National Parks HEALTH OCHECK REPORT NATURE RECOVERY EXECUTIVE SUMMARY





EXECUTIVE SUMMARY



1. Introduction

From the peaks of the Lake District and the ancient rainforests of Eryri to the wild moorlands of Dartmoor and the waterways of the Broads, National Parks have so much to offer both people and wildlife. These places remain as important to the nation today as they were when they were first conceived 75 years ago; their founding vision – places where every citizen could immerse themselves in the wonders of nature – remains as relevant today. While it is clear that nature in National Parks faces many challenges, just as it does across the UK, these landscapes contain many of the last fragments of priority habitat and the last refuges for many species on the brink of extinction. There can be little doubt the situation would be even worse if these areas had not been designated in law and benefitted from additional planning protections and the oversight of a dedicated National Park Authority (NPA).

This report sets out the first full assessment of how well the National Parks of England and Wales are supporting nature recovery. It provides evidence of the current situation and identifies the changes needed to policy, legislation and practice in order to secure the step-change in progress that is so urgently needed. Our research included analysis of all the existing and publicly available data, a review of the National Park Management Plans and discussions with NPA officers. It covered both England and Wales. This means we have been able to compare the situation in the two countries and to identify opportunities for sharing good practice between them as well as between the individual National Parks.

Image: Cat Bells, Lake District by Stewart Price

2. Why prioritise nature recovery?

The nature and climate crisis is the biggest threat we have ever faced: globally, nationally and locally. *The State of Nature Report 2023*¹ shows alarming and continuing declines in the state of our wildlife and there can be no doubt that there is now an urgent need to halt and reverse those declines.

National Parks have the potential to make a significant contribution, especially as wildlife rich landscapes are an essential part of the purposes for which these areas were designated. Put simply, making National Parks better is fundamental to tackling species extinction and biodiversity loss². It is also essential that there is a strong emphasis on protecting and restoring nature in National Parks if these areas are to justify international recognition as Protected Landscapes³.

As a signatory to the Convention on Biological Diversity (CBD) Kunming-Montreal Global Biodiversity Framework⁴, the UK has committed to protect 30% of land and sea for nature by 2030, and both the Westminster and Welsh Governments have made domestic commitments in line with this international target, known as 30x30. Covering 10% of land in England and 20% in Wales and including large areas of our remaining resource of semi-natural habitat, National Parks are key to achieving these targets. However, it is clear that National Park designation alone is not sufficient to meet the guidelines⁵ on what should be included in the 30%. We've calculated that only 6% of the total land area of National Parks is currently managed effectively for nature when considering the total area of SSSI sites in National Parks assessed as being in 'favourable' condition. Significant changes are needed if more of these areas are to count towards the 30% target. National Parks also have a critical role to play in delivering national level targets for restoring certain habitats and in achieving targets to halt and reverse the declines in the abundance of species in both England and Wales.

We recognise the importance of National Landscapes (Areas of Outstanding Natural Beauty (AONBs)) to deliver these nature commitments. Many of the points we raise in the report may also apply equally to National Landscapes. But we have not reviewed data for these areas due to the scale of the work involved; these important National Landscapes remain out of scope for this report.

We've calculated that only 6% of the total land area of National Parks is currently managed effectively for nature.

Campaign for National Parks first called for wilder National Parks over 30 years ago in a report called Wild by Design. Since then, the idea of managing land in a way which allows natural processes to shape the landscape and habitats has grown in popularity. Regenerative and nature-friendly farming is becoming widespread, supported by NPAs. There are now a growing number of examples of rewilding being adopted in National Parks. Social research has shown a strong support for National Parks and a clear desire among the general public for National Parks to play a far more effective role on nature recovery. Every test of public opinion, including our 'Big Conversation' in 2016, National Parks UK research in 2018, surveys by RSPB in 2021, and Green Alliance in 2023 have shown that nature is what people most value and want to see prioritised. A survey by Rewilding Britain⁶ found that 83% of the public support Britain's National Parks being made wilder, with areas set aside specifically for rewilding.



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ONLY 6% OF THE TOTAL LAND AREA OF NATIONAL PARKS IS CURRENTLY MANAGED EFFECTIVELY FOR NATURE.

CASE STUDY: Hepple Wilds⁷ Northumberland National Park

The Hepple Estate consists of around 1600 hectares (6.25 square miles) of open moorland and fells in Northumberland National Park. In 2020, Hepple's owners introduced a 'managed wilding' plan which includes pulsed organic grazing, tree and shrub planting, wetland creation and the 'smudging of hard edges' to create a more biodiverse landscape.

Image: Hepple Estate, Northumberland

3. How is the land in National Parks owned and managed?

With small exceptions, most NPAs own very little or no land in the National Parks (Bannau Brycheiniog owns most at 13%, followed by Exmoor at 9%)⁸. Around 14% of land in English and Welsh National Parks is in some kind of public ownership, including the Crown, forestry bodies, the water companies and the Ministry of Defence, or is owned by large NGOs such as the National Trust. Most National Parks land is privately owned and the NPAs, therefore, have little control and influence over it. A third (33%) of all National Park land is semi-natural grasslands and a further quarter is 'improved grassland' i.e. regularly fertilised and/or intensively managed for grazing animals or cutting hay. 16% of the National Parks is woodland with just over half of this broadleaf and just under half coniferous (the latter is almost certainly commercial forestry plantations). Less than 2% of the Parks are made up of built-up areas (classified as urban or suburban). Most land in National Parks in both England and Wales is grazed by farm animals, with only a small proportion (6%) for growing crops.

Public land ownership totals by National Park

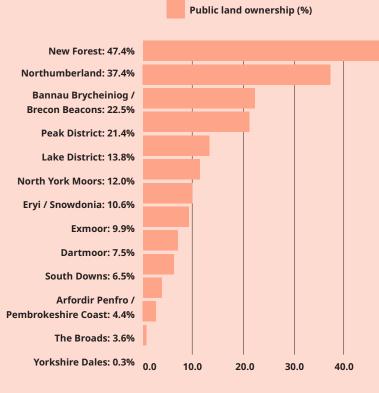




Image: Peak District by Lauren Simmonds





4. What is the current state of nature in National Parks?

It quickly became apparent that it would not be easy to obtain the data we needed, largely because many relevant existing datasets – on habitats, species and water quality – are not cut to National Park boundaries. We had to commission additional analysis. Well over a decade on from Professor Sir John Lawton's *Making Space for Nature* report, which included analysis on priority habitats and species in National Parks and recognised National Parks' potential as exemplar ecological networks, there has been no real progress in the understanding of the state of nature in National Parks.

Peatland health

National Parks contain a significant proportion of the nation's peat. Peatlands support important wildlife habitats and species and play a vital role in carbon storage as undamaged bogs remove carbon dioxide from the atmosphere through photosynthesis in mosses and other plants. Healthy peatlands also alleviate flood risk and reduce the amount of treatment needed to provide high quality drinking water. However, many of these benefits are lost when peatlands are damaged by activities such as drainage, burning, overgrazing, afforestation, pollution and peat extraction, and degraded peatlands result in emissions of carbon dioxide to the atmosphere.







Peat accounts for 43% of the land area in the English National Parks and 8% of the land area in the Welsh National Parks. In both cases, this is significantly higher than the proportion nationally (peat is 11% of land cover in England and 4% in Wales). Data specifically on the condition of peatlands in National Parks is not publicly available. However, various studies in recent years have indicated that between 70% and 80% of peatlands in the UK are damaged. Data that is available for individual National Parks paints a poorer picture (e.g. an estimated 1% of Dartmoor's deep peat area is healthy⁹). It is reasonable to assume that the majority of peatlands in National Parks are in poor condition and that urgent action is needed to address this. Such action should include giving much greater priority to the rewetting and restoration of all types of peatlands in our National Parks, through significant investment to scale up brilliant initiatives such as the South West Peat Partnership, Moors for the Future, the Yorkshire Peat Partnership and the Great North Bog.



OF CARBON

Image: Peatland restoration on Bodmin Moor by South West Peatland Partnership

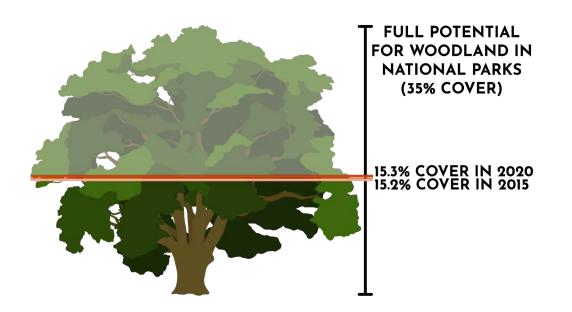
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Woodland health

Both the Westminster and Welsh Government have set ambitious targets for woodland expansion. Research¹⁰ has identified the potential to double the amount of woodland in National Parks without infringing on other important habitats and land uses. Our analysis identified that there was virtually no change in woodland coverage across all the National Parks with a total expansion of just 8 square miles across all the National Parks in the five years to 2020. Four Parks – Yorkshire Dales, Peak District, Lake District and Bannau Brycheiniog - delivered most of the total increase. However, figures for overall coverage do not distinguish between different types of woodland. While native, broadleaved trees play a vital role in carbon storage, as well as being essential for supporting a rich variety of other species, non-native trees generally support

lower levels of biodiversity and plantations on peatlands can result in the loss of both biodiversity and carbon storage. In some of the National Parks with high levels of woodland coverage, a significant proportion of this woodland is made up of non-native conifers.

National Parks include 38% of the total area in England and Wales with the appropriate climatic conditions for temperate rainforest, a habitat which is now thought to be more threatened than tropical rainforest. Our analysis found that between 2% to 3% of the land area in six National Parks – Bannau Brycheiniog, Dartmoor, Eryri, Exmoor, the Lake District and Pembrokeshire Coast – has potential for restoration as temperate rainforest.





CASE STUDY: Snaizeholme" woodland creation, Yorkshire Dales National Park

The Woodland Trust is creating one of the largest new native woodlands in England on 600 hectares (around 2.3 square miles) of former farmland in Snaizeholme in the Yorkshire Dales. The project supports a diverse mix of other habitats too including riverside pasture, peat bogs and limestone pavement.

CASE STUDY: Save Windermere, the Lake District

In 2022, United Utilities caused 5,904 hours of raw sewage to spill into the Windermere catchment. The EA permits the company to pour in 13 million litres of 'treated' sewage every day. Campaigner Matt Staniek set up Save Windemere to fight for the complete removal of all sewage, arguing that as England's largest and most iconic lake, the regulator should uphold the highest standards. Just five of the 880 water bodies in National Parks meet the highest status

Image: Harriet Gardinei

Freshwater health

The waterways of the National Parks are iconic. For example, the Broads is the most biodiverse wetland in the UK, with a mosaic of habitats that contain more than a quarter of Britain's rarest animals and plants; Eryri and the Lake District have spectacular glacial lakes; from the South Downs spring a significant proportion of the world's chalk streams.

In England, our analysis found that in 2022, 39% of rivers and 15% of lakes within National Parks achieved good ecological status or higher (compared to all country figures of 14% for rivers and 14% lakes¹²). The main reasons water bodies failed to be in good health included: pollution from agriculture, water company sewage pollution and historic physical modifications e.g. straightening or deepening a river for land drainage. The situation is worsening over time, with the proportion of National Park rivers meeting good ecological status or higher dropping from 47% in 2013, to 39% in 2022 and lakes declining from 18% to 15% over the same period. In Wales, latest available data (2021), shows that 51% of rivers and 21% of lakes in National Parks achieved good overall status, or higher (compared to all Wales figures of 44% for rivers and 19% for lakes¹³).

Just five of the 880 water bodies in National Parks meet the highest status: three headwater rivers in Northumberland's Cheviot Hills, and one lake (Burnmoor Tarn) in the Lake District and one in Eryri (Llyn Idwal). Even in the most pristine rivers and lakes in England's National Parks, traces of toxic chemicals are found, resulting in not a single water body in an English National Park being in good overall health¹⁴. The health of water bodies in each National Park showed wide variation, largely a factor of geography and population, with upland National Parks typically faring better than lowland ones. Restoring rivers and lakes to health will require working beyond the National Park boundaries (as exemplified by the Broads NPA which co-hosts the plan for the catchment which is around 100 times the size of the Park).

Sewage pollution is one of the main reasons for failure. In a single year (2022) there were 377 sewage releases from storm overflows within the boundaries of National Parks in England and Wales totalling 176,818 hours (equivalent to 7,367 days). The water companies responsible for the most sewage discharges in National Parks are Dwr Cymru in Wales and United Utilities, South West Water and Southern Water in England. The National Parks most badly affected (according to hours of spills) are Dartmoor, Eryri, Lake District, South Downs and the Yorkshire Dales.



Protected Areas health

Parts of National Parks have been identified as being of national or international importance for biodiversity and are designated as Sites of Special Scientific Interest (SSSIs) or other Protected Areas. Most SSSIs are privately owned, and oversight for their condition rests with Natural England (NE) and Natural Resources Wales (NRW). In England, only around a guarter of SSSIs in National Parks are in favourable condition, compared to an average of 38% across all the SSSIs nationally. In Wales, around 23% of SSSI features in National Parks are in favourable condition (slightly better than those outside at 19%). There is significant variation between the National Parks: 60% of SSSIs in The Broads, and 53% in the New Forest and the South Downs are in favourable condition, but in five of the Parks – Dartmoor, Exmoor, North York Moors, Peak District and Pembrokeshire Coast - the equivalent figure is less than 20%.

Concerted action is needed to improve the condition of Protected Areas in National Parks. These figures do not even provide a complete picture as there is no up-to-date monitoring information for the majority of SSSIs. Where assessments have been undertaken, the reasons for poor condition which featured most frequently included mismanaged livestock grazing (either under grazing or over grazing); pressure from deer browsing; the spread of invasive species; water pollution and human impacts including burning, the presence of active drainage or damage from tractors.

FAVOURABLE CONDITION OF SSSI SITES INSIDE NATIONAL PARKS ENGLAND 24% WALES 23%

only around a quarter of SSSIs in National Parks are in favourable condition

CASE STUDY: Ffermwyr yr Wnion, Eryri National Park

Ffermwyr yr Wnion is a group of ten farms all located within the Afon Wnion catchment. The project aims to collaboratively address local issues of flood risk and water quality as well as looking to bring benefits to biodiversity, pollinators, and air quality, whilst also helping tackle climate change.

Numerous pools and ponds have been created across the holdings as well as 7,725m hedgerows helping to prevent soil erosion and stop sediment and organic material from reaching the streams and rivers, thus improving water quality.



CASE STUDY: Beaver reintroduction trial, North York Moors National Park

In 2019 beavers were released in Cropton Forest as part of a five-year scientific trial aimed at slowing the flow of water and reducing flooding downstream. As the trial comes to a conclusion there's evidence that beavers have had a positive impact by creating dams that are superior flood barriers to man-made structures in the area. Researchers from Exeter and Leeds Universities are compiling results from here and other locations to inform future reintroductions.



Species health

It proved impossible to get the data necessary to undertake a comprehensive assessment of how the relative abundance of key species in National Parks has changed over time. However, an analysis of over 10 million wildlife sightings in National Parks, recorded on the National Biodiversity Network Atlas since 2000, provides a useful insight into the presence of certain key species of concern and an indication of where more survey effort may be needed in future.

The South Downs has by far the highest number of records, more than double the number that exist in any of the other Parks. The Broads has by far the highest density of records with over 3000 records per km². The number of different types of species recorded varies significantly between the Parks, with the records for Eryri covering over 9000 different species, while those for Northumberland cover fewer than 3000 species. Priority list species which are declining nationally were sighted in all 13 National Parks, include cuckoo, hen harrier and curlew. Other endangered species are found in just a small number of Parks. For example, nightingales, which have declined nationally by at least 50% since 1995¹⁵, are found in eight National Parks, with the majority of sightings in the South Downs. Red squirrels have declined by at least 37% since 1993, but there have been sightings in the Lake District, Northumberland and the Yorkshire Dales. Beavers (a 'keystone species' whose activities shape the local environment) have been

recorded in all but three of the National Parks, with the most records in the Peak District. It is clear that National Parks are currently among the last refuges for many species on the brink of being lost from the UK. Now we need to ensure they become the places from which these species recover and are able to spread.



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Bird crime

Raptor (bird of prey) persecution is a particular problem in several of the National Parks. In the last five years, 56 out of 62 incidents reported in the National Parks took place in just three of them – the Peak District, the North York Moors and the Yorkshire Dales. In 2022, at least 70% of all confirmed raptor crimes across England and Wales were associated with gamebird shooting¹⁶. The chances of being caught and convicted for this type of offence are very low. There were only two raptor persecution related convictions across the whole of England in 2022¹⁷, and the most recent conviction in Wales was in 2012¹⁸.

5. What do National Park Management Plans tell us about nature recovery?

Every NPA is legally required to prepare and publish a Management Plan setting out the priorities for the future management of the area¹⁹. NPAs are reliant on a range of other organisations, including major landowners and public bodies such as Natural England (NE) or Natural Resources Wales (NRW), water companies, Forestry England and local authorities in their area, to implement many of the actions needed to deliver the Management Plans. National Parks will only be able to make a significant contribution to delivering the 30x30 target if these Management Plans include strong targets on nature recovery and there are mechanisms in place to require all public bodies to both contribute to the delivery of those targets and ensure the targets are monitored and delivered. We assessed all 13 Management Plans, focusing on habitat restoration, species recovery and water quality. Our assessment focused primarily on the main Management Plan documents for each National Park, but we have also looked at other related documents such as State of the Park Reports.

Baseline information on state of nature

Good information on the situation at the start of the plan period is essential for understanding the scale of challenge that needs to be addressed and for assessing progress at a later stage. Although there is sometimes relevant information available in other published documents, most of the Management Plans contain very little baseline information and none of them provide baseline data for all three topics (habitats, species and water quality). Only **3 out of 13 Management** Plans (Bannau Brycheiniog, Lake District and New Forest) include baseline data for at least two of these topics and this is generally limited to information about SSSI condition, woodland coverage and water quality. Many of the other Plans include only a single piece of data on one of these topics. Most significantly, **4 out** of 13 Plans (Exmoor, Northumberland, Peak District and Pembrokeshire Coast) include no information at all on the state of nature at the start of the Plan period.

4 out of 13

Management Plans include no information at all on the state of nature at the start of the Plan period.

Image: Cheriton Conservation Volunteer Group, South Downs

NPAs are reliant on a range of other organisations, including major landowners and other key stakeholders, to implement many of the actions needed to deliver the Management Plans.

3 out of the 13 Management Plans

contain no specific, timebound targets.

> Image: Cameron's Cottage, New Forest, by Anneka Scholfield, RSPB

Targets: ambition for nature included in the Plans

Many of the Plans include ambitious statements about what they are intended to deliver for nature but lack specific details, such as the size of area to be improved by a certain date, needed for these to be meaningful targets. 3 out of the 13 Management Plans (Exmoor, Pembrokeshire Coast and the South Downs) contain no specific, timebound targets. However, in some cases, effective targets have been developed since the Plan was published. For example, the Exmoor Nature Recovery Vision published in 2020 includes an ambitious and detailed set of targets particularly focused on restoring different types of habitats by 2030. The fact that one Plan – the Yorkshire Dales – includes specific, timebound targets for habitats, species and water quality, such as "all the blanket bog in nationally and internationally important wildlife sites is 'recovering' by 2024" shows that it is possible to develop equivalent targets for all 13 National Parks.

Assessing progress on nature recovery

The approach to assessing progress against each of the Management Plan targets varies significantly between the Parks and this can make it hard to understand what progress is being made. The Yorkshire Dales leads the way with the publication of an annual progress report and a section on its website, which includes pie charts showing how many of the Management Plan objectives have been achieved, are on course etc. However, their most recent assessment²⁰ concluded that the only area where targets were on course to be achieved was in relation to water quality. At the time we completed our analysis there had been no assessment of progress published for 11 of the 13 current Management Plans.



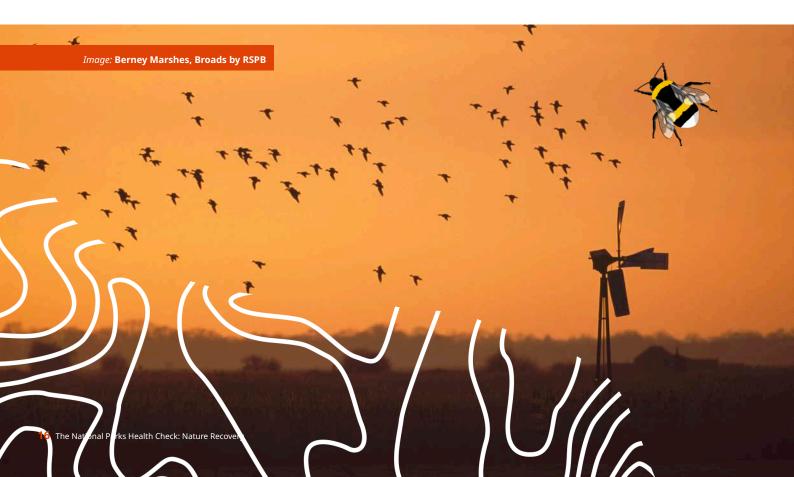
6. Why is so little progress being made?

It is clear from the case studies compiled for this report that progress is being made, with good examples in every National Park of nature recovery initiatives, led by a range of groups and individuals including farmers, NGOs, volunteers, public bodies and NPAs. However, the evidence shows that the scale and pace of these initiatives is not keeping pace with the rate of biodiversity decline. From the data and evidence gathered, and the analysis conducted, combined with conversations with NPA officers and Board members from 12 of the National Parks, and with other expert members of our Council, we have identified three underlying issues:

NPAs have limited control over what happens on most land in National Parks.

NPAs are reliant on a range of organisations, including the major landowners, land managers in the National Park and other key stakeholders such as the statutory bodies and local authorities in their area, to implement many of the actions needed to deliver the Management Plans. Management Plans are for the National Park rather than just the NPA. However, there was a lot of concern among NPAs about being accountable for nature recovery, and delivery of the Management Plan, without the necessary supporting mechanisms in place to require others to take action.

In December 2023, legislative changes introduced through the Levelling Up and Regeneration Act (LURA) 2023, placed new requirements on public bodies and statutory undertakers in England to contribute to the development and implementation of Management Plans and to seek to further the statutory purposes of National Parks as well as introducing more robust monitoring and enforcement of public bodies' compliance with existing biodiversity duties. In England, this will help to address concerns, but guidance and secondary regulations are needed to reinforce these new requirements and should be published as a matter of urgency to ensure compliance. Similar measures need to be introduced in Wales to ensure that all relevant parties are contributing effectively to Management Plans.



One NPA told us that they could not be accountable for nature recovery as they do not have the powers needed to have any control or influence over it. Discussions identified a large number of changes to policy and legislation which are necessary in order to support nature recovery in National Parks, including where current weak legislation is failing (e.g. water pollution, raptor persecution, peatland burning). As another NPA officer made clear, they know what the problems and the solutions are, but national policy changes are required to deliver those solutions.

Rational Parks were designed for a different era.

When the National Parks of England and Wales were first created in the 1950s, they were selected as places incredibly rich in nature. The designation was designed to conserve and enhance that richness, so citizens could walk totally immersed in the wonders of nature. At that time the main concern was to protect the countryside from increasing urbanisation and there was not really considered to be any need to worry about the impact of rural land uses on nature. National Parks have changed significantly in the intervening decades.

The challenge now is to support communities, farmers and commoners to thrive by managing land in a way which provides for wildlife, carbon sequestration, catchment management and health and wellbeing – thus providing the benefits that society demands from National Parks today. In the context of a nature and climate emergency, driving change that integrates and delivers for both natural and cultural heritage requires radical thinking. Historic intensive land management and damaging practices, such as the draining, burning and afforestation of peatlands, underand over-grazing, heavy use of pesticides and industrial fertilisers and pollution of waterways will need to be phased out, making way for the rapid expansion of regenerative agriculture and land management, including river restoration and rewilding. For rural communities to thrive and prosper, requires a careful and just transition. Ensuring all this happens will require significant changes to the legal framework and the way National Parks are run and managed. During our discussions,



it was clear that, among other changes, this will require culture change in some NPAs, including reforms to governance. Information reported by NPAs suggested that there were too few people on Boards, and in dedicated roles on the staff body, with expertise in nature recovery or related fields. NPA Boards are not representative of the population, who, in the main, think nature should be the priority in National Parks. The leadership culture in some NPAs needed to be much more vocal and ambitious for the scale of change required and more assertive about holding others to account.

NE, the Environment Agency (EA) and NRW have a crucial leadership role to play as regulators and as advisors. A solid foundation of evidence is vital for informing solutions, demonstrating impact, building trust within communities and holding public bodies, government and NPAs accountable. Our findings suggest that this support has been very limited at times and lack of enforcement action is a critical issue. The many examples which suggest that National Parks are not considered as a priority by these bodies include that data is not readily available to National Park boundaries; that Wales statutory Area Statements and England's statutory Local Nature Recovery Strategies are not consistent with National Park boundaries meaning Parks are being split into pieces for the purposes of regional nature recovery planning; and that the water company price review process did not require any particular focus on National Park status. All this will need to change to deliver 30x30.

The lack of resources available for nature recovery in National Parks.

From the available data on NPA spend on nature recovery, it is clear that this represented only a small fraction of overall budgets in 2022/23. The funding available does not match the national role that National Parks are expected to deliver for nature recovery. Much of the nature recovery income came from external projects which are often short term, making it hard to retain skilled and knowledgeable project staff, or make sustained progress. There is no specific allocation from Government core grants for nature recovery. Most of the NPA officers we spoke to identified lack of resources as being the main barrier to making progress.

NPA budgets have been cut by 40% in real terms over the last decade, affecting their ability to deliver certain areas of work and the need to deal with the implications of such reductions has distracted NPAs from taking the lead on nature recovery. Years of swingeing government cuts have resulted in a situation where NPAs and regulators have cut spending down to the bone. These damaging cuts have not just affected the ability to materially deliver but they have also hindered the NPA's leadership role around nature recovery. In some National Parks, it has resulted in what at times feels like an over cautious and unambitious mentality – with ambitions constrained by the severely cut budget.

NPA budgets have been cut by 40% in real terms over the last decade, affecting their ability to deliver certain areas of work There is an urgent need to ensure payment rates reward the multiple benefits National Park farmers and land managers provide to safeguard nature and rural livelihoods.

Historically, as 'low value' agricultural land (and contributing a small proportion to food supply), National Parks have received a low proportion of the total £2.5bn farm subsidies available in England and Wales. Small-scale horticulture received none. With the transition in England and Wales to a 'payment for public goods' model, this historic trend needs to be reversed given the significant value in terms of natural and cultural heritage. As basic payments are phased out, farm business incomes will significantly decline and there is real concern that new schemes will not fully compensate this loss. There is an urgent need to ensure payment rates reward the multiple benefits National Park farmers and land managers provide to safeguard nature and rural livelihoods. In England, Farming in Protected Landscapes (FiPL) was cited by NPAs as providing a good basis to engage with land managers. The £100m funding committed to FiPL for distribution between 2021 and 2025. enabled NPAs to invest in nature outcomes via dedicated project officers, but the short-term nature of the funding hinders potential to deliver maximum returns. It was clear from our discussions that well-targeted and sufficiently scaled agri-environment incentives, tightly aligned with Management Plans, could make the most significant difference for nature recovery in National Parks. There is also a need for long-term funding commitments to enable the kind of long-term planning that is needed to properly protect and improve nature in our National Parks.

Image: New Forest by Dawn Brown

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7. Reforms for healthy nature in National Parks

Nature is in crisis across the UK and our research has shown National Parks are no different. The problems facing nature in National Parks are *in spite of* National Park status – not because of it. We have no doubt that without the existing legal protections in place, and actions by NPAs and others, things could be much, much worse. As noted in the *State of Nature Report 2023*, systemic changes are needed to tackle the nature emergency across the UK, which also applies to National Parks. Here, in addition, we offer some reforms specifically for National Parks, to accelerate and prioritise nature recovery in these places. It is likely that some of our proposals will also apply to National Landscapes.

2024 is the 75th anniversary of National Parks: it's also an election year, and one which sees a new First Minister in Wales and a new Government in England. We have therefore focused our recommendations on the actions that Governments and their agencies can take, whilst recognising that it's on all of us – including NGOs, volunteers and concerned citizens – to ensure nature thrives in National Parks in future.

Based on the evidence, we have concluded that four big reforms and one quick win are needed to restore nature in National Parks to health.

Reform no. 1.

Make it clear: National Parks are for nature.

Landscape designations <u>are</u> nature designations.

Governments in England and Wales must be unambiguous in their expectations and set out reforms to ensure that National Parks are deemed as nature designations, as well as landscape designations. For example, National Park water bodies should be high priority, alongside Bathing Waters and Protected Areas for purposes of water planning. In England and Wales, there is a clear need for legislation to emphasise and prioritise nature recovery, and to reform NPA governance to place greater emphasis on nature recovery in decision-making; requiring a greater proportion of Board members to have relevant expertise; and for all members to have relevant training. In England, the Government must make use of new powers under the Levelling Up and Regeneration Act 2023 to make regulations to require Management Plans to contribute to meeting statutory biodiversity targets and set out expectations for how all public bodies must support this (including water companies, Government departments, Forestry England, NE, EA and NPAs). New National Parks in England and Wales must be designated with a clear purpose and mandate to drive nature recovery across land, coast and sea.

Governments' national nature agencies have an important leadership role to play and must prioritise the importance of National Parks to nature recovery, targeting action in these landscapes. NE, NRW, EA and the Joint Nature Conservation Committee (JNCC) are Government bodies responsible for nature. Forestry England and Ofwat also have critical roles. Given the importance of National Parks to protect 30% of land for nature by 2030, these agencies should collectively place greater emphasis on the condition of habitats and species across the National Parks.

Some **National Park Authorities** have already made clear, ambitious and demonstrable commitments to driving the changes needed to secure nature recovery. We encourage all to embrace this, for example, by advocating for the necessary changes in policy, and holding others to account, based on their extensive expertise and experience. There should be greater emphasis on nature recovery in all decision-making, including planning, all members should have nature recovery training and there is potential for greater recognition and prioritising of the ecological skills and knowledge embedded in staff teams.

Reform no. 2. A New Deal for National Parks.

National Parks have a rich cultural heritage in land management that regenerates nature and an emerging culture of creating new ways for nature and communities to thrive together. It is clear from numerous exemplar case studies that investment is needed to scale up these practices.

To ensure National Parks survive and thrive into the next century Governments should double core

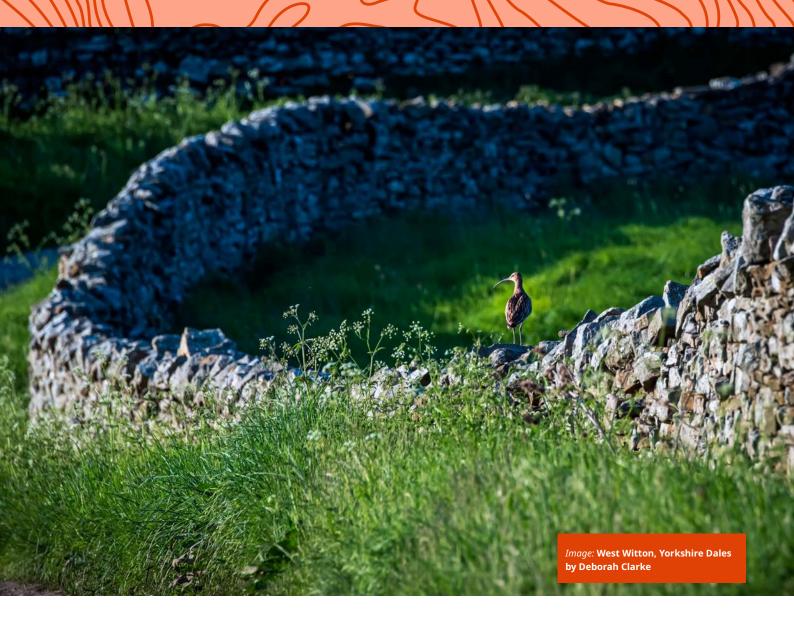
funding of NPAs. Core NPA grants, currently make up a tiny proportion of Government environment funding: a doubling will restore budgets in real terms, to 2010 levels. In return, Government should set out clear expectations for delivery on nature recovery, public access and inclusion and other key outcomes including leveraging other monies. The funding formula that allocates the grant to NPAs is "fossilised and complex"²¹ and should focus on delivery of outcomes. Funding commitments are needed long-term for the next decade and beyond. Given there is a precedent (for example, spending on agri-environment schemes has in the past been allocated for 10–15 years), we see no reason why a similar period of investment should not be provided to National Parks.



The NPA core annual grant (\pounds 65m in 2022/23 for the 13 Parks) is a small proportion of overall public investment in these places. This is far surpassed by farming subsidies, investment made by water companies, forestry and other public bodies. It is imperative that there is strong alignment of this investment with Management Plans in order to realise the estimated £1bn investment needed for nature recovery in National Parks.

Farmers and land managers hold the key to nature recovery in National Parks: agri-environment schemes are essential to driving change. There is a clear case for National Parks to receive much greater support in recognition of their special qualities and statutory purposes. Governments in England and Wales must significantly scale up incentives in National Parks with a focus on landscapescale recovery and supporting farmers to adopt practices to enable nature recovery. These schemes should provide proper long-term assurance and support to encourage investment in the kind of changes in land management needed to deliver 30x30. There should be a just transition supporting farmers and land managers, particularly in the uplands, to adapt to the phasing out of basic payments, and the adoption of land management practices that will drive public goods. This is critical to retaining rural communities and cultural heritage that make National Parks so special.

Support should cover: regenerative agriculture, the adoption of appropriate grazing regimes, natural regeneration, targeted action for species recovery and maintenance and protection of priority habitats. Rewilding should be recognised as a legitimate and potentially beneficial land management choice. Where it is an appropriate management choice for nature recovery those who wish to adopt it, should be rewarded and supported to do so. In England, scaled up funding should be available via the Landscapes Recovery tier of Environmental Land Management (ELM) to deliver agreements across every National Park. The Farming in Protected Landscapes (FiPL) scheme should also be scaled up and embedded in ELM, with NPAs empowered to make decisions aligned with Management Plans. In Wales, the Sustainable Farming Scheme (SFS) needs to give assurances to farmers that collaborative and optional nature-friendly farming actions will be rewarded and incentivised within National Parks. NPAs in Wales should be recognised as key delivery partners in the scheme and there should be early commitments to sustained capital funding to deliver landscape-scale projects.



Public bodies, such as Forestry England, NRW, the Ministry of Defence (MoD) and water companies must be required to align investment for nature recovery. In England, the Levelling Up and Regeneration Act 2023 placed stronger duties on these bodies who manage land and operations in National Parks. This series of important, pro-active duties now require all public bodies to "seek to further" the statutory purposes of National Parks (and National Landscapes) including the enhancement and conservation of wildlife and natural beauty. This new law requires a significant change in approach compared to previous duties and must be complied with as part of any decision or course of action that has implications for National Parks. This should unlock significant investment, for example, it should directly result in greater water company investment in National Park water bodies, and whilst the legal requirement is live right now, the publication of guidance and regulations is urgently needed to ensure rapid implementation and secure compliance. In Wales, the weaker "have regard" duty needs to be strengthened, and aligned with the Environment (Wales) Act 2016, to require greater prioritisation of investment and action.

In those National Parks where public bodies own and manage significant land holdings, they should also be required to contribute towards the cost of habitat restoration, recognising the "polluter pays" principle. For example, the MoD should contribute towards peatland restoration where unexploded ordinance can add to the cost; the forestry bodies should be required to remove plantations to restore peatland habitats and tackle issues with self-seeded conifers; and water regulators must ensure that water companies reduce pollution and comply with high standards across all National Park waterways.

A Climate Peatlands Fund should be established to fulfil the huge potential for carbon sequestration.

Voluntary carbon markets are growing rapidly and, while the UK Peatland Code offers voluntary certification standards, projects registered under the code remain relatively small. Governments in England and Wales should introduce measures to mobilise private sector investment, underpinning voluntary codes and markets with a regulated framework that provides long-term certainty for business and ensures that investment is delivering for nature aligned with Management Plans. This should be primed with a long-term commitment to Government investment in peatlands.

Reform no. 3. Enforce the law and create new powers to halt harm and drive recovery.

When National Parks in England and Wales were created 75 years ago, it was on the basis that the state did not need to own the land as they could control it via the planning process. While this model has had success in terms of stopping the rapid urbanisation and industrialisation seen outside the Parks, it has not delivered the scale of change needed for nature. The 'New Deal' for National Parks must provide the incentive framework to drive change, underpinned by new powers and enforcement.

Enforce the law

Favourable condition of SSSIs should be achieved as quickly as possible and should be prioritised in National Parks. NE and NRW already have significant legal powers to do this, including requiring consent for any activity that may damage the SSSI and issuing legal notices to require action if the SSSI is not being cared for or is being damaged for example by sewage pollution, burning, inappropriate levels of grazing or use of chemicals or fertilisers.

All priority habitats within National Parks outside of SSSIs (for example semi-natural grasslands, peatlands, rivers, lakes and woodlands) should be designated as SSSI or benefit from a level of protection that is at least equivalent.

Good ecological status of water bodies, required under the Water Framework Directive, should be achieved as quickly as possible. All consents and permits issued by the EA or NRW within the National Parks (for example, for sewage overflows, wastewater treatment works or water abstraction) should meet the highest standards and ensure no harm, with enforcement and monitoring to ensure compliance.

Planning conditions imposed by NPAs should be enforced and swifter action taken when planning laws are breached.



It is clear good regulation and successful compliance is completely dependent upon sufficient staffing at regulators, to advise, ensure decisions are based on evidence, with sufficient weight applied to local knowledge as well as natural and social sciences. Above all, the regulatory process must be transparent, well-communicated, with clear appeal and escalation mechanisms. Adequate staff time and a consistent approach are needed to deliver the agreed outcomes. The lessons from the Dartmoor commons, and the pollution of the Lake District, should not be for regulators to step away from their regulatory roles, but to invest in them. The NPAs also have a key role to play to support compliance through facilitation and Management Plans.

Create new powers to halt harm and drive recovery

These should include:

- A ban on all burning and afforestation on peatland and an end to commercial peat extraction in National Parks, irrespective of peat depth.
- New statutory priorities for all public landowners to prioritise nature recovery on land they own in National Parks and a duty on Forestry England/NRW to remove trees previously planted on peatland and restore these areas to good health by 2030.
- New powers to control activities that harm nature recovery in National Parks including the introduction of licensing for driven grouse shooting and the use of vicarious liability for wildlife crimes.

There is a very clear case for NPAs to have greater powers, to shape the natural environment as well as the built environment. In England, there is a major opportunity for a new Government to take the opportunity to further empower NPAs through regulations recently enabled by LURA 2023. This should include empowering NPAs to refuse plans or projects that could significantly harm or hinder wildlife or delivery of the Management Plan, with a new accountability mechanism allowing them to require contributions from other public bodies. In England and Wales, the delivery of 30x30 will require significantly more privately owned land to be effectively managed for nature. It is highly unlikely that this international commitment can be met without further NPA powers, contingent on the reforms to governance set out above.





Reform no. 4. A new 'People's Charter' to ensure National Parks thrive into the future.

When National Parks were created 75 years ago, it was under a 'People's Charter' that set out a vision that every citizen could walk completely immersed in nature, surrounded by the awe and wonder of our most special landscapes and wildlife. This vision should be the basis for a renewed social contract founded on:

- Celebrating and supporting people's connection with nature as an essential for nature recovery, ensuring that every citizen, no matter their age, race, class or where they live, feels welcome and connected to National Parks. This should be underpinned by new rights of access to land and water, coupled with a duty to behave responsibly and respect nature and those who live and work in rural communities.
- Embedding deliberative democracy and ensuring representative decision making via a Citizens' Assembly in each National Park, bringing together land managers, farmers, residents, visitors, people who have never visited, nature and climate experts and others to consider and inform the priorities for nature recovery and how best to achieve them.
- Reforms to support greater public and community ownership of land in National Parks, including a requirement that any land over a certain size is first offered for community or public purchase when put up for sale, supported by a Treasury-backed capital fund to support public sector purchase of land in National Parks.





One quick win: Provide the evidence on the state of nature in National Parks

This report shows that we still do not know enough about the state of nature across National Parks, and there is a clear role for all of us in helping address this. To enable this, the national nature agencies must provide the right supporting framework including:

- Undertaking more frequent and improved condition assessments for SSSIs.
- Supplementing existing programmes of monitoring and habitat surveys, such as England's Natural Capital Ecosystem Assessment, to ensure there is sufficient data from within National Parks.
- Publishing regular monitoring data on species, habitats and water quality, and other relevant datasets including coastal and marine environment, broken down by National Park.
- Providing a monitoring framework to enable comparable data between National Parks, including methods to include the millions of local records and support for citizen scientists.
- Supporting NPAs so that all National Park Management Plans include baseline data and specific, timebound and ambitious targets on species abundance and diversity, the condition of Protected Areas and priority habitats and water quality.
- Publishing updated Management Plan guidance as a matter of urgency.
- Establishing a centre of excellence for integrating natural science with social and behavioural sciences.
- At the UK level, with the JNCC, creating a knowledge sharing framework and publishing National Park nature condition across all devolved countries, learning from Protected Landscapes and Parks around the world.

What will we be doing to support nature recovery in National Parks?

Campaign for National Parks is a campaigning collective with a membership including individuals, all the Friends of National Park societies and national nature and access charities. Our main focus will be on advocating for the changes we have identified here and using these as a basis for discussion to develop these ideas further and collectively raise ambition. We have also identified a number of opportunities to support enhanced nature recovery through our own work, including:

- Working in partnership with our members and other NGOs such as British Trust for Ornithology and Butterfly Conservation to increase the number of citizen scientists collecting species data in National Parks so that in future there will be better, and more consistent, records for these areas.
- Providing support and producing a questionnaire for local partners such as the National Park Societies, to send to relevant bodies to monitor what they are doing to deliver their new responsibilities relating to Management Plans.
- Facilitating debate and undertaking further research to provide a better understanding of the legislative changes needed to ensure National Parks are at the heart of delivering 30x30.
- Increasing understanding of the role of National Parks in supporting nature recovery in coastal and marine environments as part of our new National Marine Parks project.
- Sparking a national conversation about National Parks and how we ensure these special places deliver for nature, people and climate.

ENDNOTES

¹https://stateofnature.org.uk/

- ² Mosedale JR., Maclean,IMD., Gardner AS, Gaston,KJ., Hopkins,JJ. 2022. A think piece on the effectiveness of protected areas in England. NECR412. Natural England
- ³ Under the globally recognised system adopted by the International Union for the Conservation of Nature (IUCN), the UK's National Parks are currently classified as Category V (Protected Landscapes) rather than Category II (National Park) on the basis that these are lived-in landscapes where there is an emphasis on the interaction between nature and people but their classification as Protected Areas is still dependent on them being managed and protected effectively for nature.
- ⁴ https://www.cbd.int/gbf
- ⁵ https://www.iucn.org/resources/factsheet/conserving-least-30-planet-2030-what-should-count
- ⁶ https://www.rewildingbritain.org.uk/press-hub/four-in-fivebritons-support-rewilding-poll-finds
- ⁷ https://www.hepplewilds.com/
- ⁸ Data on land ownership in National Parks based on information provided by Guy Shrubsole, April 2021.
- ⁹ Independent review of protected site management on Dartmoor – GOV.UK (www.gov.uk)
- ¹⁰ Missing in action: natural climate solutions in England's national parks | Policy and insight (friendsoftheearth.uk)
- ¹¹ https://www.woodlandtrust.org.uk/press-centre/2023/04/ snaizeholme-yorkshire-dales-native-woodland-natureboost/

- ¹² State of the water environment indicator B3: supporting evidence – GOV.UK (www.gov.uk)
- ¹³ JNCC Biodiversity Indicators, 2023. UKBI B7. Surface water status | JNCC – Adviser to Government on Nature Conservation
- ¹⁴ State of Our Rivers | The Rivers Trust
- ¹⁵ https://www.thefield.co.uk/country-house/whyare-nightingales-disappearing-from-the-britishcountryside-45570
- ¹⁶ https://www.wcl.org.uk/assets/uploads/0/Wildlife_Crime_ Report_October_2023.pdf
- ¹⁷ https://www.wcl.org.uk/assets/uploads/0/Wildlife_Crime_ Report_October_2023.pdf
- ¹⁸ https://www.wcl.org.uk/docs/assets/uploads/WCL_ Wildlife_Crime_Report_2021_29.11.22.pdf
- ¹⁹ This requirement is set out in Section 66 (1) of the Environment Act 1995 which says that each NPA should 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".
- ²⁰ https://www.yorkshiredales.org.uk/about/national-parkmanagement-plan/c-wildlife/
- ²¹ Landscapes Review (2019)



Campaign for National Parks are the only independent charity dedicated to securing the future of National Parks in England and Wales. Our independence from government means we can speak out when no-one else can. Our mission is clear: we're here to unite, inspire and empower everyone to take action and enjoy wilder National Parks.

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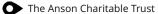
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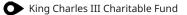


The British Ecological Society

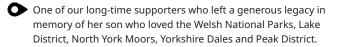
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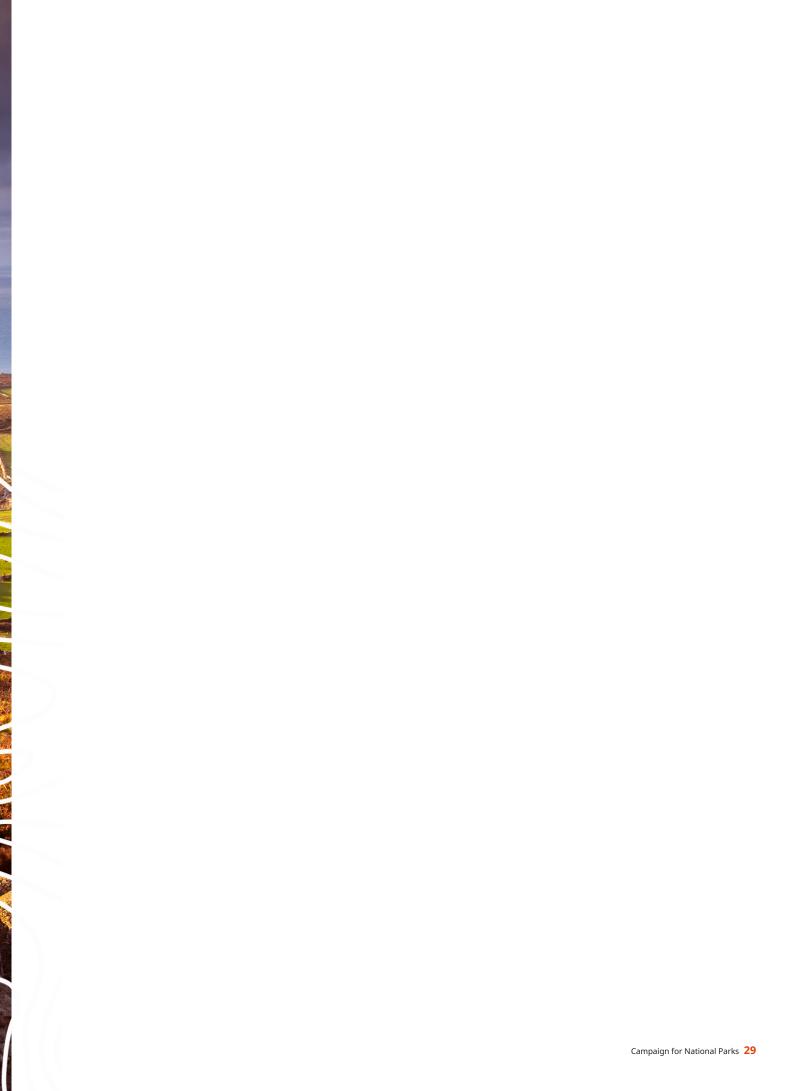
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