Response to consultation: Measuring environmental change – draft indicators framework for the 25 Year Environment Plan

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Response from The Buckinghamshire and Milton Keynes Natural Environment Partnership (the "NEP")

Introduction

The Buckinghamshire and Milton Keynes Natural Environment Partnership is the area's Local Nature Partnership. We bring together local authorities and organisations from across the public, private, health and education sectors, as well as from conservation and community organisations to champion the value of the Buckinghamshire and Milton Keynes environment in decision-making, and to encourage environmental protection and improvement for multiple benefits – for the environment, businesses and the economy, and the health and wellbeing of communities and the society of Buckinghamshire and Milton Keynes.

We welcome the opportunity to comment on the proposed indicator framework to measure progress towards the goals of the Government's 25 Year Environment Plan.

Our response is based on input from our partners, alongside review and reflection of the proposed framework, the 25 YEP goals, our own local State of the Environment Report (which made use of locally-available environmental data, and was published in 2016 – available on our website here) and learning from our current work priorities including preparing a working net biodiversity gain and biodiversity accounting scheme for Buckinghamshire and Milton Keynes and working with other LNPs on an environmental vision for the Oxford to Cambridge Growth corridor.

Summary

Achieving the right balance between simplicity and manageability of indicators with achieving a meaningful and comprehensive data set is not easy, but we welcome overall the following in particular in striving to find this balance:

- Firstly, we welcome the consultation's emphasis on the need to keep any framework and its indicators under regular review considering data availability and cost-effectiveness, but this

should be balanced with the need for consistency in indicators, data and its collection in order to discern comparable changes over time.

- We also welcome the decision to keep the set of indicators to a manageable number, and include indictors and metrics for which measures have not yet been developed, and among quantitative metrics, also descriptive ones.

- We welcome the simple and effective traffic light system to indicate the direction of travel with the metrics as they are re-measured over time.

- And also the recognition that the indicators are not the only way to ensure progress (e.g. as noted in the consultation, other sources such as the comprehensive Natural Capital assessments every 10 years).

In general, the NEP advocates that any metrics to measure environmental change should be:
- SMART, clear, precise, meaningful to the objectives
- Outcome-focused not (just) process-focused or output-focused.
- Directly related to the aims of the 25YEP, covering all policy themes and objectives
- Informed by existing targets / data sets where available
- Aware of resource implications of collecting / analysing new / different data

In respect of measuring progress towards the 25 YEP, the headline indicator set and underlying metrics need to be:
- Able to answer whether net environmental gain has been achieved
- Consistent with existing data sets and over time, with minimal changes, but taking into account the latest methodologies and thinking, to enable direct comparisons over time
- Analysed in conjunction with other available data (e.g. the NC assessments)
- Analysed and compared on consistent scales and time-frames where possible and appropriate.

On review of the proposed data and indicators, the NEP suggests the following:

Emphasis on soil health as a key aspect of natural capital
The headline indicators include aspects of water, biodiversity, air, the relationship between people and the environment, seas, natural hazards, pests and diseases, and chemicals as well as production and harvesting. As a key element of natural capital, the NEP questions whether soil health should be more prominent as a headline indicator, rather than a sub-indicator within the "production and harvesting of natural resources" headline indicator.

Headline indicator descriptions could be clearer
Overall, the names of some of the 15 headline indicators could be clearer, more descriptive and more distinct from each other in describing the nature of the specific underlying indicators that combine to inform them. This would help avoid confusion as to what exactly the headlines are trying to measure and seeming overlap between headline indicators.

For example, it is not immediately clear what the difference between the headlines "cherished wildlife and wild places" and "nature on land and water" is – as on the face of it, the latter would presumably include the former; also it could be argued that all nature on land and water is "cherished". It is not immediately obvious what each refers to or whether there is a difference between them from these names. There is a need to review and understand the underlying indicators and data sets to understand the differences. The titles alone imply similar aspects of the environment, and so risk being seen as overlapping or headlines could be misinterpreted.

Also checking that underlying indicators measure separate aspects of the environment and are appropriately labelled to make this clear will assist with interpreting what the data says about the changing environment.

Further information is needed about data collection expectations / scale / use and resource implication for this at the local level

The consultation document does not detail responsibilities or expectations as to how / who / where or over what scale the data is intended to be collected.

There will be resource implications of any new data requirements – in collection or analysis - from local areas.

We would also welcome further information as the indicator framework is developed on which specific will be measured (for example. within the species and wildlife indicators in particular).

Data manipulation should be available to users

The NEP considers it important that users of the data sets and indicators should be able to manipulate the underlying indicators and re-group them to enable analysis at the national or local level to answer questions.

For example, re-grouping the underlying indicators into different groups to cover the status, condition and changes in i) assets, ii) pressures and iii) services or benefits may help better understand what the data is saying in natural capital terms and from that perspective, and to answer overarching questions such as whether there has been net environmental gain.

We would therefore welcome clarification as to whether the data for the indicators will be available at the local level and how and whether the data will be available for manipulation and interpretation locally as well as nationally.

Indicators should measure against the 25 YEP policy themes as well as the 10 goals

We would also welcome further consideration and/or explanation as to how the indicators will be used to assess progress towards not just the ten 25 YEP goals but also the six policy areas, so that questions such as the following can be answered:

- Has environmental net gain been achieved?
- Has the environmental net gain principled been "embedded"?
- Have the benefits of woodland been maximised?
- How effectively is biodiversity loss being tackled?
- How much "additional wildlife habitat" through the Nature Recovery Network has been created and has this reached the goal of 500k ha?
- How are green spaces improving people's health and wellbeing?
- Are people using their green spaces and how is this changing over time?

- Are our children close to nature?
- Have our towns and cities become greener?
- Have 1m urban trees been planted?
- Are we on track to meet the target of 12% woodland cover by 2060?
- Are we planting more trees in and around towns and cities?
- Have the goals of zero avoidable waste by 2050 and zero avoidable plastics by 2042 been achieved?
- Have we reformed the approach to water abstraction?
- Do we respect nature in how we use water?

Conclusion

Overall, we welcome the proposed indicators and their breadth to cover the condition of the environment and people's enjoyment of it. Many of the indicators will need new resourcing to provide meaningful and robust data. If data could be published at a sub-national data it would help local authorities, delivery agencies and others to track progress and identify trends.

However, we are keen that the indicator headline names are clear and descriptive to understand their contents, that further information is provided as to how the data is intended to be collected and analysed, that appropriate consideration is given to the resource implications of this locally, also that the data collected is made transparent so that users can re-group the data to make different types of assessment of progress. We also advocate the need for the data collected to be able to answer some of the big underlying questions posed by the goals and policy themes of the 25 Year Environment Plan.

We look forward to your acknowledgement of receipt of our response and to hearing a response to the issues and thoughts we raise.

Specific consultation responses

The NEP's views, thoughts and suggestions in response to the specific questions asked in the consultation are provided below:

Figure 1: The NEP's views, thoughts and suggestions on individual consultation questions

| 1. Whether the proposed framework describes the environment in a meaningful way | How the environment is described in the framework should be consistent with how it is described in the Government's 25 Year Environment Plan.

The headline indicators include aspects of water, biodiversity, air, the relationship between people and the environment, seas, natural hazards, pests and diseases, and chemicals as well as production and harvesting.

More emphasis on SOIL health
Thinking of the underlying elements of natural capital, has enough emphasis been given in the framework to soil health as a sub-(or |

underlying) indicator with the "production and harvesting of natural resources" headline?

Headline descriptions
In terms of the draft 15 headline indicators, Figure 1 on page 8 in the consultation document shows how the 10 goals of the 25 YEP Plan relate to the 15 selected headline indicators. Each goals seems to have at least one headline indicator attached to it, with the goal of "*enhanced beauty, heritage and engagement with the natural environment*" having 2 headline indicators associated with it, and "*thriving plants and wildlife*" three.

There are also two headline indicators covering the overseas environment – impacts on the natural environment and improving the natural environment. Whilst it may be helpful to have indicators specifically relating to the overseas UK environment we would question whether these are specific aspects of the environment or just geography and therefore whether they should be separate headline indicators?

Names of headline indicators are not immediately clear
As a headline indicator set, however it is not immediately clear what the difference between 3) "cherished wildlife and wild places" and 4) "nature on land and water" is. On the face of it, "nature on land and water" should encompass 3; and as many would see "nature" on land and water also as "cherished", the headline indicator 3 is also a confusing name if wanting to differentiate between the two. **There may be a more descriptive title for each**. Examples are provided below:

Looking at the underlying indicators in Section B
The "Cherished wildlife and wild places" headline indicators comprises underlying indicators on the status of native species and the condition of protected sites plus priority species information as an "other" system indicator. Could this be labelled "Protected sites, and priority and native species" as a more accurate and less overlapping title?

The "Nature on land and water" headline indicator comprises underlying indicators on functional species, the quantity, quality and connectivity of habitats and characteristic species (birds, butterflies etc) of farms, woods, wetlands and coasts, along with the "other system indicator" of the area of woodland in England.
Is it helpful to combine two habitat-related indicators (habitat quality, quantity and connectivity; and woodland area) and two species indicators (functional species and characteristics species) to provide one headline indicator? Would these be better represented separately (i.e. as one-related habitat indicator and one species-related indicator?)

Also **would any "native" species within the "cherished wildlife and**

wild places" indicator also run the risk of needing to appear within the functional or characteristic species indicators in the "nature on land and water" indicator?

One other possible overlap in the indicator set that stands out is within the headline indicator "Landscapes and waterscapes". This includes "enhancement of green / blue infrastructure (H13).
Shouldn't the connectivity of habitats (within H9 – quantity, quality and connectivity of habitats, from "nature on land and water") appear in this GI measure (H13) too?

H13 – it will also be important that the enhancement of green / blue infrastructure according to the indicator being developed from the new framework of GI standards is capable of being applied at all scales and not just within "towns and cities" and for all types of GI – not just "woods" as implied in the technical description of H13 (page 38 of the consultation).

H9 (quantity, quality and connectivity of habitats), H11 (changes in landscape and waterscape character) and H13 (enhancement of green / blue infrastructure)– also seem very related, but appear under two different headline indicators (H9 in nature on land and water; H11 and H13 within landscapes and waterscapes). It would be helpful to understand why they have been split to feed into two separate indicators when they appear to measure similar aspects of the environment.

In addition, the title "changes in landscape and waterscape character" (H11) is very broad, and would benefit from better describing what it is measuring. It is not clear exactly what this is measuring – is it trying to assess changes in the condition of national character areas as a proxy for the goal of enhancing beauty of natural scenery and improving its environmental value? We would welcome clearer explanation as to what would be measured, how and why.

Finally, H14 and H15 also seem very similar. They lead the NEP to ask how "being engaged in social action for the environment (H15)" is so different, and worthy of a separate headline indicator, to H14 – "engagement in the natural environment?" This would benefit from a more thorough explanation.

Overall
Soil health is on key asset of natural capital that does not have its own headline indicator.

The names of the headline indicators could better describe the specific indicators included within them to avoid confusion and seeming overlap between headline indicators.

Also checking that underlying indicators measure separate aspects of the environment and are appropriately labelled to make this clear will

	assist with interpreting what the data says about the changing environment once collected.

Finally, we would welcome further information as the indicator framework is developed on what will be measured (e.g. within the species and wildlife indicators in particular), whether the indicators are available at / collected at the local level and how the data can be manipulated and used locally as well as nationally.

For example, there may be benefits from a natural capital angle to see changes over time between indicators differently grouped – for example to cover assets, pressures and services or benefits. |
| **2. Potential gaps in the headline indicators and / or system indicators and how to fill those gaps;** | Some of our views to this question are covered in our answer to question 1, (please see our response, above).

In addition, on looking at the technical summary of indicators, we agree with the consultation suggestion that **an indicator/s on pressure on water resources would be helpful** – this is particularly relevant to us in our area where major development and growth is expected and where it will be vital to plan early and strategically in the first place, and then carefully and regularly track pressures, responses and impacts on water courses of all types, not just on whether waters achieve sustainable abstraction criteria.

We would also welcome consideration of air quality not just from the perspective of human health, but for the health of wildlife and biodiversity too.

Our own State of the Environment Report also looked at the % **electricity consumption in the area from renewable and non-carbon sources; and recycling rates, which would also assist with forming a broad picture of the health of the environment.**

We would welcome, within the development of the H13 GI-related indicator on the enhancement of green / blue infrastructure, consideration of:
- The vision and principles set out in our document looking at how to improve green and blue infrastructure [see link to our website here, click on "outputs" and see summary on pages 4 and 5];
- Proximity of households to green space of different sizes / functions;
- Use of green space;
- Areas of urban green space (and perhaps standards to measure against e.g. for new developments) |
| **3. Whether the overall number of headline and system indicators is appropriate. Are** | We are not an expert on this. However, the proposed set of 15 indicators seems about the right number to be manageable.

In our view, however, the more important aspect is whether all key |

there too many, too few?	**aspects of the 25 YEP are being measured and monitored (see answers to Q1 and 2**) and whether grouping any of the indicators into one headline may risk devaluing the underlying indicators, depending on how the data from each underlying indicator is interpreted (see our answer to Q1 – e.g. soil health - and Q4). **Transparency in both how the indicators are grouped and how the headline indicator assessment is made** as a result of the underlying results is something we would and do welcome, along with the ability to easily access and re-group underlying and sub-indicators for different interpretation.
4. The approach to bundling information in the indicators. Is it better to combine multiple data sources within summary indices or to be more selective about which data to present and assess?	**This would depend on the questions needing to be answered and how it is intended that the underlying indicator results will inform the overall assessment** of whether the headline indicators receives a green, amber or red "traffic light" in the assessment. **For example - do all the underlying indicator sets count equally in forming the "traffic light" assessment?** For example, what if 2 underlying indicators are green and one is red – would the result be amber overall or will the results have to be weighted according to the indicator set? Also – where one headline indicator is fed by many more underlying indicators than another, there is a risk of devaluing the underlying indicators where more are needed to form the headline assessment. The more underlying indicators there are, the less each "counts" if they all count equally. More information on how this is intended to be interpreted is needed to answer this question. Whether to bundle or not depends on the questions being answered and how it is intended the traffic light system assessment would work – e.g. how would the indicators help to measure and track overall "environmental gain"? And how can we use and split the underlying indicators to build a picture of the status/ condition / trends with e.g. assets, pressures and benefits / services much like the structure of the 25YEP. (Currently, the headline indicators are composed of some of each of these). Overall – we believe transparency will be an important part of the answer to this – and we would welcome it in terms of describing both how the indicators are grouped and how the headline indicator assessment is made as a result of the underlying results, and in being able to access the data and re-group or re-interpret it to answer different questions.
5. Data that you possess which is relevant to the framework and could be shared to update any of the proposed	The NEP doesn't "possess" specific data, but we have used much available locally which may be helpful for the framework– see for example our own State of the Environment baseline assessment from 2016 (covering Bucks and MK); and also our Green Infrastructure Opportunities Mapping document (which

indicators;	accompanies our GI Opportunities map) – page 35 in the presentation lists the data accessed and used.
6. How you might use the framework and which aspects of it you see as being particularly important; and	The NEP may make use of the framework and the data it produces for the following purposes: - Review what data is available / being collected locally to help update our own State of the Environment assessments (baseline 2016) and whether any new data sources / indicators are relevant. - We could also use this to assist with monitoring progress in implementing the 25 YEP along the Oxford to Cambridge Growth corridor and monitoring change over time. - We would welcome assistance to achieve consistent NC data and mapping across the corridor, plus resources to collect and collate data to help monitor change over time.
7. The balance and scalability between local and national levels.	The NEP suggests the national picture should be built from collated local data where available. However, to make the metrics work at the local level we would welcome consideration of the following points: - Data collective locally must be consistent – in measurement, format, baselines, when measured, etc. - Any new requirements for data collection, collation or analysis locally mean a requirement for new resources to do so. - Data collectors / providers may need resources to collect any new data required / or to process existing data to make it consistent. Take account of the existing and potential role of collecting and collating data for local environmental records centres - Data for measurement must be readily available and updated regularly enough to inform the 25YEP updates - Some environmental data is better collected at certain times of the year. Some data would not change much annually. - A request that indicators are fed from data being collected anyway as much as possible.