Delivering win-wins from economic development and nature recovery

Frequently asked questions

Natalie Duffus, E.J. Milner-Gulland, Sophus O.S.E. zu Ermgassen, Isobel Hawkins

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Aim

There has recently been a lot of policy churn and public discourse around how England can fulfil ambitious targets for economic growth as well as its targets for nature recovery. In this space there is a lot of generic or abstract guidance and a lot of specific responses to legislative moments. However, this can leave gaps in knowledge and understanding that mean it is hard to interpret arguments around the specifics of a particular piece of proposed legislation with reference to generic guidance.

This briefing aims to fill this gap by providing clear, objective and succinct answers to common questions about the issues underpinning public debate, and summarising evidence that could inform current decision-making with respect to the relationship between nature and economic development.

We aim this briefing at parliamentarians and their advisors, and we cover the issues from the perspective of applied conservation scientists who have research expertise in biodiversity net gain, biodiversity metrics, environmental economics, nature finance, and nature recovery.

Questions

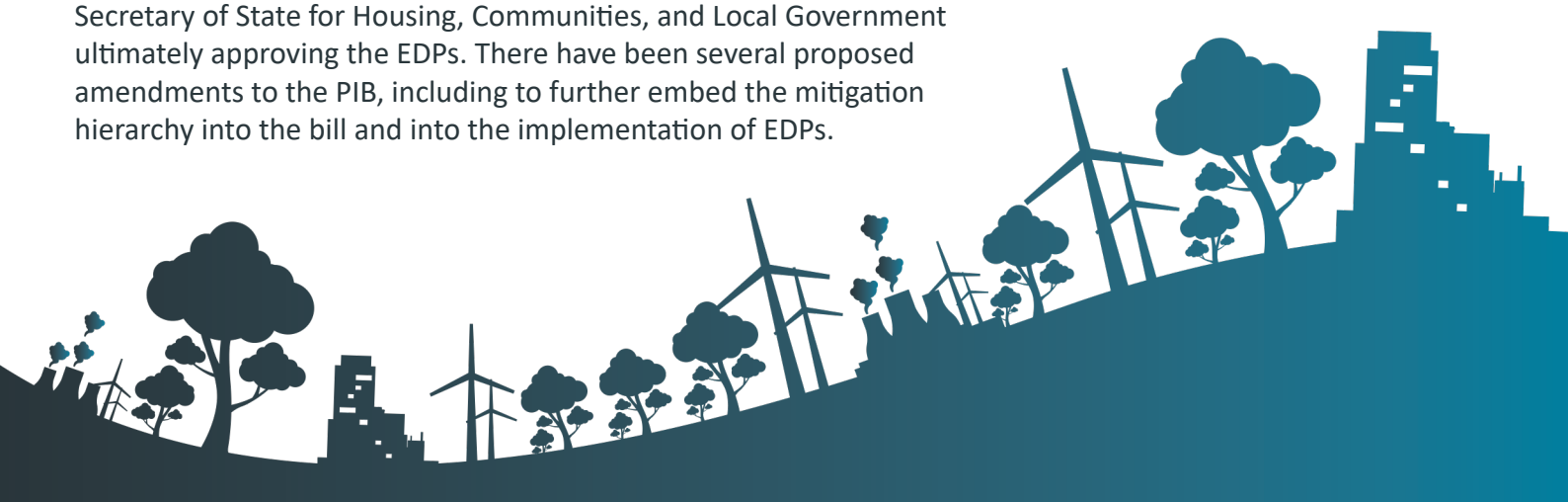
Our aim is to continue to extend and update the briefing as new questions come in.

1. What does Part 3 of the Planning and Infrastructure Bill propose to do?
2. What is nutrient neutrality and is it working?
3. What is the current system for compensating for development impacts on newts, and what can we learn from it?
4. What's a habitat bank and why is it useful?
5. What is Biodiversity Net Gain and what lessons can we learn from its implementation so far?
6. What is the mitigation hierarchy and why are people concerned about this in the PIB?
7. What does it mean when people talk about nature not being fungible?
8. What is the appropriate scale for coordinating nature recovery action?
9. How can a levy lead to nature recovery?
10. What evidence from other places or initiatives is there, to understand whether a levy would or would not work?

Responses

1. What does Part 3 of the Planning and Infrastructure Bill propose to do?

The proposed Planning and Infrastructure Bill (PIB) sets out to streamline the planning process, to support growth and the delivery of important housing targets[1]. Part III of the Bill aims to simplify the process of measuring and mitigating for impacts on the environment, through the creation of Environmental Delivery Plans (EDPs) and a Nature Restoration Fund (NRF). EDPs can be created for environmental features affected by development such as newts, nutrient pollution, or protected sites. EDPs will enable developers to pay into the NRF to fund strategic mitigation for harm to these features, rather than mitigating these harms themselves. Natural England will be responsible for bringing forward EDPs, with the Secretary of State for Housing, Communities, and Local Government ultimately approving the EDPs. There have been several proposed amendments to the PIB, including to further embed the mitigation hierarchy into the bill and into the implementation of EDPs.



For an explanation of how the PIB intersects with other legislation please see:

- CIEEM's response to the PIB: **https://cieem.net/resource/cieem-comment-on-the-planning-and-infrastructure-bill-2025/**
- Wildlife and Countryside Link responses to the PIB: **https://www.wcl.org.uk/planning-reform-risks-opportunities.asp** and proposed amendments: **https://www.wcl.org.uk/proposed-amendments-for-the-planning-and-infrastructure-bill.asp**
- PIB Key Concerns and Recommendations ECI briefing note: **https://www.naturebasedsolutionsinitiative.org/news/planning-and-infrastructure-bill-key-concerns-and-recommendations/**

2. What is nutrient neutrality and is it working?

Nutrient neutrality is an approach for mitigating the increased nutrient load associated with new developments[2]. Presently, wastewater treatment works are not able to remove all the nutrients from foul water drainage before it is discharged into the environment, where it can enter rivers, although there is a programme for upgrading them ongoing. These nutrient loads can have adverse effects on sensitive, protected sites. To address this issue, 27 sensitive water catchments across 74 LPAs have been identified. In these catchments, developments must produce a Habitat Regulations Assessment demonstrating that the development will have a *neutral* impact on current nutrient levels in the catchment. Developers use nutrient neutrality calculators to calculate the net changes in nutrient loading as a result of the development. The net change in nutrient loading plus a buffer is the nutrient budget developers must meet. This is achieved by on-site measures to reduce nutrient loading and by purchasing nutrient credits via the nutrient trading market or through Natural England's nutrient mitigation scheme. Nutrient credits are created by temporary agricultural management measures, the creation of semi-natural habitats, the creation of treatment wetlands, and the provision of new wastewater treatment facilities.

The Home Builders Federation (HBF) have stated that nutrient neutrality has led to delays in acquiring planning permission for more than 120,000 homes, for example due to issues with sourcing adequate nutrient credits[3]. These potential delays led to calls for nutrient neutrality to be scrapped. The government laid out plans in 2023 to weaken nutrient neutrality via the Levelling Up and Regeneration Bill, which were defeated in the House of Lords. Environmental groups highlighted that delays only affected small numbers of sensitive catchments and that the changes proposed would undermine legal protections for the most important protected sites.

The issues with nutrient neutrality highlight the importance of ensuring an adequate supply of mitigation schemes for developers to access.

3. What is the current system for compensating for development impacts on newts, and what can we learn from it?

Great Crested Newts (GCN) are a European protected species, under the Conservation of Habitats and Species Regulations 2017[4]. A mitigation license is needed for activities which disturb GCNs or damage their habitats, including for building development. Standard mitigation licenses are obtained from Natural England, and require mitigation of the impacts of any activity on GCN, and potentially compensation if the mitigation is not enough[5].

The alternatives to standard licensing are the District Licensing (DL) scheme, administered by the company Nature Space Partnership, and the District Level Licensing (DLL) scheme, administered by Natural England. The two schemes have no geographical overlap, each covering different planning authorities in England. Under these licensing schemes, local planning authorities hold the GCN licenses.[6] Developers entering into the scheme pay into a compensation conservation fund, where fees are earmarked for compensatory habitat creation.

In Nature Space's District Licensing scheme, compensatory habitat creation is delivered by a single designated third-party provider, the Newt Conservation Partnership. This organisation provides compensation for damage to both ponds and terrestrial habitat. Ponds are created at a ratio of 4:1 for every pond lost, and a ratio of 2:1 for ponds which are degraded. Terrestrial habitats are compensated for at a 1:1 ratio[7]. In contrast, Natural England uses multiple third-party providers to implement compensation. Under this scheme, ponds are compensated for, but not any surrounding terrestrial habitat. Providers include the Wildlife Trusts, local councils, and ecological consultancies[8]. Both District Licensing and District Level Licensing are regulated by Natural England.

The current licensing system for GCN conservation highlights several key lessons for ecologically effective compensation conservation funds or levies. Nature Space's District Licensing scheme successfully avoids time lags between nature being impacted and the associated compensatory activity, as the Newt Conservation Partnership creates ponds ahead of time, which are subsequently allocated as compensation for developments paying into the fund. The level of fee required, and the subsequent compensation, is scaled in proportion to the impact of the development. The scheme uses high compensation ratios, aiming for a net positive impact. District Licensing also presents a good example of independent oversight and monitoring: fees are collected by the company Nature Space Partnership, and revenues are used by the partner NGO, Newt Conservation Partnership, with the overall scheme regulated by Natural England. Underpinned by a spatial strategy to connect and expand existing GCN populations, the scheme reports successful ecological outcomes. Landscape level ecological monitoring reports show compensation ponds consistently demonstrate higher GCN occupancy rates than existing ponds[9].

4. What's a habitat bank and why is it useful?

Habitat banking refers to the creation of compensatory habitat in advance of the loss of habitat e.g., due to development. Creation of habitat in advance of its loss is advantageous because it reduces the time lag between the loss of habitat and the creation of new habitat. It also reduces some of the uncertainty in the outcomes of habitat creation.

Habitat banking is encouraged under BNG by affording more biodiversity units to projects which create habitat in advance of the habitat loss, and less units to projects which have a delay between the loss and creation. A number of different providers have already started to develop habitat banks to feed the BNG market, including NGOs such as the Wildlife Trusts, and commercial organisations like the Environment Bank.

5. What is Biodiversity Net Gain and what lessons can we learn from its implementation so far?

Brought in via the Environment Act (2021), Biodiversity Net Gain (BNG) is an approach to mitigating the biodiversity impacts of construction in England, requiring developers to deliver a 10% uplift in biodiversity compared to the levels that were present before they started work[10]. BNG currently applies to most minor and major developments and is expected to apply to Nationally Significant Infrastructure Projects (NSIPs) from May 2026. BNG is a habitat-based approach, measured using the Statutory Biodiversity Metric – a proxy for biodiversity based on the condition and extent of habitats, rather than individual species.

To achieve the 10% uplift in biodiversity, developers should follow the Biodiversity Gain Hierarchy, avoiding and minimising impacts on the most valuable habitats, before offsetting unavoidable loss by enhancing and creating habitats. Ideally, habitats should be enhanced or created on-site (within the development footprint), before developers turn to purchasing biodiversity units from the off-site BNG market. The off-site BNG market has a booming supply of units for developers to purchase, with more than 4000ha of offsets registered for sale[11]. However, demand for offsite offsets has been more limited, and has come predominately from small developers, because developers with large areas of land are able to fulfil their obligations within the footprint of the development itself.

BNG is an effective tool for mitigating and compensating for damages caused to habitats in the development process. Given the habitat focus of BNG, other environmental protections (e.g., for species), remain essential. It is also essential that any commitments to biodiversity enhancement within developments are followed through on by the developers, and that this is monitored. This has been a challenge to date due to lack of capacity within local planning authorities.

6. What is the mitigation hierarchy and why are people concerned about this in the PIB?

The Mitigation Hierarchy is very well established in national and international policy and practice, since the 1970s. It is for example written into the requirements for World Bank funding for infrastructure projects[12]. The key value of the mitigation hierarchy is to ensure that people do not jump directly to compensation (e.g. biodiversity offsetting) before they have considered whether the damage to biodiversity can be avoided.

The Mitigation Hierarchy is a framework of prioritised, sequential stages, which guides users to address impacts on the environment. The framework consists of four iterative steps to address negative impacts to biodiversity, firstly, by attempting to avoid harm, then to minimise it, followed by restoring impacted areas. Finally, the last resort is to offset unavoidable losses which cannot otherwise be addressed.

This hierarchical sequence is applied to prioritise the most effective actions, in a precautionary way, so that prevention of impact is preferred over compensation after the fact (which may or may not fully mitigate the impacts). Consideration of impact mitigation needs to be built into any development at the earliest possible time (at the conception and design phase), so as to maximise the potential for avoidance and reduction of impacts.

The stages are:

1. **Avoidance:** The most effective way to address negative impacts. Projects aim to prevent harm to biodiversity in the first place, e.g. through appropriate siting of developments away from biodiversity-rich habitats.
2. **Minimisation:** If impacts cannot be avoided, projects are designed to minimise the severity of the impact on biodiversity. This can include measure to reduce the duration, extent or intensity of the negative impacts.
3. **Restoration/rehabilitation**: If impacts cannot be completely avoided or minimised, this stage seeks to restore degraded ecosystems to their state prior to impact (restoration), or to restore basic ecological functions (rehabilitation).
4. **Offsetting:** The final stage, to be used only as a last resort. If impacts cannot be fully avoided, minimised or restored, the residual losses are compensated for by actions such as creating or enhancing habitats.

In the case of the Planning and Infrastructure Bill the issue of concern has been that there is no assurance that the mitigation hierarchy will be followed, and in particular there is no assurance that impacts on rare, fragile, protected or irreplaceable habitats and species should be avoided except in exceptional circumstances.

7. What does it mean when people talk about nature not being fungible?

People often compare biodiversity to carbon and say that it is impossible to have a market for biodiversity (or compensate for biodiversity loss in one place with gains in another) because, unlike carbon, nature is local and complex and unmeasurable. So, we don't have a universal metric for nature like tCO2e for carbon.

In one sense this is true - biodiversity is really complicated, and there is no single metric that could be used to balance biodiversity improvements in one place with biodiversity losses in another. In another sense, though, it's more complicated than that. For example, you could do things to improve habitat for newts in one place so that their population grows overall, even while putting housing on another area of their habitat. Whereas you can't increase the total number of healthy functioning chalk streams or areas of ancient woodland in England, and the loss of any part of these ecosystems is a loss for ever (in practical terms).

In the Planning and Infrastructure Bill, the aim of EDPs is to choose particular species or habitat types of concern, and ensure, through the payment of a nature levy for conservation elsewhere, that overall the status of that species or habitat in England is better than it would have been in the absence of the developments in the EDP's area of action. For some species and habitats, this could work, but for others it cannot work (and there is a continuum of possibility). This has led to concern because there is currently no guidance about which aspects of biodiversity will and will not be suitable for EDPs.

8. What is the appropriate scale for coordinating nature recovery action?

Action for nature recovery can be coordinated on several scales, all with their own advantages. Coordination on the local level enables compensation to be kept as close to the impact as possible, which has ecological benefits. Importantly, local action also enables the communities affected by the loss of nature to access to the compensation[13]. Coordination on the regional (e.g., county) level, allows for more strategic action while still delivering on local objectives. This approach is exemplified by Local Nature Recovery Strategies (LNRS), where resources can be directed toward the most important areas of the region. Coordinating on a national level could, in theory, maximise biodiversity benefits by enabling funding to be pooled toward the most important habitats for nature (which may only be found in a few particular places)[14]. However, this requires careful balancing with considerations such as ensuring access to nature for people.

9. How can a levy lead to nature recovery?

A key rationale for the nature levy in the PIB is to optimise the spending of scarce resources for nature recovery, by combining the levy payments from developers with public funding to Natural England for nature recovery. In principle this should enable more "bang for buck" for nature.

The first thing to always remember is that compensatory payments for damage to nature from infrastructure development are by definition not contributing to nature recovery - that's what "compensatory" implies; the payments are to bring nature back up to the level that it was at before the damage was incurred. So, combining funding from compensatory payments with funding for nature recovery doesn't make for more nature recovery, unless there is additional benefit from strategic deployment of a larger and more flexible fund.

Payments are also not the same as outcomes - it's the biodiversity outcomes that matter, not the money. It's very difficult (from experience elsewhere) to know how much payment is needed in order to get to "no net loss" of biodiversity, because that depends upon many factors, lots of which are out of the control of the body trying to restore nature (e.g. the weather, disease, drought, flood). So the general approach is to use "multipliers" (such as the GCN ratio of 4 ponds needing to be made for every one pond that is destroyed). This should mean that more than enough nature is delivered, with the worst case being "enough nature".

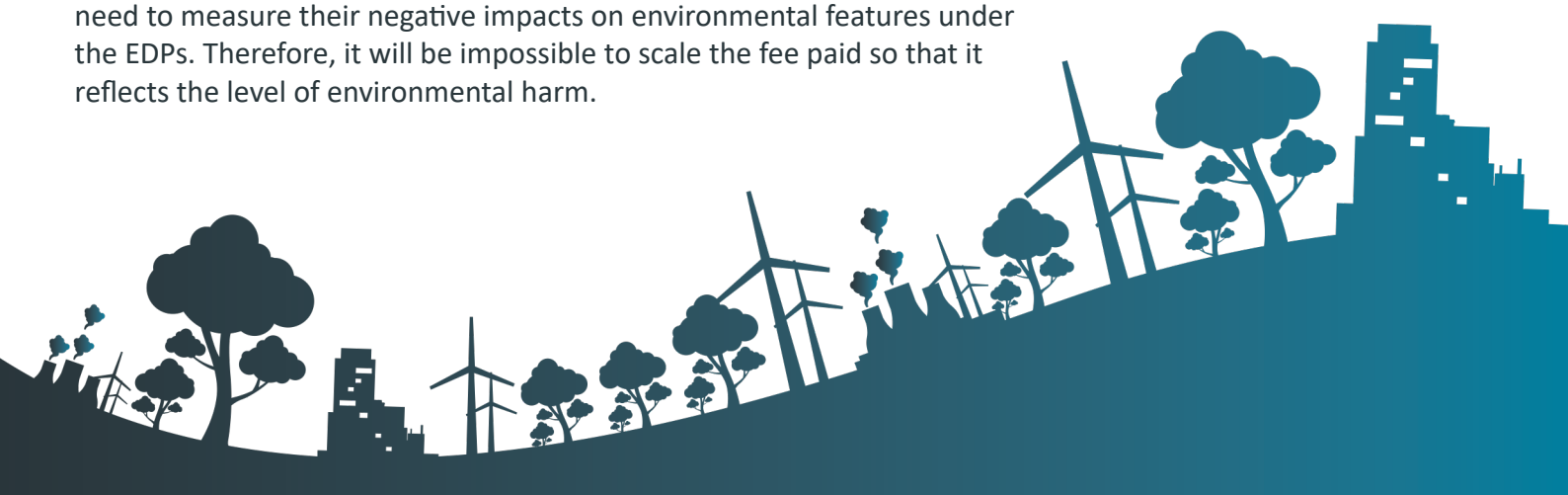
Using multipliers would mean that the levy should "buy" enough nature restoration, with a margin that depends upon the uncertainty of the outcome. This is the same approach as engineers would use when designing a bridge, to ensure that under normal (and plausible extreme) operating conditions, it will not collapse. See "habitat banks" FAQ for another approach that reduces risk by restoring nature first, before the damage is done, and which therefore can be more cost-effective.

10. What evidence from other places or initiatives is there, to understand whether a levy would or would not work?

Compensation levies have been applied in many other contexts, with existing examples providing evidence of key opportunities and challenges of using a levy to deliver compensation. We mentioned the Great Crested Newt levy as one example above; this is a good example of how a levy can be deployed to produce better results than would have happened with compensation being done at the individual project level.

China's Forest Vegetation Restoration Fee: China has three compensation conservation levies, focused on compensation for forests, grasslands or wetlands. The most developed of these is the Forest Vegetation Restoration Fee (FVRF), charged to developers causing unavoidable loss of forest[15]. Compensatory fees are pooled and used to deliver forest restoration. The FVRF has previously faced several challenges in delivering effective ecological outcomes. The level of fee was in many cases set based on the area of forest lost: a metric which provides only a very limited proxy for the ecological impact of development. In many provinces, the level of fee was insufficient to deliver the required compensation. However, several local governments are now moving to raise the FVR fees. For example, Shanghai, which previously had the lowest fees, had the highest level of FVRF in 2024[16].

This highlights that a key consideration for designing ecologically effective compensation conservation levies is to provide sufficient funds to deliver compensation commensurate for losses. This consideration is of relevance to the proposed Nature Restoration Fund: as currently proposed, developers will not necessarily need to measure their negative impacts on environmental features under the EDPs. Therefore, it will be impossible to scale the fee paid so that it reflects the level of environmental harm.



Decoupling the amount of fee paid from the impact, or not using robust ecological metrics to measure gains and losses, can result in poor ecological outcomes. To ensure an effective conversion between ecological and monetary value, robust ecological metrics are required in a site-specific impact assessment, with impacts translated into a proportionate level of payment, sufficient to deliver the required compensation.

New South Wales' Biodiversity Conservation Fund: In Australia, New South Wales uses a compensation conservation levy for unavoidable impacts to native vegetation habitats due to land development. The fund administrator, the Biodiversity Conservation Trust (BCT), takes on developers' compensation liabilities on receipt of payment into the Biodiversity Conservation Fund, and buys biodiversity credits from third parties to deliver the compensation.

BCT has experienced challenges in administering the fund. Previously, most developers with compensation liabilities paid into the fund, due to the comparative ease of doing so relative to sourcing their own compensation[17-18]. As such, the compensation liabilities the BCT took on increased rapidly, which in combination with a limited supply of biodiversity credits, risked non-delivery of compensation, and a loss of nature during the time in which new habitat was being created[19-20]. Consequently, reforms were implemented in 2024, including payment into the Fund only being permitted as a last resort. Reforms also created the Biodiversity Credits Supply fund, which purchases credits in advance of them being required by developers[21].

The challenges experienced by the BCT reveal that a key consideration for designing effective funds is avoiding a situation in which current losses in nature are traded for uncertain future gains in nature. This can be done by using time discounting, multipliers, and most effectively, by securing compensation in advance of impact. These strategies could be transferred to the proposed Nature Restoration Fund.

England's Statutory BNG Credits: In England's Biodiversity Net Gain policy, the last option for developers who are unable to source their own offsets, is the purchase of Statutory Credits from Natural England. Acting as a compensatory conservation levy, these payments should be pooled to deliver habitat creation and/or enhancement, much as is envisaged for the Nature Restoration Fund.

However, a key challenge facing this compensation conservation fund is insufficient revenue generation. In the first year of operation, the fund received £206k in compensatory payments from developers, but reported an expected £300k expenditure on fund administration[22], compromising the Fund's ability to actually deliver compensatory habitat enhancement. This highlights the need to account for administrative costs and set fees sufficiently high to deliver the required compensation, or risk acting as a license to pollute.

This consideration is of relevance to the proposed Nature Restoration Fund, as the economic viability of development must be accounted for when setting the levy under an EDP. Otherwise there's a risk of potentially underfunding the amount of compensation which is required. Statutory Credits, do, however, incentivise adherence to the Mitigation Hierarchy, where compensation is permitted only as a last resort. This highlights another key consideration for the proposed Nature Restoration Fund: as things stand, no meaningful incentive for avoidance is created, as developers may not need to measure their environmental impacts before paying into the Fund.

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Authors

Natalie Duffus[1]
E.J. Milner-Gulland[1]
Sophus O.S.E. zu Ermgassen[1]
Isobel Hawkins[1]

[1]Department of Biology, University of Oxford

For more information, please contact E.J. Milner-Gulland: ej.milner-gulland@biology.ox.ac.uk

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agile@oxfordmartin.ox.ac.uk

www.agile-initiative.ox.ac.uk
www.linkedin.com/company/agile-initiative

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