



Rt Hon Philip Dunne MP
Chair, Environmental Audit Committee
House of Commons
London
SW1A 0AA

15th December 2020

Dear Mr Dunne,

As CEO of The Wildlife Trusts, I was delighted to have the opportunity to give evidence to the Environmental Audit Committee's Biodiversity and Ecosystems inquiry on 12th November 2020. Following recent announcements from the Government, including the Prime Minister's 'Ten Point Plan', the 'Path to Sustainable Farming' publication, and the Spending Review, I wanted to provide the Committee with some additional evidence which I hope will be beneficial to your inquiry.

Investment in biodiversity and ecosystems

A key necessity for improving the state of our biodiversity and ecosystems is adequate funding. However, according to the 2020 biodiversity indicators report, public sector investment in biodiversity has fallen in real terms by almost 34% over the past five years. I was therefore pleased to see the Government's 'Ten Point Plan' commit a further £40 million for nature recovery projects, bringing the Green Recovery Challenge Fund to £80 million. But, with nearly half of all species in steep decline in the UK, the Government must realise this is not enough to meet the scale of the task ahead.

Professor Sir John Lawton wrote to the Government this September calling for £1 billion of funding per annum to reverse wildlife decline and kickstart nature's recovery – we need ambitious investment of this magnitude if we are really to set the UK on a path to a green recovery. It is also difficult to reconcile the £80 million of funding for the environment with the £27 billion announced for roadbuilding in the Chancellor's Spending Review last month. Not only is there disparity in the sums given, but the highways project will threaten valuable habitats that could be helping to reverse wildlife declines and store carbon.

Lastly, as we move towards the end of the Brexit transition period and develop a new environmental enforcement structure, the Government must ensure those bodies tasked with protecting our natural environment are properly resourced. The trade union Prospect has recently warned that Natural England has been "*cut to the bone*", with funding decreasing by over 67% since 2008.

Incidents such as the recent destruction of habitats on the River Lugg in Herefordshire will be an important test case for the Government's promise to be a world leader in environmental protection. Without stepping up resourcing for Natural England and the Environment Agency, as well as a truly independent Office for Environmental Protection, incidents like these will occur with only more frequency.

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Achieving 30% by 2030

It is important that more land is specifically protected for nature. I know the Prime Minister himself committed to the leader's pledge of putting 30% of our land and sea into nature's recovery by 2030. However, at the time of this announcement, Downing Street suggested that 26% of land is already protected for nature – this is far from the case. The 26% figure includes National Parks and AONBs - these are landscape not wildlife designations. Many of these places are severely depleted of wildlife because of overgrazing, poor management or intensive agricultural practices and won't deliver the recovery of nature. In fact, on average, the condition of Sites of Special Scientific Interest (SSSIs) inside National Parks and AONBs is worse than it is outside, with only 26% in good condition.

Only around 10% of UK land is protected for nature through a SSSI designation, but around half of this is still in a poor state and suffering wildlife declines. This means that, in reality, the amount of UK land being properly managed in a way that supports nature's recovery is closer to 5% - massively changing the level of action needed to reach the 30% target by 2030. The Government must reassess its 26% measure and step up to the real challenge it faces in restoring biodiversity.

A key tool for achieving 30 by 30 and delivering on nature's recovery is through the planning system. However, we are concerned that, as currently drafted, the Planning White Paper will only make a bad situation much worse. The proposals for three new zones do nothing for nature's recovery – both the 'Growth' and 'Renewal' zones fail to integrate nature, and it is business as usual in the 'Protected' zone – and the White Paper makes little mention of how Local Nature Recovery Strategies will be integrated into the planning system. We recommend the Government amend the Environment Bill to strengthen the duty to act in accordance with Local Nature Recover Strategies when making decisions that affect the natural environment such as planning, net gain habitat enhancements, and targeted investment in environmental land management.

To put nature at the heart of planning, The Wildlife Trusts also want to see a new land designation called Wildbelt, with the specific aim of putting nature into recovery. A Wildbelt would secure the long-term future of land that is being managed to enable nature to recover and where investment is being made to restore or create new habitats, so that we can reach at least 30% of land in recovery by 2030.

Environmental Land Management

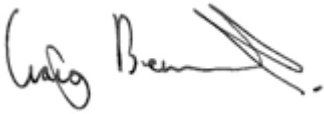
On 30th November, the Environment Secretary, George Eustice, set out the Government's plans for the agricultural transition period following the Agriculture Act gaining royal assent. While we welcome the positive words on ensuring the new Environmental Land Management scheme supports nature's recovery, progress has been slow and we still lack the detail and clarity on how it will deliver these public goods.

To ensure that farmers and land managers help the Government deliver on its promise to leave the environment in a better state, the Government must ensure that payment rates are competitive, providing financial remuneration that reflects the potential profits from a range of alternative practices, and set out how high regulatory standards,

that all farmers will be expected to meet without subsidy, will be enforced. The new Sustainable Farm Incentive must also deliver real benefits for biodiversity across tracts of the landscape. An unambitious scheme which doesn't deliver environmental gains would make the same mistakes as the Common Agricultural Policy and would not represent value for money.

I hope this additional information will be useful in informing the work of the Committee on biodiversity and ecosystems. I very much look forward to seeing the outcome of your inquiry. If you have any further questions, please do not hesitate to get in touch.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Craig Bennett', with a stylized flourish at the end.

Craig Bennett
Chief Executive, The Wildlife Trusts