

Raising the bar: improving nature in our National Parks



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A report by Campaign for National Parks
June 2018

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Acknowledgments

This research was completed with financial support from John Ellerman Foundation and the Martin Wills Wildlife Trust and we are grateful to both organisations. We would also like to thank the many people who devoted their time to discussing this work with us and feeding in their views. The report is, however, solely the views of Campaign for National Parks.

Executive summary

The thirteen National Parks in England and Wales¹ are among the most beautiful and valued landscapes in the British Isles. They contain breath-taking scenery, rare wildlife and cultural heritage, and provide space for a wide range of recreational opportunities. Visiting the Parks offers a chance to experience dark skies and tranquillity. They are, therefore, valuable in supporting our health and well-being, offering a chance to ‘get away from it all’. They are also home to rural communities and are important to the rural economy.

The Parks are extremely important to wildlife and their international recognition depends on their role in relation to nature conservation. Wildlife rich landscapes are also an essential part of the National Park purposes – wildlife is a critical component of natural beauty and people’s enjoyment of the Parks. In a survey we undertook in 2016 that included asking people what, if anything, would improve the Parks, the strongest themes that came out were improving the conservation of wildlife and making them ‘wilder’.

The Parks are not, however, perfect and an important part of Campaign for National Parks’ role is to be ambitious about the potential to improve them. From reports such as the *State of Nature 2016* and *Britain’s Mammals 2018* we also know that wildlife is in serious decline. The National Parks are not generally bucking those national trends.

We believe the Parks should be raising the bar on nature and, through innovative, landscape scale approaches, demonstrating how the declines in wildlife can be halted and reversed. This report considers how that might be achieved.

Scope of the report

As we work towards leaving the European Union we recognise the importance of future policies, protections and funding. The uncertainty due to Brexit is a challenge. These changes also present opportunities. The aim of this report, however, is to consider whether there are other issues, barriers and potential solutions that also need consideration to enable change to happen on the ground in the short, medium and long term. While a future sustainable land management policy in both England and Wales will be critically important to achieving our aim of more resilient Parks, teeming with wildlife, this report identifies other important policy levers at both the local and national levels.

Background

Some believe that the *National Parks and Access to the Countryside Act 1949* created a distinction between landscape conservation based on public appreciation and enjoyment, and wildlife and nature conservation based on scientific assessment. The crucial reports written in the 1940s that underpinned the creation of the Parks recognised, however, the importance of these areas for both landscape and nature conservation.

In the 1990s, Campaign for National Parks published a report, *Wild by Design*, which explored how wilder areas could be created within the Parks. Importantly, this report noted that wildlife objectives could not be considered in isolation, but rather needed to be integrated with the conservation and

¹ While the Norfolk and Suffolk Broads is designated under different legislation, as set out in more detail on page 11, we include it in this report as part of the National Parks family.

enhancement of the landscape and cultural heritage of the Parks, with promoting understanding and enjoyment and taking into consideration the local communities living within the Parks.

Historically, nature conservation efforts in Britain have largely focused on manipulating relatively small pockets of semi-natural habitats with the objective of maintaining communities at a certain stage in the process of ecological succession². This essentially means that rather than evolving to a climax community, these habitats are being managed at earlier succession stages, in order to maximise biodiversity and maintain the nature conservation interest associated with particular wildlife habitats. The Lawton report, published in 2010, considered wildlife sites in England and whether they were capable of responding and adapting to the growing challenges of climate change. The report argued that a step-change in approach to wildlife conservation was needed, meaning a move towards one of large-scale habitat restoration and recreation, under-pinned by the re-establishment of ecological processes and ecosystem services.

Due to devolution the policy context for National Parks in England and Wales is different. The review of English designated landscapes, announced as part of the 25 Year Environment Plan, and the recent statements about the role of designated landscapes in Wales both, however, present important opportunities for the future of the National Parks. We must harness these opportunities, be ambitious about enhancing the Parks and being explicit about the role they can and should have in relation to halting and reversing declines in biodiversity.

Where are we now?

Wildlife is a critical component of the beauty of the Parks and the Parks are important for wildlife. They contain land that is designated for its national and international value for nature conservation. We know, however, that the National Parks are not bucking the national trends of decline in species and the ongoing degradation of habitats.

Many factors have resulted in changes in the UK's wildlife, but agricultural change is seen as the most important driver of declines. Climate change is also recognised as having significant impacts, but these impacts have been both beneficial and detrimental. These factors affect all of the English and Welsh Parks.

The Parks face a number of other pressures and challenges and these vary from Park to Park. It is important that these pressures are identified and tackled at the local level. A key tool for doing this is through National Park management plans. Our analysis of management plans highlights, however, that the challenge of declines in wildlife within the Parks is not well articulated and different approaches are taken in terms of detailed objectives, policies and strategies for halting and reversing declines in wildlife and the improvement of degraded habitats.

What is preventing us from making the ecosystems within the Parks healthier and more abundant with wildlife?

To inform this report we discussed with a range of experts the barriers they believe exist that currently prevent action to improve wildlife and ecosystems within the Parks.

A wide range of challenges are identified and discussed in chapter four. These included policy levers and who is able to make change happen; understanding and recognising that there is a problem; nervousness and resistance to change and, related to that, the importance of language; current

² Succession is the process of change in ecological communities over time towards a natural climax, for example from grassland to scrub and then to woodland.

approaches to nature conservation; and monitoring so there is an understanding of what success would look like and whether or not improvements are being achieved.

Opportunities for improvement

Funding is important in terms of incentivising, promoting and enabling changes in land management but chapter five draws on the challenges identified in chapter four and considers what other opportunities exist to enable improvements in species and habitats within the Parks.

The value of advice, including through peer to peer advocates, is discussed as is the importance of partnership working to achieve changes in the Parks. There is a need to engage stakeholders and the public at a local level but also for partnerships to be ambitious. Using the right language and terminology will play a role in getting support for ambitious visions for change.

While we do not underestimate the importance of partnerships, we identify the need for local and national leadership. National Park Authorities should be at the forefront of taking or facilitating action to improve nature, which should be reflected in strong and specific policies in management plans. These plans should identify opportunities for, and include specific targets on, habitat enlargement, improving the connectivity of different habitats and tackling declines of key species. Areas within the Parks that could be managed less intensively, so people have opportunities to visit areas of the Parks that feel relatively wilder, and natural processes are allowed to flourish, should also be identified. This would need to be underpinned by funding for the delivery of public goods.

There is a clear need for leadership at the national level too. The Parks offer opportunities for innovative approaches and Natural Resources Wales and Natural England should work with the Park Authorities to pilot new approaches to nature conservation. The need for this was identified in the Lawton report but remains relevant today and needs to be implemented urgently. The Westminster and Welsh Governments also need to make sure existing European protections are retained if not strengthened. Changes in legislation to enable more action on wildlife crime are also needed.

Conclusions and recommendations

As vast tracts of land the National Parks should deliver more for wildlife with opportunities to apply innovative and joined up approaches to nature conservation and land management. Working in partnership, including with land owners and managers, will be crucial to achieving change. There is also, however, a critical need for local and national leadership. Local and national policies and strategies must be ambitious about the future of the National Parks and the opportunities they present for healthier, more functional ecosystems and opportunities to experience relatively wilder areas of the countryside.

To achieve this, Campaign for National Parks believes a number of changes at the national and local levels need to be made. We will campaign, in partnership with relevant organisations including the National Park societies, to secure the following **locally focused recommendations**:

- i. **National Park Authorities should demonstrate more leadership and ambition on raising the bar on enhancing nature within their Park.** One means of doing this will be through management plans, which should include specific goals and targets for habitat improvement and/or creation and species population recovery. Plans should also include a spatial representation that sets out which policies are a priority for different areas of the Parks. This should include opportunities for expanding and linking up fragmented habitats, supporting

natural processes to flourish and enhancing natural capital and, where relevant, the removal of invasive or inappropriately located species.

Opportunities to support reintroduction programmes should also be identified and where illegal persecution of raptors is an issue, this should be included as a clear priority for action.

Where significant changes in the extent of habitats, or abundance and/or diversity of species are identified proposals should be modelled to help articulate the positive impact of these changes. Such an approach should seek to address any concerns about proposed changes, for example concerns about increases in woodlands and trees having a negative impact on landscape character.

The implementation of this vision and policies should be underpinned with financial support from a future, locally tailored environmental land management policy.

- ii. **National Park Authorities should identify an area, or areas, within which they will implement policies to make the areas feel relatively wilder.** This will include working with landowners and managers, so land is managed less intensively and natural processes support more robust, functional ecosystems. Links should also be made to local plan policies so intrusion from light and noise pollution can be minimised. Wildlife should be monitored within these areas and a 'control' area established outside of the area to understand the impact of the change in management.

The extent to which the area(s) will feel 'wild' will vary from Park to Park but within each Park, all of which are vast tracts of land, areas that are managed more extensively should be identified. This should be supported by funding through future environmental land management policy.

We will campaign to secure the following **nationally focused recommendations**:

- iii. **Natural England and Natural Resources Wales should work with the National Parks to trial a new approach to conservation** that focuses on the re-establishment of natural ecosystems and enhancing natural capital. The outcomes for wildlife and people should be monitored closely to inform future approaches to nature conservation.
- iv. **Future payments for farmers and land managers should be locally tailored and environmentally focused.** Future sustainable land management policies should protect and enhance natural capital, thereby recognising the role farmers and land managers have in delivering clean air and water, reducing flood risk, carbon sequestration, biodiversity and public access, integral to maintaining these beautiful, cultural landscapes that are valued by much of the public.
- v. To ensure that the many sensitive and important areas for nature in National Parks can be safeguarded, **it is essential that protections for nature are maintained after the UK leaves the European Union.**
- vi. To better protect birds of prey, and wildlife more widely, and restore the ecological integrity and vitality of our blanket peatlands and upland dwarf shrub heaths, **the Westminster and Welsh Governments should introduce a system of licensing of driven grouse shooting.** This should also be accompanied by the use of vicarious liability to uphold accountability within any new regulatory system.

- vii. **A new suite of environmental outcomes should be developed for England and Welsh National Parks** to better prioritise the need for habitats to be bigger and better connected and ecological networks to be more resilient. Progress against the suite of outcomes should be monitored on an annual basis and be made publicly available.

Chapter 1 - Introduction

'The landscape...derives its characteristic form and beauty from the underlying physical and geological structure of its mountains, hills and valleys. Its surface is clothed and coloured by a complex of intricately related plant and animal life which draws its sustenance from varied types of soil, and depends for its seasonal rhythm of growth, decay and regeneration on climate and rainfall, and on drainage and river systems.'

Hobhouse report, 1947 [page 60]

Campaign for National Parks is proud of its role in securing legislation in the 1940s that led to the creation of the National Parks in England and Wales. Our founders believed that areas of the country needed to be protected for the good of the nation – to ensure that the beauty of these areas would be preserved but also to make sure they were accessible for everyone to enjoy.

Today, the thirteen National Parks³ are among the most beautiful and valued landscapes in the British Isles. They contain breath-taking scenery, rare wildlife and cultural heritage. The Parks are home to rural communities and are important to the rural economy. The Parks also provide space for a wide range of recreational opportunities and are a chance to experience dark skies and tranquillity. They are essential to the nation's health and well-being, offering chances to 'get away from it all'.

As we approach the 70th anniversary of the legislation that underpins the English and Welsh National Parks, the Parks remain as important and valuable as ever. We would not claim, however, that the Parks are perfect as they are. **We want to make the Parks even more beautiful.**

The original first purpose of the National Parks in the 1949 Act was stated as 'preserving and enhancing the natural beauty of the areas' [section 5] and natural beauty was defined as 'including flora, fauna, and geological and physiographical features' [section 114(2)]. We recognise that many people interpret beauty as a visual concept. We, however, use this term in the broader sense, as originally set out in the legislation. In striving to make the Parks more beautiful we recognise the broad range of special qualities for which the Parks are designated. We want the quality of the landscapes in these areas to be high, but important components of the landscapes are that they should be teeming with wildlife, contain healthy, functional ecosystems and mosaics of habitats, contain important cultural heritage, mitigate the impacts of climate change, provide opportunities for public recreation and be home to rural communities and businesses. We believe these ambitions can and should be compatible.

Achieving all of these aims will be challenging. Land is a finite resource with many demands on it. The Parks receive over 100 million visitors a year⁴ and this in itself causes challenges in terms of sustainable management of the Parks. It also presents opportunities, however, in terms of rural tourism and the local economy. We recognise that there is not a simple solution or means of enhancing the Parks, but we must still strive to make the Parks even better.

³ While the Norfolk and Suffolk Broads is designated under different legislation, as set out in more detail on page 11, we include it in this report as part of the National Parks family.

⁴ 12 million in Wales (<http://www.cprw.org.uk/images/user/Valuing-Wales-National-Parks-.pdf>) and 94 million in England (http://www.nationalparksengland.org.uk/_data/assets/pdf_file/0015/1070313/INFOGRAPHIC-2017-hi-res.pdf)

1.1 National Parks that contain more diverse and abundant wildlife

In 2016, as part of celebrating Campaign for National Parks' 80th anniversary, we undertook the *Big Conversation*. This was an online survey that sought views about what people liked about the Parks at the moment, how they used the Parks and what, if anything, might make them even better.

We received almost 10,000 responses to the survey and gathered a large amount of valuable information. The strongest themes that came through in terms of what would make the Parks even better were improving the conservation of wildlife and making them 'wilder' (39% and 29% respectively of the 7,148 respondents who identified themselves as not living or working in a Park but having visited in the last five years identified these options)⁵. In light of the diversity across the National Park family, achieving Parks that contain more wildlife or feel wilder will mean different approaches and priorities in, for example, Snowdonia compared with the South Downs. The focus should also be on increasing the diversity and abundance of appropriate habitats and species, rather than simply any species; non-native invasive species may, for example, need to be controlled and removed.

It is also important to be aware that the continued international recognition of our National Parks as protected areas by the International Union for Conservation of Nature (IUCN) is dependent on primacy being given to conservation, and specifically nature conservation. While the retention of the Sandford Principle⁶ is an important part of the policy mechanism for achieving that in decision making, more could and should be done in practice to reflect the importance of nature conservation within the Parks.

The *State of Nature 2016* report⁷ stated that **the UK has lost significantly more nature over the long term than the global average and that we are among the most nature-depleted countries in the world**. A recent review found that almost one in five of British mammal species face a high risk of extinction⁸. As large tracts of land, the National Parks should be an important part of addressing these issues. We want the Parks to be home to more diverse, abundant, thriving and resilient wildlife and habitats. We believe this would make the Parks even more beautiful.

1.2 The scope of this report

There are many examples of positive wildlife projects within the English and Welsh Parks. This includes the Two Moors Threatened Butterfly project on areas of Dartmoor and Exmoor, which was led by Butterfly Conservation, and the Brecon Beacons Mega Catchment project, initiated by Welsh Water. We also receive nominations for a number of biodiversity focused projects each year as part of our Park Protector Award, including the Fen Raft spider project in the Norfolk and Suffolk Broads.

Wildlife across the UK is, however, declining and the Parks are not bucking those trends. This is despite the investment and additional protections these areas receive. Campaign for National Parks believes there is an opportunity for the Parks to be test beds for landscape scale, innovative, new approaches that will raise the bar on nature.

⁵ Campaign for National Parks (2016) *A Big Conversation about National Parks: the findings of our survey*

⁶ The Sandford Principle is a long-established mechanism for ensuring that priority is given to the conservation of National Parks where there are irreconcilable conflicts with other purposes and duties.

⁷ Hayhow et al (2016) *The State of Nature 2016*

⁸ Report by the Mammal Society for Natural England et al (2018) *A review of the population and conservation status of British mammals: a technical summary*

The future of farming, food and the environment as we work towards leaving the European Union is a source of significant uncertainty but it also presents important opportunities in relation to this work. We, along with many other organisations, are working to influence the future of funding for sustainable land management post the Common Agricultural Policy.

Areas of the Parks also currently benefit from European level designations, including Special Areas of Conservation under the Habitats Directive and Special Protection Areas under the Birds Directive. Our concerns about the potential loss of the protections the EU directives provide are shared across the environmental sector and we are supporting work being led by partners to influence the future legislation.

We recognise the importance of future policies, protections and funding, and the challenges and opportunities they present. Based on current commitments, both the Westminster and Welsh Governments have stated they will pay direct payments in 2019 as usual and a transition period will begin in 2020⁹. While the exact length of transition periods have not yet been confirmed, the aim of implementing a new scheme by 2025 has been suggested. Within the transition phases there may be scope to pilot new schemes, and improve existing schemes, but this is not the focus of this report.

This report considers whether there are other issues, barriers and potential solutions that also need consideration to enable change in the short, medium and long term.

1.3 Approach to developing this report

To inform the development of this report we hosted a policy roundtable in February 2017. Since then we have had a wide range of discussions with academics, civil servants, NGOs and land managers and undertaken desk based research.

We are grateful to everyone who dedicated their time to discussing this work with us and feeding in their views. The report is, however, solely the views of Campaign for National Parks.

⁹ Statement by Lesley Griffiths on 7 May 2018 - <https://gov.wales/newsroom/environmentandcountryside/2018/180508-lesley-griffiths-sets-out-timetable-for-basic-payment-scheme-post-brexid/?lang=en> and Defra (2018) *Health and harmony: the future for food, farming and the environment in a Green Brexit*

Chapter 2 - Background

‘Substantial improvements in environmental quality are needed in many Parks; landscape deterioration needs to be reversed; wildlife habitats conserved more actively, and the tensions with local communities addressed positively and creatively. We foresee the importance of ‘wilderness’ becoming more widely recognised, as people seek to escape the pressures of twentieth century life.’

Edwards report, 1991 [page 7]

2.1 Changing purposes

Many argue¹⁰ that the *National Parks and Access to the Countryside Act 1949* created a distinction between landscape conservation based on public appreciation and enjoyment, and wildlife and habitat conservation based on scientific assessment. National Parks fell under the former, while National Nature Reserves and Sites of Special Scientific Interest came under the latter. The Hobhouse report¹¹ noted, however, the importance of the Parks to nature conservation. And, prior to that, the Dower report suggested that National Parks in Great Britain should be defined as:

‘An extensive area of beautiful and relatively wild country in which, for the nation’s benefit and by appropriate national decision and action, a) the characteristic landscape beauty is strictly preserved, b) access and facilities for public open-air enjoyment are amply provided, c) wildlife and buildings and places of architectural and historic interest are suitably protected, while d) established farming use is effectively maintained.’¹²

In 1991 a panel, chaired by Professor Ron Edwards, was appointed by the Countryside Commission to review the National Parks of England and Wales. The review was wide-ranging and included considering the theme of nature conservation within the Parks. The panel noted that the term natural beauty is defined in the 1949 legislation as ‘including flora, fauna, and geological and physiographical features’ but, however, that the first purpose tended to be interpreted as a ‘largely visual concept’ that was not generally seen to cover cultural associations¹³. The report included a number of recommendations to support improvements. One was a change to the wording of the National Parks first purpose to address this issue. Importantly, they also recommended the creation of ‘influential and well-resourced Park Authorities that can take the lead in influencing local land management’.

Campaign for National Parks was actively involved in campaigning for new legislation in the 1980s and 1990s. While the priority for the campaign was the need for independent and properly resourced National Park Authorities with planning powers, and securing a presumption against development within the Parks, we also supported the need for refreshed purposes. Working with our then vice president, Lord Norrie, we were instrumental in securing sections of the legislation that would deliver these asks. Lord Norrie originally introduced a Private Member’s Bill, on which government support was secured, and the National Parks sections were then taken forward through the Environment Bill.

¹⁰ See for example chapter four, Fiona Reynolds (2016) *The fight for beauty: our path to a better future*

¹¹ Hobhouse et al (1947) *Report of the National Parks Committee (England and Wales)*

¹² Dower J (1945) *National Parks in England and Wales*

¹³ Edwards et al (1991) *Fit for the future: report of the National Parks review panel*

In 1995 the *Environment Act* revised the National Park's statutory purposes. The first purpose was amended to explicitly refer to wildlife and cultural heritage, alongside natural beauty. The legislation also created National Park Authorities.

Box 1 – National Park purposes

England and Wales

The *Environment Act 1995* revised the original legislation and set out two statutory purposes for National Parks in England and Wales. These are:

1. Conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas; and
2. Promoting opportunities for the understanding and enjoyment of the special qualities of the areas by the public

The National Park Authorities were established to pursue the same purposes but they also have an additional duty on them, which states when carrying out the purposes they shall also 'seek to foster the economic and social well-being of local communities within the National Parks, but without incurring significant expenditure in doing so'.

The Broads

The Broads was given equivalent status to that of a National Park by the *Norfolk and Suffolk Broads Act 1988*. The general duty of the Broads Authority is to manage the Broads for the same purposes as the National Parks, but also an additional purpose of 'protecting the interests of navigation'.

The legislation also states that in undertaking its function, the Authority shall have regard to:
(a) the national importance of the Broads as an area of natural beauty and one which affords opportunities for open-air recreation;
(b) the desirability of protecting the natural resources of the Broads from damage; and
(c) the needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads.

Interestingly, the Marsden review of the designated landscapes in Wales¹⁴ recommended a further updating of the purposes of the Welsh National Parks. Welsh Government commissioned the panel to 'appraise and better understand whether the designations, purposes, management arrangements and governance of Wales' designated landscapes are best-placed to meet the challenges of today, as well as those in the future' [page 27]. In its final report, published in July 2015, the panel recommended three, interlocking purposes, the first of which was a 'conservation purpose'. The recommended wording for it was 'to conserve and enhance the distinctive landscape and seascape qualities of the area' [recommendation six].

The purpose was accompanied by the following footnote:

'Where 'landscape' incorporates the total natural environment of the area, together with its biodiversity, human settlements and cultural aspects. It is particularly important to stress the significance of progressing bio-diversity protection and restoration in the Conservation Purpose

¹⁴ Marsden et al (2015) *National Landscapes: realising their potential*

and to promote progress towards international standards relating to the International Biodiversity Convention so far unattained in Wales. This also incorporates the European Landscape Convention (Council of Europe, 2000) definition as ‘an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors’ (Article 1a.). And it assumes the enhancement of ‘actions to conserve and maintain the significant or characteristic features of a landscape, justified by its heritage value derived from its natural configuration and/or from human activity’ (Article 1d.).’

The recommendation was not taken forward by Welsh Government, but a further review was published in 2017. The *Future Landscapes*¹⁵ report did not make a recommendation about the specific wording of new purposes, but argued for new legislation that would recognise the special qualities of the designated landscapes in Wales and relate them more formally to the achievement of the sustainable management of natural resources [page eight]. In a statement at the Senedd in March 2018, the Environment Minister, Hannah Blythyn AM, confirmed the Government’s intention to retain the existing purposes of the Parks at this time¹⁶.

2.2 Wild by Design

The Edwards report also made a recommendation, which was endorsed by the government at the time, that ‘a number of experimental schemes on a limited scale should be set up in the National Parks, where farming is withdrawn entirely and the natural succession of vegetation is allowed to take its course.’

In the late 1990s, Campaign for National Parks published *Wild by Design*, which explored how the proposal to create wilder areas within the Parks could be taken forward. This work was undertaken in the context of the statutory purposes, meaning that the consideration of wildlife objectives were integrated with the conservation and enhancement of the landscape and cultural heritage of the Parks, and with promoting understanding and enjoyment. The implications for the local economy and communities were also recognised.

In light of the current debate about rewilding, one might argue that this report was before its time. The report notes that there is ‘no consensus on the definition of ‘wilder areas’’ and uses the relative term ‘wilder’ to recognise that true wilderness is elusive in England and Wales [page 2]. Three broad possibilities for what could be done to make areas feel ‘wilder’ were identified:

1. Enhance existing habitats, for example extensification or removal of domestic stock grazing;
2. Re-create specific former natural and semi-natural habitats, for example broad-leaved woodland creation and moorland creation; and/or
3. Allow new habitats to develop – ‘future natural’, meaning accepting the species composition that establishes including the absence of species that may have existed before.

The report also recognises the importance of scale, but does not discount small scale projects:

‘A wilderness experience has very special qualities that can be encountered in a range of different scenarios from a small pocket of dense woodland to vast open landscapes of heather moorland. The elements that make an area evoke this experience are diverse but principally include a sense of closeness to nature, freedom, solitude and even a sense of danger and challenge’ [page 8].

¹⁵ Elis-Thomas et al (2017) *Future Landscapes: delivering for Wales*

¹⁶ Statement made on 13 March 2018 - <http://record.assembly.wales/Plenary/4912#A42263> (accessed 15 May 2018)

It is essential to recognise that making the Parks more biodiverse and making them feel wilder are not necessarily one and the same aim¹⁷.

Historically, nature conservation efforts in Britain have largely focused on manipulating relatively small pockets of semi-natural habitats with the objective of maintaining communities at a certain stage in the process of ecological succession¹⁸. This essentially means that rather than evolving to a climax community, these habitats are being kept at earlier succession stages, in order to maximise biodiversity and maintain the nature conservation interest associated with particular wildlife habitats. This suggests that, in some cases, aspirations to make the Parks relatively wilder and more biodiverse may not always coincide.

Wild by Design included the conclusion that:

‘Creative conservation and wilder area creation have a role to play in National Parks conservation strategies by reinforcing existing habitats through extending and interconnecting them. This will become increasingly important as factors such as [climate change] threaten to degrade relatively small and isolated sites. Smaller scale improvements within the matrix of the managed countryside are already happening. It would be great benefit to expand the existing mechanisms, allowing more ambitious projects to be undertaken’ [page 42].

The report also noted the potential of lower intensity land use being encouraged, where appropriate, to enhance landscape and wildlife value.

The theme of reinforcing habitats by extending and interconnecting them were subsequently picked up in the 2010 report, *Making space for nature*¹⁹, which considered wildlife sites in England and whether they were capable of responding and adapting to the growing challenges of climate change. The report argued that a step-change in approach to wildlife conservation was needed. This meant moving from ‘trying to hang on to what we have, to one of large-scale habitat restoration and recreation, under-pinned by the re-establishment of ecological processes and ecosystem services, for the benefits of both people and wildlife’ [page ii].

The Lawton report identifies the National Parks as an important part of England’s ecological network, particularly through ‘enhancing the resilience of the network by providing large areas of high quality wildlife habitat’ [page 39].

2.3 Current context in England

In January 2018 the Prime Minister launched the 25 Year Environment Plan²⁰, which sets out a long term approach to protecting and enhancing England’s landscapes and habitats for the next generation. The plan lists six goals that will help the natural world ‘regain and retain good health’:

- i. Clean air;
- ii. Clean and plentiful water;
- iii. Thriving plants and wildlife;
- iv. A reduced risk of harm from environmental hazards such as flooding and drought;
- v. Using resources from nature more sustainably and efficiently; and
- vi. Enhanced beauty, heritage and engagement with the natural environment.

¹⁷ Jarman R (1995) *Habitat restoration – recanting the status quo* ECOS 16(2) pp29-38

¹⁸ Succession is the process of change in ecological communities over time towards a natural climax, for example from grassland to scrub and then to woodland.

¹⁹ Lawton et al (2010) *Making space for nature: a review of England’s wildlife sites and ecological networks*

²⁰ HM Government (2018) *A green future: our 25 year plan to improve the environment*

The policy commitments most explicitly linked to designated landscapes sit within the sixth goal on beauty. In order to conserve and enhance natural beauty, for example, the Westminster Government committed to commissioning a review of the designated landscapes for the 21st century.

The Parks have an important role to play, however, in achieving all six of the goals. To deliver the goal of thriving plants and wildlife, for example, the plan sets out commitments to publish a strategy for nature, develop a Nature Recovery Network and provide opportunities for the reintroduction of native species. The Recovery Network is set out as a means of delivering the recommendations of bigger, better and more joined up from the Lawton review. Improving the health and resilience of the habitats within our Parks, especially in the uplands, will support the delivery of clean and plentiful water. All of these goals, and the many policies that underpin them in the plan, provide opportunities for the National Park Authorities to be ambitious about enhancing the Parks.

The terms of reference²¹ for the review of designated landscapes were published in late May 2018. They state that the review will examine and make recommendations on the following objectives:

- The existing statutory purposes for National Parks and AONBs and how effectively they are being met
- The alignment of these purposes with the goals set out in the 25-Year Plan for the Environment
- The case for extension or creation of new designated areas
- How to improve individual and collective governance of National Parks and AONBs, and how that governance interacts with other national assets
- The financing of National Parks and AONBs
- How to enhance the environment and biodiversity in existing designations
- How to build on the existing eight-point plan for National Parks and to connect more people with the natural environment from all sections of society and improve health and wellbeing
- How well National Parks and AONBs support communities

2.4 Current context in Wales

In Wales, the *Environment (Wales) Act 2016* established the legislative framework for the 'sustainable management of natural resources'. Section three of the Act defines the term as meaning using natural resources in a way and at a rate that maintains and enhances the resilience of ecosystems and the benefits they provide. The legislation states that in doing so, the objective is to meet the needs of present generations without compromising the ability of future generations to meet their needs, and contribute to the achievement of the seven well-being goals in the *Well-being of Future Generations Act 2015*²².

An important part of the framework was also a requirement that Natural Resources Wales publish a State of Natural Resources Report. In publishing the first report, Natural Resources Wales stated the report had three purposes. Firstly to provide an evidence base for policy development. Secondly, to inform discussions about area statements (another requirement of the Environment Act) and thirdly, to provide 'a platform from which to launch discussion, engagement and collaboration about the

²¹ Terms of reference available at <https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review/terms-of-reference> (accessed 13 June 2018)

²² See [https://www.wcva.org.uk/what-we-do/the-future-generations-\(wales\)-act-all-you-need-to-know](https://www.wcva.org.uk/what-we-do/the-future-generations-(wales)-act-all-you-need-to-know) for more information. Accessed 11 June 2018

part that we can all play in improving the resilience of our natural resources and ecosystems, so that they can continue to support our well-being for generations to come'²³.

The *Environment (Wales) Act* also introduced a duty requiring public authorities to seek to maintain and enhance biodiversity so far as is consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems. The Welsh Government advises that in order to follow the duty public authorities should 'embed the consideration of biodiversity and ecosystems into their early thinking and business planning, including any policies, plans, programmes and projects, as well as their day to day activities'²⁴.

This legislative framework should present important opportunities for the Welsh National Park Authorities, particularly in terms of engaging with organisations that have an impact on the Parks but have in the past not prioritised the sustainable management of them.

In a statement in mid-March²⁵, the Welsh Environment Minister, Hannah Blythyn AM, recognised the important role of designated landscapes in relation to delivering the Government's ambitious agenda:

'Leading from [the support for the ambition on the sustainable management of natural resources in the Environment Act] is a recognition designated landscapes are well placed to take this agenda forward in their areas because of the diversity of natural resources found within their boundaries, their experience and expertise, and their extensive connections with communities of interest, including people who live and work within their boundaries.'

She also noted, however, that 'if we are to address the environmental challenges we face, we must recognise that designated landscapes must do more to identify, safeguard and realise the benefits from the public goods they protect for all the people of Wales'. To achieve this she outlined a proposal to introduce legislation to apply the principles of the sustainable management of natural resources when preparing management plans.

In mid-April, the Minister made a further statement on the environment in Wales more generally and spoke of the need for 'transformational action' to tackle the trends of decline show by the *State of Natural Resources* report²⁶. To achieve that she set out five priorities:

- reversing the decline in biodiversity;
- working with National Parks and Areas of Outstanding Natural Beauty;
- increasing the number of trees and woodlands;
- accelerating action on air quality; and
- becoming the 'best in the world' on recycling.

Within these priorities, she explicitly called on National Parks and Areas of Outstanding Natural Beauty 'to be exemplars on the sustainable management of natural resources, particularly on biodiversity, trees and woodlands, but also in contributing to the delivery of appropriate solutions of the right scale to improve resource efficiency and decarbonisation in those areas'.

²³ Natural Resources Wales (2016) *State of Natural Resources Report: Assessment of the Sustainable Management of Natural Resources. Technical Report. Natural Resources Wales.*

²⁴ Accessed 21 May 2018 - <https://gov.wales/topics/environmentcountryside/consmanagement/natural-resources-management/environment-act/guidance-for-section-6/?lang=en>

²⁵ Statement made on 13 March 2018 - <http://record.assembly.wales/Plenary/4912#A42263> (accessed 15 May 2018)

²⁶ Statement made on 17 April 2018 - <http://record.assembly.wales/Plenary/4972#A42609> (accessed 14 June 2018)

2.5 Wider context

Part of the current context is also public criticism of the National Parks. Media commentator George Monbiot is perhaps the most out-spoken about his concerns for the Parks, calling the Lake District a “sheep-wrecked monument to subsidised overgrazing and ecological destruction”²⁷ and in 2015, speaking at the National Parks UK conference he argued that the Parks should be “redesignated as ecological disaster zones”²⁸. While we reject Monbiot’s conclusions we do agree the Parks could and should be better for nature and more needs to be done to restore degraded habitats. This report aims to engage people in a sensible debate about how to achieve that but also seeks to encourage more action at the local and national level.

The review of English designated landscapes and the recent statements about the role of designated landscapes in Wales present important opportunities for the future of the National Parks. We must harness these opportunities. To do that everyone with an interest in the Parks needs to be ambitious about enhancing them and the role the Parks can and should have in relation to halting and reversing declines in nature.

²⁷ Accessed 21 June 2018 - <https://www.theguardian.com/commentisfree/2017/may/09/lake-district-world-heritage-site-george-monbiot>

²⁸ Accessed 21 June 2018 - <http://www.monbiot.com/2015/11/06/loved-to-death-2/>

Chapter 3 - Taking stock – where are we now?

'There is a substantial challenge to create resilient ecosystems within and beyond the designated landscapes. But, their restoration can enable the sustainable management of natural resources to underpin social, economic and cultural benefits. The State of Natural Resources Report indicates that no Welsh ecosystems contain all the necessary attributes of resilience, including those in our designated landscapes.'

Future Landscapes report, 2017 [page 15]

3.1 Wildlife within the National Parks

The National Parks are important for wildlife. 56% of the New Forest National Park, for example, is designated of international value for nature conservation. It contains extensive areas of lowland heath, ancient woodland, valley mires, river valleys and coastal marshes that are internationally important²⁹. Over a third of the Peak District is covered by protections for nature conservation³⁰. Snowdonia National Park contains 107 SSSIs, which together represent just under 30% of the Park and approximately 30% of Wales' blanket peat bog is found within the boundaries of Snowdonia National Park³¹.

In September 2017, it was reported that a rare plant, previously thought to be globally extinct, had been rediscovered in the Peak District National Park. Two small populations of the leek-coloured hawkweed, 62 plants in total, were found flowering on the banks of the Monsal Trail, in Chee Dale. This is the only known location in the world that the plant is found³².

As vast tracts of land, the Parks also have a role in achieving the UK's global obligations in relation to nature. This includes the United Nations Sustainable Development Goals, one of which calls for urgent action to be taken 'to reduce the loss of natural habitats and biodiversity which are part of our common heritage'³³. As the ranges of different species change due to climate change, the Parks' role in relation to supporting wildlife may become even more important.

We are aware of many positive, nature focused projects within the Parks. The Two Moors Threatened Butterfly project, for example, which is run by Butterfly Conservation in partnership with a number of organisations and landowners, focused on reversing declines in marsh fritillary, the high brown fritillary and the heath fritillary across Dartmoor and Exmoor. It ran from 2005 to 2016. Populations of the marsh fritillary declined substantially in the UK with 66% of colonies being lost between 1990 and 2000. The butterfly is typically associated with extensive grazing by cattle and ponies, so the project worked with land managers to implement favourable management options

²⁹ Accessed 16 May 2018 - <http://www.newforestnpa.gov.uk/conservation/landscape-partnership/scheme-management/background-to-scheme/>

³⁰ Peak District National Park Authority (2018) *Peak District National Park Management Plan 2018 - 23*

³¹ Snowdonia National Park Authority (2015) *State of the Park report*

³² Accessed 16 May 2018 - <https://www.derbyshirewildlifetrust.org.uk/news/2017/09/06/extinct-plant-rediscovered-peak-district-national-park>

³³ UN Sustainable Development Goals, Goal 15

through agri-environment schemes. Between 2005 and 2016 population trends saw an increase of over 700% based on larval webs³⁴.

Projects are also in place in a number of Parks to monitor and support the recovery of pine marten populations. Pine martens are Britain's second rarest carnivore, after the wildcat, after populations declined dramatically during the 19th century. The Vincent Wildlife Trust reports that while the pine marten population in Scotland is recovering, the situation is markedly different in England and Wales and there is no evidence that pine martens have recovered from their historical decline south of the Scottish border. The Trust has worked for the last 30 years to restore pine martens, including through a project using populations sourced in Scotland to support existing but vulnerable pine marten populations in the Welsh countryside, including Snowdonia³⁵. A project that is part of the Back from the Brink programme, also focuses on pine martens in northern England. In August 2017, a pine marten was caught on camera in the North York Moors after a four-year project³⁶. Pine martens were previously last seen alive in Yorkshire about 35 years ago. In March 2018, video footage also showed that pine martens had returned to the forests of Northumberland³⁷.

Other important examples of landscape scale projects that recognise the importance of habitat restoration include the Brecon Beacons Mega-Catchment project, which is still in its relatively early stages, and the long-running Moors for the Future partnership. The focus of the Moors for the Future partnership stretches from Nidderdale in Yorkshire in the north, down to Kinder Scout in the Peak District National Park and has been running for 15 years. The project works to reverse the damage that has taken place over the last 200 years and resulted in large areas of the uplands in this area bare of vegetation. The aim of the project is to return the moorland areas to their former glory and to enable them to flourish³⁸.

3.2 Bucking the national trends?

While we know good practice and important projects are working to enhance the natural environment within the Parks, we also know that trends in biodiversity across the UK continue to show declines.

The *State of Nature 2016* report³⁹ pools data to give an overview of the state of nature in the UK. The headline finding was that between 1970 and 2013, 56% of species declined, with 40% showing strong or moderate declines, 44% of species increased, with 29% showing strong or moderate increases. These measures were based on quantitative trends for almost 4,000 terrestrial and freshwater species in the UK.

The report considers these trends in more detail for different habitats, including lowland semi-natural grassland and heathland, farmland, upland, urban and woodland. Different Parks are made up from different habitats and trends within individual Parks will vary. We know, however, from evidence such as the statistics in table one below, that the condition of biodiversity within the English Parks is not bucking national trends. In fact, a lower percentage of SSSIs are in favourable

³⁴ Accessed on 16 May 2018 - <https://butterfly-conservation.org/4497/The-TwoMoorsThreatenedButterflyProject.html>

³⁵ Accessed 30 May 2018 <https://www.vwt.org.uk/projects-all/pine-marten-recovery-project/>

³⁶ Accessed on 16 May 2018 - <https://www.theguardian.com/world/2017/aug/07/rare-pine-marten-caught-on-camera-in-yorkshire-for-first-time-in-35-years>

³⁷ Accessed on 16 May 2018 - <https://www.pine-marten-recovery-project.org.uk/news/rare-pine-marten-captured-on-camera-in-northumberland>

³⁸ See <http://www.moorsforthefuture.org.uk/> for further information (accessed 12 June 2018)

³⁹ Hayhow et al (2016) *State of Nature 2016*

condition (25.3%) than the national average (38.5%). While we recognise a higher than average percentage of SSSIs in the Parks is considered to be ‘unfavourable recovering’, this can simply mean the land is currently covered by an agri-environment scheme rather than Natural England being confident the condition of the biodiversity at site is genuinely recovering.

Table 1 – Condition of SSSIs within the English National Parks based on area (data supplied by Natural England – October 2017)

Percentage based on area	Favourable	Unfavourable recovering	Unfavourable no change	Unfavourable declining	Part destroyed	Destroyed
Dartmoor	18.6	79.3	0.0	2.1	0.0	0.0
Exmoor	15.3	81.3	2.8	0.6	0.0	0.0
Lake District	22.8	62.2	10.9	4.1	0.0	0.0
New Forest	52.9	43.2	2.7	1.2	0.0	0.0
North York Moors	11.4	87.8	0.3	0.4	0.0	0.0
Northumberland	33.0	65.7	0.6	0.8	0.0	0.0
Peak District	16.0	80.8	2.4	0.7	0.0	0.0
South Downs	46.9	49.9	2.0	1.1	0.0	0.1
The Broads	63.2	27.5	6.1	3.2	0.0	0.0
Yorkshire Dales	28.0	67.9	4.0	0.0	0.0	0.0
% for all Parks	25.3	70.0	3.4	1.3	0.0	0.0
For all SSSIs	38.5	55.8	3.4	2.1	0	0

We were unable to access up to date, comparable data for the SSSIs in the Welsh Parks but the *Future Landscapes* report acknowledges the ‘substantial challenge to create resilient ecosystems’ within the Welsh designated landscapes. It states [page 15]:

‘The *State of natural resources report* indicates that no Welsh ecosystems contain all the necessary attributes of resilience, including those in our designated landscapes. A priority for designated landscapes is to act upon these findings and ensure the management and use of natural resources focuses on maintaining and enhancing the status of their attributes – the connectivity, condition, scale/ extent and diversity. Further action in designated landscapes to address biodiversity decline is therefore necessary to maintain and enhance ecosystem resilience.’

The English and Welsh National Parks are not bucking the national trends of decline.

3.3 Pressures within the Parks

The Parks face a number of pressures and challenges and these vary between the Parks. The New Forest and South Downs National Parks face far more pressure for development of new market housing within and around the edge of the Parks, for example, than Northumberland. As highlighted by table two, the South Downs and the Lake District received over 18 million visitors each in 2016, compared to Exmoor, which received less than 1.4 million. Encouraging and managing visitors to the Parks presents, therefore, different challenges and opportunities.

It is important that pressures and opportunities are identified and tackled at the local level and this report does not aim to set out an analysis of those different pressures.

Table 2 – Visitor numbers to the England and Welsh National Parks (data supplied STEAM data)

National Park	Visitor numbers (000s)			% change from 2014 to 2016
	2014	2015	2016	
Brecon Beacons	4,015	4,146	4,157	3.5
Broads	7,172	6,853	6,867	-4.3
Dartmoor	2,183	2,309	2,386	9.3
Exmoor	1,298	1,364	1,374	5.8
Lake District	16,383	17,320	18,411	12.4
New Forest	3,780	3,927	4,034	6.7
North York Moors	6,153	6,473	6,799	10.5
Northumberland	1,400	1,465	1,496	6.9
Peak District	8,448	8,633	8,637	2.2
Pembrokeshire Coast	1,930	2,012	2,037	5.5
Snowdonia	3,793	3,885	4,040	6.5
South Downs	18,594	18,846	18,846	1.4
Yorkshire Dales	3,718	3,615	4,587	23.4

The *State of Nature 2016* report notes that many factors have resulted in changes in the UK's wildlife over recent decades, but that agricultural change, driven by policy, was by far the most important driver of declines. Climate change is also recognised as having a significant impact, but these impacts have been both beneficial and detrimental. Both of these factors affect all of the English and Welsh National Parks.

Farmers and land managers should have an important role in enhancing the National Parks but the management of the land within the Parks has not always been exemplary. There have been significant changes in farming practices and society since the National Parks were created. Much of this has been driven over the last four decades by the Common Agricultural Policy. Farming has become more mechanised and often more intensive; the use of fertilisers and chemicals more widespread; summer haymaking has been replaced by earlier cuts for silage and haylage; farms have become larger and more specialised; hedgerows have been removed; and small farms have become uneconomic but ever more attractive assets for non-farming purchasers.

The table in annex one also highlights more recent changes in the type of livestock being farmed within the Parks. Data from between 2009 and 2016 shows that across all of the English National Parks the number of cattle reduced and in all but one of the Parks the number of sheep increased. These changes in grazing regimes and shift away from mixed farming has implications for nature and habitat management within the Parks. The average densities of sheep also varied substantially between the Parks – with the Broads having 0.25 sheep per farmed hectare, compared with Exmoor which has 4.71 and the Lake District which has 4.49.

Increases in the intensity of the management of moorlands have also been seen. A study led by the RSPB showed that between 2001 and 2011, the number of burns recorded on moorland increased by 11% each year⁴⁰.

Another challenge for wildlife in some of the National Parks, especially the upland Parks, is wildlife crime and declines in raptor populations. The RSPB's *Birdcrime* report⁴¹ summarises offences against wild bird legislation that are reported to the RSPB each year. In 2016, there were 81 confirmed raptor persecution incidents. 19 of those confirmed incidents were in North Yorkshire and while not all of those incident may have been within National Park boundaries, 42% of the county is covered by National Park designations⁴². The report highlights that the 2016 UK hen harrier survey showed a 27% decline in the last 12 years and that many persecution crimes go undetected and unreported so the incidents in the report are the 'tip of the iceberg'.

3.4 Nature conservation as a priority within the Parks

The *Environment Act 1995* requires Park Authorities to prepare and publish a National Park management plan, 'which formulates its policy for the management of the relevant Park and for the carrying out of its functions in relation to that Park' [section 66]. The documents, which are prepared in partnership with relevant local stakeholders and undergo public consultation, are an important articulation of priorities for each Park, informed by an understanding of the local pressures, challenges and opportunities.

The analysis in annex two demonstrates that the extent to which the challenges and opportunities in relation to wildlife are covered within the management plans varies across the Parks. Issues such as invasive species and habitat loss are identified in all of the Plans to some extent. Different approaches are, however, taken in terms of identifying targets and strategies with some plans identifying specific species, while others take a high level approach by talking about securing better wildlife in general terms.

Exmoor National Park management plan⁴³ highlights the issues facing particular species, stating: 'Some of Exmoor's moorland birds are not faring so well, such as curlew, merlin, kestrel and Dartford warbler, or are no longer found here at all: lapwing, ring ouzel and red grouse. Other species typically associated with lowland areas are increasing on Exmoor including linnet, reed bunting and yellow hammer'.

Yet in spite of this recognition for certain species, none of the four strategic goals to meet the ambition of being 'rich in wildlife' contain a specific objective for populations of any particular species. In contrast, the North York Moors National Park management plan⁴⁴ contains a target to see populations of merlin 'not decline'.

⁴⁰ The Ecologist (2015) *Britain's protected moorlands go up in flames*

⁴¹ RSPB (2017) *Birdcrime 2016*

⁴² Based on a combined area of the Yorkshire Dales and North York Moors National parks being 3,615sq km and the area of North Yorkshire being 8,654sq km

⁴³ Exmoor National Park Authority (2018) *Exmoor National Park: partnership plan 2018 - 2023*

⁴⁴ North York Moors National Park Authority (2012) *North York Moors National Park management plan: a wider view*

The South Downs National Park management plan⁴⁵ lists, pictorially, some of their priority species including grey partridge, skylark, otter, burnt orchid and European eel and follow this with a policy to 'conserve and enhance populations of priority species in and around the National Park, delivering targeted action where required'.

The Northumberland management plan⁴⁶ takes a more general approach by including enhancing and linking habitats as part of an objective, but not identifying any specific species. The plan sets out the intention of establishing 'an effective evidence base for the priority habitats and species that act as a barometer for the health of the uplands, and target specific projects to enhance them' [objective 2.2.1], so the Authority may include more specific targets in a future plan.

A number of management plans use case studies to helpfully illustrate how they will work to achieve improvements in relation to wildlife. In the Brecon Beacons plan⁴⁷, for example, the work of Mynydd Du graziers is highlighted and provides some insight into how the Brecon Beacons National Park Authority will engage with communities to deliver on their ambitions for wildlife.

Overall, however, our analysis found that the scale of the decline in wildlife is not well articulated in the plans and neither are the strategies for confronting these issues and reversing the decline. Additional documents, such as Local Biodiversity Action Plans, were more likely to contain a detailed vision for wildlife. In Dartmoor's management plan, for example, it states 'targeted action to protect and enhance Dartmoor's habitats and species is guided by Living Dartmoor'⁴⁸. Living Dartmoor was produced by the Dartmoor Biodiversity Partnership and aims to co-ordinate work to enable a network of health, diverse habitats to benefit wildlife, landscapes, people and natural resources. At National Park level, this valuable resource identifies Key Wildlife Areas and flagship species for different habitats within the Park. While Living Dartmoor is an excellent example of how partnerships can bring together important data, because management plans are such an important document for the Parks we believe more of the priority actions should have been included explicitly in the management plan.

The level of priority being given to enhancing nature in management plan's needs, therefore, to be much greater if ambitions for more functional and resilient ecosystems and more diverse and abundant wildlife are to be achieved in the Parks.

⁴⁵ South Downs National Park Authority (2013) *Partnership management plan: shaping the future of your South Downs National Park 2014-2019*

⁴⁶ Northumberland National Park Authority (2016) *Management Plan 2016 – 2021: distinctive places, open spaces*

⁴⁷ Brecon Beacons National Park Authority (2015) *A management plan for the Brecon Beacons National Park 2015 - 2020*

⁴⁸ Accessed 19 June 2016 - <http://www.yourdartmoor.org/the-plan/sustain/natural-network>

Chapter 4 - What is preventing us from making the ecosystems within the Parks healthier and more abundant with wildlife?

‘Escalating pressures, such as climate change and modern land management, mean that that we continue to lose the precious wildlife that enriches our lives and is essential to the health and well-being of those who live in the UK.’

Sir David Attenborough, foreword to *State of Nature 2016*

There is not a simple, one size fits all, solution to making the Parks richer in wildlife. The Parks have to integrate a range of interests and priorities if they are to fulfil their purposes and thrive. This should not prevent change and improvement, but it is important context within which to consider any barriers that exist to achieving our aim.

To inform this report we talked to a wide range of stakeholders with an interest in the Parks. This included exploring what, if any, barriers currently prevent action to improve wildlife within the Parks. This section sets out the main themes and issues raised.

4.1 Land ownership and policy levers

The National Parks are predominantly privately owned. Unlike the National Parks in the United States of America that are owned by the state, in designating the National Parks for the nation the UK government did not acquire the land. 95% of the land within the Yorkshire Dales National Park⁴⁹ and 80% of the North York Moors for example, is privately owned⁵⁰. While the National Park Authorities are therefore responsible for seeking to achieve the purposes of the Parks, and have powers as local planning authorities, they do not have the power to mandate change in relation to land management. Relatively unusually, the Brecon Beacons National Park Authority owns almost 15% of its Park, in Pembrokeshire Coast the Park Authority owns only 1%⁵¹.

There are, however, some organisations that own substantial amounts of land within the National Parks. The National Trust, for example, owns around a fifth of the land within the Lake District National Park⁵² and cares for around 15,000 hectares in, or a tenth of, the Peak District⁵³. A large portion of the National Trust’s land is, however, leased to tenants, particularly tenant farmers, rather than directly managed by the Trust.

Northumberland National Park contains Otterburn Training Area, which is one of the UK’s strategic military training areas providing military training facilities for most in-service weapon systems,

⁴⁹ Yorkshire Dales National Park Authority (March 2018) *Draft Yorkshire Dales National Park Management Plan*

⁵⁰ Accessed 05 June 2018 - <http://www.northyorkmoors.org.uk/about-us/press-office/facts-and-figures>

⁵¹ National Parks UK (Feb 2015) *National Parks in Wales*

⁵² Lake District National Park Partnership (2015) *The Partnership’s Plan: the management plan for the English Lake District 2015 - 2020*

⁵³ Accessed 23 May 2018 - <https://www.nationaltrust.org.uk/lists/derbyshire>

including aircraft. The training area extends to 23,500 hectares, forming almost 23% of the National Park designated area⁵⁴.

Natural Resources Wales is also a relatively substantial land owner in two of the Welsh Parks, owning 17.5% of Snowdonia and almost 13% of the Brecon Beacons National Parks.⁵⁵

Working in partnership with land owners and managers to deliver improvements is essential. This is relevant in terms of the policy levers available to decision makers, at both local and national levels, to enable change.

Much of the land within the Parks is farmed or grazed. Funding from agri-environment schemes has been instrumental in delivering many improvements in habitat restoration and increases in species within the Parks over the last few decades, including the restoration of blanket bog in the Peak District and the re-creation of wildflower meadows in the Yorkshire Dales. As set out in section three, however, challenges still remain.

Our exit from the European Union and discussions about what will replace the Common Agricultural Policy, and how much funding will be available in the long term, presents challenges for achieving change in the short term due to the uncertainty it presents. In the medium to long term, however, it could present significant opportunities.

If future funding can be secured, a new programme of support could underpin and enable the delivery of a wide range of public benefits within the Parks. Professor Ian Bateman states in the Woodland Trust's *Putting down new roots* pamphlet⁵⁶, 'under the EU Common Agricultural Policy, any farmer deciding to plant trees on agricultural land faces a drop in their income'. There is a clear desire from many organisations, including the Woodland Trust, to see more native woodland within the National Parks. Our policy position statement on the future management of the uplands also advocates the need for a significant expansion in woodland of the right type and in the right places within the upland National Parks, recognising that woodland and trees are a key part of a multi-functional landscape. Some of the existing barriers could potentially be addressed in a new sustainable land management policy.

Another challenge in relation to land ownership and policy levers is in relation to the scale at which issues are and can be tackled. An example of this is invasive species, where National Park Authorities already undertake substantial amounts of work. Their actions alone, however, will not eradicate these species if there is not coordination and action with areas outside Park boundaries.

Coordinated partnerships, potentially at local, national or even international levels, with a diversity of stakeholders may be the only way to implement some necessary solutions.

In the case of illegal activity within the Parks, the existing legislative framework is seen as a barrier to tackling wildlife crime. In 2012 and 2013, for example, two illegal mass raptor poisonings took place on an estate within the Brecon Beacons National Park. Poisoned baits were discovered in October 2012 and 15 poisoned raptors and more poisoned bait were then found in October 2013.

Investigators found two poisoned ravens, five poisoned red kites and eight poisoned buzzards. The Dyfed Powys Police investigated and issued a statement that two people were arrested and a file of

⁵⁴ Northumberland National Park Authority (2016) *Management Plan 2016 – 2021: distinctive places; open spaces*

⁵⁵ National Parks UK (Feb 2015) *National Parks in Wales*

⁵⁶ Woodland Trust (2017) *Putting down new roots: essays on woods, trees and the landscape of the future*

evidence submitted to the Crown Prosecution Service. The Crown Prosecution Service advised, however, there was insufficient evidence to proceed with a prosecution⁵⁷.

4.2 Recognising and understanding the problem

A strong theme that came out of our discussions is a view that there is not universal agreement that there is a problem with nature conservation within the Parks. This was in relation to the diversity and abundance of species and the condition, including functionality, of habitats.

As noted in section 3.2, the condition of SSSIs within the Parks is below the national averages, and the Parks are not bucking the national trends of decline. In light of the protections and resources the Parks receive, and their national recognition, they should be exemplars of best practice and it is felt by many this is not the case. On the other hand, some argue that the Parks are well-loved, used and valued, and that demonstrates that maintaining the status quo is sufficient.

Getting people to understand the extent to which our natural environment has been degraded is a challenge within and beyond the National Parks. Shifting baseline syndrome is a concept that dates back to the mid 1990s whereby over time, knowledge is lost about the state of the natural world because people do not perceive changes that are actually taking place. This can happen between generations, so that each generation defines what is 'natural' or 'normal' according to current conditions and their personal experiences. With each new generation, the expectations of various ecological conditions shifts. Individual's baselines can also shift, so their personal understanding of what is normal changes within their lifetime.⁵⁸

The availability of data to understand trends and changes is essential. In our discussions it was argued that there was a need to better understand what is contained within the Parks, both in terms of wildlife and natural 'assets' more widely, before decisions could be taken about priorities for improvements. Data needs to inform an understanding of the current situation, but also what could be achieved through enhancement.

A number of Parks have developed State of the Park reports to underpin the development of various plans, including management plans and local plans. They do not, however, necessarily pull together high quality data on wildlife. The State of the Park report for Snowdonia, for example, includes maps of areas designated for wildlife under European and domestic legislation in the section on nature conservation. It does not, however, contain any information about the condition of the sites, or habitats and species more widely⁵⁹.

Projects involving volunteers through citizen science are increasingly popular and these may be a means of providing local data in the future and engaging the public. The Moors for the Future partnership, for example, has a citizen science project that inspires residents and visitors to engage with the moorlands by providing opportunities, training and materials to enable widespread

⁵⁷ Accessed 23 May 2018 - <https://raptorpersecutionscotland.wordpress.com/2016/07/02/statement-from-glanusk-estate-about-mass-poisoning-of-raptors/>

⁵⁸ See for example <http://remotefootprints.org/take-action/issues> and <https://news.mongabay.com/2009/06/proving-the-shifting-baselines-theory-how-humans-consistently-misperceive-nature/>

⁵⁹ Snowdonia National Park Authority (2015) *State of the Park report*

ecological and environmental monitoring to take place. This helps both the volunteers and the partnership collect evidence about the impact of climate change on upland habitats⁶⁰.

Some of the Parks, working with local partners, have commissioned studies to assess wildlife, ecosystem services⁶¹ or natural capital within their boundaries. Dartmoor National Park, for example, has worked with local partners to develop a detailed understanding of the key wildlife sites and species within the Park⁶².

4.3 Resistance to change

Nervousness and resistance to change was also a theme that came up regularly. This can be due to people's perception of the impact of change on landscapes and places that they value highly. It was noted that concerns were sometimes raised about the potential landscape implications, including the impact on landscape character, of for example more trees within the Parks. Research by the University of Cumbria, however, suggests that our landscapes could be considered even more beautiful with more trees within them. Researchers digitally altered photographs of the Borrowdale valley, adding and subtracting trees, as part of research about people's perception of tree cover within the Lake District National Park. 80% of respondents thought the valley had fewer trees than it actually does and 69% of participants favoured the images with more trees than currently within the valley⁶³.

Through our discussions it was also recognised that resistance to change can be due to the process of change. Significant change, such as river restoration, can cause disruption and damage in the short term in order to secure improvements in the long term. Disruption can result in tensions among people with different interests. For example, some wildlife focused schemes result in fencing being erected to prevent grazing and may need diversions to access routes, while some projects looking to restore red squirrel populations involve controlling populations of grey squirrels. This can result in passionate opposition and needs to be considered carefully.

The importance of engagement and outreach within local communities is now increasingly recognised for its role in potentially overcoming opposition. An increased awareness of the benefits of more natural management approaches, such as natural flood management systems for example, has reduced some, but not all, tensions. As well as supporting the collection of new data, the current popularity of citizen science can also be a valuable way of engaging people in conservation projects so they understand the need for, and benefits of, the project.

Concerns about improving wildlife can also be raised due to their potential impact on the cultural heritage of the area. This is frequently raised in relation to people discussing whether areas could be made to feel 'wilder', The fear of the loss of traditional farming systems, such as hefted flocks, or management techniques such as burning regimes, for example, is often raised as a concern in response to arguments for reducing stocking densities. The cultural heritage of the Parks is critically

⁶⁰ See <http://www.moorsforthefuture.org.uk/community-science> for more information (accessed 13 June 2018)

⁶¹ See for example

http://www.yorkshiredalesmanagementplan.org.uk/_data/assets/pdf_file/0011/986249/Executive-Summary-Ecosystem-Services-Provision-in-the-YDNP.pdf and <https://www.southdowns.gov.uk/wp-content/uploads/2016/12/EcoServ-GIS-Mapping-Tool-Evidence-Report-Draft.pdf>

⁶² Accessed 24 May 2018 - <http://www.dartmoor.gov.uk/wildlife-and-heritage/wildlife/living-dartmoor-strategy/living-dartmoor-national-park-level>

⁶³ <https://www.hortweek.com/increased-tree-cover-desirable-lake-district-survey-shows/arboriculture/article/1299877>

important but, just as landscapes evolve, so too does our cultural heritage. As management practices and approaches change over time, how we think about the local cultural heritage within the Parks, including historic approaches to land management, may also need to change over time. The economics of farming and current and future support payments will also be very influential to the future of the Parks.

4.4 The importance of language

Terminology was also raised repeatedly through our discussions as a potential barrier to change. Most notably, language around rewilding has raised concerns and sparked opposition to change in some Parks. A number of people we talked to as part of this research recognised that this has, at times, made communication and discussions with local people, and especially land owners and managers, more difficult.

There is a lack of consistency in terms of what people understand by the word rewilding and this is part of the challenge. Rewilding is understood by some to essentially mean land abandonment, while others describe rewilding as a spectrum in terms of scale and between passive and active management. While some argue for the reintroduction of top predators, for many rewilding refers to a less intensive management regime. Both Wild Ennerdale in the Lake District and the Knepp Estate in West Sussex are generally cited as examples of rewilding in England. Both are grazed extensively. The Knepp Estate website states: ‘without grazing animals, the scrub emerging from our post-agricultural fields would soon turn into closed-canopy woodland, which is a poor habitat for most wildlife’⁶⁴.

Wild Ennerdale [see box two below] also recognises the importance of extensive cattle grazing, stating ‘we introduced them as a natural disturbance process, as they are heavy enough to be able to disturb the ground vegetation creating a patchwork of natural seedbeds. Through a series of opportunistic processes seed falling on these patches may germinate and grow leading to more diverse habitats’⁶⁵.

We recognise that the Parks have been shaped by land management going back hundreds of years and they are not wild. We believe, however, an important role of the Parks is that they enable people to experience areas of the country that face less intrusion from the built environment and are more tranquil. As highlighted in the findings of our survey back in 2016 [see section 1.1], there is also a desire expressed by some that the Parks enable people to have a relatively wilder experience than other parts of the countryside. Landscapes that contain more resilient ecosystems, that are more functional in terms of ecological processes, are also important in terms of water filtration, flood alleviation and carbon sequestration.

Using language that engages people, not least land owners and managers, with a future vision for the National Parks will be an essential part of achieving improvements. One potential option, which also recognises the challenge presented by shifting baseline syndrome, is to seek to help people understand what has been lost and needs to be replaced. As noted in Snowdonia’s State of the Park report, large areas of Snowdonia would once have been afforested with native broadleaf forests, but human actions have reduced this over time. Supporting more woodland cover within the National Park, therefore, could be part of a healthier, more functional ecosystem within the Park without it being seen as a radical, inappropriate change to the character of the area.

⁶⁴ Accessed 15 May 2018 - <https://knepp.co.uk/the-drivers/>

⁶⁵ Accessed 15 May 2018 - <http://www.wildennerdale.co.uk/wildlife/cattle/>

4.5 Traditional approaches to conservation

Another theme raised through this work was the potential for the Parks to be used as test beds for innovation and exemplars of truly sustainable land management. For this to be possible at scale, it is likely that it would need to be supported through future funding schemes once we leave the European Union and the Common Agricultural Policy.

Box 2 - Wild Ennerdale

Wild Ennerdale is a partnership, which was established in 2002 and led by the National Trust, the Forestry Commission and United Utilities, as the primary land owners in the Ennerdale valley, and Natural England. Ennerdale is a remote valley on the western fringe of the Lake District National Park. It is 9 miles long and extends to an area of 4,711ha.

The area is significant for its rich legacy of archaeological remains and it is also home to diverse habitats for flora and fauna, which range from regional to international importance. Over 40% of the area is designated as SSSI and Special Area of Conservation. The continuous transition of vegetation types, from lakeshore through woodlands and open heath land, to the mountain tops, is spectacular.

Wild Ennerdale is one of the UK's largest wild land projects allowing ecosystems throughout the valley to evolve with greater freedom. The vision of the partnership is 'to allow the evolution of Ennerdale as a wild valley for the benefit of people, relying more on natural processes to shape its landscape and ecology'.

As the valley develops, it is hoped that there will be a series of naturally evolving and interacting ecosystems across the area that are far more robust in the face of stresses such as climate change. Farming and forestry will maximise ecology and landscape value. It cannot be predicted exactly how biodiversity may develop as natural processes are given greater freedom. The approach presents an opportunity to observe these processes at work and share these experiences.

The guiding principles for Wild Ennerdale are to:

- Give freedom to natural processes allowing robust, functioning ecosystems to develop on a landscape scale.
- Consider and respect the historical and cultural assets of the valley.
- Protect and enhance the sense of wildness
- Develop greater public enjoyment, engagement and social benefit.
- Establish sustainable business opportunities
- Monitor change on a large scale and over a long period of time.
- Share results and information as a demonstration to others.
- Only intervene where complementary to the vision or where a threat to the vision is posed.
- Focus management and decision making more at the landscape scale.

As set out in section 2.2, the Lawton report argued that a step-change in approach to nature conservation was needed, meaning a move towards one of large-scale habitat restoration and recreation, under-pinned by the re-establishment of ecological processes and ecosystem services. This has not, however, generally been achieved.

An e-book produced about Wild Ennerdale sets out a vision of the landscapes becoming a living laboratory where 'nature is unpredictable and in charge' and the valley is 'richer, more varied, colourful, thriving and more resilient to climate change and other threats'⁶⁶. The vision refers to allowing evolution and 'relying on more natural processes' to shape the landscape and ecology. We believe that most people would like to see National Parks that are richer, more varied, colourful, thriving and more resilient. To achieve this there is a need to identify land owners and managers that are prepared to take more innovative approaches, but it will also require decision makers and nature conservationists to move away from traditional approaches and accept some uncertainty. This should be possible within the Parks.

4.6 What does success look like?

If we are to secure a shift in priorities at both the local and national level we will need to consider what environmental outcomes are monitored within the Parks. A framework for monitoring 'environmental outcomes' in English protected landscapes was established in 2011⁶⁷. The framework uses the best available set of existing national statistics, combined with local measures, to monitor progress against a range of environmental outcomes. The national statistics used include: environmental stewardship uptake and spend; the proportion of heritage 'at risk'; the condition of SSSIs; the ecological status of water; the area of woodland in active management and percentage of rights of way that are 'easy to use'.

This national suite of 'outcomes' is then supplemented by local targets set out in some of the management plans. These national indicators are, however, insufficient. The 'spend' on agri-environment schemes, for example, does not give an understanding of whether or not the desired environmental outcomes are being or have been achieved.

While the monitoring of SSSIs is important, it was suggested through our discussions that we need to move away from using the condition of SSSIs as a proxy for measuring the state of wildlife and the health of ecosystems. If we believe there is a need to place more emphasis on embedding the Lawton Principles of bigger, better, more joined up, including prioritising improving the resilience of our ecological networks, we need to consider progress against this ambition. Thought needs to be given to monitoring connectivity, and in particular the extent and condition of priority habitats, as a proxy for resilience, rather than focusing solely on individual sites.

⁶⁶ Accessed 15 May 2018 - <http://www.wildennerdale.co.uk/spiritofplace/>

⁶⁷ Natural England (2011) *Framework for monitoring environment outcomes in protected landscapes*

Chapter 5 - Opportunities for improvement

'If we don't realize what we are losing we stand the risk of sleepwalking through the destruction of the natural world without taking action to remedy the situation.'

Prof EJ Milner-Gulland in an interview about shifting baseline theory (2009)⁶⁸

Funding will always be important in terms of incentivising, promoting and enabling change. The future of financial support for land owners and managers is being considered and we want to make sure that as well as rewarding the delivery of public goods, future schemes are sufficiently locally tailored to meet the needs of, and deliver the priorities within, the individual Parks.

Both the Westminster and Welsh Governments have currently committed to paying direct payments in 2019 as usual and a transition period will begin in 2020⁶⁹. While the exact length of transition periods have not been confirmed, the aim of implementing a new scheme by 2025 has been suggested. Within the transition phases there may be scope to pilot new schemes, and improve existing schemes, but this section focuses on considering what other opportunities and solutions could be implemented in the shorter term to secure more wildlife within the Parks.

5.1 Advice and leading by example

Peer to peer advocates have an important role in securing changes by farmers and land managers on the ground. While funding is critical and local advisers are helpful, farmers who have changed the way they manage their land and can demonstrate the benefits to the environment and their businesses, will be instrumental in encouraging and securing new ways of thinking. We know of a number of farmers in the Yorkshire Dales, for example, who have made some progress in communicating the economic and environmental benefits of reducing sheep numbers on holdings and introducing native cattle. They can draw on their own experience to support the argument that enhancing the wildlife and quality of the habitats found on the farm holding can be achieved while also increasing profit margins.

The creation of the Nature Friendly Farming Network⁷⁰, which contains a number of farmers from within the National Parks, helps to bring these advocates together to share best practice within its community. Within a number of National Parks there are systems of farm clusters, which enable peer to peer learning as well as facilitate landscape scale approaches. The Arun to Adur Farmer's Group⁷¹ within the South Downs National Park, is a voluntary initiative covering over 9,000 hectares of the chalk downs between the two rivers and including the river valley floodplains. The group's collective work delivers co-ordinated conservation benefits on a landscape scale. The aim of the group is to provide access to training events and meetings and enable the sharing of knowledge. A

⁶⁸ Accessed 12 June 2018 - <https://news.mongabay.com/2009/06/proving-the-shifting-baselines-theory-how-humans-consistently-misperceive-nature/>

⁶⁹ Statement by Lesley Griffiths on 7 May 2018 - <https://gov.wales/newsroom/environmentandcountryside/2018/180508-lesley-griffiths-sets-out-timetable-for-basic-payment-scheme-post-brexid/?lang=en> and Defra (2018) *Health and harmony: the future for food, farming and the environment in a Green Brexit*

⁷⁰ Accessed 13 June 2018 - <https://www.nffn.org.uk/>

⁷¹ Accessed 15 May 2018 - <https://www.southdowns.gov.uk/national-park-authority/our-work/farm-clusters/arun-to-adur-farmers-group/>

key objective for the group is improving soil health, which would have benefits for individual farm viability but would also improve the quality of drinking water and build soil carbon within organic matter. The group has also selected a number of high priority wildlife species for targeted conservation. These are water vole, the Duke of Burgundy butterfly, uncommon and rare arable flowers such as cornflower, and declining species of farmland bird such as grey partridge and lapwing.

The crucial challenge for farm clusters and similar models will be that the emphasis needs to be on enhancement, rather than the proliferation of the status quo.

5.2 Ambitious partnerships

We recognise that change on the ground at the local level will only be delivered through **working in partnership** and **engaging stakeholders and the public**. As highlighted in section four, many of the challenges and barriers identified are related to nervousness and subsequent opposition to change. This can be challenging in well-known and well-loved areas such as the National Parks but landscapes do, and will continue to, evolve.

To prevent resistance to change there is a need for the benefits of the proposed change to be communicated. From our discussions it was suggested that we need to remind people about what is missing from the Parks and what healthier landscapes that thrive with wildlife could look like. One way of achieving that could be through demonstration sites, which show people where wildlife is flourishing and what changes to management are trying to achieve. This is particularly important if the short term impact of changes in land management may be seen as negative. Language and terminology will also be important. It was suggested, for example, that we should be talking about 'putting trees back into the landscapes', rather than simply talking about planting more trees.

While human activity has played a crucial role in shaping our National Parks it is essential that cultural heritage is not used as an excuse to continue support for unsustainable land management systems. We want our rural communities to be thriving, but just as landscapes evolve, land management techniques have also evolved over time. Public money delivered through environmental land management systems will be key to supporting a shift to regimes that acknowledge the cultural heritage of the Parks, but also enable wildlife to thrive and, potentially, areas to feel relatively wilder. This shift will need to be implemented sensitively and strategically to maximise the public benefits from the area, support rural communities and deliver all elements of the two National Park purposes.

As recognised in section 4.1, the success of increasing wildlife within the Parks is, in part, reliant on the environment outside the National Park boundaries. In analysing the content of National Park management plans, we found strikingly few of the plans consider partnerships or community engagement beyond the boundaries of the National Parks with regards to wildlife. National Park Authorities need to develop partnerships beyond their boundaries. The New Forest National Park Authority has looked beyond its boundaries in aiming to build a partnership across the public, private and third sectors, to maintain and enhance natural capital through the Green Halo Partnership. A similar approach to working across boundaries may be required for improving wildlife, including tackling issues such as non-native invasive species, nutrient pollution and habitat connectivity.

5.3 Local and national leadership

While we recognise the critical importance of working in partnership to achieve improvements, it should not be used as an excuse for in-action. **National Park Authorities must demonstrate ambition and leadership on the issue of seeking to enhance the beauty National Parks.** This needs to include acknowledging failures in practice, for example where there are inadequacies in National Park management plans, and being more vocal about issues. We have seen progress with this in some areas, for example in recent months both the chief executive and the chairman of the Yorkshire Dales National Park Authority have made a number of statements on raptor persecution. If the challenge of wildlife decline is to be tackled we believe ambition and leadership needs to be shown by all National Park Authorities, including their members and senior management teams.

National Park management plans should be a key lever for change at the local level. While we recognise that management plans are developed in partnership with local stakeholders, there is a need for the plans to be braver in terms of promoting and driving more innovation within the Parks.

If we are to achieve a step change in the functionality and resilience of ecosystems and the abundance of wildlife within the Parks, management plans need to include policies and indicators that seek to deliver this. This should include policies and strategies for a more ambitious, joined up approach to improving both the diversity and abundance of wildlife. Plans should also indicate areas where less intensive land management might be desirable to enable people to experience areas that are relatively wilder, identify habitats that need to be expanded or made healthier, and be clear where changes are required.

Due to the quantity of the priorities in management plans, it can be hard to understand what the proposed objectives will all mean in practice in terms of how areas of the Park may need to evolve in order to achieve the vision. **Plans would benefit, therefore, from the inclusion of a spatial representation of the objectives.** While we recognise lines on a map may not be desirable, a spatial indication of areas within the Park where the ambition for specific habitat creation or expansion, for example, might be a priority, or where an ambition for more visitors might be best realised and managed. Areas within the Park that feel more wild and remote, and are managed as such, should also be identified.

While we acknowledge that multiple objectives will be relevant in many areas, and representing them spatially might be challenging to achieve, we believe such a representation of the priorities would help engage the public in the plan and the vision for the Park. It could also help the management plan steer the delivery of future agri-environment schemes and help articulate where improvements in ecosystem services or natural capital should be achieved.

Policies should be underpinned by monitoring that will assess progress against them.

We recognise that National Park Authorities cannot achieve all of the changes we believe are necessary. There is a **need for national leadership too.**

Birds of prey are not thriving in the English and Welsh National Parks and while there is a need for vocal, local leadership on this issue the persistence in raptor persecutions is also a result of an ineffective legal framework. This can be seen in the small number of successful prosecutions for raptor persecution. In 2016, for example, there were no bird of prey persecution related prosecutions across the whole UK⁷².

⁷² RSPB (2017) *Birdcrime 2016*

Different campaigners have argued for different solutions to tackle raptor persecution, including the acceptance of wider forms of evidence in courts, tighter licensing agreements for grouse moors, or even outright bans on some forms of grouse shooting. In 2011 the *Wildlife and Natural Environment (Scotland) Act* introduced vicarious liability offences in Scotland. The English and Welsh Government's need to take action and provide better mechanisms for tackling wildlife crime.

Both the Westminster and Welsh Government's also need to show leadership as we exit the European Union. It is essential that existing environmental protections are retained, if not strengthened, and that future sustainable land management policies incentive and support the delivery of a wide range of public benefits within the Parks.

5.4 Test beds for innovation and different approaches

Some National Park management plans recognise the need for National Parks to look at innovative ways of enhancing the environment. Management plans such as the Lake Districts' acknowledge the uncertainty facing the agricultural industry given the UK's withdrawal from the EU, and it is known that other National Parks are positioning themselves as areas within which new sustainable land management policies could be tested⁷³.

If we want to improve the wildlife and the quality of the ecosystems within the Parks, we need to consider how to **improve connectivity within and between the Parks** and other designated areas, such as SSSIs. This will be critically importance if we are to manage and mitigate the impacts of climate change. At the national level there is a need for leadership on developing a more joined up network of habitats, in line with the Lawton Report's vision. This should draw on the Nature Recovery Network proposed in the 25 Year Environment Plan, which should include the National Parks at its heart, but it will also need to consider habitats across England's borders.

We also believe the Parks are well placed to **test a more fundamental change in approach to nature conservation**. The Lawton report argued there was a need to move from the current approach of 'trying to hang on to what we have, to one of large-scale habitat restoration and recreation, underpinned by the re-establishment of ecological processes and ecosystem services, for the benefits of both people and wildlife' [page ii]. We have noted already that making the Parks relatively wilder and more biodiverse may not be one and the same thing, but that is partly because of the uncertainty presented by an approach that focuses on less intervention. The Parks are vast tracts of land and there should be scope to work with landowners and managers, and local staff from Natural England and Natural Resources Wales, to test approaches where the emphasis is on re-establishing ecological processes. This will need to be underpinned by financial support for land managers and monitoring to understand the impacts of the health of habitats and diversity and abundance of species.

Consideration should also be given by the National Park Authorities to opportunities for the **translocation of appropriate wildlife**. If we can achieve healthier, more resilient ecosystems within the Parks they then have the potential to be priority sites for appropriate introductions.

We acknowledge there is at times nervousness about the reintroduction of species that have in the recent past been missing from ecosystems. National Park Authorities should, therefore, draw on their expertise in other areas to support a bolder approach on this issue. For example, most Authorities use their expertise in tourism management to implement some form of wildlife eco-

⁷³ See for example *Exmoor's Ambition* - http://www.exmoor-nationalpark.gov.uk/data/assets/pdf_file/0010/1112869/ExmoorsAmbition_Web.pdf

tourism within their Parks. In Wales, feeding stations attract visitors eager to see red kites in the Brecon Beacons. The Planed Natural Capital Audit estimated that red kite tourism contributed £3m to the mid Wales economy⁷⁴. While the Pembrokeshire Coast offers a number of wildlife watching tours and facilities, peregrine falcons can be seen at Malham in the Yorkshire Dales and bird watching tours are a constant feature of the Broads.

Such schemes have the potential to deliver multiple benefits, including economic and social benefits to local communities. This in turn raises public support for the wildlife and further incentivises action to sustain, promote and protect populations of the specific species. Ecotourism is only part of the answer, however, and often brings with it other issues of sustainability. Such opportunities need, therefore, to be developed within a wider, strategic approach such as the management plan.

⁷⁴ Natural Capital Audit by Planed, accessed 5 June 2018 - https://wwbic.org.uk/wp-content/uploads/2014/04/natural_capital_audit_volume_1.pdf

Chapter 6 - Conclusions and recommendations

'Our consideration of all these pressures and demands leads us to conclude that the purposes of the National Parks cannot sensibly be pursued in equal measure throughout the whole of the Parks; and that management policies should have different objectives in different parts of the Parks, according to the varying qualities and circumstances.'

Sandford report, 1974 [page 11]

The National Parks are important for wildlife and offer opportunities for people to 'get away from it all'. The Parks are beautiful but the habitats and natural processes within them are not as healthy and functional as they should be and, in places, wildlife is not thriving. National trends show declines in wildlife and the Parks are not currently bucking those trends.

As vast tracts of land the Parks offer opportunities for more innovative, landscape scale approaches to nature conservation and land management. Working in partnership, including with land owners and managers, will be crucial to achieving change. There is also, however, a critical need for local and national leadership. Local and national policies and strategies have to be ambitious about the future of the National Parks and the opportunities they present for healthier, more functional ecosystems, wildlife and opportunities to escape in relatively wilder areas of the countryside.

Our exit from the European Union and proposed new sustainable land management policies present opportunities to incentivise and support a new way of managing the land within the National Parks. This report highlights that there are, however, additional challenges and opportunities in terms of achieving that change. We do not underestimate the importance of discussions about the future direction of the policies that will replace the Common Agricultural Policy, but this report sets out the importance of other policies and levers in achieving change. Some of these are local, such as management plans, which could help make changes in the short term. Others, such as a need for a radical change in how nature conservation is approached, need to be piloted now or they risk preventing meaningful change in the long term.

The National Parks provide many public benefits, but there is still scope for improvement. To improve the health and resilience of the habitats and diversity and abundance of wildlife within the Parks, Campaign for National Parks believes a number of changes at the national and local levels need to be made.

6.1 Recommendations

We will campaign, in partnership with relevant organisations including the National Park societies, to secure the following **locally focused recommendations**:

- i. **National Park Authorities should demonstrate more leadership and ambition on raising the bar on enhancing nature within their Park.** One means of doing this will be through management plans, which should include specific goals and targets for habitat improvement and/or creation and species population recovery. Plans should also include a spatial representation that sets out which policies are a priority for different areas of the Parks. This should include opportunities for expanding and linking up fragmented habitats, supporting

natural processes to flourish and enhancing natural capital and, where relevant, the removal of invasive or inappropriately located species.

Opportunities to support reintroduction programmes should also be identified and where illegal persecution of raptors is an issue, this should be included as a clear priority for action.

Where significant changes in the extent of habitats, or abundance and/or diversity of species are identified proposals should be modelled to help articulate the positive impact of these changes. Such an approach should seek to address any concerns about proposed changes, for example concerns about increases in woodlands and trees having a negative impact on landscape character.

The implementation of this vision and policies should be underpinned with financial support from a future, locally tailored environmental land management policy.

- ii. **National Park Authorities should identify an area, or areas, within which they will implement policies to make the areas feel relatively wilder.** This will include working with landowners and managers, so land is managed less intensively and natural processes support more robust, functional ecosystems. Links should also be made to local plan policies so intrusion from light and noise pollution can be minimised. Wildlife should be monitored within these areas and a 'control' area established outside of the area to understand the impact of the change in management.

The extent to which the area(s) will feel 'wild' will vary from Park to Park but within each Park, all of which are vast tracts of land, areas that are managed more extensively should be identified. This should be supported by funding through future environmental land management policy.

We will campaign to secure the following **nationally focused recommendations**:

- iii. **Natural England and Natural Resources Wales should work with the National Parks to trial a new approach to conservation** that focuses on the re-establishment of natural ecosystems and enhancing natural capital. The outcomes for wildlife and people should be monitored closely to inform future approaches to nature conservation.
- iv. **Future payments for farmers and land managers should be locally tailored and environmentally focused.** Future sustainable land management policies should protect and enhance natural capital, thereby recognising the role farmers and land managers have in delivering clean air and water, reducing flood risk, carbon sequestration, biodiversity and public access, integral to maintaining these beautiful, cultural landscapes that are valued by much of the public.
- v. To ensure that the many sensitive and important areas for nature in National Parks can be safeguarded, **it is essential that protections for nature are maintained after the UK leaves the European Union.**
- vi. To better protect birds of prey, and wildlife more widely, and restore the ecological integrity and vitality of our blanket peatlands and upland dwarf shrub heaths, **the Westminster and Welsh Governments should introduce a system of licensing of driven grouse shooting.** This should also be accompanied by the use of vicarious liability to uphold accountability within any new regulatory system.

- vii. **A new suite of environmental outcomes should be developed for England and Welsh National Parks** to better prioritise the need for habitats to be bigger and better connected and ecological networks to be more resilient. Progress against the suite of outcomes should be monitored on an annual basis and be made publicly available.

Annex 1 – Overview of cattle and sheep numbers in the English National Parks⁷⁵

	Total farmed area (ha)		% change	Cattle (no of animals)		% change	Sheep (no of animals)		% change	Sheep stocking density (no of sheep per farmed ha)	
	2009	2016		2009	2016		2009	2016		2009	2016
	Broads	19,260	18,157	-6	11,965	10,761	-10	3,904	4,595	18	0.20
Dartmoor	49,453	63,332	28	46,416	41,568	-10	177,919	189,617	7	3.60	2.99
Exmoor	53,021	55,083	4	26,689	25,007	-6	258,231	259,711	1	4.87	4.71
Lake District	126,848	152,777	20	68,446	60,303	-12	658,896	686,423	4	5.19	4.49
New Forest	14,626	17,845	22	11,029	9,701	-12	4,964	6,437	30	0.34	0.36
North York Moors	77,687	92,561	19	60,023	54,009	-10	126,493	140,171	11	1.63	1.51
Northumberland	66,419	77,063	16	15,256	12,569	-18	214,506	238,005	11	3.23	3.09
Peak District	113,996	114,378	0	93,131	91,768	-1	374,964	394,092	5	3.29	3.45
South Downs	113,287	115,594	2	46,099	39,006	-15	125,605	134,791	7	1.11	1.17
Yorkshire Dales	123,509	147,158	19	47,365	46,584	-2	614,595	599,401	-2	4.98	4.07

Please note this data is for commercial holdings only. Commercial holdings are those with significant levels of farming activity. Significant levels classified as any holding with more than 5ha of agricultural land, 1ha of orchards, 0.5ha of vegetables or 0.1ha of protected crops, or more than 10 cows, 50 pigs, 20 sheep, 20 goats or 1,000 poultry.

⁷⁵ Data compiled from: <https://www.gov.uk/government/statistical-data-sets/structure-of-the-agricultural-industry-in-england-and-the-uk-at-june>

Annex 2 – Review of National Park management plans

Analysis undertaken by Campaign for National Parks, May 2018

Brecon Beacons National Park Authority (2015) <i>A management plan for the Brecon Beacons National Park 2015 - 2020</i>	
Is the plan ambitious about improving wildlife?	Wildlife is consistently integrated across the vision for the Brecon Beacons, for example aim four specifically calls for the Park Authority to experiment with novel conservation approaches. However, in other parts of the plan ambition is lacking. Under point 94 'specific actions' to deliver the aims and objectives of nature conservation are set out. However, they are vague and could refer to any other authority area in the UK. The plan benefits from specific ambitions for woodland and climate change. Overall the plan would be enhanced by including spatially specific recommendations of their ambition for wildlife.
Does the plan adequately identify the issues facing wildlife?	The plan could give more detail about the issues facing wildlife in the Park. For example more site specific information describing the habitats of the Park is provided in point 84 than details are given on the threats in the following points. Where specific details are included it is welcome, for example the mention of the threat of the <i>Phytophthora ramorum</i> disease. The plan does a good job of using case studies and partnerships to illustrate the issues.
Does the plan demonstrate innovative thinking to restore wildlife?	There is a specific ambition for an experimental approach to conservation issues. This clear call for novel solutions is positive but we would like to see it backed with information on the types of approaches they are receptive to.
Broads Authority (2017) <i>Broads Plan 2017: partnership strategy for the Norfolk and Suffolk Broads</i>	
Is the plan ambitious about improving wildlife?	The ambitions for wildlife in the Broads are contained under theme two of the plan. Within this theme there is a good mix of scales (for example both catchment areas and priority species) with nods to the acute issue facing wildlife in the Broads. There is an interesting depiction of ecosystem services, this could be expanded to better include the ambitions for wildlife.
Does the plan adequately identify the issues facing wildlife?	The plan takes time to cover landscape/catchment scale issues and link these with ambitions and future/ongoing projects. More details on the specific threat of certain issues, for example invasive species, would be welcome. Similarly to many reports climate change is well represented in the plan, with a detailed and specific strategy.
Does the plan demonstrate innovative thinking to restore wildlife?	This plan could be improved by a clearer commitment to experimental and innovative conservation. However the plan recognises the unique characteristics of the Broads landscape and provides a distinctive perspective on conservation issues.
Dartmoor National Park Authority (2014) <i>Your Dartmoor: Dartmoor National Park management plan 2014 - 2019</i>	
Is the plan ambitious about improving wildlife?	There is a good ambition to both prevent the decline of Dartmoor species and to increase their abundance. The plan could convey this spatially to provide better detail on the ambitions of the National Park Authority
Does the plan adequately identify the issues facing wildlife?	The plan recognises a number of threats to the wildlife of Dartmoor, including more controversial and dynamic challenges such as the vitality of the agricultural industry. The plan simultaneously proposes a number of strategies for facing such complex threats, however further details and more specific goals should be produced to meet these challenges.
Does the plan demonstrate innovative thinking to restore wildlife?	The plan shows a lack of innovation with little mention of alternative or novel approaches to the issues. This plan could consider more radical ways of achieving their vision for wildlife in Dartmoor.

Exmoor National Park Authority (2018) <i>Exmoor National Park: partnership plan 2018 - 2023</i>	
Is the plan ambitious about improving wildlife?	This plan would benefit from more specific ambitious goals that are really focussed on the issues in Exmoor.
Does the plan adequately identify the issues facing wildlife?	There is an attempt to tackle the issues within the vision for Exmoor, for example by tackling pollution and achieving a carbon neutral Park. There is also recognition of the unstable political context facing land management in the Park and specific recognition of the threats facing some species, such as curlew, merlin and kestrel. Furthermore there are specific strategies for aspects of land management including farmland and moorland which enhances the detailed strategies within the plan.
Does the plan demonstrate innovative thinking to restore wildlife?	The plan reflects contextual uncertainties and this gives the plan flexibility in the delivery of its ambitions. However the plan lacks a strong emphasis on new and novel approaches to restoring biodiversity.
Lake District National Park Partnership (2015) <i>The Partnership's Plan: the management plan for the English Lake District 2015 - 2020</i>	
Is the plan ambitious about improving wildlife?	There are strong ambitions for wildlife in the Lake District partnership plan however this could go into further detail with more specific goals.
Does the plan adequately identify the issues facing wildlife?	Like many plans the Lake District partnership plans recognises some of the issues facing wildlife in the Park but then fails to match these with specific goals and strategies to address them.
Does the plan demonstrate innovative thinking to restore wildlife?	While there is a welcome call for open minded approaches to conservation and some innovative thinking, more details could be provided on current or future projects which make an effort to restore biodiversity.
Produced jointly by New Forest National Park Authority and partners (2015) <i>Partnership plan for the New Forest National Park</i>	
Is the plan ambitious about improving wildlife?	The plan contains good ambitions for retaining and improving wildlife including some specific goals. For example under strategy LH1 there is the ambition to improve conservation sites with the specific aim to enhance at least 30 local sites. In strategy LH2 there are similarly specific targets for the condition of SSSIs.
Does the plan adequately identify the issues facing wildlife?	It is noted in the introduction to the plan that actions have not been developed in great detail and this is reflected in the strategies for improving wildlife. More detail would enable the plan to better identify and tackle the issues facing biodiversity.
Does the plan demonstrate innovative thinking to restore wildlife?	Within this plan there is an openness towards new and innovative thinking however more detail is required to understand what new approaches might be taken forward in the New Forest.
North York Moors National Park Authority (2012; first review 2016) <i>North York Moors National Park management plan: a wider view</i>	
Is the plan ambitious about improving wildlife?	There are some good overall ambitions and some good specific targets within this plan. It includes detailed targets such as the aim for an additional 3,000 hectares of woodland, and there is the use of merlin populations as a key success indicator. These are welcome, however other ambitions lack substance.
Does the plan adequately identify the issues facing wildlife?	This management plan should be noted for containing an attempt to confront controversial issues facing wildlife in the North York Moors, for example recognising cases of illegal persecution. This plan identifies and seeks to address a number of detailed issues in an effort to improve wildlife in the Park.
Does the plan demonstrate innovative thinking to restore wildlife?	More could be done in this plan to demonstrate a willingness to engage with communities and partners in this plan. This would be a particularly useful way to add substance to strategies that look at the multifaceted issues facing wildlife in the North York Moors.

Northumberland National Park Authority (2016) <i>Northumberland National Park Management Plan 2016 – 2021: distinctive places, open spaces</i>	
Is the plan ambitious about improving wildlife?	Some of the objectives within the plan are lacking in ambition and detail. For example ambitions for the condition of SSSIs in the management plan could be improved to reflect more local information. The plan is stronger in its ambitions for mitigating climate change where there is a strong set of objectives.
Does the plan adequately identify the issues facing wildlife?	This plan would be improved by more details of the threats facing wildlife in Northumberland as well as detailed, specific strategies for achieving the ambitions. Attempts to confront issues are too vague or lacking entirely.
Does the plan demonstrate innovative thinking to restore wildlife?	This plan has a limited degree of openness towards new and innovative approaches to conservation. It would benefit from displaying an openness to new approaches in nature conservation and following this with information on the types of thinking they would be most receptive to.
Peak District National Park Authority (2018) <i>Peak District National Park Management Plan 2018 - 23</i>	
Is the plan ambitious about improving wildlife?	The Peak District National Park management plan contains a series of ambitions for retaining and boosting levels of wildlife in the Park, supported by a number of good goals. The National Park Authority could consider how they could provide greater details of their ambition for wildlife through, for example, a more spatial representation.
Does the plan adequately identify the issues facing wildlife?	The plan does well to contextualise challenges such as uncertainty in the agricultural industry, similarly the plan does not shy away from recognising some of the more controversial issues facing wildlife in the Peak District, for example the underrepresentation of birds of prey in the landscape. While the plan contains a number of strategies, these could be more specific and recognise more local objectives.
Does the plan demonstrate innovative thinking to restore wildlife?	The need for new thinking is highlighted multiple times in the management plan, for example in tackling climate change: '[traditional management of the Park] has tried to adapt to changes to keep the National Park relevant to society. We need to look to the future and decide what we must do differently in light of what we know about the potential effects of future climate changes. We cannot keep things the same. We need to build our evidence base to help make these decisions'. More details on this sort of future-focussed thinking would be welcome.
Pembrokeshire Coast National Park Authority (2015) <i>National Park management plan 2015-2019</i>	
Is the plan ambitious about improving wildlife?	This plan could set more ambitious and specific targets for wildlife in the Pembrokeshire Coast. Many of the ambitions present in the report lack detailed strategies.
Does the plan adequately identify the issues facing wildlife?	The plan could do more to adequately identify and address the issues facing wildlife in the National Parks. While it sets out the condition of some of the wildlife sites, the plan lacks analysis of why this is the case. It also lacks strategies, objectives or ambitions to properly meet these challenges.
Does the plan demonstrate innovative thinking to restore wildlife?	The plan shows some level of innovative thinking including contingency planning for the marine environment and a strong effort to link together cultural and ecological heritage. However there is a lack of detail about projects and ambitions to restore wildlife in the National Park.
Snowdonia National Park Authority (2010) <i>Snowdonia National Park management plan 2010-15</i>	
Is the plan ambitious about improving wildlife?	This plan prominently includes climate change resilience and includes specific ambitions for improving wildlife in the Parks. For example, there is the specific aim to conduct restoration of riparian river habitats, and ensure that land management is sympathetic to water quality. To improve, this plan should think about how they represent these wide ranging aims and how they can more locally tailor the targets.
Does the plan adequately identify the issues facing wildlife?	Responding to climate change features highly within the plan's vision. There is recognition for issues such as the threat of invasive species, soil degradation and the lack of habitat connectivity throughout the plan's many specific objectives. It

	is also pleasing to note that wildlife is also considered in objectives around sustainable tourism and enhancing landscape.
Does the plan demonstrate innovative thinking to restore wildlife?	The plan is ambitious but could more openly recognise the need for innovative thinking to reverse the decline of wildlife in Snowdonia.
South Downs National Park Authority (2013) <i>Partnership management plan: shaping the future of your South Downs National Park 2014-2019</i>	
Is the plan ambitious about improving wildlife?	This plan contains a number of ambitions for improving the abundance and diversity of wildlife within the South Downs. To take this further the National Park Authority should consider how they could represent more locally tailored ambitions.
Does the plan adequately identify the issues facing wildlife?	Detail is uneven in this plan, for example lots of consideration is given to climate change in the plan but not enough is given to other facing wildlife in the South Downs, for example 'new diseases and invasive species'. This plan also uses case studies such as the work of Butterfly Conservation or a partnership in the Ouse Valley to illustrate both the threats and what's being done to confront these issues.
Does the plan demonstrate innovative thinking to restore wildlife?	There is little thought given to innovative or novel approaches to wildlife conservation and the restoration of ecosystems in the plan. However there is space dedicated to 'future thinking' in the context of agriculture and land management.
Yorkshire Dales National Park Authority (revised 2016) <i>Yorkshire Dales National Park management plan 2013-18</i>	
Is the plan ambitious about improving wildlife?	The management plan has the strong opening ambition of being 'home to the finest variety of wildlife in England' this laudably high ambition is reinforced by a number of strong objectives such as achieving a good ecological condition for '60% of rivers' by 2022.
Does the plan adequately identify the issues facing wildlife?	There is an in-depth description of the habitats and condition of nature within the Yorkshire Dales. We note detailed work is being undertaken to inform a new management plan, which is expected to more explicitly confront more controversial issues than the current plan; we would welcome this development.
Does the plan demonstrate innovative thinking to restore wildlife?	This management plan has strong ambitions but needs to be clearer about being open to novel and new approaches – case studies could be a good way for the plan to illustrate experimental approaches already happening within the Parks.



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Campaign for National Parks
is the only national charity
dedicated to protecting and
promoting all 13 of the
National Parks in England
and Wales.

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