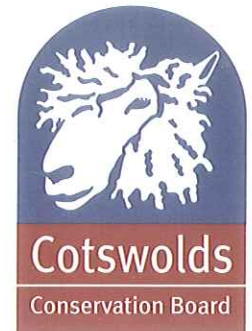


27 October 2010

Natural Environment White Paper Team
Area 3D
Nobel House
17, Smith Square
LONDON
SW1P 3JR



Dear Sir or Madam

AN INVITATION TO SHAPE THE NATURE OF ENGLAND

The Cotswolds Conservation Board welcomes the opportunity to respond to the discussion document 'An invitation to shape the Nature of England'. The paper has stimulated much thinking among members of the Board and its staff.

Background to comments

The Conservation Board for the Cotswolds Area of Outstanding Natural Beauty (AONB) was established by Parliamentary Order under Part IV of the Countryside and Rights of Way Act 2000. The purposes of the Board are:

- To conserve and enhance the natural beauty of the AONB
- To increase the understanding and enjoyment of the special qualities of the AONB

In carrying out its twin purposes, the Board has a duty to foster the economic and social well-being of its local communities.

The Board is responsible for producing the statutory management plan for the Cotswolds AONB and in doing so, involves a wide range of agencies, authorities, organisations and individuals with an interest in the Cotswolds through participatory events, surveys and consultation. The current plan has wide support and has been endorsed by 14 local authorities.

General comments

We make three general points:

1. The consultation document seems to come from a philosophical starting point that a price/value can be put on everything from nature; that nature is a good, a product or a service to be consumed in the market place. While it is welcome that the true economic value of ecosystem services is at last being recognised, the concept of ecosystem goods and services should also include the 'softer' values that the natural environment provides, such as recreation, heritage, culture, the arts and its spiritual worth, and not just the physical consumption of the resource. The Natural Environment White Paper should therefore be based upon a wide view of the value of ecosystem services.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

Cotswolds Conservation Board Fosse Way Northleach Gloucestershire GL54 3JH

Tel: 01451 862000 Fax: 01451 862001 Email: info@cotswoldsaonb.org.uk Website: www.cotswoldsaonb.org.uk

2. A fundamental problem which receives too little attention in the discussion document is the increasing disconnection between people and nature. Society as a whole and children in particular are in danger of having little or no real contact with the natural world. Not only are children's lives impoverished but, lacking first-hand knowledge of nature, they are unlikely to become adult citizens who appreciate nature, or who are motivated or committed to nature conservation. It is becoming clear that contact with the natural world has huge social, community and health benefits. It is also evident that an excessive concern for health and safety risks, and fear of litigation, discourages public and other bodies from taking children into natural environments. Re-connecting people and nature should be at the heart of the White Paper: doing so should be seen as a major aim of Big Society policies.

At the same time the general public have a relatively low level of awareness of the large number of opportunities that are available to access the natural environment. The opportunities provided by our AONBs, National Parks and National Nature Reserves should be recognised and promoted as a set of national assets for countryside exploration and enjoyment.

3. The environment has too often been seen as a secondary consideration in decision making. Though some progress has recently been made in the attention now given to climate change and energy issues, landscape and nature protection still lag well behind other government objectives. The White Paper should aim to elevate the environment up the agenda of all government departments, local authorities and other public bodies. This is particularly needed as our knowledge and understanding of the function and value of ecosystem services have improved over the past ten years and have shown the fundamental importance of nature to human well-being.

Question 1: What do we need to do to embed the true value of our natural resources in decision making at all levels?

- a. How can we reflect the different kinds of value described above?

Response: Decision making needs to be informed by a costs and benefits analysis which includes environmental impacts, both positive and negative. There is also the need to develop a consensus on the way to address non-monetarised values of nature, such as its importance to human fulfilment in terms of spiritual, recreation, cultural and artistic values. It is important to realise that not everything can have a price and a broad approach is required. In this respect, we note the importance of the TEEB study¹: this is work that should be given as much prominence in shaping decisions as that given to the Stern report.

Question 2: Have we identified the right overarching challenges for the White Paper to consider?

- a. If not, what should we focus on?

Response: The challenges identified in the discussion document of climate change, demographic changes and incremental impacts are correct. There are, however, others that need consideration:

The comment made above regarding the disconnection between people and nature is relevant here. It is an important additional issue that needs to be addressed and illustrates

¹ <http://www.teebweb.org/>

well a principle that should be followed throughout in the White Paper: causes should be tackled as much as the problems that they give rise to.

The Cotswolds AONB Management Plan identifies pressures from development, changing lifestyles and transportation as a challenge to the natural beauty of the area. The Plan notes that “unless effectively managed, all of these pressures will work cumulatively to impact adversely on both the landscape character and tranquillity of the area”.²

A sensitive area, but one that cannot be ignored, is the impact of an increasing population, globally and in the UK. As population increases, more pressure is applied to ecosystem services to a point where carrying capacity (see comments below) may be exceeded and the ecosystem service damaged or even destroyed.

Whilst not of direct concern to the Cotswolds, the challenge of ocean acidification and that of sea-level rise as a result of global warming should be a national priority for the White Paper.

b. How should we approach these challenges?

Response: By developing adequately resourced management structures, policies and actions that effectively mitigate and adapt to the impacts of the identified challenges at international, national and local level. Such actions should include support for agri-environment schemes that deliver a wider range of ecosystem services. Also, weight needs to be given to ecosystem services in the forthcoming National Planning Statements and in other guidance issued by government.

One approach that merits consideration is that of “carrying capacity”, i.e. working within limits which ensure that an ecosystem service in an area can continue to perform its essential functions. We give two examples of this approach from within the Cotswolds:

1. The National Character Areas provide a useful model. The Cotswolds Conservation Board has developed these further into a series of local landscape character areas which identify the distinctive environmental character of each part of the area and so help to guide development and land management along acceptable lines.
2. A number of important aquifers in the Cotswolds help to supply water to the South East. It has been shown through the Catchment Abstraction Management Strategy that some of these aquifers are unable to provide additional water supply for human consumption without damaging impacts on aquatic ecosystems and lowering of water tables. The danger is all the greater because climate change predictions indicate that the ability of aquifers to supply water will be further reduced in warmer, drier summers, thus affecting the capacity of the Cotswolds to grow food crops. The provision of other ecosystem services may also be affected, such as carbon sequestration and flood management.

Question 3: What are the existing policies and practices aimed at protecting England’s natural assets (including but not limited to those set out above on our biodiversity, seas, water bodies, air and soil) that currently work most effectively?

a. What works less well – what could we stop doing or do differently?

² Cotswolds AONB Management Plan 2008-13

http://www.cotswoldsaonb.org.uk/management_plan/

Response: The current approach is clearly not working well in all cases – loss of natural assets is continuing. The approach to biodiversity in particular, where small pockets of a particular habitat or species are “protected” by SSSIs is clearly insufficient. A much more resilient, proactive large scale approach is required, working with the farming community, and other land users, to help improve the prospects for nature on a landscape scale. So we warmly welcome the Lawton Report, which sets out what is needed. The White Paper should endorse the strategy in the report and show how the individual recommendations will be acted upon.

An example of existing practice and policy that works well is England’s network of protected landscapes, i.e. Areas of Outstanding Natural Beauty and National Parks. These areas, through their management plans and projects, are working on a landscape scale. The protection and enhancement of ecosystem services is a key outcome. The recent Countryside Quality Counts results gave the Cotswolds AONB a rating of ‘Enhancing’, an indication that the designation works.³

Question 4: What mechanisms should we focus on to ensure we manage our natural systems more effectively in future?

Response: Straightforward mechanisms which enthuse, encourage and incentivise landowners to manage natural systems, rather than policies which tend to deter activity and at best encourage a do-nothing approach.

The planning system also has a part to play through developer contributions under Section 106 agreements and the Community Infrastructure Levy which will largely replace these, for example to fund Green Infrastructure. The government’s proposals to develop the idea of Conservation Credits will also be relevant. Likewise the Lawton report proposals for habitat banking. In addition, it will be vital that the new National Planning Statements contain the right policies for protecting and managing natural systems.

a. How should we define success?

Response: By securing measurable improvements in the natural environment.

b. How can we agree on common goals and assess our progress towards them?

Response: By consensus based on science and developing shared goals and aspirations. A good example is the management plan for the Cotswolds AONB where a wide variety of stakeholders were engaged in its preparation through participation and consultation. There was agreement on what is important and what needs to be done and this was collated in the management plan, the targets of which provide a means to measure success, and which enjoy wide public support.

Question 5: How best can we reduce our footprint on the natural environment abroad, through the goods, services and products we use?

Response: The simplest answer is generally to consume less, vigorously promote local produce, encourage the repair and renewal of products and equipment rather than their replacement, and reduce the need to travel and to import goods. Demonstrating the true cost on ecosystem services of imported goods would be a real eye-opener. There is an important role for organisations such as the Conservation Board to lead by example by reducing their

³ Countryside-quality-counts.org.uk

own consumption, sourcing more products and services locally, and encouraging others to do the same.

Question 6: What best practice and innovative approaches to protecting and enhancing our natural environment do you think should be considered as we develop the White Paper?

Response: The Cotswolds Conservation Board welcomes the intention to devolve more power and decision making to a local level. We would suggest that protected landscapes offer a range of management models. In the Cotswolds, a statutory body is charged to lead the management of the AONB and to work with other public bodies, local communities and civil society organisations that have a direct role in managing the natural environment within a distinctive landscape area, so as to deliver improvements in landscape and nature and a greater appreciation of the special qualities of the area. However, resources also need to be devolved to the local level if this activity to be truly successful and realise its full potential.

Question 7: How best can we harness and build on public enthusiasm for the natural environment so people can help improve it through local action, as informed consumers or by shaping policy?

Response: By opening up genuine opportunities for people to become engaged, either directly through "hands on activity", or by providing activities which those with little direct contact with the natural environment can contribute to decision making. For example, the Cotswolds Conservation Board is supported by voluntary wardens, 350 local people who deliver a wide range of "on the ground" projects, guided walks, and interpretation and education. One lesson that might be drawn from this activity is that the motivation for commitment lies in love of the Cotswolds – the 'power of place' is what drives the enthusiasm of the Cotswold Voluntary Wardens.

The voluntary wardens also assist a wide range of organisations in achieving their outcomes - from Natural England, Highway Authorities and English Heritage to the National Trust, parish councils and community groups. During 2009/10, the wardens contributed over 41,000 hours of activity. The voluntary wardens are part of the Cotswolds Conservation Board and are a good example of the 'Big Society' being delivered at a local level. It should also be noted that the Board Members of the Cotswolds Conservation Board are also volunteers.

Building on this principle, we believe that there may be an opportunity to develop a 'Big Green Society' initiative that uses the environment as a resource to develop skills and knowledge for those leaving school and moving on to further education through a green gap year. It could also be of value to the many thousands of people who may become unemployed as a result of cuts in public spending and to those who retire early.

The Conservation Board, through its rural skills training programme, has demonstrated the interest in dry stone walling and hedgelaying with over 1,200 individuals attending training courses over the past 9 years. These courses are continuing and the programme is expanding adding in coppicing and green wood-working. Whilst the courses mostly attract people from the Cotswolds and immediate area, others come from further afield, staying in local accommodation.

Question 8: What should be our vision for the role of Civil Society in managing and enhancing the natural environment and for engaging individuals, businesses and communities in setting the agenda for that work?

Response: Civil Society organisations already play a significant role in the conservation and enhancement of the natural environment and should be encouraged to do so even more. The management of natural assets by such organisations can generate significant engagement by members of the public and communities in the vicinity: engagement can either be direct “hands on” activity, or less directly through land purchase for conservation, fund raising etc. Responsible civil society organisations and businesses work in partnership with statutory bodies to contribute to joint aims and objectives. However, successful voluntary action needs support and resources including training, insurance, co-ordination and equipment. Whilst volunteers are people who give their time for free, there is no such thing as a free volunteer.

Question 9: How best can Government incentivise innovative and effective action on the natural environment, across England, at the local level?

a. How best can local government and other local partners work together to improve local outcomes on the natural environment, and pursue a more integrated approach linking a healthy natural environment to economic prosperity, sustainable development and a better quality of life, health and wellbeing?

Response: This question embraces exactly the management approach taken in protected landscapes and particularly in the Cotswolds Area of Outstanding Natural Beauty. Here, a small statutory body, the Cotswolds Conservation Board, with clearly defined purposes and duties, can energise and encourage a range of other statutory bodies, civil society organisations, businesses and communities (both within and outside the designated area) to work together to an agreed long term plan to conserve and enhance the natural assets of the area while also having regard to the social and economic aspirations of local communities.

A possible new approach could be to manage each National Character Area (NCAs) in this way. The new style National Character Area profiles being developed by Natural England are in effect management plans for areas of land with a common range of natural assets, landscape character, biodiversity etc. Many NCAs coincide with AONBs, National Parks and other large scale landscape projects such as the National Forest and Community Forests. Consequently, many NCAs can be covered using existing organisations, making fuller use of what is already there.

b. What are the most effective mechanisms for managing the natural environment where cross-boundary issues are involved, and making the link to other mechanisms for economic growth, transport and planning?

Response: Landscape scale natural assets rarely reflect administrative boundaries. The Cotswolds AONB includes parts of three regions, 15 local authorities, two water distribution companies, three electricity distribution companies, three strategic health authorities, and seven primary care organisations (health); and a number of Local Enterprise Partnerships are likely to be created. The small scale statutory board model described in the response to Q9a has been shown to be able to be responsive to the needs of an administratively complex area, bringing consistency of approach to policy formulation and action to deliver commonly agreed goals in the field of conservation of nature and landscape. Such a model could be envisaged for each NCA, as suggested above.

c. How best can the value of the natural environment be considered within local planning?

Response: The natural environment can best be considered when the implications and benefits of any proposed action or development are properly understood. This requires a level of knowledge at an appropriate scale for informed decisions to be made. Such knowledge may be available through work undertaken by a statutory body or a civil society organisation. This information needs to be shared and consensus reached on its validity and significance. The importance of research to improve the understanding of the working of the natural environment, both at a local and landscape scale, should not be underestimated.

Question 10: How best could the economy reflect the true value of nature's services in the way business is done, to drive smarter, greener growth?

Response: By reallocating the true costs of dealing with harm being caused to natural assets, which are generally being borne by the taxpayer and the consumer (or indeed future generations) rather than by the causal agent.

Consumers should be made fully aware of the true cost to the environment of the goods and services they are purchasing, and bear the full cost rather than it being a cost to society in general. This would lead to more informed decision making by consumers.

Businesses that rely on nature's services as a principal asset should invest in that asset. An example are the few visitor payback schemes across England, such as in the Lake District, and recently piloted in the Cotswolds AONB, where tourism invests directly in supporting landscape management and improvement, such as footpath repair. The importance of landscape and access to the tourism sector and local businesses more generally was highlighted during the Foot and Mouth outbreak in 2001. However this has been quickly forgotten.

Question 11: Responsible businesses are already looking for ways to reduce their impact on the environment. How can we encourage more action like this?

Response: By promoting good practice examples of successful businesses reducing their environmental impact, with examples drawn from each sector of the economy to encourage others. Also, by a combination of fiscal and other incentives. Action in this area should be promoted to businesses as part of their corporate social responsibility and contribution to the Government's sustainable development goals.

An example from the Cotswolds is where the Conservation Board is working with local authorities to pilot a green accreditation scheme for accommodation providers and attractions, to reward them for reducing their impact on the environment of the AONB.

Question 12 – What are the barriers to joining up and seeking multiple benefits from our natural assets?

Response: The main barrier is 'silo thinking' where organisations which have defined aims and objectives pursue their own remit in their own administrative area with little consideration of others interests. Regulatory mechanisms often have the result of reinforcing the narrow objectives of a particular piece of legislation. Individual landowners, businesses and community organisations are often frustrated by the multiple sources of information and support which they need to access in order to deliver multiple benefits for the environment in addition to their primary objective, be it farming, forestry or some other land based business. What is needed is local provision of advice which can access information from organisations or providers working at a larger scale.

There are, however, some encouraging local examples where 'silo thinking' has been tackled. For example:

- The Cotswold Local Strategic Partnership and the Gloucestershire Health Community and Wellbeing Partnership have worked together with the PCT, Gloucestershire Food Vision, Active Gloucestershire and Gloucestershire County Council in a series of initiatives to promote locally produced food, healthy walks in the countryside, twinning inner City schools with rural schools to promote the knowledge of the countryside and sharing of cultures - and more.
- The Cotswold Tree Warden Scheme, which covers all the AONB organizes field trips and seminars, including talking to Community Groups about setting up Community Orchards, developing composting sites and recently getting a 'green gym' initiative underway in the garden of Cirencester Hospital (to understand plant/garden management and keep fit at the same time). There is now also a 'Bike to Work' scheme to promote exercise and stop pollution by not using the car, aided by a loan to buy the bike initially.

Section 85 of the Countryside and Rights of Way 2000, placed a duty on local authorities and other public bodies to "have regard to the purposes of AONB designation" in undertaking their functions (there is an equivalent requirement in for National Parks). The provision is potentially very helpful but has proved to be largely ineffective and requires strengthening.

Question 13 – What are the barriers to thinking big and taking a landscape scale approach to managing our natural assets?

Response: A significant barrier is administrative boundaries such as County and District Authority areas. Local Authorities have competing multiple objectives such as education, waste, social services and transport which often lead to a lack of clarity or focus. There is a real need to raise the importance of ecosystem services and put in place a set of clear and focussed environmental objectives.

What is required is an appropriate scale organisation with sufficient authority and resources to require disparate statutory bodies to work together at a landscape scale (see response to (Q.9). It is vital to understand the need to think and act at a larger scale. Current administrative boundaries, particularly of local authorities, tend to militate against such action.

Also, while localism is a welcome new thrust of policy, it needs to be complemented by action at a larger geographical scale to address certain environmental issues – such as is required by river basin management.

Question 14: What should be the priorities for the UK's role in EU and international action, to protect and enhance the natural environment at home and abroad?

Response: The UK should strive to be an exemplar in the delivery of the Convention on Biological Diversity and the European Landscape Convention.

The UK should press for a thorough review of the Common Agricultural Policy to ensure delivery of a wider range of environmental benefits through agri-environment schemes and cross compliance.

Following on from the issue raised in our response to question 2a, there is the need to address the enormous challenge created by global demographic change and in particular the threat to biodiversity caused by population growth; and to recognise the true environmental costs of goods traded globally. A good example is palm oil production for export resulting in the loss of tropical rainforest. The UK should be showing leadership on these difficult issues.

Question 15: If you could choose *just one* priority action for the Natural Environment White Paper to drive forward locally, nationally or internationally – what would it be?

Response: To ensure all sections of government are committed to the 'Nature of England'

If you would like to discuss any of the Board's response in greater detail please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Martin Lane', with a long horizontal flourish extending to the right.

Martin Lane
Director