe District Council

We have not responded to all the questions in the Discussion Document because Questions 5 and 14 fall outside the remit of a Local Biodiversity Partnership. It does not mean that these are not viewed as important questions however and responses to them may well be included in individual organisations’ submissions.

For each question there are approx 3 key recommendations highlighted at the beginning of the response followed by more detail and further recommendations.

The key themes that are repeated in the responses to many questions are summarised below:

Ecosystem Services Approach & Landscape Scale Delivery

We fully endorse the approach which delivers benefits for biodiversity and the natural environment through landscape scale visions. The landscape scale approach will both create a landscape that will reverse the trends in the loss of biodiversity, it will also provide the services known as ecosystem services such as health benefits, flood storage and pollination and will demonstrate the importance of the environment to all sectors of society.

Local Actions

We support mechanisms that will enable people to make a positive contribution to their local environment. However voluntary organisations require support and funding and this needs, at least partially, to be coordinated by government.

Local Biodiversity Partnerships

Local voluntary organisations are often excellent at developing projects “on their own patch”, but may not be so good at seeing the bigger picture, in this case landscape scale biodiversity delivery and the wider impacts of ecosystem services.

There needs to be a mechanism that creates a link between the civil society organisations and the strategic level landscape scale thinking.

This mechanism already exists – it is Local Biodiversity Partnerships which need to be resourced with long term funding.

Planning Policy

Mechanisms in Planning Policy need to be revised to deliver biodiversity gain through the planning system.

Local Plans need to identify green corridors and ecological networks (as stipulated in PPS9)

Any system such as Biodiversity Offsets needs to be designed so that it will deliver appropriate mitigation and compensation for biodiversity.

Environmental Stewardship

Current environmental stewardship schemes are playing an important role in the reinstatement of the biodiversity of our countryside. However they need to provide a greater financial incentive to landowners and also need to target the creation of ecological corridors and networks in order to deliver landscape scale biodiversity benefits.

Education

We need to ensure that biodiversity conservation and natural processes are taught in schools and colleges using both international and local examples. Local voluntary organisations can play a large role in this.

We also need to ensure that the value of the natural environment is also put across to the general public and that the positive role that individuals and small organisations can play is shown in a positive light.

Question 1

What do we need to do to embed the true value of our natural resources in decision making at all levels?

- a. How can we reflect all the different kinds of value described above?**

Key Recommendations

1. There should be policy support for landscape scale biodiversity projects, with a full embedding of the ecosystem services provision throughout all government departments, through a new statutory national spatial and strategic framework.
2. Planning policy should ensure that ecological networks are identified in local planning policies and that statutory protection is given to Local Wildlife Sites.
3. The current mechanism for linking strategic level biodiversity delivery with local on the ground actions must be continued and funded sustainably. This mechanism is Local Biodiversity Partnerships.

Detailed Comments

We advocate that an ecosystem services approach is taken, in order to embed the natural environment in decision making at all levels. This will allow a holistic approach for the decision making which affects our natural environment. It recognises the importance of the environment to all sectors of society.

In order for ecosystem services to become the standard approach, the following issues need to be addressed.

National Policy

There should be a new statutory national spatial and strategic framework to drive integrated decisions about land use and land management. New powers and duties need to be placed on government departments, agencies and authorities to promote ecological security and ensure ecosystem health through the ecosystems services model. This would help ensure that decision making is beneficial to biodiversity, environmentally sustainable, and is also aligned to other policies, both strategically and geographically.

Biodiversity benefits need also to be built into other policy areas eg health, crime reduction, flooding and climate change.

These will help embed the concept of ecosystem services into these other agendas and provide the beginnings of a multi-disciplinary approach to the management of our natural resources at a landscape scale.

The public perception should be one of comprehensive and coherent joined up thinking across all levels of government.

Planning Policy

We need increased levels of protection for sites and priority habitats. This should include granting statutory protection to Local Wildlife Sites.

There should also be recognition that there are important wildlife sites that fall outside nationally protected areas and these should be conserved and enhanced in their own right. Protection of such sites should be given the status of 'material consideration' in planning development control processes.

There needs to be a step change in the speed and scale of ecosystem restoration and habitat creation by introducing mechanisms for positive planning, encompassing all aspects of land use and management.

The recent revocation of Regional Spatial Strategies (RSSs or Regional Plans) has left a large void in the national policy framework for guidance on natural resource planning. The RSS processes enabled the environment to achieve a more equitable balance with the other strands of sustainable development (economic and social). At the Local Development Framework (LDF) level, prior to RSS revocation, Planning Inspectors rejected sound environmental planning provisions during Examination-in-Public inquiries into local planning authority core strategies, on the grounds that they repeated provisions contained in the relevant RSS. Many sound environmental policies have therefore not been saved at the LDF level. This retrograde step needs to be rectified.

Local planning authorities should ensure that ecological networks are identified in planning policies and these should be based on accurate and up-to-date data. National government should support local authorities in this by promoting it's delivery as contributing to the Local Planning Authorities' duties in regard to S40 of the Natural Environment and Rural Communities Act 2006 (Biodiversity Duty) and Planning Policy Statement 9. The use of Section 106 planning contributions for ecological enhancement purposes in developments over a threshold size, or where the development impacts negatively onto biodiversity should be reinforced as a standard requirement.

Additionally the status of Planning Policy Statements needs reinforcing. At present they are only guidance and Local Planning Authorities can ignore them without legal sanction, although to do so exposes a decision to judicial review.

There is a further imbalance that the planning appeals system only challenges refusals, not consents.

Landscape Scale Delivery and Ecosystem Services Approach

In order to effectively face the current pressures on our natural environment we need to work at a landscape scale. This approach includes the protection and buffering of nature conservation sites with the creation of an agricultural landscape delivering both for the landowners and for biodiversity and a landscape that is permeable to biodiversity.

We need policy support for landscape scale biodiversity projects, with a full embedding of the ecosystem services provision throughout all government departments.

Local Biodiversity Partnerships

Though many agencies are currently planning and delivering landscape scale projects, the on the ground delivery is often localised. There need to be systems that enable local groups to make decisions re biodiversity delivery, but with a mechanism in place that co-ordinates these local actions to ensure that they meet the aims of the landscape scale project and to enable them to work together sustainably.

The mechanism is already in place for this – Local Biodiversity Partnerships (LBAPs). LBAPs need secure long term funding to enable them to undertake this role which is central to the current government’s vision for localised delivery while ensuring the connection to landscape scale project planning.

Local Environmental Records Centres

There are a multitude of species recording groups, conservation organisations and other bodies out there surveying and monitoring the wildlife of our natural world. The role and placing of local Environmental Records Centres (ERCs) is crucial to providing local support to these groups and people, supporting them in their management of data and surveying of sites. Data collated locally and managed locally is vital to the support of the Biodiversity Partnerships works and partner organisations works in conserving the natural environment and linking in with the evidence base for the selection of wider landscape areas.

Through the network of local ERCs, local authorities, other local public bodies, local conservation organisations and national organisations are able to gain access to up to date environmental data on wildlife, a requirement of local authorities to using in making decisions on planning applications and in having regard to as part of their functions, as stated in PPS9 and NERC Act 2006 section 40. In order for this local support and data provision to continue there needs to be support, financial and legislative, to the continuation and

development of local ERCs. There is a legislative requirement to ensure authorities use up to date biodiversity data.

In order to continue this invaluable role Environmental Records Centres need secure long term funding.

Valuation of the Natural Environment

We need to add a financial value to biodiversity and to the ecosystem services that it provides. The absence of any such mechanism means that criteria, such as Benefit Cost Criteria, used in major development evaluations carry a disproportionate weight in government decision making.

There has been a great deal of work carried out to address this issue (eg The Economics of Ecosystems and Biodiversity TEEB) and this needs to become a mainstream aspect of accounting practices and be communicated to all sectors.

We should include robust and comprehensive biodiversity and ecosystems services valuation methods in all relevant regulatory assessments.

We also need to promote the Strategic Environmental Assessment (SEA) approach to decision making

Education

We need to raise biodiversity up the agenda in schools and colleges. This should include both the international threats to biodiversity and also local biodiversity issues. Local organisations such as Wildlife Trusts have a key role to play in this. More small scale project pump priming funding to voluntary organisations could achieve significant multiplier effects in this regard.

Communications

Foremost we need to ensure this new way of thinking/valuing the natural environment is put across to the public. We need a complete shift in the way we perceive the environment, away from it only being important for birds and butterflies, to help people understand the role it plays in everyday life. If we succeed in this 'paradigm' shift, embedding the true value of our natural resources into decision making should follow naturally. However until this is achieved, policies and documents need to take account of the services and imbed them into working practices.

We need to create a role of educating the general public about what they can do to help themselves and why it is important for them to do it. People will only decide to do something if they can see the benefit of individual action and self responsibility.

Question 2

Have we identified the right overarching challenges for the White Paper to consider?

- a. If not, what should we focus on?**
- b. How should we approach these challenges?**

Key Recommendations

Decline in biodiversity and habitat fragmentation should be viewed as the key issues in their own right and should be approached through:

1. A wholesale review of agricultural practices which addresses the agricultural industries reliance on petro-chemicals.
2. A review of the existing national policy framework to ensure that decisions taken by different bodies, affecting the natural environment are no longer fragmented but are part of a coordinated national strategy for land management.

Detailed Comments

Decline in biodiversity

Decline in biodiversity including the number of species, their population levels and their viability is a key challenge and should be highlighted in a much more overt way as the key challenge here.

The following challenges have impact on biodiversity

1. National Policy
2. Agriculture
3. Development and Population
4. Climate Change
5. Fragmentation of habitats
6. Education and Communication

National Policy

There needs to be a fundamental overhaul over how decisions affecting land use and management are taken and implemented. There needs to be a new statutory national spatial and strategic framework to drive integrated decisions about land use and land management.

Within England, one of the overarching challenges faced by organisations and partnerships, when trying to work at a landscape-scale and across ecosystems is that they work amidst an extensive array of policies and mechanisms that each determines how land is used and managed. These

include agriculture, planning, woodland and forestry and wildlife protection. Few of these were designed specifically with nature in mind and virtually none allow for its restoration. The existing policy framework is fragmented and decisions are taken by a range of different bodies in isolation from each other.

Modern Agricultural Systems

Society as a whole is still heavily reliant on oil. Agriculture is one, of many sectors, reliant on petrochemicals through direct fuel consumption and also in the manufacturing and distribution of materials such as fertilisers and pesticides used in the agricultural business. Our dependence on oil, particularly within agriculture and relating to food security is not sustainable, oil supply has peaked and is in decline.

In recent years there has been a move towards the propagation of crops as a source of fuel. Such crops need to be managed as a long term resource (eg sustainable management of native coppice woodlands) and not grown for short term commercial gain (eg Miscanthus or short term willow coppice). These crops do not create any wildlife habitat, and a crop grown for fuel, planted as a monoculture and treated with pesticides is as poor for biodiversity as is a monoculture food crop. To actually be sustainable the growing of fuel crops need to be seen as a long term strategy, not as short term gain, and government should offer incentives to landowners to encourage them towards the former.

The intensification of agriculture is the major cause of the continued decline in our biodiversity and outside of stewardship schemes current agricultural methods are largely hostile to its recovery. This needs to be addressed by greater financial incentives being given to offset income forgone e.g. by increasing the resources given to HLS. These resources can be gained from ELS which delivers comparatively little in terms of ecological gain. HLS should be retargeted at purely ecologically beneficial measures.

Development and Population

The level of population in England and the levels of associated development, including housing, provision of work and the associated infrastructure is having a detrimental impact on biodiversity.

Greater powers should be given to local authorities to secure ecological gain from development, e.g. a minimum of 50% of new development over a certain size should be required to be strategic green infrastructure. Green Infrastructure should never mean gardens and be designed to benefit nature conservation and people's enjoyment of it.

Climate Change

We do not know how climate change will impact on biodiversity.

However, outside of the current biodiversity community, all climate change mitigation work is being considered in terms of its impact on ourselves. The impact of climate change on biodiversity needs to be made a core consideration of climate change policy.

In order to do this we need to embed landscape scale working into policy, and designate sites on the basis that they are likely to develop important biodiversity in the future, providing appropriate resources for their long term management.

Habitat Fragmentation

All of these are key issues which have led to the fragmentation of biodiversity sites, habitats and species. This is such a key issue that its impacts should be looked at as a separate threat to biodiversity.

Education and awareness

We need to teach biodiversity conservation in schools and colleges. We need subsidised training and/or rewards for students in relevant subjects eg ecologists / geographers etc

The biodiversity community and government need to create urgent, clear drivers in order to change attitudes for the better.

The potential role voluntary environmental groups can play in this is significantly underestimated. More small scale project pump priming funding to voluntary organisations could achieve significant multiplier effects in this regard.

Question 3

What are the existing policies and practices aimed at protecting England's natural assets (including but not limited to those set out above on our biodiversity, seas, water bodies, air and soil) that currently work most effectively?

- a. What works less well – what could we stop doing or do differently?**

Key Recommendations

1. Landscape scale biodiversity projects, with a full embedding of the ecosystem services provision throughout all government departments, through a new statutory national spatial and strategic framework and through Local Planning Systems.
2. Any new systems of compensation and mitigation through Biodiversity Offsets must create real gain for biodiversity through appropriate delivery with long term management in place.
3. The roles of Local Environmental Records Centres and Local Biodiversity Partnerships should be fully recognised throughout these processes.

Detailed Comments

Consistent Interpretation of Legislation

The mechanisms that do exist are not necessarily aligned geographically or strategically, the policy framework is fragmented and can give rise to conflicting priorities. There is no overall strategic or spatial framework within which all these decisions can sit and, as a result, many decisions are taken in isolation, through different administrative mechanisms.

There needs to be a new statutory national spatial and strategic framework to drive integrated decisions about land use and land management.

New powers and duties need to be placed on government departments, agencies and authorities to promote ecological security and ensure ecosystem health. This would help align decision making both geographically and strategically.

Generally, the advantages of working with natural processes are only just beginning to be recognised and are not well integrated into the policy framework. Maintaining natural processes is a cost effective way of retaining and enhancing ecosystem services but currently, unsustainable practices and unsustainable uses of, for example water and peat, continues.

Planning Policy

Local Planning Authorities should designate ecological networks (based on the landscape scale delivery networks identified by Local Biodiversity Action Plans) within their planning policies.

National government should support local authorities in this, by promoting it as a requirement under PPS9, and as good practice in deliver of S40 of the Natural Environment and Rural Communities Act 2006 (the Biodiversity Duty).

The development of Local Planning Documents (LDFs or their replacements) provides an excellent opportunity to ensure biodiversity is fully represented in local planning policies.

Securing protection for even the most heavily protected sites, for instance those within the Natura 2000 network, is not straightforward within the current system.

Statutory protection status should be awarded for all sites designated for nature conservation – in particular Local Wildlife Sites.

Protected species legislation should be amended with a stronger focus on securing populations and their habitats rather than on individual animals. Resources should be targeted on habitat creation or restoration rather than on surveys, exclusion and translocation strategies which are often inappropriate, high cost, ineffective and which, by impeding development make wildlife a problem rather than an asset. Measures for protection should assume occurrence of protected species where suitable habitats and conditions exist on a development site. Replacement habitats must however be in place and functioning before development starts.

Local Planning Authorities should be encouraged to adopt schema for building biodiversity into development (e.g. Green Points system). However the ecological criteria in some existing schemes (e.g. BREEAM) are ineffectual and should be overhauled.

Environmental impacts need to be fully addressed through mandatory Environmental Impact Assessment for all large scale strategic planning applications, including for major developments due for consideration through Hybrid Bill processes

Within planning there are many hooks for biodiversity enhancement in England. However, significant gains are rarely, if ever, achieved and numerous different interests have to be balanced. When compared against more human interest issues such as health and affordable housing, biodiversity improvements rarely achieve prominence.

Biodiversity is also often seen as a constraint to development and planning rather than a positive component of an area which should be enhanced. When conducting assessments (eg SA, SEA and EIA) there is currently no requirement for the outcome to be a positive gain for biodiversity. It is possible for a development plan to be approved despite the Sustainability Appraisal concluding it will be detrimental to biodiversity.

There should be a statutory requirement for all new development over a threshold size to include a minimum 50% of total area as Green Infrastructure provision to account for biodiversity impacts through mitigation and enhancement.

The current government has stated the aim to set up a system of land banking to deliver for biodiversity through the planning system. In order for this to deliver biodiversity gains on the ground, it is essential that the following issues are addressed;

- Compensatory land must be managed in perpetuity, with secure funding and mechanisms for its management. (The production of and delivery of, management plans should be a planning obligation).
- compensation delivered must be appropriately local to where the impact occurs
- replacement needs to reflect broadly like for like replacement
- compensatory land must be provided in at least 2:1 in terms of area, or greater depending on difficulties of recreation / extent of impact.
- compensatory habitat needs to be established and be of an appropriate quality in advance of land lost to development
- compensation agreements must involve the creation and management of new habitat – not simply the funding of management of existing habitat

The injunction to locate 60% of new development on previously developed (“brownfield”) sites should be reviewed in recognition of their often high biodiversity value in comparison to intensive farmland.

There needs to be stronger statutory controls for the regulation of development – for example by strengthening the statutory remit of local authorities to audit and enforce planning permissions. Resources must be made available to Local Planning Authorities to enable them to do this.

In many local authorities there is little or no specialist ecological expertise. There should be a requirement to strengthen the professional ecology knowledge and resource within Local Authorities.

There should also be statutory requirements to use up to date environmental data available through the network of Environmental Records Centres at the local scale.

Landscape Scale Delivery

Management of individual nature conservation sites has led to them becoming isolated, and species with specific habitat needs have suffered through isolation of populations. In the meantime the surrounding land has become less permeable to biodiversity through the impacts of development, agricultural intensification and disturbance.

In order to effectively face the current pressures on our natural environment we need to work at a landscape scale. This approach includes the protection and buffering of nature conservation sites with the creation of an agricultural landscape delivering both for the landowners and for biodiversity and a landscape that is permeable to biodiversity.

This approach will include the identification of landscape scale project areas for biodiversity, which are a spatial representation of the Biodiversity Action Plan. One example is the Biodiversity Opportunity Areas identified by the Local Biodiversity Partnerships in the South East and co-ordinated into the South East Biodiversity Strategy by the South East Biodiversity Forum). Other mechanisms which will help deliver landscape scale projects include land acquisition by nature conservation bodies (through initiatives such as the Wildlife Trust’s Living Landscapes and RSPB’s Futurescapes), delivery of environmental stewardship targets that really benefit biodiversity, action by local organisations which delivers the aims of the landscape scale project, and the designation of ecological networks within local planning documents (as stated in PPS9).

One way of delivering for biodiversity is the funding of land acquisition by nature conservation bodies. The sole purpose of these bodies is to improve the natural environment. This way is, however cost-heavy and not always appropriate. It also cannot remove the need for much better integration of biodiversity with other land-uses across the landscape as a whole, through schemes such as Environmental Stewardship, though payments for biodiversity gain do not necessarily sit easily with intensive food production.

There needs to be clarity in the naming of these landscape scale areas. At the moment the areas in the South East Biodiversity Strategy (and most of the SE LBAPs) are called Biodiversity Opportunity Areas, while in at least one county they are Conservation Target Areas. The England Biodiversity Strategy has identified Integrated Biodiversity Delivery Areas which operate at a larger scale and in “Making Space for Nature. A review of England’s Wildlife Sites and Ecological Network”, Professor Lawton recommends the identification of Ecological Restoration Zones. This is on top of individual organisations having different names such as Living Landscapes and Futurescapes which are their campaigns which are attempting to deliver similar overall aims.

Water Management and Flood Control

An integrated approach to policies and their implementation is lacking. For inland waters, a catchment-based management approach is essential and the Water Framework Directive (WFD), with the requirement of good ecological status of all water bodies by 2015 and a holistic focus on habitat management, water quality and quantity, has the *potential* to deliver a catchment-based and integrated approach to freshwater and coastal management in the UK, with significant habitat restoration.

However, to date, we have failed to grasp the opportunities presented by WFD. Targets set out in current River Basin Management Plans (RBMP), which will deliver WFD in England and Wales, are unambitious and delivery mechanisms as yet unclear. This process has the potential to provide a unifying framework for freshwater policies and policy delivery, but a stronger delivery agency is required to achieve this.

Particular issues in terms of biodiversity are;

- Non-native invasive species such as Giant Hogweed, Himalayan Balsam and Mink are having serious impacts on freshwater ecosystems but existing policies do not address this issue adequately
- The restoration of natural processes in river catchments for the support of biodiversity will support climate change mitigation and adaptation through ‘soft’ flood alleviation services
- Water abstraction levels on chalk streams. England contains a significant percentage of the world’s chalk streams. This valuable habitat is currently being significantly degraded through high levels of water abstraction

Agri-Environment /Forestry Schemes

Cross compliance provides a mechanism for creating connectivity but there are no incentives for locating corridors in the most effective places. This is partly because there is currently no link between the systems for highlighting areas for biodiversity enhancement in land use plans and areas targeted for agri-environment support through the Higher Level Stewardship (HLS) scheme. HLS needs to help buffer sites and establish ecological networks.

HLS could also be made more effective through the simplification of the process and with the inclusion of delivery mechanisms for the wider Green Infrastructure agenda.

HLS scoring is also not based on direct benefits to the water environment including for flood management work. To ensure an integrated approach, agri-environment planning and targeting should be made on a catchment basis.

CAP resources should fund sustainable land management that safeguards our natural environment, not just our wildlife but also the ecosystem services that land provides, such as clean water, carbon storage and flood alleviation.

Entry Level Stewardship also needs to be improved to deliver key options for biodiversity and delivering ecological networks.

Protection of the remaining woodland is relatively good and the cases of ancient woodland being lost are now rare. There has also been a general increase in woodland area across the UK. However, conservation and enhancement of sites and the buffering and expansion of new woodland has been less successful. In this area, for example, many woods are managed just as game preserves and their lack of buffer or transition zones is very obvious.

The economic driver for sustainable woodland management is still weak despite an increase in the use of wood fuel. This results in biodiversity loss through a lack of traditional woodland management. Incentives are required to make appropriately located native wood-fuel more viable.

Economic Approaches for Land Management

The Government should promote economic approaches that will favour conservation management (such as the grazing of conservation sites and BAP habitats using suitable breeds) by stimulating creation of new markets and payment for ecosystem services.

Delivery Mechanisms

We need to strengthen the network of partners delivering biodiversity gains and protection – i.e. through the Local Biodiversity Partnerships and the Local and National Biodiversity Action Plan process.

We also need to strengthen the network of local Environmental Records Centres, building capacity to help mobilise more recording on the ground that contributes to the identification of important biodiversity areas.

Overall we must build on existing processes rather than scrap and start again.

This requires the continuation of long term funding for Local Biodiversity Partnerships and Environmental Records Centres.

A range of more appropriate biodiversity indicators for local authorities should be developed.

Question 4

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

- a. How should we define success?**
- b. How can we agree on common goals and assess our progress towards them?**

Key Recommendations

1. Landscape scale biodiversity projects, with a full embedding of the ecosystem services provision throughout all government departments, through a new statutory national spatial and strategic framework and through Local Planning Systems.
2. Any new systems of compensation and mitigation through Biodiversity Offsets must create real gain for biodiversity through appropriate delivery with long term management in place.
3. The roles of Local Environmental Records Centres and Local Biodiversity Partnerships should be fully recognised throughout these processes.

Detailed Comments

National Policy

There needs to be a greater level of coordination and integration between, for example, agri-environment schemes, planning policies and River Catchment Management Plans. Then indicators such as water quality, area of greenspace, creation of habitats, key indicator species populations could be used.

Government should provide the framework for this through national policies and support local authorities in this role by promoting as Natural Environment and Rural Communities Act 2006 Biodiversity Duty and PPS9 delivery.

Planning System

Green Infrastructure is now moving up the planning agenda although the loss of regional Green Infrastructure policies consequent upon the revocation of the Regional Spatial Strategies represents a major setback.

There is danger of relaxing planning to move on development quickly. Only big schemes get Environmental Impact Assessments and there is incremental change through small developments.

All planning applications should include Section 106 agreements as a levy to improve green infrastructure and biodiversity provision and these should involve local groups in the development and management of the site.

There is currently inconsistent use of Section 106 by different planning authorities and this needs to be made consistent.

The planning system should provide greater protection to sites, especially Local Wildlife Sites.

Landscape Scale Delivery

Delivery must come through landscape scale projects. Different indicators within Ecological Recovery Zones should be agreed by sub-national partnerships and local partnerships.

Biodiversity Action Plan

Delivery needs to be focused more on scientific evidence and there needs to be more funding into this. Local biodiversity partnerships may be able to help with the targeting and delivery of this research.

Delivery needs to be at a landscape scale. Projects should be identified locally but demonstrably fit into the landscape delivery area.

The key mechanism for measuring success is the local BAP feeding up into the England Biodiversity Strategy. At a local level the coordination needs to be carried out by the Local Biodiversity Partnership,

Environmental Stewardship

Environmental Stewardship needs to be reviewed to ensure that it is delivering. We need to ensure that the financial benefits to farmers are more attractive resulting in more effective long term gains. Are the current levels of funding adequate as compensation is not good enough? There need to be greater financial incentives to demonstrate increase biodiversity.

We need to ensure we are promoting a strong message of the benefits of these existing mechanisms.

Stewardship grants need to be targeted at biodiversity gain (priority species and habitats), providing funding of creation and restoration, creating ecological corridors and networks and supporting increases in population of target species.

Voluntary Organisations

Recording groups need to supply data to local Environmental/Biological Records Centres to underpin decision making in the planning system.

Government needs to provide greater support to civil organisations (including local volunteer groups) to deliver the Big Society agenda they will need more support, resources and active members. There is also the need for project leaders to direct voluntary activity into the more essential and productive areas and for centres of excellence to which voluntary bodies can refer for expert help and guidance.

This Government support will need to include training, possibly to be delivered through Local Authorities or through larger charities such as the Wildlife Trusts. The Big Society cannot be delivered without significant support from government and Local Authorities.

Locally people should be able to define what they want. Ways of measuring this will then be created. These should include social and economic indicators to give biodiversity communication to the wider public.

Education

We need to alter the national curriculum to include biodiversity, taught using locally relevant examples.

Question 6

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?

Key Recommendations

1. Landscape scale delivery is the key to enhancing and protecting our natural environment
2. A wholesale review of agricultural practices which addresses the agricultural industries reliance on petro-chemicals and the impacts of intensive agriculture on biodiversity.
3. The roles of Local Environmental Records Centres and Local Biodiversity Partnerships should be fully recognised throughout these processes.

Detailed Comments

Landscape Scale Delivery

Landscape scale delivery is the key to enhancing and protecting our natural environment. It depends on a number of mechanisms such as environmental stewardship, statutory protection of designated sites and the identification of ecological networks by local planning authorities.

A further approach which is working very well is the acquisition of land by NGOs with sole purpose of conserving biodiversity. The Upper Ray Biodiversity Opportunity Area is within a landscape scale project being delivered by Berks Bucks and Oxon Wildlife Trust (BBOWT) and RSPB. It supports, and is supported by the work of two LBAP partnerships – Buckinghamshire and Oxfordshire.

In the last three years BBOWT have successfully fund-raised for, and purchased two farms which contain extensive areas of BAP Priority habitat. This action not only protects this land in perpetuity but also strengthens their case for working with neighbouring land owners and supporting their HLS applications.

This project not only delivers for biodiversity per se, it also restores the natural processes in the river catchment to support climate change mitigation and adaptation.

Though many agencies are currently planning and delivering landscape scale projects, the on the ground delivery is often localised. There need to be systems that enable local groups to make decisions re biodiversity delivery,

but with a mechanism in place that co-ordinates these local actions to ensure that they meet the aims of the landscape scale project and to enable them to work together sustainably.

The mechanism is already in place for this – Local Biodiversity Partnerships (LBAPs). LBAPs need secure long term funding to enable them to undertake this role which is central to the current government’s vision for localised delivery while ensuring the connection to landscape scale project planning.

Green Infrastructure Planning

Several Regional Plans introduced the concept of green infrastructure planning at ‘every spatial scale’ – i.e. from the cross-regional boundary scale down to the local community level. This was a sound philosophy for the holistic protection and enhancement of the natural environment.

Partnerships

Area based independent partnerships (ie. outside local government) can deliver benefits both for biodiversity and the wider Green Infrastructure agenda. Such partnerships include Community Forests such as the Marston Vale Community Forest.

Specifically for biodiversity, Local Biodiversity Partnerships have a vital role to play in helping to galvanise local action and creating the linkage between local action, landscape scale delivery and national policy

Local Environmental Records Centres are also vital in bringing together local environmental data and contributing towards the conservation work of the other local biodiversity partnership organisations. Also in encouraging and mobilising recording effort to ensure species and habitat data is kept up to date and therefore conservation effort can be targeted appropriately.

Planning Process

We need to ensure the delivery of strategic biodiversity gain is built into major development sites.

For example through working with the developers Aylesbury Vale District Council (in partnership with other members of the Biodiversity Partnership) was able to ensure large scale biodiversity gains for the proposed Aylesbury East Growth Area. These gains included the creation of species rich grasslands, scrapes for wetland birds, significant areas of open space managed for biodiversity and neighbouring farmland being entered into HLS for wetland and farmland birds.

We need to free-up the planning obligations regime, to ensure that

- Compensatory land must be managed in perpetuity, with secure funding and mechanisms for its management. (The production of and delivery of, management plans should be a planning obligation).
- compensation delivered must be appropriately local to where the impact occurs
- replacement needs to reflect broadly like for like replacement
- compensatory land must be provided in at least 2:1 in terms of area, or greater depending on difficulties of recreation / extent of impact.
- compensatory habitat needs to be established and be of an appropriate quality in advance of land lost to development
- compensation agreements must involve the creation and management of new habitat – not simply the funding of management of existing habitat

If biodiversity offsets are the system selected by the Government then they need to be developed with rigorously tested pilot schemes first to ensure that they are fit for purpose and not leading to a loss in biodiversity

Agriculture

We need a wholesale review of farming methods.

Society as a whole is still heavily reliant on oil. Agriculture is one, of many sectors, reliant on petrochemicals through direct fuel consumption and also in the manufacturing and distribution of materials such as fertilisers and pesticides used in the agricultural business. Our dependence on oil, particularly within agriculture and relating to food security is not sustainable; oil supply has peaked and is in decline.

In recent years there has been a move towards the propagation of crops as a source of fuel. Such crops need to be managed as a long term resource (eg sustainable management of native coppice woodlands) and not grown for short term commercial gain (eg Miscanthus or short term willow coppice). These crops do not create any wildlife habitat, and a crop grown for fuel, planted as a monoculture and treated with pesticides is as poor for biodiversity as is a monoculture food crop. To actually be sustainable the growing of fuel crops need to be seen as a long term strategy, not as short term gain, and government should offer incentives to landowners to encourage them towards the former.

The intensification of agriculture is the major cause of the continued decline in our biodiversity and outside of stewardship schemes current agricultural methods are largely hostile to its recovery. This needs to be addressed by greater financial incentives being given to offset income forgone e.g. by increasing the resources given to HLS. These resources can be gained from ELS which delivers comparatively little in terms of ecological gain. HLS should be retargeted at purely ecologically beneficial measures.

Even though environmental stewardship is delivering for biodiversity on private farmland and woodland, biodiversity is still being lost. Greater powers

are needed to ensure biodiversity is protected on private land, including compulsory access for ecological survey.

The management of soil is another key aspect. Soil degradation through intensive agricultural systems needs to be halted through national policies delivered at a local level.

Government should promote economic approaches that will favour conservation management by stimulating creation of new markets and payment for ecosystem services

Education

We need to raise biodiversity up the agenda in schools and colleges. This should include both the international threats to biodiversity and also local biodiversity issues. Local organisations such as Wildlife Trusts have a key role to play in this. Volunteer led projects, such as the school wildlife areas and vegetable gardens created by Chiltern Society volunteers and Forest Schools, could be expanded if more pump priming funding were available.

Question 7

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?

Key Recommendations

1. There needs to be a promotional scheme which inspires local people to become engaged in local biodiversity projects and which is based on existing Transition Town and Fair Trade Town models.
2. We need to raise biodiversity up the agenda in schools and colleges. This should include both the international threats to biodiversity and also local biodiversity issues.
3. The identification of ecological networks through urban areas and biodiversity gains being implemented through local planning authorities' policies would provide reassurance to the general public that biodiversity is a priority for local authorities.

Detailed Comments

We need to make biodiversity integral to everything

Eco/Wildlife Town Scheme

There is a groundswell movement to identify towns and villages as those which are making a significant contribution to environmental aspirations. These include the Transition Town Movement, Fair Trade Towns, Britain in Bloom Awards, Walkers are Welcome Towns, Plastic Bag Free Towns etc.

There needs to be a promotional scheme which inspires local people to become engaged in local biodiversity projects and which is based on existing Transition Town and Fair Trade Town models. These could include existing Ecoschools, active involvement in local groups managing local sites and wildlife gardening. There would be an associated accreditation scheme.

This should interlink with similar climate change and food schemes, and to landscape scale ecological projects.

Education

We need to raise biodiversity up the agenda in schools and colleges. This should include both the international threats to biodiversity and also local biodiversity issues. Local organisations such as Wildlife Trusts have a key role to play in this.

Ecoschools has a small biodiversity component but this needs to be enhanced. Schools should be incentivised to create wildlife areas, food growing areas and support biodiversity throughout their grounds. Many organisations work nationally (Learning Through Landscapes, Wildlife Trusts) and locally (Chiltern Society) to support schools in this.

We need a big publicity campaign aimed not only at schools but also involving the general public including the promotion of public awareness raising initiatives. These could include simple surveys (eg RSPB's Big Garden Birdwatch among others) , local bio blitz surveys (bringing many different species recording groups and local communities together to survey under recorded sites or local areas, such as seen by the National BioBlitz Programme 2010 led by Bristol Natural History Consortium) and the measurement of their impact and public events.

For example, over 1000 visitors attended the Bucks' Wonderful Wildlife Event organised by the Bucks and Milton Keynes Biodiversity Partnership in May 2010 which involved 12 local organisations.

Specific messages need to be targeted to specific groups.

Publicity should promote local groups but be co-ordinated by local authorities.

Local Issues and Large Campaigns

Campaigns should use local issues and large campaigns as a focus to draw people in.

Such campaigns could be focused so that, if for example a local development were to take place, local people are involved in the biodiversity mitigation and compensation accrued from it, turning a negative local impact into a positive one.

Tying Food Production to Biodiversity

Supermarkets should be encouraged to develop campaigns that promote more sustainable farming practices which benefit biodiversity.

They should be pro-active in connecting consumers to biodiversity schemes – such as community orchards, farm visits, farms delivering for biodiversity, existing schemes such as bee conservation campaigns.

Supermarkets should have an obligation to make links where food comes from and to support local food producers.

We also need to develop a Grow Your Own – slow food campaign, involving local food, allotments and the role that biodiversity can play on these (pest control etc)

Balanced messages to media/ public eg climate change

The media have a vital role to play. Too much media coverage is scaremongering, sensationalist or negative only. We need to get balanced messages into media.

Self Responsibility campaign

A new campaign looking at self responsibility, highlighting what will happen if we don't act now and what is achievable if we do.

Partnerships

All of the above need a delivery framework and secure funding.

Though many agencies are currently planning and delivering landscape scale projects, the on the ground delivery is often localised. There need to be systems that enable local groups to make decisions re biodiversity delivery, but with a mechanism in place that co-ordinates these local actions to ensure that they meet the aims of the landscape scale project and to enable them to work together sustainably.

The mechanism is already in place for this – Local Biodiversity Partnerships (LBAPs). LBAPs need secure long term funding to enable them to undertake this role which is central to the current government's vision for localised delivery while ensuring the connection to landscape scale project planning.

Local Planning Delivery

Local people need to see how the systems such as the Local Development Framework are benefitting biodiversity. The identification of ecological networks through urban areas and biodiversity gains being implemented through local planning authorities' policies would provide this reassurance.

Question 8

What should be our vision for the role of Civil Society in managing and enhancing the natural environment and for engaging individuals, businesses and communities in setting the agenda for that work?

Key Recommendations

1. We need to raise biodiversity up the agenda in schools and colleges. This should include both the international threats to biodiversity and also local biodiversity issues.
2. There should be the provision of a funded scheme for nature conservation to run along similar lines and parallel to the HLS schemes. These schemes would provide a funded framework for biodiversity delivery beyond the farmed environment with scope for delivery of scheme actions through civil societies
3. There should be the provision of a well funded national scheme to increase volunteer activity and to support local volunteer organisations.

Detailed Comments

Education

There is a need for environmental and ecology education embedded into the school curriculum at an early age, where technical expertise is delivered by experts within the Civil Society.

Local Organisations

Parish Councils can act as a link between Civil Soc, local communities and government on a very local scale.

Local organisations and Parish Councils should develop stronger links to increase the Parish Councils' biodiversity knowledge and skill – especially in relation to delivery of local BAP targets and statutory duties such as the NERC Act.

Funded Biodiversity Scheme

There should be the provision of a funded scheme for nature conservation to run along similar lines and parallel to the HLS schemes. These schemes would provide a funded framework for biodiversity delivery beyond the farmed environment with scope for delivery of scheme actions through civil societies.

Long term and sustained funding is required for delivery of these above actions by Civil Socs

Both Civil Society groups and local authorities can have a meaningful influence through a combination of technical expertise, managerial, technical delivery and regulatory roles.

The Government is required to provide a suitable framework within which civil societies (eg the Wildlife Trusts) are enabled to delivery of these roles – i.e. through funding and support.

It is strongly felt that statutory requirements and consistent target setting needs to remain with central government.

Encouraging Volunteering

There should be the provision of a well funded national scheme to increase volunteer activity and to support local volunteer organisations.

For example –

The universal requirement for the business community to engage with volunteering / provide time and opportunity for staff to take periods of leave for volunteering with civil soc organisations to help deliver environmental management and biodiversity gains.

There should be the formal recognition of volunteering based apprenticeships within government benefits systems.

Question 9

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

- a. How best can local Government and other local partners work together to improve local outcomes on the natural environment, and pursue a more integrated approach linking a natural healthy environment to economic prosperity, sustainable development and a better quality of life, health and wellbeing?**
- b. What are the most effective mechanisms for managing the natural environment where cross-boundary issues are involved, and making the link to other mechanisms for economic growth, transport and planning?**
- c. How best can the value of the natural environment be valued within planning?**

Key Recommendations

1. We need the promotion of local actions eg wildlife gardening, allotments, active membership of local organisations and demonstrate the part that this can play in connecting local communities and developing community spirit.
2. The environmental impact of businesses (at both a local and national / international scales) needs to be highlighted, though we need to get message across without hectoring or preaching
3. There should be a requirement to strengthen the professional ecology knowledge and resource within Local Authorities. All Local Authorities should have access to an ecologist.

Detailed Comments

a.

The major media providers need to work with the Government and the civil society to provide proactive messages on TV, radio, internet, papers and other media. In recent years television programmes such as Springwatch and Countryfile have started this process but much more can be done.

We need the promotion of local actions eg wildlife gardening, allotments, active membership of local organisations and demonstrate the part that this can play in connecting local communities and developing community spirit.

We need to significantly reinforce the messages that being outside plays a beneficial role in both physical and mental health. The additional benefits that a biodiverse outdoor space has need to be fully researched and promoted to the health and other sectors.

Local initiatives need to come from the bottom up, with the identification of a real need and the willingness of local communities to take responsibility, but be supported by civil societies, local authorities and statutory agencies, as and where appropriate. For example the Environment Agency are currently working with community groups in flood risk areas, enabling local people and riparian owners to take responsibility for keeping the waterways clear and reducing flood risk.

Effective Green Infrastructure planning and delivery could be key in achieving this aim. Given the current fiscal constraints, some local authorities are already focusing on the skill base that is essential for GI planning as a potential area for cost saving. Government action is necessary to counter this trend by reinforcing the priority of GI planning (particularly as the provisions that supported this in the statutory Regional Plans are no longer in force).

b.

Local Enterprise Partnerships (LEPs) are a new mechanism for delivering economic prosperity in a local area. LEPs need to fully integrate with Local Biodiversity Partnerships (and other local environmental partnerships) to ensure that their activities and policies do not have a detrimental impact on biodiversity and other local environmental issues.

Local Biodiversity Partnerships need to integrate of businesses into local BAP delivery. Where necessary, the environmental impact of businesses (at both a local and national / international scales) needs to be highlighted, though we need to get message across without hectoring or preaching. Messages however do need to address the issues head on – with no ‘greenwash’.

Government, Local Authorities, civil societies and Local Biodiversity Partnerships need to ensure that local open spaces may be taken for granted. They need to sell the wider ecosystem services to businesses, the health sector and local people.

Much public open space does not meet its biodiversity potential because of how it is designed and managed. The following measures are suggested:

- an approach to design which retains existing habitat features and networks wherever possible
- an approach which “builds in” biodiversity using the best available knowledge and seeks to realise the potential cost advantages of wildlife-friendly management
- an approach which maximises scope for community or volunteer engagement rather than presenting a “fait accompli”. Such features as community gardens or allotments are especially valuable with wider health and environmental benefits
- all new open space or landscaping to be provided with a management plan which would be binding on the adopting organisation (typically a local authority or trust)

- a satisfactory balance between sports field provision (which often has priority and produces landscapes poor in both biodiversity and amenity terms) and other uses.

There is a lack of public understanding of the beneficial effect of biodiversity in public open space. We need the importance of biodiversity to be taught in landscape architecture / design courses, the education of the general public, funding of management in public open spaces (provision of and delivery of management plans should be a planning obligation).

For cross boundary working – Local Biodiversity Partnerships are important mechanisms – especially where they are delivering in cross boundary landscape scale projects. Regional government provided the framework for this to happen within regions.

c.

Most Planning Officers have little knowledge of biodiversity. The basics of ecology and the importance of biodiversity need to be taught within planning qualifications.

Working with local Environmental Records Centres in providing up to date environmental information on wildlife should be strengthened, along with the development of tools to help direct planners to making well informed decisions. Such tools could include Planning Screening tools as being developed by Greenspace Information for Greater London (GiGL) with funding and support from Natural England. This should be coupled with the following.

There should be a requirement to strengthen the professional ecology knowledge and resource within Local Authorities. All Local Authorities should have access to an ecologist. They may be employed directly, employed via an SLA with another Local Authority or employed part-time within another related role.

The full value of biodiversity needs to be acknowledged within the planning system. This includes its social value, financial value, value from the supply of ecosystem services etc.

Overall each Local Planning Authority needs a clear Land Allocations Plan that identifies wildlife sites, corridors and networks and is supported by robust biodiversity policies.

There should be a requirement for all new development above a certain size to contain a minimum of 50% green infrastructure.

Question 10

How best could the economy reflect the true value of nature's services in the way business is done, to drive smarter, greener growth?

Key Recommendations

1. National government calculations of Gross Domestic Profit should include the cost of depletion of natural resources so that value and impacts on the natural environment are fully accounted for within the national budget for decision making.
2. There is a need for a clear, transparent and nationally agreed methodology for undertaking a cost / benefit analysis of impacts to the natural environment.

Detailed Comments

Realistic Valuation of Natural Environment

National government calculations of Gross Domestic Profit should include the cost of depletion of natural resources so that value and impacts on the natural environment are fully accounted for within the national budget for decision making.

There is a need for a clear, transparent and nationally agreed methodology for undertaking a cost / benefit analysis of impacts to the natural environment. i.e. the economic cost of mitigation required to adequately compensate for development impacts to be fully embedded within the development control decision making process.

We need to build on existing cost benefit analysis research work undertaken i.e. United Nations 'The Economics of Ecosystems and Biodiversity' report.

Greater scientific research is required to provide more accurate valuation of key aspects of our natural environment.

If one can place a value on the cost of a life for transport planning purposes, it should not be impossible to devise an acceptable mechanism for valuing the potential harm to the natural environment and social and cultural sustainability from proposed major developments.

Financial Incentives

There should be provision of tax credits and other financial incentives for rewarding good environmental practice beneficial to the natural environment.

Such schemes should learn from, the strength of the Climate Change Levy with strong incentives for action, and the Landfill Tax with good track record for geographically local benefits

Question 11

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

Key Recommendations

1. There should be statutory requirements for all corporate businesses to sign up to an Environmental Management System in line with government set targets.
2. There should be stronger statutory penalties and statutorily sanctioned enforcement measures for damaging practices

Detailed Comments

Environmental Management Systems

There should be statutory requirements for all corporate businesses to sign up to an Environmental Management System in line with government set targets.

The protection of the natural environment would be an essential element of the EMS. The EMS would fall within the companies Corporate Social Responsibility reporting requirements allowing rating of companies for their environmental practice scores.

Such scoring could be commensurate with the UK Kite Mark system / Green Dragon in Wales and would need to be nationally standard, statutorily regulated and audited.

There would also need to be the provision of financial incentives for continual improvement of environmental performance as reported through the above EMS / CSR reporting and rating systems.

Businesses should incorporate knowledge of their EMS /CSR requirements for environmental awareness and behaviour change activities within their core functions. For example the provision of leave / sabbaticals to enable staff to partake in civil society volunteering for the benefit of natural environment management. This requires a sympathetic HR / leave system.

Approval of major developments having a potential significant impact on the natural environment should be subject to the provision of an acceptable Environmental Management Case (equivalent to the Safety Case concept embedded in the regulatory regimes for most safety critical industries).

Enforcement

There should be stronger statutory penalties and statutorily sanctioned enforcement measures for damaging practices - underlining that the ‘polluter pays’ principle applies to the natural environment also.

Question 12

What are the barriers to joining up and seeking multiple benefits from our natural assets?

Key Recommendations

1. There is a gap between civil societies delivering local projects and the strategic landscape scale planning. This is only an issue if there is no mechanism to bridge that gap. There is currently a mechanism that does this – Local Biodiversity Partnerships. These partnerships must be given long term funding in order to effectively function.
2. In order to function successfully, landscape scale projects need to have a funded member of staff to co-ordinate the delivery. This may be a specific Project Officer post, it may be part of the remit of a Local Biodiversity Partnership Officer or it may be through the funding for input from an officer in a key partner organisation.
3. Local Authorities administrative boundaries are a barrier. Biodiversity and green infrastructure do not conform to LA boundaries. There needs to be a mechanism for Local Authorities to discuss cross boundary issues and create solutions.

Detailed Comments

Big Society Approach

The current emphasis on the “Big Society” approach will lead to the reinforcement of a current barrier. In order to truly achieve multiple benefits from our natural assets we need to think big – at a landscape scale. Groups working at a local level very often only see the benefits of their work at a local level and do not see the bigger picture – even though their work is making a beneficial contribution to it. Also, local organisations may not know the other civil organisations also playing their part. This could lead to duplication of effort, wasted resources and eventually alienation from the project.

In order to deliver multiple benefits for our natural assets at a landscape scale there needs to be a mechanism which creates a link between the bigger picture and the big society. Currently Local Biodiversity Partnerships and Green Infrastructure Partnerships / Consortia are well placed to undertake this role if resourced adequately. Their role is intrinsically supported by Local Environmental Records Centres.

Political Issues

Local Authorities administrative boundaries are a barrier. Biodiversity and green infrastructure do not conform to LA boundaries. There needs to be a

mechanism for Local Authorities to discuss cross boundary issues and create solutions.

The cross-boundary Supplementary Planning Guidance concept provided a practical model for achieving this. Policy C7 (River Thames Corridor) of the South East Plan was designed to encourage and facilitate effective cross-boundary working on a landscape scale within a single sensitive natural entity that fell within a multiplicity of local planning areas.

Government policies and priorities frequently change, for instance (though certainly not restricted to) when a new Government comes into power. The processes of the natural environment work at a far longer timescale than political processes – especially as there is often a political desire to see instant results.

The support and input of statutory agencies such as Natural England, Environment Agency and Forestry Commission should mitigate against this, however the loss of expertise in the current re-shaping of the natural environment will have a serious negative impact.

Resources

Thinking big requires resources, money and time. Projects with large scale aims tend to founder if suitable resources are not allocated to them (eg North West Green Arc).

In order to function successfully, landscape scale projects need to have a funded member of staff to co-ordinate the delivery. This may be a specific Project Officer post, it may be part of the remit of a Local Biodiversity Partnership Officer or it may be through the funding for input from an officer in a key partner organisation.

There are also competing needs for finite land and resources. Biodiversity and other aspects of green infrastructure are often seen as being of lower importance than other uses such as food production and development. They are also often rated lower than some recreational uses whereas diverse habitats make some of the best, cheapest and healthiest recreational land.

Funding for biodiversity gain needs to be long term. If funding is given for three years only, biodiversity gains on the ground may not be evident and further work is required. Any funding streams for biodiversity have to be longer term.

Partnerships

All over the country there are great examples of valuable work being undertaken by existing partnerships such as Local Biodiversity Partnerships,

Green Infrastructure Consortia/Partnerships, local Environmental Records Centres and independent partnerships such as Community Forests. There is a danger that this work may be undone by a simple localism agenda. A mechanism for the co-ordination of local projects so that they contribute to a wider agenda is critical.

Even within partnerships, single interest groups may always plough their own furrow. However it is important that they are aware of the bigger picture and of the work of other groups around them, work which may be compatible or counterproductive to theirs.

The natural environment sector also needs to understand that gains for biodiversity are not necessarily gains for others eg farmers

Communication

The Biodiversity and Green Infrastructure sectors are guilty of talking in their own language and jargon. This language often alienates the general public and is also a barrier to other sectors which they need to engage with (eg economists – who also talk in their own language).

Additionally we need to understand that the natural environment means different things and has different values to different people.

Planning Policy

Each local planning authority needs an ecologist in place in order to ensure the strategic and holistic assessment of the natural environment in the planning system.

Question 13

What are the barriers to thinking big and taking a landscape scale approach to managing our natural assets?

Key Recommendations

1. There is a gap between civil societies delivering local projects and the strategic landscape scale planning. This is only an issue if there is no mechanism to bridge that gap. There is currently a mechanism that does this – Local Biodiversity Partnerships. These partnerships must be given long term funding in order to effectively function.
2. In order to function successfully, landscape scale projects need to have a funded member of staff to co-ordinate the delivery. This may be a specific Project Officer post, it may be part of the remit of a Local Biodiversity Partnership Officer or it may be through the funding for input from an officer in a key partner organisation.
3. Landscape scale delivery for the natural environment needs to be built into policy and supported by all political parties to ensure that political discontinuities do not disrupt the process and undo valuable achievements.

Detailed Comments

Big Society Approach

The current emphasis on the “Big Society” approach will lead to the reinforcement of a current barrier. In order to truly achieve multiple benefits from our natural assets we need to think big – at a landscape scale. Groups working at a local level very often only see the benefits of their work at a local level and do not see the bigger picture – even though their work is making a beneficial contribution to it. Also, local organisations may not know the other civil organisations also playing their part. This could lead to duplication of effort, wasted resources and eventually alienation from the project.

In order to deliver multiple benefits for our natural assets at a landscape scale there needs to be a mechanism which creates a link between the bigger picture and the big society. Currently Local Biodiversity Partnerships and Green Infrastructure Partnerships / Consortia are able to undertake this role.

Realistically these landscape scale areas need to be identified at a level larger than county but smaller than national, so that detailed local knowledge can meaningfully be fed into the process. The identification of Biodiversity Opportunity Areas in the South East Biodiversity Strategy is a best practice example. The data used for the BOAs selection was standardised but used

local organisations' knowledge and the resulting map and policies work at a scale over administrative boundaries.

Political Issues

There is often a political (and community) desire to see a quick fix. Landscape scale delivery and much biodiversity gain takes place over a much longer timescale. Though a field can be planted with native trees or sown with wildflower seeds and the impact be visible immediately, it will not become a fully functioning part of the local ecosystem until a much longer timeframe has elapsed.

Landscape scale delivery for the natural environment needs to be built into policy and supported by all political parties to ensure that political discontinuities do not disrupt the process and undo valuable achievements.

Delivery can also be opportunistic

Local Authorities administrative boundaries are a barrier. Biodiversity and green infrastructure do not conform to LA boundaries. There needs to be a mechanism for Local Authorities to discuss cross boundary issues and create solutions.

Section 40 of the Natural Environment and Rural Communities Act 2006 needs strengthening to ensure that Local Authorities and public bodies undertake their statutory requirements under this act with regards to biodiversity and Biodiversity Action Plan delivery.

Resources

Thinking big requires resources, money and time. Projects with large scale aims tend to founder if suitable resources are not allocated to them (eg North West Green Arc).

In order to function successfully, landscape scale projects need to have a funded member of staff to co-ordinate the delivery. This may be a specific Project Officer post, it may be part of the remit of a Local Biodiversity Partnership Officer or it may be through the funding for input from an officer in a key partner organisation.

Funding for biodiversity gain needs to be long term. If funding is given for three years only, biodiversity gains on the ground may not be evident and further work is required. Any funding streams for biodiversity have to be longer term.

Partnerships

Landscape scale projects need to be delivered through partnership working.

All over the country there are great examples of valuable work being undertaken by existing partnerships such as Local Biodiversity Partnerships, Green Infrastructure Consortia/Partnerships, local Environmental Records Centres and independent partnerships such as Community Forests. There is a danger that this work may be undone by a simple localism agenda. A mechanism for the co-ordination of local projects so that they contribute to a wider agenda is critical. This should alleviate the belief within local organisations that landscape scale delivery is a top down approach.

In urban areas there is the potential for a single independent organisation to work with local people and manage their open spaces. eg The Parks Trust in Milton Keynes.

Communication

Messages about landscape scale work need to be very clear. Landowners within landscape scale project areas may not know this or have an affinity with the rest of the area.

Planning System

The planning system only accounts for statutory duties. There are statutory duties to protect designated sites, BAP habitats, ancient woodlands and protected species. Within PPS9 there is a duty to identify areas where habitat restoration and creation should take place. However there is no duty on Local Planning Authorities to ensure that this is delivered. This needs to be addressed.

Each local planning authority needs an ecologist in place in order to ensure the strategic and holistic assessment of the natural environment in the planning system.

Land Ownership

Working at a landscape scale means working with multiple land owners. There are several barriers associated with this.

- Accessing contact details is time consuming
- Though letters, public meetings etc are good communications tools, face to face meetings are the most effective way of working and these are highly time consuming
- Gains may be made working with one landowner but if the neighbouring landowners are not interested then the landscape approach is only resulting a new isolated biodiversity areas

Agri-Environment Schemes

There is currently no incentive for farmers to link landholding to create ecological networks through stewardship and no link between the systems for highlighting areas for biodiversity enhancement in land use plans and areas targeted for agri-environment support through the Higher Level Stewardship (HLS) scheme. HLS needs to help buffer sites and establish ecological networks.

Question 15

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

The solution to reversing the losses of biodiversity that we have suffered in England is through landscape scale delivery and the ecosystem services approach.

However this requires strategic level thinking which does not always sit comfortably with the current localism agenda. Local organisations can deliver great gains for biodiversity and the natural environment but in order to maximise their efforts there needs to be a mechanism for linking and co-ordinating local actions with strategic level delivery.

This mechanism already exists – it is Local Biodiversity Partnerships and these partnerships need to be given long term funding to enable local actions to systematically contribute to landscape scale delivery for the natural environment.