

Shropshire Hills AONB Partnership response to 'An invitation to shape the Nature of England', Defra's Natural Environment White Paper discussion document, 22 Oct 2010.

The Shropshire Hills AONB Partnership welcomes this consultation and the Government's commitment to publish a White Paper on the Natural Environment. The consultation is wide-ranging, and the questions and commentary on the whole recognise the nature of the environmental challenges facing England. **However, in seeking to make savings in public sector spending, the government must not abandon environmental protection activities which are a proper function of the state, and whose loss would result in environmental degradation as well as a huge waste of previous investment and loss of capacity to address future challenges.**

This response has been considered by the 38 members of the AONB Partnership and our staff team of ten, and is informed by the experience of our work to conserve and enhance the Shropshire Hills AONB and promote sustainable development, especially through co-ordination and partnership approaches. 'Natural beauty' in our title should not detract attention from the substantive underpinnings of this, in terms of geology, biodiversity, culture, heritage and productive land use. The Partnership has, in addition to its environmental focus, a proven record in economic and social delivery, and is also the delivery body for the Sustainable Development Fund, and for LEADER in the Shropshire Hills, which is themed to enhancing people's wellbeing through links with the landscape and environment.

"the ability to adopt an environmentally-led approach to social and economic regeneration appears to us to be a great advantage. The North Pennines and the Shropshire Hills appear to have demonstrated convincingly that they are able to do that."

Pathfinder – Testing the Appropriateness of Designation - Report on AONBs for Countryside Council for Wales March 2009, Europarc Consulting

We have also provided input to the response of the National Association for AONBs to this consultation, and support that response as complementary to our own.

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

Decision making frameworks need to take greater account of the environment and of natural resources, enabling loss of 'natural capital' to be identified and taken into account, wherever this might be occurring as a consequence of a particular decision. **Environmental economy and valuation techniques** have been developing for many years now, but there is a need to embed them further. Defra's recent work on **valuing ecosystem services** and advice to other government departments is very valuable in this respect. Other methods such as **'triple bottom line accounting'** looking at environmental and social, as well as economic aspects are worthy of further application. Approaches such as **sustainability appraisal** are helpful in land use planning, but there are many other areas of decision making where such concepts are absent.

Taking a longer term view, the **deficit in environmental ‘literacy’ and understanding** needs tackling. The scale of environmental challenges facing us require a much higher level of understanding across the population and certainly among decision makers in key fields affecting the environment. Efforts are ongoing to address environmental issues in education, but there are other factors pushing the other way and many young people’s contact with the natural world is declining. In the policy sphere, environment is often mostly about waste, pollution, etc and **the value of biodiversity and the natural environment are seriously overlooked**. The recent work of The Economics of Ecosystems and Biodiversity project (TEEB) is a big step forward and needs disseminating widely.

In our work locally we try hard to show that both the **designation** of the Shropshire Hills as an AONB and **the environmental qualities** of the area which justify that, are indeed **assets rather than constraints**. While we have had some success with this, for many people a significant shift in thinking is required, and we see this being mirrored in relation to the broader environment at other scales.

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

a. If not, what should we focus on?

The challenges as defined are reasonable, but **do not give enough prominence to the loss of the natural resources on which our lives depend**. This may be best expressed as a first over-riding challenge:

- **Degradation of basic life processes (or ecosystem services) – including loss of natural habitats, food sources, biological diversity and soil, generation and movement of toxic chemicals, movement of alien species.**

This could be put along with the first two of the other challenges, much as described:

- Climate Change
- Increases in population and consumption – in relation especially to capacity ceilings on energy resources, freshwater, photosynthetic capacity.

Identifying over-arching challenges is useful, but they should not result in taking too narrow a focus.

“Most or all of these (key environmental problems identified) will become acute within the lifetime of young adults now alive. ... We have to solve them all.”

Jared Diamond, 2005

b. How should we approach these challenges?

The links back to these fundamental issues need constantly to be made, including their global dimension. England’s role in global issues can easily be represented as small, but a strong lead is necessary. Hard evidence of the trends and limits of these resource issues are needed, but experience shows that facts alone do not change people’s attitudes. **Local practical examples which illustrate the wider issues are needed. There is also a need to support and publicise examples of solutions.** In reporting and publicising positive steps, a balance is necessary between showing a positive side, but avoiding giving the impression sometimes observed that ‘everything is under control’, when in reality the steps are tiny in the face of massive issues.

The natural environment is not just, and should not be seen just as, a source of problems, but in fact **can provide us with many of the solutions we need**. For example declining reserves of oil

will mean that farming, for the most part currently totally oil-dependent, will have to rediscover natural systems for maintaining fertility.

The huge difference in levels of acceptance between scientists and the general population in relation to human-induced climate change indicate that **the media are exerting a strong braking influence on developing environmental awareness**. There is much good material on the environment, but a general pattern of consumer focus which tends the other way. There is also a journalistic tendency to seek sensation or 'balance' in an opposing view e.g. diminishing environmental issues, presented with little reference to the weight of scientific opinion. The government cannot control the media, but needs to try to **attach to the environment a sense of common purpose and responsibility**.

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?

It has become accepted that **regulatory methods** including site protection, systems for legal consent, etc. **are not adequate on their own** to protect natural assets. This does not mean however that such measures are not needed. Rather they **should be seen as a minimum**, alongside which voluntary and pro-active measures can add value. Continuing the recent trend **in improving the condition of SSSIs** through protection and incentives for positive management is very important, and will require continued commitment of public resources.

The move in biodiversity and conservation towards **working at a large scale across the landscape, and strengthening ecological networks**, is an essential component of future approaches, and though in its relatively early stages, needs to be supported and developed.

Areas of Outstanding Natural Beauty (AONBs) such as our own provide an example of integration and local delivery. The activity of AONB Partnerships covers a range of topics such as biodiversity, heritage, farming, transport and tourism, and brings together the public, private and voluntary sectors. **The Partnerships are cost effective, good at securing external funding, inclusive and well supported in their governance, and operate very effectively at a local level**. A particular example from our area is our Rivers Project, where additional **targeted project work** has significantly helped to make a difference. Despite designations and targeting of national schemes including agri-environment and Catchment Sensitive Farming, the condition of one of our European Special Areas of Conservation has been continuing to decline. The future of the freshwater pearl mussel in the River Clun is not yet assured, but our involvement has helped improve habitat quality along much of the river, and has engendered an interest among landowners and communities to take further action themselves.

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

The experience of managing and protecting the environment over several decades is generally that **efforts have not been enough**, and failure is usually not because the actions were ill conceived or poorly targeted. **County Wildlife Sites** are an example, where a system exists and sites have been identified, but **needs statutory protection and resourcing**. The ecological value of this important network of sites will continue to decline unless protection and capacity to pursue improved management is put in place.

Sadly in our area as elsewhere we see decline of key species such as breeding waders and ground nesting birds, and many invertebrates, largely as a result of habitat loss and fragmentation. **Agri-environment schemes** are a key delivery mechanism for the natural environment, and to deliver the best environmental outcomes, steps need to be taken to ensure

that the **best options are taken up to meet local environmental priorities**. The Entry Level Scheme arguably spreads money too thinly, for limited environmental benefits. The added value it provides over and above cross compliance requirements needs to be carefully evaluated. The Environmentally Sensitive Areas in our area have had very good levels of uptake and have successfully engaged many farmers with conservation work. There is a widespread feeling however that while they have delivered well on landscape objectives, their contribution to biodiversity has been more limited. **Continued funding for the Higher Level Scheme** is vital up to and beyond the current Rural Development Programme period to 2013. Many agreements in the Environmentally Sensitive Area scheme within our AONB expire in 2013, and succession of many of these through to HLS will be required to avoid a loss of conservation activity. **Targeting of HLS**, both geographically and in terms of options, will optimise the effectiveness of investments made. The combination of appropriate options in agri-environment schemes on neighbouring holdings is a key means of delivering landscape-scale action. The Higher Level Scheme and English Woodland Grant Scheme are **perceived by many farmers and landowners to be bureaucratic**. As these schemes are updated, finding the right balance between consistency, value for money and local flexibility will continue to be important.

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

The recent report of the **Lawton Review - 'Making Space for Nature'** makes many sound recommendations for securing a coherent and resilient ecological network in England, and these should be actively taken up by the government. The combination of a suite of well managed designated sites, along with mechanisms to support broader habitat networks and functioning ecosystems in the wider countryside will be key to managing our natural systems at the necessary landscape scale.

It will be important amidst the various streamlining going on, to retain an **evidence-based, 'Plan-led' approach**. If our knowledge of the natural environment and the strategic priorities needed to protect and nurture it do not have real prominence in decision making processes, the results will have very negative consequences. **AONB Management Plans provide an effective integrating mechanism** at an area-based scale for co-ordinating action and influencing decision-making.

Local partnership approaches, linking national or international importance to community involvement, such as AONBs and Biodiversity Partnerships, should continue to be supported.

The White Paper needs to make reference to **geology, geodiversity and earth science resources** (not noticeable in the consultation document). These provide valuable primary raw materials as well as forming the foundation of our landscape.

a. How should we define success?

Success needs to look at **environmental outcomes, but link these to the economic and social influences on the environment**. Identifying key qualities and indicators is a valuable approach, and Defra's recent work on indicators of sustainability has been useful. Partnership members have also drawn attention to the value of Defra's work on Environmental Accounts for Agriculture and the Farmland Birds Index.

Across government, there is a need to **move away from GDP as the main indicator of success**. The New Economics Foundation work on a 'Happy Planet Index' provides some good future directions for a broader assessment.

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

It should be possible to build common goals by working harder at **linking the environmental underpinning of quality of life and economic prosperity**. Truly it is time to manage the environment 'as if our lives depended on it'. **Integration of the environment into all aspects of government will remain a key challenge for Defra**. The Spending Review announcements reveal that the natural environment is apparently a low priority for the Government, and the disproportionate cuts to Defra mean that some of its valuable work may be lost.

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

It is important that the document recognises this international dimension, as **it is only at this scale that many environmental problems can be understood or addressed fully**. For example, the UK's domestic CO2 emissions may be falling, but when emissions overseas associated with consumption in the UK are included, the trend is rising. We need not to export problems, or to pretend that own service-dominated economy is clean while relying on dirty primary industry in other countries.

Resource footprinting work shows that to address global issues, relatively wealthy countries such as ours will have to **reduce consumption and shift to more sustainable lifestyles**. Use of **local food and products** has benefits to local economies and community resilience as well as environmental benefits and justifies further government support and incentives.

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?

The **model of AONB management** has much to commend it, consisting of three main elements – an agreed **strategy** for the area (the statutory AONB Management Plan), a **forum** of relevant stakeholders (the AONB Partnership), and some dedicated **staff time**. **National core funding for the Partnerships enables substantial amounts of other external funding to be secured**. In the current Financial Year £236,000 of Natural England funding has helped us to build a gross activity budget of around £750,000 (excluding match funding attracted against grants we have awarded to others).

Approaches which **involve local communities** should be given prominence, as winning hearts and minds is crucial to the long term protection of the environment. From our experience, the following examples have proved very effective:

- **Sustainable Development Fund**, as operated in AONBs and National Parks. A 'light touch' and flexible grant scheme open to community groups, businesses and individuals. In our area, many small projects have through this funding gone on to higher levels, accessing other larger scale funding or becoming established organisations.
- **LEADER** is a good way of supporting community action and linking the environment with other aspects of rural development. Local communities can achieve so much more when supported with advice and modest amounts of funding.

We are encouraging on the River Clun in the Shropshire Hills AONB the early stages of a relatively new '**community catchment**' approach. Led by farmers and other members of the community, this seeks to look in a holistic way at the factors affecting water and habitat quality of the river, from land management and diffuse pollution through to domestic discharges.

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?

A wide variety of multiple opportunities are necessary for public engagement. These need to start with **enjoyment, fun and recreation** in the natural environment for all sectors of society, and go through to **opportunities for volunteering, skills development, involvement in decisions and empowerment to take local action.**

Building enthusiasm in the younger generation through **work in and with schools** is very important. This includes straightforward curriculum work, but direct experience with the natural world is crucial, and **outdoor and environmental education visits and trips** have an increasing number of hoops to jump through and other (mostly indoor) activities to compete with. The **Forest Schools** programme has been very effective both in our area and elsewhere. We have supported a number of projects developing '**outdoor classrooms**' enhancing the environmental value of school grounds. We have also supported an innovative project operating **Farmers' Markets in school playgrounds**, linking both children and parents with local food, farming and sustainability issues.

We have supported the formation and running of several **Community Wildlife Groups** in the Shropshire Hills, some of which have gone on to carry out detailed survey work which has fed directly into improving the environmental benefits from High Level Stewardship, by enabling targeted action at locally scarce species such as breeding lapwing and curlew. It is worth noting that the efforts of these community groups only come to fruition through the publicly funded mechanism of agri-environment schemes.

We have formed a **Friends** of the Shropshire Hills group, through which members receive a newsletter and can attend certain events. People appreciate the social benefits of this kind of network, and enjoy coming together to share their enthusiasm for the landscape and finding out ways of getting more involved. In our experience, many people value the natural environment, but are not confident of their knowledge, and may be put off by a feeling of complexity. By contrast, they often seem more comfortable with history and heritage, especially where they can relate to their own experience and memories. Some projects have successfully used **history as a 'way in' with communities, leading on to work on the natural environment**, perhaps through people's memories and perceptions of the way in which landscapes have changed.

Case Study - 'Down to Earth'

Down to Earth was a process of community consultation used in our Blue Remembered Hills project from 2003-7. At its heart was a simple approach of **asking local people what they valued about their local landscape**, what changes and trends they saw, and what ideas they might have for projects. A skilled community development worker was used to gain links into a community of several parishes through existing networks, and to provide new information in the form of talks, visits and events, and support a steering group to define and develop project ideas. In community action on the environment, a little support can go a long way. Some projects provided with seedcorn funding of £100 in the project went on to raise tens of thousands. The input of the paid staff time unlocked activity in communities which may not have been active already.

Information on local assets is very valuable to support community action, such as through **accessible web-based resources**, e.g. Nature on the Map, MAGIC, etc., but the value of face to face support should not be overlooked as it is often what makes the difference. Shropshire

operates an innovative **Ecological Data Network** where records from various specialist groups are collated and made available through a website www.naturalshropshire.org.uk as well as being fed into the National Biodiversity Network.

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?

Civil Society has a hugely important role to play in relation to the environment. People's attachment to their environment is fundamental and provides benefits both ways. Communities working together can achieve more than individuals. However, it **should also be recognised that the environment is a public good, which is not adequately protected by market and social mechanisms, and is therefore a legitimate area for public spending.** Everyone benefits from it. Government funding can act as a core from which to build. While the role of the voluntary sector can be expanded, there are some things which it cannot do, and in some cases issues of accountability (e.g. regulatory roles).

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

Government does indeed need to incentivise local action, but it must be recognised that not everybody is motivated by government-led schemes. There is an interesting if slightly paradoxical similarity between the government's localism agenda with certain aspects of 'counter-culture' which have a strong environmental dimension. Government regulatory systems need to be able to embrace new ways of doing things, recognising what is environmentally benign or even beneficial and focussing resources on addressing the most serious forms of environmental damage.

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?

Local authorities have a **statutory duty** to pursue economic development and this needs to be **broadened to sustainable development**, with a strong environmental dimension. This would give a stronger basis for integrated working across departments, and avoiding pigeon-holing environment and sustainability into often minor sub-departments. The role of the environment in **Community Strategies** could be strengthened by national guidance. Local strategic partnerships tend to have theme groups often including environment. While valuable, maintaining the environment as a thread through other areas such as economic development, training and learning may be better achieved by ensuring **representation of environmental interests on other theme groups.**

The ability of the natural environment to benefit **health**, both mental from relaxation and inspiration and physical from outdoor exercise, should be maximised. There are many good examples such as **Walking for Health** and projects helping **disadvantaged and under-represented groups** to gain more from the countryside and natural environment.

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?

Organisations need capacity. These linkages across geographical boundaries and departmental remits are the things which tend to be lost when reducing workforces have to focus ever more tightly on their own organisation's or department's narrow areas.

In the Shropshire Hills AONB we have developed cross-border working with Wales, focussed around Offa's Dyke and developing sustainable tourism based on the area's landscape and special qualities.

Linking the natural environment with the main economic and social influences on it requires **environmental professionals to engage actively with these other interests**, often requiring a step outside the comfortable company of those with similar views. In the Shropshire Hills AONB we have done a lot of work with **farming and local products**. We have built our links with the business sector through a **Shropshire Hills Sustainable Business Scheme** with over 90 members, offering a simple form of accreditation in return for a pledge of sustainability action from the business. Especially applicable to local producers and tourism businesses, the Scheme has also built a wide variety of other links both for us and the businesses themselves.

In relation to economic growth, transport and planning, the approach of **an area environmental designation with resources** works well, as it provides a justification for a different approach in an area of higher environmental value and provides a structure for these other interests to engage with.

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

National planning guidance needs to put sustainable development at the heart of planning, and healthy ecosystems at the heart of sustainable development.

The removal of the regional tier of planning will provide **challenges for addressing issues which need considering at a scale above that of Local Development Frameworks**. River catchments and Character Areas will continue to be useful units and scales of working. **Green Infrastructure planning** will remain a very important process, especially around larger settlements.

Ecological and other records are important. Decision makers need access to adequately interpreted, timely and relevant information on the environmental context, value, assets and issues in their areas.

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?

It is increasingly a part of long term business planning to look at the natural assets which are used and invest in them. Moves towards developing **markets for carbon** will be valuable, provided the price is high enough to provide a real incentive. Land management needs to become more influenced by **new payments for ecosystem services**. We are aware of valuable new work in this area by Defra and Natural England which needs to be continued and developed further.

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

Tax incentives and support through **public sector procurement** will help. Trusted and reliable **accreditation schemes** are also necessary however, to maximise the much bigger influence of consumer spending choices. The Forest Stewardship Council scheme for timber and wood products is a good example. There are others in the food sector, although arguably rather a confusing plethora of different schemes.

Many businesses are seeing this direction as an important **strategic business approach** rather or as well as being altruistic. The move to a lower carbon economy offers **cost savings** where transport and energy inputs are reduced, and big opportunities in expanding green technology fields, e.g. renewable energy.

We have discovered directly through our work the **potential for greater progress with businesses in relation to waste**. In a very rural area such as ours with many small businesses the solutions may be somewhat different, but the established concepts of the waste hierarchy remain valid. In response to issues raised by members of our Shropshire Hills Sustainable Business Scheme, we recently undertook a review through a post-graduate student placement of commercial recycling, and produced a series of area-based guides for business which have addressed an information gap. Through this Scheme and a number of Sustainable Development Fund projects we have supported many small businesses with energy saving, carbon reduction and other sustainability initiatives.

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

The **sectoral, specialist approach** often observed is a substantial barrier. While this may be overcome to an extent by changes in organisational structure and culture, **reductions in resources risk exacerbating the problem**, as it is in these circumstances when organisations tend to focus more narrowly and lose wider linkages. **Local capacity and structures for integration** such as those found in the AONB model have an important role to play in overcoming these barriers.

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

The **capacity of organisations** can be a real barrier. These approaches involve working on privately owned land, and there is a need for **slow and patient work to win hearts and minds** of landowners and local communities.

Multiple benefits (e.g. biodiversity, landscape, flood alleviation) are not always factored in or part of investment decisions. A **greater recognition of ecosystem services in agri-environment schemes** would help this.

Areas of publicly owned land can be a key catalyst to landscape scale working, a building block of wider ecological networks. As an example, the 'Back to Purple' project in the Shropshire Hills was recently announced as a regional winner of the UK Landscape Awards. This project restored heathland on land around the Stiperstones National Nature Reserve. Without this well managed 'core' area there would have been neither the ecological or organisational capacity to undertake the project. Current **moves to dispose of publicly owned land may increasingly become a barrier** to achieving landscape scale action and benefits.

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?

Climate change, population, biodiversity and resources – the whole **inter-related package of environmental issues** needs to be represented. We need to look at the impacts overseas of our consumption, using imported products. The UK should lead by example. New **biodiversity commitments** from the Nagoya Convention meeting are likely to be challenging.

The UK's protected areas form part of wider international networks, for example AONBs and National Parks are Category V protected areas in the IUCN classification, and England's SACs and SPAs form part of the European Natura 2000 network. The UK is an established leader in the '**protected landscape approach**', in which cultural value is recognised alongside ecological value and positive management is taken forward in partnership with local communities and landowners. The concept of 'landscape' as a holistic framework for considering natural and cultural value, as outlined in the **European Landscape Convention**, is very valuable, and the Convention outlines some important actions which the UK government should continue to progress.

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?

Climate change rightly has prominence, but needs to be seen as one of a suite of resource issues, any one of which could become critical for the human population over the coming few decades. Action needs to focus on harnessing and maintaining the recent momentum behind climate change into a **broader environmental agenda focused on basic life processes** (see suggested overarching challenge in Q2 above), with a real sense of urgency.

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