

The Rt Hon Angela Rayner MP
Secretary of State for Housing, Communities and Local Government
Ministry of Housing, Communities and Local Government
Fry Building
2 Marsham Street
London
SW1P 4DF

29 July 2026

Dear Rt Hon Angela Rayner MP,

CC: Rt Hon Matthew Pennycook (Minister of State for Housing and Planning); Lise-Anne Boissiere and Cathy Francis (Directors for New Towns, Infrastructure and Housing Delivery); Jonathan Blathwayt (Senior Advisor at the Ministry for Housing, Communities and Local Government); Pippa Heylings MP; Ian Sollom MP; Daniel Zeichner MP; Cllr Katie Thornburrow (Leader, Cambridge City Council)

Re: Voice of the River on the Board of the Greater Cambridge Development Corporation

We are a group of residents of the Greater Cambridge area and representatives of organisations of the same area. We are writing to you to ask that the Greater Cambridge Development Corporation (**GCDC**) provide for a permanent, voting seat for the Voice of the River within their framework agreement and governance arrangements for each of the GCDC's board (the **Board**) and planning committee. Please see the [details of this proposal](#) and the evidence supporting it in the attached [Annex](#).

A voice of Nature¹ is a recognised professional model, similar to a guardian ad litem, appointed to represent the interests of a party who cannot represent themselves. This role has been held by ecologists and lawyers in other settings.² It is not a campaigning role, but one designed to support a board to reach the best decisions possible for all stakeholders, including the river, in each specific context. The Voice of the River's rights are to flag, require reasons and report - it is not designed to unilaterally block or veto decisions.

Why the Voice of the River is necessary to support delivery of the GCDC's objectives

1. Transformational and sustained economic growth depends heavily on the services provided by Nature, most important here are water systems and plant and animal ecosystems (see the [Business Case for Nature](#) below). These are not peripheral concerns but preconditions for the any growth objective. We are entering a phase of urgency in relation to heat and water stress that cannot be ignored (see [National and Local Crisis](#) below).

¹ 'Nature' is capitalised throughout this document to reflect its treatment as a subject with its own interests and standing, rather than as a resource - consistent with the convention adopted in the UN General Assembly's [Harmony with Nature](#) reports (United Nations, "Harmony with Nature," Report of the Secretary-General, A/71/266 (1 August 2016), Footnote 3) and in the sources cited in this proposal, including the [NICW](#) and Lawyers for Nature reports.

² National Infrastructure Commission for Wales (NICW), [Project: Nature on the Board](#) (January 2026)

2. While MHCLG's governance proposals anticipate an environmental specialist on the Board, such a role (or similarly a water specialist) would be insufficient to achieve the GCDC's growth and environmental objectives and existing statutory duties in regard to Nature and climate. A voice of Nature would be structurally superior, for the following reasons (see more detail here [Voice of Nature vs Environmental Specialist](#)):
 - a. Holistic trade off management: As a rights-based representative, the Voice of the River can change how cumulative trade-offs are framed, negotiated and resolved, allowing economic activity to be managed within ecological limits (see [Rights-based limits vs. discretionary harm-balancing](#)).
 - b. Standing, not just presence: an outvoted specialist has no consequence; a Voice of the River (with rights to flag matters, require published reasons, and report independently) has protected recourse (see [Structural standing vs. outvotable seat](#)).
 - c. Range over discipline: an "environment" board seat typically draws on one discipline. Nature-informed design (e.g. biomimicry-based planning) needs a mechanism that can convene several views (see [Breadth of expertise vs. a single discipline](#)).
 - d. Standpoint and timescale: representing and accountable to the ecosystem's interests and timescales, not just human interest (see [Ecological standpoint vs. compliance](#)).
 - e. Holistic integration vs fragmentation: The GCDC exists to overcome fragmented institutional resources, yet an "environment" Board member risks replicating fragmentation for the water infrastructure. Their perspective will be confined to the GCDC's political boundary, not the water system the area depends on (see [Holistic integration vs fragmentation](#)).
3. Cambridge City Council's unanimous motion of [16 July](#) recognising the rights of the River Cam resolved to raise concerns with the GCDC and echoed GCDC consultation feedback on the risk of environmental protection being subordinated to development. It would be inconsistent with the GCDC's priorities not to make a comparable commitment. However, as councillors noted, rights without delivery risk being empty. The Voice of the River mechanism goes further than a charter.
4. Throughout the UK (and globally), a rapidly increasing number of public bodies have recognised rivers' rights and in some cases created a board seat for Nature (see [Rights of Nature Precedents](#) below). This evidences a clear and growing expectation that leading public bodies will do the same.

The government may consider that it has already addressed public environmental concerns through the GCDC's amended objectives and intention to recruit a board member with environmental expertise. As set out above and in the Annex, a statement of intent creates no enforceable standing and an ordinary board seat cannot hold the breadth of expertise or independence required. A Voice of the River mechanism provides the practical safeguard to allow the GCDC to evidence that it is meeting its duties.

Next Steps

Since the GCDC was established recently and the Framework Agreement is expected to be finalised within the coming weeks, we would request that you respond to this letter **no later than 12 August 2026** to:

- confirm who is leading the Framework Agreement's drafting and its expected timeline;

- indicate whether you will consider incorporating this proposal into the Framework Agreement and other governing documents; and
- indicate whether our group (and their associated governance and ecology experts) may contribute further - including proposing candidates for the interim board, the Board, or a Voice of the River role and input into designing the governance mechanism itself.

We recognise this is a tight timeframe, but given how quickly the GCDC's governing documents are being finalised, a prompt substantive response would allow this proposal to be considered while those documents are still open. We would welcome the opportunity to discuss this further, and are happy to provide any additional detail or evidence.

Please contact cam-on-board@googlegroups.com with any responses to this letter.

We, the undersigned, ask that a Voice of the River is included in the GCDC governance structure.

Yours sincerely,

Jenni Ramos (Impington, Cambs), Director - ReAnglia CIC/author - IBA Nature-Intelligent Legal Services

Dr Lara Hawkins (Haslingfield) Friends of the Rhee, Trustee Great Ouse Rivers Trust

Clara Todd (Cambridge) CEO of Water Sensitive Cambridge, Cam Catchment Partnership steering group

Dr Helen Cook (Cambridge) Director Resilience Web CIC

Dr Steven Swain (Shepreth) Chair of Friends of the River Shep

Elisabeth Spain (Shepreth) Chair of Sustainable Shepreth Steering Team

Dr Frances Early (Great Shelford)

James Murray-White (Cambridge) Filmmaker, curator, campaigner

Hilary Cox Condon (Cambridge) Participatory artist for social & environmental justice

Emma Linford (Cambridge) Environmental and Social researcher and campaigner

Professor Aled Jones (Cambridge), Director, Global Sustainability Institute, Anglia Ruskin University

Nicole Barton (Histon and Impington) Chair of Histon & Impington Sustainability Group

Anastasia Badder (Cambridge) Research Associate University of Cambridge, Anthropologist of religious ecologies

Helen Boothman, Trustee Great Ouse Rivers Trust, Trustee Great Ouse Valley Trust

Geraint Cooper FCCA, Newport River Group

Phil Rothwell, Trustee Great Ouse Rivers Trust, Chair Northumbria Regional Flood and Coastal Committee

Rupert Pearce Gould (Harston), Cam Ely Ouse Catchment Partnership, Harston Parish Councillor

Patrick Morris (Cambridge) Co-Artistic Director of Menagerie Theatre Company

Ruth Sapsed (Cambridge). Creative Producer and Campaigner.

SJ Beard (Histon). Research Affiliate, Centre for the Study of Existential Risk, University of Cambridge.

Ros Alexander (West Suffolk). Chair of Trustees, River Lark Catchment Partnership, Host of CamEO, Host of Lark and Little Ouse Headwaters Farm Cluster

Emily Dowdeswell (Cambridge), Director, Cambridge Curiosity and Imagination

Annex - DRAFT Proposal for a Voice of the River on the Board of the GCDC and Supporting Materials

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DRAFT Proposal for the Voice of the River

1. A representative of the River (representing the catchments³ of all rivers affected by the GCDC's decisions and activities⁴, and all life within those catchments. The Voice of the River has a permanent, voting seat on the Board and planning committee, with budget and independence to consult external experts, a right to publish an annual comment in the GCDC's public reports, and the right to unilaterally designate any matter as a 'Nature Related Matter,' triggering enhanced preparation time and mandatory expert consultation before the Board completes that decision process.

If a full voting Board seat is not feasible, the following alternatives to be considered, together or independently:

2. The Voice of the River to be appointed as an advisor to the Board with:
 - a. budget and independence to consult external experts;
 - b. a right for the Voice of the River to publish an annual comment in the GCDC's public reports;
 - c. timely access to Board papers and a right to submit written material ahead of all Board discussions;
 - d. the right to unilaterally designate any matter as a 'Nature Related Matter' triggering both a duty of candour as to the detail of the matter, and a duty for the Board to consider the Voice of the River's recommendations, report on how they were considered and, give reasons if they were not followed.
3. The Voice of the River to be appointed with a permanent, non delegatable seat on the planning committee of the GCDC (with the relevant statutory consent required by the Secretary of State) with budget and independence to consult external experts.

While the Secretary of State retains statutory responsibility for Board appointments and consent over external planning committee membership under the Local Government, Planning and Land Act 1980, we recommend the Voice of the River role be filled through open recruitment informed by relevant expert and community input (an approach taken for the Voice of the River Wye - see [Rights of Nature Precedents](#) below) rather than by private nomination.

³ For the purposes of this proposal, catchment means the entire hydrological system associated with a river, including surface water, soil moisture, groundwater, aquifers and atmospheric water associated with that system.

⁴ The River Cam, its tributaries and parts of the upper Great Ouse watershed are the main rivers included within the GCDC's area.

Business Case for Nature

- There is international consensus that biodiversity loss represents a critical financial risk to the entire economic system.⁵ The World Economic Forum's 2025 and 2026 Global Risks Reports found biodiversity loss and ecosystem collapse to be the second greatest global risk over the next ten years.⁶
- The [Taskforce on Nature-related Financial Disclosures](#) (TNFD) is a market-led and science-based initiative supported by national governments, businesses and financial institutions worldwide. By [November 2025](#), over 733 organisations and US\$20tn in assets under management had publicly committed to starting Nature-related reporting. 81 per cent of investors said that they were engaging with corporates to understand Nature-related risks, impacts, and dependencies.⁷
- The United Kingdom financial sector shows ten per cent direct exposure and 56 per cent upstream exposure to high or very high Nature dependencies, alongside 72 per cent of FTSE 100 sectors.⁸
- Case studies show that Nature-related financial risks have already materialised in billions of dollars in direct financial losses across sectors.⁹
- A 2024 legal opinion authored by high ranking corporate and financial law barristers concluded that company directors in the UK have legal duties to consider and manage Nature-related risks, which are capable of affecting the company's short- and long-term financial success.¹⁰ This clarifies the legal basis for the financial relevance of Nature in decision-making.
- Following board briefing materials produced by the Commonwealth Climate and Law Initiative and TNFD, in 2026 the government published materials on putting Nature at the heart of boardroom decisions, developed in partnership with the Council for Sustainable Business, the Green Finance Institute, the Aldersgate Group and the Institute for Sustainability and Environmental Professionals.¹¹

National and Local Crisis

- In July 2025, the Secretary of State for Energy Security and Net Zero and the Secretary of State for Environment, Food and Rural Affairs gave the first-ever joint "State of Climate and Nature" statement to Parliament,¹² intended to become an annual assessment of the UK's climate and Nature crises and the government's response. There was a further similar statement and debate in July 2026.¹³
- A Nature security assessment on global biodiversity loss, ecosystem collapse and national security was partially published in January 2026. It concluded that global ecosystem degradation and collapse

⁵ See TNFD, [Executive summary of the recommendations of the TNFD](#) (2023); Network for Greening the Financial System, [Central banking and supervision in the biosphere](#) (2022); World Bank Group, [The Economic Case for Nature](#) (2021); UN Principles for Responsible Investment, [Engagement on nature and biodiversity: The imperative for investors](#) (6 November 2024); World Economic Forum, [Nature Risk Rising: Why the Crisis Engulfing Nature Matters for Business and the Economy](#) (January 2020); Organisation for Economic Co operation and Development, [Biodiversity: Finance and the Economic and Business Case for Action](#) (2019).

⁶ World Economic Forum, [Global Risks Report](#) (2025); World Economic Forum, [Global Risks Report](#) (2026).

⁷ Responsible Investor, [RI Nature and Investors Survey 2025: Results](#) (September 2025).

⁸ Green Finance Institute, [Assessing the Materiality of Nature-Related Financial Risks for the UK](#) (April 2024).

⁹ BloombergNEF, [When the Bee Stings: Counting the Cost of Nature-Related Risks \(2023\)](#).

¹⁰ Shivji KC, Stubbs KC, J Burton, K Anderson and H Sharafi, [Nature-related risks and directors' duties under the law of England and Wales](#) (March 2024)

¹¹ The Commonwealth Climate and Law Initiative (CCLI) & Climate Governance Initiative (CGI), [Nature And The Board: What Directors Must Understand And Act On](#); TNFD, [Asking Better Questions on Nature for board directors](#); DEFRA, [Business leaders put nature on boardroom agenda - GOV.UK](#)

¹² UK Parliament, Hansard, [State of Climate and Nature](#) (14 July 2025)

¹³ UK Parliament, Hansard, [State of Climate and Nature](#) (13 July 2026)

already threaten UK national security and prosperity - citing crop failures, intensified natural disasters, and infectious disease outbreaks as impacts already being felt, and warning these threats are "highly likely" to intensify through to 2050 and beyond without major intervention. It identified six ecosystems of strategic importance to the UK and found that their decline could trigger cascading risks including geopolitical instability, economic insecurity, conflict, migration, and increased inter-state competition for resources — disrupting food, water, health, and supply chains in the process.¹⁴

- Public pressure for government transparency on this issue is building. An independently-produced [documentary of the November 2025 National Emergency Briefing](#) (delivered to an invited audience of over 1,200 politicians and business, faith, and civic leaders) is now being screened in communities across the UK, with organisers building support for a televised government briefing.
- The Office for Environmental Protection (OEP) annual progress reports have repeatedly found the government off track to meet its biodiversity commitments.¹⁵
- The 2023 State of Nature report (the most comprehensive assessment of UK wildlife, compiled by over 60 conservation organisations) found that species abundance has declined by 19% on average since 1970, with nearly one in six of the 10,000+ species assessed at risk of being lost from Great Britain entirely. The UK is now classified as one of the world's most Nature-depleted countries.¹⁶
- The local region has suffered unprecedented water stress in summer 2026, with the region's [first hosepipe ban in 30 years](#) and the Environment Agency's ["Prolonged Dry Weather" declaration](#) for the Cam and Ely Ouse catchment for the period 18 to 26 June 2026.

Voice of Nature vs Environmental Specialist

a) Rights-based limits vs. discretionary harm-balancing

A Voice of the River would support the Board in moving away from seeing the river as a resource to be managed. Currently, environmental protection is one interest among many, the voice of the river would ensure that any justification on economic activity and infrastructure is within ecological limits rather than at their expense. *"The question becomes 'How can this activity occur while upholding the river's rights?' rather than 'How much harm is acceptable?'"*¹⁷ It reduces cumulative degradation caused by individually 'acceptable' decisions and provides a clear decision-making baseline. It makes implicit and, sometimes dispersed trade-offs, *explicit*, surfacing who benefits and who bears costs, making long-term ecological harm visible and reducing policy incoherence across sectors so that while trade-offs do not disappear, they become accountable. Trade-offs become about how development is supported, not whether rivers are protected. The idea of a Voice of the River is not to prohibit development but to demonstrate alignment with river health, incentivise lower-impact design and shift investment toward

¹⁴ Department for Environment, Food & Rural Affairs, [Nature security assessment on global biodiversity loss, ecosystem collapse and national security](#) (January 2026)

¹⁵ Office for Environmental Protection, [Government remains largely off track to meet its environmental ambitions](#) (January 2024), [This Government has the chance to get on track to meet legal environmental commitments](#) (January 2025), [Progress in improving the natural environment in England 2024/2025](#) (January 2025).

¹⁶ State of Nature Partnership, [State of Nature](#) 2023

¹⁷ This paragraph is informed by and quotes from a drafted but unpublished paper by Levene, J (2026 - forthcoming) via the River Rights Network, "How rights-based approaches can help ease trade-offs in catchment governance."

Nature-positive infrastructure - providing developers with a clear, known standard to design against from the outset, reducing uncertainty and the risk of costly legal or reputational disputes arising from unpredictable, discretionary decisions (especially given fast-shifting public perception of the cost of ecological harm and water risks). A Voice of the River is intended to move away from zero-sum thinking ("environment vs economy") to regenerative thinking ("what strengthens both?"). This encourages Nature-based solutions, circular water use and long-term resilience over short-term extraction. It should enable more flexible, outcome-focused approaches, justification for public funding of ecosystem services, and recognition of developers as stewardship partners.

b) Structural standing vs. outvotable seat

Bodies with a primary growth mandate are, as a matter of organisational structure rather than intent, systematically prone to under-weighting constraints that do not appear in headline delivery targets. One sole undifferentiated board member with environmental expertise but without any specific duty or mandate to represent Nature or any structurally protected standing can easily be outvoted without consequence. A Voice of Nature mechanism, with rights to flag Nature and water-related matters, require published reasons where its recommendations are not followed, and report independently to the public, can ensure that water and ecosystem limits are treated as load-bearing conditions on the GCDC's growth objective, not one factor to be weighed among many, and support better evidence-based decision making. Far from slowing delivery, this kind of embedded, standing voice can accelerate decision-making by surfacing environmental risk before decisions are taken, rather than after - avoiding the delay, legal challenge, and reversal that under-considered decisions invite later. As one company that adopted this model said: *"though you might argue some of the decisions might have happened anyway, there is no doubt that [it] has caused them to happen quicker"*¹⁸ (see [Faith in Nature](#) below).

c) Breadth of expertise vs. a single discipline

An "environment" board member is typically recruited from a single discipline oriented toward mitigating the impact of conventional development, not toward generating genuinely different design outcomes. Regenerative and Nature-informed design (for example, biomimicry-based planning, water-integrated infrastructure) requires expertise which no single board appointment can be expected to hold. Regenerative and biomimicry-based design is explicitly understood within the architectural profession as requiring interdisciplinary collaboration (architects, engineers and biologists working together from the outset rather than a single specialist consulted after a design is already set).¹⁹ A voice of Nature mechanism, following the precedent set by NICW's model (see [National Infrastructure Commission for Wales](#) below) is designed to convene a range of relevant expertise.

The experience of Forest City 1 (see [Forest City 1](#) below) illustrates this distinction. While initially it was verbally suggested that their Nature expert would be a 'voice of Nature' the final report only included Nature in one chapter. The Nature chapter included strong ecological design principles, but because the governance model did not embed Nature's representation across the wider project, the inclusion of a Nature expert did not consistently influence the other sections of the report.

¹⁸ Simeon Rose quoted in Lawyers for Nature, [Developing Principles for Nature Representation in Public Sector Governance: The Nature Guardian Pilot in National Infrastructure Commission for Wales](#) (January 2026)

¹⁹ Pawlyn, M., Biomimicry in Architecture, RIBA Publishing

d) Ecological standpoint and timescale vs. present-day compliance

An environmental specialist will bring a valuable but fundamentally human-centric standpoint, typically anchored to compliance against present standards (Biodiversity Net Gain metrics, today's Local Nature Recovery Strategy, the existing scientific baseline) and, like any board or officer role embedded in institutional structures, oriented toward electoral cycles, career tenures and annual reporting. A Voice of Nature mechanism is mandated to represent the water and ecosystem's interests from what the system itself requires rather than how development can best accommodate it and on the timescales those systems actually operate on (decades for aquifer recharge, generations for soil and habitat formation). The Voice of the River would be accountable to the river's rights, and their decision making can be evaluated by reference to ecological indicators and thresholds, as well as any applicable river rights charters. Combined with its ongoing right to convene expert input as conditions and scientific breakthroughs evolve, this role is better equipped to keep pace with escalating ecological pressures over the GCDG's 25 year mandate. This shift in standpoint is required to generate genuinely novel design responses and meet the 'future-generations' standard cited in the GCDG's objectives rather than better-managed versions of conventional ones, allowing the GCDG to remain the aspired for national exemplar across its full lifespan. (From Councillor Payne on the Cambridge City Council Rights of the Cam motion: *"If Cambridge is to be at the forefront of the government's plans for growth, it would be highly embarrassing... if our iconic river becomes a muddy trickle."*)

e) Holistic integration vs fragmentation

The GCDG exists to overcome fragmented resources across existing institutions yet responsibility for the Cam's own health is split across seven different bodies²⁰, a fragmentation which an "environment" board member is likely to replicate rather than resolve, reviewing matters on a siloed, case-by-case basis. An ordinary board member's remit will be limited to the GCDG's administrative boundary, unlike the water system that the GCDG's area depends on. Cambridge's water supply already depends on sources outside it (Grafham Water, the proposed Fens Reservoir), and impacts within the boundary are felt downstream in the Fens and wider Ouse system beyond it. A Voice of the River would treat the catchment as one connected system, regardless of administrative lines.

Rights of Nature Precedents

a) UK Councils

In the UK over 19 councils have recognised the rights of their local rivers since Lewes District Council for the River Ouse in 2025, and 40 more are considering them.²¹ The [UK River Rights Network](#), which produces [briefing materials](#), says that *"recognising the Rights of Rivers is not a radical legal leap - it's an evolution of stewardship. It gives existing partnerships, councils and regulators a coherent, values-driven framework for action that can: improve environmental outcomes, strengthen democratic legitimacy, and restore trust in how we care for our shared waters."*²²

²⁰ See Cambridge City Council, ["Rights of the River Cam" motion \(amended, adopted 16 July 2026\)](#), section 2 Responsibility

²¹ UK River Rights Network, [Policy Brief: The State of River Rights in the UK](#) (December 2025)

²² UK River Rights Network, [Resources](#); [Rights of Rivers in the UK: Why It Matters - and How It Helps](#)

b) Council Rights of Nature Framework

In April 2026, [Maidstone Borough Council became the first UK council to formally adopt a Rights of Nature framework](#), embedding the principle that Nature has an intrinsic right to exist, thrive and evolve into its governance and decision-making, woven into its existing Biodiversity Action Plan and Climate Change Action Plan. The framework was explicitly framed as compatible with growth.

c) National Infrastructure Commission for Wales

The National Infrastructure Commission for Wales (NICW - an independent, non-statutory advisory body to the Welsh Government) piloted a six-month "Nature Guardian" role in 2025, appointing Elspeth Jones to represent Nature's interests within its decision-making.²³ NICW's commissioners described the appointment as recognising that *"Nature has been the absent stakeholder, affected by decisions but never truly represented."* The pilot required no legislative change and was explicitly designed as a low-risk, rapidly implementable model - precedent this proposal draws on directly for its advisory-role alternative. NICW's rationale drew on findings that only 50% of Welsh public bodies were complying with their existing statutory biodiversity duty, illustrating that duties and specialist provision alone had not delivered compliance. The Nature Guardian's final report on the pilot explained that²⁴:

"NICW was explicit that a six-month pilot was unlikely to produce clear, measurable outcomes in terms of policy change or infrastructure decisions, both due to the short period of the pilot and due to the nature of NICW's remit. Instead, the evaluation has focused on early signals of cultural and cognitive shift."

Most Commissioners reported that the presence of the Nature Guardian at NICW had had "some" or "significant" influence, both on how they approached their own work at the Commission and on how they perceived other Commissioners to approach their work. The same number (therefore >80%) reported that they had found the experience of working with a Nature Guardian "positive" or "very positive". Notably, half of the Commissioners that responded to the survey reported that the pilot had changed their own personal approach to decision-making "a great deal". Some expressed surprise at the extent to which the Nature Guardian's presence challenged their assumptions, even where they considered themselves already attentive to environmental issues."

Commissioners reported that the lens through which discussions took place become broader, with the presence of the Nature Guardian helping to normalise the idea within NICW spaces that Nature needs to be a core part of infrastructure decision-making and opening up the space for Nature related topics to be raised and explored more frequently."

A perception that small shifts are likely to add up over time. Whilst it wasn't possible to point to major outcome changes during the short six-month pilot, Commissioners reported a sense that an accumulation of small nudges observed during the pilot period would be likely to add up to more significant influence on outcomes over time. As one Commissioner described it, "Like a ship – instead of heading North (say Nature-neutral) it has now shifted a few degrees west in a more Nature-friendly direction. So, on day 1, the outcomes would be identical. By day 150, we are already several km away from where our original course would have taken us."

²³ National Infrastructure Commission for Wales, [Project: Nature on the Board](#) (January 2026)

²⁴ Elspeth Jones, [Nature as a Stakeholder: A Case Study of the National Infrastructure Commission for Wales' Nature Guardian Pilot](#) (January 2026)

d) Lawyers for Nature: Developing Principles for Nature Representation in Public Sector Governance

[Lawyers for Nature](#), who advised on the design of the NICW pilot, have since published guidance for other public bodies seeking to adopt a similar model.²⁵ Their report cautions that creating a new legally embedded statutory office in the public sector can require lengthy legislative negotiation. (The current proposal does not require that. The GCDG's board seats already exist under Schedule 26 of the 1980 Act, and the Secretary of State already has full discretion over their appointment. No new legislation is needed to appoint a Voice of the River representative to an existing seat). Our proposal's design directly addresses these documented weaknesses through its matter designation right, mandatory published reasons, and independent reporting right - going beyond the basic advisory model NICW piloted.

The report says that *"Guardians advocating for Nature in the public sector can act as a way of connecting national strategy with local communities and local Nature recovery work. The specific remit to speak for Nature also means Nature guardians or advocates are focused on the duties and responsibilities the UK government has committed to Nature, thereby strengthening the delivery of legislative policies to restore biodiversity and protect Nature. A Nature Guardian in public sector bodies can help weave considerations for Nature into all decision-making, rather than considerations being made in silos. This can be a way to speed up the process as they do not need to be made by a separate committee or body."*²⁶

e) Forest City 1

The Forest City 1 initiative is a private-sector proposal for a new city of approximately one million residents, seeking Development Corporation status from the UK government. At Forest City's public event in Cambridge in December 2025, project co-founder Shiv Malik described Paul Powlesland of Lawyers for Nature as the project's Voice of Nature and assured that this would maintain the project's integrity from Nature's perspective. In practice, this role was limited to authoring the Nature chapter of the report.²⁷ This chapter set out a Nature-led design vision and proposed that development should identify and protect irreplaceable natural assets before design begins, rather than compensating for their loss afterwards. This illustrates that even large-scale, growth-oriented development proposals are at least claiming to recognise the need for a dedicated Nature voice from the earliest planning stages. The Transport chapter adopted "Give Nature Space" as a core design principle, embedding wildlife bridges, pollinator corridors, blue-green infrastructure and transport intended to restore ecological connectivity rather than merely mitigate impacts. However, the proposal also illustrates the limits of relying on environmental expertise alone. While ecological principles influenced aspects of the report, the Nature author's contributions were not reflected consistently across the other chapters and proposals. This illustrates the distinction between improving environmental outcomes through expert advice and creating a mechanism through which Nature is represented across all decisions.

f) River Wye Catchment Nutrient Board

In April 2025, the [River Wye Catchment Nutrient Management Board appointed ecologist Louise Bodnar as the Voice of the River Wye](#), with a formal role to represent the river's interests, act as its advocate, and vote on its behalf in Board decisions.

²⁵ Lawyers for Nature, [Developing Principles for Nature Representation in Public Sector Governance: The Nature Guardian Pilot in National Infrastructure Commission for Wales](#) (January 2026)

²⁶ Lawyers for Nature, [Developing Principles for Nature Representation in Public Sector Governance: The Nature Guardian Pilot in National Infrastructure Commission for Wales](#) (January 2026) 12

²⁷ Forest City 1, [We Can Build a City](#) (April 2026)

g) Usk Catchment Partnership

In June 2024, the [Usk Catchment Partnership appointed We Are Nature Based CIC as Nature Guardian](#) to its core group, directly informing the Catchment Plan. Guardian Tom Johnston [said](#): *"the one voice that isn't directly and independently in that room... is Nature's voice" — the Guardians' task is not to claim to speak definitively for Nature, but to keep the question of what the river needs at the centre of the Partnership's decision-making.*

h) River Roding

In [2025 the Roding, Beam and Ingrebourn Catchment Partnership voted in favour](#) of seeking a person to act as a voice for the River Roding at future quarterly meetings of the partnership.

i) Faith In Nature

In August 2022, [Faith in Nature became the first company globally to put Nature on its board](#), amending its articles of association to commit *"to have a positive impact on Nature as a whole and to minimise the prospect of any harmful impact... on Nature."* Its Nature Director, represented by human guardians, holds the same formal rights as any other director: to speak and vote on any issue, access all information, consult external experts, and call for advisory committees. The company also created a "Nature Related Matter" designation, giving the Nature Director enhanced time and access to information on any issue it flags as directly affecting Nature and grants an unfettered right to write the Nature Director's own section of the company's annual report, free of board editorial oversight.

- In the [first year](#) of the Nature Guardian role, Nature voted for a plan to enter palm oil production. When this was discovered to be unviable, Nature voted in favour of a pivot to a palm oil research partnership instead. In [Year 2](#), when the research project resulted in a recommendation for a prohibitively expensive palm oil investment, Nature agreed with the rest of the board not to proceed, on the condition that the funds be ring fenced for researching alternative regenerative oils. This demonstrates that the Nature Guardian does not need to block commercial decisions.
- The [Year 2 report](#) demonstrates nature-positive sourcing as commercial differentiation (notably some of these changes were initiated by staff once the cultural norm was embedded rather than requested by the board). The [Year 3 report](#) indicates that Nature's interests were linked to supply chain resilience and that the Nature Guardian did not block infrastructure scaling.

While this is a private company example, Simeon Rose from Faith in Nature wrote a report for NICW explaining why he thought it could be transferable to the public sector.²⁸

j) Yarra River

In Australia, the [Yarra River Protection \(Wilip-gin Birrarung murrn\) Act 2017](#) established the [Birrarung Council](#) as an independent statutory body providing advice to government, advising the Minister for Water on the [Yarra Strategic Plan](#), providing advice in response to requests from the Minister for Water, initiating advice on matters of importance to Birrarung and [reporting annually](#) to the Victoria Parliament. An academic case study specifically analyses this as an example of "more-than-human considerations" shaping planning outcomes.²⁹

²⁸ Simeon Rose [A Commissioner for Nature](#) (2024)

²⁹ Judy Bush, Andréanne Doyon, [Planning a just nature-based city: Listening for the voice of an urban river](#), Environmental Science & Policy Volume 143 (2023)