

Defra consultation on Environmental Targets
The Wildlife Trusts response
June 2022



Introduction

We face an urgent nature and climate crisis. The situation is dire, with one in ten species in England on the brink of extinction and the UK amongst the most nature-depleted countries in the world. Currently, just 3% of land and 4% of sea in England can be said to be protected and effectively managed and meeting the Government's commitment to 30 by 30. Meanwhile the latest report from the IPCC found that global emissions continue to rise and despite governments and communities around the world taking action, we are still on track for temperatures to increase more than 1.5°C. We need to keep 1.5 alive using clear evidence-based plans and policies that combat and adapt to climate change, with continual monitoring of progress to ensure we restrict global warming to within this threshold. But we are running out of time.

We urgently need a coherent and coordinated plan for nature's recovery on land and at sea. The Wildlife Trusts believe that the UK Government's consultations on the Nature Recovery Green Paper and Environmental Targets do not provide us with such a plan, nor the level of ambition required to enable nature to recover and thrive. Legally binding targets are the centrepiece of the Environment Act's framework for restoring nature. If they are done well, they will provide the long-term certainty needed to drive action and investment in environmental restoration. Unfortunately, the Government's initial proposals – especially the biodiversity targets – are limited in both scope and ambition. The proposed targets must be strengthened before they are laid before Parliament in October 2022 if the Government is to achieve its promise to be the first generation to leave the environment in a better state than we found it.

In addition to the long-term legally binding targets, it is essential that there are also shorter-term interim targets and milestones to both assess progress towards the targets and, if need be, increase the level of activity and action to ensure that we remain on track and that, ultimately, the targets are achieved. There is also a need for a clear delivery plan so we welcome the commitment to include this within the Environmental Improvement Plan.

The Wildlife Trusts provided an initial response to the Defra consultation on environmental targets (11 May 2022). This response supersedes that submission and includes our views having reviewed the various evidence reports and/or impact assessment documents. Also included is a summary of the views provided by members of the public who agree that the level of ambition in the proposed species abundance target is not enough (see Annex 1).

Target proposals for biodiversity on land

Legally binding targets are the centrepiece of the Environment Act's framework for restoring nature. The Wildlife Trusts welcome that Defra is proposing to go further than the statutory minimum of a single biodiversity target. However, these are not the right targets, and lack the ambition needed to secure nature's recovery. To be able to effectively measure the health of our natural environment, we need a

broad suite of indicators (in a similar way to the England Biodiversity Indicators¹). Targets for species abundance, extinction risk and habitat created will only take us so far to really understand whether we are sufficiently addressing the pressures and drivers that have caused so much of the decline in our natural environment over the past few decades and whether we really are on a path towards nature's recovery.

A legally binding protected sites target based on condition needs to be introduced at the earliest possible opportunity. By 2042, at least 75% of SSSIs should be in favourable condition and the remaining 25% showing evidence, based on monitoring, that SSSI features are making progress towards ecological recovery. Despite Outcomes in *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*², which included getting at least 50% of SSSIs into favourable condition by 2020, we have been languishing at about 38% for the last few years. Consequently, nature across the country has continued to decline. The Biodiversity Terrestrial and Freshwater targets Detailed Evidence Report³ also recognises that “*maintaining and improving our protected sites will remain critical, including to our delivery plan for other targets.*” A legally binding protected sites target would give statutory support to the policy commitment in the 25 Year Environment Plan to get 75% of SSSIs into favourable condition by 2042 and would complement the proposed wider-habitats target. **We also need to see greater commitment and action on achieving 30 by 30.** The various mechanisms required to achieve these biodiversity targets – e.g. 30 by 30, Local Nature Recovery Strategies, the Nature Recovery Network, and a new agri-environment scheme – are not being implemented with the urgency and/or coordination required. We need greater action, intensity and drive now.

2030 and long-term species abundance targets

Government has proposed to:

- halt the decline in species abundance by 2030
- increase species abundance by at least 10% by 2042, compared to 2030 levels

We have little confidence that the government can halt the loss of biodiversity quickly, and expect that by 2030, even if the loss is halted, biodiversity will be far less abundant than it is today. Therefore, an increase of 10% on 2030 levels may result in less biodiversity by 2042 than we have today. This is unacceptable in the face of an ecological emergency, especially when Government's stated ambition is nature's recovery. **We believe that the target should be to increase species abundance by at least 20% by 2042, compared to 2022 levels.**

Halt the decline in species abundance by 2030

The Wildlife Trusts welcome the legally binding target in the Environment Act to halt the decline in species abundance by 2030.

¹ <https://www.gov.uk/government/statistics/england-biodiversity-indicators>

² Defra (2011) *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb135_83-biodiversity-strategy-2020-111111.pdf

³ https://consult.defra.gov.uk/natural-environment-policy/consultation-on-environmental-targets/supporting_documents/Biodiversity%20terrestrial%20and%20freshwater%20targets%20%20Detailed%20evidence%20report.pdf

However, we are concerned at the lack of urgency. Given repeated past failures to meet international targets to halt biodiversity loss⁴, Government must take urgent action now through a range of integrated measures – such as delivering the commitment to protect 30% of land and sea by 2030 – to ensure we comfortably meet the target of halting the decline in species abundance by 2030 and that by then, we have begun to put nature on the path to recovery.

We have a number of recommendations for the development of the species abundance indicator that will measure progress towards this target:

- It must be possible to interrogate the abundance indicator to understand species trends, so we can know if the decline (or recovery) of certain species groups is being masked by the trends of other species. In a similar way, it would be vital to be able to understand any geographic differences in species trends across the country. However, the Detailed Evidence report does not provide a list of the species included in the indicator – just the number in each taxonomic group.
- Based on the information within the consultation documents and the Detailed Evidence report, we still have a number of questions relating to the indicator in terms of what averaging period or timeframe is going to be used for the data to be confident that the target of halting the decline has been met (and that it isn't just fluctuations in trends).
- We welcome the inclusion of marine birds (which nest on land but forage at sea) in the abundance indicator but, given the lack of marine species, it is essentially a terrestrial and freshwater species indicator. However, we believe there are long-term datasets available to enable the inclusion of additional marine species, enabling a more holistic assessment of species' abundance in English seas. These may include:
 - The Special Committee on Seals (SCOS) collects data on the populations of grey seals and harbor seals around the UK, and breaks down data by nation to allow for an English level assessment. <http://www.smru.st-andrews.ac.uk/scos/scos-reports/>
 - The SCANS-III (Small Cetaceans in European Atlantic Waters and the North Sea) report provides estimates of abundances for cetaceans in European Atlantic waters which have been used to inform the MSFD assessments in 2018. While it contains data for European Atlantic waters, the area has been split into blocks for surveying which could allow for the extraction of data relating to UK Secretary of State (SoS) and/or English waters <https://scans3.wp.st-andrews.ac.uk/2017/05/01/revised-results/>
 - Continuous Plankton Recorder (<https://www.cprsurvey.org/>) provides an extensive database of marine plankton and associated metadata. This database could provide the necessary data on plankton around SoS and /or English waters to establish a long-term target. Plankton underpins our marine food chains, and it is essential we have a high level of ambition to halt any declines in plankton abundances. We are already seeing a change in plankton distribution in the North Sea due to climate change, which is impacting fish and bird populations. To avoid further disruption to the food chains we need to be working towards protecting marine plankton from further changes and declines.

⁴ In 2010, the UK Government signed up to a set of international targets designed to halt the loss of biodiversity globally by 2020. The UK's Sixth National Report showed that the UK failed in its contribution towards this global goal and reported "an overall picture of ongoing species decline" - JNCC (2019) *Sixth National Report to the United Nations Convention on Biological Diversity: United Kingdom of Great Britain and Northern Ireland*. JNCC, Peterborough <https://data.jncc.gov.uk/data/527ff89f-5f6b-4e06-bde6-b823e0ddcb9a/UK-CBD-6NR-v2-web.pdf>

- DASSH (<https://www.dassh.ac.uk>) the archive for marine species and habitats data, contains a repository of UK marine data for both species and habitats which could be used to provide baseline data to underpin a long-term target for non-mobile marine species.
- Seasearch provides validated marine records collected by citizen scientists. This is a valuable, long term data set of fish, seaweeds and benthic animals found around our seas. While it is UK-wide, data is available for each region separately.

Increase species abundance by at least 10% by 2042, compared to 2030 levels

The Wildlife Trusts disagree with the level of ambition for the long-term species abundance target. We do not believe that a 10% increase is ambitious enough over the timescale given the parlous state wildlife is currently in.

We also disagree with 2030 being the baseline year. As we know, since 1970, 41% of UK species have decreased in abundance⁵. The consultation document mentions that *“in the past 20 years, the average change in the England priority species index has been a decline of approximately 2% per year”* and there is a real risk that species declines will continue until 2030 albeit perhaps at a slowing rate. Yet, the ambition of only a 10% increase on the 2030 level means the target could result in less nature in 2042 than we do today in 2022. This cannot be right both as an ambition nor is it in line with existing policies where the stated ambition is to leave nature in a better state than it was found. The Detailed Evidence Report even says that *“UKCEH’s analysis also suggests that the level of improvement necessary to halt the decline by 2030 would result in a 2042 index value similar to 2022 and be roughly equivalent to a 10% increase on the 2030 value”*. Does a 10% increase on 2030 and species being at a similar level in 2042 to 2022 genuinely fit with that ambition to secure nature’s recovery? We would suggest it doesn’t and that a greater level of recovery is not only required but also deliverable.

In addition, many of the other targets being consulted on use 2022 as the baseline year and no other targets have a baseline that is in the future. A baseline of 2022 would give a known, solid start point (rather than an undetermined point of where the indicator might be in 2030) along with the long-term certainty and clear direction that the targets aim to provide. We do not believe species decline needs to be halted before action is taken to reverse it. In fact, action to increase species abundance needs to start now even just to halt the decline. **We suggest that the target should be to increase species abundance by at least 20% by 2042, compared to 2022 levels.**

After receiving feedback that the Government consultation was not clear or user friendly enough for the majority of the public to respond to confidently, The Wildlife Trusts has enabled people to give their views in particular on the questions relating to the species abundance target. As of 27 June 2022, 60,575 people agree with The Wildlife Trusts that the level of ambition in the proposed target is not enough. People also gave their views on why the UK Government should prioritise nature’s recovery including reasons why the Government should consider a different level of ambition. A summary of these responses are provided in Annex 1.

Long-term species extinction risk target

Government has proposed to:

- improve the England-level GB Red List Index of species extinction risk by 2042, compared to 2022 levels.

⁵ State of Nature Partnership (2019) *State of Nature 2019* <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf>

The Wildlife Trusts agree that there should be a species extinction risk target to try and prevent the loss of our rarest species and also to stop species experiencing further decline into higher threat categories. We recognise the work done to try and develop a metric based on the GB Red List Index including the suggestion that as more Red Lists are published, the indicator can be expanded. However, at the moment, there are significant data gaps (e.g. marine species and freshwater species) and the metric is incomplete, untested and won't be published until September 2022. **We do not believe the proposed species extinction risk target, in the current form, is adequate or sufficiently ambitious to guide activity to halt nature's decline.** The target is both vague and flawed with no specific outcome other than to 'improve'. Without being specific on what is meant, it will not be possible to set interim milestones and/or trajectories for achieving the target nor assess and evaluate whether delivery mechanisms are adequate and that progress is on track. We urge the Government to set a quantified measure of improvement. And, the Detailed Evidence Report also sets out a *"requirement for targets to be quantitative and allow a clear assessment of when the target has been met..."* (pg43).

The Detailed Evidence Report suggests that even substantial successes in species recovery will only result in very small increases in the Red List Index and is a reason given for not setting a quantitative target. The RSPB has done some work on the proposals and suggest expressing the Red List Index in a different way by considering the total net number of status improvements (i.e. a move of one Red List category) required to get all species to the Least Concern category . We support the RSPB's **suggestion for a target to 'reduce the threat of species extinction by 30% by 2042, where extinction risk is assessed using the England-level GB Red List Index. If achieved, this target would see the Red List Index increase by at least 2.5% by 2042, compared to the 2022 level, indicating an improvement in species status'**.

Long-term wider habitats target

Government has proposed to:

- to create or restore in excess of 500,000 hectares of a range of wildlife-rich habitat outside protected sites by 2042, compared to 2022 levels

Level of ambition

The Wildlife Trusts support Defra converting the 25 Year Environment Plan commitment into a legally binding, long-term target. However, we do not believe the current target is ambitious enough. We want to see **a minimum net target for 750,000 hectares of good quality habitat created or restored outside of protected sites by 2042, with significant progress towards the target being made by 2030.** In addition, 69% of participants at an expert workshop thought the level of ambition should be set at 75,000ha. This is essential to achieve an ecologically coherent and resilient network that will enable nature's recovery, deliver nature-based solutions to climate change and help to tackle health inequalities. To ensure the goal of good quality habitat, criteria should be set for condition before newly created habitat can be included in the reporting on this target.

As the proposed target is a gross target it is possible that, by 2042, we may have lost more habitat than has been created or restored. This would be completely unacceptable given the nature and climate crises we are facing, and the target must be for net habitat gain. In addition, the Detailed Evidence Report suggests that habitat management and restoration, followed by protected site management, are the two most important actions required for the species targets. So, if we are to achieve the suite of biodiversity targets, there is a need for increased large-scale creation and restoration of wildlife-rich habitat.

Outcome 1b) of the England Biodiversity Strategy, published in 2011, was *“More, bigger and less fragmented areas for wildlife, with no net loss of priority habitat and an increase in the overall extent of priority habitat by at least 200,000ha”*⁶. There was also an aspiration for no net loss of any priority habitat type. Eleven years later and we are still being told by Defra that they *“do not yet have the tools to be able to record losses”*.

The proposed tree canopy and woodland cover target is net and the Detailed Evidence Report notes that *“Permanent woodland lost to development and open habitat restoration is published annually in the Forestry Commission Key Performance Indicator report and included in annual updates to woodland area reported in Forestry Statistics”*. This should be possible for all habitats given all the work that has been done on spatially mapping existing habitats and also through the Local Nature Recovery Strategy process.

The target needs to be outcome-based

We are also concerned that the proposed target is action-based rather than outcome based. Whilst it is important to measure and keep track of reported action, it is insufficient to enable a confident assessment of progress towards the target. **The wider habitats target must be for net habitat creation and/or restoration and it needs to be outcomes-based with the sufficient level of monitoring required.**

We recognise Defra’s aim for targets, in line with the 25 Year Environment Plan, to be outcome-based rather than action-based and that the Detailed Evidence Report suggests it is data limitations preventing an outcome-based target being set at this time. But, an action-based target for the wider habitats target is at odds with the proposed forestry target of *“increasing tree canopy and woodland cover from 14.5% to 17.5% of total land area in England by 2050”* which is a net target, based on a percentage of land rather than area, and it is outcome-based. In fact, the Detailed Evidence Report for the Woodland Cover target even explains why an action-based tree planting target was rejected saying *“The area of woodland / number of trees planted metric was rejected [from the woodland targets] as a) it is action based rather than outcome based and b) would not reflect net progress towards government’s existing woodland cover targets or government’s wider environmental ambitions”*.

We appreciate that, currently, *“there is no consistent or comprehensive approach to monitoring to enable a robust assessment of the current extent or condition of semi-natural habitat outside SSSIs”*. As a result, we would also urge Defra to prioritise the development and finalisation of Indicator D1 – quality, quantity and connectivity of habitats so that it can form the basis of a robust target in the near future.

Habitat restoration at sea

To achieve Good Environmental Status for our seas, we need to go beyond conserving the current, often degraded, state of our marine environment. As set out in the Environment Act, biodiversity must not only be conserved, but enhanced. This should include the restoration of vital habitats for our marine and coastal environments, such as saltmarsh and seagrass.

The need to avoid one habitat dominating the target

To secure nature’s recovery, we need to restore degraded habitats and create a range of habitats across the country. The Wildlife Trusts would be concerned if only one habitat type was to contribute a significant proportion of the target and, whilst we welcome the creation of significant areas of native woodland, we are concerned at the apparent focus on this. According to the Environmental Targets consultation document, to achieve the proposed tree canopy and wood cover target, requires the

⁶ Defra (2011) *Biodiversity 2020: A strategy for England’s wildlife and ecosystem services*
<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

equivalent of 420,000ha of woodland creation (allowing for some woodland loss). The end point for the two targets are different, the wider habitat is 2042 and that for woodland cover being 2050, but we would not be able to support a proposal whereby the vast majority of a habitat target was met through a single habitat. This would not be the answer to solving the nature or climate crisis.

In addition, the woodland cover target will include commercial forestry, whereas the generic wider habitats target in this consultation would include native woodland habitats only. So, assuming that only native woodland habitats will count towards the wider-habitat biodiversity target, then the Biodiversity Terrestrial and Freshwater Targets Detailed Evidence report⁷ states that *“a proposed tree canopy and woodland cover target expects to create around 145,000ha of native woodland by 2042”*. In comparison, the Woodland Cover Target Detailed Evidence report states *“the analysis assumes that up to 80% of the woodland planted will be native and, if the proposed target is realised, that would result in approximately 150,000 hectares of priority habitat being created outside of protected sites by 2042; this figure could be higher if conventional woodland creation (as opposed to agroforestry systems) makes a larger contribution than currently assumed”*. These statements are of concern for a couple of reasons:

- The figures for native woodland habitat contributing to the wider-habitat biodiversity target given in the two Detailed Evidence reports differ – one being 145,000ha and the other stating 150,000ha.
- The Woodland Target report suggests that if more native woodland was created, the figure contributing to the biodiversity target might be even greater. Again, this would be a very high proportion of the total target area and could be at the detriment of other wildlife-rich habitats. It is essential that a range of wildlife-rich habitats are created or restored for the wider-habitats biodiversity target.

We appreciate that the proposed target is for a *“range of wildlife-rich habitats”* to be created or restored and Annex 1 of the Biodiversity and Freshwater Targets Detailed Evidence Report does acknowledge that *“no single habitat group should dominate in a way that is detrimental to the delivery of other habitats”*. However, there is no information in either the consultation document or the Detailed Evidence Report that provides any detail on how that will be achieved. The Wildlife Trusts suggest that through the Local Nature Recovery Strategy process, spatial targeting of habitat creation would ensure a range of habitats are created and restored (see below).

A framework for approaching the breakdown by habitat has been produced in the past. Outcome 1b of the England Biodiversity Strategy (2011) was *“More, bigger and less fragmented areas for wildlife, with no net loss of priority habitat and an increase in the overall extent of priority habitat by at least 200,000ha”*⁸. The Terrestrial Biodiversity Group, chaired by Natural England, was responsible for drafting, developing, delivering, and reporting on actions in the England Biodiversity Strategy. A Task and Finish Group was established to consider the purpose, scope, definitions, and assessment of each outcome and to provide greater clarity. For Outcome 1b, the Task and Finish Group noted that expansion and restoration can take many years to complete. They suggested that areas should be recorded as contributing to the objective as soon as the management action has been carried out or initiated, although that should be caveated as ‘under expansion’ or ‘under restoration’ until a minimum threshold was reached. In order to avoid the entire 200,000ha outcome being delivered through one

⁷ https://consult.defra.gov.uk/natural-environment-policy/consultation-on-environmental-targets/supporting_documents/Biodiversity%20terrestrial%20and%20freshwater%20targets%20Detailed%20evidence%20report.pdf

⁸ Defra (2011) *Biodiversity 2020: A strategy for England’s wildlife and ecosystem services* <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

habitat type, the Task and Finish Group also developed a prioritisation framework which was then used to provide an indicative habitat-by-habitat breakdown of the 200,000ha objective. There was also an aspiration for no net loss of any priority habitat type. A similar approach to that taken for Outcome 1b could be taken for the legally-binding wider-habitat target.

Habitat condition

The wider habitat target makes no mention of whether the newly created habitat should reach a certain condition to be included, nor whether or how the condition of the restored and created habitat should be maintained. It is imperative that good quality habitat is created and then maintained if we are to meet the suite of biodiversity targets.

We know that in the short-term, Defra will be focusing on the target to halt the decline in species abundance. However, achieving that target will require having more wildlife-rich habitat that is good quality, well connected, effectively managed and regularly monitored.

Spatially targeting habitat creation and restoration

The Wildlife Trusts believe that the wider-habitat target should be to create or restore in excess of 750,000ha by 2042. One way to target habitat creation and restoration and to ensure that a range of habitats are delivered outside of protected sites is through the Local Nature Recovery Strategy process. Through the Local Nature Recovery Strategy process, we need to consider what action is needed but also where it is needed and at what scale. This will help ensure a spread of habitat types appropriate to the existing resource and deliver the greatest benefits for both species and habitat recovery. Spatial reporting should also enable consideration and analysis of where habitat has been lost.

For nature to recover, we need Local Nature Recovery Strategies to identify, map and plan where good wildlife habitat is already, where it could be and how it will be protected, restored, created and joined together to achieve recovery. The biodiversity priorities identified and the maps produced should be used for planning decisions and to target investment. Local Nature Recovery Strategies will also be key to delivering nature-based solutions, for supporting climate change mitigation and adaptation and for helping tackle health inequalities.

Target proposals for biodiversity in the sea

Marine Protected Areas

Government has proposed:

- 70% of the designated features in the MPA network to be in favourable condition by 2042, with the remainder in recovering condition, and additional reporting on changes in individual feature condition.

We agree the proposed targets provide the high level of ambition needed to improve and restore the MPA network to favourable condition. However, **there is an urgent need to prioritise the activities which take place in the sea to achieve recovery of MPAs**. This is particularly important given the ambitious offshore wind farm targets that have been set in order to meet net zero by 2050. Offshore wind farm development and associated infrastructure, such as energy cables, must be placed in the right locations to avoid further decline to MPAs. To ensure sustainable development in our MPAs we recommend the following:

- Strengthened mitigation hierarchy: the first principle of the mitigation hierarchy – avoidance – is rarely implemented. Government must make it clear to industry that there is a presumption against development in MPAs (SPAs, SACs and MCZs) to allow recovery.
- Alternatives to avoid damage to MPAs: Where infrastructure cannot avoid MPAs, alternative approaches must be implemented that reduce damage to MPAs to allow recovery. For example, we propose the development of cable corridors for energy cables where anchoring and demersal fishing is excluded. This would mean that cable protection would not be required, which currently leads to a decline in MPA condition as a result of inadequate compensation. Cable corridors would ensure a secure route to shore for renewable energy and allow recovery of MPAs.

The methodology used for this target seems sensible, however, it is not very clear from the evidence pack provided exactly which designated features within which MPAs will be included in this target. This is especially so where the designated feature may bridge the terrestrial and marine environments (e.g. seabirds).

Target proposals to improve water quality and availability

The Wildlife Trusts do not believe that, alone, the four water targets currently proposed will be sufficient to drive the recovery of the water environment.

Whilst the proposed targets will drive action on key pressures facing our waters, they do not represent the holistic approach that is required to drive positive change in this highly complex and interdependent area of delivery. For example, they exclude action on other significant pressures such as chemical pollution and urban runoff and, by focussing on sectoral approaches, could undermine a current shift towards multi-sector collaborative delivery. These shortcomings also threaten the ability of the water environment to play a role in supporting delivery of other Environment Act targets, with the Environmental Audit Committee noting in the foremost conclusion from their ‘Water Quality in Rivers’ Inquiry that *“Improving the quality of the water in rivers in England should be considered a principal objective through which the Government and public bodies can deliver on the legally binding duty, established in the Environment Act 2021, to halt the decline in domestic species by 2030.”*

The approach currently taken under the Water Environment Regulations 2017 and through River Basin Management Plans (RBMPs) provides such a foundation, which could be built upon. However, the requirement under RBMPs to achieve all cost-beneficial actions to improve status by 2027 means that beyond that date there will be no overall target for the quality of freshwater / aquatic habitats. Outside of protected sites, there will be no requirement to further enhance the rivers, lakes, estuaries and coastal waters that have achieved ‘good status’ (- simply a requirement to not let them decline), and nothing to drive improvements in the quarter of waters for which it is not currently considered cost-beneficial to achieve good status. There will be no focus on the parts of the water environment not subject to RBMP requirements, including smaller lakes, headwaters and wetlands, and no focus on aspects crucial to a healthy, functioning water environment but not currently prioritised within RBMPs, such as connectivity and natural function. It is difficult to see how the water targets as proposed will ensure that healthy aquatic habitats support the delivery of the 2030 apex target on halting species decline.

As such, we recommend that Government considers an apex target for water. This will provide an umbrella for the currently-proposed targets, and give regulators, industry, deliverers and the public certainty about direction of travel and extent of ambition.

Central to such a target should be the ambition to restore the natural function of catchments. This would create a focus on achieving natural water quality to support ecology (in part driven by the proposed targets), as well restoring natural form - supporting habitat quality and natural flow regimes by tackling physical modifications (a major 'Reason for Not Achieving Good Status', RfNAGS, not adequately tackled under current RBMPs). Such an approach would deliver wider benefits, e.g. barrier removal for migratory fish, floodplain connectivity for flood management; and would ensure less pollution and run-off reaching the coasts and entering our seas. Naturalness components (potential sub-metrics) could include the area of clean water habitat (defined by high status chemistry & biochemistry), the length of watercourse with a functional floodplain, and the length of watercourse with high status biology, and should draw from the parameters included in indicator B6 currently under development as part of the indicator framework for the 25 Year Environment Plan, which considers elements of hydrological, physical, chemical and biological naturalness. A holistic assessment could also build in measures that reflect societal benefits as well as direct ecological gains, such as the health and wellbeing value of waters, better reflecting society's aspirations for the water environment.

Abandoned metal mines

Government has proposed to:

- Reduce the length of rivers and estuaries polluted by target substances (cadmium, nickel, lead, copper, zinc, arsenic) from abandoned mines by 50% by 2037.

Although mine pollution makes up [less than 3% of recorded RfNAGS](#) against River Basin Management Plan objectives, where abandoned metal mines are present, their impact is significant. Rivers in the north west, north east and south west are impacted by heavy metal pollution for which prior operators cannot be held responsible. We therefore welcome this target as it will drive action on an issue that has previously received limited attention.

However, as a target representing the priorities within the Chemicals Strategy (currently in development), it represents a very limited subset of the issues around chemical pollution that need to be considered to protect the water environment. As such, a target aiming to tackle only half of an issue which is itself only a small component of the whole, seems inadequate. The Water Framework Directive (England and Wales) Regulations 2017 set out that Good Status should be achieved for all waters where it is cost beneficial to do so, by 2027; as the evidence pack confirms that delivery of the proposed target has been assessed to be cost-beneficial, it is unclear how a target for 2037 does not simply duplicate, (or worse – weaken, by virtue of extending the timescales), an existing statutory obligation. . We therefore suggest that **the Environment Act target should build upon the baseline of what will be achieved under RBMP obligations, by securing improvements across a significant proportion of the remainder of affected sites by 2037, i.e. by setting a target greater than 50%.**

The proposed target aims to deliver improvements for those sites where it is most technically feasible; for example, for larger 'point source' inputs which can be more easily gathered and treated. Yet the evidence pack shows that a range of levels of ambition were considered. It explains that a 60% reduction would also be potentially achievable, whilst a 75% reduction is considered 'unachievable in practice at present'. We suggest that although moving towards a target of higher ambition will require action at more difficult-to-tackle sites, including large numbers of smaller inputs which effectively act as diffuse sources, learning from the pre-2027 actions required in line with RBMP objectives should provide the

opportunity to test approaches, including nature-based solutions, that could be more widely rolled out to other sites post-2027. In this way, a higher target will facilitate action on sites which are currently considered not to be cost-beneficial, by taking learning over the next 5 years and applying it to further sites in the latter decade of the target period. **We propose that the target scenario of 75% is adopted**, since:

- The 60% target is considered achievable – although it would require additional funding from Government, it is based upon the building and operation of approximately 50 mine water treatment schemes, and so relies on known approaches, with funding and capacity being the limiting factors.
- The 75% target was not costed because ‘it was not considered feasible to accelerate the programme’ to achieve even the 60% target. This suggests that capacity, rather than technical infeasibility, is limiting ambition. Therefore, the learning from schemes set to be delivered under RBMPs pre-2027 (i.e. in the absence of any target), plus additional schemes regarded as achievable under lower-ambition scenarios, should be used to support delivery in this higher-ambition scenario. A growing body of transferable knowledge will likely allow techniques to be used in situations more widely than currently envisaged, will reduce costs as we become more proficient at building and managing such schemes, and will likely reduce costs *upon Government* as we become more equipped at demonstrating benefits and drawing in funding from non-government sources to match-fund delivery.
- In particular, cost-benefit for this target was based on the National Water Environment Benefits Survey NWEBS; work is underway to expand the range of benefits that the survey can account for, meaning that schemes are likely to become more financially viable - and therefore more deliverable - as benefits increasingly outweigh costs, and as the greater range of benefits that can be recognised attracts financial contributions from wider beneficiaries.
- The Water Expert Advisory Group (WEAG) warned that ecological benefits may be impacted by lag times (including through desorption of metalloids from sediments as water-column concentrations decrease) and as climatic conditions may impact chemical or biological responses; as such a 50% reduction target in impacted river length may not translate to ecological improvements in 50% of affected rivers, meaning that a more ambitious target may be required to deliver even the envisaged ecological gains.

Nutrient pollution

Government has proposed to:

- Reduce nitrogen, phosphorus and sediment contribution from agriculture in the water environment by at least 40% by 2037 against a 2018 baseline.

We welcome the existence of a target focussed on reducing the pressures caused by agriculture, given that it is now the sector responsible for the greatest number of RfNAGS. We welcome the inclusion of sediment, noting that (unlike for nitrogen and phosphorus, which *could* be tackled simply by limiting inputs, with no wider benefits) actions to reduce sediment input will necessarily deliver benefits for soil management, achieving knock-on reductions in losses to water of agri-chemicals including pesticides, and of contaminants in sewage sludge, due to reduced run-off, as well as increased business efficiency and resilience due to soil conservation.

However, the evidence pack identifies that a 50% target would bring us “*closer to achieving good ecological outcomes in many waterways*”. We want to see a target which is informed by environmental need and is aimed at achieving, and in some locations going beyond, Good Ecological Status. This target falls short in relation to phosphate since the Phosphorus pressure narrative that informed the Challenges & Choices consultation identified that reductions in agricultural P losses of up to 50% may be required to

achieve good ecological status. The nutrient pollution targets for agriculture and wastewater therefore need to be set at such a level that they collectively make the required contributions towards achieving and exceeding WFD standards in affected waterbodies. For nitrogen and sediment, which unlike phosphate come primarily from agriculture, higher percentages should be considered for this target according to ecological need.

Regardless of whether or not a higher percentage reduction is ultimately set, targeting by catchment is proposed, and will help to strengthen the target; this should be need-driven - i.e. responding to environmental limits. As the target is an average, this should allow for delivery to be spatially prioritised such that above-average reductions are delivered in the locations that will enable the greatest number of waterbodies overall to achieve good ecological status. This would likely mean that percentage reductions for the three pressures need to be delivered in a non-uniform way; for example, to achieve good status in a given waterbody may require a 20% reduction in phosphate, but a 60% reduction in sediment; such an approach would mean that contributions to the overall 40% target could be delivered in a way which is most ecologically meaningful, without requiring 'blanket' reductions everywhere which may burden farmers unnecessarily in some locations, and see reductions fall short of ecological needs in others . . Targeting by catchment will also offer the opportunity to prioritise actions that benefit designated sites currently in unfavourable condition due to nutrient loadings. The Government has been clear on the need to address the sources of pollution impacting such sites in order to create headroom to allow development to go ahead where it is currently prevented. Nutrient neutrality approaches operating in these areas are recognised as being only an interim solution, as these simply offset potential 'new' damage and do nothing to tackle existing pressures to contribute to a waterbody's recovery. This target could go some way towards doing just that, provided that delivery is appropriately targeted.

We therefore welcome the wider benefits that this target could bring, such as in reducing sedimentation of river gravels which impacts fish reproduction, in improving the nutrient status of designated sites, and in reducing loadings to marine and coastal habitats downstream, but do not believe, in light of these pressures and the significance of agricultural pollution as a RfNAGS, that the targets proposed are ambitious enough. The targets must be based on environmental need, rather than the ease with which they can be delivered, and current limitations around monitoring, compliance with regulations and enforcement should not be used as an argument for setting weaker targets which will fail to see our waters adequately recover. For example, the evidence pack notes that achieving the target will require very high uptake of regulatory measures (in excess of 85%, with 100% modelled); this does not seem to be an unreasonable expectation to place upon the sector as society *expect* business to be compliant with regulation, although achieving this will require resourcing for advice and enforcement. In addition, achieving the target will require around 20% of agricultural land to be converted to semi-natural habitat. EA analysis suggests that if this is achieved for the highest risk areas, greater pollutant load reductions than 40% could potentially be achieved; this would bring us significantly closer to achieving or surpassing the kinds of reductions needed to bring waters into good ecological condition. To facilitate this will require that funding offers within ELMS are sufficiently attractive, and will also require that agricultural activity is not simply displaced to other areas, delivering increases in pollution there as a result.

Nutrient pollution from wastewater

Government has proposed to:

- Reduce phosphorus loadings from treated wastewater by 80% by 2037 (against a 2020 baseline).

We welcome a target which will see action to reduce phosphorus loadings to water from treated wastewater, which is currently responsible for up to 80% of phosphorus entering rivers nationally. **The target misses the opportunity to also tackle other key components of wastewater pollution including**

nitrogen, emerging chemical pollutants, and anti-microbial resistance, although the methods that will be utilised to tackle phosphate pollution may deliver improvements on some of these pressures at the same time. In particular, nature-based and catchment solutions which have the scope to do this should be favoured. Whilst the target provides the flexibility for companies to adopt such solutions, it does nothing to specifically encourage them. Within other areas of water company activity, such as delivery of the Water Industry National Environment Programme, the need for certainty of outcomes has sometimes dissuaded companies from proposing nature-based solutions, regulators from accepting them, or both; the long-term nature of this target should provide ample opportunity to identify, develop and implement nature-based solutions in the earlier years of the target window, and Government guidance should encourage this, in the knowledge that additional or alternative methods can be implemented later if the NbS do not perform as hoped.

The target also excludes untreated wastewater entering watercourses from Storm Overflows; it will be important to ensure that targets proposed as part of the Storm Overflows Reduction Plan recently consulted on are not overshadowed by the Environment Act targets, as this will significantly alienate environmental stakeholders. Indeed, catchment and nature-based solutions which work to keep water out of the sewerage system can contribute to the delivery of both sets of targets in tandem.

In terms of ambition, the evidence pack confirms that the proposed target goes beyond the reductions needed to achieve Water Environment regulations requirements. This is of course welcome and will build from the foundations of delivery under the third round of RBMPs where this level of improvement will be achieved by 2027 for all waters where it is cost-effective to do so. The WEAG noted that technical feasibility would allow for an even more ambitious target, and we believe there is merit in this being considered to secure improvements in the water environment that in some locations go *beyond* Water Environment Regulations requirements – this would be valuable particularly as it is unclear whether, overall or in specific locations, the greater ambition set for phosphate from wastewater is offset by the lesser ambition set for agriculture. We would expect each sector to be responsible for the costs of achieving legal compliance as a minimum, and only where this is achieved would we consider that further delivery through whichever sector is best able to achieve it is an appropriate delivery route, in line with the Environment Agency's revised 'Fair Share' approach. The water industry's Price Review process means that the cost of investment in wastewater treatment works or catchment solutions will be borne by customers, yet this is only acceptable if both the water industry and the agricultural sector have each met their legal obligations first. Beyond legal compliance, it is then appropriate that water industry investment is used as a delivery route, enabling societal investment in improving the state of the water environment - although the same could equally be said of ELMS for agriculture which is also a means of channelling taxpayer funds to environmental delivery. We therefore question whether the balance between these two targets is right, not because of the source of the funds (which in each case is society) but because there would be a range of additional benefits (such as for biodiversity and climate) which would be more likely to be delivered through the agriculture route than through the water industry route; the greater ambition of the wastewater target compared to the agriculture target could mean that such additional benefits are not delivered, if catchment solutions are not adequately facilitated.

Further, the WEAG made comments about the level of ambition and the potential omissions in both the agriculture and wastewater targets; it will therefore be important to consider these two targets side by side to ensure that, whether taken forward as proposed, or strengthened, the package of benefits delivered *as a whole* is maximised.

Water demand

Government has proposed to:

- Reduce the use of public water supply in England per head of population by 20% by 2037.

We strongly welcome the inclusion of a water demand target; there is significant public and political focus on water pollution but it must be recognised that water quantity is as important as, if not more important than, water quality. Excess abstraction is a long-term threat to our environment as well as to our economy and lifestyle, and significant action must be taken now if we are to avoid the now-famous ‘Jaws of Death’ spoken about by Sir James Bevan; the point at which the demand for water in this country will outstrip supply. The Water Resources National Framework has set out a clear view on the degree of action needed to avoid this, and it is imperative that at a minimum we heed its recommendations. As such, we welcome a target on Distribution Input as opposed to one which would focus only on a component of water demand, such as leakage or *Per Capita* Consumption (PCC). This target allows companies to utilise whichever means of reducing demand for water is the most effective for their circumstances and their customers: leakage, water efficiency, business use, process losses and so on. However, we have two main concerns about the ambition of this target:

- Firstly, we question whether a blanket 20% reduction will deliver the environmental protections and improvements needed. The evidence pack confirms that a 20% reduction is in line with meeting the goals of the National Water Resources Framework, yet this does not mean that reductions will be delivered where need is greatest. Reducing demand across the board or in an untargeted way is unlikely to deliver the same benefits as a target which saw abstraction reduced from the most over-abstracted waters including, in particular, many of England’s chalkstreams. Sufficient scrutiny by the Environment Agency of Regional Water Resources Plans and company-level Water Resources Management Plans will be needed to ensure that proposed abstraction reductions are being targeted in order to deliver the greatest environmental benefits.
- Secondly, it is clear that a Distribution Input target per head of population (DI/pop) leaves the environment bearing the risk of population increases. An absolute DI target would be more environmentally protective, securing a specified decrease in the volume of water abstracted from the environment. In contrast, a 20% reduction in DI over population would by definition deliver different abstraction reduction volumes at different levels of population – the benefit to the environment is not fixed – and at higher levels of population increase any water saving per head is more than offset by growth in population, meaning that actual abstraction from the environment could *increase* relative to present-day levels, despite the 20% reduction target being met in name. Waterwise estimate that this would occur at population increases of around 25%.

According to the evidence pack, total public water supply abstraction in the baseline year was 13,730MI/d and achieving the proposed target (20% reduction in DI/pop) would deliver a reduction in abstraction to 12,556MI/d by the target date – this is a reduction of only ~8.5% in absolute terms, which serves to illustrate the difference between a figure that does, and does not, include consideration of population.

Defra have proposed DI/pop as the metric as this indicates the level of water use per person in England; we would argue that the purpose of a target under the Environment Act is not to gauge water use per person, but to ensure that enough water is left in the environment for it to thrive. DI/pop should be tracked as a useful measure to understand and communicate progress towards target delivery, but DI (absolute) should be the metric upon which the target is based in order to ensure a reduction in damage to the environment. This more certain measure is necessary because, as the WEAG identified, the proposed target reflects, but does not exceed, current ambitions set out in the Water Resources National Framework. This removes the driver for Government to bring forward regulation or policies that would

support greater ambition, such as on building regulations, yet these may be needed to drive greater change, as all three elements of demand management - household water efficiency, non-household water efficiency and leakage - are currently not on track to meet the Framework's ambition.

A more ambitious target was rejected because the compulsory water metering which would be required to deliver higher water savings 'may result in unmetered family homes facing unexpected large increases in bills'. This is an impact which can be effectively managed by water companies through a combination of water efficiency advice, support, tariffs and, finally, financial support to struggling customers, and is the fairest way for water users across the country to pay for their water use; it is not in itself a reason to reject action, and represents a huge, missed opportunity in embedding sustainable water use for the long term. Water efficiency measures had the highest cost-benefit ratio of climate change adaptation measures considered in the 3rd UK Climate Change Risk Assessment.

In the absence of changes to the target that deal with the above concerns, then a higher percentage level of ambition is recommended that will compensate for these limitations. In this regard we agree with the WEAG that the target should be set at a level which goes beyond the ambition of current plans and policies and in particular reflects the scope for greater reduction in PCC now feasible due to additional Government policies currently in train (such as the mandatory water efficiency label committed to in a written statement to Parliament) – we recommend a target of between 22% and 25% depending upon feasibility and impact assessment, based upon greater levels of ambition within the PCC, non-household and leakage components as discussed by the WEAG, and in particular incorporating an ambition of bringing PCC below 100 lppd by 2050 linked to policy change.

Target proposals for woodland cover

Woodland target

Government has proposed to:

- Increase tree canopy and woodland cover from 14.5% to 17.5% of total land area in England by 2050.

The Wildlife Trusts broadly welcome the woodland cover target to increase tree canopy and woodland cover to 17.5%. A percentage target is welcome and we are pleased that the target is not for a set numbers of trees. The latter would be problematic in that it may drive high density planting and/or a lack of post-planting maintenance. A percentage cover-based target also allows for natural regeneration of woodland to be included which The Wildlife Trusts strongly support.

Another positive of a percentage target is that, by its very nature, it is a net target and outcome-focused. In comparison, the proposed wider habitat target within the suite of biodiversity targets to restore or create 500,000ha of wildlife-rich habitat is not only a gross figure (so by 2042, we may have lost more habitat than has been created or restored) but it is also an action-based target.

The proposed target suggests we are currently at 14.5% tree canopy and woodland cover. However, most reporting suggests that England is at 10% woodland cover⁹. Having reviewed the evidence pack, we now know that the 14.5% figure builds on what is usually reported to also include tree cover of small woods, groups of trees, linear features and individual trees. However, the estimate used in the

⁹ <https://www.forestresearch.gov.uk/tools-and-resources/statistics/statistics-by-topic/woodland-statistics/>

Woodland Cover Target Detailed Evidence Report¹⁰ is based on tree cover outside woodland data published in 2017¹¹. We welcome the acknowledgement in the Detailed Evidence report that an update to the Tree Cover Outside Woodland is expected in 2022. If, following the update, it is found that the amount of tree cover outside woodland is greater than in 2017 (and means a higher baseline than 14.5%), the target should be revised upwards by a corresponding amount. If the tree canopy and woodland cover is found to be lower than the current estimate of 14.5%, the target of 17.5% by 2050 should remain.

As a general comment on the woodland target, there is no consideration of condition or quality of the habitat. Lack of appropriate management is an important cause of the decline and loss of woodland and it is estimated that just 7% of our native woods are in good condition for nature¹². There also needs to be commitment to improve woodland management and to ensure good condition is maintained.

We would also like further clarity on how any increase in tree planting contributes to the wider habitat target within the suite of biodiversity targets. The Wildlife Trusts would be concerned if one habitat type was to contribute a significant proportion of the target. To secure nature's recovery, we need to restore degraded habitat and create a range of connected habitats across the country. According to the Environmental Targets consultation document, to achieve the proposed tree canopy and wood cover target, requires the equivalent of 420,000ha of woodland creation (allowing for some woodland loss). The end point for the two targets are different, the wider wildlife-rich habitat being 2042 and that for woodland cover being 2050, but we would not be able to support a proposal whereby the vast majority of a habitat target was met through a single habitat. This would not be the answer to solving the nature or climate crises.

In addition (as discussed in relation to the wider habitats target), the woodland cover target will include commercial forestry, whereas the generic habitat target in this consultation would include native woodland habitats only. So, assuming that only native woodland habitats will count towards the wider-habitat biodiversity target, then the Biodiversity Terrestrial and Freshwater Targets Detailed Evidence report¹³ states that *"a proposed tree canopy and woodland cover target expects to create around 145,000ha of native woodland by 2042"*. In comparison, the Woodland Cover Target Detailed Evidence report states *"the analysis assumes that up to 80% of the woodland planted will be native and, if the proposed target is realised, that would result in approximately 150,000 hectares of priority habitat being created outside of protected sites by 2042; this figure could be higher if conventional woodland creation (as opposed to agroforestry systems) makes a larger contribution that currently assumed"*. These statements are of concern for a couple of reasons:

- The figures for native woodland habitat contributing to the wider-habitat biodiversity target given in the two Detailed Evidence reports differ – one being 145,000ha and the other stating 150,000ha.
- The Woodland Target report suggests that if more native woodland was created, the figure contributing to the biodiversity target might be even greater. Again, this would be a very high proportion of the total target area and could be to the detriment of other wildlife-rich habitats. It

¹⁰ https://consult.defra.gov.uk/natural-environment-policy/consultation-on-environmental-targets/supporting_documents/Woodland%20cover%20targets%20%20Detailed%20evidence%20report.pdf

¹¹ https://cdn.forestresearch.gov.uk/2022/02/fr_tree_cover_outside_woodland_in_gb_summary_report_2017.pdf

¹² Woodland Trust (2021) State of UK's woods and trees <https://www.woodlandtrust.org.uk/state-of-uk-woods-and-trees/>

¹³ https://consult.defra.gov.uk/natural-environment-policy/consultation-on-environmental-targets/supporting_documents/Biodiversity%20terrestrial%20and%20freshwater%20targets%20%20Detailed%20evidence%20report.pdf

is essential that a range of wildlife-rich habitats are created or restored for the wider-habitats biodiversity target.

A framework for approaching the breakdown by habitat has been produced in the past. Outcome 1b of the England Biodiversity Strategy (2011) was “*More, bigger and less fragmented areas for wildlife, with no net loss of priority habitat and an increase in the overall extent of priority habitat by at least 200,000ha*”¹⁴. The Terrestrial Biodiversity Group, chaired by Natural England, was responsible for drafting, developing, delivering, and reporting on actions in the England Biodiversity Strategy. A Task and Finish Group was established to consider the purpose, scope, definitions, and assessment of each outcome and to provide greater clarity. For Outcome 1b, the Task and Finish Group noted that expansion and restoration can take many years to complete. They suggested that areas should be recorded as contributing to the objective as soon as the management action has been carried out or initiated, although that should be caveated as ‘under expansion’ or ‘under restoration’ until a minimum threshold was reached. In order to avoid the entire 200,000ha outcome being delivered through one habitat type, the Task and Finish Group also developed a prioritisation framework which was then used to provide an indicative habitat-by-habitat breakdown of the 200,000ha objective. There was also an aspiration of no net loss of any priority habitat type. A similar approach to that taken for Outcome 1b could be taken for the legally-binding wider-habitat target.

Short rotation coppice and short rotation forestry plantations

The Wildlife Trusts agree with excluding short rotation coppice and short rotation forestry from the woodland cover target. However, should there be stands of short rotation coppice or short rotation forestry plantations that are UK Forestry Standard (UKFS) compliant, then these could be included. Given that UKFS is the reference standard for sustainable forest management and ensures that international agreements and conventions are applied in the UK, plantations that do not meet this Standard should not count towards the target. This would exclude some purpose-grown biomass plantations. Coppicing for nature conservation reasons as part of a management tool for woodland should not be excluded.

One of the given reasons for setting a woodland cover target is to contribute to the delivery of net zero by sequestering carbon dioxide and to support nature’s recovery and biodiversity. However, in order to deliver benefits against these two objectives, trees need to stay in the ground for a considerable amount of time.

We are concerned by the use of the term ‘initially’ in the target question. We appreciate that the Detailed Evidence report suggests this is so it can be revisited after the Biomass Strategy is published later in 2022 but we would not want us to be getting close to 2050 and be in danger of missing the target and, in a drive to meet it, short rotation coppice and short rotation forestry plantations suddenly included. The intention of the target is to deliver for nature and for net zero and changing the parameters of the target just to meet it, would not do that.

Inclusion of trees in woodlands, as well as trees in hedgerows, orchards, in fields and in towns and cities

The Wildlife Trusts agree with the proposed scope of trees and woods that would contribute to the target. Trees outside woods deliver an array of benefits to nature, the climate, and to people - especially those in urban areas.

¹⁴ Defra (2011) *Biodiversity 2020: A strategy for England’s wildlife and ecosystem services*
<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

We would also welcome safeguards being put in place to ensure a high proportion of woodland is native. At the moment, commercial forestry is also included and could make up the majority of the target which is a concern.

Level of ambition

The Wildlife Trusts agree with the proposed level of ambition for a tree and woodland cover target. Achieving the target would put England on course to meet the recommendation proposed by the Committee on Climate Change's 6th Carbon Budget for 18% woodland cover across the UK by 2050¹⁵.

The consultation document suggests that increasing tree and woodland cover from 14.5% to 17.5% is equivalent to 420,000ha. The Detailed Evidence Report gives a figure of 415,000ha and even that is "*allowing for some woodland loss*". But, in reality, even more hectareage will be required to accommodate trees lost to development, disease, wildfire and other lack of appropriate management. If woodland is truly to contribute to both the delivery of nature's recovery and net zero ambitions, it needs to be in good condition and priority habitat woodland needs to be protected. There needs to be a preference for native woodland – given the nature and climate benefits – and, as mentioned, there needs to be consideration or measure of habitat quality within the target(s). There should also be consideration for, and reference to, how protection for our irreplaceable assets can be ensured including through the upcoming planning reforms.

The Woodland Cover Target Detailed Evidence report states that "*analysis assumes that up to 80% of the woodland planted will be native*". We are interested in why this assumption is not greater given that the *Percentage of new planting of woodland in England that is broadleaved woodland* KPI shows that in 2020-2021, 95% of the woodland reported as newly planted in England was broadleaf and it has been over 85% for all but two years over the last two decades¹⁶.

Natural regeneration or colonisation isn't referred to in the consultation document but has been mentioned during Defra roundtables and presentations as within scope in the metric. The Wildlife Trusts welcome the inclusion of natural colonisation. But, Government needs to recognise that the time-bound nature of the targets shouldn't drive perverse outcomes for woodlands generated through natural regeneration. The timelines of these woodlands are varied and unpredictable – which is partly why they are great places for nature and support a range of species throughout the process of succession. Natural regeneration in 2035, for example, may not achieve widespread canopy cover until the 2060s and we wouldn't want this to mean Defra favours other types of woodland cover over natural regeneration in order to meet the target.

¹⁵ Climate Change Committee (2020) Sixth Carbon Budget <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

¹⁶ <https://www.gov.uk/government/statistics/forestry-commission-key-performance-indicators-report-for-2020-21>

The loss of nature

“Over the last 25 years nature has diminished across the UK year on year on year! The dawn chorus is quieter and less diverse than even 5 years ago; our waysides, hedgerows and agricultural landscapes have fewer wild flowers as Nitrogen pollution changes their ecology; Insect populations including bees, butterflies and moths have crashed; Bats, newts, swifts, hedgehogs and badgers are struggling in the face of new development and home improvements. Government should prioritise the recovery of nature because it’s our life support system, ecologically, agriculturally and emotionally.”

“...devastating amounts of biodiversity loss.”

“...we’ll have lost all that’s precious and irreplaceable thanks to man’s greed, stupidity and arrogance.”

“Don’t wait till it’s too late.”

“Species extinction and catastrophic climate change threaten all life on Earth.”

“Nature is not an optional extra. It is essential to the survival of the human race and the precious world we inhabit.”

“...without nature, there is no hope.”

Government’s role

“The Government must prioritise nature’s recovery for the sake of the UK’s future wealth and prosperity.”

“The natural world and people’s health and wellbeing should be drivers of current and future government policy.”

“We need the Government to take urgent & positive action to protect and improve spaces for Wildlife.”

“...you hold us all hostage to the outcomes of government in-action.”

“Reverse our disgraceful record. It shames us in the eyes of the world.”

“It is the government’s job to set the highest standards to protect the environment.”

Hope for our future

“...nature’s recovery is at the heart of building a sustainable future.”

“Prioritising nature’s recovery will bring benefits to the whole population; good production, soil improvement, natural pest control, improved wellbeing for the population.”

“It’s now time for the Government to prioritise nature’s recovery and support people and communities into the future.”

“The recovery of nature is fundamental to human health and our ability to continue to live and thrive on this planet.”

“At 79 years old, I can remember nature in abundance, when the dawn chorus was so loud it woke you. I would love my grandchildren to experience the same.”

For future generations

"I'm only 19 years old and already immersed in the crises affecting the natural world. I want to grow up on a planet that is flourishing, not have to struggle constantly because those in power can't make good on their promises. I'm currently studying wildlife & conservation management and learning how important our connection with nature is and how many opportunities there are for us to create a mutually beneficial relationship with it. The first step comes by putting pressure on those who make false promises because they know the fallout won't really affect them."

"I think they should [increase targets for recovery] because as they say "when it is gone it is gone" and young people will never see the things we do."

"Because we need more diversity in nature to keep our planet beautiful and thriving. I cannot bear the thought that the children who are young now will have fewer beautiful things to see than I had as a young child - many years ago."

"As a child the outside world was a treasure house. We were brought up to respect and care for the environment and the creatures in it. I am just entering my 90th year and my great grandchildren have not seen a hedgehog, frogs and toads, frogspawn and so many beautiful birds."

"...because the generation who will suffer most if we don't are too young to do what needs to be done. It is OUR responsibility."