

Environmental Priorities for the next UK Government

June 2024



EPF

ENVIRONMENTAL
POLICY
FORUM

About us

The Environmental Policy Forum (EPF) is a coalition of 14 professional bodies and learned societies promoting environmental sustainability and resilience for the public benefit.

Collectively we represent over 110,000 qualified professionals across a wide range of different specialised disciplines, often working in industry or the public sector and many running successful businesses.

We look forward to working with the next UK government, and the devolved administrations where appropriate, to deliver on our environmental and climate commitments.

Together, we stand ready to facilitate consultation with our extensive network of environmental professionals in order to help take forward these urgent and vital issues.

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Supported by:



Our 10 priorities for the next UK government

1

Improve environmental governance to ensure effective policy delivery

2

Unlock the enormous social, economic and environmental potential of green jobs and skills

3

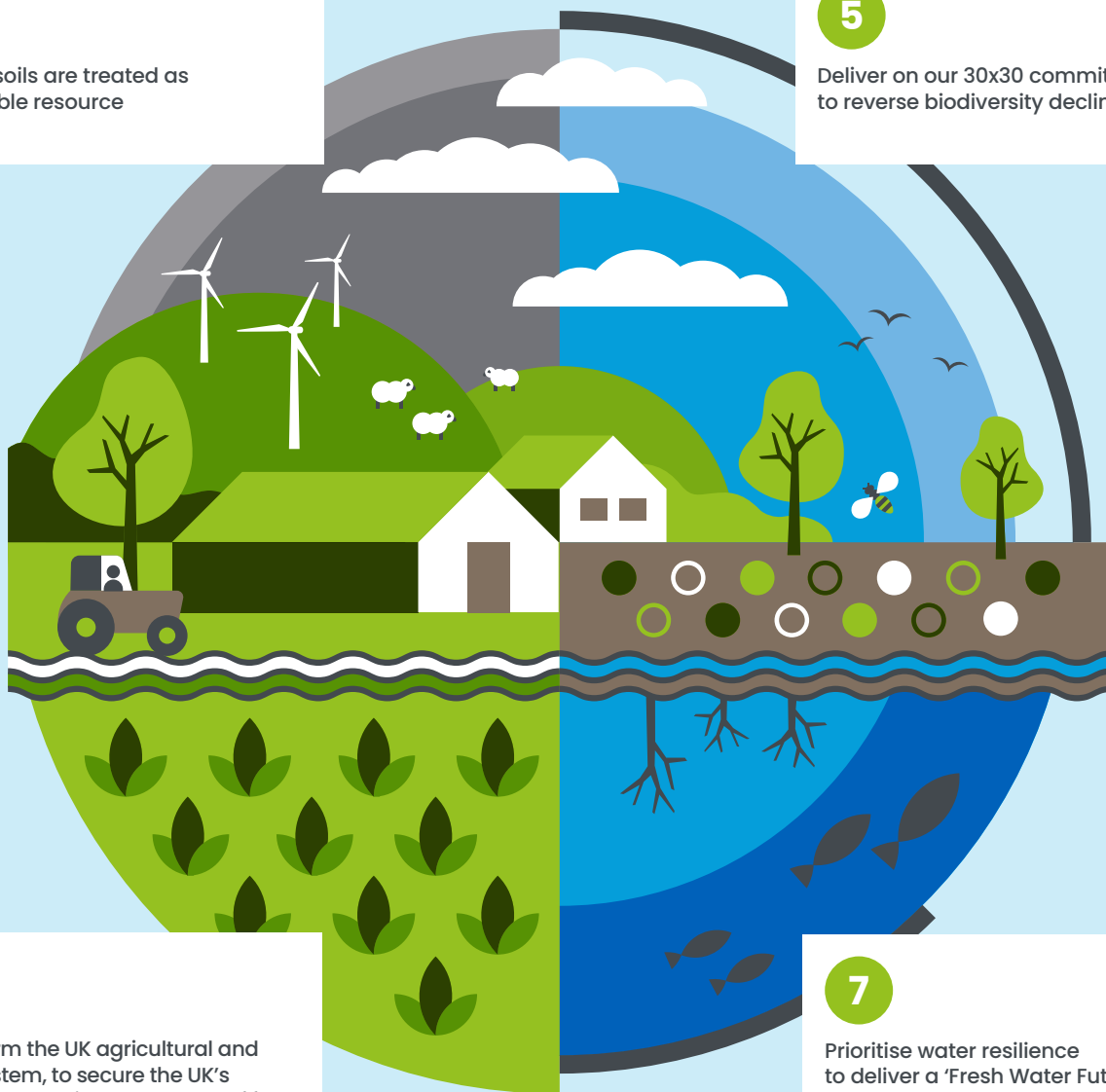
Take a holistic approach to land use

4

Ensure soils are treated as a valuable resource

5

Deliver on our 30x30 commitment to reverse biodiversity decline



6

Transform the UK agricultural and food system, to secure the UK's access to sustainable sources of food

7

Prioritise water resilience to deliver a 'Fresh Water Future'

8

Increase ambitions and holistic action for a country with cleaner air

9

Deliver a truly circular economy

10

Unlock investment in low carbon technologies to deliver net zero

Cross-Cutting Priorities





1 | Improve environmental governance to ensure effective policy delivery and enforcement

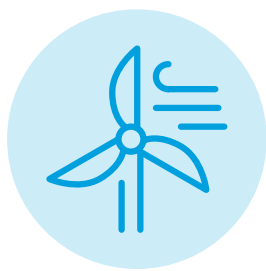
There is much to welcome in strategies such as the Environmental Improvement Plan (EIP) and policies including Biodiversity Net Gain (BNG). However, the UK is largely off track to meet our environmental and climate commitments and a leading reason behind this is limitations in policy delivery and enforcement. The environmental governance landscape is currently failing to deliver joined-up policy, with disconnects between government departments, the four nations and between national delivery and the local nature recovery strategies being rolled out at the local level. Another example of this disjointedness can be seen between the delivery of the EIP and the environmental impact assessment reform that is being delivered through the Levelling Up and Regeneration Act – specifically in terms of the interactions between the EIP goals and the move towards Environmental Outcomes Reports, as part of the new environmental assessment regime for England.

The benefits of improving environmental governance would be significant, identified by the Office for Environmental Protection in its recent [progress report](#). In calling for more focus to be placed on policy delivery, including for the development of a delivery plan for the EIP and each of its goal areas, it recognises, as we do, that the current governance landscape causes confusion and inefficiency. At every level of governance there can be improvements to make policy delivery more efficient and less costly, and enforcement more effective. Our three specific asks for achieving this shift are below, underpinned by the need for regular consultation with experts and practitioners at every stage of the policy process, to ensure policy is evidence-based and deliverable.

Our 3 specific asks

Policymakers, with support from business, should:

- 1 **Take a joined-up approach so policies are integrated and don't contradict each other.** Ensure that the policy instruments related to the 2021 Environment Act (notably the environmental targets, principles statement and EIP) are delivered in full consideration of how delivering one instrument affects another. This integrated approach should be underpinned by a commitment to non-regression.
- 2 **Establish full understanding of key policies.** Ensure there is full understanding and appropriate use of the principles statement across government to inform policy choices. Ensure that the national EIP is effectively translated and applied at a regional and local level to drive appropriate action.
- 3 **Ensure stronger enforcement of regulation.** Ensure that sanctions for breaches act as an effective deterrent and that regulators have the capacity to effectively enforce regulation. Reverse the extension of the growth duty to Ofgem and Ofwat which undermines existing regulatory compliance and processes.



2 | Unlock the enormous social, economic and environmental potential of green jobs and skills

The government has committed to delivering two million green jobs in the UK by 2030 – welcome recognition that these jobs are increasingly needed and that all jobs will soon require some level of green skills. However, these jobs need to be filled by skilled people which requires an urgent, significant increase in investment, including providing incentives for people to enter green jobs, as well as investing in lifelong learning, from recruiting more teachers, to providing quality training and CPD for all career levels. There is a lot of evidence demonstrating widespread current green skills gaps and shortages across sectors, including our own 2023 research. Furthermore, a recent YouGov poll found that 65% of British adults believe they do not have access to green skills training through their employer. These are challenges that businesses and organisations are already facing, so the projected increase in green jobs required over this decade shows how investment in green skills needs to increase at scale and pace.

Green jobs provide huge opportunities for the UK, as impressively outlined within the 2023 Skidmore Review, which referred to the ‘historic opportunity’ to achieve economic growth and net zero by 2050. This is reflected in the current [net zero strategy](#), which noted how implementation of the strategy could create another 440,000 well-paying jobs and unlock £90 billion in private investment by 2030. Despite some positive initiatives such as Skills Bootcamps, these benefits have yet to be fully realised, with [recent reversals](#) on some key energy related policies weakening our roadmap to achieving net zero by 2050. In addition, policy reversals and a lack of policy integration have contributed to a confusing, unstable environment for investors. More policy certainty from government would help skills and training providers considering investing time and resources in green skills programmes. Policy should also be based on evidence, including that [offering financial incentives](#) can significantly increase interest in taking up green skills training.

Our 3 specific asks

Policymakers, with support from business, should:

- 1 **Ensure effective delivery of the outcomes of the work that was being undertaken by the Green Jobs Delivery Group.** This should comprise the publication of a green jobs plan that maps out the action that is required across sectors to develop the green workforce of the future. Government should also work with industry to identify skills gaps at all professional levels and take the urgent action needed to alleviate skills shortages.
- 2 **Embed green skills throughout the national curriculum and lifelong learning programmes.** Taking a joined-up approach, this should include increased provision of quality green skills training and offering financial incentives to ensure strong take-up of this training.
- 3 **Establish a permanent green skills focused cross-government body.** This body should take a strategic, joined-up approach to green jobs delivery.



3 | Take a holistic approach to land use

Competing land uses require a more holistic approach to secure all the potential benefits of land. Currently flood risk management, forestry policy, agricultural policy and environmental policy operate in competing silos, with different policies undermining each other and agri-food interests dominating politically. Only government can coordinate activity across these different land use policies to maximise opportunities and synergies, avoiding perpetual conflict between policies to no benefit to the stated environmental objectives. The emphasis on net zero by 2050 will inevitably impact on the development of agricultural policy throughout the UK, with greater attention on the environmental impacts of land management. The growth of the bioeconomy and changes in global supply chains for all primary industries post-Brexit and post-pandemic, are also driving the need for commercial activity and the economy to be better reflected in our approach to land use.

The need for an integrated approach to land use that incorporates trees, woodlands, and forests, as well as other vital natural assets such as soil, biodiversity, and freshwater, is necessary to address the linked challenges of climate change and biodiversity loss. A Land Use Framework for England could address these issues by informing and facilitating decision making, providing confidence for Local Authorities, businesses, and land managers to make meaningful decisions about land. Explicit inclusion of brownfield regeneration, urban landscapes and the integration of green infrastructure could provide public health benefits, support sustainable economic development and give people better access to nature. It could also provide a clear distinction between marginal, semi-natural and upland landscapes, explaining the overlapping nature of categories. A National Strategy for Green Spaces and implementation plan would address the disconnected nature of land use policy, regenerating the natural world while accelerating the delivery of housing, economic benefits, and food security.

Our 3 specific asks

Policymakers, with support from business, should:

- 1 Deliver the land use framework for England.** Develop a land use framework and long-term strategy addressing the trade-offs between competing ecosystem services, aligning Local Nature Recovery Strategies with other land use policies.
- 2 Secure multiple benefits through planning.** Navigate trade-offs across different land uses to ensure housing infrastructure and delivering economic benefits do not cause environmental degradation.
- 3 Take a strategic approach to green spaces.** Introduce a National Strategy for Green Spaces to remove the spread of policy across departments and ensure there is a central government organisation responsible for green infrastructure.

Thematic Priorities





4 | Ensure soils are treated as a valuable resource

Soil has enormous importance to our lives and livelihoods and its health a key indicator of the state of our environment. Despite this and a growing recognition of the role soil plays in our environment, factors such as over-use, erosion, nutrient imbalance, and pollution have meant that much of the UK's soil is now heavily degraded. Furthermore, an estimated 58% of tonnage received by landfills is soil, reflecting that too often soil is regarded as a waste instead of a valuable resource. There are currently significant barriers and gaps for achieving optimum soil health and reuse in current policy and practice. To rectify this, we need to see legislative and regulatory change such as soil health targets and indicators, which affords soil the same environmental status as air, water, biodiversity, and resource efficiency.

Treating soil as a valuable resource brings with it huge benefits, especially as we face increasing environmental challenges as a result of the Climate Emergency and Biodiversity Crisis. Soil health is crucial to food production, meaning healthier soil would ensure greater food security. Soil is also a source of carbon storage and addressing soil erosion and degradation can help reduce the risk of flooding, as the UK faces more extreme weather due to climate change. By setting stricter standards, removing barriers and providing incentives for healthier soils, it is clear that soil can have a significant role to play in creating a better environment, reaching net zero by 2050 and achieving sustainable economic growth. This was recognised by the 2023 Environment, Food and Rural Affairs (EFRA) Committee Soil Health Inquiry to which EPF members contributed and we echo many of the inquiry's recommendations below.

Our 3 specific asks

Policyholders, with support from business, should:

- 1 **Provide a legislative framework for soil.** Ensure soil health is put on the same footing as water and air quality within government policy, through the introduction of statutory targets on soil health by 2028, improved soil monitoring data, agreed soil health indicators and widely accepted definitions of 'sustainable soil management'.
- 2 **Remove the barriers to resource efficiency.** We call for the introduction of a regulatory framework by 2035 that takes a joined-up approach to the reuse, recovery and recycling of soil. This framework should focus on preventing soil degradation and contamination across various sectors, including construction, planning, and agriculture.
- 3 **Improve governance to unlock soil's financial value.** Joined-up, evidence-based policy and practice (see priority 1) will provide an improved climate for investment in sustainable economic growth, including the growing voluntary biodiversity and carbon offset markets that will fund improved soil management.



5 | Deliver on our 30x30 commitment to reverse biodiversity decline

Urgent action is required if we are to address the Biodiversity Crisis impacting land, sea and freshwater ecosystems and the transitional areas between them. Since the 1970s the UK has experienced a 41% decline in species, the rate of which has only increased in the last decade. Our current network of statutory protected sites, made up of Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are, as was laid out in the Lawton Report, too few, too small, too isolated and in poor condition. This network covers only 11% of UK land, and even less is being actively managed for the effective restoration of our ecosystems. This network of protected areas must be bigger, better and more joined up, capable of delivering biodiversity enhancements across the UK's land, waterbodies and seas. Achieving this requires long term commitment to resourcing those bodies responsible for maintaining and improving these areas.

There is no clearer return on investment than biodiversity. Our biodiversity, and the integrity of our ecosystems is key to food supply, health and climate resilience. A thriving natural environment delivers widespread ecosystem services, without which economic growth is impossible. The EFRA Committee inquiry into Urban Green Spaces showed that in urban areas nature generates billions of pounds worth of benefits each year. Initiatives like 30x30 and BNG already offer opportunities in how we drive action forward, although progress is consistently falling short of what is required. Ensuring that clear guidance is in place, with competent professionals engaged at each stage, will guarantee that these initiatives succeed in their aims, and that the UK is able to meet its commitments to nature.

Our 3 specific asks

Policymakers, with support from business, should:

- 1 **Meet our 30x30 commitment.** Ensure that 30% of our land, freshwater and sea are effectively protected by 2030, while abiding by the principles set out in the Lawton Report.
- 2 **Ensure greater resource to ensure delivery of our 30x30 commitment.** More resources must be made available for those responsible for the long-term management of these protected areas.
- 3 **Provide guidance to ensure delivery of our 30x30 commitment.** There must be clear guidance for what land will be included in 30x30, so that more can be done through Other Effective area-based Conservation Measures (OECMs) and by land managers to achieve environmental targets.



6 | Transform the UK agricultural and food system, to secure the UK's access to sustainable sources of food

Food security, standards and sustainability are interconnected. Agricultural emissions account for 12% of the UK's GHG emissions and remain a major source of both nitrous oxide and methane emissions. Despite this, current UK policy only covers 18% of the emissions reductions needed from the sector. The Climate Emergency's impacts on water, soil, biodiversity, and weather are leading to increased food insecurity, with global yields predicted to fall by up to 30% by 2050. This is compounded by the problem of food waste, with household food waste alone at an estimated 6.4 million tonnes per year.

Transforming the UK's agricultural and food system has a clear return on investment, for public health and the environment. Dramatically reducing agricultural emissions and transforming the nation's diet will have huge benefits to public health, safeguarding the NHS and reducing impacts of the Climate Emergency. Similarly, the economic impacts will be widespread, from safeguarding food waste worth around £17 billion each year, to securing a system of farming at maximum sustainable output free from harmful subsidies. Nature-friendly farming mitigates climate change, supports adaption to extreme weather, improves water quality, and revitalises local economies, improving community resilience. Increased certainty for an environmental approach would give farmers and land managers the economic security needed to act.

Our 3 specific asks

Policymakers, with support from business, should:

- 1 Strategically deliver the UK's Food Strategy.** The Food Minister should oversee the strategic delivery of the strategy, with a mandate to ensure all food related policies work together and deliver health and environmental benefits, as well as tackle emerging issues within food safety.
- 2 Meet our food waste commitment.** Realise our commitment of halving food loss and waste throughout the system by 2030, as per targets in the United Nations Sustainable Development Goals.
- 3 Improve the resilience of our agriculture.** Increase the resilience and economic security of agriculture by expanding the Environmental Land Management (ELM) scheme rollout and committing £1 billion to sustainable agriculture.



7 | Prioritise water resilience to deliver a 'Fresh Water Future'

Our freshwater systems face numerous challenges, heightened by investment in infrastructure lagging behind the urbanisation and population growth of the past decades, and bound to worsen with climate change. ['A Fresh Water Future'](#) report found widespread water sector system and governance issues, which increase the risk of pollution events and reduce our capacity to face and adapt to our changing environment. Flooding affects an increasing number of homes, puts businesses out for months at a time and destroys crops. Various pollutants and practices are degrading all forms of water body, from the headwaters of our river systems to the sea, leading to extensive poor ecological condition. Water company performance is of great concern to both the public and professionals, concerned that governments have consistently failed to ensure enough investment in maintaining and upgrading infrastructure.

We need to build resilience to increasingly frequent droughts, storms, and floods, as well as resistance to avoid pollution events and limit their impact. Regular maintenance and upgrade of our infrastructure limits the risk of system failures that cause sewer overflows and ensuing river pollution. Re-thinking our approach and putting in place a holistic, evidence-based, and outcome-centred strategy will both reduce risks and create new opportunities to increase economic, social, and environmental value. Better water governance and management unlock various benefits ranging from public health and tourism to nature recovery, as well as helping to enhance agricultural outputs and boost housing development and economic growth more broadly.

Our 3 specific asks

Policymakers, with support from business, should:

- 1 Ensure better monitoring and reporting to create and enforce modern, achievable, and evidence-based regulations.** A National Environmental Monitoring Strategy and Programme would provide a clear picture that enables targeted, cost-effective solutions delivery and clarifies accountability.
- 2 Introduce Integrated Water Management to our cities.** A whole-systems approach should be taken to build 'sponge cities' which unlock resource regeneration, flood resilience and economic prosperity. This must consider maintenance and upgrades to ensure infrastructure is resilient to future challenges.
- 3 Harness Nature to build water resilience.** The systems approach to water management can be expanded to catchment-scale strategies, and rural areas. Reducing flood risk and increasing availability and storage of freshwater for and by agricultural land can be achieved through Nature-based Solutions (NbS), such as on-farm wetlands, and by improving soil health.



8 | Increase ambitions and holistic action for a country with cleaner air

The current UK Government acknowledges that “poor air quality is the largest environmental risk to public health”, contributing towards between 29,000 and 43,000 deaths a year in the UK. The key pollutants driving poor health outcomes in the UK are fine particulate matter (PM2.5) which the World Health Organisation (WHO) has linked to strokes, heart diseases, lung cancer, and respiratory diseases. Recent research shows that every new school being built in England exceeds at least one of three key WHO air quality guidelines on PM2.5, PM10 and NO2 and 86% exceed all three. At the same time, people spend as much as 90% of their time indoors, so indoor air quality needs an increased focus. Whilst the Clean Air Strategy and revised Air Quality Strategy both acknowledge indoor air, the UK continues to lack a single holistic approach to indoor and ambient air and the shift away from the 2011 joint Air Quality Strategy has opened the door to divergence between the UK devolved nations.

There are clear economic and human benefits to addressing air quality. The health impacts cost the UK economy more than £20billion every year and are unequally distributed, contributing to significant economic insecurity. Addressing the causes of air pollution often has positive effects on reducing carbon emissions and supporting biodiversity. Consolidating the broad yet fragmented UK air quality policy framework would make it more holistic and ambitious, unlocking those benefits.

The WHO’s guideline for annual average concentrations of PM2.5 is five micrograms/m³, which is half the level of England’s current target. Even well below the targeted level, those exposed to PM2.5 face health risks, and the faster concentrations are lowered, the better the outcomes for public health. Addressing air quality from a holistic perspective could also better align the UK with global approaches, avoiding transboundary environmental harms and improving the UK’s leadership position on environmental issues.

Our 3 specific asks

Policymakers, with support from business, should:

- 1** **Raise the ambition of its legally binding PM2.5 targets.** This should involve aiming to reach an annual mean concentration of 10 micrograms per cubic metre across England by 2030 and aiming to reduce population exposure by at least 35% by 2035.
- 2** **Expand regulation of the sale and use of domestic solid fuel burners in England.** This should apply to urban areas where there are on-grid heating alternatives.
- 3** **Deliver a holistic policy approach to reducing indoor and ambient air pollution.** This should be achieved in partnership with the devolved administrations, encompassing all sources of emissions (industrial, agricultural, transport, and domestic).



9 | Deliver a truly circular economy

The transition away from a wasteful 'take-make-use-lose' economic model to one that keeps resources in use at as high a value, for as long as possible, restoring natural systems and eliminating waste, will be essential to sustain our modern way of life and address many of the challenges society faces. Treating all waste as potential resources, including soil, nutrients, and water, as well as typical raw materials, unlocks economic opportunities and can help us solve pollution and scarcity issues.

Transitioning to a more circular, resource efficient economy offers clear environmental, competitiveness and economic security benefits. Circular strategies harness more value from materials and products throughout their lifecycle creating jobs, boosting economic growth, improving the resilience of supply chains, reducing emissions and saving costs that come with addressing environmental harm. With growing pressures on resources, security and the environment, the need to act urgently is clear.

Our 3 specific asks

Policymakers, with support from business, should:

- 1 Publish a UK materials strategy.** A cross-government, cross-economy strategic approach to sustainable use and management of materials is required, to ensure supply chain resilience and secure access to the materials and minerals required for modern society and delivering net-zero. This should include developing access to accurate and transparent information, such as material flow data to support secondary markets.
- 2 Advance resource efficiency.** Support development and deployment of products, technologies, systems, infrastructure, and skills, for the circular economy including through incorporation into government procurement standards.
- 3 Incentivise sustainable choices.** Employ measures to better reflect full lifecycle economic and environmental impacts, for example by adjusting VAT rates on repair services, and maintaining momentum and delivery of Extended Producer Responsibility for Packaging via an effective fee modulation mechanism.



10

Unlock investment in low carbon technologies to deliver net zero

We are facing a Climate Emergency, a fact recognised in the UK's commitment to achieve net zero by 2050. However, this commitment means little without the clear roadmap and delivery plans to back it up. Analysing progress made to date, [the Climate Change Committee \(CCC\) have found](#) that the UK isn't on track to meet this commitment. [Green Alliance's 2024 report](#) had similar findings, citing particularly strong policy gaps within the heat, building and transport sectors (notably, transport making up 70 per cent of the overall policy gap), with the required shift to low carbon technologies not taking place at anything like the pace or scale needed. The need for rapid investment in these industries is essential, with low carbon technology policies in other countries meaning investment that could be taking place in the UK is occurring elsewhere.

As noted throughout this document (especially priority 2), there are enormous benefits attached to the shift to a green, low carbon economy. Described by the [Skidmore review](#) as "the economic growth opportunity of the twenty-first century", the UK is currently missing out on many of these opportunities to achieve sustainable economic growth. Low carbon technologies are developing fast and will need to shape the UK economy of the future, but the investment climate in the UK has to be attractive to these industries and compete with policies on offer elsewhere, including the United States' programme of clean technology subsidies and the EU's Green Deal Industrial Plan. Our three specific asks for achieving this shift are below and are aligned with the recommendations of the Skidmore Review.

Our 3 specific asks

Policymakers, with support from business, should:

- 1 Establish a Net Zero Delivery Body.** This independent body is needed to provide a joined-up approach to policy delivery in this area, ensuring much needed scrutiny of progress. This body, alongside government, should regularly engage with professionals and practitioners as well as industry to inform delivery.
- 2 Invest in quality transport infrastructure.** This includes improving the availability and affordability of public transport and rapidly expanding the infrastructure needed to support the transition to low-emission vehicles.
- 3 Unlock the benefits of onshore wind.** Provide clarity and direction to onshore wind development, through the creation of a dedicated investment and deployment roadmap.



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