


Business Bulletin

Policy and Sustainability Committee

10.00am, Friday 15, December 2023

Virtual Meeting - Microsoft Teams

Policy and Sustainability Committee

Convener:	Members:	Contact:
<p>Convener: Councillor Cammy Day</p> 	<p>Councillor Cammy Day (Convener) Councillor Danny Aston Councillor Alan Beal Councillor Fiona Bennett Councillor Marco Biagi Councillor Kate Campbell Councillor Sanne Dijkstra-Downie Councillor Phil Doggart Councillor Kevin Lang Councillor Lesley Macinnes Councillor Adam McVey Councillor Jane Meagher Councillor Claire Miller Councillor Alys Mumford Councillor Ben Parker Councillor Mandy Watt Councillor Iain Whyte</p>	<p>Jamie Macrae, Committee Officer</p> <p>Jacqueline Boyle, Assistant Committee Officer</p>

Recent News	Background
<p><u>LGBF Sustainability Indicators Update</u></p> <p>The LGBF board has agreed to include the following measures into the LGBF dataset:</p> <ul style="list-style-type: none"> • Emissions from Transport per Capita • Emissions from Electricity per Capita • Emissions from Natural Gas per Capita <p>These are all measures in the Public Bodies Climate Change Reports (submitted by all local authorities on an annual basis). The Improvement Service (who collate and release the LGBF dataset) are now working to add these measures into the dataset in time for the first data release of the 22/23 dataset (expected early 2024). We will include these measures in our reporting when the data becomes available.</p> <p>Family group assignment</p> <p>The current sustainability measures are reported against the demographic rather than the deprivation family group. The rationale behind this is that analysis, completed by the Improvement Service as part of adding these measures, showed a clearer relationship with geography, with rural authorities reporting significantly higher CO2 emissions. This rationale still stands and so these measures will continue to be shown against the demographic family group in the national reporting of the LGBF data.</p> <p>However, we can do the calculations locally to show these measures against the deprivation family group. We will include this additional analysis so the climate change measures will be shown against both demographic and deprivation family groups as part of our next LGBF reports to committee.</p>	<p><u>Contact</u></p> <p>Catherine Stewart, Lead Change and Delivery Officer Corporate Services</p>
<p><u>Scottish Government Consultation on the Scottish Biodiversity Strategy</u></p> <p>This Scottish Government consultation is seeking views on a range of topics and proposals related to biodiversity and tackling the nature emergency in Scotland.</p> <p>It covers three parts of the Biodiversity Strategic Framework:</p> <ol style="list-style-type: none"> 1. The Scottish Biodiversity Strategy which sets out the 	<p><u>Contact</u></p> <p>Caroline Peacock, Biodiversity Officer, Place</p>

vision to halt and reverse biodiversity loss;

2. The first five-year Delivery Plan which contains the actions to deliver the vision; and
3. The proposed Natural Environment Bill which will provide a framework for establishing statutory nature targets to drive delivery and the transformational change we need.

The consultation document is set out in two parts. Part A is consulting on the final draft of the Scottish Biodiversity Strategy, the first five-year Delivery Plan, and policy frameworks for Nature Networks and protecting at least 30% of our lands and seas by 2030 (30 by 30).

Part B of the consultation seeks views on proposals related to tackling the nature emergency that will require legislation, specifically statutory targets for nature restoration and changes to National Parks legislation.

The Council's response to the consultation (attached as an appendix) is broadly supportive of the aims within the latest iteration of the Strategy. However, the response identifies a need for the Delivery Plans to better reflect the significant amount of work being delivered at a local level by Local Authorities and Local Biodiversity Partnerships. This includes protecting important sites through the Local Nature Conservation Sites system, activity on important habitat types not mentioned in the strategy and creating mechanisms to prevent habitat loss outside of designated sites. It also:

- Seeks clarity on the first five-year delivery plan, in particular on who the lead agencies are responsible for delivering each element;
- Highlights that Local Authorities are well placed to respond to the nature emergency as Planning Authorities and land managers, but recognises there are challenges of capacity and resource constraints;
- Recommends that nature restoration activity should be informed by local as well as national priorities; and
- Recommends that the value of urban greenspace and green networks is recognised in responding to the nature and climate emergencies.

The Edinburgh Biodiversity Partnership have input to the consultation response and responded from within their own

organisations.

Direct Payment (DP) Policy and Procedure

During the Policy and Sustainability Committee in June 2023, EHSCP committed to developing a Direct Payment (DP) Policy and Procedure to provide clarity on the process for reclaiming unspent DP funds. At the same time Children, Education and Justice Services had an internal audit and the recommendation was to update a Self-Directed Support (SDS) Policy with EHSCP. Direct Payment is a component of this policy and other associated actions as part of the Internal Audit action.

However, there was no Self-directed support policy, and this needed a full policy development across EHSCP and Childrens Services with stakeholder engagement, IIA and training for staff to incorporate the government legislation and practice framework – a much larger piece of work than the audit action implied. EHSCP are a key stakeholder of the SDS Policy and will support its development with Childrens Services, ensuring consultation with members of the public and relevant council officers. Revised timescales have been agreed with Internal Audit. We plan to take a draft Policy and Practice framework to an engagement event on 6 December 2023 with an Integrated Impact Assessment taking place in January 2024.

Quality assurance tools have been created and will be used once all relevant colleagues have received training to be able to deliver in line with government legislation and the SDS practice framework.

Contact:

[Mike Massaro-Mallinson](#),
Strategic Programme
Manager,
Strategic Planning &
Modernisation

Forthcoming activities:

Respondent Information Form



Tackling the Nature Emergency - Consultation on Scotland's Strategic Framework for Biodiversity

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy: <https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

City of Edinburgh Council

Phone number

Address

Waverley Court, 4 East Market Street, Edinburgh

Postcode

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
 Publish response only (without name)
 Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

No

Tackling the Nature Emergency: Consultation on Scotland's Strategic Framework for Biodiversity

Questions

We are inviting responses to this consultation by **14 December 2023**.

You are not required to answer every question in the consultation. The consultation is set out in sections to help you identify matters in which you may have a particular interest.

Please note that Section 1 of the consultation document does not contain any questions, so question numbering starts from Section 2.

Section 2 – Scottish Biodiversity Delivery Plan

Question 2a: Have we captured the key actions needed to deliver the objective: accelerate restoration and regeneration?

- Yes
- No **NO**
- Unsure

Please explain the reasons for your response:

...

The ambition to accelerate restoration and regeneration is supported. The actions as set out are also broadly supported, with additional suggestions set out here. However, there are significant gaps, examples of these are commented on below.

As an overarching comment, the draft Delivery plan and actions have been published without an indication of who lead agencies and delivery partners are. This makes it difficult to fully respond and comment on the proposals from a Local Authority perspective. Clarity on this is required when the plans are finalised and published to ensure effective delivery.

As land managers, Planning authorities and Local Biodiversity Partnership lead organisations, Local Authorities are well placed to support the aims for protection, restoration and regeneration of biodiversity.

There is a significant amount of Local Biodiversity Partnership working across Scotland, informed by national and local priorities. This is poorly reflected in the draft delivery plan and should be addressed. Direct engagement with the Scottish Local Biodiversity Network stakeholder group is required to ensure optimal implementation of finalised delivery plans across the country. The group has representation for all local authority and National Park areas in Scotland and a

wealth of experience and insight on what is required to enable successful local delivery.

There are no proposals included in the Delivery Plans on how to prevent further biodiversity loss through habitat loss, degradation and fragmentation. The policy framework around development has been strengthened in NPF4, but there also needs to be a robust regulatory framework to prevent habitat loss which is not associated with development. For example, there are regulations around felling licences which help to prevent uncontrolled woodland removal. Outside of designated sites, there are no such controls to prevent removal of other important habitats in the wider landscape. Without addressing this, biodiversity loss will continue.

.....
The delivery plan and key actions do not mention anywhere important habitat types such as unimproved grasslands and ponds/wetlands, examples of two important habitat types which have been substantially lost in the last century. Restoration and creation of these are integral to nature-rich landscapes. Along with urban greenspaces, parks and gardens, these are both essential components of achieving the aims to halt and reverse biodiversity loss and should be clearly embedded in the Strategy and Delivery Plans.

There is also no separate mention of ‘creation’ of habitat, so it is unclear if ‘restoration’ means both restoring degraded habitats and creating lost habitats. In addition, how is ‘restoration’ to be defined for each ecosystem? How will this be monitored?

There is little mention of one of the key risks to biodiversity, which is a lack of appropriate management of habitats. The aim of bringing all habitats into appropriate management should be stated in the Delivery Plans.

A focus on restoration of ancient woodlands is supported and Edinburgh has areas of ancient woodlands which can be prioritised for protection and restoration. The consultation draft does not explain why a new register of ancient woodland is required, to replace the inventory of Ancient and Long Established Woodlands. Effective protection for remnants of ancient woodland, until such time as they can be restored, should be enacted through the Local Nature Conservation Site system of local designations. The new draft Planning Guidance supporting Policy 3 in NPF4 should, when updated, highlight the unique conservation value of ancient woodlands.

In addition, younger areas of native or near-native semi natural woodlands should also be identified and protected, and prioritised for enhancement and management to improve habitat condition where needed. This should include woodland which has naturally regenerated. Conditions should be created which allow for continued natural regeneration of native semi natural woodland, which is the best outcome for biodiversity, carbon and soil. Allowing space and the long time periods required for

natural regeneration and habitat succession is often overlooked in restoration and management, and this must change.

To be effective, legislation should go further in relation to INNS and require removal of widespread and established terrestrial INNS wherever they occur, irrespective of land use type – for example Giant Hogweed, Japanese Knotweed, Himalayan Balsam, Rhododendron Ponticum. A regulatory framework for biosecurity is needed, not just a voluntary code of conduct.

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Question 2b: Are the key actions, to support the objective: accelerate restoration and regeneration, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

- Yes
- No **NO**
- Unsure

Please explain the reasons for your response:

The following additional actions are suggested.

.....
...Policy and legislative improvements are also required to prevent further losses of biodiversity due to habitat destruction, degradation and fragmentation. Statutory or regulatory powers to prevent the destruction of nature rich areas outside of designated sites should be considered, and also extended to include locally designated sites such as Local Nature Conservation Sites.

.....
...The actions would be better set out as a framework of all priority habitats to be protected, created, connected and restored which can be applied at different scales including localised projects, rather than a programme of just six large scale national restoration projects and the national priorities of peatland and woodland. Reflecting and enabling action across all areas is critical to accelerated success and not adequately reflected in the proposals.

.....
Though NPF4 protects the environment and ensures mitigation, some form of standardised habitat banking such as Biodiversity Net Gain or an adapted Scottish variation must be mandatory, not only to prove evidence based net gains in biodiversity but to also encourage and create investment which is crucial to combat reductions in budgets and resources. This would be in line with the success stories of many English local authorities who are benefitting from a habitat banking model.

For private investors, a consistent and recognisable standard is important, and aligning with the approach in England would help achieve this.

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Question 2c: Which actions do you think will have most impact?

Please state the actions and explain the reasons for your response:

.....Ecosystem restoration particularly at a range of scales; action to reduce deer numbers; action to improve freshwater through RBMP and other activity.

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Question 2d: Have we captured the key actions needed to deliver the objective: protect nature on land and at sea across and beyond protected areas?

- Yes
- No **NO**
- Unsure

Please explain the reasons for your response:

.....

The key actions presented are broadly supported, but again there are important gaps and some changes are needed, particularly to timescales on a small number of actions relating to Nature Networks and green-blue spaces.

Although the title of this section includes ‘beyond protected areas’ there is little in the proposed key actions to show any action to protect nature beyond existing protected areas. An exception is the reference to urban green-blue spaces. As commented above, where are the measures to prevent further habitat loss in the wider countryside? This is needed alongside positive action within protected areas.

There is no recognition or reference to the network of designated Local Nature Conservation Sites. The LNCS designation system is supported by national guidance, which is currently being refreshed. They are recognised in the Planning system and incorporated into Local Development Plans. There is an excellent foundation to strengthen the status of these sites, both for greater protection from damage and introduce mechanisms to support and require positive management are put in place. There is a direct link between LNCS and local nature networks and this

is particularly important in urban areas. These are an excellent fit, both for identifying local priority sites and opportunities for core Nature Networks, and embedding Nature Networks into Local Development Plans.

The importance of LNCS may have been overlooked because a national perspective has been applied to the development of draft key actions. As LNCS systems are applied at a local authority scale, the opportunities they offer have perhaps been missed, as local area stakeholders have not had an opportunity to input to the development of the key actions in the draft delivery plans. This should be corrected as the delivery plans and key actions are finalised.

The proposal to promote the Scottish Geodiversity Charter in the Delivery Plans is related to LNCS designations, and is supported.

On Nature Networks, the 2030 target across these key actions is too late. The original target date in the programme for government was set for 2026. Many areas are already developing spatial Nature Networks to support Local Development Plans. Waiting 7 years to have these in place does not fit with an accelerated approach to reversing biodiversity loss.

Related to this is the proposal to develop toolkits to support creation of nature networks. This is an unnecessary step for creating the spatial Nature Network. All Local Authorities use GIS mapping, and creating an initial spatial Nature Network only requires access to designated site boundaries, already held by Local Authorities, and access to available habitat and species data and any other relevant urban greenspace data. A simple methodology can be adopted and rolled out relatively quickly to create an initial spatial Nature Network, which can be developed over time into opportunity areas for expansion and improvements. This both speeds up the timescale and simplifies the process, removing barriers to implementation.

The ambition to have a National Charter on urban green-blue spaces is welcome, however once again the timescale is too far in the future. Many local authority areas have carried out urban greenspace improvements for biodiversity for many years. Some are already actively looking at green-blue improvements required in the near future. A proposal to develop a Charter by 2030 feels again like this is too long a timescale for an “accelerated response”. Considering the related need to improve urban green-blue spaces for climate adaptation, this timescale for action does need to be brought forward. The more significant question, not address here, is identifying capacity and resources to deliver these outcomes.

The plans for Wee Forests is supported, but action is also needed to ensure that existing semi natural urban woodlands are being appropriately managed and enhanced for biodiversity. In the last twenty years initiatives to create Millennium Woodlands and Woodlands In and Around Towns have created large areas of new woodland and the management of these to maturity should not be overlooked in the push to plant more trees.

The action to require transport and active travel infrastructure to also deliver green-blue outcomes is welcome. The wording should go further and require that impacts on existing biodiversity is avoided, particularly the loss of trees or woodlands corridors, which commonly happens.

In relation to NPF4, requirement for proof of maintenance of green/blue infrastructure is supported for ensuring good habitat establishment, but any long-term maintenance, management and monitoring must be supported through funding and resources.

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Question 2e: Are the key actions, to support the objective: protect nature on land and at sea across and beyond protected areas, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

- Yes
- No **NO**
- Unsure

Please explain the reasons for your response:

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...Not fully, for the reasons set out above in question 2d.
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Question 2f: Which actions do you think will have most impact?

Please state the actions and explain the reasons for your response:

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.....The actions on 30x30, Nature Networks, NPF4 and urban green-blue space are likely to have the most wide-reaching impact.
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Question 2g: Have we captured the key actions needed to deliver the objective: embed nature positive farming, fishing and forestry?

- Yes **YES with one addition suggested**
- No
- Unsure

Please explain the reasons for your response:

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 ...A key action should be added for the local area Forestry and Woodland Strategies, which are required under the Planning (Scotland) Act 2019. These Strategies should require identification and protection of ancient woodlands for future restoration, ensuring that semi natural urban woodlands of any age are under positive management, and the importance of trees and woodlands in urban area for both biodiversity and climate adaptation through canopy cover and urban cooling/flood water alleviation.

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 Embedding nature positive agriculture should include promotion of exemplar projects such as the Lauriston Farm Agro-ecology site in Edinburgh.

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Question 2h: Are the key actions, to support the objective: embed nature positive farming, fishing and forestry, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

- Yes
- No
- Unsure

Please explain the reasons for your response:

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Question 2i: Which actions do you think will have most impact?

Please state the actions and explain the reasons for your response:

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Question 2j: Have we captured the key actions needed to deliver the objective: protect and support the recovery of vulnerable and important species and habitats?

- Yes
- No **NO – only partly**
- Unsure

Please explain the reasons for your response:

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...The key actions set out are presented from a national perspective, which does not reflect the large amount of work carried out through Local Biodiversity Partnership working. Local work on vulnerable and important species is cumulatively of great significance to national delivery, and should be reflected in the Delivery Plans. Only delivering the national work mentioned will not be sufficient to reverse biodiversity loss.

The Edinburgh Biodiversity Action Plan has delivered conservation outcomes for vulnerable and important species such as Swifts, Terns, rare plants and insects, as well as species monitoring activity and citizen science.

Updating the Scottish Biodiversity List is a very important piece of work and is welcomed. Developing the list to make it easier to identify priorities by geographical area would be helpful. A wider review gathering information on all partnership projects for vulnerable and important species, including local level, should be undertaken. This should include identification of where additional capacity is needed for necessary conservation work. This will demonstrate the extent of the effort required to protect and support species at risk across Scotland. It will also facilitate knowledge sharing and further collaborations. Some of the key actions proposed are better suited to local delivery, and are already being delivered locally, eg citizen science.

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Question 2k: Are the key actions, to support the objective: protect and support the recovery of vulnerable and important species and habitats, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

- Yes
- No **NO**
- Unsure

Please explain the reasons for your response:

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...More resources for work at local scales are required to ensure a higher number vulnerable species at risk are protected. To focus only on national priorities will be very insufficient. Local Biodiversity Partnership projects are currently only able carry out the required conservation activities on a small proportion of rare and notable species, without additional and sustained funding.
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Question 2l: Which actions do you think will have most impact?

Please state the actions and explain the reasons for your response:

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Question 2m: Have we captured the key actions needed to deliver the objective: invest in nature?

- Yes
- No **NO**
- Unsure

Please explain the reasons for your response:

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The scope of the Biodiversity Investment Plan must include local biodiversity delivery if Objective 5 is to be fully met. Suggest it is worth having an additional key action on ensuring that all public subsidies, grants and investment should also deliver nature-positive outcomes. For example, all infrastructure investment, transport, active travel, forestry funding cross referenced to other parts of the document.

The timing and duration of funding is absolutely critical to success. Too much funding is short term and available at short term. Nature conservation inherently needs to be planned over long timescales to be effective and successful. Piecemeal and short-term funding does not support this.

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Question 2n: Are the key actions, to support the objective: invest in nature, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

- Yes
- No
- Unsure

Please explain the reasons for your response:

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Question 2o: Which actions do you think will have most impact?

Please state the actions and explain the reasons for your response:

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Question 2p: Have we captured the key actions needed to deliver the objective: take action on the indirect drivers of biodiversity loss?

- Yes
- No
- Unsure

Please explain the reasons for your response:

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Question 2q: Are the key actions, to support the objective: take action on the indirect drivers of biodiversity loss, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

- Yes
- No

- Unsure

Please explain the reasons for your response:

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Question 2r: Which actions do you think will have most impact?

Please state the actions and explain the reasons for your response:

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Section Three – Nature Networks Policy Framework

Question 3a: Do you have any comments on the Nature Networks Framework?

Please provide any comments:

The Nature Networks Framework is welcomed. The concept builds on fundamental principles of increasing, improving and connecting habitat networks which are widely understood. Earlier iterations of habitat network mapping and availability of habitat and species data through existing local biodiversity partnership working means that re-framing priorities as 'Nature Networks' is a logical extension of previous work. Embedding spatial Nature Networks in Local Development Plans is a key additional benefit. The principle, particularly for urban areas, also supports health and wellbeing and climate adaptation outcomes.

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- Long term “permanent” support is needed for a nature network as it requires staff with a range of skills to work together, from community engagement, project management and ecology to ensure the longevity of an effective nature network which contains actions supported from the outset which can be monitored and evaluated through the years and continue to build a nature network.
 - Is a nature network now mandatory by 2030 or 2026? Previously, we had heard it was 2026.

- An update related to these points is needed within the NatureScot Nature Network guidance to encourage and ensure that any work contributing to the creation and development of a nature network prior to its mandatory status is in line with expectations.
The document states that nature networks need to be 'measurable increases in urban biodiversity', so there needs to be more standardised monitoring with what they're expecting in terms of which metrics are acceptable and encouraged.

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Section Four – 30 by 30 Policy Framework

Question 4a: Do you have any comments on the 30 by 30 Framework?

Please provide any comments:

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 The 30 by 30 Policy Framework is supported. As outlined earlier in this response, the inclusion of Local Nature Conservation Sites have been overlooked, possibly because local authorities and stakeholders who lead the process or designation were not sufficiently represented in developing the framework. There is an important opportunity to review and strengthen this established system for protection of locally important sites for biodiversity, which should not be missed. LNCS are far more numerous and extensive than other designations, so provide a significant increase in coverage and connectivity across areas.

Section Six – Statutory Targets for Nature Restoration

Question 6a: Do you agree with this approach to placing targets on a statutory footing?

- Yes **YES**
- No
- Unsure

Please explain the reasons for your response:

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...The principle outlined is broadly supported. However, the experts included in the Programme Advisory Group should be broadened out to also include experienced practitioners, including experts with experience of delivery and challenges of achieving good biodiversity outcomes at a local scale. This could help inform meaningful targets which translate into meaningful biodiversity gains. Outcome based targets should be set which focus resources into interventions which deliver real biodiversity gains.

For example, for urban greenspaces, percentage targets to convert amenity grassland into species rich meadows or other habitats from a baseline; targets for year on year increase in the percentage area of semi natural habitats under positive management or restoration. These examples are readily understood by local authorities or other large scale landowners. They address some fundamental challenges like habitat homogeneity and lack of management.

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Question 6b: Do you agree with the criteria set out for the selection of targets?

- Yes
- No
- Unsure **UNSURE**

Please explain the reasons for your response:

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.....The process set out seems reasonable, however how is the high level target influenced by action and decisions? Who is accountable if targets are missed? Species abundance is mentioned, and this can be affected by many factors. How would the high level targets be reported at a regional or local scale? The challenge with setting targets is to make them reflect the outcomes from choices and decisions implemented at a variety of scales.

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Question 6c: Do you agree statutory targets should include a combination of outcome targets and output targets?

- Yes **YES**
- No
- Unsure

Please explain the reasons for your response:

.....Yes, with the caveat of the comments made for question 6b.

Question 6d: Is the list of potential target topics sufficiently comprehensive in terms of the focus of proposed target areas and overall scope?

- Yes
- No **NO**
- Unsure

Please explain the reasons for your response. If you answered “No”, please provide details of any target topics which you think are missing from the list.

...It is comprehensive but there are a few suggested additions which, if included, would be a better fit with missing Global Biodiversity Framework indicators.

1. Measure loss of high biodiversity areas.
2. % of degraded ecosystems under active restoration – a meaningful version of what is proposed.
3. % of unsealed surface in urban areas (this is related to Nature Based Solutions/adaptation and is a proxy indicator). Alternatives are % of natural habitats in urban areas/% tree canopy cover in urban areas.

Question 6e: Do you have any other comments on the list of potential target topics?

- Yes **YES**
- No

If you answered “Yes”, please provide your comments below.

The potential target topics 1 to 9, on ecosystems, habitats and species, should definitely be included.

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Question 6f: Do you agree with the proposal to have the smallest feasible number of targets which reflects the complexity of nature restoration?

- **Yes YES**
- No
- Unsure

Please explain the reasons for your response:

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Question 6g: Do you agree statutory targets should align with the 2030 and 2045 timescales set out in the Strategy?

- **Yes YES**
- No
- Unsure

Please explain the reasons for your response:

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.....Yes, but with the caveat that for some habitat types, these are in fact very short timescales. Large scale and very long-term restoration projects in Scotland have timelines of 200 years, so there should also be vision set out for ecological restoration for even longer timescales, eg 2100.

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Question 6h: Do you agree the Bill should allow for the review of statutory targets?

- Yes **YES**
- No
- Unsure

Please explain the reasons for your response:

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Question 6i: Do you agree that reporting on targets should align with existing Biodiversity reporting requirements?

- Yes **YES**
- No
- Unsure

Please explain the reasons for your response:

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Question 6j: Do you agree that an Independent Review Body is needed to report on Government's progress in meeting the statutory targets?

- Yes **YES**
- No
- Unsure

Please explain the reasons for your response:

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