

**An Invitation to Shape the Nature of England - Discussion Document: Consultation by Defra
Response from the Yorkshire and The Humber Rural Affairs Forum (RAF)**

Agenda Item 7

Question Number	Consultation Question	Comment
1	What do we need to do to embed the true value of our natural resources in decision making at all levels?	<p>We would support an approach that promotes and embeds the wider value that the natural environment provides to the economy and society. This could be achieved through integrating the ecosystem services approach into wider aspects, such as economic regeneration. The RAF considers it is of fundamental importance that the true value of natural resources is embedded into the decision-making processes of the emerging Local Enterprise Partnerships (LEPs), rather than LEPs having a purely economic focus.</p> <p>Implementing the ecosystem services approach in practice would need to be informed by an appropriate evidence base, and most probably national guidance on the relevant framework to use to take the approach forward. Natural environment issues/priorities vary from locality to locality, and local partnerships should have a key role to play in the valuation of ecosystem services at a landscape/catchment scale. However, at present, much of the research surrounding ecosystem services and valuation techniques can be seen very much as ‘theory’, and there is a need to pull together far more comprehensive data on the economic benefits of ecosystem services so that the approach can be practically applied. Local partnerships could lead in this area, working closely with universities (eg, RELU programme) and other experts.</p> <p>Farm stewardship payments should be re-aligned to identify enhanced payments for enhanced outcomes rather than using blanket income forgone model. Local authorities and communities should be given a stake in identifying local ecosystem priorities. There is currently no influence over associated funding streams which mean local authorities/partnerships are often by-passed in intensively farmed areas (Environment Agency and Natural England deal direct with farmers). Incentives should be introduced that encourage farmers to work collaboratively on ecosystem services at a landscape scale. There should be encouragement for corporate partners with ecosystem interests (e.g. water companies, major retailers) to work with farmers to deliver wider ecosystem benefits at a landscape/catchment scale.</p>
1 a	How can we reflect all the different kinds of value described above?	Valuing non-monetary ecosystem services in objective quantitative terms is a key challenge, as is communicating the importance of the ecosystem services approach to a wider audience so that the approach is understood. The different values that the natural world provides need to be

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		<p>explained clearly in language that everyone understands. This could be facilitated by categorising them into a clear typology of different goods and services that the natural world provides to society (eg. well-being, aesthetic value, productive goods etc).</p> <p>The importance of setting an appropriate policy guidance and framework, with significant local level involvement in valuing natural resources in their localities are referred to above. We also believe that there is a need to capture the views of local people so they can input in planning and prioritising targeted interventions. A number of community engagement mechanisms (e.g. Biodiversity and Rural Partnerships/Forums) exist that can be used to achieve this.</p>
2	<p>Have we identified the right overarching challenges for the White Paper to consider?</p>	<p>Yes, although the RAF feels that the fundamental importance of the farming sector, whilst acknowledged in the discussion paper, is somewhat understated. The sector has a major, continuing role in responding to the challenges faced, and working towards a stable, viable and sustainable farming industry is of vital importance for the natural environment. As the discussion paper identifies, providing food, energy and clean water to a growing global population are indeed massive challenges going forward, but these goods can easily be taken for granted in developed societies and their true benefit often under-valued.</p> <p>The consultation paper picks up well the technical issues relating to the natural environment. However, there are also localised issues in relation to the natural environment, varying from locality to locality, that need to be recognised. It is therefore important that the White Paper does not overlook the importance of local issues, such as maintaining the condition of existing public rights of way (as just one example), which may appear minor compared to the overarching challenges, but are very real natural resource issues for many local people.</p> <p>The working relationships of the various stakeholders also need to be considered to allow any policy approach to be effectively delivered. Central to this is a move towards more effective partnership working and the adoption of a pragmatic approach to conserving and enhancing the natural environment and the goods and services it provides. Evidence from the Defra Rural Pathfinder Programme in the Humber identified blockages to cross public agency working with significant demarcation lines hampering integrated delivery (e.g. of ecosystem services).</p>

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	If not, what should we focus on?	The discussion paper focuses more on impacts and tasks rather than people. Behavioural change at organisation, group and individual levels are also vitally important in tackling overarching challenges (in line with the Government's Big Society and Localism agendas).
2 b	How should we approach these challenges?	We support the partnership working approach with a high level of pragmatism and constructive dialogue. We suggest that addressing these challenges at the local level is a sound way forward, but there still needs to be appropriate joined up thinking and action between different partners at all levels. The local approach needs to be informed/supported by strategic level targets that reflect cross-boundary issues such as landscape scale areas and Local Enterprise Partnerships.

3 a	<p>What works less well – what could we stop doing or do differently?</p>	<p>See comments above (question 2) regarding the need for better partnership working and stakeholder engagement.</p> <p>The Water Framework Directive could provide a mechanism for a more integrated approach to improving ecosystem services. However, currently it appears to be focussing on the large players (e.g. water companies). Extending the Catchment Sensitive Farming to a Catchment Management process (i.e. open out to wider stakeholders at local level) would be a very positive move.</p> <p>The Partnership feels that more should be done to engage with parish and town councils on a range of natural environment issues (eg. biodiversity, access, renewable energy), consistent with the Big Society initiative. This could lead to more environmental issues being included in community-led Parish Plans, drawing on local knowledge and initiative, although it is accepted that many parish and town councils would need additional guidance and support to help build capacity.</p> <p>We believe that the protected species elements of legislation such as Habitats Regulations and Wildlife and Countryside Act (as amended) is not working effectively, resulting in a high level of financial resources being devoted to mitigating risks to often small numbers of animals. This is often disproportionate to the threat to the species and does not produce long term gains for the species or their habitats. There is also a need for clearer guidance on Local Biodiversity Action Plans, to ensure a consistent approach and structure.</p> <p>The selection of priority habitats needs to take closer account of local conditions e.g. in an intensively farmed area there should be more encouragement to identify farmland related habitats as local priorities. Currently, local “crown jewels” tend to take centre stage.</p>
4	<p>What mechanisms should we focus on to ensure we manage our natural systems more effectively in future?</p>	<p>Ecosystem services should be integrated into wider policy and strategy development and decision making (including Local Enterprise Partnerships, Local Strategic Partnerships).</p> <p>Financial support for environmental stewardship schemes must continue as a priority, ensuring that the schemes recognise a broader more flexible range of ecosystem service provision (inc. resource protection, flood risk mitigation, access, biodiversity).</p>

		<p>Local biodiversity action plans (LBAPs) should be costed out against agreed targets and priorities set for spatial sub-areas that have ecological/landscape/catchment coherence. This could challenge the current status quo of functional LBAPs aligned to local authority boundaries</p> <p>There should also be continued support for Rights of Way Improvement Plans, and a need for them to be effectively integrated into local transport planning from a countryside/rural perspective as well as urban.</p> <p>Local authority (or LSP, LEP) climate change strategies and action plans should also include measurable actions, where appropriate, relating to the sustainable management of natural resources.</p> <p>Other mechanisms for making ecosystems more visible at a local level could be developed. Opportunities exist (e.g. RELU research) for local stakeholders to use environmental scorecards to track ecosystem services.</p> <p>Over the last twenty years successive planning guidance has reduced the consideration given to soils. Soil types (e.g. hydrological behaviour) and soil health needs to become more visible again to policy makers at the local level.</p>
4 a	How should we define success?	<p>Successful delivery of agreed outcomes identified in locally-determined strategies and action plans, including use of targets/indicators that can be monitored and reported on at the local scale.</p> <p>The National Indicator 197 (NI197) has been effective in promoting the importance of biodiversity and the natural environment, and also in driving forward action, and the continuation of this indicator would be a good measure of success and supported.</p>
4 b	How can we agree on common goals and assess our progress towards them?	<p>As above - relevant local and national indicators are a proven method of measuring progress. Effective partnership working, stakeholder engagement and good communication will be essential in determining common goals. Relevant local policies and strategies could be closely aligned to provide an overall portfolio for the natural environment at the local level e.g. climate change, biodiversity, agriculture and forestry, coastal management plans and strategies, waste policy, countryside access, green tourism strategies etc.</p>

5	How best can we reduce our footprint on the natural environment abroad, through the goods, services and products we use?	<p>The UK Government could take a lead internationally on promoting and financially supporting proven systems (such as Fairtrade) that actively promote better levels of environmental management. This leadership method should be cascaded down to all public bodies, with procurement rules reflecting this approach. Procurement rules should also be used to favour goods and products that have been produced regionally/locally with lower environmental footprints.</p> <p>The certification and clear labelling of produce should be encouraged to help inform consumers of the environmental footprint of products (particularly important for food produce).</p> <p>Issues around the waste of food (and water - including behavioural change in respect of water meters) need to have an enhanced profile.</p>
6	What best practice and innovative approaches to protecting and enhancing our natural environment do you think should be considered as we develop the White Paper?	<p>Consideration should also be given to the dissemination and roll out of findings from Land Use Futures research, and using best practice case studies from the 'Farming Futures' climate change initiative to promote a wider roll-out of innovative agricultural practices. The lessons learnt through the Rural Pathfinder Programme should also be revisited.</p> <p>The White Paper could also showcase best practice approaches to conserving important habitat networks (eg. Local Wildlife Sites, which require effective systems of management including liaison with landowners and incentives for positive management. AONBs and National Parks are important national treasures and would provide further examples of best practice). Further promotion and roll-out of successful initiatives linked with cycling and walking would be appropriate.</p>
7	How best can we harness and build on public enthusiasm for the natural environment so people can help improve it through local action, as informed consumers or by shaping policy?	<p>There is already significant public enthusiasm for the natural environment and many good examples of voluntary local action, especially, for example, in the conservation sector. Voluntary organisations/groups and towns and parish councils will play an important continuing role in engaging with local communities regarding environmental issues and opportunities for improvement.</p> <p>Local Rural Partnerships, Biodiversity Partnerships, Local Access Forums and other partnerships also have important roles in raising public awareness and engagement, and in helping to shape and influence local policy on the natural environment. Representatives of such partnerships will typically comprise enthusiastic volunteers working alongside professional</p>

		<p>officers. It is important that the White Paper recognises the value of such partnerships in helping to deliver local environmental improvements.</p> <p>Public agencies and local authorities should ideally be able to act as enablers for local action, and promote sustainable consumer choices such as local food or fair-trade products. However, there will still need to be ongoing support and funding through some mechanisms (eg. S106 funding, grants – public, charitable or green energy, Big Society Bank) to make many community environmental projects (eg. conservation, access, community energy) deliverable, and this needs to be recognised in the White Paper.</p>
8	<p>What should be our vision for the role of Civil Society in managing and enhancing the natural environment and for engaging individuals, businesses and communities in setting the agenda for that work?</p>	<p>The term Civil Society covers a very broad spectrum but many such organisations and groups, as the discussion paper acknowledges, are already very active in engaging communities, delivering initiatives and influencing decision making. The role will ultimately vary depending on the group involved, but in general terms it is likely that the involvement of the Civil Society will continue and most probably increase as part of the Big Society initiative.</p> <p>The public and businesses need to be aware of the wider benefits of good management of the natural environment. These include efficient management of resources, good press/reputation and social benefits to communities. There is a need to promote environmental responsibility among communities. The Civil Society has a role to play in these areas, alongside the public sector. Local communities can and should help in setting the agenda - however, the knowledge/capacity will vary significantly from community to community and the process may not be straightforward.</p>
9	<p>How best can Government incentivise innovative and effective action on the natural environment, across England, at the local level?</p>	<p>Through effective and clear policy, reducing the regulative burden on farmers, land managers and other organisations (especially relating to agriculture), and ensuring that available public funding is targeted in the right areas.</p> <p>A programme similar to the Rural and Coastal Pathfinders could be established for the natural environment to help develop and build good practice in integrated natural resource management. This approach has proved successful in these other rural areas. There is also a need for sound and accessible local evidence bases to support this and the development of best practice in this could be covered through the Pathfinder approach.</p>
9 a	<p>How best can local</p>	<p>As mentioned above, there should be increased support and recognition for the work of local</p>

	Government and other local partners work together to improve local outcomes on the natural environment, and pursue a more integrated approach linking a healthy natural environment to economic prosperity, sustainable development and a better quality of life, health and wellbeing?	partnerships (e.g. Biodiversity, Rural, Regeneration, Local Access Forums), which bring together local community representatives, business and public sector organisations. These are sometimes overlooked or under-valued, but these partnerships could assume a greater role in delivering a more integrated approach. Again, the Pathfinder approach is appropriate. Many effective initiatives arise from bottom-up activity.
9 b	What are the most effective mechanisms for managing the natural environment where cross-boundary issues are involved, and making the link to other mechanisms for economic growth, transport and planning?	<p>The management of the natural environment should be part of wider discussion within Local Enterprise Partnerships (LEPs). These should include the consideration of ecosystem services especially those which could support economic investment e.g. green tourism. Where cross-boundary issues exist (eg. biodiversity priority areas and habitat networks, catchment management) co-operative working between adjacent partnerships/public sector officers will be required, alongside Defra/agencies.</p> <p>Local Enterprise Partnerships can also play an important role in integrating the economic, social and environmental considerations. However it is accepted that delivering ecosystem services will not always be contiguous with LEP economic geographies and boundaries. The RAF and Food & Farming Forum could help to facilitate cross-boundary activity.</p>
9 c	How best can the value of the natural environment be considered within local planning?	<p>The existing hierarchy of designations (international, national and local) form a framework in which the most valued sites/routes are protected within the local planning process. However, there may well be greater scope for other local places valued by communities (eg. playing fields, village greens and other open/green spaces) to be better protected within local planning, for example, through the production of Community-Led Parish Plans.</p> <p>Information on the evolving research on the valuation of ecosystem services, and subsequent production of a workable policy framework, should be disseminated to planners and recognised within the local planning processes at an appropriate time.</p>
10	How best could the economy reflect the true value of nature's	<p>Appropriate measures could include:</p> <ul style="list-style-type: none"> • Introduce mechanisms that will incentivise water companies to extend work they are

	<p>services in the way business is done, to drive smarter, greener growth?</p>	<p>engaged in with farmers to reduce diffuse pollution from agriculture.</p> <ul style="list-style-type: none"> • Encourage the food chain to develop premium markets for products of sustainable agriculture (beyond farm level i.e. move to landscape and catchment level assurance). • Consider introducing a carbon market that farmers/land managers are able to participate in. • Ensure greater awareness around water resources and improve use of water metres.
<p>11</p>	<p>Responsible businesses are already looking for ways to reduce their impact on the environment. How can we encourage more action like this?</p>	<p>A range of measures will encourage appropriate action:</p> <ul style="list-style-type: none"> • Sharing and celebrate best practice, through demonstration events and better publicity (eg. Farming Futures, Campaign for the Farmed Environment, best village competitions). • Continued/increased provision of good quality low cost (or free) environmental management advice and training for businesses (eg. via Lantra/Land Skills, land management colleges, support agencies, business associations, non-governmental organisations etc). • Introduction of the Renewable Heat Incentive by Government to encourage greater take-up of renewable energy. Continued/extended mechanisms to incentivise greater take-up of energy efficiency measures by business (eg. 0% or low-cost loans). • Continued support for the RDPE Farm Resource Efficiency Programme (but with a review of the programme to be undertaken with the farming industry, to possibly extend the range of environmental activities covered and streamline the application process). • Increased use of environmental management systems and accreditation (although the administrative requirements of such systems may need to be streamlined to make them more attractive to businesses and less ‘form-filling’). • Increased sponsorship of community environmental projects (and/or creation of local grant/loan funding for communities to access) by the business sector.
<p>12</p>	<p>What are the barriers to joining up and seeking multiple benefits from our natural assets?</p>	<p>The multi-use nature of our countryside obviously means that many different interest groups are represented, commonly with conflicting priorities. To optimise the value of our natural resources, a holistic view of land management, considering environmental, social and economic factors, is needed, but to be effective and achievable this requires good communication, consultation and partnership working.</p> <p>Environmental factors are also often considered separately from economic systems. The natural</p>

		<p>environment can be perceived as a constraint on development. The natural environment should therefore be ‘front-loaded’ into consideration of planning and development at an earlier stage.</p> <p>Green Infrastructure can deliver multiple benefits from natural assets but needs to be planned and co-ordinated in a strategic rather than ad-hoc manner. The benefits of the natural environment need to be promoted in a business context. Barriers are often not the task itself but found in current organisational norms and behaviours.</p>
13	What are the barriers to thinking big and taking a landscape scale approach to managing our natural assets?	<p>Landscape scale approaches crucially require an understanding of the constraints or opportunities at a local as well as landscape scale. This necessitates clear, open and timely consultation with local communities, which has often not necessarily been the case in the past. Current incentives (e.g. stewardship, area payments) are closely aligned to individual property rights rather than landscape scale. Defra is familiar with delivering funds to holding numbers not landscapes. New paradigm thinking by major government agencies is required.</p>
14	What should be the priorities for the UK’s role in EU and international action, to protect and enhance the natural environment at home and abroad?	<p>Developing countries have a very important role to play in climate change issues. The UK should lead by example and also work internationally to secure agreements and incentives that will reduce global climate change.</p> <p>There is a high level of awareness at the farmer level of food chain issues in respect of the world larder - and about how the UK could help. The transfer of skills and research are important - overseas partnerships and exchanges will to share and learn from best practice - and to build local skills.</p>
15	If you could choose just one priority action for the Natural Environment White Paper to drive forward locally, nationally or internationally – what would it be?	<p>The White Paper must recognise the fundamental need to provide full political support for a profitable and forward-looking farming sector. This will be absolutely crucial to the delivery of a sustainable, multi-functional countryside, providing a holistic range of benefits (environmental, social and economic) and delivering against Defra’s priority of protecting the environment and enhancing biodiversity.</p>