

Consultation response: Biodiversity Offsetting in England

7th November 2013

Summary

The Aldersgate Group believes that the most important goal in this area is biodiversity protection and enhancement, making offsetting an appropriate tool to help with wildlife conservation objectives in England, providing it is structured appropriately to ensure no dilution of existing protection and the system is robust and mandatory.

Current levels of understanding of biodiversity offsetting in our membership and wider society, while increasing, have a low starting point. Aldersgate Group members consequently believe that if biodiversity offsetting is to be used then some time is needed to design an effective system and such a system should be based on a mandatory requirement to offset residual impacts on biodiversity to achieve no net loss and preferably a net gain.

The right conditions for an offsets market that helps wildlife and business include:

- not weakening current objectives to protect biodiversity
- maintaining the mitigation hierarchy, using offsets only for residual damage to biodiversity
- the presence of an independent regulator
- effective and transparent monitoring, reporting and verification processes
- legal clarity on property rights and financial responsibilities
- rules (eg metrics) that are understood by stakeholders and technically fit for purpose

Background

The Aldersgate Group is an alliance of leaders from business, politics and society that drives action for a sustainable economy. Its mission is to trigger the change in policy required to address environmental challenges effectively and secure the maximum economic benefit in terms of sustainable growth, jobs and competitiveness.

The views expressed in this document can only be attributed to the Aldersgate Group and not to individual members.

Aldersgate Group believes that loss of biodiversity causes ecosystems to stress, degrade or even collapse altogether. This reduces the ability of the environment to provide the goods and services that nature provides for free, such as clean air, water, soils and waste disposal, as well as the raw materials that industry depends upon. As a result, it is evident that the protection of biodiversity and ecosystem services, while complex to value and quantify accurately, is essential for future wellbeing and economic development.

In November 2011 the Aldersgate Group published a report, *Pricing the Priceless*, which made the business case for action on biodiversity. In 2012-2013 Aldersgate Group Chairman, Peter Young, was a member of the Ecosystem Markets Task Force, which published its findings in March 2013, showing that business is often unaware of its true reliance on nature and if new ways of looking at nature were developed, it would stimulate innovation and mitigate risk.

The Aldersgate Group believes that regulation has a role in increasing competitiveness and early innovation. Smart regulation corrects market failures, promotes fairness, protects the environment and thus protects the elements upon which commercial profitability rests.

To prepare the response to this consultation, the Aldersgate Group convened a roundtable on 21st October 2013. Attendees included developers, utilities, environmental consultants and civil society representatives. Discussions were held under The Chatham House Rule and comments in this consultation cannot be attributed to any one attendee, although their views have shaped the response. The full list of attendees can be found in Annex 1 below.

Consultation

Question 1: Do you think the Government should introduce a biodiversity offsetting system in England?

Biodiversity offsets can be an appropriate tool to help with wildlife conservation objectives in England under certain conditions. However, current levels of understanding of biodiversity offsetting in our membership and wider society, while increasing, have a low starting point. Therefore Aldersgate Group members believe that if biodiversity offsetting is to be used then some time is needed to design an effective system, and that such a system should be based on a mandatory requirement to offset residual impacts on biodiversity to achieve no net loss or potentially net gain. The time needed to design an effective system could be spent undertaking a more effective mandatory pilot phase, and/or including a policy iteration to include lessons from early implementation. The iterative design of this policy should be guided by a policy strategy for achieving no net loss of biodiversity.

Transparency around biodiversity offsetting will be key. We recommend that all details about a biodiversity offset, including an independent audit but not including the cost, should be made publicly available. The aim will be to facilitate monitoring and also scrutiny by the media and civil society.

Offsetting must be treated as a last resort; the final step in the mitigation hierarchy. Offsetting should be preceded by avoidance and mitigation on site. Offsets, and the preceding steps in the mitigation hierarchy, should be supported by monitoring, verification and reporting systems.

On the issue of timing, given the complexity of the area, the range of learnings that can be drawn from other areas and the diversity of stakeholders who will be affected by the policy, due consideration should be given to designing the scheme that deals sufficiently with the complexity without unduly delaying implementation and that once implemented can develop iteratively over a period of time.

Question 2: Do you think the Government's objectives for the system and the characteristics the Government thinks a system would display are right?

The long-term aim of a biodiversity offsets system in England should be net positive impact on biodiversity, in line with the principles of the Lawton Review, rather than no net loss. As well as increasing the condition of ecosystems, offsetting should aim to allow developers to use existing land more effectively. It can potentially create a large market.

We see the need for further work on the right conditions for biodiversity offsets to work well. At present, and in line with Aldersgate Group principles, we think that the right conditions for an offsets market that helps wildlife and business include:

- not weakening current objectives to protect biodiversity
- maintaining the mitigation hierarchy, using offsets only for residual damage to biodiversity
- finding ways of getting more development into the application site so that further Greenfield sites are not required
- the presence of an independent regulator
- effective and transparent monitoring, reporting and verification processes
- legal clarity on property rights and financial responsibilities
- rules (e.g. metrics) that are understood by stakeholders and technically fit for purpose

Regulation of large projects in England tends to be captured by the Birds and Habitats Directives, which biodiversity offsetting should not duplicate. We recommend that biodiversity offsetting be designed to capture a broad spectrum of projects including small impacts, which thus far have largely been ignored. This should help to address the long-term, underlying causes of loss of biodiversity as a result of development.

Question 3: Do you think it is appropriate to base an offsetting system on the pilot metric? If not is there an alternative metric that should be used?

We welcome the existing metric as a starting point but there are three key omissions:

- 1) species of concern
- 2) species movement
- 3) landscape and connectivity

Government should also review three assumptions that underpin the metric.

Firstly upper limits or thresholds are referenced but the language is ambiguous and must be tightened. There is an upper limit beyond which impacts on biodiversity cannot be offset. The most dramatic example of a non-offsettable impact is the extinction of a species. Furthermore, larger projects and better quality ecosystems tend to be protected already by existing legislation, so biodiversity offsetting should seek to cover the lower quality, lower profile, smaller areas which tend to be overlooked.

Secondly there should be some degree of common substitutability provided, as not every type of biodiversity can be exchanged for something else. The policy needs a gearing mechanism to provide the principle of like for like and better.

Thirdly, the green paper describes implementation inadequately. Conservation covenants and the Law Commission's work is referenced, but there are basic questions which are not covered such as: who can deliver offsets, what rules should they follow, where and how can this be done, can offset provision be permit-led, what is the role of *in lieu* fees, what is the role of conservation banking, can liability be transferred to third parties, how should participants be insured, can administrative processes be streamlined, can small impacts be more swiftly covered than larger impacts, and what is the role of the authorities?

While the Aldersgate Group supports biodiversity offsetting in theory, this is conditional

upon these three areas being developed appropriately and we anticipate further work will be required.

Question 4: If you think the pilot metric is the right basis for an offsetting system:

- **Are there any other factors which should be considered when quantifying biodiversity loss and gain?**
- **Are the weights given to the different factors appropriate?**
- **Are there any other changes you think should be taken into account?**

We welcome the existing metric as a starting point but there are three key omissions:

- 1) species of concern
- 2) species movement
- 3) landscape and connectivity (in line with the Lawton Review)

The Government should also review three assumptions that underpin the metric.

Firstly upper limits or thresholds are referenced but the language is ambiguous and must be tightened. There is an upper limit beyond which impacts on biodiversity cannot be offset. The most dramatic example of a non-offsettable impact is the extinction of a species. While the Green Paper alludes to potential upper limits and requests suggestions as to what they might be, it does not yet set out a cogent basis for determining them, and this needs to be developed in the next stage of Defra's work. Furthermore, larger projects and better quality ecosystems tend to be protected already by existing legislation, so biodiversity offsetting should seek to cover impacts on the lower quality, lower profile, smaller areas which tend to be overlooked.

Secondly there should be some guidance on the degree to which there are limits on substitutability (ie clear exchange rules), as not every type of biodiversity can be exchanged for something else. The policy needs a gearing mechanism to provide guidance on how to apply the principle of "like for like or better".

Thirdly, the green paper describes implementation inadequately. Conservation covenants and the Law Commission's work is referenced, but there are basic questions which are not covered such as: who can deliver offsets, what rules should they follow, where and how can this be done, can offset provision be permit-led, what (if any) is the role of *in lieu* fees, what is the role of conservation banking, can liability be transferred to third parties, how should participants be insured, can administrative processes be streamlined, can small impacts be more swiftly covered than larger impacts, and what is the role of the authorities?

While the Aldersgate Group supports biodiversity offsetting in theory, this is conditional upon these three areas being developed appropriately where we anticipate further work to be required.

We also urge Government to contextualise biodiversity offsetting within the current policy landscape. This green paper is remarkable for mentioning none of the Government's current policies on biodiversity, some of which (such as Biodiversity 2020) may contain solutions to some of the issues flagged in the consultation. Existing tools for biodiversity (eg how to complement existing protected areas) and in the planning system (eg local area plans) should also be referenced.

Question 5: Do you think offsetting assessment should be used when preparing a planning application for a project?

The metrics used in the offsetting assessment should be used when preparing a planning application to effectively measure biodiversity loss, regardless of whether offsets are actually used. It is important that there is no presumption towards offsetting at the outset, rather than following the hierarchy process. Offsetting must be treated as a last resort; the final step in the mitigation hierarchy. Offsetting should be preceded by avoidance and mitigation on site and once implemented, should be supported by monitoring, verification and reporting systems.

It is unclear whether it is the Planning Authority or the Developer that would be responsible for conducting a biodiversity value assessment of the proposed development area. To maintain a level of independence and transparency, the Planning Authority must be responsible for ensuring an accurate assessment has been made of the biodiversity value of land being developed. Responsibility for conducting the assessment in detail should rest with the developer. It would be helpful for planning authorities to make some assessment of the biodiversity value of any and all proposed development areas within their region. This information should then be made available to Developers prior to elaborating a planning application so that Developers can better plan to follow the mitigation hierarchy, and any requisite biodiversity offsets are included in their planning. Under those circumstances, we support the use of an offsetting assessment being used when Developers are preparing a planning application for a project.

Question 6: Do you agree that it should be the responsibility of planning authorities to ensure the mitigation hierarchy is observed and decide what offset is required to compensate for any residual loss? If not, why, and how do you think offsetting should be approached in the planning system?

There is an issue for our members to be able to trust any offsets policy to improve the status of biodiversity in England given the Government's prioritisation of growth of GDP as its overriding objective. This is particularly true given the recent changes to the planning system, the results of which for biodiversity are largely untested. However, actions can be taken to build that trust, such as ensuring there is an independent regulator of offsets activity with a duty (rather than just relevant powers) to carry out its functions, which may include randomised evaluation and verification of developments calculated offsets.

We are also concerned that the majority of local authorities (60-70%) do not have the relevant ecological expertise available to make decisions on offsetting, which raises the question of who will undertake the assessments, monitoring, verification and reporting. The Environment Agency and Natural England struggle to provide the functions already allocated to them within current budgets, so careful consideration must be given to increasing their responsibilities to cover roles in an offsetting system. We are concerned that significant loss of biodiversity has not, in the past, been sufficient to prevent local authorities from granting planning permission.

We foresee a role for independent assessors, based on the system by which independent consultants undertake environmental impact assessments (EIA). However the skill sets for EIA and the design and implementation of biodiversity offsets is distinct and an accreditation system will be required to help competent people fulfil the assessment, implementation and monitoring functions involved in biodiversity offsetting.

The conservation objectives of biodiversity offsets may conflict at a local level with other ecosystem services (such as recreation or regulating surface water drainage). Offsets

can be designed to take these services into account, so as to achieve no net loss not only of biodiversity but of certain ecosystem services, but doing so requires more complexity. At present, retaining an optimum value of these ecosystem services should remain the responsibility of existing organisations in the planning system.

Question 7: Do you think biodiversity offsetting should have a role in all development consent regimes?

Biodiversity offsetting should have a role in all development regimes and it is important to have one consistent approach across all planning regimes throughout England.

Question 8: Do you think developers should be able to choose whether to use offsetting? If so what steps could Government take to encourage developers to use offsetting?

If biodiversity offsetting is to be done properly it must be mandatory to create a level playing field and drive uptake. The system should provide an objective approach and a recognised and transparent system that allows it to be audited, demonstrating clear benefits to all parties.

Question 9: If you think developers should be required to use offsetting do you think this requirement should only apply above a threshold based on the size of the development? What level should the threshold be?

We agree that there should be a threshold in this respect. The threshold should be based on the biodiversity assessment (i.e. the significance of the biodiversity being lost), not the cost or the size of the development.

Question 10: Do you think there should be constraints on where offsets can be located? If so what constraints do you think should be put in place?

There should be no constraints as to where offsets can be located.

We suggest that issues like ecosystem services and amenity value should be considered at a local level, but issues such as critically endangered species can “float” geographically and be placed in the landscape where they can have connectivity and the benefits prioritised by the Lawton Review. Local issues should therefore be kept distinct from national issues. This tension between local and national priorities is discussed further under Question 25.

Question 11: Do you have any comments on the analysis set out in the impact assessment?

The green paper voices the intention that offsets should be simple and no additional cost to the developer. We doubt this is feasible. If the system is to be robust and address damage to biodiversity from development so as to achieve the White Paper objectives, it is unlikely to be simple. Any system that tackles this issue effectively will create additional cost in administration and transaction costs, but these costs will be worth it if development is to proceed without creating environmental damage, which has hitherto not been the case.

It is however believed that the additional costs associated with the implementation of offsets might be mitigated by benefits associated with improved certainty and reduced

delays for planning and further evidence might be sought to determine if this is correct.

Question 12: Do you have evidence that would help refine the Government's analysis of the costs and benefits of the options considered in this paper? In particular, evidence relating to:

- **The amount of compensation already occurring where there is residual biodiversity loss which cannot be avoided or adequately mitigated**
- **The method for estimating costs and their magnitude**
- **The method for estimating benefits and savings and their magnitude**
- **How to capture the wider social and environmental benefits of maintaining England's stock of biodiversity and delivering a coherent ecological network**
- **Likely take up of offsetting under a permissive approach**

If biodiversity offsetting is to be done properly it must be mandatory to create a level playing field and drive uptake. The system should provide an objective approach, and be a recognised and transparent system that allows it to be audited, demonstrating clear benefits to all parties.

While on average offsets may have minimal additional net costs, there will be instances, in line with the polluter pays principle, where developers do face additional costs. This is a necessary part of an efficient offsets system: developments creating greater biodiversity damage should face higher costs, to incentivise avoidance of that damage.

Question 13: Do you think offsetting should be a single consistent national system without scope for local variation?

We suggest that local issues like ecosystem services and amenity value should be considered at a local level but issues such as critically endangered species can “float” geographically and be placed in the landscape where they can have connectivity and the benefits prioritised by the Lawton Review. Local issues should therefore be kept distinct from national issues. This tension between local and national priorities is discussed further under Question 25.

Most local authorities already have strategies for issues like ecology, flood risk or blue infrastructure, which suggests that a national system would be more acceptable locally if the offsets are also created locally, providing they satisfy the methodologies such as metrics and exchange rules set out to achieve no net loss. This would be politically more appealing to the members of the planning council who would see creation of greater biodiversity in their own area. Existing green strategies mean there is an existing ecological network, which could provide some of the support to identify where offsets should be.

Question 14: Do you agree with the proposed exceptions to the routine use of biodiversity offsetting? If not, why not? If you suggest additional restriction, why are they needed?

Habitats that cannot be recreated within a reasonable timeframe, such as limestone pavement, ancient woodland, as well as protected species, must be afforded protection and so we agree with the proposed exceptions as stated.

However, we disagree with the relaxation caveat in para 31; biodiversity offsetting must be carefully tracked to ensure commitments made are delivered and sustained in the

long-term, often with long programmed improvements to habitat for biodiversity over successive generations. We recognise that the market position will be a key factor in determining if the funding requirement should be in perpetuity or if it would be necessary to limit to 25 years. However, this funding timescale should be distinguished from the timescales over which the property rights over the land where the offset is created are secured – this should be as long term as possible.

Question 15: Which habitats do you think should be considered irreplaceable?

There is no clear legal definition for “irreplaceable habitat”, however, we would consider it to be best defined as healthy and well-functioning habitat that cannot be replaced in similar quantity and/or quality within an acceptable time period or equivalent location, or activity which involves an unacceptable level of risk or uncertainty to recreation of habitat.

Question 16: Do you think offsetting should in principle be applied to protected species?

In principle, yes, provided the protection level afforded to them is not reduced and a precautionary approach is taken.

Question 17: Has the Government identified the right constraints and features that need to be addressed when applying offsetting to protected species?

The single biggest cause of failure for achieving no net loss around the world, is lack of monitoring, evaluation and enforcement. This green paper contains significant omissions in these areas.

Question 18: Do you agree that great crested newts should be the first area of focus?

One issue frequently encountered by developers revolves around the prohibitive costs associated with the mitigation of impacts upon certain protected species (eg Great Crested Newts (GCNs)). Developers often pay large sums to erect reptile fencing / translocate small numbers of GCNs when these costs would be better allocated to the off-site creation of larger and better habitats for these protected species, i.e. the creation of better and more sustainable population habitats for protected species rather than the protection of small numbers of individuals in a population of protected species.

Question 19: Do you have any comments on the Government’s thinking on how to apply offsetting to great crested newts?

The Government’s proposed approach appears to favour population protection / enhancement rather than individual protection / enhancement. This approach is supported as it is preferred commercially and also provides for more sustainable GCN habitats and hence conservation status. However, Government must avoid the risk of population isolation through habitat fragmentation. Government could work with the European Commission to explore whether studies could enable no net loss at the metapopulation level rather than at the level of individual animals.

Question 20: Should offsetting be considered for any other species in the near future taking account of the constraints on species offsetting?

The focus should be on habitat, for example pond loss, rather than on species alone, as

good habitat supports a breadth of species. However, there is a need for a prioritised list of species that need specific consideration because impacts on them are not adequately reflected through metrics looking at habitat condition.

Question 21: Do you think conservation covenants should be put in place as part of an offsetting system? If they are required, who do you think should be responsible for agreeing conservation covenants? If not, how else do you think offsets could be secured for the long-term?

Yes, a mechanism that secures the long-term property rights of the offset is required.

Question 22: Do you think management agreements should be put in place as part of an offsetting system? If they are required, who do you think should be responsible for agreeing management agreements?

Yes they should be put in place. The requirement on a developer to offset should include responsibility for appropriate management of the offset. However, the developer would be able/expected to discharge this responsibility to the offsetter on purchase of the offset. An independent regulator is needed to oversee the delivery of the management plan.

Question 23: Do you think an offset register should be put in place as part of an offsetting system? If so, who do you think should be responsible for maintaining an offset register?

Yes, to aid transparency and avoid double counting.

Question 24: How long should offsets be secured for?

The property rights for the offset should be secured as long as possible – 25 or more years. Payments for undertaking offset activities could be for a shorter period of time.

Question 25: Are there any long-term factors, besides climate change, that should be taken into account when securing offsets?

Biodiversity offsets can conflict at a local level with other ecosystem services (such as recreation or regulating surface water drainage). Offsets can be designed to take these services into account, but doing so requires more complexity, for instance, composite offsets. At present, retaining the value of these ecosystem services should remain the responsibility of existing functions in the planning system.

Government should consider use of the site where biodiversity has been created; if the biodiversity in question is sufficiently robust, the site could also be amenable for other uses, such as recreation (subject to it not disturbing the very wildlife/biodiversity that has been created) and sustainable drainage. This could feed into an ecosystems services approach and would encourage community buy-in. However incorporating an ecosystems services approach would add complexity to this policy.

Local people value green spaces through a sense of space and cultural amenity. If that green space is moved out of town and the in-town space built on, the biodiversity will have been offset but the amenity value lost. The solution might be to plan and implement composite offsets, with different outcomes delivered in different places, adding up to a net gain. Working closely with local people is essential to plan an acceptable outcome. Local priorities may focus more on green space and amenity value rather than

biodiversity, risking more football pitches and less biodiversity unless approaches such as composite offsets are used.

Question 26: Do you think biodiversity offsetting should be "backdated" so it can apply in relation to any planning applications under consideration at the point it is introduced?

It is important that the timing of introduction of offsetting does not allow a rush of planning applications to avoid compliance.

Question 27: Do you think an offsetting system should take a national approach to the question of significant harm and if so how?

Guidelines are needed for a nationally consistent interpretation of 'significant' harm. However, assessment of 'significant harm' should not create excessive transactions costs nor allow small but cumulatively significant impacts to avoid offsetting.

Question 28: Do you think any additional mechanisms need to be put in place to secure offsets beyond conservation covenants? If so why and what are they? If this includes measures not listed above, please explain what they are.

Yes, insurance against failure to deliver offsets over a significant size (say costing >£1million).

Question 29: Do you think there should be constraints on what habitat can be provided as an offset? If so what constraints do you think should be put in place, and how should they work in practice?

Yes, approach should be like for like or better and should respect limits to what cannot be offset. It should be in line with the BAP and HAP for the local authorities, ensuring that the investment in habitat enhances indigenous need.

Question 30: Do you agree an offsetting system should apply a strategic approach to generate net ecological gain in line with Making Space for Nature? If so, at what level should the strategy be set and who by? How should the system ensure compliance with the strategy?

We believe that the aim of offsets at this point should be no net loss, not net gain and that net gain should be the next step for biodiversity offsets, once the system has been set up. In the interim, the means by which no net loss is ensured would be to set the offset at a slightly higher level than the original damages, to take account of the risk that the compensation may not work as well as intended. This is facilitated by the metric which has a range of multipliers to capture these risks. A priority for introducing requirements for net gain should be in relation to larger developments and those affecting higher biodiversity-value habitats (amongst those habitats for which offsetting is appropriate).

Net gain is a positive objective for society and the planning system should play a role in assisting it. Net gain could be measured through connectivity at a national level, meaning the greater costs would be associated with planning and administration, rather than buying more expensive offsets.

Net gain should be 'step two' for biodiversity offsets, because effectively it will ask

today's developers to tackle historical biodiversity losses, which raises questions of responsibility and creates additional layers of complexity. It also raises the possibility that a local authority might be more inclined to approve a development because of the prospect of net gain, which might potentially undermine the mitigation hierarchy.

Question 31: Do you think habitat banking should be allowed? Do you think a provider must show intent to create a habitat bank to be allowed to sell it as an offset? Do you think habitat banks should be “retired” if they are not used to provide an offset? If so, after how long?

Habitat banking should be permitted as long as the intent can be corroborated that an offset has been created, recreated or restored and the developer at the impact site is obliged to follow the mitigation hierarchy adequately before purchasing credits from a habitat bank. If the intent to create, recreate or restore an offset has been corroborated the provider should be rewarded, irrespective of timescales, for their efforts that may have incurred financial costs ie, if their efforts are not rewarded and are “retired” then this presents a significant disincentive to future creation / restoration of biodiversity offsets.

Question 32: Do you think maintaining an environmental gain that might otherwise be lost should count as an offset? If so, how should a value be attached to the offset?

No, because serious threats to the UK's biodiversity should be controlled by government policy and therefore the 'declining baseline' required should not exist.

Question 33: Do you think it is acceptable or not to use biodiversity gain created for other purposes as an offset? If you do, how should it be decided what is allowed to be used as an offset?

No, not if the gain is not additional ie an offset site must be one on which a landowner, farmer or conservation body, can demonstrate full additionality as measured by the application of the metric to determine the uplift available. An exception might be if the gain is an accidental by-product of another activity.

Question 34: How do you think the quality of assessments should be assured and who by?

Yes, by an independent regulator with a duty to oversee effective assessments.

Question 35: How should differences of opinion over assessments be addressed?

Through an independent panel of experts, which could also be useful to guide development of offsets policy.

Question 37: Do you think it should be possible to offset the loss of hedgerows by creating or restoring another form of habitat?

No. Loss of hedgerow habitat should be replaced by the same form of habitat to protect valuable bio-corridors. Hedgerow habitat must be maintained as recognised habitat and for biodiversity.

Annex 1

Attendees at the Aldersgate Group's roundtable to discuss Defra's consultation on biodiversity offsetting in England were:

Chris Gerrard, Anglian Water, Climate Change and Biodiversity Manager
Julia Griffin, B&Q, Sustainability Manager
Elizabeth Ness, Crest Nicholson, Group Sustainability Executive
Diliana Karailieva, Dalkia UK & Ireland, Head of Business Development Support
Ian Dickie, eftec, Senior Consultant
Kerry ten Kate, Forest Trends, Director of Business and Biodiversity Offsets Programme
Pat Snowdon, Forestry Commission, Head of Economics and Climate Change
Paul de Zylva, Friends of the Earth, Head of Environment
Louise Moore, Herbert Smith Freehills, Partner
Lynda Simmons, MITIE, Head of Sustainability
Ian Glover, National Grid, Knowledge and Environmental Standards Manager
Adam Dutton, RSPB, Economist for Conservation Policy
Cathy Purse, Thames Water, Biodiversity Team Manager
Natalia Ford, UK GBC, Programmes & Policy Assistant
Rob Lambe, Wilmott Dixon, Managing Director
Frances Winder, Woodland Trust, Conservation Policy Adviser
Rossa Donovan, WSP Environmental, Director of Ecological Services
Toby Roxburgh, WWF, Economics Adviser

Jemma de Leon, Aldersgate Group, Communications Manager
Oliver Dudok van Heel, Aldersgate Group, Director
Victoria Fleming-Williams, Aldersgate Group, Policy Officer