



Submitted by email to: localnaturerecoverystrategies@defra.gov.uk

Response to Consultation on Local Nature Recovery Strategies: how to prepare and what to include

1. The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.
2. We welcome the chance to respond to this consultation. Given our remit, we wanted to focus specifically on the way in which Local Nature Recovery Strategies (LNRS) will operate in National Parks. We have therefore chosen not to respond to the online questionnaire as many of the questions were not applicable for us but we do have a number of points that we believe should be addressed when developing the guidance and regulations and we have set those out here.
3. The English designated landscapes (10 National Parks and 34 Areas of Outstanding Natural Beauty (AONBs)) collectively cover nearly a quarter (24.5%) of England. These areas offer a significant opportunity to address nature recovery at scale and should therefore be at the heart of the Nature Recovery Network. National Parks have a specific statutory purpose to conserve and enhance natural beauty, wildlife and cultural heritage, and should be places where wildlife is thriving, nature recovery is happening at scale and biodiversity loss is being reversed more quickly than in the rest of the country. However, unfortunately much greater effort is needed to ensure this happens. There is plenty of evidence to demonstrate that the condition of biodiversity in National Parks is not currently bucking national trends in terms of species decline. For example, data included in our 2018 report *Raising the Bar*¹ shows that a lower percentage of SSSIs within National Parks are in favourable condition (25.3%) than the national average (38.5%). The LNRS guidance must, therefore, place a strong emphasis on the delivery of nature recovery in designated landscapes with mechanisms to ensure that Natural England and government are ultimately responsible for that delivery. A much stronger emphasis on nature recovery in National Parks is absolutely essential if the Government’s ambitions for 30x30 are to be achieved.
4. If the contribution of National Parks to the Nature Recovery Network is to be maximised, then National Park Authorities (NPAs) must always be the responsible authority for the LNRS for their area. The legislation as currently drafted allows for this but does not require it and yet it would be completely inappropriate to split a National Park between

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<https://www.cnp.org.uk/sites/default/files/uploadsfiles/Raising%20the%20bar%20improving%20wildlife%20in%20our%20National%20Parks.pdf>

more than one LNRS which could be the case were a body other than the NPA to be appointed as the responsible authority for that area.

5. To be effective, the LNRSs will need to be developed and implemented in partnership with farmers, landowners and other key stakeholders so there are significant opportunities to build on the approach that NPAs already use for developing their Management Plans. NPAs have a long history of working in collaboration with a range of relevant partners to agree priorities and actions for nature's recovery as part of these Plans which are often now called Partnership Plans in recognition of the partnership approach used for their development and implementation.
6. Another important reason why NPAs should take the lead on the LNRS for their area is that they are local planning authorities, with responsibility for both plan-making and planning decisions in their area. This means the NPAs are able to adopt a consistent approach across the whole of the National Park area regardless of local authority boundaries resulting in a clearer focus on the National Park purposes. One of the key mechanisms for delivering the objectives in the LNRS will be the Local Plan so it will be essential to make sure that there is good alignment between the Local Plan and the LNRS in each case. The best way of ensuring this happens in National Parks will be to make the NPA the responsible authority. Once again this is an opportunity to build on existing practice as most NPAs already make clear links between their Local Plan and their Management Plan. Several now include a common vision in both documents and some even have a shared set of objectives. Building on these existing partnerships and arrangements will ensure an integrated approach to nature recovery in all the Parks.
7. The best way of ensuring successful LNRSs in National Parks would be to make NPAs the responsible authority and strengthen the Management Plan process including through the introduction of specific requirements on other relevant organisations to participate in their development and implementation. There is also a need to amend the current weak duty "to have regard" to National Park purposes (often referred to as the S62 duty) to a much stronger duty "to further" the purposes to ensure all relevant organisations are taking effective action. Strengthening the S62 duty would also help ensure that all relevant LNRSs are properly supporting National Park purposes.
8. If NPAs are not to be the responsible authority, then it is absolutely essential that they have a role in the governance structure of relevant LNRSs and that those LNRSs are required to take account of the priorities and actions in the National Park Management Plan. There should also be a requirement for responsible authorities to take account of the Management Plans for any National Parks adjacent to their area and to involve the relevant NPA in the preparation of the LNRS. This should be implemented through the introduction of a duty on responsible authorities and NPAs to co-operate with each other.
9. Finally, all responsible authorities will need sufficient resources and capacity in order to be able to deliver LNRSs effectively but NPAs have seen a real-terms cut in their grant in recent years. This decline in budgets must be reversed and NPAs must be provided with adequate funding to ensure this important new measure is a success.

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk)