



25 Year Environment Plan

Ambition to realisation

Sarah Anderton, Policy Adviser

Alastair Chisholm, Director of Policy

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CIWEM

106-109 Saffron Hill

London EC1N8QS

Charity registration No 1043409 (England and Wales)

SC038212 Scotland

www.ciwem.org



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Executive summary

We are currently facing an unprecedented environmental crisis. The recent National Biodiversity Network's 2019 State of Nature report shows that biodiversity declines continue unabated, with a 13% decline in average species abundance since 1970¹. Alongside this, UK Climate Projections² by the Met Office forecast changing weather patterns and highlight the need for mitigation and adaptation.

Climate change and biodiversity declines have sparked mass protests and demand for action to protect life on earth as we know it. As public interest and awareness of these challenges increase, the spotlight on environmental delivery will intensify.

At the same time, Brexit represents both an opportunity to manage the environment differently and more creatively, as well as a risk to levels of vital funding and investment if it results in significant economic impacts or regulatory erosion.

Whilst there have been welcome policy and legislative advances recently, such as the net zero emissions target by 2050 amendment to the Climate Change Act³, actually delivering against impressive pledges represents an entirely different challenge.

In January 2018 the government published its 25 Year Environment Plan (25 YEP). This drew together many existing environmental targets as well as extending ambition in some areas. The plan was widely welcomed as an important step in raising the environment up the political agenda.

Since the publication of the 25 YEP **we have seen widespread consultation and production of more detailed, target-specific plans** to address the main criticism of the 25 YEP; that it acted as a repository of targets rather than an action plan for change.

Whilst we welcome the planning activity and policy development that have been carried out since the 25 YEP launch, **we perceive that there has been a lack of focus on supporting and strengthening existing delivery.**

This focus should improve as the Office for Environmental Protection (OEP: the new independent environmental watchdog to be set up under an Environment Bill post-Brexit) begins to scrutinise progress against the 25 YEP. However, **delivery mechanisms need to be strengthened if the ambitions of the 25 YEP are ever to be achieved.**

Scope

Following identification of a range of targets requiring delivery at different geographic scales, this report reviews various government and non-government organisations currently involved in environmental delivery. The delivery landscape is complex with a plethora of bodies involved in environmental management. This report focuses on organisations that are expected to play a significant role in delivering against 25 YEP targets.

Organisations, bodies and initiatives covered in this report are: Environment Agency, Rural Payments Agency, Natural England, Catchment Sensitive Farming, Forestry Commission, local authorities, Lead Local Flood Authorities, National Park Authorities, Local Nature Partnerships, Local Enterprise Partnerships, Catchment Based Approach, water companies, Regional Flood and Coastal Committees, Internal Drainage Boards, and business.

Findings

The extent to which bodies are able to deliver environmental improvement and recovery is impressive given the challenges they face. However, delivery is falling short of what is both possible with the right approaches and levels of support, and indeed necessary to achieve the ambitions set out by government on the environment.

We have found that there are a number of factors which impact on delivery across a range of different bodies and / or initiatives, many of which are common to the majority.

Reporting

There is a need for more extensive, transparent and consistent reporting. The variety that currently exists in reporting structure, scale, and frequency **creates difficulty in assessing and comparing different bodies' delivery.** This negatively impacts on accountability and the ability to justify increased funding requests.

Funding

The lack and inconsistency of funding for nature is directly exacerbating the unfolding crisis. There is **wide variability in the levels and reliability of funding received by different organisations.** Funding reliability and long-term security was a particular issue for non-government bodies. Funding conditions experienced by some bodies incentivise short term projects over long-term strategic planning and delivery that could deliver greater benefits and so better value for money.

Delivery

Greater awareness and buy-in is required so that 25 YEP becomes a true driver of environmental delivery across government and wider society. Both government and non-government bodies and organisations' actions are contributing towards the realisation of 25 YEP goals and targets. In the case of some non-government bodies this delivery could be viewed as coincidental, with the main driver being to address pre-existing targets.

Whilst government bodies showed a good awareness of the plan, many having been involved in its drafting, non-government bodies did not all show strong awareness in their reporting.

Barriers

There are many and varied barriers to environmental recovery which must be broken down. Through our review we have identified several barriers that multiple relevant organisations are experiencing either individually or as a collective:

- **Non-alignment of their objectives with the 25 YEP goals**
- **Lack of strategic oversight and coordination**
- **Funding constraints**
- **Lack of accountability**
- **Human capacity constraints, and**
- **Misaligned boundaries.**

Collaboration

The environment is complex and interconnected. It needs far more widespread collaboration than currently exists to deliver the nature recovery and climate resilience we so desperately need.

Collaboration provides benefit through facilitating knowledge exchange, pooling resources, and developing solutions that address trade-offs and pursue win-win options. **Collaboration can also help overcome misalignment of boundaries as a delivery barrier.**

Our review identified many examples of collaboration, some of which are presented as case studies. However, most cross-organisation collaboration was focused around individual projects with limited evidence of collaborative planning at a regional scale, with the exception of specific funded approaches shown in the case studies.

Systems-based approach

The climate and ecological emergency demands a systematic response. Fundamental to any systems-based approach is a need for good **planning**, good **data**, good **monitoring and reporting** and effective **strategic oversight**. We do not consider that this is currently being provided in the context of delivering the 25 YEP.

There are a range of targets within the plan where a systems-based approach would be beneficial, but perhaps the most immediately relevant area is improving the **spatial planning and management of land-use to deliver its nature recovery ambitions.**

Strategic-level planning would greatly facilitate 25 YEP delivery provided that it was properly resourced. Such resourcing is considered necessary to unlock and enable the wider contributions that can be provided by non-governmental bodies, within which there lies enormous passion, commitment and local delivery knowledge and expertise, but which are often hampered in such delivery by the need to simply continue to exist.

In exploring collaboration further, we saw that **implementing a strong and well-designed framework could develop systematic collaboration** if it:

- **Supports structured dialogue for knowledge exchange and the development of shared environmental visions and plans**
- **Engages potential financiers**
- **Allocates central government funding in a transparent way that supports collaboration, and**
- **Fulfils a reporting function to provide accountability and allow enforcement.**

This will require appropriate design to ensure that the right parties are properly aware and engaged, and that they work effectively and efficiently together. The organisations concerned will vary with location, but the overall approach should be consistent. **Where collaborative working can be achieved effectively, it is seen as cost-effective, delivering optimal outcomes.**



Recommendations

To address the barriers identified and improve delivery against the 25 YEP goals we recommend:

- 1. Delivery organisations should be required to review their objectives and work towards 25 YEP goals. This requirement should be underpinned by a robust statutory duty for public bodies to consider and enhance the environment.**

For the 25 YEP to be an effective overarching plan, organisations which will need to deliver against it should have properly aligned objectives. This should raise awareness amongst their staff and volunteers of the importance and relevance of the 25 YEP and provide legitimacy for groups to pursue targets in the 25 YEP and bid for funding on that basis.

This could be further leveraged by a stronger statutory duty on public bodies to consider and enhance the environment in their actions. The current duty to have regard to biodiversity, which was established by the Natural Environment and Rural Communities (NERC) Act 2006, is ineffective because wording is weak and there is a lack of reporting requirements and enforcement.

- 2. Collaborative, partnership working should be facilitated through improved strategic planning and governance.**

To reap the benefits of collaboration and ensure integrated delivery, cooperation between organisations should be encouraged at a range of scales to ensure the 25 YEP goals are met efficiently and cost-effectively.

A far more strategic approach is required to planning and delivery, taking a systems-based approach to planning and delivering environmental recovery and action at the landscape scale. Appropriate statutory bodies could have responsibility for taking on a governance role depending on the location and its particular characteristics, needs and associated public bodies. **More research is needed, alongside end users, on how to best facilitate systematic collaboration in a range of different contexts and on which delivery frameworks are likely to be most effective.**

- 3. Annual reporting should be required locally, regionally and nationally.**

Organisations and their national support structures should be required to report annually on their finances, delivery and future delivery plans. This will provide transparency, allowing organisations to identify opportunities for collaboration and facilitating accountability.

Effective monitoring will be vital to the effectiveness of planning as it allows approaches to be reviewed and revised. The 25 YEP and proposals in the draft Environment (Principles and Governance) Bill linked to the new Office for Environmental Protection identify the need, and make provision, for improved monitoring of progress against indicators. This is welcome and should be enabled by clear requirements for data gathering and reporting in

common formats so that organisations can effectively share data. Once established, the OEP should ensure that all appropriate bodies – both government and non-government – are able to report on their activities in a way which effectively informs understanding of progress and of strategic planning.

Public bodies could be required to report on their progress against any stronger statutory duty on public bodies to consider and enhance the environment in their actions that could be introduced through an amendment to the NERC Act.

4. Delivery organisations should be supported in developing skills needed to deliver the 25 YEP.

To enable effective delivery and meaningful reporting, organisations should be supported in developing necessary skills. These may include data collection and analysis and natural capital accounting.

Currently government and non-government organisations are faced with skills and capacity challenges. In cases where good practice is being delivered, this is too often because of the presence of committed and passionate champions within organisations rather than as a result of comprehensive training programmes. Lack of necessary skills, linked to funding shortage, is a challenge, particularly for local authorities and those in the charitable sector.

Improved support structures are necessary to enable bodies to develop the base of skilled employees and volunteers needed in order to achieve the best outcomes at the scale needed.

5. Government funding of organisations must be reviewed.

It is essential that government commits to providing enough base funding, over the long term, to support organisations' capacity to meet their planning, external fundraising and administrative requirements.

Realistically the achievement of the government's increased ambitions on the environment will need to see a corresponding reversal of the extensive funding cuts which have been felt particularly acutely in the environment sector.

6. Innovative funding routes should be developed.

To achieve the ambition of the 25 YEP there will need to be a mix of public and private funding and investment. More concerted implementation of the polluter pays principle and natural capital accounting are important steps in encouraging the growth of private funding and further research and development of where and how these can be most effectively targeted is encouraged.

The 25 YEP provides good ambition at a time when there is a need for urgent action and investment in the environment. However, now its delivery must be secured. We urge government to consider our recommendations as a means of achieving this more effectively.



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1. Key 25 YEP targets requiring spatial scale delivery

A Green Future: Our 25 Year Plan to Improve the Environment (25 YEP) was published in January 2018. The cross departmental plan identifies aims for environmental improvement to help the government meet its manifesto pledge, “to be the first generation to leave the natural environment in a better state than we inherited it”⁴. As environmental matters are devolved, much of the plan focuses on England. However, the plan stated that the government “will work with the Devolved Administrations as we leave the EU to uphold environmental standards and go further to protect our shared natural heritage”⁵.

The 25-year timeframe is intended to work alongside powers to be established by an Environment Bill, to help protect the environment as successive governments with different priorities come to power. However, the plan includes provision for regular review which could see the level of environmental ambition altered for better or worse.

The plan is divided into six chapters which address ten overarching environmental goals:

- 1. Clean air**
- 2. Clean and plentiful water**
- 3. Thriving plants and wildlife**
- 4. A reduced risk of harm from environmental hazards such as flooding and drought**
- 5. Using resources from nature more sustainably and efficiently**
- 6. Enhanced beauty, heritage and engagement with the natural environment**
- 7. Mitigating and adapting to climate change**
- 8. Minimising waste**
- 9. Managing exposure to chemicals**
- 10. Enhancing biosecurity.**

Defra has published its first progress report⁶ covering January 2018 to March 2019, the press release for which boldly states “in the first year alone, 90% of the plan’s actions have been delivered or are being progressed”⁷. Within this time good progress has been made on a number of fronts. Defra has consulted prolifically, the agriculture⁸ and environment⁹ bills have been, at least partially, drafted and a new indicator framework has been published¹⁰.

However, whilst planning and legislation are necessary, particularly to protect the plan’s goals by enshrining them into law, so far there has been limited physical delivery. Delivery on the ground, alongside competing pressures such as housing, the economy, and health and welfare, will be fundamental to the plan’s success. Efficient and effective delivery mechanisms will be essential, even with growing public and political recognition of climate and ecological emergencies.

In achieving the overarching goals there are many specific targets that require delivery across local geographies. Given the cross-cutting nature of many of these challenges, an integrated approach to their management, drawing on multiple partners and their remits, is likely to be needed. This is often complex given varying geographic, administrative and other functional boundaries but experience is showing that integrated multi-partner working at catchment and regional scales can deliver more positive outcomes than working in silos.

The 25 YEP suggests an ambition to see improved delivery against local needs as well as national priorities,

“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.”¹¹

Through study of hundreds of targets, we have identified those within the plan where we consider delivery at a local level is necessary. This report explores current delivery against 25 YEP goals, assesses suitability of existing delivery organisations and explores how they may work most effectively together.

We have not addressed minimising waste and managing exposure to chemicals within the scope of this report. Whilst integrated local approaches do have a role to play in providing improvements in these areas, we see the main mechanism for delivery being through development and enforcement of appropriate regulation.

The table below draws together key targets from the 25 YEP with spatial delivery requirements. They are grouped under their overarching goals.

| |
|---|
| Clean air |
| <ul style="list-style-type: none"> • A Clean Air Strategy will be developed to guide targets and delivery. |
| Clean and plentiful water |
| <ul style="list-style-type: none"> • Improving at least three quarters of our waters to be close to their natural state as soon as practicable • Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies. • Develop a stronger catchment focus that brings together the Environment Agency, abstractors and catchment partnerships to address unsustainable abstraction and to improve access to water • Look to the water industry and manufacturers of pesticides and other agri-sector industries to deliver these various approaches. They will be encouraged to develop good practices, and voluntary and catchment-based initiatives to protect drinking and/or groundwater resources. |
| Thriving plants and wildlife |
| <ul style="list-style-type: none"> • Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term. • Introduce more low flow controls to protect the environment and replace seasonal constraints to allow extra abstraction at high flows. • Develop a Nature Recovery Network providing 500,000 hectares of additional wildlife habitat, more effectively linking existing protected sites and landscapes, as well as urban green and blue infrastructure. • Working with National Park Authorities to continue to deliver the 8-Point Plan for National Parks 2016-2020. • Identifying opportunities for environmental enhancement in all of England's 159 National Character Areas and monitoring indicators of our landscape's character and quality to improve landscapes for people, places and nature. • Work with partners around our National Nature Reserves encouraging wildlife to brim over and colonise new sites. • Look initially at opportunities for nature recovery through peatland restoration, natural flood management and woodland planting. • Establishing wildflower recovery areas • Support farmers to turn over fields to meadows rich in herbs and wildflowers, plant more trees, restore habitats for endangered species, recover soil fertility and attract wildlife back. • Move to a system of paying farmers public money for public goods. • Continue to invest in technical advice to support farmers and land managers in delivering the outcomes and to help them to work together to achieve benefits at landscape and catchment level. • Move towards a more effective application of the 'polluter pays' principle. |

- **Increasing woodland** in England in line with our aspiration of 12% cover by 2060: this would involve planting **180,000 hectares by end of 2042**.

A reduced risk of harm from environmental hazards such as flooding and drought

- We will also focus on: i) Using more **natural flood management** solutions where appropriate; ii) Increasing the uptake of **sustainable drainage systems**, especially in new developments; and iii) Improving the **resilience of properties at risk** of flooding and the time it takes them to recover should flooding occur.
- Test, encourage and embed natural flood management solutions in the appropriate places, and alongside more traditional defences where needed, including **new ways of financing schemes**.
- Making sure that **decisions on land use**, including development, **reflect the level of current and future flood risk**.
- We will look at improving how Lead Local Flood Authorities, water and sewerage companies, highways authorities and other **risk management authorities work together** to manage it.
- Ensuring **interruptions to water supplies are minimised** during prolonged dry weather and drought.

Using resources from nature more sustainably and efficiently

- Working with interested parties to improve and expand the range of **tools and guidance that support biodiversity net gain** approaches, including through the future incorporation of natural capital measures.
- The aim is for the 14 areas to work together, using a natural capital approach, **bringing in other partners to maximise the environmental benefits** that can be achieved from **better coordination across individual remits**.
- Move towards an approach in which the 14 **local areas are mapped and managed more as a system**, with a '**system operator**' responsible for the strategic management of the natural capital in accordance with respective local plans.
- Improving our approach to soil management: by 2030 we want **all of England's soils to be managed sustainably**, and we will use natural capital thinking to develop appropriate soil metrics and management approaches
- Working with interested parties to reduce costs to developers by expanding the net gain approaches used for wildlife to also include **wider natural capital benefits** such as flood protection, recreation and improved water and air quality - streamlining environmental process, whilst achieving net environmental gains.
- Our immediate ambition is to work in partnership with other Government bodies, local planning authorities and developers to **mainstream** the use of existing **biodiversity net gain** approaches within the planning system, update the tools that underpin them and reduce process costs on developers.
- Put **Integrated Pest Management (IPM)** at the heart of an in-the-round approach, using pesticides more judiciously and supplementing them with improved crop husbandry and the use of natural predators

Enhanced beauty, heritage and engagement with the natural environment

- Improve **social justice** by tackling the pollution suffered by those living in less favourable areas, and by opening up the mental and physical health benefits of the natural world to people from the widest possible range of ages and backgrounds
- Making sure that there are **high quality, accessible, natural spaces** close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their **health and wellbeing**.
- 'Green' our towns and cities by creating **green infrastructure** and **planting one million urban trees**.
- We will launch 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**.
- Exploring with **youth sector partners** the potential for piloting a natural environment programme with youth groups that **encourages use of natural environments through social action**. This would aim to reach more young people from disadvantaged backgrounds.
- Supporting the Parks Action Group in its work to help England's **public parks and green spaces meet the needs of communities now and in the future**.
- **Supporting Community Forests** so that they can play a leading role in **urban tree planting**
- **Encourage larger-scale woodland and forest creation**, and direct commercial investment in new productive planting towards Forestry Investment Zones.
- Enhancement of the Green Belt to make this land '**breathing space**' for our urban populations to enjoy, and our **diverse wildlife to flourish**, while **delivering the homes** this country needs.

Mitigating and adapting to climate change

- In **urban** areas, we will work with stakeholders to plant **one million new trees**. This is in addition to the **11 million trees** we will plant across the country
- Create and deliver a new ambitious framework for **peat restoration** in England.

Enhancing biosecurity

- Working with partners to **raise awareness** of invasive non-native species and the need for strong biosecurity

This is an extensive range of work. Delivery will require application of the principles in the Lawton report¹² to provide nature recovery, alongside wider land use planning and management to provide healthy soils, water and air. Urban areas will need to be engaged to deliver increased green infrastructure and access to green spaces, with a wide range of stakeholders involved. In addressing climate change and mitigating the impacts of hazards it will be important to work with natural processes.

The plan recognises that this breadth and scale of delivery will require input from many organisations,

The organisations involved may vary by area according to need, but should include Local Enterprise Partnerships, leading businesses and utility companies, Local Nature Partnerships, Catchment Partnerships, local authorities, National Park Authorities and water companies.¹³

Involvement of local organisations is important to ensure local knowledge is used to deliver local benefits alongside meeting national aims. There are many other organisations that could also be added to those quoted above, including those within the Defra family. This demonstrates the complexity of environmental management and raises integration of delivery efforts as a challenge for achieving 25 YEP goals and targets.

2. Delivery bodies currently operating

There are many organisations, bodies and initiatives involved in delivering against national environmental objectives at a local level. The diagram below identifies some of the organisations operating across England. These sit within a wider framework that is extensive, having developed organically over time.

There are proposals within the 25 Year Environment Plan (25 YEP), and around a post-Brexit environmental scrutiny and delivery framework, for both local and more strategic level plans to guide environmental recovery and improvement. It is likely that a combination of the organisations below will play a role in producing and implementing these.

The blue shading highlights those discussed in this section below. These organisations, bodies and initiatives are likely to be most actively involved in the delivery of environmental targets.



Environment Agency

Remit

Established in 1996 to protect and enhance the environment, the Environment Agency is England's environmental regulator, enforcing our standards, as well as a delivery organisation.

The Agency has responsibility for several areas, listed on GOV.UK as:

- "regulating major industry and waste
- treatment of contaminated land
- water quality and resources
- fisheries
- inland river, estuary and harbour navigations
- conservation and ecology"¹⁴.

Structure

The Environment Agency is a non-departmental public body. It's led by a non-executive Board, appointed by the Secretary of State for Defra, which ensures the Agency is fulfilling its statutory duties, following the Secretary of State's directions, and operating in an orderly and efficient manner¹⁵. The Board members are accountable to Parliament.

The Agency operates across 14 areas covering England, with work carried out by over 10,000 employees. It looks to embrace collaboration where possible, recognising that it improves efficiency, and works in partnership with many other organisations including other government bodies, local authorities, and the Catchment Based Approach.

A map of Environment Agency areas can be seen in Appendix one.

Delivery

The Environment Agency's actions are guided by its plan, *Creating a better place: our ambition to 2020*¹⁶. Key activities that the Environment Agency carry out are permitting, monitoring, incident management, and enforcement¹⁷.

Abstraction licences are managed by the Environment Agency. The Environment Agency is implementing its Abstraction Plan¹⁸ to improve availability of water, for the environment and users, and improve water use efficiency. The Environment Agency also responds to drought incidents.

The Environment Agency work alongside other organisations to deliver enhancements to the water environment (in 2018-19 1,719km¹⁹), expand habitats (in 2018-19 460 hectares of improved habitat²⁰) and improve flood protection. In 2018-19 50,754 homes were better protected from flooding and the Agency was on track to meet its target of better protecting

300,000 households by March 2021²¹. The Environment Agency has recently consulted on its draft Flood and Coastal Erosion Risk Management Strategy²².

The Environment Agency also publishes guidance and research, for example it published its *Evidence base for working with natural processes to reduce flood risk*²³ in October 2017. Expanding use of natural flood management solutions in an aim within the 25 Year Environment Plan.

The full range of Environment Agency work is recorded in their annual reports which are published online²⁴.

Funding

The Environment Agency receives funding from Defra and from fees and charges. In 2018-19 these sources provided 66% and 34% of funding respectively²⁵. Fees and charges include abstraction charges and fishing licences. The Environment Agency carried out a review of charges in 2017, resulting in a move to cost reflective charges which came into force in 2018²⁶. In 2018-19 the Environment Agency invested £1.395 million in the environment, an increase from £1.315 million the previous year²⁷.

The Environment Agency uses some funding for its own delivery work but also pays grants to other organisations such as local councils and internal drainage boards for work on flood and coastal erosion risk management.

The way that the Environment Agency uses its funding is scrutinised through a reporting process set out under section 45 of the Environment Act 1995²⁸.

Delivering against the 25 Year Environment Plan

The Environment Agency was involved in drafting the 25 YEP and is looking to contribute to its delivery.

For delivery of the 25 YEP goals, enforcement of existing regulations is important. New regulations may be necessary to deliver some changes in approach identified in the 25 YEP and it may be appropriate for the Environment Agency to take on enforcement in some of these areas.

The Environment Agency's work, alongside others, to deliver projects on the ground will also continue to be important. The Agency is putting in place plans to expand its delivery against the plan, for example it has set up team to focus on reducing plastic pollution and improving sustainability²⁹. The Agency also has a role to play in promoting new research and best practice to improve external delivery, as with its research on working with natural processes for flood management.

The Environment Agency has strong links with many other organisations and could act as a bridging-agent if needed. Potential frameworks to support delivery, and roles within those, are discussed in section 4 of this report.



Rural Payments Agency

The Rural Payments Agency (RPA) was established in 2001 as an executive agency.

Remit

The RPA's main responsibility is to administer subsidies and other payments to support food and farming and incentivise environmental benefits delivery³⁰. It also has responsibility for improving farming productivity, contributing to the control of disease in livestock, providing import and export licences, and boosting the rural economy³¹.

The RPA administers the two main schemes under the Common Agricultural Policy (CAP), the Basic Payment Scheme (BPS) and Countryside Stewardship (CS). These will continue to apply post-Brexit as we transition to our own nationally designed Environmental Land Management (ELM) scheme, currently being designed based on the principle of public money for public goods. Agri-environment schemes are important for large scale land management for public benefit. This delivery mechanism requires considerable development and detailed discussion that is beyond the scope of this report.

The RPA has had responsibility for administering area-based payments to farmers through BPS since its introduction in 2015. It has more recently, October 2018, taken on administration of CS. Prior to this CS administration sat with Natural England.

In order to qualify for BPS payments land managers must meet cross-compliance rules. The RPA ensures these are being met through running an inspection programme. Enforcement of other requirements, such as the Farming Rules for Water³², sit with the Environment Agency.

Dame Glenys Stacey recently completed a review of farm inspection regulation³³ and called for a more flexible approach to enforcement. When cross compliance rules are no longer in place as a result of the transition away from BPS, a new and effective enforcement mechanism for regulatory requirements will be needed.

As well as including CS, the Rural Development Programme for England, administered by the RPA, supports businesses in the rural economy through a range of other schemes and grants including Countryside Productivity. The Countryside Productivity scheme provides grants to support the forestry sector, water resources management, and farming productivity and adding value, which covers knowledge exchange³⁴.

Structure

The RPA is led by its Chief Executive Officer and a team of Executive Directors. There is an Agency Management Board responsible for performance and escalating issues to the CEO and Defra. There is also an Audit and Risk Assurance Committee³⁵. The RPA employs some 2,300 staff³⁶.

Delivery

RPA delivery has been heavily criticised, particularly around delayed and inaccurate payments to farmers, as detailed in the Environment Food and Rural Affairs report, *Performance of the Rural Payments Agency*³⁷.

There is evidence that schemes the RPA delivers have provided benefits. For example, in its 2017-18 Annual Report and Accounts, the RPA stated, "LEADER has contracted the majority of the jobs in the Programme so far, with over 2,500 contracted and more than 450 of those already delivered."³⁸

However not all benefits are as simple to measure and whilst individual options within environmental schemes have been shown beneficial, there is criticism that it is hard to assess the overall effectiveness of agri-environment schemes due to their design³⁹. This underlines the importance of metrics for the new Environmental Land Management scheme.

It has also been noted in the past, for example by the County Land and Business Association⁴⁰, that where scheme design is seen as overcomplex, making it inaccessible to some applicants, this automatically limits the potential for delivering environmental benefit. Complexity can be seen as a particular issue when transitioning to a new scheme, which highlights the importance of clear communication in that period.

The RPA play a role in responding to environmental hazards. After flooding in 2015-16 a Farming Recovery Fund was established to help farmers restore land for productive use⁴¹.

The RPA have worked in collaboration with others in some instances, for example it worked with Local Enterprise Partnerships to deliver the Growth Programme, which saw increased funding in 2018 for food processing, tourism and business development⁴².

Funding

The RPA's running costs are funded by Defra. In 2017-18 gross running costs were £142.1million⁴³.

The RPA are directed by Treasury, under the Government Resources and Accounts Act 2000⁴⁴, to provide a statement of accounts each year⁴⁵. RPA annual report and accounts are published online⁴⁶.

Delivering against the 25 Year Environment Plan

As a result of the UK's departure from the European Union, the UK will also leave the Common Agricultural Policy. In England, the Agriculture Bill⁴⁷ and supporting Policy Statement⁴⁸ set out Defra's intention to transition to a system of public money for public goods, a target of the 25 YEP.

A new Environmental Land Management scheme is currently being designed to facilitate a public money for public goods approach and will also be essential in meeting several other 25 Year Environment Plan spatial targets:

- "by 2030 we want **all of England's soils to be managed sustainably**, and we will use natural capital thinking to develop appropriate soil metrics and management approaches"
- "**Support farmers to turn over fields to meadows** rich in herbs and wildflowers, plant more trees, restore habitats for endangered species, recover soil fertility and attract wildlife back"
- "We will also look at establishing **wildflower recovery areas**"

- “Develop a **Nature Recovery Network** providing **500,000 hectares of additional wildlife habitat**, more effectively **linking existing protected sites** and landscapes, as well as **urban green and blue infrastructure**”⁴⁹.

With farmers being responsible for approximately 70% of land in England⁵⁰, a well-designed new Environmental Land Management scheme will be imperative in supporting delivery for the environment and meeting targets within the 25 Year Environment Plan.



Natural England

Natural England's purpose is to "ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development"⁵¹.

Remit

The remit of Natural England is:

- "promoting nature conservation and protecting biodiversity
- conserving and enhancing the landscape
- securing the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment, e.g. new tower hide at Shapwick Heath National Nature Reserve
- promoting access to the countryside and open spaces and encouraging open-air recreation
- contributing in other ways to social and economic well-being through management of the natural environment, e.g. changes to wildlife licensing to improve flexibility for developers"⁵².

Natural England's conservation priorities are set out by their strategy Conservation 21⁵³.

Structure

Natural England was set up in 2006, under the Natural Environment and Rural Communities Act⁵⁴, as a non-departmental body sponsored by Defra. It is led by a Non-Executive Board, whose chairperson and members are appointed by the Secretary of State. The Board is responsible for setting the strategic direction and advising the Senior Leadership Team and scrutinising performance⁵⁵.

Delivery

Natural England delivers benefit through advising the government on laws, policies and plans. They also have some delivery and regulatory responsibilities, enforcing laws protecting wildlife and the environment. In the past Natural England has focused delivery around local projects delivered in partnership, however its conservation strategy required it to shift to a landscape focus.

Natural England's 2018-19 annual report⁵⁶ highlighted key delivery achievements, including:

- "significant strides forward in helping deliver A Green Future: Government's 25 Year Plan to Improve the Environment"
- "working with Defra on trials and tests for the new Environmental Land Management System (ELMS)" "notified an additional 3,821 hectares of land as Sites of Special Scientific Interest" "responded to almost 50,000 planning, licensing and Sites of Special Scientific Interest (SSSI) consents and consultations".

Natural England monitors its performance against key performance indicators which are recorded for each financial year in the Natural England Action Plan.

*Building Partnerships for nature's recovery*⁵⁷, Natural England's Action Plan for 2019/20 was recently published and is heavily focused on fostering partnerships which provide best value and deliver against the 25 YEP. The four key areas for action set out in the plan are greener farming and fisheries, sustainable development, connecting people with nature, and resilient landscapes and seas.

The report gave examples of previous delivery in the areas, including:

- Work with farmer clusters
- Piloting of the 'Payment by Results' approach that the new Environmental Land Management schemes will look to utilise, and
- Co-design of delivery projects for Children in Nature Programme alongside Defra and the Department for Education⁵⁸.

The key performance indicators in the plan are based around 25 YEP key areas reflecting Natural England's aim to deliver against the 25 YEP.

Funding

Natural England is predominantly funded by Grant in Aid from Defra. For 2019/20, 78% of their total income of £109.8million is Grant in Aid. Natural England also have £9.9million of externally funded partnerships agreed for 2019/20⁵⁹. Operating income and fees and charges are other sources of income⁶⁰. In 2018/19, Natural England generated over £5million through commercial services⁶¹. Natural England plans to continue diversifying their income sources to reduce reliance on Grant in Aid.

The 2017-18 Annual Report and Accounts highlighted that Natural England was "moving away from temporary outcomes to securing long term and sustainable environmental investment"⁶². Natural England is also embracing a shift towards natural capital approaches.

Natural England has faced severe budgetary cuts since 2008/09 when its Grant in Aid funding from Defra stood at £265 million⁶³. This has resulted in staff redundancies and decreased its ability to enforce regulation.

Natural England recognised the impact of funding cuts in their Action Plan for 2019/20 stating, "money continues to be tight which means we need to stop or slow some work. We simply can't do everything we used to do, especially as we need to create space for new priorities"⁶⁴.

In 2018 the House of Lords Select Committee on the Natural Environment and Rural Communities Act 2006 stated that,

Funding limitations have led to an increased focus on core regulatory functions and will, ultimately, lead to Natural England becoming unable to fulfil its general purpose. The Government must take steps to resolve this situation, particularly in light of the changes to environmental protection and management that will be brought about as a result of

*our departure from the European Union. We recommend that Natural England should be funded to a level commensurate with the delivery of its full range of statutory duties and responsibilities. This situation should be addressed as a matter of urgency.*⁶⁵

The latest government Spending Round, September 2019, set departmental spending plans for 2020-2021. Within this a £90million funding increase was allocated to be split equally between decarbonisation, air quality and biodiversity⁶⁶.

In 2018-19 Natural England's central government funding was £82.2million which dropped to £66.4million for 2019-20⁶⁷. With the additional £30million, Natural England's budget for 2020-21 would only be £14.2million higher than its 2018-19 budget. Natural England Chair, Tony Juniper, expressed disappointment with the £30million increase for biodiversity in 2020-21⁶⁸.

The next multi-annual Spending Review will be in 2020.

Delivering against the 25 Year Environment Plan

One of Natural England's aim is to "be at the forefront of implementing the Government's ambition to be the first generation to leave the natural environment in a better condition than we found it"⁶⁹. Working towards delivering the 25 YEP goals is essential to achieving that aim. Natural England was involved in drafting the plan and goals such as thriving plants and wildlife fit well with Natural England's existing work.

The 2019/20 Action Plan sets out various steps that Natural England will be taking to contribute towards delivery of 25 YEP targets within the four priority areas they have identified; greener farming and fisheries, sustainable development, connecting people with nature, and resilient landscapes and seas.

Specific actions identified include to:

- **Lead on development of Environmental Land Management scheme guidance**
- **Shape local and national implementation of biodiversity net gain**
- **Inspire future generations through Nature Friendly Schools, Growing Care Farming, and Community Forests and Woodland Outreach**
- **Lead the development of the Nature Recovery Network, and**
- **Provide metrics and data to allow 25 YEP progress to be monitored⁷⁰.**

We agree with the House of Lords Select Committee that Natural England's funding must be reviewed and increased to allow full delivery against their remit and appropriate ambitions of the 25 YEP which they are viewing as a delivery priority.

Catchment Sensitive Farming partnership (CSF)

Catchment Sensitive Farming is a partnership between Natural England, Defra and Environment Agency; working together with farmers and organisations in priority catchments across England to improve water and air quality.

CSF provides free expert advice, training and grant support to enable farmers to take voluntary action to improve the environment and their farm business.

Since 2006, CSF has worked with nearly 20,000 farms and helped farmers take more than 70,000 positive actions to reduce pollution⁷¹. This has contributed to a reduction in diffuse pollution.

As part of Defra's Clean Air Strategy, the government allocated CSF an additional £3 million over 3 years, to work with the agriculture industry to reduce ammonia emissions and improve air quality⁷².

Remit

Catchment Sensitive Farming partnership was established in 2005 with the primary objective of "encouraging voluntary action from farmers to help achieve Water Framework Directive (WFD), primarily Protected Area, and Sites of Special Scientific Interest (SSSI) objectives"⁷³.

In 2018 CSFs remit was expanded beyond water to include reducing ammonia emissions and improving air quality. Natural flood management advice is also being trialled in specific areas.

CSF's vision is to "support farmers in achieving clean water and a healthy diverse environment; to benefit people and the economy for future generations"⁷⁴.

Structure

CSF's delivery mechanism sits within Natural England and runs in partnership with the Environment Agency, who undertake evidence collection and evaluation, and Defra, who provide policy guidance and funding⁷⁵. CSF also works collaboratively with other partners and organisations, for example agricultural bodies and water companies.

The benefits and intention to expand this approach were stated in the 2017 Phase 3 Delivery Update Report:

*Strong partnerships help make the best use of all available funding streams, provide room for creative problem solving and structure for on-going management. This model could be rolled out more widely to generate cost effective multiple benefits.*⁷⁶

CSF has a national stakeholder group and local steering groups. Advice is delivered to farmers and land managers through: Catchment Sensitive Farming Officers (CSFOs), delivery partners, private contractors, and events which are frequently run jointly with the farming and water industries. All advice delivered to farmers on a one-to-one basis is confidential.

Geography

The areas for delivery for phase 4 (2016-2021) have been determined by targeting work which includes priorities for Countryside Stewardship (CS), the agri-environment scheme delivered by Defra using pillar two funding under the Common Agricultural Policy.

The targeting identified areas within the Water Framework Directive Water Management Catchments where water pollution from agriculture is an issue and where both CSF and CS can contribute to Water Framework Directive objectives. The areas identified for delivery are called 'Water Priority Areas'. The medium and high priority areas can be viewed on the Magic Map website⁷⁷ and are shown in Appendix one.

Targeting of delivery is used to help ensure that CSF provides best value for money. However, it is recognised that there are many additional areas that would benefit from access to CSF. Exclusion of those farms outside Water Priority Areas can act as a disadvantage in securing certain grants.

The current partnership approach is extending delivery areas. For example, water companies fund some CSF activity as a means of effectively meeting water quality objectives. This extends CSFs work outside CS Water Priority Areas and enables links to bespoke water company grants. Partnerships also help enhance delivery within CSF Priority Areas and ensure effective joint working at the local level.

CSF also operates national partnerships, for example with the Rivers Trust, Professional Nutrient Management Group, Voluntary Initiative and Linking Environment And Farming⁷⁸. CSF uses both informal working arrangements and formal joint funded partnerships for its collaboration.

Delivery

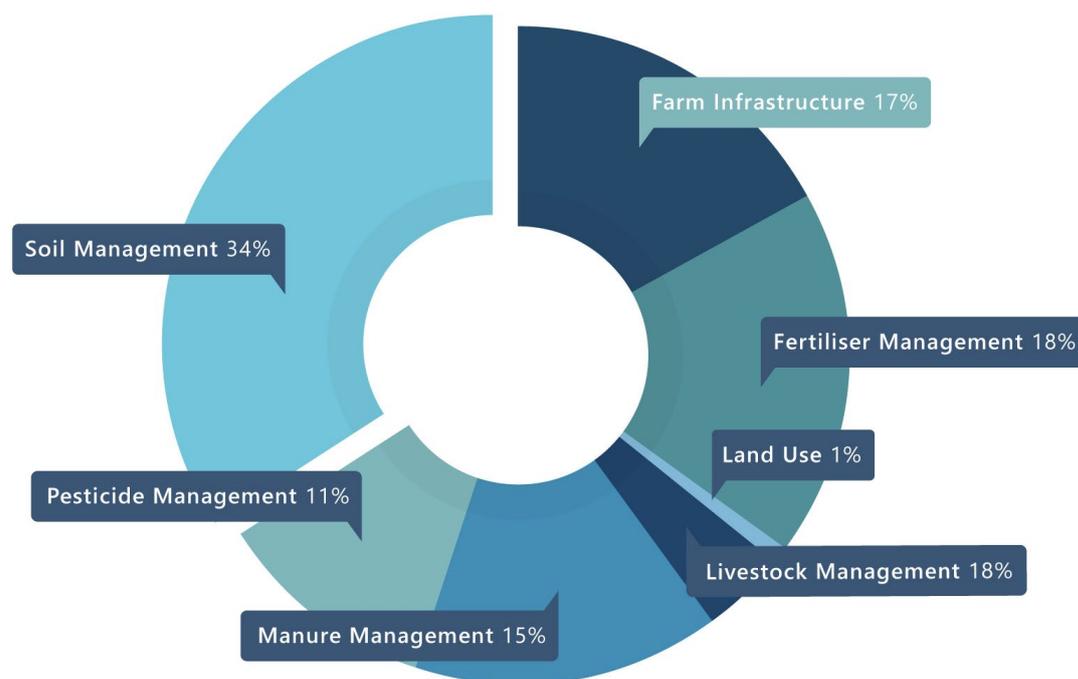


Figure one: Phase 3 CSF advice delivery, adapted from CSF Phase 3 Delivery Report Update⁷⁹

The 2014 evaluation covering phases 1 to 3 stated that, “pesticide levels have declined significantly”, “sediment pressures have also been reduced” and “modelling indicates CSF is making a significant contribution to meeting ‘sector weighted or proportional targets’ (based on the agricultural contribution of the pollutant) for Protected Areas, SSSIs, and WFD good status, across CSF target areas”⁸⁰.

There is a delay of around three years before water quality improvements are seen⁸¹. Factors in this delay are that it takes time for CSFOs to build trusted relationships with farmers, that there is often a delay between receipt of the advice and widespread implementation of advised measures and that the impact of those measures may not be immediate. External factors such as weather can also impact on level of benefit seen.

CSF recognises that it is important to secure benefits in the long term, so focuses on maintaining existing measures as well as implementation of new measures⁸².

In addition, CSF supports farmers’ CS applications for infrastructure and land management changes to improve water quality, funded by the Rural Development Programme for England through CS agreements and match funded by the farmer.

Funding and resource

CSF is largely funded by a combination of Defra Grant In Aid, Rural Development Programme for England and water companies.

During 2019/20, CSF’s budget in Natural England was £6.6 million, with a further £1 million in the Environment Agency. Natural England funding was from two streams, Grant in Aid, £1.635 million, and Rural Development Programme for England £5 million.

Funding covers the salary costs of all CSF staff, as well as approximately £2.1 million of programme budgets. CSF is co-developing mechanisms to blend government and private sector investment and works with 10 water companies across England.

Delivering against the 25 Year Environment Plan

CSF delivery contributes towards several of the 25-year plan goals: clean air; clean and plentiful water; thriving plants and wildlife; reduced risk from hazards, and resource efficiency. Following expansion of its remit in 2018 to include ways to reduce air pollution, to help meet National Emissions Ceiling Directive objectives and Defra’s Clean Air Strategy, CSF helps mitigate climate change.

CSF provides advice on Natural Flood Management (NFM) in targeted areas and is exploring the potential for a fully integrated advice package covering water resources, flood risk, water and air quality. This could offer the potential for CSF to expand into new parts of the country.

CSF is working with the Environmental Land Management (ELM) Trials and Testing team on developing aspects of the agriculture support scheme to replace the Basic Payment Scheme and Countryside Stewardship scheme that have been in place under the Common Agricultural Policy.

Noting that advice is already provided on pesticides, the CSFs delivery model could be extended to cover Integrated Pest Management, a target under managing land more sustainably.



The Forestry Commission

The Forestry Commission, formerly Forestry Commission England, is a non-ministerial government department and statutory body with responsibility for protecting and expanding sustainable woodland management. It works with two agencies, Forestry England, formerly Forest Enterprise England, and Forest Research. Forestry England manages the Public Forest Estate and Forestry Research undertakes forestry and tree related research⁸³.

Remit

The remit of the Forestry Commission is to advise ministers on forestry matters and implement forestry policy⁸⁴. It has three overarching objectives:

- “protecting our trees, woods and forests from increasing threats such as pests, diseases and climate change
- improving our woodland assets, making them more resilient to those threats and increasing their contribution to economic growth, people’s lives and nature
- expanding our woodland resources to increase their economic, social and environmental value”⁸⁵.

Structure

Following an announcement in 2017⁸⁶, this year (2019) the Forestry Commission saw significant structural changes, to reflect Scotland’s departure from the group in line with devolution of this policy area. Whilst Forestry Commission work will now focus primarily on England the work of the Forest Research agency will continue to operate across the UK as plans have been made for cross-border functions⁸⁷. Forestry in the devolved nations is otherwise covered by: Scottish Forestry, Natural Resources Wales, and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland.

The Forestry Commission is both a non-ministerial government department with a Royal Charter⁸⁸ and a statutory body with a Board⁸⁹.

The Board has a chair and up to 10 Forestry Commissioners. These people are appointed by the queen, following recommendation by Ministers⁹⁰. The Commissioners have a legal duty to balance the interests of conservation and timber supply⁹¹.

Delivery

Delivery against the Forestry Commission England Corporate Plan is detailed in the Forestry Commission’s Annual Report and Accounts⁹². The report provides many examples of delivery, including:

- Raising awareness of biosecurity through the Keep It Clean campaign
- Undertaking a wildfire scenario training exercise
- Working with the Environment Agency and Forest Enterprise England, now Forestry England, on natural flood management projects
- Supporting education on forests in various ways

- Regulating felling through licences
- Supporting the expansion of woodlands through managing grants and running design workshops⁹³.

Forestry Commission has responsibility for administering some grant schemes on Defra's behalf, which totalled £8.1million in 2018-19⁹⁴.

Funding

Forestry Commission is allocated funding from Defra but in 2018-19 it also received resources from the European Union, local authorities and non-governmental organisations.

Delivering against the 25 Year Environment Plan

The Forestry Commission is already meeting the 25YEP goals in many ways and can continue to contribute to the 25 YEP, for example through:

- **Planting trees**
- **Addressing biosecurity**
- **Addressing water quality and flood risk through natural flood management advice, and**
- **Increasing engagement with the natural environment.**

Local Authorities

Structure

The term 'local authorities' covers county councils, district councils, metropolitan districts and London boroughs. There are also cases where local authorities merge or collaborate and are called unitary authorities or combined authorities.

Local councils (county and district) are the most common type of local authority. They are made up of councillors elected by local citizens. The decisions made by councillors are implemented by permanent staff who work for the council.

Teams within authorities have faced multiple reorganisations to improve efficiency in attempts to counteract the impacts of funding cuts in recent years.

Remit

Local authorities have an extensive range of duties which have been imposed by statute over time. These diverse requirements include housing, social care, education, planning and environmental matters such as air quality and flood risk management.

Local authorities should also meet the aims they have agreed with local people and businesses.

Geography

Across England there are 353 local authorities, covering all areas of the country⁹⁵.

Planning and delivery

Planning

Local planning authorities are responsible for creating local plans, which drive the actions of wider local authorities such as district and unitary authorities. Local plans are drafted considering the feedback of residents, landowners, businesses and developers, gained through extensive consultation. The plans must address both local and national priorities and be supported by a robust evidence base, showing that they are realistically deliverable.

National planning priorities are set out in the National Planning Policy Framework (NPPF), which was revised in 2018. The NPPF, produced by the Ministry for Housing, Communities and Local Government, covers a wide range of planning issues from delivering affordable housing to enhancing the historic environment and has a strong focus on achieving sustainable development.

Local and neighbourhood plans

Before implementation, local plans are examined by the Planning Inspectorate which assesses whether the plan is 'sound' and can provide suggestions for improvement. An adopted local plan can only be overturned on a point of law by a successful High Court challenge.

Local plans have a significant bearing on the environment, not least because they determine where and how development will take place. Local planning authorities refer to the local plan, neighbourhood plan, appropriate supplementary planning guidance and any other material considerations in deciding what planning applications to approve and what planning conditions it may be appropriate to impose to ensure that negative impacts of development are minimised and development contributes to the wider delivery of benefits for the local community and environment.

Neighbourhood plans were introduced by the 2011 Localism Act. These are not a legal requirement, but communities can choose to develop one to give them a greater say in the way land is used in their area. The development of the plan is led by the parish or town council, a neighbourhood forum or a community organisation. Neighbourhood plans sit alongside local plans and are considered in the determination of planning applications⁹⁶.

Delivering increases in local housing supplies, and ensuring affordability of housing, are key targets for local authorities under the current government. Balancing this delivery against minimising environmental impacts can be very difficult. It is important that local planning authorities have an up to date local plan in place, identifying land supply for housing development, as where this is not the case it can be very difficult to refuse planning permission for development that may not be as strategically placed as the authority would like.

In future local planning authorities will need to engage actively with delivery of net gain through planning and development control processes, as the Chancellor of the Exchequer confirmed in the 2019 Spring Statement that Biodiversity Net Gain, a major target within the 25 Year Environment Plan, would be placed on a statutory footing. This is likely to expand beyond biodiversity to wider Environmental Net Gain in coming years, to deliver enhancements in flood resilience, air and water quality and recreational opportunity.

The introduction of this policy provides a positive driver for local authorities to better consider land use as a whole in updating their local plans, such that strategic areas for biodiversity can be planned alongside areas for domestic and business development. Strategically planning for biodiversity should help deliver against the principles identified in the 2010 Lawton report⁹⁷, of more, bigger, better and joined up spaces for wildlife, and could contribute towards the 25 YEP's Nature Recovery Network.

The local context embodied by local authorities has made them a focus for thinking around the planning and delivery of improvements to natural capital and associated ecosystem services, which was prioritised by the 25 YEP. Government proposed to link its proposals for a Nature Recovery Network into the planning system. Consequently, the concept of local natural capital plans or local nature recovery plans has been discussed as a way of planning for nature recovery. Local authorities may be an appropriate owner of such plans and lead such an approach, alongside a range of other organisations which may vary depending on local context.

Where local development has taken place without planning permission, development does not match the permission, or planning conditions have not been met, the local planning authority has the power to require developers to act to remedy this.

Delivery

Alongside the planning process, local authorities deliver benefits for the environment through activities including managing areas of public open space, contributing to flood risk management (unitary authorities and country councils have responsibilities as Lead Local Flood Authorities, covered separately, Highways Authorities also have important responsibilities as a risk management authority), and through responding to government department requirements, for example the Defra requirement to produce clean air plans.

Many local authorities work actively with other initiatives such as LNPs, LEPs and catchment partnerships, but do not often drive projects delivered by those organisations. They provide an important link for these partnerships to understand and engage with local development, social and environmental priorities and needs, and identify opportunities for collaboration on issues such as development of blue-green infrastructure and management of local nature reserves.

A recent example of a local authority taking environmental action that contributes to 25 Year Environment Plan goals can be seen in Herefordshire council running a Natural Flood Management construction grant to support the River Wye and Lugg Natural Flood Management project⁹⁸. The guidance note indicates that the grant has been developed with assistance from several government bodies, NGOs and membership organisations⁹⁹.

Local authorities currently struggle to fully deliver against their wide remits due to budget constraints. Spending on education and social care is often prioritised over other issues that have a less immediate impact on citizens' wellbeing, but which are nevertheless strategically important to ensuring a healthy, productive community and environment.

Funding

Delivery has become increasingly difficult as budgets have been reduced year on year since 2010-11. Overall by 2017-18 local authorities had experienced a 49.1% funding cut in real terms¹⁰⁰.

Funding levels are particularly uncertain currently as this financial year, 2019-20, is the last year in the four-year funding settlement.

The House of Commons Housing, Communities and Local Government Committee reviewed how well existing funding meets local needs, publishing a report in August 2019¹⁰¹. The report provided several conclusions and recommendations including,

- "If HM Treasury wants local government to continue providing the services it currently does it needs to provide local government with a significant real-terms increase in its spending power" and
- "Devolution of more responsibilities and revenue-raising powers to local government has the potential to improve the financial sustainability of the sector and allow better and more integrated services for the public"¹⁰².

The planned autumn 2019 Spending Review was replaced by a Spending Round, prolonging long term budget uncertainty. The Spending Round covered 2020-21 budgets only, it provided £1.5 billion additional funding for social care¹⁰³.

The next multi-year Spending Review will be in 2020. The Spending Review should cover how the UK Shared Prosperity Fund, replacing EU structural funds, is to be managed.

From 2020 the Fair Funding Review, which has not yet concluded, will determine how centrally allocated money is distributed between authorities¹⁰⁴.

Funding from central government is received through grants from the Ministry of Housing, Communities & Local Government (MHCLG). MHCLG funding is determined by the Treasury.

Local authorities also receive funds raised through council tax and other fees and charges.

The local planning process offers opportunities to direct levies associated with development to environmental improvement. Section 106 Agreements and the Community Infrastructure Levy may be used to fund delivery of measures to mitigate certain impacts associated with development. Such monies represent an opportunity for the delivery of environmental projects by appropriate organisations.

Delivering against the 25 Year Environment Plan

Local authorities have comprehensive geographical coverage and experience in implementing policy. However, with austerity-driven funding cuts their ability to deliver against priorities themselves has been diminished. In-house expertise have diminished as some professionals, such as ecologists, have been made redundant in cost saving restructuring exercises.

Properly funded local authorities would have the ability to oversee implementation of policies with multiple benefits. In relation to the 25-year environment plan local authorities will be particularly important to the implementation of a number of targets including net gain for development, achieving clean air aims, protecting green space through local plans and securing recreational access to that space, and ensuring green infrastructure delivery.

Whilst their own delivery capacities may be limited, local authorities are important partners for a wide range of initiatives, ensuring that these are well-integrated with local development priorities and needs.

Case study: Broomfield Park wetland, Enfield Council

Project overview

Enfield Council, North London, has undertaken to deliver a programme of works which, in combination, will reduce flood risk for approximately 200 properties in the Enfield Town area, provide biodiversity benefit and improve water quality¹⁰⁵.

The benefits will be delivered through the creation of wetlands and river restoration projects. Broomfield Park wetland is one project within this wider proposal.

Broomfield Park is owned and managed by Enfield Council for the benefit of local residents. A 0.3-hectare wetland is being created in a section of the park to filter untreated surface water before it enters Pymmes Brook, provide benefits for biodiversity and attenuate flooding by acting as a temporary store for approximately 2,500m³ of flood water¹⁰⁶.

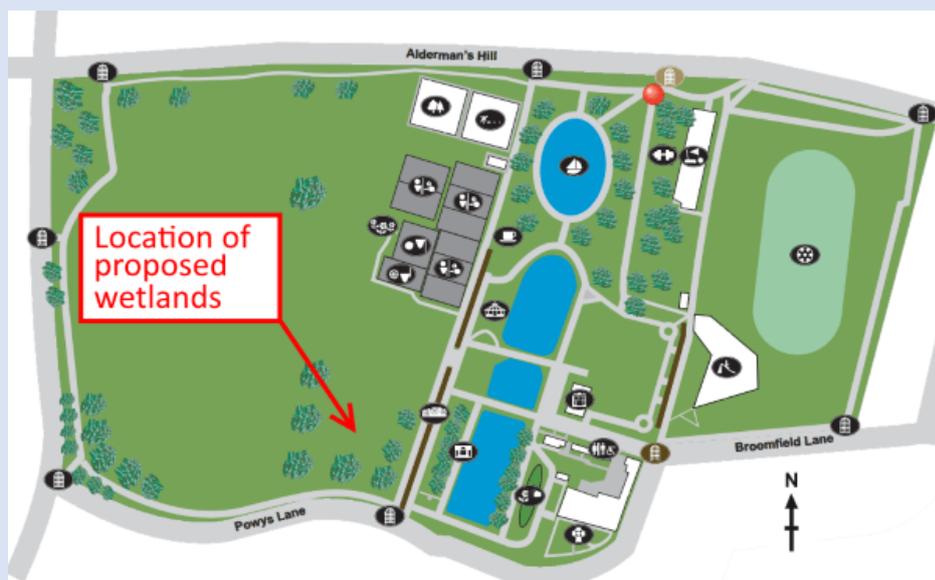


Image source: Friends of Broomfield Park¹⁰⁷

Partners

This Enfield Council projects is also supported by Thames 21, World Wildlife Fund (WWF), Rivers Trust, Coca Cola Foundation, Coca Cola European Partners, Friends of Broomfield Park and Interreg North Sea Region.

Funding sources and amounts

The Broomfield Park wetland has been funded by the Coca Cola Foundation. The project is being managed by Enfield Council with support from Thames 21 and Friends of Broomfield Park¹⁰⁸.

Progress made and plan for future

Having received planning permission in November 2018¹⁰⁹, great progress had been made with the wetland area having been excavated and more recently planted. The local community were offered the chance to connect with this project through volunteering to plant reed beds for the wetland on 21st May 2019¹¹⁰.

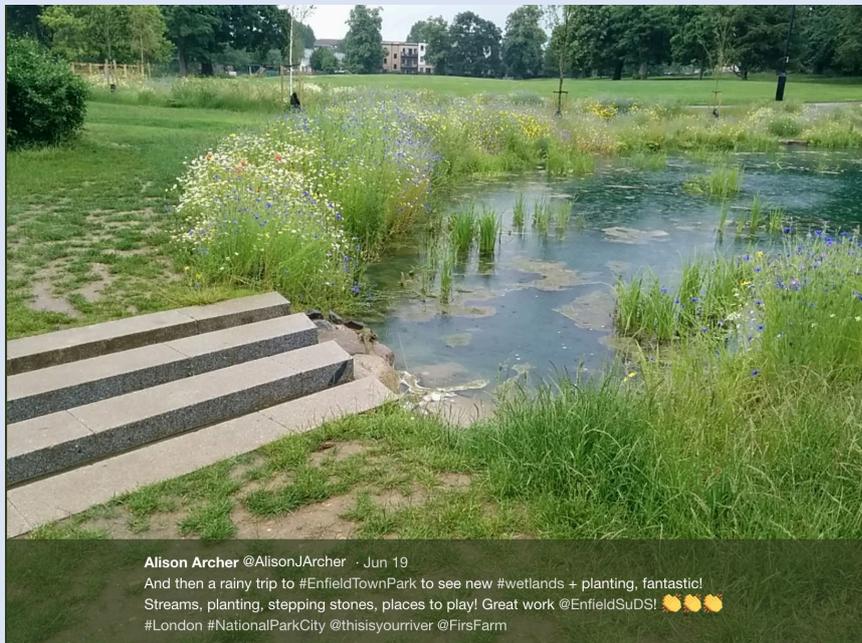


Image source: Alison Archer retweet on @EnfieldSuDS Twitter account¹¹¹

25 YEP goals

Through improving water quality in the Pymmes Brook this project delivers towards improving the water status of the Lower Lea, one of the most polluted catchments in the UK¹¹². This will help meet the 25 YEP target to help restore 75% of waters to their natural state as soon as possible.

Improving biodiversity contributes to the third 25 YEP goal of thriving plants and wildlife and reducing flood risk contributes towards goal 4, reducing risk from environmental hazards. Providing opportunity for contributing to the project and creating the wetland in a public access space also contributes towards goal 6, enhanced engagement with the natural environment.

Lead Local Flood Authorities

Risk Management Authorities deliver national flood and coastal erosion risk management policies. The Risk Management Authorities are: Environment Agency, Lead Local Flood Authorities, District and Borough Councils, Coast Protection Authorities, water and sewerage companies, Internal Drainage Boards and Highways Authorities¹¹³.

As a result of severe flooding in 2007 the Pitt review was commissioned and following its report the government committed to implementing its 92 recommendations. The report recognised that there was confusion around which organisations held flooding responsibilities and led to the creation of Lead Local Flood Authorities and Regional Flood and Coastal Committees to provide oversight.

Remit

Lead Local Flood Authorities (LLFAs) manage local flood risks from surface water, smaller watercourses and groundwater. Their responsibilities are listed under the Flood and Water Management Act 2010¹¹⁴, including:

- Engage and consult local stakeholders in preparing and maintaining an agreed strategy for local flood risk management
- Carry out local works
- Investigate, and publish information on, significant local flood incidents
- Cooperate with other Risk Management Authorities
- Provide advice on the impact of major developments (10 dwellings or more) to Local Planning Authorities¹¹⁵.

Structure

Unitary authorities, and in their absence county councils, are the Lead Local Flood Authorities for their areas.

Delivery

The 2017 Evaluation of the arrangements for managing local flood risk in England report shows that Lead Local Flood Authorities have played an important role in improving local flood risk understanding and risk management. Findings from the evaluation included:

- *The FWMA [Flood and Water Management Act] requirement to produce local flood risk management strategies has led to a more comprehensive understanding of local flood risk and a more proactive and coordinated management of this risk;*
- *There was anecdotal evidence that actions implemented as a result of local flood risk management strategies being developed have reduced flood risk;*
- *There were widespread perceived benefits in terms of improved collaboration between risk management authorities and improved prioritisation of action to address local flood risk¹¹⁶.*

Areas for improvement were highlighted as getting all LLFA strategies published and strengthening assessments of costs and benefits. With the evaluation having been published in January 2017 these improvements may now have been made.

Funding

Lead Local Flood Authorities are mainly funded through the Local Government Financial Settlement. The Ministry of Housing, Communities and Local Government reported that in 2019-20 Lead Local Flood Authorities' settlement funding stood at £32,964,944¹¹⁷. This is supplemented by a separate grant to ensure that funding levels meet the real term commitment made by government¹¹⁸.

Delivering against 25 YEP

Reducing the risk of harm from environmental hazards, including flooding, is a key 25 YEP aim. LLFAs are contributing towards this aim by advising on local flood risk to ensure planning decisions reflect that risk and working to manage flood risk in partnership with other stakeholders. As with local authorities more broadly, LLFAs often suffer with resource challenges that hamper their ability to properly scrutinise and provide advice on development schemes so that they deliver the best flood resilience and wider environmental benefit.

National Park Authorities

National Parks have a long history. The first National Park was designated in 1951 following decades of campaigning for improved public access to the countryside¹¹⁹.

Remit

The statutory purposes of National Parks in England and Wales is set out in the 1995 Environment Act as:

- “conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified”, and
- “promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public”¹²⁰.

Each National Park has a National Park Authority to deliver against this remit.

Structure

National Park Authorities are part of local government. Each National Park Authority is made up of members, staff and volunteers.

The ten National Park Authorities in England are represented by National Parks England who work to improve communication with National Park Authorities in the devolved nations, make the case for protection of the parks and ensure government support.

As a key recommendation, the recent Glover review of National Parks suggested that a new National Landscapes Service be established to “act as a unified body for England’s 44 national landscapes, including 10 National Parks and 34 AONBs”¹²¹.

Geography

Britain has 15 national parks; 10 in England, two in Scotland and three in Wales. These were designated over time, with the Peak District being confirmed as a National Park in 1951 and the South Downs National Park in 2010¹²². The Glover review has also recommended backing for a new National Park in the Chilterns and a new National Forest¹²³.

Delivery

National Parks cover large areas of land. Some of this land is owned by the National Park Authorities but the majority is privately owned by farmers and organisations such as the National Trust and Forestry Commission.

National Park Authorities work alongside private landowners to manage the land in ways that protect the landscape as well as undertaking practical management, such as maintaining rights of way. They also run tourist centres and engage in education of future generations to support public understanding and access to the landscape.

Volunteers contribute to delivery in National Parks through: “leading guided walks, fixing fences, dry stone walling, checking historic sites and surveying wildlife”¹²⁴.

A national overview of the types, extent, cost and benefits of management undertaken is not compiled and would be a useful resource.

Funding

Costs are met by government grants, external grants and visitor income. The amount of government funding that National Park Authorities receive is not clearly reported. In 2018-19 "other authorities" (Combined Authorities, Waste Authorities, Transport Authorities and National Park Authorities) revenue expenditure was £1,096 million¹²⁵. However, there is no information on the split of that funding between the bodies.

National Parks have previously suffered from government funding cuts¹²⁶ which the Campaign for National Parks has lobbied against, providing briefing on the impact of funding cuts including examples of projects discontinued or scaled back¹²⁷. In 2015, Defra pledged to increase direct grants by 1.72% annually up to 2020 for most National Parks¹²⁸.

National Parks Partnerships was set up create partnerships with businesses. Several partnerships have been set up to support delivery of the National Parks aims in ways that benefit businesses too. Current partnership opportunities include connecting children to nature and improving National Park accessibility¹²⁹.

Delivering against the 25 Year Environment Plan

The 25 YEP has a specific target linked to National Park Authorities; "Working with National Park Authorities to continue to deliver the 8-Point Plan for National Parks 2016-2020"¹³⁰.

The plan covers:

- 1. Connecting young people with nature**
- 2. Creating thriving environments**
- 3. Driving growth in international tourism**
- 4. Delivering new apprenticeship schemes**
- 5. Promoting British food from national parks**
- 6. Encouraging more diverse visitors and volunteers to the parks**
- 7. Working with the Heritage Lottery fund to enhance the landscapes and heritage of the national Parks**
- 8. Promoting innovative schemes to improve health and wellbeing through recreation**¹³¹.

National parks are making progress towards these goals. For example, the 25 YEP reports that National Park Authorities have already met their target to engage 60,000 young people a year in schools visits.

Working with other stakeholders may help National Park Authorities access additional expertise and innovative funding streams and resource to extend this work as well as allow delivery against wider 25 YEP goals linked to the environment, such as flood risk reduction.

Local Nature Partnerships

Remit

The first Local Nature Partnerships (LNPs) were announced in July 2012¹³², following their recommendation in the 2011 white paper *The natural choice: securing the value of nature*¹³³. The purpose of LNPs is to drive positive environmental changes at a local level. The 2012 DEFRA overview of the Local Nature Partnership role¹³⁴ stated the three main themes LNPs are expected to deliver against as:

1. Sustainable land use and management
2. Green economic growth, and
3. Quality of life, and local health and wellbeing.

These broad themes give LNPs great flexibility in prioritisation and delivery. This allows locally important issues to be addressed but doesn't encourage consistent delivery. For this reason, some argue that the objectives of LNPs could benefit from review and clarification.

The 2012 Defra overview report also suggested a number of activities to meet these themes, including to: promote biodiversity offsetting, develop and promote nature access opportunities, and engage with health professionals on the value of the natural environment, which are also 25 YEP goals.

Structure

LNPs are made up of Defra family representatives, local organisations (such as Wildlife Trusts or branches of national NGOs), council representatives, businesses and individuals who want to deliver for the local environment. LNPs work to deliver their shared strategic vision within their partnership area, which addresses the three themes above.

Geographical Extent

LNP status is awarded by the government to suitable partnerships. Geographic boundaries were not set by Natural England, instead LNPs were encouraged to "establish the most appropriate boundary for their area, whether it is ecological, administrative or a mixture of both"¹³⁵.

There are 47 LNPs covering most of England, including rural and urban areas¹³⁶. Coverage is lacking in Essex and Rutland, but other areas are covered by more than one LNP. For example, Plymouth LNP overlaps the Cornwall and Isles of Scilly LNP and the Natural Devon LNP. Where there are overlaps there should be an agreement in place as to how common areas will be managed.

Funding

When LNPs were being established DEFRA made £1million available to those looking to gain LNP status to allow them to build capacity. This was followed by Natural England making £500,000 available through small grants over a few years¹³⁷.

LNPs are not government funded; they are expected to be self-sustaining, securing funding and other support for their work themselves. Securing funding has proven challenging for many LNPs and lack of finance raises concerns as to whether LNPs can sustain their work in the long term. In 2015, the Environmental Audit Committee stated:

Many LNPs are starved of funding and resources, meaning much of the good work in getting them up and running, is being undone. The whole country—urban as well as rural—need the natural environment protections that LNPs can provide. Rather than leave under-performing LNPs to wither away, the next Government should urgently review LNPs and their funding, and re-energise the initiative.¹³⁸

Given that no government funding has since been provided, local authorities' budgets are under considerable pressure and private finance is often difficult to obtain, the statement remains appropriate today.

Delivery

As is an issue with some other delivery organisations, there is no publicly available annual reporting on the functioning of LNPs. Adequate reporting and robust scrutiny and audit are needed for LNPs, and all other organisations, to prove success and justify government funding.

LNPs do not provide a coherent national delivery network due to their inconsistent geographical coverage and varying delivery levels between partnerships.

Delivery levels and activities vary between LNPs partly because they are reliant on voluntary capacity, which varies between partnerships, and partly because partnerships interpret their remit differently. Some LNPs are focused on delivering small scale projects in partnership whereas other achieve sustainable land uses through influencing wider planning and delivery.

LNPs have the remit to engage with the local planning system and it was envisaged that they would push the economic and social benefits that the environment can provide. LNPs do not have a duty to cooperate, if this was imposed they would need adequate funding to comply.

Case Study: Bedfordshire LNP



Led by Bedfordshire LNP, the Natural Environment Partnership (Buckinghamshire and Milton Keynes' LNP), Northamptonshire LNP and Natural Cambridge (LNP for Cambridge) have examined how natural capital investment could sit alongside the National Infrastructure Commissions' proposals for economic growth and housing in the Oxford- Milton Keynes- Cambridge corridor¹⁴¹.

The project was funded by Defra, Bedfordshire and Buckinghamshire LNPs and the Natural Environment Research Council and resulted in a written report and two new proof of concept tools to help assess the impacts of new infrastructure routes and the value of new habitats¹⁴².

Through consideration of natural capital in this way and engagement in the planning process the LNPs are contributing to the 25 YEP target of "Working with interested parties to improve and expand the range of tools and guidance that support biodiversity net gain approaches, including through the future incorporation of natural capital measures".

The government has since committed to mandating biodiversity net gain for development, as raised in the Spring Statement¹⁴³.

Relationship with LEPs

In 2016 it was noted that “the 39 LEPs have been allocated £12 billion of local growth funding to spend over the next five years. By contrast, LNP funding so far amounts to less than 0.02% of this”¹⁴⁴. The government has in the past suggested that LNPs seek financial support from Local Enterprise Partnerships (LEPs)¹⁴⁵. However, it has also been suggested that LNPs have a role to play in holding LEPs to account. The power imbalance that funding dependence could create would likely impact on how able LNPs felt to fulfil that objective role.

LNPs are seen by some as the environmental counterpart to LEPs, and cross partnership working has been encouraged. If LNPs and LEPs took a more co-ordinated approach to the policies and development in their common areas this could provide outcomes that better balance the needs of businesses and the environment.

In 2018, a Campaign to Protect Rural England survey found that “50% of LEPs work with LNPs and other similar groups”¹⁴⁶, leaving room for improvement. LEPs have worked with LNPs in a variety of ways including: having LNPs on their stakeholder groups, LNPs attending board meetings, co-hosting LNP events, collaborating to up to level three of the Local Environmental and Economic Development toolkit¹⁴⁷. Two possible factors contributing to the lack of partnership working could be that the geographical areas of the LNPs and LEPs do not generally match and that LNPs lack the levels of funding that is necessary to facilitate the time intensive process of cross partnership working.

Delivering against the 25 Year Environment Plan

LNPs have a wide remit that, dependent on its interpretation, could facilitate delivery against nearly all 25 YEP goals with the exceptions of minimising waste and managing exposure to chemicals.

More specifically the suggested activities in the 2012 DEFRA overview of the Local Nature Partnership role indicate that net gain, improved access to green spaces for wellbeing and engagement with health professionals to improve recognition of the value of the natural environment would be a particularly good fit.

Funding is clearly an issue for LNPs and limits how strategically partnerships can plan and deliver against national priorities. Lack of funds also limits participation in partnership working which is an effective way to improve integration of delivery to meet national aims. Adequate reporting and robust scrutiny and audit are needed for LNPs to be able to justify government funding.

There is scope LNP and LEPs to have closer working relationships. This would help balance economic growth demand with mitigation of associated environmental impact and local nature recovery. To ensure this happens, both organisations are likely to need stronger direction on involvement.

Local Enterprise Partnerships

Local Enterprise Partnerships (LEPs) were created to replace Regional Development Agencies, meeting plans outlined in the Coalition Agreement¹⁴⁸ of the 2010-2015 government. LEPs are voluntary groupings of local authorities and businesses. The first 24 LEPs were approved in June 2010 with a further 15 LEPs subsequently approved. Following the closure of Cambridge and Peterborough LEP, there are now 38 LEPs covering England.

Remit

The role of LEPs was set out in the 2010 paper *Local growth: realising every place's potential*¹⁴⁹. Alongside economic aims on investment, regulation and job growth the paper stated duties to contribute to national planning policy and to deliver against national priorities, which the 25 YEP is.

Since 2010 the role of LEPs has developed to include Enterprise Zones¹⁵⁰ and delivering Growth Deals. LEPs are now considered an important group for delivery of the government's devolution agenda. However, the National Audit Office¹⁵¹ noted in 2016 that LEPs often feel uncertain of their role within a more devolved landscape, particularly where their boundary does not match that of their combined authority.

Recognising this, the government's 2017 Industrial Strategy¹⁵² committed to working with LEPs to set out more clearly defined objectives and activities. The government published its review *Strengthened Local Enterprise Partnerships*¹⁵³ in July 2018 which promised a government statement on the role and responsibilities of LEPs.

We suggest that given the government's commitment to environmental recovery, this statement should cover how LEPs can meaningfully enable environmental regeneration alongside growth and require that LEPs have a specified environmental expertise component to them. This would underpin the valuable contribution that a healthy environment makes to a healthy economy.

Structure

The government requires that each LEP must be chaired by a businessperson and at least half of the members must be from the private sector. This leaves LEPs with a lot of flexibility as to who they involve, allowing them to choose people with useful expertise for their area, including environment and nature recovery.

The LEP Network provides an online space for LEPs to share knowledge and best practice. The Network has a Steering Group, open to the chairs of all LEPs, which sets overall direction for LEPs.¹⁵⁴

Geographical Extent

There are 38 LEPs covering the whole of England, a map of which can be found on the LEP Network website¹⁵⁵.

In suggesting boundaries, those proposing LEPs were encouraged to reflect areas of functional economic activity. Perhaps as a result of this policy, many LEPs are centred on urban areas.

It has been argued that the boundaries chosen for LEPs are unnatural and were more politically than economically driven¹⁵⁶ which hinders their ability to encourage private sector growth. Others feel that rural areas are not well supported, which can be attributed to funding issues as well as LEP borders.

The LEPs vary in size, from relatively small areas such as the Black Country to a large part of the South West. There are several areas of overlap, as is also the case for LNPs.

Funding

The funding received by LEPs has been far greater than that allocated to LNPs, but it has mostly been delivered through a series of short-term commitments described as “fragmented and over-complex”¹⁵⁷.

Funding has been provided as follows:

- 2011- government provided £5 million start-up fund for LEPs
- 2011-13- Regional Growth Fund made 43 awards to LEPs, worth £433 million
- 2012/13- LEPs were all offered £125,000 for the 2012/13 financial year
- 2013- Vince Cable announced £5.3 billion between 2014 and 2020
- 2018- Commitment in the Strengthened Local Enterprise Partnership Review of “up to £20 million between 2018-19 and 2019-20 in additional capacity funding to support Local Enterprise Partnerships”¹⁵⁸
- By 2016- £7.3 billion Growth Deal funding had been allocated to LEPs
- By 2017- LEPs had received £730 million from the Growing Places Fund
- By 2021- LEPs will have received £12 billion through the Local Growth Fund

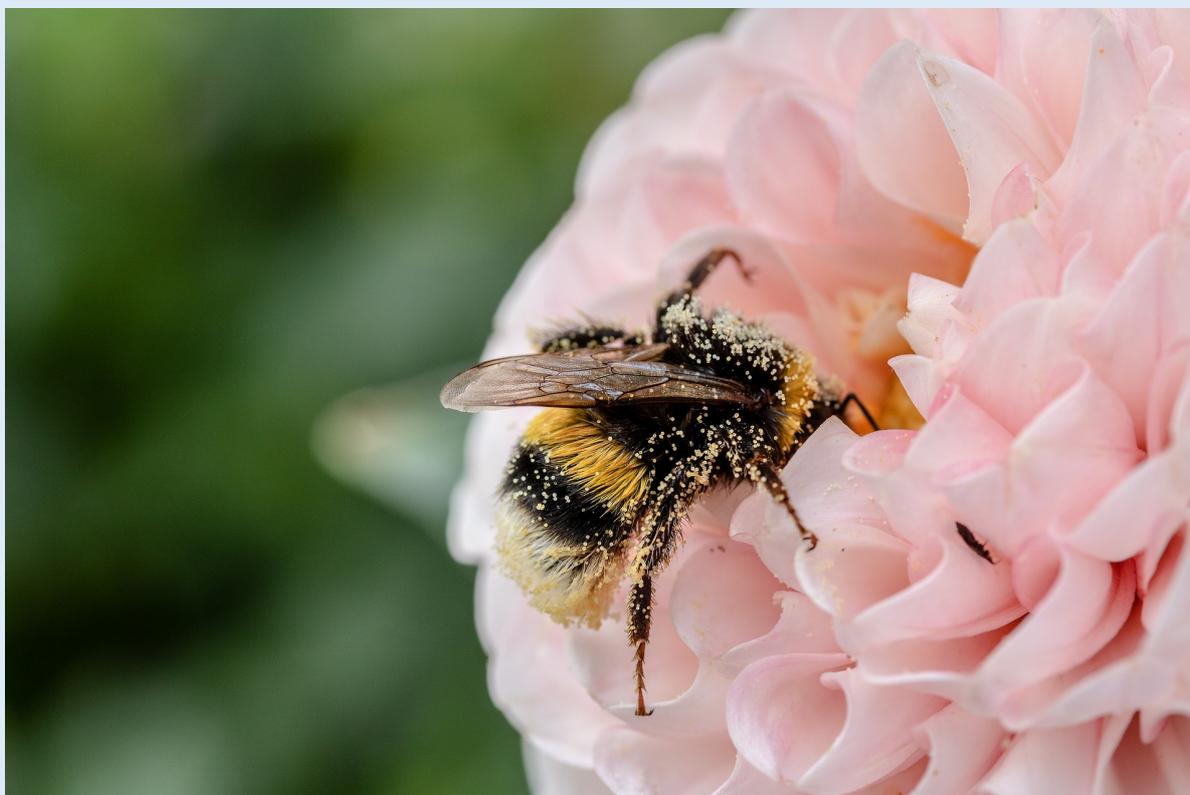
Despite the level of public money provided this has not been effectively used to leverage significant private investment, with the last NAO report stating that “private sector contributions have not yet materialised to the extent expected”¹⁵⁹.

LEPs report on how they have managed their funding by adhering to the National Assurance Framework. LEPs assurance frameworks are signed off and certified annually by ‘Section 151 Officers’ in partner local authorities¹⁶⁰.

Delivery

Following an investigation in 2017 the Cambridge and Peterborough LEP was closed in 2018, however other LEPs have been very successful, including Coast to Capital, Enterprise M3, Greater Lincolnshire, and Heart of the South West LEPs.

Case study: Connecting Habitats with Gfirst LEP



Gfirst (Gloucestershire) LEP is working with Cheltenham Borough Council to help them deliver on their ambition to create and connect habitats in central Cheltenham to provide a local network for biodiversity¹⁶¹. The network will link to existing green spaces on the edge of the town which will also be enhanced for biodiversity. Planting will look to support target species through providing food sources and nesting cover¹⁶².

Through improving green infrastructure the project looks not only to provide benefits in the form of increased biodiversity but also enhanced flood resilience through decreasing impermeable surface area and runoff rates¹⁶³. In these ways the project will contribute towards multiple 25 Year Environment Plan goals including: supporting wildlife, creating green infrastructure, improving access to green space in urban areas, and mitigating flood risk.

The project has a funding allocation of £1million¹⁶⁴, with £635,000 provided by the European Regional Development Fund¹⁶⁵.

The Connecting Habitats project started April 2017 and is set to be completed December 2019.

More broadly, there are a range of concerns surrounding the delivery provided by LEPs. Problems relate to finance, capacity, transparency and reporting, and clarity of objectives.

Alongside the fragmented provision of funds, a key financial issue is that short delivery deadlines for job growth are attached to funding. The result is a focus on fast job growth which can most easily be achieved in urban areas where there are more large businesses, opposed to rural areas which might typically have more SMEs and microbusinesses.

Whilst this provides fast job growth, the NAO noted in 2016 that the projects pursued do “not necessarily optimise value for money”. This may be because the funding structure doesn’t encourage strategic investment for long term growth. Alongside failing to provide the most meaningful results, this funding model facilitates an imbalance in opportunity in rural and urban areas creating potential for social injustice.

Capacity will vary between LEPs and plays a role in the inconsistency of delivery. The capacity of LEPs is determined not only by funding but also by the availability and skills of people willing to be involved. It was noted by the NAO that LEPs are often dependent on local authorities, for administration support and expertise, which given budget cuts is an unsustainable approach.

A lack of human capacity can make it difficult for LEPs to take advantage of funding opportunities that may be available, limiting delivery. In 2013 the NAO raised concerns of “weaknesses in leadership, changes in board membership... and insufficient administrative capacity”¹⁶⁶. These concerns were evidently not adequately addressed as in 2016 the NAO were unable to report improvements, instead stating that “LEPs do not have an established track record of delivery” and “LEPs themselves have serious reservations about their capacity to deliver”¹⁶⁷.

Reporting and transparency deficiencies, and unclear delivery objectives, contribute to the lack of an established track record of delivery. On reporting transparency, the House of Commons Committee of Public Accounts stated in 2017 that “the varying presentation and detail of financial information across LEPs also makes it difficult to draw meaningful conclusions or make comparisons across LEPs on how they spend public money”¹⁶⁸. By expansion this will also make it difficult to compare the effectiveness of LEPs with other organisations making funding allocation between organisations difficult.

In a bid to improve transparency and governance of LEPs, the government published guidance¹⁶⁹ earlier this year which LEPs are expected to follow. The guidance covers confidential reporting procedures, whistleblowing policy, codes of conduct and registers of interest.

A Lack of quantifiable objectives for delivery, particularly for Growth Deals, also make it difficult for LEPs to monitor and report their successes. Having some broad metrics to measure delivery would help improve the ability to compare LEPs without hindering delivery by encouraging too narrow a focus. Following recognition in the industrial Strategy of LEP uncertainty around delivery objectives, guidance on defined objectives is expected to be developed.

Delivering against the 25 Year Environment Plan

Campaign to Protect Rural England (CPRE) found that the vast majority of LEPs felt under resourced, with only 5% satisfied that they could meet government expectations with the resources available to them. Significant concerns around human capacity were voiced, “69% of LEPs reported that they did not have sufficient staff and 28% did not think that their staff were sufficiently skilled”. This suggests that despite recent funding LEPs do not feel well placed to meet their existing responsibilities indicating that their capacity to take on further delivery is limited.

Not all LEPs feel able to work effectively as strategic entities. Their remits should be reviewed, and their human capacity increased such that they can deliver effectively against both short and long term aims.

Given the comparatively high level of funding LEPs have received, it may be appropriate to allow a greater proportion of existing funding to be invested in building human capacity rather than increasing overall funding levels. Alternatively to overcome capacity limitations LEPs could work more collaboratively with organisations who lack funds but have greater human capacity and expertise. Through linking up with other organisations LEPs could direct funding towards environmental measures which make places healthier, more productive and ultimately more able to attract private investment.

If the challenges raised were addressed, LEPs could help meet national priorities set out in the 25 YEP, in particular:

- Supporting net gain being brought into the planning system**
- Working with businesses to develop innovative funding mechanisms that could support delivery of the plan’s goals**
- Actively partnering with LNPs and other organisations to drive funding and investment into improving green and blue infrastructure which will make places more attractive, healthier, productive and investible.**

Catchment Based Approach

Nature works as a system in the way it provides ecosystem services, so addressing individual issues in isolation cannot provide maximum benefit¹⁷⁰. Catchment based approaches look to recognise the interdependencies within water catchments and manage the environment in a holistic way over the long term. Approaches can work by deploying a range of small-scale interventions which cumulatively deliver larger benefits. For example, for the Stroud Rural SuDS Project the District Council has worked in partnership with others to install over 250 low cost flood alleviation features across the 235km² catchment to slow water flows and help mitigate flooding¹⁷¹.

The most well-known catchment initiatives are the Catchment Based Approach (CaBA) and Catchment Sensitive Farming (covered within statutory bodies).

CaBA was first trialled between 2011 and 2013. During this time 25 pilot partnerships were hosted by a variety of organisations, including water companies and local authorities. The pilots were considered successful, with DEFRA noting that the Catchment Based Approach was “emerging as a key mechanism to better integrate decision making and ‘on the ground’ delivery in relation to water and the environment within a wider socio-economic context”¹⁷².

Remit

In 2013, DEFRA proposed a policy framework for the expansion of CaBA, providing two objectives for the initiative:

- “To deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and
- To encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.”¹⁷³

Within these it was expected that pollution issues would be tackled and that the approach would support development of ambitious River Basin Management Plans¹⁷⁴ to speed up delivery against the Water Framework Directive.

Geographical Extent

There are over 100 catchment partnerships across England, and cross border with Wales. The boundaries for CaBA are the same as those for which the Environment Agency deliver river basin management planning under the Water Framework Directive. These boundaries reflect the natural hydrological catchments. This works well for water issues planning as it encourages impacts to be considered across the whole system, with water a common factor in the management of pollution, flood, drought and ecosystem services. However, these boundaries misalign with those of other organisations such as local authorities.

Structure

There is no prescribed structure for the partnerships, in regulation or otherwise. This reflects the voluntary nature of participation which allows engagement across sectors.

Catchment partnerships are made up of a range of people with local and environmental interests, including businesses (such as water companies), land managers and local individuals. They also often work alongside delivery organisations with statutory remits, such as the Environment Agency and local authorities. Levels of stakeholder diversity vary between partnerships. Diversity is valuable in identifying catchment issues and generating solutions.

All CaBA partnerships have developed a catchment plan capturing a collectively agreed set of priorities for action, underpinned by data and evidence. Catchment partnerships are supported by the CaBA National Support Group (NSG) through: a data package with over 200 layers covering aspects of integrated catchment management, newsletters, working groups, training sessions including mentoring and practical skills, and a website which provides public access to best practice guidance documents and case studies. The NSG also provides strategic oversight and horizon scanning to help partnerships respond to changing policy environments.

There is a perceived issue around the legitimacy of partnerships, stemming mainly from issues of funding uncertainty. This is being addressed through seeking sustainable funding sources, working with more formally recognised groups, and building local support by instilling confidence in delivery partners and stakeholders.

Funding

At the end of the catchment pilots it was noted that funding uncertainty had resulted in partnerships taking a cautious approach¹⁷⁵. The 2013 policy framework for CaBA stated that “to work effectively[...], partnerships working at catchment level will need to secure long term, self-sustaining, local funding arrangements”¹⁷⁶.

Currently each CaBA partnership receives £15,000 host funding per year towards their costs¹⁷⁷. This funding is determined by annual rather than multi-annual budgets. Direct Environment Agency funding is also provided where successful bids are made for catchment-based funds. Overall this direct funding totalled £3,529,556 across partnerships in 2017/18.

Partnerships use this money to lever additional funds. The 2017/18 ratio of direct CaBA funding to non-governmental funds was £1: £6.50, with non-governmental funding of £22,938,793 secured¹⁷⁸. The success in leveraging funds varies between partnerships and projects, with regional scale projects being more able to raise funds than local projects, but less frequently delivered¹⁷⁹. The 6.5 multiplier reflects a growing ability within partnerships to draw upon an increasingly diverse range of funding sources.

CaBA NSG is building business support through the CaBA Water Stewardship Service (which is funded by business to encourage collaborative action), WWF-UK, Courtauld 2025, Business in the Community and the Catchment Declaration¹⁸⁰. Individual partnerships also look to engage businesses. Engagement with business is important for bringing in expertise and new funding opportunities that can help diversify the funding base.

Funding sources are summarised by figure two below, including significant further government funding through indirect routes and a variety of non-government sources.

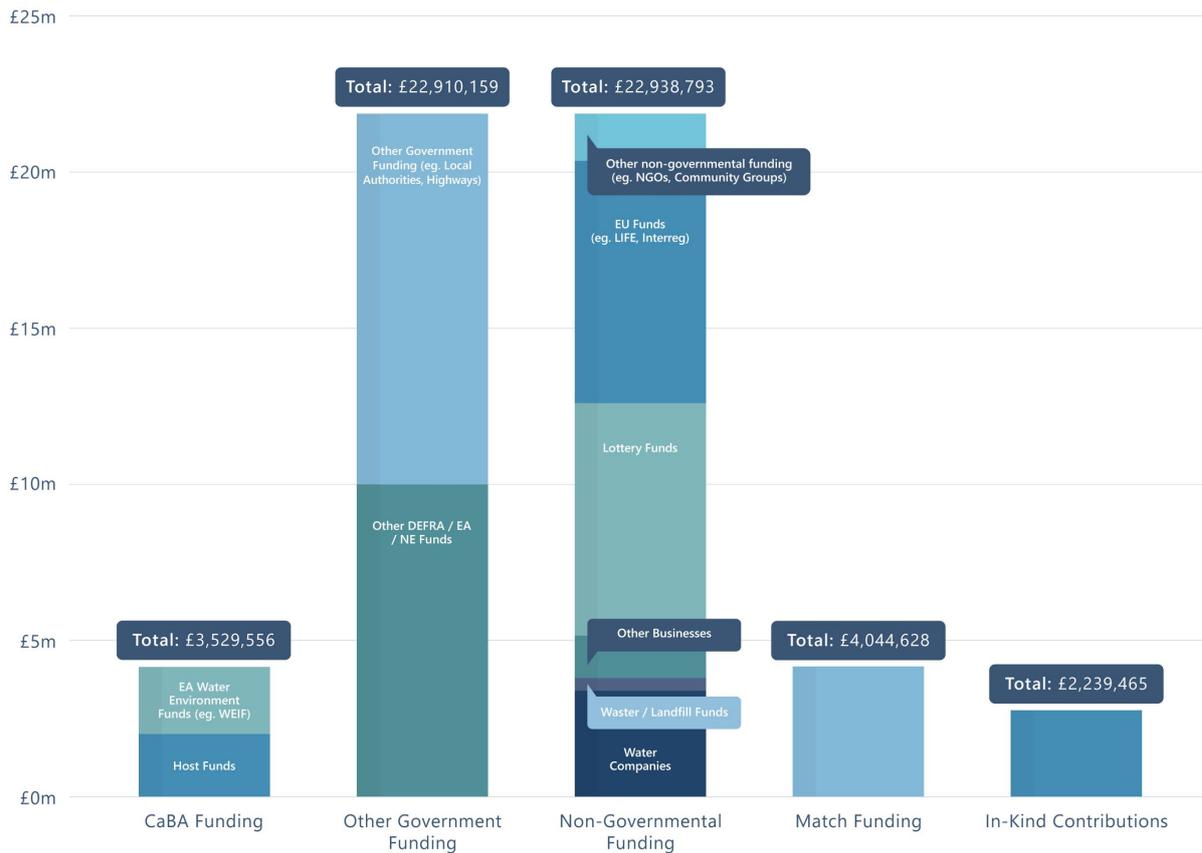


Figure two: CaBA funding sources, adapted from CaBA Monitoring and Evaluation 2017/18 report¹⁸¹.

Whilst funds are being obtained by CaBA partnerships, the relative insecurity of the host funding (government funding is only confirmed on a rolling annual basis) and of funds secured through active fundraising does not support a long-term approach to project planning and delivery. We consider the ability to deliver long-term projects essential to delivering nature recovery, and a healthier environment, at the scale envisioned by the government.

Delivery

Delivery can be assessed against the objectives of CaBA and the stated measures for success.

The CaBA objectives are provided above as improving the water environment by promoting local understanding and encouraging local collaboration. The measures for success were stated in DEFRA's 2013 report as:

- Stakeholders are closely involved in identifying priorities and taking action to address them.
- Stakeholders understand their role in the CaBA and their influence on river basin planning.
- Additional joint action and external investment is leveraged, with Defra delivery body officers providing key input into the securing of resources.

- *Measures are planned in a more coordinated, strategic and better targeted way that takes account of ecosystem function.*
- *Different planning systems and plans are brought together in a synergistic way, with common strategic and spatial points of reference¹⁸².*

The work of partnerships is varied, though the top themes for delivery are; Water Framework Directive, river habitat restoration, water biodiversity and habitats, and diffuse pollution. The CaBA monitoring and evaluation report also identified Natural Flood Management as an emerging focus, on which more than half of partnerships now have projects.

Whilst national benefits reporting is very competent, measurement and reporting of benefits derived from local projects is limited; both in the proportion of projects that are monitored (44%¹⁸³) and the measures that can be used.

There are several reasons why projects are not monitored, for example: limited funding, costs of monitoring are disproportionate to the benefits, lack of capability, project not yet in delivery phase, or the project was itself on data analysis.

Often the benefits provided cannot be measured so proxy measures are used instead, for example; hectares of habitat created (2,835), km enhanced (957), and barriers to fish migration mitigated (94), for which the 2017/18 figures are shown in brackets¹⁸⁴. It is also difficult to value these benefits and therefore hard to understand how much value the initiative provides for the funding secured.

Enhanced funding, with a requirement to monitor environmental, social and economic benefits arising would help to address this issue. The 25 YEP places emphasis on monitoring and metrics; efforts in these areas should be supported.

As with LNPs and LEPs, the local and voluntary nature of CaBA dictates that delivery will vary between partnerships based on local capacity.

The wide variety of stakeholders involved indicates that partnerships consider the views of many individuals, including those involved in schemes operating at different spatial scales. In December 2018 it was reported that there were over 14,000 volunteers and citizen scientists involved with CaBA¹⁸⁵. This level of social engagement in delivery is impressive and not seen in many other initiatives.

The 2018 CaBA monitoring and evaluation report provides an example of engaging with other delivery organisations in LEPs, stating "two partnerships report funding from Local Enterprise Partnerships (LEP) during 2017/18 with 54 partnerships reporting at least some form of engagement with a LEP and/or LEP awareness of their work"¹⁸⁶. This is to be welcomed and should be further encouraged.

CaBA's ambition to improve planning at a regional level is also resulting in involvement in initiatives that aim to consider the views of various stakeholders. This can be seen in the Natural Course¹⁸⁷ EU funded LIFE Integrated Project to improve the quality of water in the north west of England. This is providing co-finance to bolster the work of the CaBA mentoring team with some tangible success, including the strengthening of catchment plans

and a step-up in the north-western partnerships success in securing additional funding. For more information see the case study below.

Even taken together, this delivery does not yet provide evidence that “plans are brought together in a synergistic way, with common strategic and spatial points of reference” however it indicates a reasonable foundation. The report highlighted potential for further engagement with local authorities, Local Enterprise Partnerships (LEPs) and health authorities, which would help improve delivery against this measure of success. Additionally, closer working with RFCCs would be advantageous.

Delivering against the 25 Year Environment Plan

CaBA has great potential to deliver benefits for the water environment nationally and is already delivering benefits locally. CaBA is already contributing to meeting 25 YEP goals on: clean and plentiful water, thriving plants and wildlife, reducing environmental hazards, using resources from nature more sustainably and efficiently, and increasing engagement with the natural environment.

CaBA could deliver more effectively against the 25-year environment plan if collaboration is improved between organisations operating across different geographies and scales. Improving collaboration with other organisations has been identified as an area for attention by the CaBA NSG, with particular focus on LEPs, local authorities and health authorities.

Currently delivery is most commonly focused on local level projects, which is partly a product of being reliant on project specific funding, though involvement in wider scale strategic issues is being developed. Continued development of cross scheme collaboration and inclusion of national and regional priorities in Catchment Plans are needed to ensure both national and local priorities are met.

Greater funding certainty across multiple years would provide significant opportunities to enable a more strategic and long-term approach to planning and project delivery.

Case Study: Natural Course

Project Overview

Natural Course is a LIFE Integrated Project funded by the European Union. It is an eight and a half year project with the objective of increasing implementation of the Water Framework Directive (WFD) in North West England. The project aims to build collaborative working between key organisations active in the water management sector, to showcase collaborative and innovative working and to mobilise additional funding to address WFD issues in the region. Natural Course is a multi-faceted project, with part of it directly focussed on supporting the Catchment Based Approach (CaBA) partnerships in the North West.

Overview of CaBA Partnership Support

A major component of the Rivers Trust's activities on Natural Course has been to provide support to the CaBA partnerships. This has been a two-pronged approach: on one side providing funding for dedicated staff positions for catchment partnership hosting; and on the other side providing technical advice and mentoring to CaBA hosts. This support has aimed to increase engagement within the catchment partnerships in the North West, and to develop high-quality catchment management plans.

Geographic Area Covered

Natural Course focusses specifically on the North West River Basin District, as shown in the following image. Approaches tested will also be shared outside of the North West.

Partners Involved

The five main partners of Natural Course are the Rivers Trust, the Environment Agency, United Utilities, Greater Manchester Combined Authority and Natural England. There are also a number of additional partners working on Natural Course through affiliation with one of the main partners. In the case of the Rivers Trust, these affiliated partners include all the CaBA hosts in the North West River Basin District.

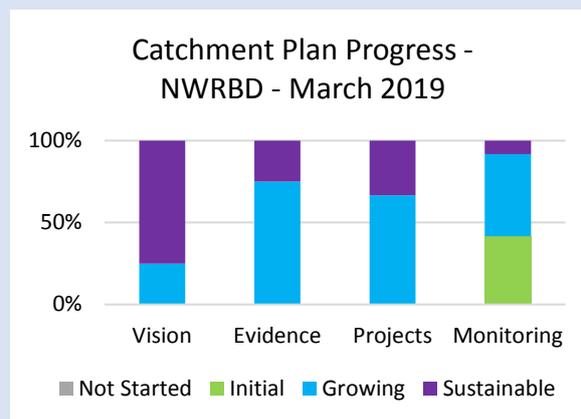
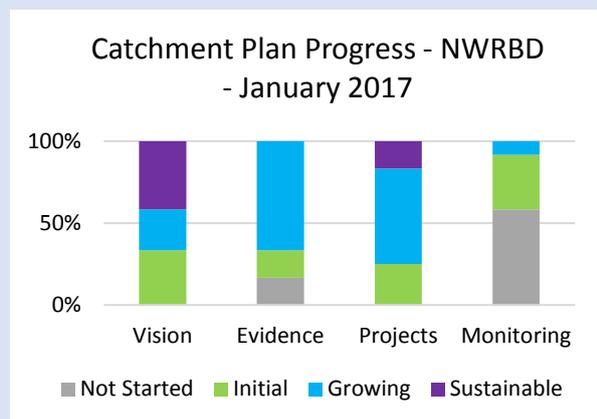
Funding Sources & Amounts

Natural Course has an overall budget of £17 million with the EU LIFE grant contributing £10 million. The remaining funding comes from a variety of different sources, depending upon the individual activity. The activities directly supporting CaBA partnerships entailed a budget of £1.1 million, with the EU LIFE grant contributing £665,000 and the remaining £435,000 coming predominantly from Defra & CaBA.



Progress Made & Plan for Future

Natural Course supported the CaBA partnerships from October 2015 to March 2019. This has helped CaBA hosts increase engagement with their catchment partnerships, leading to increased dialogue with stakeholders, identification of issues, and development of new project ideas/ proposals. It has also enabled good progress on developing sustainable catchment management plans. The images below show the development of catchment management plans in the North West River Basin District as of January 2017 and March 2019, illustrating the positive influence of support from Natural Course.



25 YEP goals

This activity principally contributes to the goal of 'Clean & plentiful water', as well as contributing towards: 'A reduced risk of harm from environmental hazards such as flooding and drought', 'Enhanced beauty, heritage and engagement with the natural environment' and 'Mitigating and adapting to climate change'. Catchment management plans consider multiple benefit approaches to managing the health and sustainability of water resources.

Challenges faced & solutions

The primary aim of Natural Course is also its biggest challenge, collaborative working. By design, partners to Natural Course are diverse, representing central government bodies, local government, private utility company and third sector organisations. Getting five very different organisations working truly collaboratively has been challenging. Designing future phases in a ground up, collaborative way has been key to making significant progress.

A key challenge to the CaBA partnership support has been, and remains, the sustainability of funding for the CaBA partnership hosting role, which is currently provided by government on a year-to-year basis. Natural Course support has enabled some significant developments of CaBA catchment hosting in the North West and has shown that increased catchment hosting resources can contribute to mobilising funding for future projects. With a longer-term commitment to host funding, this success story can continue.



For more information please visit the Natural Course website: <https://naturalcourse.co.uk/>

Case study kindly provided by Tim Pitt, Integrated Water Project Manager at the Rivers Trust.

Water companies

Remit

Water companies have a statutory duty to supply clean and wholesome water to customers, alongside drainage and sewerage services. Ofwat has a duty in the way they regulate the water industry to “contribute to the achievement of sustainable development”¹⁸⁸.

Ofwat undertakes a Price Review every five years which requires water companies to submit business plans for approval. The plans must reflect the government’s strategic priorities and the requirements of the Water Industry National Environment Programme¹⁸⁹.

Water companies also produce Water Resource Management Plans, which Defra is consulting on strengthening. These have increased focus on resource management, alongside other drivers including the decarbonisation agenda and the Water Framework Directive.

Recently a requirement for Drainage and Wastewater Management Planning has also been introduced. This requires water companies to create a long term plan in collaboration with other organisations who have responsibilities in drainage, flood prevention and environmental delivery including reduced pollution from combined sewer outfalls and multiple benefits associated with more sustainable drainage systems. Water and sewerage companies will need to use the Water UK framework to produce their first Drainage and Wastewater Plan by the end of 2022 to support the business plans for the next Price Review¹⁹⁰.

Geography

There are 10 main water and sewerage companies¹⁹¹ in England and Wales providing services to most of the population, though there are many smaller companies and customers with private water supplies and septic tanks.

Structure

Whilst each company produces independent business plans, increasingly water companies are working together and with other sectors on a regional basis and Ofwat is to be granted additional powers to require this. There are now several regional groupings of water companies which have been established to consider longer-term and more regionally coordinated planning. For example, Water Resources East¹⁹² (WRE) is a not-for-profit independent company that brings together a range of partners to work towards a long-term sustainable water resources strategy for the East of England.

Water companies also work with CaBA partnerships, CSF, the Environment Agency and local authorities. Often water companies employ an individual to coordinate their involvement across the catchment. However, the approach to partnership working varies between water companies.

Delivery

Water companies have increasingly been required to consider the environment in their business plans. They are now also strongly encouraged to consider natural capital accounting in their business planning¹⁹³. Some have taken this further, for example Thames Water have included a commitment to report annually to Ofwat on their net gain progress. Others, such as United Utilities' SCaMP project, have worked to implement upper catchment environmental enhancement schemes as cost-effective alternatives to constructing treatment works to address water quality challenges.

Engagement with external environmental initiatives is another way that water companies provide environmental benefit. This engagement can be driven by regulation, economics or community requests for voluntary involvement.

An example of action driven by commercial need is water companies working with farmers through CSF to reduce diffuse pollution which lowers water treatment costs because abstracted raw water is then of a better quality. Water company representatives are actively engaged in CaBA, with a number of water companies hosting CaBA partnerships, and contributing to CaBA working groups such as the Agricultural sub-group.

Funding

Water companies are privately owned and run. Their work is funded by their customers and regulated by Ofwat in order to balance the provision of secure and resilient water and wastewater services with meeting the water needs of the environment and ensuring affordability for the customer.

Delivering against the 25 Year Environment Plan

Water companies are increasingly being required to deliver environmental outcomes. Their relationships with appropriate partners are already reasonably well established, providing a good foundation for future delivery.

This should be expanded to facilitate greater geographic reach of projects that can help meet the goals of clean and plentiful water, reduced hazard risk, and more sustainable use of natural resources. The advent of regional water resources planning and drainage and wastewater management plans mean that water companies will be even better placed to deliver environmental outcomes as part of their work.

The 25 YEP highlights that water companies could work with local authorities to “manage flood risk and adoption and maintenance of SuDS”¹⁹⁴. Water companies with land holdings could also directly contribute to increasing access to green spaces, where it is safe to open their land to the public.

A factor which limits planning for environmental delivery is the misalignment of timing for producing business plans and water resource management plans, and river basin planning.

Regional Flood and Coastal Committees

Remit

Regional Flood and Coastal Committees carry out much of the work previously done by regional flood defence committees, but also have coastal erosion within their remit¹⁹⁵.

12 Regional Flood and Coastal Committees across England were established by the Environment Agency under the 2010 Flood and Water Management Act. The main purposes of the Committees are to:

- Make sure there are adequate plans for flood and coastal risks across catchments
- Promote investment that optimises value for money and provides community benefit, and
- To act as the link between the Environment Agency, Lead Local Flood Authorities and other relevant stakeholders to facilitate knowledge exchange¹⁹⁶.

Structure

The governance of RFCCs is guided by the Regional Flood and Coastal Committees (England and Wales) Regulations 2011.

RFCCs have an independent Chair appointed by the Secretary of State¹⁹⁷. The majority of RFCC members are appointed by Lead Local Flood Authorities. This provides some democratic accountability and ensures members are people with relevant local knowledge and experience. The remaining RFCC members are appointed by the Environment Agency, including at least one member with environmental expertise and one with coastal expertise.

Geography

There are 12 RFCCs covering England and parts of Wales, as shown in Appendix one.

Delivery

There is no centralised delivery reporting on the work of RFCCs making it difficult to assess their overall effectiveness. However individual Committees do publish information on their activities and a list of RFCC contacts and websites can be found online¹⁹⁸. For example, the Thames RFCC published a periodic report covering 2011-17¹⁹⁹ and have also published information on natural flood management to share their learning²⁰⁰. RFCCs have open access meetings which the press and public can attend²⁰¹.

RFCCs work to a six-year programme of works. They advise on and give consent to the annual programme of Flood and Coastal Erosion Risk Management (FCERM) work in their region and approve the local levy that funds FCERM activities that are a priority within the region. In doing so they hold the Risk Management Authorities, such as the Environment Agency, to account on behalf of those they represent.

It would assist transparency if RFCCs reported jointly on their activity including plan making, collaboration and delivery. This would also help raise awareness of RFCCs and their role in linking relevant stakeholders involved in flood and coastal erosion risk management.

Funding

RFCCs are responsible for approving local levy rates which raise money for flood works. This funding is important as it helps pay for local projects that would not otherwise be funded under the Flood Defence Grant in Aid (FDGiA) because they do not meet conditions set out in the handbook for economic appraisal²⁰². In 2017/18 the Environment Agency local levy funding raised was £29.3 million²⁰³.

Most individuals who put time in to running RFCCs do so on a voluntary basis or as part of their day to day role within a separate organisation. The Chair of each RFCC receives remuneration which is funded by the Environment Agency²⁰⁴.

Delivering against the 25 Year Environment Plan

Reducing risk from natural hazards, including flooding, in an objective of the 25 YEP. There is a specific target to improve how those involved in flood management work together to manage the risk.

Due to the structure of their committees and involvement in flood risk management planning, RFCCs would be well placed to continue contributing towards meeting the target of improving joint working. Bringing together stakeholders and ensuring knowledge is shared and used to create adequate plans is a valuable role that RFCCs already have experience in.

To be able to monitor their effectiveness, RFCC reporting requirements should be reviewed.

Some RFCCs are also active in exploring and expanding the use of Natural Flood Management techniques, another 25 YEP target.

Internal Drainage Boards

Remit and structure

Internal Drainage Boards (IDBs) are public bodies, defined as Risk Management Authorities under the Flood and Water Management Act 2010. They work alongside the Environment Agency, LLFAs, water companies and in and through catchment partnerships, managing water levels within internal drainage districts to reduce flood risk and ensure water availability for agriculture and the environment.

IDBs are run by their boards, which consist of ratepayers, who may serve for periods of up to three years, and people appointed by levy paying authorities.

Geography

Internal Drainage Districts (IDD) are areas where drainage needs higher than normal degrees of management; lowland fens or levels and slow flowing river catchments. The boundaries for IDBs are generally set by local hydrology. For IDB locations, see Appendix one.

There 112 IDBs across England covering 9.7% of England's landmass²⁰⁵.

Delivery

The powers and responsibilities of IDBs are contained within the Land Drainage Act 1991, as amended. IDBs use permissive powers to ensure drainage channels are kept clear, protect and enhance the environment (particularly protected sites such as SSSIs), and most but not all operate pumps to transfer water. Whilst not statutory consultees IDBs are also actively involved in the planning process to help ensure development does not increase flood risk. IDBs perform both daily management and emergency response management in flood situations.

IDBs normally manage smaller water courses, with management of main rivers falling to the Environment Agency. They can however undertake work on behalf of the EA and local authorities and vice versa, by agreement under clauses in the Flood and Water Management Act of 2010. This is normally in the form of Public Sector Cooperation agreements (PSCAs).

The work done by IDBs helps reduce flood risk to nearly 900,000 properties in England²⁰⁶, as well as infrastructure. Work has also benefitted biodiversity, such as barn owls, otters, water voles and other protected species and many IDBs have SSSIs, SACs, RAMSAR sites or County Wildlife Sites in their areas. Each IDB has a Biodiversity Action Plan to help ensure the impacts of their work are limited and benefits are provided. They often play an active role in local conservation projects, for example the 3,700Ha Great Fen Project in Cambridgeshire.

Funding

Over £60million is required annually for IDB work²⁰⁷. This funding is mainly met by beneficiaries. Agricultural businesses pay a drainage rate, local authorities pay levies and the Environment Agency provides funding in the form of highland water contributions. Funding is also gained through Grant in Aid, FRCC local levies, from local developers in return for management of sustainable drainage systems, and from other partners.

To respond to flood situations that impose additional costs compared to routine management, IDBs need long term secure funding.

Delivering against the 25 Year Environment Plan

IDBs already play an important part in mitigating flood risks and protecting biodiversity. IDBs could be involved in the expanding delivery of Natural Flood Management and in ensuring their area have thriving plants and wildlife. As such they are an important partner in integrated delivery in parts of the country where they operate.

Business

Businesses working with supply chains can have a big impact on what and how goods are produced and valued and how their customers behave. In doing so they exert influence over the way our natural resources are managed. This influence can be local right through to international, depending on the product and demand.

Influence can also be positive or negative depending on product specifications and principles adhered to during procurement. For example a focus on price alone may drive intensive practices that degrade natural capital stocks, resulting in external costs that the artificially cheap price of the product does not reflect. Whereas focus on sustainability could improve natural capital stocks and welfare standards but the product is likely to be marketed at a higher price.

There is growing awareness of resource pressures and value. Reflecting this, industry standards have been developed. For example, Soil Association standards and the Forest Stewardship Council certification. These standards are voluntary, driven by understanding of and desire to achieve best practice rather than by regulation. Certification against voluntary standards can also provide business advantage through their use in marketing.

It is important that existing regulations are enforced to provide a stable baseline for environmental standards across all producers and suppliers. Voluntary best practice approaches are additional and do not replace the need to comply with regulation.

Adoption of voluntary industry standards raises awareness of the importance of sustainable resource management within that business, as well as externally where they collaborate with others. There is more work to be done on improving awareness of existing standards and the process of becoming approved and on increasing participation.

In relation to water, covered by the 25 YEP, several important industry initiatives and standards have been developed. Initially World Wildlife Fund (WWF) led the way with their Corporate Water Stewardship²⁰⁸ work encouraging businesses to assess their water footprints, look at ways to improve them and then go further by leading collective river basin action and influencing governance. Support is now developing for the Alliance for Water Stewardship's (AWS) International Standard²⁰⁹.

Alliance for Water Stewardship International Standard

The AWS International Standard builds on WWF's Corporate Water Stewardship work, Business In The Community's steps to securing water resources for future prosperity²¹⁰, the eco system approach principles²¹¹ and integrated water resources management²¹².

Alliance for Water Stewardship International Standard summary

- Version 2.0 introduced March 2019
- Three levels of Standard: Core, Gold and Platinum.
- The Standard aims to drive social, environmental and economic benefits at the scale of a catchment.
- Best practice encouraged for 5 outcomes: good water governance, sustainable water balance, good water quality status, important water-related areas, and safe water, sanitation and hygiene for all.
- 5 step framework for achieving the standard: gather and understand, commit and plan, implement, evaluate, communicate and disclose.
- Assurance system supports use of the AWS logo by those who have achieved the Standard.

At the last report in October 2018, AWS had 117 members and 25 certified sites in 12 countries²¹³. Engagement was best across food and drink supply chains but interest from textiles and microelectronics industries was growing²¹⁴.

Catchment Management Declaration

In May 2018 the catchment management declaration²¹⁵, produced in partnership and hosted by the Cambridge Institute for Sustainability Leadership, was launched in England. It invited businesses, civil society and the public sector to commit to the 25 YEP ambitions and support collective activities for successful catchment management.

Catchment management declaration principles summary

1. Taking responsibility to progress sustainable water management
2. Working collaboratively
3. Supporting improvement of existing governance frameworks
4. Increasing citizen awareness of their role in delivering water stewardship and encouraging positive action
5. Sharing best practice
6. Integrating delivery against the declaration into business operations.

A thought leadership group was developed to explore ways to enable business to address the principles and align with the 25 YEP. The group is also looking at number of longer-term ambitions including the potential for minimum, locally appropriate water stewardship standards.

The catchment declaration currently has over 100 signatories. There has not yet been a review of what the declaration has achieved in terms of signatory actions.

Courtauld Commitment

Generally industry standards and schemes are funded by those involved, however the Courtauld Commitment²¹⁶ provides an example of an initiative which was co-financed by UK governments.

The Courtauld Commitment, delivered by the Waste and Resources Action Programme (WRAP), was a voluntary agreement to improve resource efficiency and reduce waste which companies within the grocery sector can sign up to.

Launched in 2005, the Courtauld Commitment achieved outcomes of saving one 1.2 million tonnes of packaging in phase one, 1.7 million tonnes saving of waste in phase two²¹⁷ and a 7% reduction in CO₂e of packaging by 2015 relative to the 2012 baseline²¹⁸.

Courtauld 2025 was launched in 2016²¹⁹ and there are now over 156 business signatories and engagement partners²²⁰. Under the Courtauld Commitment 2025 agreement, signatories are working towards cutting "the amount of resource needed to provide our food and drink by one-fifth in 10 years"²²¹. Within this there are three targeted outcomes:

- "20% reduction in food and drink waste arisings in the UK
- 20% reduction in the GHG intensity of food and drink consumed in the UK
- A reduction in impact associated with water use in the supply chain"²²².

To reduce water use business signatories are monitoring and improving water efficiency in their own operations, business signatories are also participating in collective action to improve water quality and availability in key sourcing areas²²³.

Delivering against the 25 Year Environment Plan

With environmental delivery against the 25 Year Environment Programme ultimately being driven by land management practices, businesses have a key role to play in ensuring that the influence they exert supports sustainable management and 25 YEP delivery rather than hinders it.

Even where businesses are not involved in directly relevant supply chains they can play an important role through investing in environmental schemes as part of their Corporate Social Responsibility programmes.

The three existing schemes covered help support delivery against clean and plentiful water, using resources from nature more sustainably and efficiently and minimising waste. Growing these initiatives, and others, would improve delivery against the 25 Year Environment Plan and other national priorities, such as those raised in the industrial strategy.

Summary

The table below summarises current delivery against overarching 25 YEP goals.

| Body | Current delivery |
|-------------------------------------|---|
| Clean air | |
| CSF | Remit expanded 2018 to include reducing ammonia emissions and improving air quality. |
| Local authorities | Duty to create clean air plans. |
| Clean and plentiful water | |
| Environment Agency | Works with partners to improve water quality. Implementing the abstraction plan to improve water availability. |
| Rural Payments Agency | Enforces cross compliance rules, some of which protect water from diffuse pollution, as part of delivering the Basic Payment Scheme. |
| Natural England | Work in partnership to deliver water quality benefits, for example through CSF. |
| Local authorities | Some local authorities have been involved in projects to improve local water quality. |
| CaBA | Runs a range of projects addressing rural and urban water quality and flows. |
| CSF | Protecting water against diffuse pollution from agriculture is a long-standing aim. |
| Water companies | Increasingly engaging with farmers to reduce diffuse pollution both directly and through partnering with other initiatives such as CSF. |
| Businesses | Through schemes such as the Alliance for Water Stewardship International Standard, look to reduce their water footprint and contribute to improved integrated water resources management more widely. |
| Thriving plants and wildlife | |
| Environment Agency | Supporting habitat expansion. |
| Rural Payments Agency | Runs the Countryside Stewardship scheme, which supports environmental delivery. |
| Natural England | Enforce laws protecting wildlife and the natural environment. |

| | |
|---|--|
| | <p>Is responsible for designating areas for environmental protection.</p> <p>Is working towards its conservation strategy.</p> |
| Local authorities | Some local planning authorities are requiring biodiversity net gain for developments, an approach that is set to become a legal requirement through the Environment Bill. |
| CaBA | Supporting riparian habitat creation and restoration. |
| IDBs | Have management plans in place to protect biodiversity. |
| LNPs | Promote biodiversity offsetting and in doing so support the creation of suitable habitats. |
| National Park Authorities | Manage large areas of land to support biodiversity. |
| A reduced risk of harm from environmental hazards such as flooding and drought | |
| Environment Agency | <p>Delivers flood risk management schemes.</p> <p>Has published research on natural flood management.</p> |
| Forestry Commission | <p>Prepares to respond to hazards such as wildfires through training exercises.</p> <p>Has worked on natural flood management projects with the Environment Agency.</p> |
| CaBA | Supports NFM and abstraction reform. |
| CSF | Supports natural flood management. |
| Local authorities | County councils and unitary authorities are the Lead Local Flood Authorities for their areas. |
| Lead Local Flood Authorities | Manage local flood risks from surface water, smaller watercourses and groundwater. |
| Water companies | <p>Assist local authorities with flood management plans.</p> <p>Plan to mitigate the impacts of prolonged dry weather and drought.</p> |
| RFCCs | Facilitate links between flood stakeholders and ensures flood plans are adequate. |
| IDBs | Actively manage water levels to prevent flooding and to conserve water where practical to do so during drought. They prepare and update Water Level Management Plans for SSSIs in their areas. |

| Using resources from nature more sustainably and efficiently | |
|--|--|
| CaBA | Supports farmers to improve resource efficiency (fertilisers, pesticides and soil protection) as well as using water wisely. |
| CSF | Support farmers to look after their soils and make efficient input applications. |
| Water companies | Support customers to use less water. |
| Business | Initiatives such as the Courtauld Commitment are reducing waste and improving resource efficiency. |
| Enhanced beauty, heritage and engagement with the natural environment | |
| Natural England | Promotes public access as part of its general purpose under the 2006 Natural Environment and Rural Communities Act. |
| Forestry Commission | Has supported education on forests. |
| Local authorities | Manage local green spaces for residents to use for recreation. |
| LNPs | Promote nature access. Also engage with health professionals on the value of the natural environment. |
| CaBA | Community involvement in projects, including citizen science initiatives, supports engagement with the natural environment. |
| Local Authorities | Support maintenance of local green spaces. |
| Water companies | Some companies have allowed public access to their land. |
| National Park Authorities | Provide tourism opportunities which encourage engagement with the natural environment. Engage young people through running school visits. |
| Mitigating and adapting to climate change | |
| Forestry Commission | Planting trees to work toward government targets as well as supported expansion through grants and advice. |
| CaBA | Some CaBA projects look to adapt to climate impacts (e.g. shading rivers). |
| LEPs | Exploring opportunities for developing financial and non-financial incentives on renewable energy projects is part of their remit. |

3. Barriers between current and future delivery

The 25 Year Environment Plan (25YEP) sets out a new vision and a range of targets to achieve the government's ambition to leave the environment in a better state for future generations. However, whilst the plan is new, and policies are being developed to deliver its goals, the mechanisms for delivery are pre-existing and have not received policy attention.

It is essential to review and strengthen approaches to achieve the turnaround in environmental decline which is necessary to address the current biological and climate crises and achieve the government's ambition.

Our review has identified six common barriers to delivery that organisations are facing. These are:

- Non-alignment of delivery body objectives with the 25 YEP goals
- Lack of strategic oversight and coordination
- Funding constraints
- Lack of accountability
- Human capacity constraints, and
- Misaligned boundaries.

Breaking down these barriers is essential to ensuring the success of the 25 YEP in delivering environmental benefits.

Delivery body objectives

Many of the statutory bodies reviewed were involved in the drafting of the 25 YEP and have updated their plans to reflect delivery against the goals.

However, current delivery against 25 YEP goals by non-government bodies appears largely coincidental, based on past policies and funding priorities, rather than intended to meet the plan. There is great potential for these organisations to deliver against 25 YEP goals either under their existing remits or through reasonable expansion where there is also an improved level of strategic oversight.

For 25 YEP goals to stand a better chance of implementation it is important that the objectives of each organisation are reviewed. If 25 YEP targets are included in organisational objectives it should raise awareness of them, encourage ownership of delivery and increase the chances of funding being obtained. It would provide a much stronger connection between central government strategic policy and on the ground delivery.

It may be more difficult to achieve delivery of national priorities where organisations have no statutory remit or delivery structure because voluntary groups cannot be required to meet

set objectives, only encouraged. However, encouragement can be provided through targeted funding opportunities and promoting partnership working with organisations whose objectives have been aligned with the 25 Year Environment Plan.

Strategic oversight and coordination

It is essential that government departments deliver the government's 25 Year Environment Plan using a cross departmental approach, which also addresses siloed thinking within departments. Outside of government, organisations are increasingly looking to collaborate to improve efficiency in delivering their overlapping ambitions. Examples of current collaboration include:

- CaBA is wholly collaborative
- CSF and water company work with farmers
- Local authority partnerships for delivering water quality improvements
- National Parks working with schools to encourage engagement with the natural environment.

There are examples of good collaboration and effective delivery within all organisations reviewed. However, systematic collaboration across whole systems is not currently widespread. Delivery, particularly by smaller bodies, is based on individual projects and so concentrated at a local level. The effectiveness of delivery also often depends on the drive, ambitions and strengths (or weaknesses) of the stakeholders and individuals voluntarily involved, so can vary considerably.

Whilst larger government bodies have many employed staff, collaborative efforts mean they too can be reliant, to a lesser extent, on volunteers.

Stakeholder engagement and diversity are key for informed planning and delivery that meets local needs as well as delivering national aims. It may be appropriate to set guidelines for diversity to ensure that a range of viewpoints are likely to be contributed to organisations.

Effective and coordinated collaboration can deliver several benefits which would improve delivery. These include improving collective ability through knowledge and skill sharing, innovation, integrated delivery against shared aims, more strategic planning, avoiding duplication of effort and avoiding competition for funding through shared projects or avoiding duplication of projects with similar outcomes due to greater awareness of others' plans.

A more systemic understanding of where the responsibilities, authority and influences lie and where there are delivery gaps would help bodies work towards more coherent management, which the 25 YEP advocates.

No single body can deliver all the changes needed to meet the 25 YEP goals making collaboration vital to its successful implementation. There are also several other hurdles that are limiting collaboration including: funding constraints, accountability, human capacity and administrative boundaries.

Part four of this report considers three approaches to increasing integration of delivery:

1. Allow the current trend of increasing collaboration and partnership to continue to **grow organically**
2. **Facilitate** collaboration at a larger scale through a **systems approach**, utilising existing organisations
3. **Extensively review and reform** the delivery framework to provide efficiencies

Funding

Uncertain and insufficient funding is a primary barrier to target delivery. This was noted as an issue for many of the organisations considered, particularly smaller bodies. Although certainty and quantum of funding are of great relevance, particularly for LNPs and local authorities, other funding issues noted in our review of the organisations related to reliability, security, timing, and conditions.

The funding of LEPs provides a good example of where funding has been forthcoming but unpredictably so. Instead of having fixed funding levels over an extended period, LEPs have had a succession of separate short-term funding commitments.

This means that long-term projects could not be planned as well as they might have and the complexities of meeting the different requirements for several funding sources had to be managed. This funding model is likely to result in inefficiency; it could be argued that the same total spend could have returned more benefit had it been evenly applied under a single funding commitment over the same period.

It can also mean that the administration and delivery is unbalanced. Meeting tender and reporting conditions for funds from multiple sources can be time consuming and direct attention away from practical delivery.

Timing and conditions attached to funding can also impact on project delivery. Where time limited funding is attached to individual projects it can drive work being undertaken at suboptimal times. For example, catchment partnerships having to undertake bank works in poor conditions in the winter when otherwise project managers would choose to wait until the ground was dryer, as has been experienced with the Water Environment Grant. This indicates a lack of consideration for the environment which many projects are trying to protect and enhance and is therefore counterproductive.

The timing of providing funding and the timeframe for spending it should reflect what is reasonable for the project being funded rather than being driven by financial or other reporting timetables. Funding long term plans, which can deliver greater benefits, could encourage more strategic delivery and avoid sub-optimal delivery timing.

Levels of regular funding must also be secure to provide the optimum benefit. In recent years CaBA partnerships have received £15,000 of funding each year to cover administrative costs of partnership hosts. However, this funding is allocated on an annual basis and the

decision on whether to continue funding is not made far enough in advance of the next funding period to provide partnerships with security.

Funding insecurity means that organisations, and potential delivery partners, do not have confidence in their long-term future, which impacts on how they can plan projects, the length of projects that can be undertaken and causes individuals involved in hosting the partnership financial stress. This can result in loss of knowledgeable managers as they leave to take up more secure posts. Again, this translates into inefficiencies in delivering measures on the ground.

The key issues within funding, for most delivery organisations, remain the certainty and amount. It should be acknowledged that all delivery organisations need a reasonable level of funding secured over a multiannual period to allow them to operate reliably, against a well-planned strategy. This would better enable long term planning and delivery, opening wider fundraising and partnership opportunities.

The 25 YEP has increased the level of ambition for delivery of environmental improvement significantly. It is effectively aiming to move from a baseline of gradual environmental decline over many decades to one where the environment is in a healthier state, when measured against a range of indicators and metrics. Changing this trajectory will demand more resource directed towards enhanced delivery, whatever the mechanism. We consider it unrealistic to expect the voluntary and charitable sector to deliver against much of this ambition without additional capacity.

Currently delivery initiatives are heavily dependent on external funding and in-kind contributions, often through volunteer time and expertise. Where projects have clear beneficiaries is it appropriate to look to them for a contribution towards funding and many initiatives and delivery organisations are already securing such funding. However, where projects provide public good it may be more appropriate for them to be funded by the government.

To assess what level of funding it might be appropriate for the government to commit to achieving the 25 YEP goals, government should adopt a natural capital approach. The Natural Capital Committee's sixth report²²⁴ states that environmental investments have been shown to deliver good benefit compared to other investments, so this would be a good way to provide reasonable return on the investment of public money.

For this approach to work all delivery organisations need to include natural capital benefits within their monitoring and delivery reporting. Increased use of natural capital approaches would also play a role in increasing private sources of funding, as it should help beneficiaries see the advantage they obtain from investing in partnerships. Organisations should be supported in developing their understanding and use of natural capital approaches, particularly natural capital accounting.

Securing additional, regular, reliable government funding confirmed over multiple years would allow delivery organisations to invest more in human resources which can provide a good return through:

- expanding fundraising income to improve the ratio of government to external funding,
- developing more strategic long-term delivery plans, and
- improving collaboration with other initiatives.

Accountability

We found lack of reporting to be a barrier in assessing funding and delivery for some, particularly smaller, organisations. This was an issue at different levels for different bodies. Some were good at national reporting but not local and vice versa, few delivered well at both levels.

Lack of reporting could indicate absence of adequate reporting requirements. Alternatively, those involved in delivery and reporting may be lacking data collection and analysis skills, or confidence, or simply the time and resource needed for effective reporting.

Inadequate reporting acts a barrier to delivery in several ways, including:

- limiting organisations' ability to identify opportunities for collaboration
- limiting organisations' ability to review and improve the way they work and their results
- limiting visibility of achievements making it difficult to justify central government funding requests, and
- reducing accountability, as it is more difficult for regulators spot whether organisations are meeting their duties. This limits ability to take enforcement action, where appropriate and possible, and ability to identify needs for and provide extra support.

If all organisations and bodies reported against agreed 25 YEP metrics it would allow better identification of opportunities for collaboration and comparison of delivery.

Lack of adequate reporting should be further researched and addressed, through formal requirements, where appropriate.

Capacity building

As identified above, for a transition to funding based on natural capital values to work, delivery organisations need to be supported in developing their understanding and use of natural capital approaches, particularly natural capital accounting.

Other areas where knowledge and skills may also need development include natural flood management, data collection and use, and integrated pest management. Expansion in these areas, and other necessary areas, should be facilitated by knowledge exchange.

Particularly regarding CaBA, we found that loss of skills to other organisations is an issue. This often happens because knowledgeable coordinators and advisors move to organisations that can offer greater financial security. This loss of knowledge must be

addressed through reviewing funding structures and ensuring the availability of adequate training to upskill new applicants and to support existing coordinators. This would provide value to individuals through professional development as well as improve organisational delivery for public benefit.

We also found that where organisations had limited resource to employ staff the expectations placed on those employed could be unreasonable, causing stress to the individual. Low human capacity limits the amount that can be planned, funded and delivered, despite groups good intentions and ambitions. Resolution of this issue links back to funding requirements. Funding should be adequate to meet the delivery ambition. The 25 YEP has increased ambition, but full delivery cannot be realised without a corresponding increase in funding.

To achieve the best delivery against both national and local priorities, stakeholder diversity is beneficial. Many organisations are not required to consider stakeholder diversity and as a result some partnerships lack a good range of perspectives. It may be appropriate to provide guidelines on how to achieve better levels of inclusion and the benefits this can provide.

Administrative boundaries

Alongside lack of resource, another major barrier to delivery through collaboration is lack of coordination in terms of planning timetables, but perhaps more significantly also misalignment of geographic boundaries.

The framework for delivering against local and national objectives has evolved organically over time. As organisations have been set up to address a wide range of issues, they have established boundaries to suit delivery within their remit. Whilst this made sense for delivering against specific objectives it has created a complex delivery landscape where initiatives overlap with each other rather than complement each other within a geographic area.

Current boundaries do not naturally facilitate collaboration to meet national strategic aims. There have been efforts to consolidate boundaries, for example in the functions of the Environment Agency, Natural England and the Forestry Commission. However, there is limited scope to consolidate further given that these boundaries remain appropriate for individual bodies remits and objectives. We therefore need to improve cross boundary working.

We consider that it is appropriate to encourage organisations to cooperate across different boundaries. Some organisations already have a Duty to Cooperate established in statute for various purposes. The need for new duties could be considered in the context of delivering environmental recovery.

Summary

To support delivery of the 25 YEP goals it is important that organisations operate in good conditions.

We have discussed and suggested ways to address the main barriers that are currently being faced, as summarised by the table below.

| Barrier | Suggested solution |
|---|--|
| Non-alignment of delivery body objectives with the 25 YEP goals | Review organisations' objectives and align them with 25 YEP goals. This should raise awareness of the goals, justify action against them and allow bodies to bid for funding to deliver against them. |
| Lack of strategic oversight and coordination | See section 4. It may be useful to introduce a light framework for better coordination. Reporting is necessary for oversight. |
| Funding constraints | Review the amount and security of organisations' funding against delivery expectations. |
| Lack of accountability | Introduce formal reporting requirements where necessary. Organisations' reports should cover the same information to make them easily comparable and support provision of oversight. |
| Human capacity constraints | Address through appropriate funding and training provision. |
| Misaligned boundaries. | See section 4. There may be limited opportunity to align organisations boundaries. Instead ways of supporting cross boundary working should be explored. |

Further consideration of how these barriers can be reduced will be important if the ambitions of the 25 YEP are to be met efficiently.

In the next section we consider in more detail how oversight and coordination could be improved.

4. Strategic oversight and coordination

The delivery landscape is crowded. In this report we have examined a limited number of the many organisations involved in delivering the 25 Year Environment Plan (25 YEP) goals.

In analysing current delivery we found that individual organisations are well acquainted with their objectives and are already delivering to a certain extent against 25 YEP targets, even though non-statutory objectives have not yet been reviewed to take these targets into account.

Organisations address their objectives over defined geographic areas which often overlap but do not match (see Appendix one). Each boundary has been chosen to reflect the purposes of the body. However partnership working across boundaries can be more difficult than within the same boundary.

To achieve the 25 YEP goals in the most efficient way, organisations need to collaborate and pool resources to achieve 'more for less'.

We see three broad approaches to integrating delivery:

1. Allow the current trend of increasing collaboration and partnership to continue to **grow organically**
2. **Facilitate** collaboration at a larger scale through a **systems approach**, utilising existing organisations
3. **Extensively review and reform** the delivery framework to provide efficiencies

Growing collaboration organically

Under the current approach to partnership working we can see that benefit is being delivered, increasingly through joint projects. This localised approach to delivery has built up social capital, giving delivery organisations access to important local information on the environment that is otherwise unrecorded and unavailable. This is invaluable in shaping their approach to delivery, allowing focus on changes that are most likely to provide meaningful improvements.

However we must also acknowledge the plethora of evidence that highlights serious failure in environmental delivery:

- The National Biodiversity Network's latest State of Nature report (2019) shows that biodiversity declines continue unabated, with a 13% decline in average species abundance since 1970²²⁵.

Biodiversity continues to decline to the extent that the Food and Agriculture Organisation of the United Nations has warned in its international report, *The state of The World's Biodiversity for Food and Agriculture*²²⁶, that declines in biodiversity are threatening food supply. Biodiversity decline has also been recognised by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) *Global Assessment*²²⁷.

Declining biodiversity leaves delivery lacking against 25 YEP target 3, thriving plants and wildlife.

- The Committee on Climate Change's tenth statutory progress (2018) report to parliament states that "progress in the power sector masks a marked failure to decarbonise other sectors" and "the UK is not on course to meet the legally binding fourth and fifth carbon budgets"²²⁸. This will make the challenge of meeting 25 YEP target 7, mitigating and adapting to climate change, more difficult.
- In 2018 the House of Commons Library briefing paper on Water Quality showed that despite a Water Framework Directive requirement for all water bodies to have achieved "good" status by 2015, "in 2016, 35% of surface waters across the UK were classified as 'good' or better"²²⁹. This had improved by 2018 with the Defra Secretary of State confirming "that "around one quarter" of water bodies in England will not meet 'good' status and have been set lower objectives"²³⁰. An achievement that lags far behind the ambition.

Water quality failure impacts on 25 YEP goals 2, clean and plentiful water, and 3, thriving plants and wildlife. Within this it directly impacts the target to improve "at least three quarters of our waters to be close to their natural state as soon as is practicable"²³¹, notably a lower target than the initial Water Framework Directive requirement.

- The UK National Ecosystem Assessment²³², published 2011, highlighted decline over 30% of ecosystem services and reported consistent undervaluation of the value of nature's contribution to our wellbeing and economy. The valuation of nature is being addressed through natural capital accounting, but this approach is not widespread.

Taken together such reports clearly show that the current approach is not achieving at the levels needed to improve our environment. This of course underlines the importance of the 25 YEP, but it must be delivered, and this will require change.

Facilitating collaboration through a systems approach

A systems approach looks to coordinate the actions of a wide range of stakeholders to address complex environmental issues. This approach works at a regional scale over the long term through several stakeholders addressing the causes of issues in a coherent way that considers the consequences of those actions. The approach is reliant on integration, described by Smith *et al.* as "an approach that is comprehensive and spans the boundaries of self-interest, sector, discipline and governance"²³³.

Current delivery does not take a systems approach in that it is often focused on short term, stand-alone local projects, with some looking to address the symptoms of the issues rather than the systemic cause(s).

The 25 YEP recognises the need to take a broader view of the environmental issues we face and collaboratively address their root causes through a systems approach,

*A key concept underpinning a natural capital approach is system based thinking which recognises the interdependencies between the different elements of the natural capital framework and any emergent properties which occur through these interactions.*²³⁴

Case Study: Greater Manchester Urban Pioneer



Four three-year Pioneers were set up by Defra to support the development of the government's approach to the 25 Year Environment Plan. Specifically the pioneers were asked to test new tools and methods for applying a natural capital approach, demonstrate an integrated approach to delivery, pioneer and scale up new funding opportunities, and grow and share an understanding of what works²³⁷.

The pioneers are exploring different geographic contexts: landscape, catchment, urban and marine. The current Greater Manchester Urban Pioneer provides a strong example of many existing organisations working in partnership within the Greater Manchester Combined Authority area.

The vision for the project is,

To make a clear and evident contribution to Greater Manchester's natural environment, engaging and connecting people with nature, maximising their health and economic benefits through investment in the environment, creating sustainable growth and a good quality of life²³⁸.

The Greater Manchester governance structure is complex, but the bodies feeding into the Natural Capital Group are: Greater Manchester Local Enterprise Partnership, the Greater Manchester Combined Authority, Greater Manchester Low Carbon Hub, Defra, the Environment Agency, Forestry England and Natural England²³⁹.

The group is working towards five objectives: develop the evidence base; demonstrate a place-based approach; create a Natural Capital Investment Plan; identify a demonstrator project; and develop and test a communications and engagement mode²⁴⁰.

The Greater Manchester natural capital account has been developed and published. The report assessed the total benefits of natural capital in the area to be £1billion, with the asset value being £28billion²⁴¹. A Greater Manchester Natural Capital Investment Plan was also published earlier this year²⁴². These documents serve to demonstrate the success of the collaborative approach taken.

Currently delivery broadly runs on two models: top down implementation, through government schemes, regulation and enforcement, and bottom up implementation, through the non-statutory bodies and organisations examined in this report which decide at a local level how to deliver against their objectives. This often leaves a regional delivery gap between these two approaches which deliver at a national and local level.

Work as part of the Natural Course project²⁴³ highlighted this gap and proposed that it could be addressed by moving from a position-based governance model to interest-based governance. This would allow management based on stakeholder's needs and delivery priorities rather than on a permission providing basis.

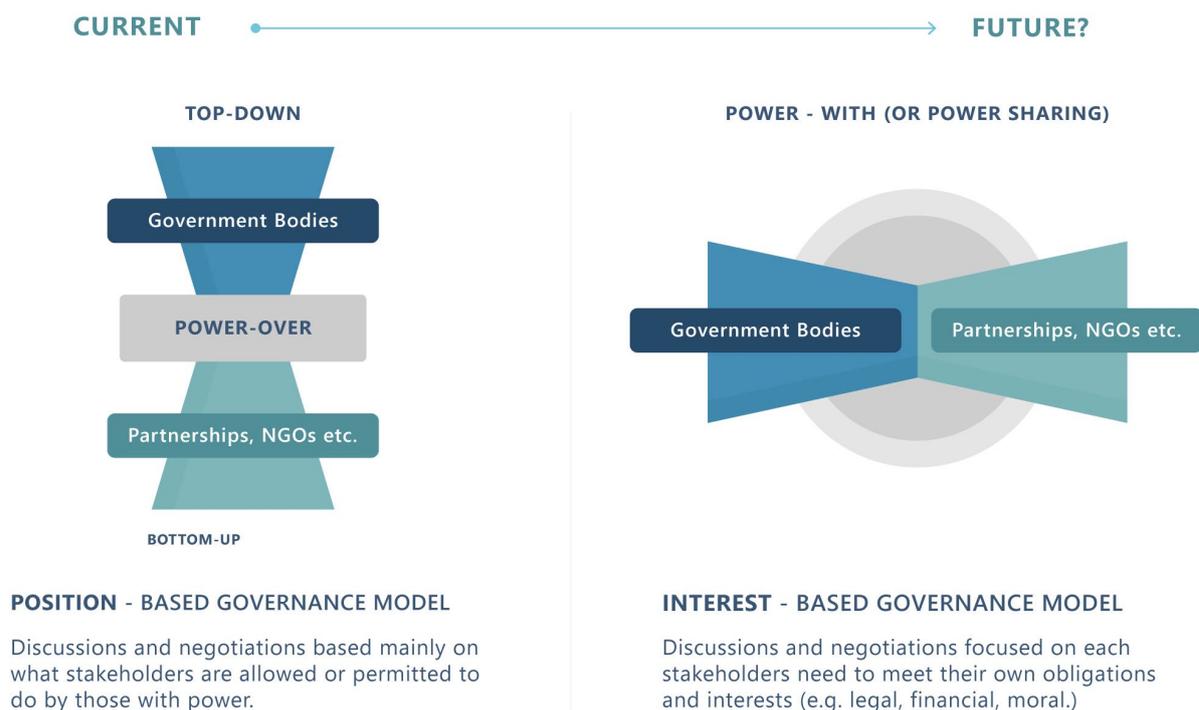


Figure three: Position based governance, adapted from The Open University²⁴⁴

To allow interest-based governance to work efficiently a number of structures have been proposed, around key roles, including:

- A **bridging agent model**- where horizontal coordination of stakeholder delivery at local, regional and national levels and vertical coordination of delivery at these different scales is facilitated by a bridging agent. Independent bridging agents do this through creating knowledge flows, supported by the ability to access a regulator who can enforce such co-ordination where the bridging agent feels delivery against their advice is lacking.
- A **system operator model**- where an overarching system operator can drive delivery against the 25 YEP through allocating funds on a reverse auction basis.
- A **system coordinator** model- where a system coordinator takes on the role of a system operator as well as responsibility for aligning policies, objectives, planning and delivery across organisations and government departments.

- A **poly-centric governance** model- where multiple governing bodies work together to make and enforce policies, considered a good way to achieve collective action during unsettled times²⁴⁵.

Several framework models have been suggested by professionals working in the field, including the three below.

1. Regional Boundaries are modelled on environmental factors, for example water catchments.

Collaboration is professionally facilitated through meetings and discussion forums where delivery organisations are represented.

Through meeting, knowledge and best practice examples are exchanged and a collective vision and priorities for delivery are developed.

Funding is allocated by a regional coordinator in line with this vision to support its delivery.

The regional coordinator, who could be considered a bridging agent, is also responsible for reporting to the Office for Environmental Protection on progress.



2. Regional boundaries are modelled on environmental factors, for example water catchments.

Within each region there are up to four delivery groups: urban, rural, flood, and coastal. These could encapsulate the existing delivery organisations or act as framework for rationalisation.

The Chair of each body represents it on a regional committee whose chair is appointed by the Secretary of State for Defra. The committee allocates money to the delivery groups based on the goals of the 25 YEP. The committee is responsible for reporting progress to the Office for Environmental Protection.



3. Regional boundaries follow administrative boundaries of local authorities.

Local authorities are responsible for working with delivery organisations to develop a local delivery plan based on natural capital and delivering the 25 YEP. Working at this level, alongside local development planning, could encourage a more holistic approach to land use planning.

A Community Interest Company is set up to handle Treasury and local funds from tax and distribute this money for delivery in a transparent way.

The local authority is responsible for reporting on progress to the Office for Environmental Protection. Regulation could impose delivery responsibility on local authorities creating a route for enforcement of delivery.

This model also provides an element of local accountability as elected members contribute to local authorities.



Each of these suggested frameworks has strengths and weaknesses. The first two have a greater focus on bringing parties together to coordinate delivery but lack an enforcement mechanism with funding being the only route to encourage action. The third framework provides accountability, enforceability and transparency in public funding however it is not clear how partnership working will be facilitated.

The frameworks are based around different boundaries, the first two suggest water catchments, the last suggests a focus on population centres. Cross boundary working has previously been seen as a barrier to effective delivery. Focusing on environmental boundaries helps ensure that environmental concerns are met, whereas focusing on population boundaries helps ensure that social capital is adequately addressed as an element of natural capital.

Whichever regional boundaries are chosen there will still be overlapping and mismatching delivery body boundaries, as in most cases environmental and administrative boundaries do not align. Where those boundaries are assisting delivery it seems inappropriate to redraw them. It is important therefore that focus is shifted from boundary alignment towards supporting cross boundary working.

As delivery organisations remain fully or largely undisturbed in these framework proposals it will be important to ensure that they can function in their existing form. Every delivery body should have enough basic, secure funding to plan and operate long term, including to build and develop wider, more extensive funding streams. This core funding should be allocated by central government. Additional funding for projects should be allocated regionally in line with the collectively owned vision for environmental delivery.

Research on integration

Research has been carried out on integrating delivery across water catchments, producing some principles that can be applied more broadly to delivery against environmental goals.

The Organisation for Economic Co-operation and Development's (OECD) report *Principles on Water Governance*²⁴⁶ provides 12 principles for enhancing the effectiveness of governance, including to:

- "Manage water at the appropriate scale(s) within integrated basin governance systems to reflect local conditions, and foster co-ordination between different scales".

This supports our preference to maintain existing operational boundaries where they support delivery for their intended purposes. The OECD highlight that multi-level cooperation between users, stakeholders and government is important for fostering coordination.

- "Encourage policy coherence through effective cross co-ordination, especially between policies for water and the environment, health, energy, agriculture, industry, spatial planning and land use". Through co-ordination mechanisms, co-ordinated management, reporting and reviewing practices, and providing incentives and regulations. And "encourage water governance frameworks that help manage trade-offs across water users, rural and urban areas and generations".

This supports the view that a framework would assist delivery and that diversity of stakeholders is important for developing policy and delivering multiple benefits in the most efficient way.

- “Mainstream integrity and transparency practices across water policies, water institutions and water governance frameworks for greater accountability and trust in decision-making”. Through establishing clear accountability and control mechanisms and adopting multi-stakeholder approaches.

Accountability within many wider delivery bodies is not as strong as within government bodies and does not currently allow for enforcement of delivery against objectives. The only framework that adequately addresses accountability is the final framework which places overall delivery responsibility with local authorities and addresses funding transparency.

Work by Smith *et al.*²⁴⁷ also recognises the importance of trust, highlighting that:

- Those delivering a leadership and coordination role must have the trust of the authorities, and
- That boundaries can be overcome where there is trust, shared knowledge and understanding, and acceptance of stakeholders’ legitimacy

Their work also makes a strong case for the need to develop shared visions and strategies to support delivery, alongside legislative direction and administrative and technical support. Arguing that a shared vision allows planning and activities to be coordinated, provides legitimacy for actions and can help open opportunities for local delivery to receive central funding.

Local involvement in planning allows national aims to be balanced against local social and economic goals and, as stated above, provides the opportunity for stakeholder trade-offs and win-wins to be identified.

For a delivery framework to be considered a success it must:

- **Support structured dialogue between existing delivery organisations, other stakeholders and members of the public to**
 - **Support opportunities for learning and developing social capital, and**
 - **Facilitate development local and regional environmental visions and planning**
- **Engage potential financiers on developing innovative funding solutions**
- **Allocate central government funding in a transparent way that encourages collaboration rather than fuels competition**
- **Fulfil a reporting function and link to enforcement to provide accountability**

More research is needed to consider what frameworks could achieve delivery against these factors. This would need to include end users to ensure a useful and realistic model was developed and could be adopted in practice.

Extensive review and reform

There are a lot of existing organisations, which have not all been covered in this report. Each has taken time to establish itself, build support and progress delivery against its objectives.

As discussed, there are many areas where the organisations reviewed overlap. Under this approach existing delivery bodies and organisations could be reviewed and merged by interest within each delivery area. For example regionally flooding related responsibilities could be held by one body, as could water quality, etc.

This could provide efficiencies in the long term and with Brexit creating both uncertainty and opportunity it could be a good time to consider reviewing and reforming who delivers for the environment and the organisational structure.

However, there are also negative impacts that could result from restructuring.

Restructuring delivery organisations risks disengaging individuals who hold valuable knowledge. Non-statutory organisations are generally dependent on these individuals volunteering their time and knowledge. Damaging goodwill could result in a decline in planning and delivery and which would both take time to rebuild. To avoid disengagement of volunteers impacting on planning and delivery the government would need to fund additional capacity, which seems unlikely in the current economic climate.

The exercise of reforming existing delivery mechanisms would be time consuming and costly. The UK has poor track record for managing large scale changes in delivery which can be demonstrated by experiences of changes to Common Agricultural Policy schemes, the transition to universal credit and making tax digital.

Given the current state of environmental decline, highlighted by both climate and ecological crises, it could be argued that potentially lengthy delays in securing delivery actions would be unacceptable.

Summary

Having considered the three scenarios, we believe the most practical option for improving delivery against the 25 YEP targets would be to facilitate collaboration at a larger scale through a systems approach.

More research is needed to determine whether a formal framework should be implemented, what structure that should take and how flexible its application should be.

5. Conclusion and recommendations

We welcome the 25 Year Environment Plan (25 YEP) in raising the profile of environmental issues and the government's ambition to address them. Since the launch of the 25 YEP we have seen a great deal of planning activity to support future delivery through the introduction of more specific plans and policies. However, we perceive that there has been a lack of focus on supporting and strengthening existing delivery.

Through reviewing a range of government and non-government organisations we identified and summarised existing action towards the 25 YEP goals as well as some significant barriers affecting multiple bodies.

We noted good delivery focus around clean and plentiful water, thriving plants and wildlife, reducing harm from environmental hazards (specifically flooding), and enhancing access and engagement with the natural environment. However we also noticed that despite improvements in collaboration at project level there is a disconnect between organisations' planning and delivery despite having complementary objectives.

Common barriers to delivery we identified were:

- Non-alignment of delivery body objectives with the 25 YEP goals
- Lack of strategic oversight and coordination
- Funding constraints
- Lack of accountability
- Human capacity constraints, and
- Misaligned boundaries.

We suggested ways in which these barriers can be reduced in section 2. In line with these and our research on frameworks, we propose six recommendations which we call government to act on to support delivery of the 25 YEP goals.

1. Delivery organisations should be required to review their objectives and work towards 25 YEP goals. This requirement should be underpinned by a robust statutory duty for public bodies to consider and enhance the environment.

For the 25 YEP to be an effective overarching plan, organisations which will need to deliver against it should have properly aligned objectives. This should raise awareness amongst their staff and volunteers of the importance and relevance of the 25 YEP and provide legitimacy for groups to pursue targets in the 25 YEP and bid for funding on that basis.

This could be further leveraged by a stronger statutory duty on public bodies to consider and enhance the environment in their actions. The current duty to have regard to biodiversity, which was established by the Natural Environment and Rural Communities

(NERC) Act 2006, is ineffective because wording is weak and there is a lack of reporting requirements and enforcement.

2. Collaborative, partnership working should be facilitated through improved strategic planning and governance.

To reap the benefits of collaboration and ensure integrated delivery, collaboration between organisations should be encouraged at a range of scales to ensure the 25 YEP goals are met efficiently and cost-effectively.

A far more strategic approach is required to planning and delivery, taking a systems-based approach to planning and delivering environmental recovery and action at the landscape scale. Appropriate statutory bodies could have responsibility for taking on a governance role depending on the location and its particular characteristics, needs and associated public bodies.

More research is needed, alongside end users, on how to best facilitate systematic collaboration in a range of different contexts and on which delivery frameworks are likely to be most effective.

From our research we believe that for a delivery framework to be considered a success it must:

- Support structured dialogue between existing delivery organisations, other stakeholders and members of the public to
 - Support opportunities for learning and developing social capital which should in turn support health and wellbeing, and
 - Facilitate development local and regional environmental visions and planning
- Engage potential financiers on developing innovative funding solutions
- Allocate central government funding in a transparent way that encourages collaboration rather than fuels competition
- Fulfil a reporting function and link to enforcement to provide accountability.

3. Annual reporting should be required locally, regionally and nationally.

Organisations and their national support structures should be required to report annually on their finances, delivery and future delivery plans. This will provide transparency, allowing organisations to identify opportunities for collaboration and facilitating accountability.

Effective monitoring will be vital to the effectiveness of planning as it allows approaches to be reviewed and revised. The 25 YEP and proposals in the draft Environment (Principles and Governance) Bill linked to the new Office for Environmental Protection identify the need, and make provision, for improved monitoring of progress against indicators. This is welcome and should be enabled by clear requirements for data gathering and reporting in common formats so that organisations can effectively share data. Once established, the OEP should ensure that all appropriate bodies – both government and non-government – are able to report on their activities in a way which effectively informs understanding of progress and of strategic planning.

Public bodies could be required to report on their progress against any stronger statutory duty on public bodies to consider and enhance the environment in their actions that could be introduced through an amendment to the NERC Act.

4. Delivery organisations should be supported in developing skills needed to deliver the 25 YEP.

To enable effective delivery and meaningful reporting, organisations should be supported in developing necessary skills. These may include data collection and analysis and natural capital accounting.

Currently government and non-government organisations are faced with skills and capacity challenges. In cases where good practice is being delivered, this is too often because of the presence of committed and passionate champions within organisations rather than as a result of comprehensive training programmes. Lack of necessary skills, linked to funding shortage, is a challenge, particularly for local authorities and those in the charitable sector.

Improved support structures are necessary to enable bodies to develop the base of skilled employees and volunteers needed in order to achieve the best outcomes at the scale needed. Learning requirements will vary between delivery organisations and individuals, so approaches to improving skill should be flexible. As part of this knowledge exchange should be encouraged.

5. Government funding of organisations must be reviewed.

Scale

The Natural Capital Committee's latest report to the Economic Affairs Committee of the Cabinet stated in reference to 25 YEP funding that, "it is not enough to will the ends: the means have to be provided to achieve them"²⁴⁸. We fully support this statement. Realistically the achievement of the government's increased ambitions on the environment will need to see a corresponding reversal of the extensive funding cuts which have been felt particularly acutely in the environment sector.

In the past we have seen failure to meet Water Framework Directive targets and Air Quality Standards Regulation targets, declining wildlife and are also forecast difficulty in meeting the legally binding fourth and fifth carbon budgets. Austerity and a Treasury failure to invest adequately in the environment are failing both current and future generations and need urgent revision.

We ultimately rely on nature as the basis for providing all services. This value should be reflected in our decision making and environmental delivery prioritised. We call on Treasury to allocate adequate funding to allow bodies to meet their planning, fundraising, and administrative requirements. Adequate seed funding will allow broader financial contributions to be secured from wider beneficiaries of environmental improvement work.

Reasonable funding should be allocated to a range of delivery organisations. To date LEPs have received far more funding than organisations that have a greater environmental focus. Given the value of natural capital to the wider economy and the scale of the 25 Year Environment Plan's ambitions, equality of funding needs review. All valued groups should have enough basic funding to be able to function.

Security

Funding must not only be adequate in amount it must also be secure over a reasonable term. Currently funding is reviewed and reallocated, for some organisations, on an annual basis. This undermines their ability to undertake long term planning and projects which can deliver better value than those focused on short term improvements.

Lack of funding security also affects organisations structures because key individuals often leave to take up more secure positions. Funding to support the basic functions of organisations should be secured over a reasonable term to support delivery that provides best value for money – we strongly advocate for multi-year settlements.

6. Innovative funding routes should be developed.

Funding is currently the main barrier to delivery. To achieve the ambition of the 25 YEP there will need to be a mix of public and private funding. Public money should only fund public goods. Private money should fund any necessary remediation associated with polluting production practices that cannot be avoided, and ecosystem services that provide private benefit.

To help ensure that public money only funds public goods, the polluter pays principle should be enforced. All costs of services and production need to be internalised, including those attached to associated pollution. There may be areas of regulation or enforcement that require strengthening to achieve this. For example, water pollution remains an issue in England, with the Water Framework Directive target of all water bodies achieving good status by 2015 having been missed.

Separately from rectifying pollution and paying for ecosystem services that provide private benefit, companies may wish to provide additional funding to deliver wider benefits as part of their Corporate Social Responsibility programmes. Investing in the environment is in the long-term interest of businesses because it can provide indirect benefits such as climate change mitigation, protection of natural resources and improvements in staff wellbeing.

Private money should not be expected to top up lacking treasury funds to deliver public benefits as that would unfairly burden business and result in under delivery.

We do not consider that the ambitions of the 25 YEP can be efficiently met without addressing the key barriers raised in this report. We propose that acting on our recommendations would help support delivery of the 25 YEP goals.

The current ecological and climate crises the world is facing demand action. It is important the UK government shows strong leadership in addressing these difficult issues head on. The 25 YEP provides good ambition, now its delivery must be secured as a matter of urgency.

Alongside government leadership, we recognise the importance of efforts by a diverse range of actors to address the environment crisis. As such, CIWEM will be looking to support improved delivery by addressing training needs identified in relation to catchment coordinators.



6. CIWEM Activity

We have identified catchment partnerships as a key mechanism to delivery 25 YEP goals. They have a broad remit, well-established structure with access to local expertise, and a good track record of delivering improvements, as demonstrated through their annual monitoring and evaluation reports prepared by the CaBA Benefits Working Group.

An important issue that partnerships face is high turnover in catchment coordinators due to the insecurity of annually allocated funding. Whilst it is for government to address the causal funding issues, CIWEM can play a role in ensuring that staff turnover doesn't result in planning and delivery setbacks through providing expert training to those wishing to become catchment coordinators and existing coordinators who want to improve their skills.

Working with the Environment Agency and other stakeholders involved in catchment management, CIWEM is developing an online training course to equip those interested in catchment coordination with all the skills they need to facilitate effective catchment management. The course will cover knowledge and understanding, managing stakeholder relationships, data and evidence, project planning and management, and self-management.

In due course, details will be made available at www.ciwem.org/training/.

Appendix one: National maps of organisations

Environment Agency



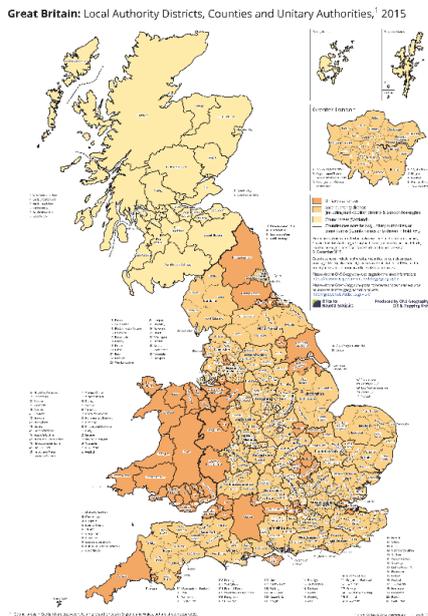
Source: GOV.UK²⁴⁹

Catchment Sensitive Farming



Source: Turner (2019)²⁵⁰

Local authorities



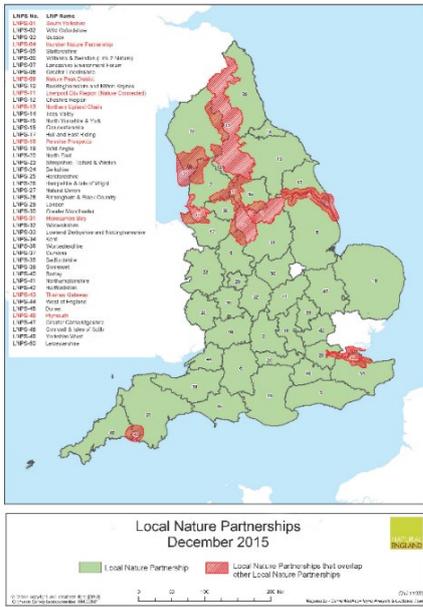
Source: Office for National Statistics (2015)²⁵¹

National Parks



Source: National Parks UK²⁵²

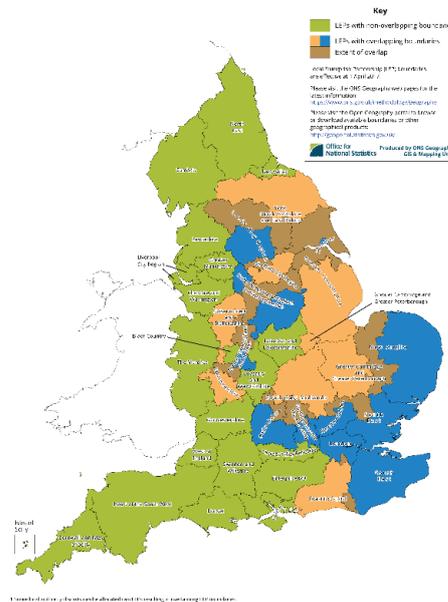
Local Nature Partnerships



Source: Defra and Natural England (2015)²⁵³

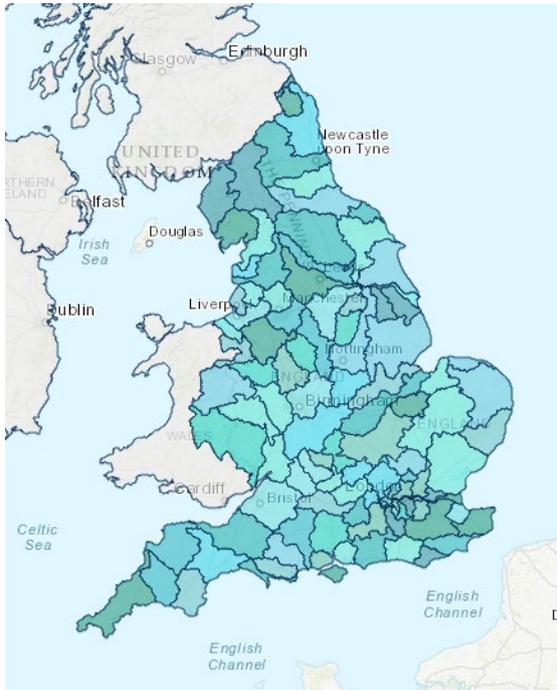
Local Enterprise Partnerships

England: Local Enterprise Partnerships (LEPs)¹, 2017



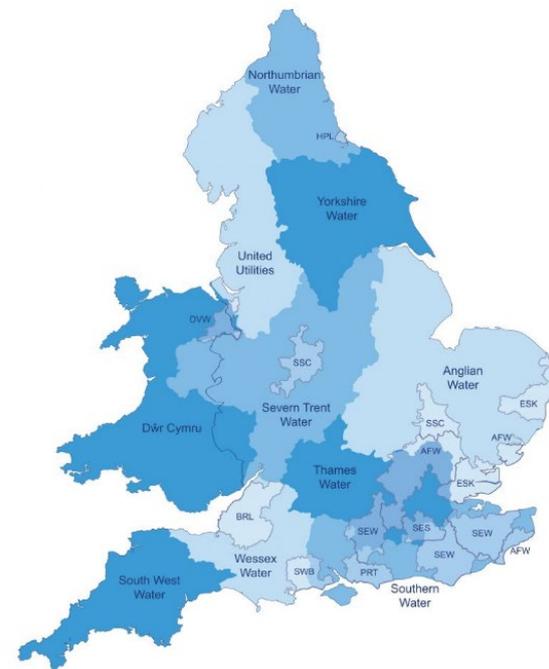
Source: Office for National Statistics (2017)²⁵⁴

Catchment Based Approach



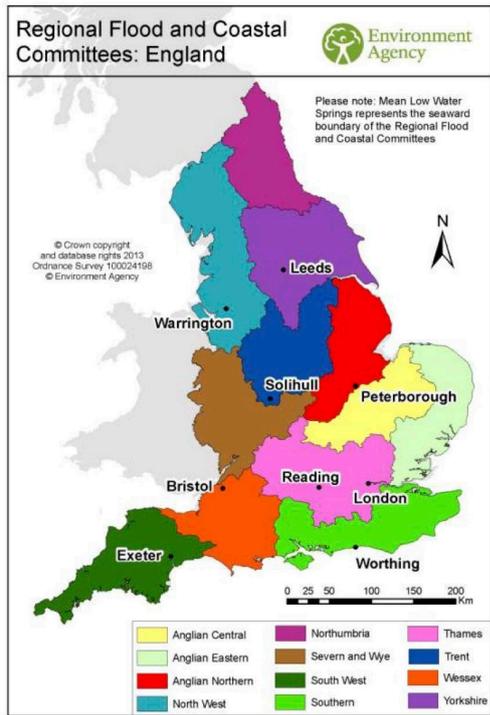
Source: The Catchment Based Approach (no date)²⁵⁵

Water companies



Source: Ofwat (2019)²⁵⁶

Regional Flood and Coastal Committees



Source: Gov.uk²⁵⁷

Internal Drainage boards



Source: ADA²⁵⁸

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