

Environmental Audit Committee

Oral evidence: Tony Juniper CBE and Marian Spain: Valedictory, HC 594

Wednesday 2 September 2026

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Members present: Mr Toby Perkins (Chair); Julia Buckley; Jonathan Davies; Barry Gardiner; Sarah Gibson; Adrian Ramsay; Martin Rhodes; Blake Stephenson; John Whitby; Sammy Wilson.

Questions 1 - 77

Witnesses

I: Dr Tony Juniper CBE, Outgoing Chair, Natural England; and Marian Spain, Outgoing CEO, Natural England.

Examination of witnesses

Witnesses: Dr Tony Juniper CBE and Marian Spain.

Q1 Chair: Welcome, everyone, to this meeting of the Environmental Audit Committee. I am delighted that we have Dr Tony Juniper and Marian Spain from Natural England for a valedictory session. Thank you both so much for agreeing to come along to today's session. As people leave post, these sessions are extremely valuable and give people an opportunity to look back on their achievements and the things that they wish they might have done or been allowed to do. On behalf of the Committee, I would like to thank you both very much for your contributions and commitment to your roles. Tony, you have had seven glorious years. Are you glad to be going, or are you sad?

Dr Juniper: It has been an absolute pleasure. It is a demanding role, but one in which I have been pleased to be able to make some progress on the big job of nature recovery in Britain. I think it is fair to say that when Marian and I came to work together in 2019, the organisation was not in a great space. It was quite demoralised, quite weak. During my early months, I remember thinking that there are three things that need to happen. The first was that we needed to get a strategy that is fit for purpose, one that combines all the diverse work that we do across the 500 different powers and duties that we have been granted by Parliament over decades. How do we make sense of that to make the best possible impact for the country? That was a big heading.

The second thing was about funding. We had a pretty slender budget compared with now. The third thing was about restoring morale and confidence in the organisation, and I think Marian and I did that quite well between us early on. Our budget today is about three times bigger than it was back then, and we have a very clear strategy that is not just about species and habitats but about harnessing nature recovery for economic development, for public health and wellbeing, and for national security and resilience.

If we look back over the years, I think it is fair to say that the organisation has been very busy indeed. We assisted Government in making some quite major changes to agricultural policy. There was the emergence of the environmental land management scheme, for instance. We advised the Government on that, and we are now helping with its delivery. That includes the landscape recovery programme, which is a very exciting new frontline for nature recovery in Britain.

We have assisted with the challenges of how to enable built development at the same time as protecting nature. We have also assisted with various initiatives such as the district-level licensing scheme, which now takes a view of great crested newt populations across a landscape, rather than an individual newt stopping a development. We assisted with the nutrient mitigation scheme, a very complicated but necessary measure to protect rivers from additional pollution, and we are now in the process of taking the nature restoration scheme into delivery, including on nutrient

pollution. We have done some fantastic work on protected areas with a new series of national nature reserves. We have done wonderful work on species recovery, including bringing back species previously extinct in these islands, such as the beaver and the white-tailed eagle.

We are now looking at ways in which we can further connect people with the natural world. We have done some fantastic work on green social prescribing and green infrastructure to enable local authorities to do more with nature. The two major national trails that recently opened were also completed with Natural England workers on the ground: the King Charles III England coast path, which is the world's longest walking trail around a coastline, and the coast-to-coast path across the north of England.

Chair: I will stop you for a minute, Tony, because I feel that the next two hours might fly by.

Dr Juniper: I could carry on. We could do another hour of that.

Q2 **Chair:** I got that impression. Obviously, you have just taken us through an array of different measures. When you look back on what you see as your key achievements, do you think you are walking away with nature in a stronger place than when you arrived?

Dr Juniper: Undoubtedly. One of the things that is striking is the extent to which, at a national level, we still have debates about whether nature or economic development is the priority—we have fruitless clashes about that false choice. If you go to the ground level, however, and speak to farmers, major infrastructure companies, NGOs or communities, a lot of really good work is going on, and it has been our privilege to be able to assist some of those partnerships to build up the momentum they now have.

It is almost like a parallel world. At the national level, the conversation seems to be, "Nature is in decline, yes, but do we actually wish to do anything about it? Well, no, not really, because we need economic development." That does not take us very far, but if you get down to ground level, people increasingly get it, and I think it is fair to say that we are in a much better place now compared with where we were seven or eight years ago.

Q3 **Chair:** You allude to that nature versus growth discussion. In fairness, that is something that has potentially also been perpetuated by people in the Government. That is not something that has happened in the absence of politics. Give us a sense, from your perspective, of the extent to which you feel that you and your agenda were being seen as an enemy of growth. Did you have that sense at all?

Dr Juniper: Totally. It has been there in different forms throughout the time that Marian and I have served together. There have been various moments where it has become very prominent as a political talking point. It certainly got into the newspapers. There are various interest groups behind that, and various political reasons to foster a culture war that does not really have much reality behind it. We have a vast body of data that reveals how nature is a vital underpinning for economic development in



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every sector of the economy. We know it is vital for public health and wellbeing, and we know it is a source of resilience and security as we lean into an uncertain future. But for some reason, there has been seen to be some advantage in presenting this false choice, and it is still there. There is still the idea that we should deregulate to free up the economy and do away with these species protection laws for bats, dormice, newts, snails and whatever else makes it into the media. It is a groundless argument, however, because we have a vast body of data that reveals how there is every good economic reason for investing in ecological recovery.

- Q4 **Chair:** Let us pause for a minute at that juncture. There has been a sense over the years that different people in the Government have maybe had concerns about that approach and the vigour with which you pursue this argument. Is it your sense that people were keen for you to move on, or did you feel supported in the role?

Dr Juniper: "Supported" is not a word I feel I would put at the top of my list of reflections on my time at Natural England, but I am still here.

Chair: Not for long.

Dr Juniper: No, not for long, but many of my vocal critics are long gone, which maybe says something about the democratic process and the extent to which the public really do want high environmental ambition from the people who are elected.

- Q5 **Chair:** You are speaking slightly in riddles there, but you are suggesting that the electorate have had their way with those who were hostile to your agenda. Is that what you are saying?

Dr Juniper: It is possibly one interpretation, isn't it?

- Q6 **Chair:** Have you felt better supported under this Government, or do you feel there will be people raising a glass when you walk out the door?

Dr Juniper: I am sure there will be a range of reflections as I depart. I have now served under six Prime Ministers, and I think it is fair to say that the appetite for nature recovery has varied between them. If I think back to the period when we had the strongest backing, it was when Boris Johnson was Prime Minister. During the period since, we have had changes to the emphasis placed upon this. Quite a lot of that, especially over the last few years, has been the very strong presentation of the false choice between whether we should pursue economic development or look after nature. Our very strong evidence-based contention all along has been that we need to do both/and, and that if we do that in an intelligent way, it will help the economy.

- Q7 **Chair:** I am sorry to press this point. I do not wish to embarrass anyone, but I think it is important, given the respect in which you are held. Can you be clear: were you basically asked to leave, or was it a choice that you made?

Dr Juniper: No one has asked me to leave. They have only asked me to stay. I have been reappointed twice under different Governments.

Q8 **Chair:** Okay, so you are going of your own accord?

Dr Juniper: Yes. I will reach the end of my third term in April, and that will be my time done.

Q9 **Chair:** Excellent. You have reflected on many of those successes. Looking back now, what are the areas that frustrate you in terms of the things that might have been achieved in the seven years but perhaps were not?

Dr Juniper: As I said at the beginning, there is a lot that Marian and I, and the team that we have worked with, proudly look back on. There are not many disappointments in terms of the delivery that we have achieved on behalf of the country, but there have been some considerable challenges. We have already touched on one of them: this idea that there is a choice between nature and the economy. That has been quite frustrating and difficult to deal with. It has slowed things down, not just for us but for many of the customers we work with, including infrastructure providers who found it to be quite an unhelpful context for them when making the case to their stakeholders for what they need to do. The impression has been created that the Government are trying to cut corners and deregulate to harm nature and favour development. That may not necessarily be true, but it is one of the impressions that has made it quite frustrating and difficult for us.

Looking forward to the work that our successors will need to do, the task of seeking to integrate nature and environmental protection across Government is a critical, ongoing job. We have made some good progress on that, but it is not just DEFRA that needs to deliver on environmental security and rebuilding the health of nature; it is a job that needs to be embraced right across the piece, which is why it is particularly damaging when, from the centre of Government, we hear the idea that there is a choice. It is a false choice, but it is constantly being reinforced.

Q10 **Chair:** Turning to the specifics, 35% of protected sites are now in good condition. The OEP target was 75% by 2030, but it suggests in its latest report that we are predominantly off target to achieve that. In fact, progress is declining rather than improving. What are the main reasons why that key metric is being missed so substantially?

Dr Juniper: Very often it is big cross-cutting issues that are originating outside the protected area, such as air pollution, water pollution, fragmentation and now the effects of climate change on top. All those things are having a bearing on the state of protected areas. Inside some of them, there are issues linked with grazing, the insufficient management of woodland coppice or the clearance of volunteer trees that are appearing in heathland.

Some of those things we can manage on site, and we seek to do that, but quite a lot of this is originating outside the protected areas. That is why we have been very pleased to be working with the new provision that we got from the Environment Act 2021. That enables us to develop so-called protected site strategies, which go far beyond the boundaries of protected areas. That enables us to get our arms around some of those things that

we previously could not influence because our powers were limited to within the site of special scientific interest.

Progress is being made there, but this underlines the need for us to take an integrated and holistic, landscape-scale view and to draw together the tools that we have on water pollution and air pollution, to reconnect fragmented sites, and to do this in a way whereby we have some spatial objectives in mind. It is also worth mentioning the local nature recovery strategies, which are another very important opportunity, looking forward, for how we can do this work.

- Q11 **Chair:** I will let you have a breather for a moment, Tony, and turn to Marian. You joined the Natural England board in 2018 and have been permanent CEO since 2020. Turning away from the overarching narrative to the day-to-day operations, what is your sense of the key challenges that the organisation has faced across that period? What do you feel are the key strengths and weaknesses that you will leave it with?

Marian Spain: The first thing I want to talk about answers both those questions, because it is an opportunity but also a risk if we do not get it right. Tony mentioned our new strategy, which is nearly a year old—it was a year in the making before that. What is significant about the strategy is that it brings together two important changes for the way that we think about nature.

First, the strategy is firmly in the space of nature being here to give us services. It is not just about nature for its own sake; it is about nature as a vital contributor to the nation's growth, health and security, as Tony touched on. It also takes a step even further forward than the one we made three or four years ago by being absolutely clear that nature is not just about the legislative protection of places and species but about recovering a whole ecosystem and building resilience. The challenge for us is that our strategy is very different but the way that we receive our funding, the powers that we have and the legislative framework under which we work are not changing as fast as we might want, so we are having to make some quite significant pivots and rethink very carefully how far we can operate within our existing legislation, powers and duties, as well as bringing not just our own staff but some of our traditional allies with us on what can feel like quite a significant shift. It is interesting that many others in the sector are now talking that sort of language, and the Government are increasingly talking that language. That is the first opportunity and challenge.

- Q12 **Chair:** What is the key advice that you would give your successor, in terms of taking on the role and what they are likely to face?

Marian Spain: The first thing is the sense that, although we have shifted our strategy and are seeing some change in the narrative, as a society we still too often think about nature as a "nice to have", not as a piece of essential infrastructure. We hear that talked about a little more. It has been interesting that the summer we have just had has upped the public discourse on the fact that nature is a vital service. I think my No. 1 advice

to my successor is: keep heading in that strategic direction of thinking about why we need nature.

The really big challenge that I have faced and that my successor, Neil Hornby, will continue to face is that, although we are starting to create that thinking, we are not yet thinking as a Government, as a group of Departments and as a group of ALBs across Government. We do not yet have a fully formed system for how we manage nature. Natural England owns only a small proportion of the levers that we need to achieve our mission. We rely on others in the Government. We rely on what other regulators can do. Tony has already given the example of water quality, which is a very obvious one. We have no powers to affect water quality, but it is one of the top five reasons why nature is in decline. That is the other advice: keep working with our colleagues in DEFRA and use the EIP targets and the emerging DEFRA outcomes framework to think about how everybody in the Government needs to contribute to building resilient ecosystems.

Q13 Sammy Wilson: I want to turn to the resources that you have available. Back in 2020 you wrote to the Committee saying how the resources had been reduced during spending periods and so on, although I noticed that you said in your answer to the Chairman that one of the achievements was to increase resourcing by 300%—

Dr Juniper: Yes.

Sammy Wilson: And last year there was an uplift of 5%, which was above the general level of inflation. What is your resource situation like at the moment?

Dr Juniper: First, thank you to the Committee for carrying some of the messages that we sent to you in that letter, which I do think was influential around the time of that spending review and led to an increase in the resources available to us. We have expanded enormously in terms of both budgets and headcount—although that has reduced a bit now—and we have also expanded the work considerably to embrace, for example, landscape recovery and more work through the planning system, which is intensifying our efforts there. The budget has expanded and the work has expanded.

A really important thing lies behind this, though: the relative allocation of budget. Back in 2019-20, most of our budget—I think about 70% at the time—was grant in aid, which was basically at our discretion to spend in ways that we saw would most efficiently advance the strategic goals we had adopted, whereas now the money that we have for the core business is about 30%, and 70% is allocated year by year by DEFRA in in-year transfers. That is not necessarily a bad thing—we are here to advance the priorities of the Government and reflect the law, so that relationship is not necessarily wrong—but going back and renegotiating budgets year by year does make it quite hard for us to do multi-year planning. Nature recovery, by its very nature, is obviously a long-term project. It will not happen in



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one year, or even two or three years; it requires an investment of effort over a period of time that sometimes does not reflect the budget cycle.

We very much welcome the increase in resources and we very much welcome the extra work that we are able to do and our ability to increase the impact, but there are some constraints around how much money we have got to spend on our statutory duties. On that side, we are being asked to find more efficiencies. As the budget is expanding, the proportion and the absolute amount under our direct control are going down, and that presents some quite significant challenges, including in relation to the management of the national nature reserves, which are a very important national asset for the country.

We are looking at all that, and we do what we can. We do not want to waste any money. We are always seeking to get the biggest impact from the investment the Government make in all of this, but there come moments when it becomes quite difficult to see how to do that when the budgets get so small and so tight.

Q14 Sammy Wilson: Are you saying it is more about how the Government constrain your spending than about the total amount available?

Dr Juniper: Yes. I think it is fair to say that we very much back the priorities that are there—landscape recovery, investments on the planning side, and doing more to think about the delivery of local nature recovery strategies—but these things are not under our control. It would be helpful to have more discretion and the ability to plan more in advance.

Marian Spain: Would it help if I gave an example that is in my mind at the moment? Our team that advises farmers—the 400 staff whose full-time job is to be out working with farmers on a day-to-day basis—are not a fully integrated team of 400. A farmer should feel that whoever he is talking to could advise him on the breadth of nature issues, but they are funded through four different parts of the DEFRA budget. They are funded through the catchment sensitive farming programme, which is mainly about water and air pollution—it is a really important programme, but it has one funding line; there is a funding line for the work we do on advising the RPA on agri-environment schemes; there is a funding line for the landscape recovery scheme that we run; and there is a separate funding line for the work we do on protected sites on farmland. We are effectively blending four budgets into one person, but having to report those four budgets separately back into Government, and report targets against those four budgets—

Dr Juniper: And every year.

Marian Spain: It is not impossible, but it feels as though a sense of thinking about nature as a system, including with an individual farmer—all the things that he could do on his farm that will help his business and contribute to nature recovery—is not fundamentally built into the DEFRA system.

Q15 Sammy Wilson: Do you find that, because it is done on a yearly basis,



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the amount can fluctuate quite substantially? Is DEFRA aware that this is really not just a one-year effort but a multi-year effort, and that that should therefore be reflected in the continuity of the payments to you?

Marian Spain: It definitely fluctuates. Happily, it tends to go up. This year, we have been asked to increase our catchment-sensitive farming advisers because of the new Government focus on water quality, and water quality on farms. It has, happily, fluctuated up, but of course we cannot secure against that for the future.

Q16 **Sammy Wilson:** I note that 8% of your budget comes from selling your own services. There is considerable opportunity for that now, because developers will be looking for advice from you. Is there much of an opportunity for you to increase your resources through the sale of services, so that you are not dependent on the grant aid?

Marian Spain: We were given the powers two years ago to cost-recover the services we give to major infrastructure developers for nationally significant infrastructure projects, so we can now recover our costs for that. The difference that has made is that we are better able to match supply and demand. It is not that we necessarily have more income, but we can give the developer certainty that we will have the resource—and it is often the same resource. We can create a team to work on something like the work we are doing with National Highways on the lower Thames crossing. We have been able to guarantee funding for a stable team. It does not necessarily give us more money.

We hope to be given further powers this year to do the same for town and country planning, so that it is more likely that we can match our resources where we are giving a service to, for example, housing developers through the work we do with local government.

Q17 **Sammy Wilson:** It would be useful for the Committee to push that recommendation for you. Tony, you mentioned that you had to reduce the number of staff by 200 full-time equivalents this year. What practical impact has that had on your delivery?

Dr Juniper: We have looked for efficiencies rather than removing streams of work, and we were able to do most of that through internal reallocation and a voluntary exit scheme. We tried to minimise the impact on individuals and to recast the business in ways that absorbed efficiency gains, rather than dropping stuff out. Digital technologies and getting smarter about how we work help a little bit. So far, it hasn't felt to me that the reduction in headcount has led to a diminishing of the organisation's impact—it hasn't, has it, Marian?

Marian Spain: The other thing is that we made the decision on where we wanted to shrink. We did not let everybody go who wanted to go; it was a voluntary scheme, but we also targeted where we thought we needed to go. We knew we needed some different skills, so it has given us that headroom. Last year, we lost 220 staff who were working on the lower-priority programmes; this year, we are recruiting 100 new staff with

different skills to work on different priorities. It has allowed us to evolve our workforce, in line with our new strategy and Government priorities.

Q18 Sammy Wilson: We hear a lot of talk at the moment about how AI is going to help to improve efficiencies, especially in the service side of industry, and the fear is that it will lead to many reductions in staff. How do you see AI applying and helping in the work that you undertake?

Dr Juniper: For our science teams—we have a very strong body of scientific expertise in the organisation, and they look at data the whole time to understand the changing state of the natural world—the combination of remote sensing, satellites and drones, linked with the use of AI, is enabling us to do more and to get better information more quickly. That does not diminish the need for us to have good ecologists to design and interpret the work, but we see big opportunities there.

Last year, we did a famous piece that got on to some TV programmes: we surveyed the seal population along the north Norfolk coast using a drone, and we then gave the drone footage to an AI to count the baby seals. Normally, that would take a lot of time and people walking up and down with binoculars. We got a very quick and good piece of evidence out of that. We see huge potential in those kinds of things.

Where I hesitate—I think Marian would agree—is on the extent to which digitalising some of the customer service and interface we have with people might not necessarily lead to good outcomes. If we start taking out the human factor, the things that society wants us to do may be achieved less efficiently. A major infrastructure company we saw recently remarked on how much they valued face-to-face conversations with our officers when trying to solve some of the problems they face. That is about the human level as well as the technical level, but it does make a difference to the trust we have with people who are trying to do big, complicated projects and to understand what we as a regulator ask of them.

Similarly, with farmers, we have heard repeatedly about the extent to which people running farm businesses really value someone coming to their farm and talking to them. Going to a chatbot or a website does not have the same quality. Protecting some of that trust-building, human, face-to-face interaction, while recognising that AI can do a lot to help us, is key.

Marian Spain: We will use AI to deal better with things like data processing, and to speed up handling. At the moment, we are trialling whether we can use it to triage the planning applications coming our way, to judge the ones that need our attention and the ones that can be automatically rejected. But we would not expect it—the other example Tony gave was about fieldwork. More and more fieldwork, data monitoring and SSSI monitoring could be done remotely, but the value of SSSI monitoring is not just in what we see on the SSSI, but in the time we spend with the landowner. Even if we did the survey work remotely, I would still want an officer to go to a farm to tell the farmer what we found



and offer him suggestions on what he could do to improve the state of nature.

- Q19 **Martin Rhodes:** In your opening comments, you talked about the debate on the relationship between economic growth and nature. I am not necessarily asking you to go back over that ground, but are the current Government correctly understanding that relationship? Have they got the balance right between the two?

Dr Juniper: If you mean the new Government as of July 2026—

Martin Rhodes: The Labour Government as of 2024—then and now.

Dr Juniper: My honest answer would be that it was mixed. The Secretary of State who first came to DEFRA after the 2024 election was very strong on nature being a part of the economic plan for the country and seeing the synergies between the two. It is fair to say that some of the messages that came from the Treasury and No. 10 did not say that. It was much more of a binary: “It is nature or development, and nature is getting in the way, so we need to downplay the nature side.” Those two messages being in play at once was quite concerning for a lot of people who watch from the outside as to the direction of travel and whether some of these big and important ecological issues are really going to be gripped.

This was not helpful to the Government, never mind to the agenda, because a lot of the policy that was being crafted at the time was good, in the sense of being both/and—both development and nature recovery being done together. As that debate was raging in the newspapers and in Parliament, to an extent, we were helping with the drafting and the thinking behind the Planning and Infrastructure Act, which has done what we would say is a reasonable job of finding that accommodation, going from where we were to a better place in being able to look at strategic solutions.

I think it was a failure of narrative rather than substance. Hopefully, it will be corrected as we go along, because there is no need to do this. We know that we have the tools and expertise to be able to do both/and. We can develop the economy and build houses and, at the same time, we can recover nature, but we need to have a big-picture view where those two things are in mind at once, rather than being seen as separate things that clash now and again, which is what tends to happen.

- Q20 **Martin Rhodes:** You talk about the narrative being the problem, but is there also a problem with the structure of Government, in terms of the power being with the Treasury at the centre of Government, as opposed to a Department like DEFRA? Is that a structural problem in the Government itself, regardless of party or politician?

Dr Juniper: It is a structural problem and a framework problem. Marian has already touched on the need for us to have an approach based on the idea of nature being critical national infrastructure. In the wake of this summer, we might start to see some thinking about how we could do that.



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Water supply does not only come out of taps; it comes out of the natural world, filtered through soils and via aquifers. If you want to stop a wildfire, yes, you can clear all the vegetation from the landscape, or you could have some of it wetter with wetlands. You could have more deciduous woodland to create shade and hold humidity. There are a whole host of ways in which we can improve conditions for people and improve resilience by investing in nature as infrastructure. I think we are on a journey whereby this may begin to get some traction, we would hope.

Marian Spain: You have evidence from Natural England to your inquiry, including looking at the Treasury's role. I am sure that, in due course, my successor, and possibly still Tony, will be keen to talk to you.

As Tony says, we are not necessarily seeing the value of nature being factored into economic decision making. For example, I was out with the Environment Agency recently, looking at a flood defence scheme in Salisbury that is also adding huge social and environmental capital to the city. That is not easily driven by the current flood economic valuations, which are largely based on the value of property being protected rather than on the added societal benefit. That is the kind of thing where, if we could think about finding better ways of valuing nature and recognising the return on investment in nature to things like health budgets, social care budgets and so on, the Treasury could add real value in valuing nature and recognising it as a service. That would help in getting sufficient investment not just from Government budgets, as that thinking would also drive choices made in the private sector about where they could add value to their own business by investing in nature.

Q21 **Adrian Ramsay:** To pick up on that same theme, you mentioned, Tony, that there has been a failure of narrative in terms of the Government pitching economic success and nature as being at odds with each other. Would you say that false pitting has had any impact on the economy? Indeed, what impact does nature decline have on economic success? Just how badly is this a false narrative?

Dr Juniper: It is hard to draw the line around cause and effect, but if you look at the very big picture—the fact that the climate is now visibly changing before our eyes—and at the vulnerability of our infrastructure and some of the services that we rely on, this summer was really quite instructive, wasn't it? There was unprecedented summer pressure on the national health service; infrastructure, including railways, was affected by heat; and the impact of extreme fire stretched the emergency services. There has also been an as-yet-unknown impact on food production—it has been one of the worst harvests ever.

If you look at all the factors that lie behind that, you can see that the degradation of the environment has made it all worse. Obviously, climate change is the macro global issue, but behind that we have spent centuries desiccating our landscapes. We spend millions of pounds removing water and putting it into the sea, so is it any surprise that, by the summertime, the land is as dry as a bone and we have no water upon which to draw because we have deliberately got rid of it all?

The way some landscapes are managed makes them very fire-prone. More woodlands, wetlands and mosaic habitats would help us to avoid some of that. Once you start to look at the individual events and then the wider picture, you start to see that investing in nature recovery will be a way of making us more resilient as we go into this rather uncertain future that is now driven by rapid global heating.

Q22 Adrian Ramsay: Conversely, do you think a failure to invest in nature recovery harms the economy?

Dr Juniper: Yes, that is the flipside. A failure to invest in nature recovery will make us more vulnerable. This goes back to the idea of nature being seen as critical national infrastructure. The default at the moment is to see looking after nature as a cost, rather than as an investment. If you invest in infrastructure like a road or a railway, you get a return for the economy. You can see that it will give a fundamental boost to economic wellbeing; so it goes with wetlands, woodlands and healthy coastal areas. That is the infrastructure we are going to need in future, and it will give us a dividend, in the sense of avoiding some of those impacts becoming more serious than they already are.

Q23 Adrian Ramsay: The previous Secretary of State issued a strategic policy statement earlier this year that noted that its foremost priority is delivering economic growth, and you are expected to be part of delivering that. How have you ensured that nature is front and centre of Government priorities? To what extent is your voice heard, as Natural England, in the way that you would expect?

Marian Spain: Tony has said a lot of things that I will not repeat. We absolutely have a role to play in growth. We absolutely recognise that society needs infrastructure, clean energy and housing. Our job is not to stop that development happening; it is to do it in the most nature-friendly way possible.

There are two layers to that. First, there is making sure it is compliant with the regulations that we are bound by Parliament—not just Government—to comply with. As a major infrastructure developer put it to me rather pithily, “Your job is to keep me out of jail.” I perhaps wouldn’t have put it like that, but our job is to help developers to comply with the regulations.

In line with our strategy, we also think it is our job to make the development as nature-friendly as possible. A colleague of mine put it rather nicely: we should be saying to developers, “Yes, and”. It is about growth also contributing to nature. We are protecting nature where regulation requires protection, but we are also looking to build social and environmental capital into major development.

We have seen a number of examples of that recently, including the work that Sizewell C have done in their major development. They have already invested in the environmental infrastructure, so they have already met a number of their regulatory obligations, because they built the environment before they started building bricks and mortar.



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We are seeing that with some of the water companies. With the Fens reservoir, we are talking already about how we design the reservoir for little or no additional marginal cost to really add in social and environmental benefits, as well as creating the economic water resource that we need. That is where we are seeing a win-win.

In terms of how that has changed us as an organisation, it is the example that I gave you: our staff are saying "Yes, and" more. Occasionally, it is "Yes, if," but more and more it is "Yes, and".

Q24 Adrian Ramsay: I totally agree on the win-win. In terms of the overarching Government policy, though, are you listened to as much as you want to be? Are you consulted when you expect to be?

Dr Juniper: We are an adviser, not a decider. We put ideas into the system. Sometimes, it is hard to know what happens to them.

Marian Spain: On the positive side, Tony has already referenced the Planning and Infrastructure Act. We can perhaps use that as an example of where the relationship worked very well. We have been delivering what we would now call strategic solutions for a number of years. We did the district-level licensing, which pre-dates us both. We set up suitable alternative natural green spaces—SANGs; if housing is being built and the people living in those houses might affect nature nearby, we create more green spaces and spread the load.

We have been creating the natural infrastructure up front to enable development for a number of years. It was that thinking, along with the nutrient mitigation scheme, which we established on Government direction a few years ago, that fed into the Planning and Infrastructure Act. We see that as a really positive example of where our delivery experience—not our opinion—and knowing how these things work had a major influence on Government policy and legislation. We are poised to consult on the first EDP any day now.

Q25 Adrian Ramsay: I am pleased that you had that impact and I am sure that that is what we would all want to hear. Is there an example, though, of when you have tried to impact policy and have not been listened to?

Marian Spain: May I give an example of something that has not succeeded yet? We have sat in rooms with this Committee and others talking about some of the challenges that landowners can feel SSSIs create. They are an imposition on the landowner—I mean that in a technical way: they restrict landowners' land-use rights and require more of them than we require of other farmers when it comes to delivering for nature.

We no longer have the budget or the powers to pay farmers for that and reward them for their endeavours; that all comes through the agri-environment budget. We have been advising DEFRA to think about not just how we design that scheme but how we communicate it to farmers and whether there should be a bonus payment for those who get their SSSIs into good condition.

That is still a work in progress; we are still giving that advice to Government as we roll out the next round of the higher-tier scheme. That also supports Government, of course, because it hits the EIP target that the Chair referred to earlier given that we are still some way off having our SSSIs in good condition. One of the reasons is that we can give farmers advice, but it is hard for us to reward them directly.

- Q26 **Barry Gardiner:** One of the ways in which you assist economic growth and development is through biodiversity net gain and the register of BNG. The site register, which you run on behalf of DEFRA, provides that publicly available information on sites, particularly those needing off-site credits. But I think that for the past 14 months that register has lacked one very important fact, which it previously had: the designation of the defined boundaries of where the habitat creation and improvement would take place. Why?

You have said publicly that it was a technical hitch, but it has now been 14 months. When will those boundaries be added to the site mapping? All there is at the moment is a point of reference. If you have a 100-hectare site, a point of reference is no use—you need that boundary. When will that be set to rights? Will all those that have been added to the register since that lacuna took place automatically be updated with those boundaries?

Marian Spain: I am going to be straight with you and say that I will need to write to you on that. I do not have that information with me. To be clear, as you said, our job on BNG is only to hold the off-site register; local authorities hold the on-site register.

- Q27 **Barry Gardiner:** Absolutely. It is the off-site register that I am referring to.

Marian Spain: The on-site register is not published. The brief history of the register is that we had anticipated a very high demand in its early years and staffed up accordingly. That demand did not come to fruition, so it seemed reasonable at the time to move some of those staff on to other work. Demand has grown a bit in the past few months and we are slightly behind. May I write to you with an update on the exact dates?

Barry Gardiner: Please do.

Marian Spain: We are aware that we are behind, and a number of developers have contacted me to say that they are anxious that we might hold up their applications.

- Q28 **Barry Gardiner:** What I am anxious about is the accountability because if the public do not know where something is, you cannot be held accountable. Also, how do you go about enforcing?

Marian Spain: To be clear, we do not enforce; the planning authority does.

- Q29 **Barry Gardiner:** Yes, indeed. But the planning authority needs to know in order to enforce.



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There are other things that could be on that register. Would it not be helpful to publish who the project provider is; the spatial information on the project layout; the expected biodiversity unit generation on the site; or reporting on habitat creation progress? We would then begin to get a real feel for what is happening with BNG, but at the moment we do not really have that.

Marian Spain: We don't. Without repeating myself, the other thing is perhaps an example of where the Government did not take our advice. We were also concerned that such public transparency does not apply for on-site, where developers are doing it themselves.

What we have seen with BNG policy in recent years is that it has been rolled out, but those decisions about individual elements of the system do not necessarily add up to the whole that the public might expect. Of course, what we have also seen in recent years is perhaps a perceived softening of some of the endeavour on BNG. When there is talk about making a change and simplifying some of the systems, we are then seeing it create uncertainty among developers over whether they want to participate, which is another reason why the demand for our register dropped and we moved stuff off.

What we have also seen, for those who might want to provide off-site units, is the opportunity for this to be an income-generation or green finance option for farmers, but we now see that farmers are reluctant to commit to a habitat bank. If I may widen that point, that is one of the things we have very clearly in our minds as we roll out the environmental delivery plans. We need landowners to have confidence that the policy will be sustained, and that the income will be guaranteed for them.

Q30 Barry Gardiner: On environmental delivery plans, the Leverhulme Centre for Nature Recovery at the University of Oxford has said, "We have significant concerns whether Natural England are sufficiently resourced to formulate properly evidence-based EDPs alongside their existing remit", and it questioned whether this would lead to trade-offs with their other important functions. What assessment has Natural England made of how many EDPs it will likely have to produce in the coming years—2027, 2028, 2029 and 2030—alongside the monitoring, enforcement and evaluation of those as they accumulate over time?

It is a huge demand, and we all understand why we want it done. However, unless the resources are there to ensure that it is done, and done properly, this is just saying we are doing something. We are just saying, "Oh, we've got environmental delivery plans", when actually they are worthless.

Marian Spain: We notified the Secretary of State just before Christmas that we would be making 23 environmental delivery plans over the first two or three years. Our board has recently approved the first of those plans, and we are just going through the final processes with DEFRA to get that ready for consultation, so we have done the first one.



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Those first few are being resourced by grant in aid from DEFRA, so we have had a direct transfer of resources to allow us to make a start. In future, the resourcing will come from cost recovery; the levy that developers will pay will include the cost. I am as confident as I can be that we have the resources. We certainly have the resources this year, and we started building our team before the Act was even passed.

I should not say this, because it will of course be tested when it goes to consultation, but I am incredibly proud of the document that we have produced. I am also even more confident than I was when the Bill was going through that these will add value. We have looked hard at the overall improvement test and the evidence. We have had independent scientific scrutiny, and we have had external legal counsel, so I am confident that the product is good. To reflect your point, that needs a high level of resourcing and a broad range of skills, including technical skills.

As we move forward, on which we have just started a bit of dialogue, the product needs to be right so that everybody trusts it. We need developers to trust that it is going to be a better and faster alternative for them. Most developers are also concerned about their reputation. They do not want to pay into a scheme that is seen as substandard; they want to believe that their money is doing good.

We need the NGOs to trust it, because they quite rightly held our feet—and indeed, parliamentarians' feet—to the fire as the Act went through so that it is definitely better. We need planners and the local community on whose behalf they act to believe that nature will be better. As we have already said, we need landowners to trust that, if they put land forward, they will get fair reward.

Q31 Barry Gardiner: Now let's come to nature and being better. I have your NE annual report traffic light system—I hope you can see it from there.

Marian Spain: It looks quite green from here!

Barry Gardiner: It is beautifully green, with a couple of bits of amber. Basically, that tells me that you are meeting your KPIs. Then I look at what the Office for Environmental Protection says about the state of nature recovery, and it is red and amber, with a tiny little green spot. Of course, those two are perfectly reconcilable—I am not asking you to reconcile them—because you are talking about achieving your KPIs and the OEP is talking about the wider state of the environment. But doesn't that mean your KPIs are not ambitious enough?

Marian Spain: Our KPIs track—

Barry Gardiner: Sorry, key performance indicators—the public may be listening. Sorry, I hate acronyms.

Marian Spain: Those key performance indicators are measures of annual activity and annual progress—both activity and impact. They are annual. We have designed the vast majority of our KPIs to be aligned to one of those EIP targets, so you can see the line of sight. Sometimes it is a direct



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correlation, like hectareage of new habitat created. Some of them are a contribution, such as state of SSSIs and so on.

Your point is absolutely fairly made. It may be that our KPIs could be more stretching. That is always a judgment, isn't it? As a manager of a business and of a system, do we set KPIs that we believe we can reach, or do we set KPIs that stretch the organisation? There is a fine judgment between stretching and breaking, and always feeling we are failing. The KPIs matter for me in Natural England because I can judge whether we are on track to do what we need to do that year, but I absolutely take your point.

We are tracking annual activity. What the OEP tracks through the EIP process is whether the annual activities—not just of Natural England but of a range of other bodies—will add up to those sums. We cannot yet see those. This is a version of the point I was making earlier: we do not yet have an outcomes framework-driven system that is looking at all the things that Government need to do to hit the EIP targets.

Q32 **Barry Gardiner:** Is it making enough difference? That is the question.

Marian Spain: Absolutely.

Q33 **Barry Gardiner:** We are all starry-eyed about the Kunming-Montreal global biodiversity framework, and we all know what 30 by 30 means. Do you know what target 2 is, rather than target 3?

Marian Spain: Tony, you will know, because you were there.

Dr Juniper: I was there, and I cannot remember what target 2 is, but I do know that out of 23—

Marian Spain: You know what several of the others were.

Dr Juniper: Yes, indeed, but some of them are more prominent than others. Of the 23 that were adopted there, I think the most recent DEFRA report to the CBD says we are doing three out of 23.

Q34 **Barry Gardiner:** There is one that we do not actually have enough data on, and 19 that we are failing on. The one I wanted to talk to you about was target 2: to restore 30% of all degraded ecosystems—terrestrial, inland water, marine and coastal. We do not have a register of degraded ecosystems, so how the hell are we going to meet target 2?

Dr Juniper: It is nearly the entire country, so 30% of anything would meet that target. If you look at the state of England, it is very beautiful—parts of it are absolutely gorgeous to look at—but we do not have much natural habitat left.

Q35 **Barry Gardiner:** But this is not that. This is about ecosystems that are degraded, and we need to be identifying the ecosystems and prioritising the way in which we then target those ecosystems. If we do not know the number, we cannot say.

Dr Juniper: No, I don't think we have a map of that.



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Marian Spain: I don't think we do. That is probably a question for DEFRA, given that this is a Government commitment.

Q36 **Barry Gardiner:** I am sure it is a question for DEFRA—it is one I have asked DEFRA—but do you not need to give some advice to DEFRA? If it wants to meet its global biodiversity framework target, it needs to establish what the baseline is. DEFRA historically has been appalling at establishing baselines.

Dr Juniper: Indeed.

Marian Spain: Our JNCC colleagues tend to work with DEFRA on those global commitments.

Barry Gardiner: David Cooper, coming from the CBD, will make damn sure it does, won't he?

Marian Spain: Absolutely. I will say perhaps two things, which will not necessarily answer your question but will put some context around it. One potential proxy, as we have already talked about, is that we do know the state of our protected sites. We know more about the state of our protected sites and our protected landscapes and habitats than we do about the rest of our ecosystems. If that is a proxy for the rest of it, then we know a significant number of them are still degraded. A significant number of them are not in good condition.

As you say, everybody tends to talk about the 30 by 30 target. We are seeing progress there. It is perhaps not as fast as many of us would wish, but we are seeing progress. The other thing I often find myself saying to my own team in Natural England is, "What about the other 70%?" If you remember when the 30 by 30 commitment concept was developed, that was the minimum we need to protect life on Earth. It is not a target; it is the minimum viable product for nature—

Barry Gardiner: A threshold.

Marian Spain: Absolutely. We should not be so focused on achieving 30 by 30 as a paper exercise, as an exercise in adding up hectares on a map. We see our job—30 by 30 is a step in the right direction, but to do itself out of a job, Natural England would need to be confident that all our ecosystems were resilient, functioning and giving us the services we need. That is what we mean by nature recovery—not an SSSI condition or 30 by 30, but whether nature is in a resilient state to be exploited for the things we need and to cope with the pressures we are putting on it.

Q37 **Barry Gardiner:** That nature recovery is with partners, including land managers, local government and the Environment Agency. How good are those relationships? How well are they working? Are there some that you would like to highlight as particularly successful and some that you would like to say need improvement?

Dr Juniper: When Marian and I wrote the first strategy back in 2019 or 2020, we put the idea of building partnerships for nature recovery as our



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overarching mission, recognising that even for an organisation like ours, with regulatory powers and a great science base, there was no way we could get anywhere near meeting what have become the EIP targets without cross-sector collaboration.

We have put a lot of effort into seeking to build common cause with some of the big landowners in the NGO sector, for example, some of the big estates and, of course, our colleagues in the ALBs, especially those with strongly overlapping remits, in the form of the Environment Agency, the Forestry Commission and the MMO. We have tried to build that sense of common cause, recognising that we have different duties and powers, which were granted to us by Parliament, and different priorities, which are set by Government.

But this job of building partnerships is absolutely critical, and we would say it is all about place-based delivery in the end. In fact, one observation we had was that if you don't do nature recovery in a place, you don't do nature recovery. It happens in particular geographies, with particular cultures and local economic circumstances. So we do have to devolve this to ground level and we need to get out of our policy and organisational silos in order to be able to do this.

This is work in progress, but we have had some great examples of working together with groups of landowners. Some of the progress we have made with the national nature reserves over the last couple of years has been really quite impressive in drawing together lots of different people in a place to do something bigger than any one of them could do. The Seven Sisters national nature reserve, which His Majesty the King came to help us launch back in March, is a great example. The South Downs national park, Eastbourne council, Seaford council, the National Trust, the Sussex Wildlife Trust, Natural England, local government, official agencies and NGOs all came together in a landscape, with a common vision, and that is beginning to yield some dividends. So we are on the journey, but every place is different. The challenges are variable, depending on whether you are in uplands, in the south or the north, or coastal or urban. But there is now some momentum behind some good examples that hopefully can be replicated.

Marian Spain: Can I pick out two specifics from your list? You mentioned other ALBs—

Q38 **Barry Gardiner:** Could you give us examples—

Marian Spain: I am about to do that, yes.

Barry Gardiner: And briefly, because the Chair needs to move on. Could you give us examples of perhaps where this could be improved? It is great to know the good examples, but if spurs are needed on certain Government Departments, we need to know where to apply them.

Marian Spain: In terms of other ALBs, it is hard to give you a bad example because they are all—just by way of examples of things we have done recently, Tony and I spent a day last week with the MMO, looking at



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whether we are doing everything we can where our interests coincide in coast and sea. We spend a lot of time with the Environment Agency and the Forestry Commission. I have just signed a new statement of intent with the chief executive of Homes England, so that we can make sure nature is being built into accelerated housing. Those are the good examples.

One of the challenges we face goes back to something we said at the beginning of this conversation. We do not yet necessarily have a systemic approach to nature. We sometimes find that we and the Forestry Commission, for example, or the Environment Agency can be doing our job as Parliament intended but we do not always coincide. We will sometimes clash and have necessary differences of opinion—for example, about whether the appropriate form of land use is peat restoration or tree planting.

There are areas where we do not always coincide, not because either of us is doing anything wrong. That comes back to the point we made that DEFRA has recently established a series of Department-wide outcomes that my optimism tells me will help us address some of those things, being clear what the outcome that we really need is and therefore how we flex our statutory powers to coincide with that shared outcome.

Q39 Barry Gardiner: The Chair has just asked me to ask you to cash out MMOs and EIPs—environmental improvement plans and marine management organisations?

Marian Spain: I beg your pardon. The Marine Management Organisation, and what was the other one I said?

Dr Juniper: Environmental improvement plans.

Q40 Julia Buckley: I am thinking about some of the regulations that have come through the Planning and Infrastructure Act 2025 and what that means in terms of how these levies could be paid. Regulation 33 sets out that some of the nature restoration fund could be spent on administration, yet the regulations do not specify the amount or whether that should be published. How can Parliament be confident that the levy income is being spent primarily on environmental delivery rather than on administration?

Marian Spain: The secondary legislation going through Parliament this week will define that. When we publish the first EDP, that will be clear on how we have arrived at the levy, and that will be within those constraints. The levy allows us to cover conservation measures, ongoing monitoring and evaluation, set-up costs and administrative costs. That is defined by the secondary legislation, and that will be transparent in the EDP.

Q41 Julia Buckley: Do you feel that there are enough safeguards in there, and that it is specified enough?

Marian Spain: Yes. The vast majority will be conservation measures, necessarily. I cannot tell you what is in the draft EDP, I'm afraid, because it hasn't gone through, but I am confident that the vast majority will go on the creation of those measures; maintenance of those measures for the



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100 years for which some of them will need to be maintained; and the monitoring and evaluation that Natural England will need to do during the life of the EDP to be able to assure Ministers that it has worked and that we have done enough to more than recover nature to meet the overall improvement test.

- Q42 **Julia Buckley:** As you would find with any Government fund. I suppose the question is whether you would be more comfortable if the administration costs were funded separately or in addition to the budget that is allocated to the activity?

Marian Spain: The principle here is that the polluter pays, and the fact that the developer is choosing to develop on a site that will have an impact on a protected site or species. They already have those obligations to put that harm right, if I can use a slightly simplistic definition of what we are talking about. The difference is that, at the moment, they will be obliged to pay for all their own administration costs—of survey work and so on—and delivery costs. The EDP makes that quicker and probably cheaper, with hopefully more impact. I do not think it is an unreasonable decision by Government to say that developers should pay the administrative costs, because they are the polluter, if you like, in the “polluter pays” jargon.

- Q43 **Julia Buckley:** It is quite an effective way to approach it. While we are talking about “polluter pays”, under regulation 23(2), if there is a happy alignment between a site that would require the nature fund and interventions or funding from other Government funds, that reduces the requirement. How can we ensure that developers will not use this to offset and reduce their requirement, which would effectively mean that state funding—taxpayers—would be subsidising developers?

Marian Spain: This will be tested. This is why we will consult on the EDP to check we have got that right. To use the current draft EDP as an example, it has looked at the impact that the volume of houses we expect to be built will have and then at what is already in hand to offset that impact—for example, investment in sewerage upgrades—and then the EDP deals with the residual harm. Nobody is paying twice, but we are not expecting the developer to pay for the sewerage upgrade, as it were. They are paying for the additional impact that they will have.

- Q44 **Julia Buckley:** It feels like all polluters pay, but some pay more than others if they happen to be in a lucky spot.

Marian Spain: I am not sure I can answer that without thinking of a worked example. I guess the other thing that we see is, again, an example of thinking about the system and about nature—

- Q45 **Julia Buckley:** Thinking about a farm, an ELM project or an SFI project, a landowner could say, “Well, I’m already getting ELM money, so if I put housing on the rest of this land, I will have less to pay on my nature fund.” So how do we stop people playing the system by submitting applications where taxpayers are already funding some of the nature recovery? The Government are already funding some nature recovery

every year—

Dr Juniper: Are you suggesting that the landowner then does something else with the land where the improvement has been?

Julia Buckley: Funded by taxpayers.

Marian Spain: That is part of the system.

Dr Juniper: This is the system. We rent outcomes, basically—we do. We own relatively small amounts of land as a public body, and most of the rest of Government has relatively small amounts of land that it makes decisions over. So instead of owning land, we rent outcomes from those who do. We pay them for a period, and they will do some good work. After the scheme has ended—this one is actually longer; the Nature Restoration Fund requires 100 years' worth of guaranteed improvement. But if you are in an SFI or countryside stewardship, then it is shorter-term—

Marian Spain: Five years.

Dr Juniper: Five years, yes. And after that, you can do—

Q46 **Julia Buckley:** They are still liable for the net 95 years required.

Dr Juniper: Yes, for the EDP.

Q47 **Julia Buckley:** It's a question of sequencing, isn't it?

Marian Spain: Again, it is a question of thinking about the system. There was another issue that we came up against when we had to deal with the problems that led to the nutrient mitigation scheme. What we were seeing there was that the developer was not necessarily the root cause of that watercourse being in poor condition; they were almost the marginal additional impact. As Natural England, we did not have regulatory levers on the water companies and their impact on water; we did not have regulatory levers on the farmer. The only lever we had was to say that development should be held until you have been able to create enough environmental headroom. I think that is an ongoing conversation for Government.

It is a slightly different one from whether a developer should fund the impact—putting right the impact of their development on nature—because, again, that is a long-established principle of planning law. But I think there is, again, a systemic question, which will be a judgment for Government, about how much environmental improvement should be funded through the public purse through schemes like ELMs, whether there should be more regulatory levers to require the right thing to be done, or whether the private sector—through, for example, developers or others that need that service—should pay. However, that is a matter of Government policy.

There was a strange irony with nutrient mitigation, in that we were using one source of Government funding to stop land being farmed where it was impacting on water, but elsewhere farmers were still being rewarded for carrying on with farming practices that were impacting on water.

Q48 Julia Buckley: So it is apportioning “polluter pays” to different criteria, but they fall across two different Departments. We come back to your systemic question that one set of funds is coming from DEFRA and another set of planning enforcement is coming from MHCLG. How confident are we about that systemic question or that alignment? How can you reassure us, or what recommendation do you want in order to ensure, that the alignment conversation is happening across those two Departments?

Marian Spain: That is perhaps an example of one of those pieces of advice we give to Government, to the different Departments and to the Departments collectively. Ultimately, it is a political matter for Government.

Dr Juniper: This might be one of the things that you would want to reflect on as a Committee.

The only other thing to add to that part of the conversation might be around another Government policy objective, which is to get more finance from the private sector for nature—so-called green finance. This is going slower than most of us would like. However, it is important to say that where the money is flowing, it is because there is a regulatory requirement lying beneath it. In terms of money going into nature recovery from biodiversity net gain, nutrient mitigation, district-level licensing, with all these things, in the end, there is private sector money going into nature recovery, but it is a legal requirement that is driving it, rather than a voluntary market. That is not to say voluntary markets are not helpful; they could be really very important. At the moment we are seeing quite slow progress, and where we are seeing progress, it is the law that is driving it, which might be something to reflect on for the future.

Q49 Julia Buckley: That is something we could underline in our recommendations to Ministers.

Moving on to a different topic, the Committee has some concerns about how independent Natural England can remain, because of the different roles you have in administering, delivering and regulating the restoration fund. How have you addressed those concerns?

Marian Spain: Particularly in relation to EDPs, or do you want us to think more broadly?

Julia Buckley: Broadly in terms of the fund, because you are giving advice on planning applications, from which funding will flow. It might be very attractive, might it not, to—

Marian Spain: No, definitely not. I think you are absolutely—

Julia Buckley: How do you assure us that these are separate roles?

Marian Spain: I suppose there are three versions of reassurance. One is that we are required to hold and account for the nature recovery fund completely separately, so we will have to do that in our in-year reporting to Government, setting out how we are holding and using those funds. It



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will also be a new section in our annual report and accounts, which are laid before Parliament, of course. There will be a very clear ringfence on how that money is used and spent. We cannot use it to cross-subsidise any other part of Natural England's work.

On the second part of your question, in terms of the way the fund will work, we will establish the EDP and administer the fund. If a developer signs up for the fund, he effectively gets a certificate from us that he uses with the planning authority to show that he has met his environmental obligations. The planning authority is still the ultimate decision maker as to whether that planning application goes ahead. If Natural England had a view on that planning application, it would not be on whether it was compliant with the EDP. There may be another issue with which we got involved, but I am finding it hard to think of an example of a scenario where that could happen. Our roles are quite separate. I think there has been some fear that it might be tempting for us to let development go ahead because we can see an income, but that is absolutely not possible.

Q50 Julia Buckley: It is not just that you can see an income, but that you might be pressured by Government to—as you answered in the last question—consider where the money is flowing and where it can be increased, in the current fiscal environment.

Dr Juniper: We face pressure on multiple subjects all the time, I think it is fair to say. We seek to do our best in retaining an independent voice and reflecting the law.

Q51 Julia Buckley: I have a final question on that. These regulations would allow Natural England to depart from the mitigation hierarchy where that is considered appropriate and value for money. Where should the line be drawn between adhering to or diverting from the mitigation hierarchy?

Marian Spain: Again, the regulations define this for us. I tend to think that we are not departing from the mitigation hierarchy; we are conflating it. We are able, under the EDP, to look at compensation and mitigation in the round and as a whole; it is not always the best outcome for nature to hold to the mitigation hierarchy on a single site. One of the reasons why we favour strategic solutions and why we supported the principle of the EDP is that, for a number of developments, the impact that that development is having is cumulative and additive and cannot be adequately mitigated by the individual developer. By being able to say we can look at the collective impact of development on a series of watercourses, we can then have a range of measures that compensate and mitigate, and are additive as well.

I understand why people are concerned, because those of us who have worked in nature conservation for as long as Tony and I have grew up with the mitigation hierarchy, and it is a logical, sensible thing. But this does not depart from it; it is a different way of applying it. It is a principle we have used a number of times on other strategic solutions, major developments and so on.

Q52 Julia Buckley: Where is the backstop? Where is the point at which we



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say, "We're going to have to mitigate that in a different location"? Where is the point at which you say, "But we can't allow that much deterioration"? There must be a critical point beyond the point of repair—

Marian Spain: Again, that is what the EDP does.

Dr Juniper: If we cannot conceive an EDP that will deal with the problem, you cannot do it—you will not have an EDP, and therefore the law applies.

Marian Spain: Again, water quality is a relatively easy one, because we can see the catchment and the different additive effects of development across the catchment. We can manage the catchment to deal with the impacts—not necessarily each individual house and bit of river.

I absolutely get the concerns, but we truly believe that this is a better solution for nature. What we see at the moment is piecemeal compensation and mitigation that does not necessarily add up to the sum of its parts. I think the other safeguard for the EDPs is the overall improvement test; the "improvement" word is significant. So we are mitigating, compensating and recovering across the area of the EDP.

- Q53 **Julia Buckley:** There are sometimes well-intentioned things that could, in theory, be better overall. As legislators, we always have to think about the worst possible thing that could go wrong. When your successors come along, what is the worst decision that they could make with this new freedom that they have been given? How do we protect against that, and how do we make sure that the wording is tight enough that this well-intentioned stuff can go on, but that there is some kind of backstop?

Marian Spain: Ultimately, it is exactly as Tony says. There are the legislative backstops of the definition and the legal interpretation of that definition, and the role of the Secretary of State in ultimately deciding. There is also the backstop that we and our successors first need to satisfy ourselves. Our board have been satisfied with this, and they will make that decision case by case. As Tony said, there are situations where we cannot conceive that an EDP would be workable: irreplaceable habitats, significant damage or if there was simply not enough land in an area to deliver. The EDP defines by hectare the amount of compensation we need—not site by site but overall. Again, if we found that we had an area where we could not be confident that land could be found, we would not make the EDP.

- Q54 **Jonathan Davies:** To follow on from the questions we have had about the Planning and Infrastructure Act, and to summarise your position, if I may, you think it is a piece of legislation that quite adequately balances the importance of nature as critical national infrastructure and the economic benefits around nationally significant infrastructure projects and housing. Is that accurate?

Dr Juniper: It does not have the infrastructure piece—nature as infrastructure. That is not there. But what it is seeking to do is to make it easier, quicker and better for people to navigate the habitats regulations requirements effectively. It is mostly that.



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Marian Spain: Part of that other conversation is that it has not removed the habitats regulations; it has given developers a different way of discharging their obligations.

Dr Juniper: Yes—easier and quicker.

Marian Spain: I think that is why we are confident. We have not lost the fundamental protection. Of course, if a developer chose not to participate in the EDP, but still wanted to develop, they would still have to do their own mitigation and compensation.

Q55 **Jonathan Davies:** Do you think it would be better if the EDPs were not voluntary or lasted for 10 years? Do you think it would be better if they were mandatory in certain circumstances?

Marian Spain: There is the option to make some mandatory. Again, I will not give an off-the-cuff example of that, but the legislation does allow for mandation.

Q56 **Jonathan Davies:** To support the Committee's role in holding the Government to account and encouraging them to go further where necessary, where do you think we should be most mindful of weak points in the legislation?

Marian Spain: For the Planning and Infrastructure Act, or more generally?

Jonathan Davies: Yes, in planning and infrastructure.

Marian Spain: I think that is about continuing to test the overall improvement test. That is the ultimate bar that we have to meet to create an EDP.

You will also be aware that one of the commitments that was made during the passage of the Act was that we would not proceed with the species EDPs until we had first been satisfied that they worked for the habitat-level ones, the water quality ones. It is easier to see the concept of a habitat-level EDP, where, as I have already said, you are talking about a catchment and the cumulative impact. It will be harder for species. It will be harder for some species, where they are less mobile and less adaptable. It was relatively easy for newts: putting it bluntly, a newt just needs a pond, and it does not even have to be a particularly big or particularly nice pond. But for more specialist species, the test will be harder. That is why Parliament asked Ministers to go back and give Parliament confidence that we had tested the concept. That will be an important point. I would imagine that this Committee might want to look at that review point for the EDPs.

As I have already mentioned, the other thing is that we need to give the Secretary of State notice of the EDPs we intend to make. We have so far given notice on nutrients and newts because we are confident that the concept will work there. You may want to ask us, or our successors, what the next round would be, which we will be thinking about in a year or so.



Q57 **Jonathan Davies:** Can you give us any sense of when we might be able to diarise that an assessment has been made of the efficacy of the first round of EDPs?

Marian Spain: I would have thought at least a year. We are about to consult on the first one. We are conscious that we will get a lot of reaction to that consultation, because we are testing both the concept and the specific. We are not yet giving a definite date for when the first EDP will be ready, but I would imagine it would be next calendar year at the earliest. That is my best estimate. We are not yet committing. Then, it will be another six months or so, as we write the next round of EDPs, so I would have thought it would be a year or so from now. But that is me thinking ahead, not giving definite commitments on timings.

Q58 **Chair:** Can I ask you to clarify? Putting to one side any kind of growth agenda that the Government have, is it your view—I think it is—that the EDP approach is actually better for nature, regardless of whether it leads to more development or not?

Dr Juniper: Yes, it should be.

Marian Spain: In some circumstances, yes. We have used it in the past for recreational impacts. We have used it for water quality, and we are hoping to use it for air quality—so definitely where there is cumulative, diffuse pollution that an individual developer could not deal with, and, as I have said already, for relatively mobile, relatively generalist species.

The other thing I would say—without confusing us all completely—is that even without an EDP, we, a developer and a planner can still come up with a form of strategic solution. We have already been using the concept; that is allowable under planning law anyway. We gave an example earlier about Sizewell C. That is exactly what Sizewell C has done: it has looked at the overall impact that its major development has had, and it has looked at restoring, mitigating and compensating nature across its red line and beyond its current land ownership. It has gone so far as to buy new land that it did not need for operational reasons, in order to discharge its environmental obligations. That is an example of the concept that is behind an EDP working, without Natural England and the Government having to write the EDP. The developer has done that. We were satisfied that it met its requirements, and it satisfied the NSIP decision-making process as well.

Q59 **Barry Gardiner:** You adverted to the injustice or difference where, if a developer were trying to develop a site, they would be stopped in the planning process because it was the straw that broke the ecological camel's back. Perhaps the water company had failed earlier in the process, meaning that this additional development should not go ahead. Should the developer then have a right to sue the water company? It is being disadvantaged.

Dr Juniper: Good question.

Marian Spain: The answer is no—not under the current regime.

Barry Gardiner: I did not say “could”. I said “should”.

Marian Spain: The other scenario where this example comes up is water resources. We have seen examples in Cambridgeshire and Sussex where either we or the Environment Agency had to say that there is not the environmental headroom. That is the point we are talking about. We know that the Government are seriously looking at water reform, a forward programme of water investment and how quickly we can accelerate the environmental headroom that water companies are obliged to deliver. Water companies have a programme agreed with Ofwat on behalf of the Government. The concept of saying that they have failed would be stretching the reality a little bit. They have done what they were obliged to do by the regulators, but that does not mean it is necessarily—

Q60 **Barry Gardiner:** They have broken their statutory obligations. Let’s be clear about what the water companies have done.

Marian Spain: The point I was making is that, in the system at the moment, the companies agree the level of investment that they will make in both water quality and water quantity. There is a different question about whether that has been fast enough to deal with the environmental headroom. In the media this week, we have seen an example about data centres and their water demand. We could not have envisaged that 10 years ago when many of the current water company plans were being written. I should say that these are just my comments, because Natural England does not have that regulatory role in the water system. I did work for Ofwat, though, at some point in my career.

Q61 **Barry Gardiner:** I would blame them.

Dr Juniper: But not Marian. Just to add one thought to what Marian said, there are the possible benefits of looking at a catchment in terms of its overall nutrient budget and then looking for the places where you can reduce that nutrient input most quickly and cost effectively. We do not have that system. What happened with nutrient neutrality is that new houses adding new nutrients to an already overloaded system got hit by the rules, when in fact you might have stood back and said, “Look, this catchment has too much coming in. Some is coming from farming, some is coming off the roads, some is coming out of a factory, and some is coming out of the sewage works. What is going to be the way of bringing that down to a level that is ecologically sensible?” We do not have that system at the moment, but we may get there.

Marian Spain: That is one of the reasons why, in the Government’s current thinking on water reform, we have certainly been supportive of their thinking about a regional level of water planning and a level of water planning that integrates all the different impacts on a catchment and looks at quantity as well as quality—that looks at supply of water, flood risk management and water quality. We need to manage the catchment and understand the different debates. This goes back to the point we were making that, if the ecosystem is functioning, we can exploit the ecosystem without harming the fundamental service.



Dr Juniper: We are repeating things we said earlier, but this is the big step we have to make. We need to start looking at entire ecological systems at scales that make sense. The most ecologically rational scale is a river catchment, because that is where most of these processes are ultimately unfolding. If we wish to reduce flooding, reduce pollution, maximise food security, catch carbon, provide places for people to enjoy and recover nature, doing it at catchment level is the way to do it. We do not, by and large, plan everything in an integrated way at that level, but we could do better.

Q62 Blake Stephenson: It is almost as though we planned it, because my questions are on flood resilience, catchment and budgets—I think it was entirely coincidental. The Committee has recommended that catchment-based planning should become the default approach to flood resilience—funny that—and that nature-based solutions should play a much greater role. Will you walk us through what Natural England's role is in making that happen?

Dr Juniper: We have experts embedded in our organisation who look at natural flood management, as nature-based flood management is one of the things that we advise on. Of course, that is but one aspect of what nature can do in terms of building climate change resilience.

The Climate Change Adaptation Sub-Committee has told us that we face four big challenges in the United Kingdom: one of them is flooding, one is heatwaves, which we have just had a taste of, another one is drought—we have still got one—and the other is fire. Those four things are the headings where we can see that we have vulnerability and we are now beginning to experience it.

The big exam question for us is to work out where we can most effectively insert nature-based solutions to reduce the risk of all that and to increase the resilience of the country through doing so. At the same time, from our point of view, we need to lift up the prospects for nature's recovery in terms of biodiversity.

You could imagine a river catchment with some headwater rivers that are pretty spatey—where the water is running down steep hills into the top of the river and then running downstream and hitting a town. You could then begin to think through how we can delay the progress of that water and recreate wetlands so they will hold it for longer. In so doing, you reduce the severity of a flood spike—you can smooth it off—and you will keep the river flowing during hot, dry spells in the summer as the landscape is still shedding water because it has been retained there. You will probably catch more carbon if there are peatlands in that landscape and, of course, by being wetter and more humid, you will reduce fire risk.

But you have to take a catchment view to be able to do that because water does not know any boundaries. Hydrology needs to be looked at in the context of a catchment. This is not only about ecology; it is about planning and land use planning, and how we line up all the incentives and the tools that we have to encourage people to go in this direction.



Q63 Blake Stephenson: Would you be able to walk through what you can practically do? I think we get the theory, which is why we have the recommendations. What are you practically thinking of doing?

Marian Spain: This is one of the areas where our advisory role is at the front. We are not the regulator. We have a small delivery role, which I will come to in a moment. In our conversations on the DEFRA water reform and looking ahead to the next price review—the one that is about to start very soon—our role is to advise on the investment and actions that are needed by water companies to further nature recovery.

A few years ago, our conversations there would mainly have been about the impact of water on protected sites, where there was actual harm being done and an outflow needed upgrading, for example. In the last two rounds, and especially for the next one, we will look at the much broader questions: where do nature-based solutions help and where do they not work? They do not work for everything, so where are they the most appropriate and cost-effective measure? Also, how are we looking at wider water resilience? We have an advisory role to the water regulator and to the Environment Agency about when nature-based solutions work best. We have a small direct delivery role in the work we do with farmers on catchment-sensitive farming and supporting farmers to change land management practices and receive funding for that through things like the higher-tier scheme and capital grants.

As I have just mentioned farming and while we are talking about water, the other thing we are increasingly looking at—we are just kicking off a piece of research with CEH to test that we have enough knowledge on this—is the other side of water quality and what practices could change on farms, on both flooding and water quality. We all know that better quality soil holds more water and therefore creates flood resilience. It holds and stores water, rather than the water washing off. We have seen that especially this summer; the drier soils are more likely to have flash floods. That is a piece of evidence we are starting to really test that we have sufficient robustness in to make sure that that is factored into the next round of the price review. It is not just what the companies do; it is other land management in the catchment.

Q64 Blake Stephenson: I have a question on farming in a second, but before we move on from the catchment, you reflected on the challenge of doing this at scale. What can you do to overcome the challenges of implementing at scale? By the way, if you need any pilots, I am more than happy to host you in Mid Bedfordshire, because there is an appetite for nature-based solutions and to consider the catchment. With huge amounts of development in Bedfordshire, there are real opportunities.

Marian Spain: I am not sure we would necessarily call them pilots, but over the years we have gathered that knowledge through the projects we have been involved in. Some of those might not have been labelled a water project—they might have been a nature recovery project—but we have learnt from them which solutions work and which do not. We have



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learnt it through our work with water companies and, as we said, we are learning it more through our work with farmers.

The other aspect that came to mind when you mentioned Mid Bedfordshire and that we must not forget—forgive me; I am not suggesting you do—is the urban side of this and the use of sustainable urban drainage and things like that. Water resilience in built development, as well as on farmland, will need to become part of catchment planning.

Q65 Blake Stephenson: Yes, 100%. It is about considering development holistically because unfortunately, at the moment, it is considered case by case. We have classic examples where cumulative impacts of development have had catastrophic effects—but I am digressing.

On the farmers' side, the NFU has raised concerns with us that environmental permitting gives too much weight to the immediate ecological effect of maintenance, rather than the wider consequences if flooding occurs. Do you recognise that problem, and if so, what is the solution?

Marian Spain: It has not raised that with us, perhaps because we are not the environmental permitting body.

Dr Juniper: It is more EA, possibly.

Marian Spain: What we are seeing in our conversations with all the farming bodies and individual farmers is a growing recognition of some of the things our strategy talks about—that an environmentally resilient farm is also an economically resilient one, and it therefore contributes to food security. We are seeing more farmers understanding that it is not about nature because they want more nature on their farms, but about nature as a business solution.

Q66 Blake Stephenson: My final question is about budget, because at the end of the day everything is about money. The Minister told the Committee that the new flood funding formula should make it easier for natural flood management schemes to secure funding. Have you seen evidence of that? Are there barriers that remain, from your perspective at Natural England?

Marian Spain: It is work in progress. We are working on that ministerial commitment with the Environment Agency. It is an example of what I said: we are testing where it really is the most cost-effective solution.

Blake Stephenson: These are early days.

Marian Spain: Yes, but that commitment is definitely being seen through, and we are part of it.

Dr Juniper: Let me say one thing about regulation and things that look like they are ecologically a good idea not being that easy to do. It arises, in some ways, from the regulations that have been put in place to stop bad things happening to nature rather than to foster good things happening.



An example I saw recently in East Anglia was Anglian Water seeking to put naturalistic wetlands downstream from some headwater sewage works in remote rural areas—serving maybe 600 houses, so quite small sewage works. It is quite expensive to upgrade them, yet they are causing quite a lot of harm to the rivers. Putting a wetland downstream of the sewage works makes a lot of sense ecologically. However, the regulatory regime does not make that easy because the EA needs to regulate the water flowing out of the pipe at the end of the sewage works, rather than the Perrier-quality water that is coming out of the bottom of the wetland.

There are issues we could probably work through to make it easier to deploy nature-based solutions. That regulatory piece is one barrier. Another is the extent to which we are not so able to judge risk in relation to a nature-based solution, because nature is unpredictable compared with concrete and steel, the effectiveness of which we can engineer and be far more confident about.

Regulatory and risk-appetite issues do lie in that nature-based solution space. More work probably needs to be done on that so that we can unleash those solutions more comprehensively.

Q67 Blake Stephenson: If you had recommendations for this Committee on improving those regulations, would you share them with us?

Marian Spain: We possibly have, and we will continue to. I think you have heard some of that today. It is about thinking about the health of a catchment and the combined impacts on it, not, as Tony just described, solving a point-source pollution problem that does not necessarily create a healthy ecosystem. A lot of that regulation has been based on human health thresholds, not environmental thresholds. That is part of the advice we are giving to the Government as they think about a water Bill: do we need to change any regulation as well as the regulators?

Q68 Sarah Gibson: Moving slightly away from one of the areas you discussed as being our most threatening, going from water through to heat and heatwaves—the other extreme—in January 2025, you introduced a protocol for dealing with the impact of drought in your nature reserves and sites of special scientific interest. How has that protocol worked over this summer, and will you make any changes as a result?

Marian Spain: On the back of this summer we are doing immediate work, not so much on drought, but on wildfire risk, although, of course, they are related. We are doing an immediate rapid assessment of the fire risk assessments on our nature reserves. They will not just be—if I might call it this—the health and safety version. We are also working together and have pulled together a group of practitioners—ourselves, other ENGOS and other parts of Government—to see what we can learn quickly from this summer. Putting it simplistically—well, we were due to visit Minsmere with the RSPB, anyway, before the fire happened. We visited and used the opportunity to learn a lot more. We saw fire risk assessments that were good enough a year ago but were not good enough this summer because of the heat and the speed at which the fires were moving. Many of us have

worked to those same principles. We have firebreaks that we thought were good enough and they simply aren't.

The second learning we had from this summer is that we need to make the sites more resilient by building in more water, having more variety of vegetation and so on, so that there are more natural firebreaks, more wetland, and not a single monoculture. Even if it is a heathland site, heather alone is not what we need. What we also learnt from the time we spent with the fire service there and when there have been fires on our reserves is that we also need to think about the ability to respond to a fire. We have to assume that more will happen, however resilient the sites are, so can we get the rapid response in? And the third piece of learning is: what do we learn about how best to recover sites after a fire?

Our chief scientist led a piece of work for the Government Office for Science on the impact of fire on biodiversity. The loss of the habitat itself is significant, but the fires also add to risks to water quality because of contamination flooding off the land. The carbon release in the first place and the fact that we have then got dry, bare ground means flooding is more likely. So I think that in some of the places where we have had fires this year, the problems are not yet over.

That was a very long answer, but we have to look at the whole piece. How do we prevent fires? How do we deal with them better? That does not just apply to us; it applies to our partners with private land as well. Both upland and lowland farmers have had the same problems that we have seen on the nature sites. We want to be able to share that learning on what makes land more resilient and what makes responses better.

Q69 Sarah Gibson: Thinking about the areas that have not been subject to fires, but just the heat itself, what impact have you seen on biological diversity, and what are you going to do to try and protect areas?

Dr Juniper: This goes back to the very big picture to which our strategy is pointing, which is about creating resilience for nature as well as for the human world. We know from previous reports presented to Government some years ago—especially the “Making space for nature” report from Sir John Lawton—that if we wish to have nature flourishing into the future, we need more areas of natural habitat. They need to be bigger, better quality and connected. That is behind a lot of what we try to do at Natural England. That is the big picture, and this is work in progress. Progress is being made here and there, but it is fair to say that the impact of this summer on our wildlife will be profound.

In the summer of 1976, which was not as bad as this one, some butterfly populations were knocked back for decades after that extreme event. This summer, anecdotally—data will emerge in due course—far fewer insects are around. Obviously, some aquatic habitats have been completely wrecked. A lot of ponds and shallow lakes have completely dried up. Fish and insect populations in those will have been wiped out.



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When we saw the fire at Dunwich heath, we were told that one place was the location of a population of silver-studded blue butterflies. Those insects do not move very far at the best of times, and the entire population was wiped out by that fire. How is it going to recolonise? Well, the next colony may be some distance away, and so on and so forth. That is now going to drive even more pressure on to our beleaguered natural environment. We really have to start thinking not only about individual sites and making places hold more water but about landscapes. As a country we must invest in more, bigger and better-connected natural habitats. We have quite a lot of tools to do that, and we now have quite a lot of extra reasons to do it, including this climate change impact, which is not only affecting the natural world, but people. Bigger areas of natural habitat, holding more water at catchment scale—that needs to be the direction of travel.

Q70 John Whitby: Sticking with heat, what role is Natural England playing in helping us to adapt to heat? What role can nature play?

Dr Juniper: Do you want to talk about Nature Towns and Cities?

Marian Spain: Yes. I am conscious that we have not talked much about people during this hearing so far. In that helpful exchange, we talked about what we might do to protect nature on more natural sites. The other area we have invested a lot more in over recent years is what we can do to make urban areas more nature-resilient. Covid was a bit of an eye-opener for many of us, wasn't it? People who have the least access to green space suffer the most. We have seen quite a lot of data about the inequality of access to green space, and that evidence correlates with the people who are most likely to suffer the heat impacts—the communities that are less likely to have green space.

The Nature Towns and Cities project that Tony mentioned is a partnership between us, the National Lottery Heritage Fund and the National Trust. It is about supporting local authorities to invest in nature resilience in their towns, with more green space, more street trees and more rain gardens, which help contribute to flood risk mitigation. It is enabling and supporting capacity and capability in local authorities. The reason that matters is that we know that water, green space and shade all mitigate heat, directly and indirectly, but we are also seeing through that programme and the research and evaluation around it that it is beneficial to economic growth, because you are more likely to visit a city centre that has pleasant green spaces, you are likely to stay longer and therefore you are likely to spend more. A lot of that is about reinvestment in city centres.

Q71 John Whitby: Is it also about reducing ambient temperature?

Marian Spain: Definitely.

Dr Juniper: Big time. There is a lot of data on that.

Q72 John Whitby: And that goes for the green infrastructure framework as well?

Dr Juniper: Yes.



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Marian Spain: Yes. That is a piece of Natural England evidence that local authorities can use to understand where best to target their effort. That effort may be the obligations that they put on developers for alternative green space, or it may be their own investment. Greater Manchester combined authority was one of the first authorities to use it, and it was used to target where the mayor's green fund would fund community projects to create green spaces and nature.

Dr Juniper: What that revealed is actually quite an important point in terms of the social wellbeing agenda. That work revealed how the people with least access to green space within a short walk of their home were the people who would benefit from it most: people on low incomes and people suffering from indices of social deprivation. We know that access to nature does help with some of the challenges faced by some communities in terms of health and wellbeing. The benefits gained from green space make a material difference to that, but the people who have the least of it are the ones who need it most. There is quite a big social question in there about how we expand access to green areas, including in ways that are going to reduce heat extremes and help to mitigate flooding in towns. It all comes together in the end around the use of green infrastructure in towns and cities in a way that is presently not very strategic in some cases but could be more so.

Q73 **John Whitby:** You previously mentioned larger spaces, and some of them are well connected—half of my constituency is in a national park—and with all the heat, people are probably going there in even greater numbers than previously, because it is a bit cooler. That creates other threats. We have had fires from wild camping, barbecues and all those sorts of things. How do we protect our natural spaces from those sorts of threats?

Marian Spain: I think it is a version of bigger, better, more joined up, isn't it?

Dr Juniper: Yes, bigger, better, more joined up and a bit wetter—that makes it less likely to burn. In the wake of this summer, I think there is a major public awareness piece about all this. I think pretty much all the fires, the fire brigades would tell us, were started by people, most of them probably accidentally and some of them deliberately. The deliberate ones are obviously criminal acts, but can we do more to reduce the risk of fires being started accidentally by giving people more knowledge? The alert that went out on the phones seemed to make a difference that weekend. There were fewer new fires that weekend, which I think says something.

Chair: We were told today that there was a 42% reduction on the previous week.

Dr Juniper: There we are. That says something about public knowledge and awareness, doesn't it?

Q74 **Adrian Ramsay:** You have talked about nature being critical infrastructure that is central to national security. We had the Joint Intelligence Committee report on the national security assessment earlier



this year, which this Committee investigated and scrutinised with the DEFRA Minister. What is your assessment of the Government's response to that national security assessment? Have they reacted adequately and comprehensively enough to the threats to national security from nature decline?

Dr Juniper: I am not sure that I have seen a response to it. Obviously, it was a cross-Government endeavour to reach those conclusions. From what we know at Natural England, and certainly from what I have seen from other work I have done over the years, there is a very strong set of aligning factors between national security and the state of ecosystems, and that report did a good job of looking at issues of mass migration, political destabilisation, the rise of bad actors and the impact on supply chains. All those things were brought out very well, but I am not sure that I have yet seen a response that sets out the reaction to all that.

Certainly, in what we are doing in the UK, one way in which we can take down some of the risks of damage to ecosystems in different parts of the world is to look after and repair our own ecosystems so that we can rely on them for more of the things that presently we get from overseas, food being the obvious one. Ensuring soil health, water security, pollinating insects and green infrastructure in the landscape to enable it to function in a way that is going to meet our needs is a logical conclusion that we take out of that global picture, but I do not know if I have seen yet a comprehensive piece that says, "This is what we are going to do." Have you, Marian?

Marian Spain: I think that our particular contribution is the one that we have been talking about during this session. How can we, as a delivery body and an adviser to Government, build that resilience? An example of that is the work we do in delivering the Government's peatland restoration grants. They are a major part of delivering that resilience in upland areas. They help deal with fire risk, flood resilience and water quality. In our first meeting with the new Secretary of State for DEFRA, Dame Angela Eagle, that was what she was particularly focused on: how could Natural England contribute more to building that resilience, security and climate adaptation?

Q75 **Adrian Ramsay:** I am glad you have had that discussion with the new Secretary of State. When we had our discussion, albeit with a now former Minister, my view was that the Minister's reply did not constitute a full response to the gravity and scale of what the national security assessment said. She referred to specific actions being taken in particular areas and some good work but, like yourself, I did not feel that it was a really thorough reply. That has perhaps given us the impetus to pursue that further.

Dr Juniper: Indeed.

Adrian Ramsay: What would you like to see in such a response?

Dr Juniper: Our participation in global efforts to halt and reduce deforestation. The UK was a global leader in that field 15 or 20 years ago.



We could return there and work with partner countries. I remember us having a very good relationship with the Norwegian and German Governments and being able to take forward plans that turned into quite a big ambition on the global stage. We could re-engage with some of that. Obviously, there is the global biodiversity framework and what we can do to support other countries in the implementation of that.

But as is the case on climate change, there are always big questions about what we are doing at home: what leadership example are we setting in order to show that you can restore ecosystems in ways that are good for growth, good for public health and wellbeing and good for national security? That is where we might be able to really blaze a trail in helping countries to see that that false choice really is a false choice, and that you can restore your habitats in ways that help your country.

There are one or two good examples around the world. Costa Rica is a great example. It has more than tripled its forest cover in 40 years and it has doubled its GDP per capita at the same time, so it has restored its ecosystems in a way that has helped the country to reduce poverty and develop. It did that by taking an approach that is very much reflected in the evidence, but it turned it into policy. It recognised that if it wanted to have secure hydroelectric power, it would have to keep raining, and it would keep raining only if it kept the rainforest—Costa Rica worked out that those two were connected—so it did that. That turned into not only a source of electricity but a source of clean water that did not need to go through a water treatment works because it was coming absolutely pure from the forest. On top of that, it developed a world-leading ecotourism industry, and at the same time it has increased its food exports. Is there an opportunity for the UK to show that kind of leadership in taking nature as an opportunity for national security and development rather than seeing it as an imposition or a distraction, which unfortunately is sometimes where we have been?

Q76 Adrian Ramsay: Indeed. It is interesting that you talked about food resilience in your example, because that was a big theme in the national security assessment. What are the principal things that need to be done, from a nature point of view, to increase our food resilience in the UK, given the vulnerabilities of international supply chains that the report highlights?

Dr Juniper: It is probably about the soil, which, in the end, is sustaining our food supply, and focusing there, as Marian said, in ways that give us greater ability not only to sustain food into the future but to store water in the ground, helping to reduce flood risk. There are plenty of farmers across the country who have now embarked on this regenerative agriculture journey. If any of you have the time next summer, I would strongly encourage a visit to the Groundswell farming festival in Hertfordshire, where there is the most incredible level of knowledge and expertise among practitioners, who are now putting into real effect these ideas about focusing on soil as a means of achieving so many other things.



One thing that you can get by improving natural soil fertility is to reduce reliance on long-distance supply chains for fertilisers. Access to ammonium nitrate from global markets has gone from being a theoretical thing 10 years ago to now being a real, material factor for farmers. In fact, I heard of one farmer this year who made more money out of selling some spare fertiliser he had than he did from growing crops, such is the volatility in those markets now.

If you were to conduct an investigation into regenerative farming, you could get a great deal of expertise from people who are already doing this. We are advisers on nature, and I think you would get much more wisdom from the farmers who are actually on this journey.

Q77 Adrian Ramsay: I intend to go to Groundswell next year. I have one last question. Given the crucial nature of these issues around national security, do you think that Natural England is treated by the Government as a body that is responsible for national security, public health and economic prosperity?

Dr Juniper: There were some raised eyebrows when we published our new strategy, "Recovering Nature for Growth, Health and Security", and some people were slightly quizzical. Things have moved on in the short 18 months since we published the first draft of that, and people can now see the connections, but there is work to do in embedding this across the piece.

The piece about nature being infrastructure is where some of this would logically land. If it is about restoring nature for these big national objectives, we will have to put it in a different box from where it currently is, which is a little bit of DEFRA. It seems quite distant from the NHS and what we are doing in terms of defence reviews and everything else. In fact, if you put it in those contexts, it can be of great assistance in enabling us to navigate some really quite big subjects.

Marian Spain: Our work transcends a number of Departments that you might not expect us to be working with. As a small example of that, we are doing some work with DWP in jobcentres in the north-east about whether—I should not call it green social prescribing—using nature and having more green space helps to keep people fit and well and therefore more likely to be able to find work. It is partly about people's health and wellbeing; it is also about their confidence. We did some work recently with a charity that was using nature volunteering to give young people—particularly those who had been isolated during covid in the last part of their schooling years—the confidence to take their first step into the workplace. That idea that nature can also help people's personal prosperity and resilience is an increasing part of the narrative.

Forgive me, I am trying not to go back 70 years, but having worked in this world for 40 years, I am about to finish, and I am reflecting on what has changed in my working life. I made a comment about this at the beginning, and I might just return to that. The legislation that we work to still assumes that the job is to protect certain places and certain species; it



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is very much about stopping bad happening, because that is what we needed a couple of generations ago. That is the other thing that, if I dare, the Committee might want to turn its mind to. What do we need in the future? Where do we need to continue to evolve our regulation and our legislation to drive good things, to drive recovery and to drive positive change, rather than just stop harm? We have seen a few bits of that; the Planning and Infrastructure Act takes us that way and Tony mentioned the protected site strategies work that came from the Environment Act.

Dr Juniper: Landscape recovery, yes.

Marian Spain: We would certainly welcome a conversation about what is next to get to a place where nature regulation is driving nature recovery and helping and incentivising good.

Chair: Thank you very much, Tony and Marian, for your contribution today and your very fulsome answers. Also, as I said at the start, thank you for the contribution you have made over the course of the last seven years at Natural England and through your careers prior to that. You go with our thanks. We wish you both well in whatever you do next.