

Environmental Audit Committee

Oral evidence: Revised Environmental Improvement Plan, HC 1622

Wednesday 21 January 2026

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Members present: Mr Toby Perkins (Chair); Jonathan Davies; Carla Denyer; Chris Hinchliff; Sojan Joseph; Manuela Perteghella; Martin Rhodes; Dr Roz Savage; Blake Stephenson; John Whitby; Sammy Wilson.

Questions 1-24

Witnesses

[I](#): Ruth Chambers OBE, Senior Fellow, Green Alliance; Richard Benwell, Chief Executive, Wildlife and Countryside Link; and Livi Elsmore, Senior Campaign Manager, Healthy Air Coalition.

Examination of witnesses

Witnesses: Ruth Chambers, Richard Benwell and Livi Elsmore.

Q1 Chair: Welcome, everybody, to the latest meeting of the Environmental Audit Committee. I am very pleased to be doing a session on the revised environmental improvement plan. To help us we have our first panel, which has two EAC old hands and one EAC virgin. You are all equally welcome. Will you please introduce yourselves and your organisations?

Richard Benwell: Good afternoon, folks. I am Richard Benwell, chief executive of Wildlife and Countryside Link.

Ruth Chambers: Hi, everyone. I am Ruth Chambers, senior fellow at Green Alliance.

Livi Elsmore: I am Livi Elsmore, the senior campaign manager for the Healthy Air Coalition.

Q2 Chair: Excellent. Thank you very much indeed. Ruth, how do you feel the new EIP compares to the previous iteration that it has replaced? To what extent do you think it puts us on track? As we know, the OEP has already said that as a country we are off track. Does the plan address some of those failings?

Ruth Chambers: We welcome the fact that EIP25 was published and that it was EIP25 and not EIP26, as could have been the case in some circumstances. It is certainly an improvement on its predecessor. It is clearer. The actions and the commitments have numbers. There are 13 delivery plans that set out how the Government intend to deliver the legally binding Environment Act targets. As a whole, it feels more coherent. There is a lot to welcome about its structure.

I think what really matters and what the Committee will be more interested in is what it says. There are some very welcome changes and improvements in the direction of travel. I will pull out one, for example, on chemicals, where the Government seem to be wanting to move towards a position of greater alignment with EU REACH, the gold standard. That will increase protection for the environment and human health, and save the public purse millions.

In other cases, though, EIP25 appears to have stood still a little bit. To give you a couple of examples, in the marine environment an important date for when we are going to achieve good ecological status seems to have disappeared. In fact, it has probably gone backwards. In some cases other commitments have been rolled forward. Another example is the perennial commitment to legislate to end the sale of horticultural peat products when parliamentary time allows. EIP25 could have taken the opportunity to provide a tighter timescale; it did not. I note that only yesterday the Scottish Agriculture Minister wrote to Emma Reynolds to encourage her to get on with bringing legislation forward on that.



The plan is silent in other important areas. I will give another example that I know will be of interest to the Committee because it has championed this over the years. That is the long-lost measure to try to remove products of illegal deforestation from UK supply chains. There is no mention really, apart from a very generic reference.

In some cases, the plan seems to have gone a little bit backwards on pesticides. I will stop there. There is a lot to welcome, there are some areas that have stood still, and in some cases we have gone a little bit backwards.

Q3 Chair: Richard, what is your perspective on EIP in comparison to its predecessor, and the extent to which it puts the UK back on track?

Richard Benwell: When the last EIP was published, we said it fell short in three ways: in its structure—our ability to tell whether it would actually help us to meet our statutory and non-statutory targets; in its ability to corral all of Government behind those objectives, as in its cross-departmental approach; and the ambition and delivery of the actual content. In that structural sense, we agree with Ruth that it is a much better plan for our ability to say who will do which actions and by when—although there is still more to do to determine whether it stacks up—and in its ability to rally cross-Government action, where you can see in the wording of the plan much better interdepartmental attribution of effort, which is good. However, it is worth noting now that that is not always matched by the rhetoric and the actions that are coming from Departments themselves, particularly in that awful juxtaposition of the Prime Minister standing up as the plan was launched to say that environmental regulations were fundamentally misguided.

It is in the substance of the plan itself that I think the Committee will want to dig most deeply. I am worried that the ambition of the actions in the plan is not yet anywhere near enough to help us to get back on track to meeting our environmental targets. You have already noted that the OEP said we are off track for 21 out of 43 targets, and on track for only five of them. We have recently had more biodiversity indicators that are showing an intractable downward trend, especially for specialist species. To turn things around is really hard. It is really hard. This plan feels, frankly, like a status quo plan. It feels like a plan that in the past we might have welcomed from Government for doing some good things, but not yet the uplift in effort that is needed to actually get there.

It is not game over. One of the features of the plan that is worth pointing out is that it spawns more plans, and the Government still have a chance to fix that if they act quickly and decisively in those areas. To quickly point out a few, first of all, farming has to do the heavy lifting on this. We are still awaiting the farming road map and details of the next stages of environmental land management, as well as regulatory improvements. We note that the target for farming is weaker than the previous iteration of the EIP. It goes from a target that set an ambition for 65% of farms to have 10% to 15% of their area farmed for nature. Now the ambition is to



double the number of farms, with around 7% of the land managed for nature. That is not good enough by the science, but we still do not know whether the farming road map can get us further than that. That is area number one.

Area number two is land use change. We know that our protected sites have been malingering, with only about a third of them in good condition, for a long time. We are miles off the 30by30 commitment. We are waiting on the land use framework and the 30by30 plan. Will they be able to influence planning and land allocation decisions to get us there?

On water, there are huge efforts needed to sort not just sewage pollution but also farm nutrient pollution and chemical pollution. The stuff in the water White Paper yesterday was quite good on some of those structural issues for the water industry itself, on asset management, but there was nothing on wildlife, river restoration and chemicals reduction, and nothing really on setting things like catchment limits on pollution. There again we are waiting on further plans, and there are more you could go through, including the nature investment plan and more.

Q4 Chair: I will pause it there because I am worried you will run out of things to say. It is probably unlikely to be a problem, but it is important that we hear from other people, too.

Livi, how do you feel the EIP compares to its predecessor on air quality? Two years ago we had an OEP report that said air quality was one of the few areas where we are performing pretty well. Last year's report suggested there had been significant backward steps. We saw in this year's OEP report more positive news on air quality, which the Committee will be looking at shortly. From your perspective, how does this compare to its predecessor on air quality? Do you feel it puts in place the steps that are needed?

Livi Elsmore: Thank you, Chair, and thanks for giving me the opportunity to speak to you all today. Of course, I am sure you will go into some of this in more detail in your full inquiry into air pollution, which we are very excited about.

On air quality you can see that there is more of a focus in this EIP on deliverability, but there is partial progress. The OEP is picking up on some of that progress in the Government's long-term air-quality targets. If we are specifically talking about targets, we, as the Healthy Air Coalition, have welcomed the shift that came in this EIP from the Government to move forward the long-term interim target on PM_{2.5}—the fine particulate matter that people are breathing in—from 2040 to 2030. That is definitely a welcome step, but we are clear that while that looks like some progress, it needs to be a stepping stone to introduce better targets. I think the OEP also said in its latest assessment that reporting on air quality is currently done against outdated standards that do not reflect the current evidence base.



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We now know that air pollution is harmful to human health in very low concentrations, and if we are talking about something like nitrogen dioxide or ammonia, there are also much wider implications for the environment and nature. This is looking at the targets in the Environment Act in particular, where the Government are making some progress, and again we welcome that move of 10 years. However, we need to be looking towards the future to new air-quality targets that will bring us into line with the latest guidance that we have available, which is the World Health Organisation guidelines.

Maybe it is worth picking up on a couple of specific points in the 2025 EIP where there is a bit of a difference from the previous one, particularly on domestic burning. It is important to flag that because it is such an important issue. It is now the second biggest source of fine particulate matter pollution in England, and it has been growing exponentially in the last 20 years. We know that only 8% of people who use a wood-burning stove or who burn another form of solid fuel in their homes need to do so—as in, it is their only form of heating.

As we are producing so much pollution from this source, the clean air movement would expect to see measures in the EIP that meet the scale of the challenge. Unfortunately, the only thing in this EIP on domestic burning is a commitment to publishing a consultation on further measures on wood burning. Of course, we look forward to seeing that, but a consultation alone, unless it is backed up by a real commitment from Government to bring forward measures that will turn the dial on wood burning and the air-pollution emissions from it, is really not going to be enough. We have some concerns, too, about the scope of the consultation. If the Government are keen to take action on this source of air pollution, they need to be looking at ultimately phasing it out over time, with health warnings and reforms to smoke-control areas in between.

There are a few changes as well in how the Government are looking to communicate air quality to the public. There is a sense in this EIP that they have started to grapple with the fact that public awareness of the health harms of air pollution is quite low. We know from a survey that the Royal College of Physicians did in November with YouGov that about a third of people do not realise that there is any correlation between their health and air pollution. It is clear the Government need to do more on this, but again we are not really sure that the measures set out in the EIP will be enough to shift the dial.

Q5 **Chair:** You have alluded to some areas where you would like to see the targets extended. Do you think that this EIP moves the Government in the right direction for achieving the existing targets, while accepting you think there should be other ones?

Livi Elsmore: It is a mixed bag. We are not entirely convinced that the measures set out in the EIP will be enough to help England meet its targets on air pollution. If we think about something beyond just PM_{2.5},



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while the PM_{2.5} target has been shifted forwards 10 years, aligned with the progress that is going on in the European Union, we are not seeing anything like that with nitrogen dioxide. We are stuck with the same limit values as we had in 2010. Frankly, we are not meeting those. At the moment we are consistently seeing breaches across the country. On current projections, these will extend past 2030. I believe that current projections are for us to meet our legal limits of nitrogen dioxide by 2045. There is a number of measures set out in the EIP, but we are looking at quite advanced progress that needs to be made to reach that nitrogen target.

It would probably be remiss for me not to mention ammonia, because unfortunately we are currently very far off getting to grips with our ammonia targets. We have an ammonia reduction commitment to meet by 2030. That is way off mark. Although there are slightly different commitments in this EIP to the previous EIP, many of them revolve around voluntary programmes of work with agriculture. They do not represent a dedicated and detailed plan that would be needed. Ammonia has been flatlining, unfortunately, for decades now, and we are not convinced that the measures that have been set out in the EIP will be enough at this stage.

Q6 Chair: Ruth, we said previously that while this is positive progress there are, none the less, a number of areas—the majority of areas—where the Government remain off track. We will see whether the measures that have taken place since that reporting period, and indeed the EIP, start to make a difference. Which steps in the EIP do you think most significantly move the Government forwards and where do you think the biggest holes remain?

Ruth Chambers: It is difficult to answer that, Chair, because we are still waiting for so many parts of the puzzle to appear. While we see the EIP as the mothership of Government delivery, it does not exist in a vacuum.

To answer that question fully, we really need to see the land use framework, as Richard has articulated, because the EIP talks about the “what” for Government delivery of the environmental progress, whereas the land use framework will hopefully tell us something about the “where”. Until we have those answers and until we have the certainty from the 25-year farming road map about the existing environmental land management schemes, it is difficult to know exactly how that delivery will work in practice.

The EIP is a plan to deliver the environmental targets and the other goals. The targets are not as we would like them. The targets are not as Parliament wanted them when they were set in the first place, but in 2027 to 2028, which is not that far away, there will be a statutory review of those targets, so there will be a chance to look at how they could be improved and uplifted.

Q7 Chair: We heard a moment ago about the mixed messaging that has



come from Government. We were disappointed on this Committee that we did not get an overall parliamentary statement at the time that the OEP report came out or, indeed, with the EIP. What message do you think that sends about the extent to which this is a priority for the Government?

Ruth Chambers: I think it sends an unfortunate message because leadership comes from the top. I was thinking about this in relation to you, Chair, and your leadership of this Committee.

Chair: Oh gosh!

Ruth Chambers: Imagine how the Committee would feel if you missed a key, probably the most key, parliamentary hearing of the year and rather than just being absent or unwell, you were standing on a parallel platform doing something that actively undermined the work of your Committee. How would everyone feel about that? That would not feel like leadership to me. Clearly, you are not about to do that, but that is the impression the Prime Minister gave, no doubt accidentally. His predecessors put a lot more effort into launching EIP23 and the 25-year environment plan, publishing forewords to them. When Theresa May was Prime Minister she launched the 25-year environment plan in Barnes. She said on more than one occasion afterwards that of everything that she did in her prime ministerial career, launching that plan was one of her proudest moments. I do not think we see the same level of pride or enthusiasm yet from this Administration. But as Richard said, it is not too late.

The lack of a statement on the Floor of this House on either EIP25 or the OEP's annual progress report is very disappointing. It seems a long time to wait for the debate on the annual climate and nature statement that one of the Members managed to succeed in persuading the Government to do. There was a debate in the House of Lords secured by the Cross-Bench peer Lord Krebs, but this feels like crumbs off the master's table rather than the substantive and forensic scrutiny and debate that these issues should merit. Having said that, today's hearings are obviously very welcome.

Q8

Chair: Richard, you alluded to the importance of farming being part of this. Our second panel will be studying in detail the issue of agricultural performance—of course, with the support of Government—and how it is working. You have already alluded to some of the things you need to see from Government; do we need to ask more of the farming sector, or do you think it is a case of this being a ball that lands purely in the political sphere?

Richard Benwell: We do need to ask more of the farming sector, but we also need to recognise that they need help to do what we are asking them to do. We are asking farmers to be the spearhead of nature recovery. No other sector can do that. Yet what we see at the moment from farming reform is a reform that still sees farming as a "just keep it



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going” industry. It sees farming as something that may make marginal changes. Maybe we will pay farmers to cover the costs of what we are asking them to do.

When we passed the Climate Change Act, the Government brought in a massive programme of reform to invest tens of billions of pounds in changing the energy sector. This is our equivalent for nature. If we want to help farmers—who, let’s face it, are in all sorts of trouble and beleaguered from every corner—to turn things around, we have to recognise that the current levels of investment are not enough. We need to be rewarding the farmers who go furthest and fastest.

What we see in the environmental improvement plan is a target that does not come near enough to what the scientific evidence tells us is needed to halt the decline of nature. We see a focus on current levels of investment to provide incentives, and there is still a huge question of improving the regulatory baseline and enforcement so that the rules that underpin farming are properly adhered to. We are in a shocking state where half of farms inspected did not have compliant slurry storage, for example, and that is a combination of the lack of investment that we have faced and the lack of enforcement and monitoring we have seen in the farmed environment.

What I want is for the Government to see farming as an industry of progress, one of change, one of spearheading something new, like we did with the renewables sector 10 years ago, rather than something to keep ticking over. I hope that is the message you will hear from colleagues later.

Q9 Jonathan Davies: When the revised environmental improvement plan was published in December, many stakeholders and people invested in these issues welcomed it warmly. However, there were some questions around delivery and implementation, and I think we have touched on some of those points. Ruth, to what extent do you share those concerns? How can they be addressed?

Ruth Chambers: The plan is the plan now, isn’t it? EIP25 is here to stay. It is not going to change until the next time the EIP is reviewed. Those 13 delivery plans are there for us all to peruse, interrogate and scrutinise. They are not perfect, and they lack quantification, but one of the benefits of those plans is that they are not part of the main EIP. That is a bit of a double-edged sword because it means they can be changed more easily without scrutiny, perhaps, but on the other side, which I think is a bigger benefit on balance, it will allow the Government to adapt them and to make them more agile and action focused, depending on what happens in the course of the year. The fact that we have the delivery plans and they can be updated is helpful.

However, there are some significant gaps in those delivery plans. I will bring us back to marine very briefly. It is not my specialist area, but having read quite widely for this evidence session and talked to



stakeholders from the marine community, they are worried that the delivery plans are not going to turn the dial on what is needed to address the severe issues facing the marine environment. For example, the review of the marine protected area network, which was launched back in January, I am told will not be ready now until the end of 2028.

The Office for Environmental Protection did not have time to do a substantive review of EIP25 because it was only published about five weeks before its progress report was out—an unfortunate timing issue. It has published a briefing note on EIP25, which hopefully is in your pack today. Again, I direct you to some of its comments on the delivery plans and their frailties. For example, on species targets, which are critical, because those targets are coming up fast—they are 2030 targets—the OEP finds the delivery plan to be quite circular, because it points to other interim targets and other plans. What we cannot really come away with from EIP25 is a plan for a plan; it must be a plan for action.

Q10 Jonathan Davies: On that, how well integrated do you think it is with other bits of Government strategy? We have the 25-year farming review and things around land use, and lots of different aspects. Do you feel this tessellates with those other strategies?

Ruth Chambers: Ask us in six months and we would very much like to say the answer is yes because, of course, those other Government strategies and plans are not public yet. I think the first thing the Government need to do is to get them out the door, because until they exist we cannot view them as the coherent package that they need to be. Sometimes, and I think this is perhaps true in all parts of Government but especially in DEFRA, there is a big queue of things waiting to come out. We have the land use framework, the circular economy growth plan, the 25-year farming road map, the PFAS action plan. They are all important. What we cannot have is a further delay in getting those out the door, so they need to cohere and work together in a complementary way. Until we see them, we cannot comment on whether or not they will.

Q11 Jonathan Davies: Richard, to what extent do you share the concerns of the OEP regarding the delivery and implementation of the strategy?

Richard Benwell: It is all about delivery. We can play spot the difference between 2023 and 2025 plans all day, but the real difference we are looking for is just getting stuff done. If there is one message, as I hope you can tell, that I want to leave you with today, it is that we cannot afford to be in the same old situation where a plan begets a plan begets a plan, we all wrap ourselves in comfort—“There is another plan coming. It will be okay”—and suddenly the Parliament has passed. Some Departments are getting out there and making actual decisions that will affect the real world, and what I want to see from DEFRA is, when it comes to this next series of reviews, such as the PFAS action plan, let’s ban the PFAS family; on the review of permitting, let’s permit intensive agriculture and sludge; on the promised review of nationally significant infrastructure and biodiversity net gain, let’s get an ambitious programme



going soon. It is those things that will make the difference. There is such a backlog of them.

I have one more, because I do not want to let today pass without talking about access to nature. That is another example where we have the promise of a plan that has been waiting for ages. We see some headline-grabbing stuff like the river walks, which are good, but we also want to see new access routes opened. We want to see enhancements of biodiversity along those routes. There is so much that requires actual decision making and at the moment we are in a merry-go-round of consultations and plans.

Q12 Jonathan Davies: I think we have some good stuff coming forward in that space, and you are right to highlight the river walks. If you have any influence, please lean in and say the Derwent valley needs a report. That would be fantastic.

Perhaps I could hear from you, Livi, about your thoughts on delivery and whether you share some of the concerns identified by the OEP about the delivery plans, and how they might be addressed.

Livi Elsmore: Yes, I am happy to. I echo the words of the other speakers on this being about delivery. There are some things that are unclear in the plan and there is so much that is about cross-Government working as well. I suppose that is something the OEP has picked up on before. With an issue like air quality, there is a tendency for it to get caught between different Departments and different departmental briefs. Obviously, we have an issue that is fundamentally a health issue. As a coalition, we talk about this often as a public health issue, but it is such an important environmental issue. It is a DEFRA-led issue but many of the policy levers are in different Departments. I think that if we can get it right on air pollution, we can probably get it right on a whole host of environmental issues. At the moment, the cross-Government working is not really of the nature and strength that enables us to do these things.

Q13 Jonathan Davies: Leaning into your area of expertise, air quality, and the complicated web of different Government Departments that are involved in moving the dial on that issue, the OEP questions whether in some areas of the revised EIP there were the necessary targets to measure progress, provide transparency and allow scrutiny. Do you share that assessment and, if so, which aspect of it do you worry about the most?

Livi Elsmore: You can tell me whether this is what you are looking for or not—I do not want this to be a cop-out answer—but we have these targets and they are in place. Of course, we can argue about whether they are exactly the right targets that we need to push the dial environmentally and to get to where we need to be on the harms to human health. The challenge is that often a Department like DEFRA is in charge of this project, and it is going up against Departments that have



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huge multi-year infrastructure projects to balance them in between. You do wonder where the accountability frameworks are.

I will say specifically that this is not something that the OEP has picked up, but we were informed recently that the Government's joint air quality unit will be disbanded in March and the nitrogen dioxide programme, which was set up to reduce nitrogen dioxide levels at particular points for legal levels around the country, will be removed from the Government's major project portfolio when that happens. The joint air quality unit was set up to facilitate cross-Government working on the nitrogen dioxide programme, which happens between DEFRA and the Department for Transport, but it also touches policy commitments across other Departments. It really is one of the only mechanisms we have across Government to make sure that that cross-Government working is functioning as it should do. We would question whether now, or March, particularly given we have this new EIP, it is the time to be doing this.

Furthermore, if we had been consulted on this, the clean air movement might have told the Government that perhaps the joint air quality unit could have been refocused into something that helps bring the EIP targets to life and makes the change in environmental action plans happen, rather than just being disbanded and having to go back to dealing with individual Departments singularly.

Q14 Jonathan Davies: I think that will be useful for our work on air quality, which is an upcoming Committee inquiry.

Ruth, you talked quite specifically about some of the targets and measures to provide transparency and allow scrutiny. You talked about the marine aspect, for example. Is there anything that you would like to add to inform the Committee in respect of whether the EIP has the necessary targets to measure progress, provide transparency and allow scrutiny?

Ruth Chambers: The one thing I will add is that the EIP delivery plans relate to the legally binding targets and the Environment Act. There are 13 delivery plans covering those areas. We can talk about whether or not they could be improved, and in our view they could, but they are a good starting point.

However, all the other goals in the environmental improvement plan do not have delivery plans attached to them, and they cover very significant areas, including everything within the resources field apart from municipal waste, chemicals, access to nature. I think this is the question. I am not suggesting that the plan has become a two-tier plan, but I think there is a risk of that if we are not careful.

Q15 Jonathan Davies: Richard, I suspect from listening to you that you share the view of the OEP that there are questions over whether the revised EIP has the necessary targets to measure progress, provide transparency and allow scrutiny. Do you perhaps want to be specific



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about which areas the Government should look at to focus on for providing that transparency, accountability and scrutiny?

Richard Benwell: Yes. The plan is a step forward on the OEP's ability to say whether the individual measures stack up to delivering the targets, but there is still a way to go on that. At the moment it is quite qualitative. The Government set out things like a "high" contribution to meeting water-quality targets rather than precisely how much nutrient pollution it is expected to reduce. There is a scientific job to do there.

There is a question of ground-truthing that we are worried about. One of the differences between this plan and the last is that the commitment to inspect SSSIs has been pushed back and turned from an interim target into an ambition. Similarly for the marine protected area network, the programme of monitoring of features is in terrible disarray. We are not going to have any clue whether things are in good condition or not through Government statistics by the time we get to the 2030 target. There is a real problem of being able to tell what is going on.

One of the good things in this version of the plan is the boost in the amount of priority habitat outside the protected area network that the Government are promising. They have upped it from 140,000 hectares to 250,000 hectares by 2030, which is excellent. However, what I want to know is: will the Secretary of State be able to come before you in a year's time and explain how many of those have been delivered so far? If not, what levers can she pull to increase it? Also, by the way, ideally, how many hectares of priority habitat have been lost as a result of, for example, changes to planning policies? That would be a good question to ask the Secretary of State when she comes, so that you can see the effect it is having in the real world. Will she be able to come and tell you how many hectares are done by next year?

Chair: She will certainly get the chance.

Q16 Dr Roz Savage: Thank you all for coming in today. Richard, thank you for all your sage guidance on the Climate and Nature Bill. Ruth, thank you very much for your kind remarks about the annual climate and nature statement. Livi, apologies but my questions are directed to the other two panellists, so you can relax for a while.

Richard, the OEP has pointed to a potential lack of the necessary resources to deliver on the commitments made in the revised EIP. If you agree with that assessment, what do you see as the key pinch points?

Richard Benwell: There are numerous pinch points, but to point to two, it is worth saying that we still think the farming budget is not enough to do what it needs to do. I know that DEFRA fought tooth and nail to protect the farming budget, and hopefully more than ever before will go on nature-friendly measures, but the science suggests it is still, UK-wide, probably only half of what it needs to be to help us meet our targets. That public investment is something that we would like to see pushed forward, as we would like to see public investment pushed forward in



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things like supporting skills. I know you will hear about that from the next panel.

The other clear bit of evidence of a resourcing pinch point is the private sector investment needed to restore nature. I think three or four years ago, the Green Finance Institute came up with a figure of a £3 billion or £4 billion a year annual shortfall in investment to meet the targets. We are several years on now, so presumably that has only gone up. That was recognised by the Bank of England and by DEFRA. At the moment not only are the drivers to push that investment forward not present—we think the Government should be looking to regulate to make more polluter pays compliance requirements on key polluting sectors to help fill that gap—but we are also seeing some policy changes in Government causing private market uncertainty that is shaking the few areas of investment that we have.

Of particular note are things like the consultation on biodiversity net gain that prompted questions of exemptions. In the end, the Government went for an exemption of 0.2 hectares for small sites, which was not as bad as it might have been, but just the question prompted a chilling effect in the market that has seen landowners not willing to put their land into solutions for biodiversity net gain and has shaken market investment.

There are more consultations coming. Those will have that same risk. We hope, though, that when it comes to the next round of decisions, the Government go the opposite way, realise that they have this billions-of-pounds shortfall, and when they decide what to do on major infrastructure they head towards an ambitious settlement where the biggest infrastructure projects are paying more for biodiversity recovery. On the normal biodiversity net gain, we hope in particular that now that they have exempted the smallest sites they also close some of the loopholes, like the de minimis exception that is being claimed far too often to be justified at the moment, to help get those private markets going. If they do those two things—boost public investment in farming and create demand drivers for private investment—you will start to see that resource gap close.

Q17 Dr Roz Savage: Thanks very much, Richard. Ruth, can I come to you with that same question about resource pinch points?

Ruth Chambers: Thank you for the question. It is important, because no matter how good the plan is, if the resources aren't there it is not going to be achieved.

First, I echo Richard's point on the farming budget. Green Alliance's research estimates that to meet our binding climate and nature targets, half of the farming budget should be spent on the sustainable farming incentive and the other half spent on higher tier and landscape recovery. In that light, when we see the commitment, welcome though it is, to landscape recovery of £50 million, which is about 2% of the budget, we



can start to understand that it is not yet at the scale that it needs to be. We would like to see a new round of landscape recovery come forward in 2026.

The second point is on water. We are all still digesting the water White Paper, aren't we? It only came out yesterday, but a really important element of it will be the delivery and implementation of better regional planning for water to try to boost nature recovery. I have read that stakeholders in the water space have called what the Government are offering, which is a doubling of funding, a damp squib—excuse the pun. Looking at that will be important in the context of the EIP.

The third area I draw to the Committee's attention is what one might call the institutional funding. DEFRA is being forced, through the spending review efficiency plans, to reduce its headcount by 5%. Natural England has had quite a major voluntary exit programme in place this year. I understand that lots of experienced staff members have left through that, so I would be interested in seeing some analysis about what impact those structural and institutional changes might have on the delivery of the EIP.

Q18 Dr Roz Savage: Thank you very much. I feel that you have more or less answered the next question, so with the Chair's permission I will skip that one and move on. The housing and sustainability report that we produced highlighted key gaps in the green workforce, especially ecologists. How much of a problem do you think that will be in delivering on this EIP?

Richard Benwell: It is one of the biggest pinch points that is slowing down the Government's aspirations for growth, rather than environmental regulations. That is the first point to make: they have been pointing towards the wrong target. On our ability to administer environmental improvement, it is critical to have expert advisers on the ground who can help farmers to engage in some of those higher-tier, high-value schemes that Ruth mentioned and having ecologists who can help development applications build in nature from the start so you avoid those costly and time-consuming delays later.

At the moment, too many local authority decisions are going the wrong way because of lack of good advice and lack of resource to help people through the system. We hope that there will be a change. There have been some improvements with things like the Environment Agency's ability to do inspections, but in other areas, like Natural England's ability to administer the new nature restoration fund, there remain serious gaps to be filled.

Ruth Chambers: This is not a new issue, is it? It is a long-running issue. In preparing for this evidence session, I reminded myself that back in October 2021 this Committee published a report on green jobs. That recommended that DEFRA's skills gap plan covered all areas of the 25-year environment plan, which was the predecessor but one of EIP25, with an action plan to address those skills shortages. I have had a look and I



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cannot find that Government plan, so that is perhaps one thing to reflect on.

As you said, the Committee's findings amplified by industry. The Home Builders Federation did a survey last year that found that nearly 40% of councils do not have access to ecological expertise—not just an ecologist in-house but access to ecological expertise. As Richard said, that can affect and put at risk the quality and the timeliness of decision making. Local government also manages many nature protection sites, which would merit the need for that to be addressed.

It seems that skills is now in the purview of Skills England in a generic sense. In November it published an assessment of priority skills to 2030, which got me quite excited because I thought if it is doing it to that horizon, given that coincides with many environmental targets, there is bound to be something about green skills and nature skills in there. Again, I could not find anything. That to me suggests there is a gap. EIP25 is not silent on this matter. Commitment 5 and commitment 54 talk about green skills and skills in the forestry sector, but they are very generic. They are not very detailed. It feels like the Government perhaps need to come back and explain how they will address the skills gaps that you and others have identified.

Q19 Manuela Perteghella: My first question is for Ruth and Richard. Ruth, you mentioned how the EIP does not exist in a vacuum; I wonder whether we can go into more depth on that. How important is alignment between the revised EIP and other current and forthcoming policies such as the land use framework? We will go with Richard first.

Richard Benwell: Alignment towards the objectives is key. That does not mean just cross-referencing plans and mentioning the EIP in places. It means making sure that when other Departments make decisions, they have in mind whether those decisions will contribute or detract from delivery of the Environment Act targets.

The ones that we have in mind at the moment are things like Ruth mentioned, such as the positive steps the Government are taking on chemicals alignment. It will be good when the SPS agreement hopefully aligns us on pesticides and we get closer to the EU there. At the same time, you have the Health and Safety Executive consulting on new deregulatory chemicals plans that would allow the Government to follow other jurisdictions in chemical approvals that will potentially send us off in completely the opposite direction, exposing the UK public to more harmful toxic chemicals.

In other areas the same is true. Think, for example, of the planning reforms, where things that seem like simple steps to reduce red tape are in fact reducing environmental protection. Biodiversity net gain changes will make a fractional, tiny difference for housing development plans, but they could potentially undermine one of the most important markets we have for nature, and it does not seem to be factoring into decision



making. It is that alignment that we need to see, and it is particularly that alignment in the growth and regulation area. It seems like the Government have fallen into the classic trap of considering regulation as nothing but a barrier to investment and growth and have forgotten that regulation is there to protect the environment and human health. It is there that we would like to see alignment.

Just to mention quickly the piece of work that DEFRA published yesterday around national security and the environment, which was startling. It said very clearly that nature is the foundation of our national security and that every critical ecosystem is heading towards collapse. It says as starkly as you can imagine how that will impact our food supply, our health and our national security. Then there is a little box in there that lists what Governments should do to fix it. It says they should do 30by30—protect at least 30% of land and sea for nature. They should reduce pesticide pollution and they should get rid of perverse financial incentives and support nature. On none of those things are we taking the domestic action to actually meet the objectives.

This is where policy alignment really matters. If we believe those things, it has to be built in as a national security priority, building economic resilience. If we really believe these things, it has to be built in as a health priority so we are benefiting from the health and wellbeing benefits that nature can bring, as well as making sure that we do not detract from the core biodiversity priorities when we do things like land use planning change.

Manuela Perteghella: Ruth, would you like to add anything?

Ruth Chambers: Yes, a couple of things. The first, as we have alluded to, is that to tell a coherent story the plans need to exist within the same timeframe. They must come out quickly. Ideally, we must get that full package by Easter so we can see them all within the same breath.

There are a couple of things that they must also do, though, to make sure that they are part of that coherent story. A significant benefit the land use framework could bring to the DEFRA delivery is to ensure that habitat creation is targeted at the areas where farms find it difficult to make a profit from food production and where the productivity of land is lowest, with agri-environment spending then guided to those areas, starting to spatially direct what the EIP is saying the Government want to deliver.

On the circular economy growth plan, we understand that there will be sector road maps coming out from that. They need to move beyond recycling for a start, and the circular economy growth plan could also set a long-term goal to bring resource use within planetary boundaries. Those are the things that could make sure that the plans are all coherent but also edge the ambition further forward.



The only other part of alignment I want to mention is that we have political alignment in our narrative and our rhetoric. It does not matter which Government Minister is standing up and talking about the environment and its relationship to growth; we should get the same message and the same level of assurance. If you look at the detail and how EIP25 describes the relationship between nature and growth, it is really good, and that should be essential reading for everyone in the Government.

Q20 Manuela Perteghella: My next question is about delivering the EIP. To what extent, Richard and Ruth—and I will come to Livi in a little while—do you think there is the necessary join-up between Departments to deliver the revised EIP? Are there any specific gaps between Departments and across Government?

Ruth Chambers: Again, I am glad that you have asked about this, because without effective cross-Government delivery this will end up being DEFRA's plan, delivered in part and falling down in many other parts. There are three things I would like to say. The first is—this will be relevant for when you have DEFRA Ministers before the Committee—that there is a cross-governmental delivery board, which is chaired by the DEFRA director general for environment. In fact, that board exists only because of previous scrutiny by this Committee and colleagues that found that—no surprise—cross-Government delivery was not as it should be. The terms of reference for that group have been requested. They have not been published so there is not much transparency there. I will leave that with you to consider.

Secondly, as Richard said, yesterday the national security assessment of global ecosystem risk and biodiversity loss—it is a mouthful but it is essential reading—came out. It makes for stark reading. How and where are Government picking up the discussion on how they will address those systemic risks? Most of them are not risks for the environment; they are risks for other parts of our lives. The obvious place is around the Cabinet table. I reminded myself how many Cabinet committees there are and there are 12. The Environment Secretary sits on two of those 12 committees. I had a quick look at the terms of reference, and I cannot see within any of them where there is a space or place to talk about those systemic risks in the way that we all know is merited.

Finally, I know that the five environmental principles embedded in the Environment Act are dear to this Committee's heart. They underpin cross-Government working on the environment. The good news is that they have made it into some cross-Government processes. However, in some cases commitments to embed them are, shall we say, rather delayed. In June 2020, the Treasury first promised to put those principles in the Green Book. We are still waiting for that to happen. In November, DEFRA published its initial review of how well those principles were informing policymaking, and it found there were examples of good practice across Government, but it also found that there is low awareness



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of those principles among senior officials and other Government Ministers outside DEFRA. Again, there is work to be done on that.

Q21 Manuela Perteghella: Livi, do you have any concerns about any cross-Government gaps in delivery on air quality?

Livi Elsmore: Yes. It is that question again about cross-governmental gaps, and I gave the example earlier of the joint air quality unit in the Government being disbanded. The challenge is that air quality is an issue that crosses so many different government briefs.

If we are looking at an issue that I am sure the Committee will be keen to explore in its full inquiry into air pollution, on something like indoor air pollution—which is not mentioned in the EIP, partly because it is a health and environmental issue—understanding has been building over time and it is of a slightly different nature and dimension to outdoor ambient air quality. As was picked up by the chief medical officer, Chris Whitty, in his 2022 annual report on air quality, there is currently not any clarity on where indoor air quality fits between Government Departments. We do not have an official lead Department or a ministerial portfolio that it fits into. That is another example of how something like air pollution, which is so important to so many different parts of the Government's work, and so important to the 10-year health plan, can fall down the cracks of three different Government briefs. I am happy to give a bit more information, so please feel free to follow up if I have missed anything.

Q22 Manuela Perteghella: Do you all think DEFRA has the required levers to oversee the delivery in its overseeing role for the delivery of the revised EIP? Do you think it will be able to oversee the delivery? Does it need anything else, or any help?

Livi Elsmore: I can particularly speak for air pollution, but it is a challenge because most of the levers to policy change sit outside the Department for Environment, Food and Rural Affairs. That will always be a challenge.

Richard Benwell: DEFRA will be a responsible leader for each of the targets and will be looking to the delivery plans and making sure that it is working across Whitehall. What DEFRA really needs is the backing of the boss, to put it plainly. At the moment it feels like DEFRA is still working through some of the reforms that came five, six or seven years ago—things like the move towards public money for public good. It is still struggling to get out the door the basic ambitions like generous farming contracts, revised fisheries management, plans for marine protected areas—reams and reams of promises that have been on the books for a long time. What DEFRA needs is the backing from the Cabinet Office, from the Prime Minister, from No. 10, so that when it comes up with proposals that go to write-round they get approved, and when it comes up with new delivery plans it has the backing to get things through the door.



Q23 Carla Denyer: Thank you so much for the really good answers so far. I have appreciated your plain speaking. I am interested in air quality specifically, so I will come to you first, Livi, but if either of the other two want to come in afterwards, that is very welcome.

Livi, you have anticipated most of the questions I was going to ask, so well done. Picking up on what Manuela was saying and what you were saying earlier about cross-Government connection, I am interested in cross-government in the other direction: the connection with local government. To what extent do you think the revised EIP on air quality is joined up enough with local government?

Livi Elsmore: It is an important question, because local government has a number of legal responsibilities around air quality, but we know that air pollution is a national and a localised issue and you have air-quality hotspots around the country. It is local authorities, as national Governments are always saying, and then also metro mayors and regional authorities who are the ones who know their areas best. They often have the levers on the ground as well as those legal responsibilities.

It is clear that local authorities are supposed to be key delivery partners in this EIP. In fact, that is acknowledged in the EIP. The Government say that they will require action at all levels of government to tackle air pollution in the way that they hope. Under goal 2 specifically, the Government say in the EIP that local authorities have the powers that they need to tackle air pollution, and they certainly do have a range of powers.

As the Healthy Air Coalition, we are not entirely sure that local authorities always have the powers and the resources that they need to take action on air pollution, particularly in a challenging funding environment. We think that while there are good measures in the EIP, if we really want local authorities to be at the forefront of making this change happen, the measures that are here need to be supplemented with those resources. What we see currently in the EIP on local authorities is a commitment to provide supplementary guidance, refreshed guidance, webinars and materials for local authorities.

I am sure those things will be useful, but when it comes to active enforcement, take an issue like domestic wood burning. It is quite an antiquated process of people making complaints in their local area of illegal practice, and then a local authority officer has to go and check for signs or evidence of visible smoke coming out of chimneys. It is antiquated because visible smoke does not necessarily represent what is dangerous when we are looking at an often very invisible problem in these times, but also it is quite hard for that to happen and there is a delay. Does that system work? Not necessarily. It is very resource-heavy for local authorities. When we are talking about resources, I suppose the Government would say, "Well, maybe the powers that local authorities always have are not being used enough." We certainly know that practice could be better.



On wood burning, Healthy Air Coalition member Mums for Lungs found that in smoke-control areas in England last year, 9,274 complaints about illegal burning were made to local authorities but only 24 fines were issued. I will leave it to the Committee to decide whether that is a system of enforcement that is working well, but it is clear that we need to see more than refreshed guidance, webinars and materials if local authorities are really going to do the work on the ground to tackle that issue.

Q24 **Carla Denyer:** Picking up on the point you were making about resources for local government—it is all very well having the powers, but if you do not have the resources to do it—a freedom of information request late last year revealed that the amount of funding the national Government are providing to local government on air quality has plummeted. It seems a very timely thing to draw out. Thank you.

Richard Benwell: One of the structural issues we see with national environmental targets is that very often they do not get passed down to the people who make decisions. That has been a real problem for the Environment Act and we are trying to get that done for things like the new water regulator. It makes a difference when it happens, and saves time on vague reporting. This could be done for the new strategic authorities in the devolution Bill. There have been amendments proposed that would do that with the Environment Act, the Climate Change Act and air-quality regulations, to help them to focus on that. That would be a really good local planning join-up with those national targets.

Chair: Richard, Ruth and Livi, thank you so much for the evidence. I am really pleased that we managed to get to the end of the session. People will be able to hear the Division bell ringing, and Members will now need to go and vote, so I will bring the first panel to a close. The sitting is suspended.