



IUCN National Committee UK's Protected Areas Working Group Response to consultation on the Government Response to the Landscapes Review

This response is submitted by the IUCN National Committee UK's Protected Areas Working Group (PAWG).

1. Background

IUCN is a membership Union composed of both government and civil society organisations, including the UK Government and many other organisations in the UK. It harnesses the global experience, resources and reach of its more than 1,400 member organisations and the input of more than 18,000 experts. This diversity and vast expertise makes IUCN the global authority on the status of the natural world and the measures needed to safeguard it. IUCN believes that protected and conserved areas are the foundation of biodiversity conservation. They safeguard nature and cultural resources, improve livelihoods and drive sustainable development.

The World Commission on Protected Areas (WCPA) is an IUCN Commission that comprises a global network of 2,500 experts from 140 countries that mobilises action in science, conservation, policy, and engagement to support well-managed and connected Protected Areas. It has been developing global standards for Protected Areas since it was first set up, then known as the Committee on National Parks, in 1946. It does this by publishing international guidelines for Protected Areas, including on management categories, governance types and management effectiveness.

The role of PAWG is to provide *independent strategic analysis and advice (set within the context of IUCN WCPA expertise and best practise)* in support of the UK Government's aspiration to protect 30% of the UK's land and 30% of its seas by 2030 (hereafter '30 by 30'), thus demonstrating leadership in this area of conservation policy and practice. We will support the UK Government and the devolved administrations in their application of the IUCN definitions and guidance on Protected Areas (PAs) and Other Effective area-based Conservation Measures (OECMs), and in the understanding and delivery of both quantitative and qualitative elements.

2. Context

This consultation comes at a critical time for nature in the UK and for the UK Government at the start of the UN Decade on Ecosystem Restoration and in the run up to the 15th Conference of the Parties to the Convention on Biological Diversity later in 2022.

Nature in the UK is in crisis. As the [State of Nature](#) report makes clear, around half of UK species are in decline and 15% are threatened with local extinction. Analysis of the [Biodiversity Intactness Index](#) (BII) by the Natural History Museum, in collaboration with the RSPB, has shown that UK is currently placed in the lowest 12% of global countries and territories for biodiversity intactness, comes bottom of the list for G7 countries and third from the bottom across all European countries in terms

of the amount of biodiversity it has retained. And with a BII of just 47%, England has the lowest BII in the UK.

At the same time, the pandemic has demonstrated just how much people need nature and access to it. For example, the [Why society needs nature: Lessons from research during Covid-19](#) report found that during the pandemic “74% of adults in England took more time to notice and engage with everyday nature (listening to birdsong, noticing butterflies)” and over 80% of adults in England across different population groups, and 83% of children, “reported that being in nature makes them very happy”. Similarly, YouGov polling commissioned by the RSPB and reported in its [Recovering Together](#) report found that “regardless of age, social class or income, adults in England overwhelmingly support protecting and investing in nature and increasing accessible natural greenspace as part of our recovery from Coronavirus”.

Effective Protected Areas (e.g. those with robust protection, effective management, appropriate governance, adequate financing etc.) are proven to be successful for safeguarding nature: they are the front line of defence against growing pressures from human activity and climate change and are vital for securing the future of some of our most important species and habitats, particularly when integrated into wider landscapes and seascapes that are also well managed for nature. These are the places where many of our most rare, vulnerable and most charismatic species have remained, within which they need to be protected, and from which they can be recovered and restored to the wider countryside.

The IUCN National Committee UK’s ‘Putting Nature on the Map’ project¹ considered the different types of Protected Area designations across the UK and assessed whether they each met the IUCN definition of a Protected Area, by considering key elements related to assessing their effective contribution to the protection of nature, such as their purpose(s), management objectives, legal basis and the longevity of assured protection. The project developed ‘Statements of Compliance’ (SoCs), which presented the outcomes of these assessments made by the IUCN WCPA UK Assessment Panel. These assessments did not, however, assess the management effectiveness of these designations.

In this analysis, the National Parks and Areas of Outstanding Natural Beauty (AONBs) (in England (for the purposes of this consultation)) were deemed to meet the IUCN definition of a Protected Area (though AONBs were considered to be on the ‘outer limit’ of what could be considered areas, but AONB managers at the time duly recognised the need that priority should be given to nature conservation) and were considered to best fit under IUCN Protected Area Management [Category V](#)² (Protected Landscape/Seascape). Whilst the report and the SoCs recognised and acknowledged the important contribution of these areas to nature protection and its delivery (amongst other things such as delivering ecosystem services), it also noted concerns around the true delivery of nature and its recovery across the entirety of these areas due to impacts in certain areas from development pressure and competing land uses, and where nature conservation does not necessarily always have priority in decisions – a complexity as a result of these areas being lived-in working landscapes. There is increasing awareness also of the critical need to improve management effectiveness within these Protected Areas.

¹ <https://iucnuk.wordpress.com/projects/putting-nature-on-the-map/>

² Category V Protected Areas: “A protected area where the interaction of people and nature over time has produced an area of distinct character with significant ecological, biological, cultural and scenic value: and where safeguarding the integrity of this interaction is vital to protecting and sustaining the area and its associated nature conservation and other values.” The primary objective of these areas should be “To protect and sustain important landscapes/seascapes and the associated nature conservation and other values created by interactions with humans through traditional management practices.”

In 2010, the UK Government joined other countries around the world in committing to the Aichi targets under the Convention on Biological Diversity, including Target 11 which required that, on land, *“By 2020, at least 17 per cent of terrestrial and inland water ... especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes”*.

The UK Government has included the National Parks and AONBs designated in England in its assessment of Protected Area coverage across the UK, e.g. in its international Protected Areas statistics reporting. The authors of the ‘Putting Nature on the Map’ project were concerned that although these Protected Landscapes were assessed to be meeting the IUCN definition of a Protected Area, they could be doing so much more to enhance the protection of nature within their jurisdiction as Protected Areas and that certain matters should be further considered and improved. The delivery of qualitative elements (e.g. effective management, connectivity, ecologically representativeness) of these areas could be improved significantly for example, as well as properly assessing which areas should and should not count quantitatively within these sites. Recent peer-reviewed research ([Starnes et al, 2021](#)) considers that by the 2020 deadline, only 11.4% of UK land was protected primarily for nature and as little as 4.9% is effectively protected. The authors also concluded that *“UK National Parks and Areas of Outstanding Natural Beauty may not currently meet the IUCN definition of ‘protected areas”*. These findings collectively indicate that there are some fundamentally important underlying issues that need to be addressed, and highlight both the scale of the efforts required if the UK Government is to meet its 30 by 30 commitment in general, and in particular, the necessity of building the credibility of the protection afforded by National Parks and AONBs and their role in truly contributing to this commitment.

3. Focus on Nature’s Recovery

England’s National Parks and AONBs have failed to buck the wider trends in nature’s decline, and as stated in the ‘Glover’ [Review of Protected Landscapes in England](#) (the Glover Review) *“the natural beauty which led to their protection in the first place is being lost”*. One of its headline recommendations was therefore that *“National landscapes should have a renewed mission to recover and enhance nature”*.

We therefore welcome the Government’s recognition in its response to the Glover review that many of these landscapes are now “badly degraded” and its focus on the need to ‘boost biodiversity’ in our Protected Landscapes³, with the proposed strengthening of the first purpose to place an emphasis on nature’s recovery, supporting stronger protections, management and monitoring.

4. Protected Landscapes and 30 by 30

We welcome the Government’s statement in their response to the Glover Review (and also reflected in the Government’s [Nature Recovery Green Paper](#)) that *“At present, under their current statutory purposes, level of protection and management, protected landscapes cannot be said to contribute towards 30 by 30 in their entirety”*. This statement aligns with concerns raised during the ‘Putting Nature of the Map’ process that Category V status could be undermined (e.g. that not all areas within Protected Landscapes may meet the IUCN Protected Area definition) and aligns with the considerations of Starnes *et al.* 2001, as outlined above. The condition of Sites of Special Scientific Interest (SSSIs) inside our Protected Landscapes is no better inside them than it is outside, and

³ By ‘Protected Landscapes’ we mean National Parks and Areas of Outstanding Natural Beauty

within their boundaries, species have declined and been lost as they have across the wide landscape (Mosedale, J.R. et al (2021))⁴. For example, when the Lake District became a National Park in 1951 it was home to water voles, corncrakes and black grouse - all now lost. This shows that much more needs to be done for nature within the boundaries of Protected Landscapes.

That said, Protected Landscapes provide the opportunity to deliver a huge (and when compared to the wider landscape a disproportionate) contribution towards ensuring that the best places for nature are properly protected. As stated in the Government's response to the Glover Review (based on Natural England data): *"Despite being less than one-quarter of land cover, protected landscapes are home to nearly half of all priority habitats in England, including 60% of deep peat, 34% of broadleaf woodland and nearly 88% of heather and acid grassland habitats"*. They also have a huge contribution to make to limiting the effects of, and helping wildlife and people adapt to, the impacts of climate change through the delivery of nature-based solutions, for example by storing carbon, reducing flood risk, improving water quality and improving the wellbeing of the nation. [Mapping of the overlap](#) between the areas of highest value for biodiversity and for carbon highlights the significant potential of many of these landscapes (for example the Chilterns, Pennines and North Yorkshire Moors), and [analysis](#) has shown that that if our peatlands are not restored, they will emit twice as much carbon as planned-for tree planting in the Committee on Climate Change's UK forestry targets aims to capture.

This huge ecological potential to contribute to nature's recovery in general (and to 30 by 30 in particular) is matched by the scale of ambition which has been shown by some of those who are responsible for these landscapes (e.g. the National Association for AONBs' [Colchester Declaration](#)) and demonstrated by the results of a number of ambitious and large scale projects which are driving nature's recovery on the ground within some of these landscapes (for example large scale peatland restoration being delivered across some of our upland National Parks and AONBs).

Below we outline the standards required for 30 by 30 in particular, and the wider reforms that will be required to support both the Protected Landscapes' contribution to 30 by 30 and their wider contribution to nature's recovery and for people.

5. Setting the standard for 30 by 30

It is crucial that the UK and devolved governments meet agreed international standards when assessing progress towards the 30 by 30 commitment. In this regard, both the anticipated wording of Target 3 under the [Global Biodiversity Framework](#) to be agreed at CBD CoP 15 later this year, and the IUCN's guidance on ['Conserving at least 30% of the Planet by 2030: What should count?'](#) are key to informing how our Protected Landscapes can make a more significant contribution.

The current draft of Target 3 under the Global Biodiversity Framework requires governments to: *"Ensure that at least 30 per cent globally of land areas and of sea areas, especially areas of particular importance for biodiversity and its contributions to people, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes"*.

This makes clear the importance of ensuring that the 30% includes the most important areas for biodiversity, and that they are both protected and effectively managed for nature.

⁴ Mosedale, J.R. et al (2021) *A think piece on the effectiveness of protected areas in England* (report provided to Natural England).

The IUCN guidance on 30 by 30 provides further clarity including that:

- *“All protected areas should have clear ecological objectives, be managed with nature conservation as the dominant priority, and be free of any environmentally damaging activities.*
- *“Countries must act and invest to ensure long-term and effective management of protected and conserved areas in accordance with their obligations as Parties to the CBD and other international agreements”; and*
- *“All protected areas and OECMs should set goals for conservation outcomes, monitor them and publicly report on their status”*

The [Making Space for Nature](#) Report (Lawton et al, 2010), commissioned by Defra, concluded that England's wildlife sites needed to be (in order of priority) “Better”, “Bigger”, “More” and “Joined” to deliver a resilient ecological network. Within our Protected Landscapes this will require a focus on:

- Addressing the condition of existing Protected Areas for nature through securing their effective management (better)
- Extending both protection and effective management to other areas of the highest current and potential value for biodiversity within their boundaries (bigger and more)
- Placing them at the core of the design of wider geographical areas for nature’s recovery (joined).

6. Prerequisites for contributing to 30 by 30 and driving nature’s wider recovery across Protected Landscapes

In order to facilitate an increased contribution to 30 by 30 in particular, and to drive nature’s recovery in general across England’s Protected Landscapes, PAWG recommends the following must be addressed by the UK Government in implementing its response to the Glover Review:

Purposes:

In addition to amending the purposes of Protected Landscapes to strengthen the first purpose to place an emphasis on nature’s recovery, PAWG believes it will be essential to put in place measures to ensure that the other purposes cannot be pursued in ways that serve to perpetuate or further drive declines in nature. In the case of AONBs not already governed by conservation boards, this will mean the addition of a second purpose to align purposes across all Protected Landscapes. Priority emphasis could be achieved either through careful wording of the purposes themselves, ensuring that other purposes are only pursued in so far as they further or are compatible with the nature recovery purpose, or through the development of a replacement for the Sandford Principle fit for securing nature’s recovery. That said, revision of the purposes alone will not be sufficient to ensure adequate protection and management of land within National Parks and AONBs, and so will need to be matched with changes and actions across duties, governance arrangements and resources.

Duties:

PAWG believes that the strengthened purpose for nature’s recovery must be accompanied by strengthened duties on all statutory bodies ‘to implement and to further’ (rather than to simply ‘have regard to’) that purpose. There must also be a clear requirement on public bodies (and other responsible bodies) to implement Protected Landscapes’ management plans.

Governance:

The Landscape Review noted that National Park Boards were “*lacking people who emphasise the purposes of securing nature and connecting people with our special places*” and a review of national appointments to National Park Boards indicates that expertise in conserving and enhancing wildlife (a core purpose) has been inadequate. To rectify this, appointments to Boards should reflect the governance skills and experience necessary to effectively manage the risks associated with the effective delivery of the first purpose and create a working culture that is conducive to high performance to this end. Board performance should be kept under independent review and members held accountable, with required expertise being secured through national appointments (as necessary). There should be on-going training to ensure Boards are fit for purpose in delivering management plans and the nature recovery objectives and targets embedded within them.

Turning to AONBs specifically, there is currently no standardised framework in place for their governance. This represents a significant risk to the delivery of, and consistent accountability to any targets with which they are associated.

Line of sight between strategic planning, operational delivery, corporate risk management, monitoring, reporting, and performance management is dependent on local circumstance and personal capabilities. This is compounded by little consistent data and evidence on impact evaluation and AONB partnerships (excepting conservation boards), having no authority and no corporate status. Where the AONB designation succeeds, this is due to personalities involved, not the current underlying structure.

PAWG believes that long-term **targets** should be set at the national level to reflect the contribution that Protected Landscapes are collectively required to make to the Government’s commitment to 30 by 30 both in terms of quantity (extent) and quality (e.g. effective management as demonstrated by monitoring of outcomes for nature and people) and to its other targets for nature’s recovery including the targets to halt and reverse the declines in the abundance of species. The targets set for Protected Landscapes’ contribution to 30 by 30 should reflect their role in nature’s recovery and the large proportion of the nation’s priority habitats that they contain. Importantly, only those areas within the Protected Landscape designations which meet the IUCN definition and are effectively managed for nature delivery should count towards the 30 by 30 target. These designations should be leading the way and showing what is possible for the rest of England through other mechanisms.

Landscape-level targets should also be based on what the science tells us will deliver the best results for biodiversity. For example [Cunningham et al. \(2021\)](#) found that that 41.5% of Protected Landscape 10x10 km cells are the highest priority for delivering 30 by 30 in a way that maximises biodiversity outcomes, and [Isaac et al \(2018\)](#) recommended expanding the area of high quality semi-natural habitat to cover 40% within National Parks and AONBs in England by 2042 (an increase of 33%) to enable these large areas to be foci for the development of resilient ecological networks.

These targets should be reflected in **management plans** which must include clearly defined actions and outcomes, and the adequacy of these management plans to achieve the desired outcomes must be subject to scrutiny. The IUCN’s framework for Protected Area Management Effectiveness provides excellent guidance in this areaⁱ.

PAWG also believes that **monitoring and reporting** against those management plans must be overseen by Natural England as the statutory advisor on both nature and Protected Landscapes.

Resources:

PAWG believes that the resources provided to Protected Landscapes must reflect the significant role that they have to play in contributing to the 30 by 30 target, to nature's wider recovery and to people. Central government funding should be realistically aligned to fully delivering the outcomes and targets set out in the management plans and funding commitments are needed for the long-term. In addition to the resources provided to National Parks and AONBs, consideration will also need to be given to ensure the provision of sufficient funding through agricultural support (under the Environmental Land Management Schemes) and other mechanisms to support a move away from environmentally-damaging activities within these Protected Landscape. Funding must also be available to secure the effective management of other Protected Area designations (for nature) within Protected Landscapes.

Specifically in relation to AONBs, the Landscapes Review recommended a doubling of funding to improve their delivery, which we support.

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ⁱ Hockings, M., Stolton, S., Leverington, F., Dudley, N. and Courrau, J. (2006). *Evaluating Effectiveness: A framework for assessing management effectiveness of protected areas*. 2nd edition. IUCN, Gland, Switzerland and Cambridge, UK. xiv + 105 pp