



Consultation on measuring environmental change – draft indicators framework for the 25 Year Environmental Plan

Introduction

This is the response from the Open Spaces Society (OSS) to the Department for the Environment and Rural Affairs (Defra) on its proposals for measuring environmental change.

The OSS was founded in 1865 and is Britain's oldest national conservation body. It campaigns to protect common land, village greens, open spaces and public paths, and people's right to enjoy them.

The Society welcomes the opportunity to respond to the consultation. However we are concerned that many of the indicators and metrics require further resources and development in order to be deliverable and there is no indication as to how and when this will be resolved which will undermine the proposals.

There is little emphasis on the enhancement of land and ecosystems. The draft framework refers to reducing loss or maintaining the current condition. It would be better if the metric could reference, for instance, an increase in the condition of protected areas, rather than just the condition itself.

We are concerned that the indicators, (H14 – 17) around people enjoying and caring for the natural environment are ambiguous because there is a huge difference between enjoyment and engagement. It is not clear whether measuring engagement will measure enjoyment or if it would be better to separate them.

Will the indicators and metrics help in the understanding of enjoyment and the benefits from enjoyment and act to increase that enjoyment, or will they conflate issues in a way which confuses things?

The Society welcomes the 25 Year Environment Plan but metrics and indicators must be clear and deliverable otherwise the ambitions of the Plan will be weakened.

It is vital that everyone has access to high quality natural green space to contribute to their well-being as well as mental and physical health.

This response only relates to the metrics relevant to the core interests of the OSS.

It is important that the indicator framework is kept under regular review so that it continues to be relevant and provide the best ways of assessing progress.

Headline indicator descriptions

1. Changes in **air quality** that affect our health and ecosystems
The contribution of green infrastructure should not be overlooked in respect of air quality and public health benefits.
3. Changes in **wildlife and wild places** that we cherish
It is crucial that common land, habitually important for biodiversity, landscape, recreation and archaeology, is recognised and included when looking at the condition of important areas and not be limited to Sites of Special Scientific Interest (SSSIs). The metric is extremely broad and currently only references the condition of an SSSI. Land may therefore meet a target of being in a 'favourable condition' but not meet other conservation objectives. There must be robust monitoring in place.
4. Changes in nature on **land and water** that affect our lives and livelihoods
Are the resources available to develop this aspect?
5. Changes in the quality of our **landscapes and waterscapes**
The goal here is 'enhanced beauty, heritage and engagement with the natural world!

We are concerned about the administrative and legal structures for schemes purporting to deliver environmental protection on common land. Existing mechanisms for such purposes, involving agreements with individuals who purport to represent the majority of the commoners on a common, have proved unsatisfactory, particularly where individuals do not wish to be bound by the decisions of the majority or where the owner of the common does not agree with the commoners. Once again further development is required. Are resources available or allocated for this?

The Society welcomes the enhancement of green/blue infrastructure under H13 and in particular the accessibility and function of green infrastructure delivered as part of new developments within the planning system. It is crucial that such land is adequately protected for use by future generations and it must be registered as a town or village green under the Commons Act 2006.

6. Changes in **people enjoying and caring about the natural environment**
We believe that everyone should have access to high quality natural green space where they live to contribute to their well-being and mental and physical health.

However, enjoyment generally reflects physical use whereas engagement could happen at home. While people can enjoy wildlife programmes on the television and support social media campaigns, interventions that would result in more

people 'enjoying' would be different to those that would get more people 'engaging'.

Will the indicators help us to understand and act to increase enjoyment and the benefits from enjoyment or will they conflate issues in a way to confuse things?

It is not clear what is actually going to be measured here. Is it about attitudes and people's connection to the countryside/nature. There should be reference to conservation volunteering for instance.

The United Kingdom's departure from the European Union provides an opportunity to model funding schemes for agriculture to ensure that public money achieves maximum public benefit and promotes public well-being. Public benefit must include public access, whether by paths or open access land. Such assets support local economies and improve people's health and well-being.

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