



## Kent Nature Partnership statement on the government's 25 Year Environment Plan

### 1. Introduction

The 25 Year Environment Plan (25YEP) is a cross departmental plan setting out what the government will do to improve the environment within a generation, with the ambitious aim of leaving the environment in a better state than we find it now.

The 25YEP aligns well with our new Kent Nature Partnership (KNP) Strategic Priorities and Action Plan. Defra say that Local Nature Partnerships (LNPs) will be essential to the delivery of parts of the 25YEP and we have set out here a summary and KNP analysis, highlighting both positive areas and our concerns. We have also set out the implications for KNP, including how we should get involved in the next steps and consultations.

This statement addresses key areas in the 25YEP which relate to the natural environment. There are many parts of the 25YEP however that we won't be commenting on, for example, water, air, waste, chemicals, and biosecurity. We are coordinating our response with the Kent Environment Strategy Programme (KES) Manager who will ensure all the other aspects are properly covered.

The policy themes of the 25YEP are as follows: -

- Clean air.
- Clean and plentiful water.
- **Thriving plants and wildlife.**
- **Reduced risk of harm from environmental hazards such as drought and flooding.**
- **Sustainable and efficient use of natural resources.**
- **Enhanced beauty, heritage and engagement with the natural environment.**
- Manage pressures on the environment by mitigating and adapting to climate change, minimising waste, managing exposure to chemicals and enhancing biosecurity.

The themes in bold are the obvious ones which align with KNP priorities; there is cross over with the other areas, but these will be covered in more detail in the KES response.

### 2. General comments

The 25YEP is described as an initial iteration that contains a mix of confirmed policies and longer-term aims, with further announcements over the coming year. Therefore some of our criticisms of the 25YEP, in particular lack of detail, may well be addressed in time.

Whilst Defra, outside of the 25YEP, have indicated that they see LNPs as a key delivery partner for the 25YEP, there is little reference to LNPs within the document. Despite this, we still feel that the 25YEP does, and will, strengthen the value of Nature Partnerships at the local level.

There are some encouraging statements in the 25YEP: “green Brexit” “reform” “gold standard” “uphold environmental standards and go further”. There are also some positive aims for each of the seven policy chapters, but the detail to give confidence in the delivery of these aims isn’t always there. For many of the policies, the stated actions use language such as “investigate”, “consider” and “explore”; there seems to be a lack of any actual “doing”. There is also a lack of any firm timetable for quite a bit of the 25YEP; whilst it is appreciated that this is a long term plan, more detail on how it will actually delivered would give greater confidence in its future success. The 25YEP appears to indicate a five-year implementation phase, during which the commitments will be turned into action.

In general, this 25YEP seems a step in the right direction in respect of improving the country’s natural heritage and addressing some of our most pressing environmental challenges. The KNP board looks forward to further detail on its delivery and onward engagement with Defra and other bodies

### **3. Headlines**

In early 2018 there will be a consultation on an independent body to be set up to hold government to account in relation to the 25YEP; in addition, a consultation on underpinning environmental principles. It is also anticipated that a set of metrics to assess annual progress of the 25YEPPlan will be developed in the same year.

The 25YEP contains many aspirational targets; ones of particular interest to the KNP are:

- 75% of protected sites to favourable condition
- Creating or restoring 500,000 hectares of wildlife-rich habitat outside protected site network, focussing on priority habitats (as defined by NERC Act).
- Planting 180,000 hectares of woodland by 2042, with 12% woodland cover by 2060
- High quality, accessible, natural spaces close to where people live and work (urban focus)
- Developing better measures to assess how ecological systems and soil health are functioning
- Following the Law Commission report, assessing the potential for conservation covenants to be established to secure long-term investment and safeguards for nature conservation
- Strengthening net gain for biodiversity in national planning policy and consulting on whether this should be mandatory alongside identification of any exemptions that may be necessary
- Working with landowners, farmers, key stakeholders and local people to identify and target areas most suitable for and likely to benefit most from woodland creation
- Learning from the £15m Natural Flood Management funding to develop our knowledge, identifying and promoting practical solutions for local implementation.

## 4. Thematic summary, analysis and implications for KNP

Our response is themed around four areas, aligned to KNP priorities; planning; natural capital; health& nature and species & habitats.

### 4.1 Planning – see Chapter 1 (from page 32) “Using and managing land sustainably”

This section links to KNP Priority 1 “Strengthening the consideration of biodiversity within local plans and the growth agenda”.

The 25YEP explores how the “environmental net gain” requirement in planning system can be strengthened and states that there will be a consultation on making it a mandatory requirement. KNP welcomes the aim of embedding the net gain principle for infrastructure and housing development. Chapter 1 makes clear that net gain must be balanced with “Reducing burden and costs on developers and streamlining process” This approach is mentioned frequently in the chapter, so we must anticipate that developers will have a large influence over any reforms that come through the 25YEP.

On a more detailed note, the chapter also makes reference to district level licencing approach for Great Crested Newts and notes that the government will look to build on this approach to further streamline protected species licencing. The plan also includes a review and update of existing standards for green infrastructure by summer 2019 (led by Natural England), followed by local authorities assessing GI provision against these standards; potential incorporation of GI in national planning policy and guidance.

### Implications for KNP

#### Environmental Net Gain

KNP is already examining how to assist local plans to adopt a net gain approach, so the 25YEP gives us confirmation of the expected direction of government policy in this regard. Whilst there are still some unknowns on how this policy will shape up, KNP’s can help local authority’s future proof their local plans to some extent by starting to consider how this might be embedded and what work might be going on already. KNP would like to be involved in the consultation on Net Gain.

#### Reducing the burden and costs on developers and streamlining process

While KNP accepts the importance of involving developers, the voice of bodies such as Local Nature Partnership’s will need to be equally important to ensure that both the intrinsic value and natural capital value of biodiversity are embedded in the net gain principle and its implementation. Agreeing such an approach through the new consultation, will be no easy task, but one that KNP would like to be fully involved in.

#### Roll out of approaches such as the GCN Conservation Strategy for district licencing

KNP would like to advise some caution here, as the district level licencing approach has not been rolled out nor suitably tested to suggest yet that this is approach is appropriate or successful. KNP would want to see more piloting of this approach, before application to other species, which are likely to present more challenges in delivery e.g. bats.

#### 4.2 Natural Capital - see Chapter 1 (from page 32) “Using and managing land sustainably” and “Putting the plan into practice” (from page 128)

This section links to KNP Priority 2 “Embedding natural capital into planning and decision making.”

While there is not a specific chapter on natural capital in the 25YEP, it is mentioned frequently and would seem to be the golden thread throughout the plan. It is interesting to note how the plan describes natural capital as a useful decision-making tool, but not an absolute arbiter. This is a statement KNP would agree with, in the sense that we would like to ensure that the intrinsic value of nature is a factor in decision making, alongside the economic and social value.

“Putting the plan into practice” describes that there will be “(developed) a set of metrics to assess progress towards our 25 year goals and a second ‘National Ecosystem Assessment’ type initiative beginning in 2022. This recognises the success of the UK National Ecosystem Assessment completed in 2011 and the benefits of the natural capital approach taken since then. Such assessments will take place every ten years.

There is a welcome focus on woodland and forestry and in the introduction to the 25YEP there is also a target for “Planting 180,000 hectares of woodland by 2042, with 12% woodland cover by 2060”. Chapter 1 goes onto describe how large scale woodland creation will be enabled by a new woodland creation grant scheme and underpinned by the appointment of National Tree Champion.

Chapter 1 describes the establishment of Forestry Investment Zones that will increase the availability of sustainably managed hardwood timber supplies and increase the use of home-grown timber in construction. The actions describe an example (in Cumbria) of where the government will engage with Local Enterprise Partnerships to identify suitable areas for woodland creation.

#### **Implications for KNP**

##### **Expanding woodland cover**

Natural capital in relation to woodland management is an area of interest within the KNP plan and we welcome the prominence given to this within the 25YEP, where in chapter 1 it states that “(We will) expand woodland cover and make sure that existing woodlands are better managed to maximise the range of benefits they provide”. KNP will seek to benefit from such approaches and steer project work or funding towards the county.

##### **Roll out of Forestry Investment Zones**

KNP would like to suggest that if this is to become a model approach, LNPs are also engaged along with LEPs so that biodiversity and access benefits are delivered too, in areas where such investment would see wider benefits.

##### **Defra Area Integrated Plans**

The “Putting the plan into practice” section describes how Area Integrated Plans will be put into place in 14 areas defined by Defra. These will comprise joint statements of intent between the Environment Agency, Natural England and the Forestry Commission. These plans will be based around natural capital, an approach that KNP welcomes and would like to assist in implementing for Kent with the opportunity of aligning these plans with our own natural capital work.

#### **4.3 Health and Nature – see chapter 3 (from page 71) “Connecting people with the environment to improve health and wellbeing.”**

This section links to KNP Priority 3 “Taking forward the health and nature agenda”

The 25YEP describes the launch of a three-year ‘Natural Environment for Health and Wellbeing’ programme, focused on supporting local authorities, health organisations, health professionals, teachers and planners in promoting the natural environment as a pathway to good health and wellbeing. This is a perfect alignment with KNP priority 3, but there is no indication of timing on this.

Other areas which link to KNP priority 3 include: “Sharing lessons learned from existing social prescribing programmes widely so others can adopt best practice.” and “Increasing offer of environmental mental health therapies.” The “2019 Year of Green Action” described in chapter 3, looks like an obvious opportunity for KNP and the Kent Environment Strategy (KES). This campaign will build on the 70th anniversary of National Parks and the centenary of the Forestry Commission and encourage adults and children to take positive steps to help the natural environment and how these also support good health. This will be the start of a 5-year programme within the 25YEP.

There will be £10m funding to support “connecting people with the environment”; this is a welcome commitment in a plan which lacks much in the way of detail on funding and resources.

#### **Implications for KNP**

##### **Natural Environment for Health and Wellbeing Programme**

KNP will seek to find out more about ‘Natural Environment for Health and Wellbeing’ programme and take part in the next steps as this would seem to have a close alignment with priority 3. A “cross-government alliance” will apparently design and oversee this programme. The work KNP is currently undertaking, including the implementation of our Greenspace Needs Assessment, is very relevant to this agenda. KNP is particularly interested in areas such as planning, through which real benefits for biodiversity might be delivered on the ground by linking up the health and nature agendas.

##### **Taking forward Social Prescribing Projects**

The KNP and the county’s Countryside Management Partnerships and Public Health and partners will be interested in informing the development and delivery of this work.

##### **2019 Year of Green Action and “Connecting People with the Environment” fund**

KNP should consider working with KES and other partners to develop a programme of engagement for 2019 year of action for environment in order to take forward our work and attract some of the funding. The initiative will shape a 5 year delivery stage for the 25YEP and £10M is going to be provided nationally for “Connecting People with the Environment”.

#### **4.4 Species and habitats – see chapter 2 (from page 56) “Recovering nature and enhancing the beauty of landscapes”**

This section links to KNP Priority 4 “Improving the quality, extent and connectivity of our high value habitats”

Chapter 2 describes how a “Strategy for Nature” will be developed, to build on and replace Biodiversity 2020. LNP’s should be looking to getting involved shaping this strategy, it is not clear however when this process will start.

The chapter also states that the new strategy will be backed up by the development of a Nature Recovery Network, providing 500k hectares of additional habitat. KNP welcomes this approach which would seem to have positive implications for actions we have set out under priority 4.

Wider agriculture and CAP reform is not a primary focus for KNP as this agenda is picked up by other partnerships and groups, but we are interested in the future of Environmental Stewardship schemes, as any reforms here will have a huge significance for biodiversity.

A new “environmental land management scheme” is described in the 25YEP, that will pay farmers for “public goods” – the natural capital value of the land (including mitigation of and adaptation to the effects of climate change) as well as delivering conservation priorities.

This development will be closely tied into Brexit reform, but KNP recognises the huge potential that this reform might have if delivered properly.

With our long coastline in Kent and rich marine biodiversity, KNP is pleased to see mention of the continued implementation of Marine Plans and Marine Conservations Zones, although the commitment to delivering these areas is captured in the Marine Act legislation already.

Another area of interest in the 25YEP is the concept of taking forward “conservation covenants”, as identified in Law Commission report. If this can secure more long term commitments on land for nature/natural capital then KNP welcomes this and will be interested to see these areas delivered.

Chapter 2 also states that “(We will) conserve and enhance the natural beauty of our landscapes by reviewing National Parks and Areas of Outstanding Natural Beauty (AONBs) for the 21st century, including assessing whether more may be needed.”

Although this is an area the two AONB’s in Kent would lead on, KNP will input in this process and be looking for positive outcomes for biodiversity. We would look to the Kent Downs and High Weald AONB’s for a steer on how to engage in order to establish any position on this.

#### **Implications for KNP**

##### **A new strategy for nature**

Presuming there will still be a focus on habitats and species targets, this new Strategy for Nature will need to be transposed down to the Kent Biodiversity Strategy, which is one of the key strategies which the work of the KNP delivers for. Discussion with Defra suggests we should not be delaying our update of the Kent Biodiversity planned for this year, in order to tie in with the new strategy, as it would appear there are no immediate plans for this to be developed.

### **Nature Recovery Network**

The aim to put in place up to 25 new catchment or landscape scale nature recovery areas should be a real opportunity for Kent and KNP would seek to be included with the understanding that these areas will initially look at woodland, wildflower areas and natural flood management.

As for funding, it would appear that considerable non-government funding will be needed to support the Nature Recovery Network; it is not clear how this money will be released and whether it will be enough and KNP would welcome more detail here.

### **A new “environmental land management scheme”**

KNP will keep a watching brief on this, but would hope that the role of LNPs will be in directing what these biodiversity enhancements should be and where, so they can based on local, as well as national needs.

Overall, there is little detail on specifics for actually recovering nature and enhancing landscapes, but this will be an area KNP will continue to scrutinise and engage with as matters develop.

## **5. Delivery and conclusion - see “Putting the plan into practice” (from page 128)**

This section of the 25YEP describes how “At a local level we want environmental effort to be guided by the goals we have outlined but also to reflect local needs and priorities as well as being more integrated and efficient.”

Also a desire to “Strengthening leadership and delivery through better local planning, more effective partnerships and learning from our four pioneer projects.”

Both these statements speak to the relevance of LNP’s and KNP is already in a good position to start delivering for the 25YEP, as our Strategic Priorities and Action Plan is closely aligned to many of the areas described above. We are aware however that there is still a lot to be developed nationally in terms of the structures, initiatives and legislation that will support the 25YEP.

The 25YEP describes how the government will be: “Consulting on setting up a new independent body to hold government to account and a new set of environmental principles to underpin policy-making” and clarifies that “This consultation, to be launched early in 2018, will consider the best way to ensure government fulfils its environmental obligations and responsibilities”; the plan also notes that this policy statement will provide certainty about environmental regulations post Brexit. With Brexit and therefore the loss of the EU oversight of our delivery against environmental commitments, such a body (and guiding principles) is welcomed.

It also describes how the government will “work with leading scientists, economists and environmentalists, including the Natural Capital Committee (NCC), to develop, by the end of 2018, a set of metrics that will chart our progress towards a better environment, ensuring transparency and accountability”

### **Overall implications for KNP**

The success of the 25YEP will hinge on these steps towards delivery, along with further legislation to

ensure that the objectives of the plan are fulfilled. This will be essential to ensure the plan is not pushed to one side as a result of short term politics or changes of government priorities.

The 25YEP itself is however largely positive as far as KNP is concerned and we welcome the areas described above and will work with the Kent Environment Strategy Programme Manager on understanding where we overlap with the broader environmental elements of the plan, to ensure a coordinated approach from the county.

The KNP and LNPs in general need to ensure that they are closely involved in the consultations described above and that beyond our regional differences we identify common ground in terms of how aspects of the 25YEP should be taken forward. In some cases uniting to form a common LNP voice will be a powerful tool. This is an area KNP needs to work with LNP's around the county on in order to fully realise our influence in taking forward this significant policy document. We will utilise our membership of the Defra LNP sounding board to help ensure that this happens.