



The
Wildlife
Trusts

Nature Recovery Green Paper and Environment Act targets consultations

The Wildlife Trusts' briefing



“The ultimate goal of this work is to better enable nature’s recovery.”

The Rt Hon George Eustice MP, Environment Secretary, on the Nature Recovery Green Paper

On 16th March, the UK Government published two major documents on nature and biodiversity: a **Nature Recovery Green Paper** and a **consultation on the proposed Environment Act targets**.

The Nature Recovery Green Paper proposals aim to halt nature’s decline by 2030 by outlining changes to protections for sites and species, and gives details on the Government’s plans for delivering 30% protection of land and seas in England by 2030. The protected site network helps to ensure many of England’s most important places for nature have long-term protection and good management. Strengthening the protections for these valuable places will be crucial if the Government wants to halt the decline in nature.



Westhay Nature Reserve on the Somerset Levels is one of many sites which needs strong protections (Paul Harris)

The consultation on **Environmental Targets** sets out the proposed long-term legally binding targets for nature, water, waste and air quality – a requirement under the Environment Act 2021. These targets are intended to provide the legal foundation for nature’s recovery – requiring action across Government to turn the tide on nature’s decline.

What Nature Needs

We face an urgent nature and climate crisis. The situation is dire, with more than one in ten species in England on the brink of extinction and the UK amongst the most nature-depleted countries in the world. The latest report from the IPCC found that global emissions continue to rise, and we are still on track for temperatures to increase more than 1.5°C.

To tackle this, we urgently need a coherent plan for nature’s recovery on land and at sea. The Wildlife Trusts believe the UK Government’s current consultations on the Nature Recovery Green Paper and Environmental Targets fall short of providing us with such a plan. Rather than transforming the way we protect and enhance nature, the proposals potentially weaken the existing system or create change for the sake of change in a manner which is likely to confuse developers, industry, and nature conservation organisations.

The Government has a unique opportunity to halt the decline in biodiversity and expand nature-based solutions to climate change. **Unfortunately, the proposals in the Green Paper focus too much on simplifying process and entail extensive procedural change with little benefit for nature.** This could lead to more litigation, greater costs, and weaker protection for nature.

To halt nature’s decline by 2030, the Green Paper should set out stronger protection for sites and species. All protected sites should be afforded greater protection from harm, including off-site and cumulative impacts, ruling out damaging activities and development. Furthermore, Defra should set out an expedited process for completing the protected site network.

This should be supported by environmental targets that will put us on the path to restoring nature. **However, the limited ambition of the proposed targets could mean that nature is in a worse condition in 20 years than it is currently.** With the final targets due to be laid before Parliament in October, they must be strengthened to live up to the UK Government's promise to leave the environment in a better state for the next generation.

What needs to change?

We want to see the following three changes made to the Government's proposals in the Nature Recovery Green Paper and Environmental Targets consultation

1) **Making more space for nature through 30by30**

The Nature Recovery Green Paper sets out how the Government will meet its commitment to protecting 30% of land and sea for nature by 2030, known as "30by30". But it seriously underestimates the effort required to meet this vital target by inaccurately suggesting that 26% of land in England is already protected for nature. This figure includes all National Parks and Areas of Outstanding Natural Beauty (AONBs) and Sites of Special Scientific Interest (SSSIs). Most of these designations are not specifically designed to protect nature and many designated sites are poorly managed, not in a good condition for nature, and have not been monitored for years.



Dark-bellied brent geese at the Kentish Flats offshore wind farm, near Swale (Terry Whittaker)

In reality, it is estimated that [only 3% of land could reliably be said to be specifically protected for nature.](#) Just 8% of land is designated as a SSSI, of which less than 40% are in favourable condition. At sea, 40% of the English sea bed is designated as a Marine Protected Area, but damaging fishing practices such as bottom trawling continue to damage to these sites, whilst developments like offshore wind farms are currently been planned in many of the supposedly protected offshore sites.

To reach 30by30, proposals in the Green Paper must be improved to focus on strengthening the protections for our most valuable wildlife sites and accelerating the completion of the protected site network.

These areas, once protected for the long-term, effectively managed for nature's recovery, and in good or recovering condition, can then contribute to the 30% target and sit at the heart of a wider Nature Recovery Network (NRN) that is embedded within rural and urban communities across the country.

Progress towards 30by30 would be further aided by new statutory protections for land that has the potential to be rich in biodiversity in the future. Currently there is no way to protect these promising sites from development. A new planning designation – Wildbelt – would allow land of low biodiversity value to be restored for nature, connecting existing habitats and protected landscapes, and giving wildlife the space it needs to thrive. A new Wildbelt designation would also help ensure the planning system is better suited to addressing the climate and nature crises, rather than prioritising short-term inappropriate development.

This approach must extend to the marine environment too. Designating 30% of our seas as Highly Protected Marine Areas and greater protection for our wider seas, through sustainable fishing policies, mapping of blue carbon stores and strategic marine spatial planning, can enable nature's recovery at sea and allow nature to sequester more carbon.

2) Ambitious targets that drive recovery

Legally binding targets are the centerpiece of the Environment Act's framework for restoring nature. If done well, they can provide the long-term certainty needed to drive action and investment in environmental restoration and ensure that future governments are held accountable for their action on nature. Unfortunately, the Government's initial proposals are limited in scope and ambition. The final targets are due to be laid before Parliament in October – the proposals must be strengthened in order to live up to the Government's promise of passing on nature in better condition for the next generation.

The Wildlife Trusts would like to see three major changes made:

- **A stronger species abundance target:** The target to increase the abundance of wildlife by 10% by 2042 compared to 2030 levels is too weak and too uncertain. If, as expected, wildlife continues to decline for the rest of the decade, it could mean that wildlife is less abundant by 2042 than it is now. This falls short of the Government's promise to pass on nature to the next generation in better condition.

Instead, the Government should set a target to increase the abundance of marine and terrestrial species by at least 20% by 2042 compared to 2022 levels.

- **A target for protected sites condition:** The extent and quality of habitats are crucial to nature's recovery. At the moment, just 38% of SSSIs in England are in favourable condition, despite being some of the most precious sites for nature. Yet the Government has not proposed a statutory target to improve the state of protected sites, despite its commitment in the 25 Year Environment Plan to ensure that three quarters are in good condition.

The Government should set a habitats target for at least 75% of our finest wildlife sites (SSSIs) to be in favourable condition by 2042.

- **An overall target for water:** We have some of the worst-quality rivers in Europe. Pollution from agriculture, sewage, roads and plastics is destroying freshwater habitats and making our rivers dangerous for both humans and wildlife. Currently River Basin Management Plans set a target for improvement, but after 2027 there will be no overall target holding the Government to account. The four targets proposed could mean we see improvements in pollution from



Healthy rivers will allow successful reintroductions of beloved species like the European Otter (Andy Rouse)

particular sources, whilst the overall health of our rivers, lakes, estuaries and coasts continues to decline. In particular, agricultural water pollution is overlooked and the target for water companies does not cover nitrates or sewer overflows.

The Government should set a long-term “outcome” target for at least 75% of rivers, streams and other freshwater bodies to reach an overall “clean waters” status by 2042, in addition to stronger targets for pollution reduction and abstraction reduction.

3) Arms-length bodies to be focused on nature and climate

If we are to deal with the climate and nature crises we need to fund Defra’s arms-length bodies properly. Currently the vital work done by the arms-length bodies is hampered by a lack of funding and a structure which makes joined-up working difficult. This has resulted in a number of problems in the natural environment which have proved difficult to solve under the current structure.

For example, currently policy and regulation means that waterways like the River Wye are being heavily contaminated by pollution from agricultural sources. Pressures from agriculture now cause 40% of waterbodies to fail water quality targets, with the sector now responsible for the biggest number of failures. The current regime seems unable to develop a collective approach to these significant issues, suggesting there is a need for change to allow the appropriate action to be taken to clean up our rivers to shake up the system and deal some of these systemic failings.

In light of the nature and climate crisis, we also believe there is an immediate need to change the Forestry Commission’s terms of reference to ensure it has a duty to enhance biodiversity and mitigate climate change. Woodlands are habitats for beloved species and ecosystems in their own right, and we know that healthy, resilient woodlands can store carbon and reduce the



Woodlands are vital ecosystems and the Forestry Commission’s purpose must reflect this (Ben Hall)

risk of flooding. Yet the Forestry Commission’s terms of reference make clear that its primary purpose is to maintain trees for timber production. Too often Forestry Commission woodlands lack diversity and are devoid of wildlife. We need a new body focused on promoting woodlands that are humming with wildlife, locking up carbon and providing natural flood defences where needed. Similarly, the Environment Agency’s remit must also give them a duty to further nature’s recovery and adapt to climate change.

In the Nature Recovery Green Paper, the Government proposes reform of public bodies, arguing that the regulatory landscape has become fragmented and complex. We agree that improvements in Defra’s agencies are needed, particularly in regulation and enforcement. However, wider reform of public bodies could expend significant time and effort, while holding back delivery of environmental objectives. Institutional improvement could be made by setting nature’s recovery—and in particular achievement of statutory nature and climate targets—as statutory purposes for all existing public bodies, including the Forestry Commission, Rural Payments Agency and Marine Management Organisation.