

IUCN National Committee UK Protected Areas Working Group response to the Land Use Framework Consultation April 2025

Introduction

The Protected Areas Working Group is one of the IUCN National Committee UK's expert working groups. The fundamental purpose of all expert working groups is to consider the global outputs of IUCN and its seven Commissions in the form of their principles, standards, guidance, strategies and tools, and apply them where applicable and appropriate, in the context of the UK and its Overseas Territories and Crown Dependencies.

The role of the Protected Areas Working Group (PAWG) is to provide independent strategic analysis and advice. PAWG seeks to influence the robust delivery of the commitment by governments across the UK to protect and manage effectively at least 30% of the UK's land and 30% of its seas by 2030 – benchmarked against IUCN standards and best practice, thus demonstrating leadership in this area of conservation policy and practice. It seeks to 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. It is in that capacity that we are submitting a response to question 10 of the Land Use Framework consultation.

Question 10. What changes are needed to accelerate 30by30 delivery, including by enabling Protected Landscapes to contribute more? Please provide any specific suggestions.

- **Strengthened Protected Landscapes legislation (around governance and regulations or duties on key actors) with a greater focus on nature**
- **Tools: such as greater alignment of existing Defra schemes with the 30by30 criteria**
- **Resources: such as funding or guidance for those managing Protected Landscapes for nature**
- **Other (please specify)**

We are particularly pleased that the Government remains committed to achieving Target 3¹ of the Global Biodiversity Framework to ensure and enable at least 30% of terrestrial, inland water and

¹ Target 3: *Ensure and enable that by 2030 at least 30 per cent of terrestrial, inland water, and of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.*

of coastal and marine areas are effectively conserved and managed. We are also supportive of the finalised criteria for 30by30 on land in England published by Defra in October 2024².

It is crucial that the UK meet agreed international standards when assessing progress towards the 30by30 commitment. For example, the IUCN's guidance on *Conserving at least 30% of the planet by 2030 – what should count?*³ and *Guidance on other effective area-based conservation measures (OECMs)*⁴ are key for informing how Protected Areas, Protected Landscapes and other areas can make a more significant contribution in a 30by30 context.

We welcome the language and ambition set out in the Land Use Framework consultation. However, the consultation focuses on land use change required to 2050 when many of the environmental targets – including 30by30 – need to be achieved before that date. PAWG is concerned that there is insufficient land use change envisaged by 2030. In addition, there appears to be a discrepancy in the evidence presented as to the baseline as to the amount of land that currently contributes to 30by30. The Analytical Annex states that the Government considers around 11% of land currently contributes whereas Defra's analysis from Oct 2024 suggested that this figure was just 7.1%⁵. If Defra has undertaken further analysis since Oct 2024, then it should be published at the earliest opportunity along with the delivery strategy that has been promised to ensure the Government can deliver on the 30by30 commitment.

The Government also needs to – as a matter of urgency – consider and set out how it intends to achieve Target 2 of the Global Biodiversity Framework which is to restore 30% of all degraded ecosystems⁶.

Statements of Compliance for UK Protected Areas and 'Other Effective area-based Conservation Measures'

In December 2023, PAWG published a report entitled *Statements of Compliance for UK protected areas and 'other effective conservation measures'*⁷. The work was subsequently published in the journal *PARKS: the international journal of protected areas and conservation* published by the World Commission on Protected Areas of IUCN. This independent, evidence-based assessment and technical report reviewed 23 designation types used across the UK (covering terrestrial and marine areas, important for biodiversity and landscape / seascape conservation) against the Global Biodiversity Framework and IUCN definitions of 'protected areas' and 'other effective area based conservation measures' (OECMs) in a 30by30 context. The aim of the work was to provide the independent assessment against the internationally agreed criteria and standards available at the time to enable stakeholders to understand the opportunities to improve the status of protection across the UK where there are specific gaps (e.g. in management effectiveness), and

² [Criteria for 30by30 on land in England - GOV.UK](#)

³ [Conserving at least 30% of the planet by 2030 – What should count? - resource | IUCN](#)

⁴ [Guidance on other effective area-based conservation measures \(OECMs\) - resource | IUCN](#)

⁵ [30by30 on land in England: confirmed criteria and next steps - GOV.UK](#)

⁶ [Target 2](#)

⁷ <https://iucn-nc.uk/wp-content/uploads/2023/12/Statements-of-Compliance-for-UK-protected-areas-and-%E2%80%99other-effective-area-based-conservation-measures-2023-Review-1.pdf>

to improve progress towards the 30by30 target and the associated reporting at domestic and international levels. For the 2023 report, PAWG restricted the analysis to information available through public sources (e.g. websites and published reports). The report concluded that, currently, only a subset of the UK's Protected Areas provide both the focus on – and bring with them the protections needed to meet – the 30by30 definition of a Protected Area. Even with this subset of designations – whilst meeting the criteria / requirements for protection and its long-term security, they will only be able to count (in line with the Global Biodiversity Framework and IUCN definitions) where they can demonstrate the delivery of their biodiversity outcomes.

Existing protected areas

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. However, there is no reference to improving existing Protected Areas, or expanding the network, within the Land Use Framework consultation. Considerable progress could be made towards the 30by30 target without needing additional land use change by improving the condition of our existing Protected Areas so those sites that are currently in poor condition are restored and can demonstrate that they are delivering biodiversity benefits.

PAWG has previously set out some of the key steps required to ensure the UK's Protected Area network(s) are fit for purpose⁸ including:

- An adequately resourced monitoring and assessment programme for sites (across all the different designations) is established throughout the UK, to inform and guide the management of the PAs, with annual reporting on progress against a legally binding PA target which grounds the UK Government's (including all the Devolved Administrations) global commitments into domestic delivery;
- Resources must also be urgently made available to improve the quality of existing PAs through their effective management and addressing off-site issues affecting their condition, including the need for adaptive management as a consequence of climate change;
- Recommendations from previous PA reviews for the UK Government and the Devolved Administrations need to be implemented, including for example, ensuring the current insufficiency of the UK Special Protection Area (SPA) network is addressed;
- Individual PAs should be reviewed, and appropriately extended, to better create an ecologically connected network. Such enlargements should include the designation of appropriate 'corridor' areas between sites to enhance the scope for species dispersion and strengthening their populations;

⁸ [Seeking UK protected areas that are fit for purpose... – IUCN National Committee UK](#)

- Reduce the pressures on wildlife by improving the wider environment, in both terrestrial and marine ecosystems, including through buffering wildlife sites.

PAWG has also previously made recommendations about the protection and management of Protected Areas in England for 30by30 which are still relevant including:

- ***The UK Government should focus on Protected Area Management Effectiveness (PAME) as a priority***

The success of Protected Areas as a tool for conservation is based on the effectiveness of the management to protect the values that they contain. PAWG believes that ineffective management and/or neglect are the most significant issues limiting the success of Protected Areas in England and the focus of the UK Government's efforts should be to ensure that management effectiveness, and its resourcing, is made a priority. We look forward to continuing conversations with Defra and its statutory agencies on how best to evaluate effectiveness and ensure the Protected Area network is performing as required if the UK Government's commitments are to be met.

- ***The UK Government should create additional Protected Areas where evidence and advice demonstrates qualification***

The IUCN has set out guidance on how to identify Protected Areas. PAWG believes it is imperative that the 30% of land protected encompasses areas of highest value for nature, including those not yet identified or protected. The Land Use Framework and Local Nature Recovery Strategies will have a fundamental role to play in supporting the identification of where new Protected Areas could be designated along with where habitat creation and restoration should be prioritised.

In the Defra consultation on environmental targets (June 2022), there was a commitment to the recovery of protected sites on land. It rightly recognised that improving their condition will be critical in order to meet the other legally-binding Environment Act targets. However, the Government failed to include a legally-binding terrestrial sites target to drive this improvement. At the time, the justification was that it would be premature to set a target because of the then Government's proposals to reform site protections as set out in the Nature Recovery Green Paper. However, four years on from the Nature Recovery Green Paper and three years on from the consultation on the Environment Act targets, there has been no reform of protected sites. There has been no demonstrable improvement in the condition of SSSIs for example.

There are non-legally binding interim targets in the Environmental Improvement Plan for all SSSIs to have an up-to-date condition assessment and for 50% of SSSIs to have 'actions on track' to achieve favourable condition by 2028. Natural England is tasked with delivering those interim targets and they set out a trajectory for how they expected to reach those targets by the 2028 deadline. However, in June 2024, Natural England's budget for the monitoring programme was cut and they subsequently revised down their trajectory. Without a legal driver, targets will always be vulnerable to funding decisions and this is likely to diminish the ability of government to meet its international obligations and meet the 30by30 target in a true sense. **PAWG is still of the view**

that there should be a legally binding target on the condition of terrestrial Protected Areas in England.

Protected Landscapes

In their peer-reviewed paper on the extent and effectiveness of Protected Areas in the UK, Starnes *et al* (2021)⁹ concluded that the UK's National Parks and Areas of Outstanding Natural Beauty may not currently meet the IUCN definition of 'protected areas' and goes further saying "*If the UK Government does not place greater priority on nature conservation in these areas, it calls into question whether they can legitimately be considered to contribute towards protected area coverage metrics against international targets*". In its *Statements of Compliance for UK protected areas and 'other effective conservation measures* report (Dec 2023), PAWG agreed with this assessment concluding that Protected Landscapes do not meet the Convention on Biological Diversity and IUCN definitions of Protected Areas for the purposes of 30by30 (except where underpinned by other Protected Areas that do meet those definitions).

The **Westminster Government has now acknowledged that Protected Landscapes cannot – in their entirety – count towards 30by30**. However, it is also recognised that (potentially) large areas within them have the potential to be improved for nature and to contribute towards the 30by30 international commitment and target. They could 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. This huge ecological potential to contribute to nature's recovery in general (and to 30by30 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. as set out in the National Association for AONBs' Colchester Declaration or National Park England's letter to the Defra Secretary of State, Oct 2024¹⁰) 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 upland National Parks and AONBs).

However, in order for more to be realised, **Protected Landscapes need a consistent and unified statutory purpose that requires them to actively deliver nature's recovery, underpinned by reformed governance**. PAWG welcomes the commitment made in Dec 2024 - on the 75th anniversary of the National Park and Access to the Countryside Act 1949 – to "*develop new legislation to empower our National Parks and National Landscapes*" and to strengthen their mandate to recover nature. There appears to have been little progress on this and/or engagement with stakeholders since the announcement. The statutory nature purpose and governance legislation need to be strengthened at the earliest opportunity.

In addition to amending the statutory purposes of Protected Landscapes, PAWG also believes it will be essential to put in place measures to ensure that the other statutory purposes cannot be pursued in ways that serve to perpetuate or further drive declines in nature. In the case of

⁹ [The extent and effectiveness of protected areas in the UK - ScienceDirect](#)

¹⁰ [COP16+letter+to+Defra+Secretary+of+State+-+10-10-24.pdf](#)

National Landscapes not already governed by conservation boards, this will mean the addition of a second statutory purpose to align statutory purposes across all types of Protected Landscape designation. 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 that is clear, ambitious and fit for securing nature's recovery, including for the 30by30 target.

There is a need for legislative change in order to reform governance to enable National Park Authorities to deliver these renewed purposes and 30by30. This includes reducing the size of Boards and limiting tenure to ensure they can function effectively, and requiring members to be appointed on the basis of having relevant skills and experience to deliver 30by30.

The Levelling Up and Regeneration Act 2023 introduced a **new duty on Public Authorities to 'seek to further' the existing purposes of Protected Landscapes** and it sets out expectations for their involvement in preparing and implementing Management Plans. These changes *could* lead to a step change in how nature's recovery is delivered within the Protected Landscapes. However, in the absence of guidance from Defra, there are already some worrying interpretations of the new duty. For example, a recent case at the High Court where the judge concluded that *"if the decision maker is satisfied that the proposed development will leave the natural beauty, wildlife and cultural heritage of the National Park unharmed, he or she may grant planning permission on the basis that he or she has thereby discharged the duty under section 11A(1A) of the 1949 Act to seek to further the statutory purpose under section 5(1)(a) of that Act"*. It is extremely concerning that "unharmed" can be interpreted as "seeking to further" the purposes. The baseline of the ecological value of the location for its existing wildlife, for instance, may also be low.

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 30by30 both in terms of quantity (extent) and quality (e.g. effective management in place and site / area in good condition, 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 30by30 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 30by30 target. These designations should also be leading the way and showing what is possible across other areas in England through other delivery mechanisms.

These targets should be reflected in management plans which must include clearly defined actions and objectives / outcomes, and the adequacy of these management plans (including financial and people resources) to achieve the desired outcomes must be subject to scrutiny. The

IUCN's *Evaluating effectiveness: a framework for assessing management effectiveness for protected areas* provides excellent guidance in this area¹¹.

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 National Landscapes, 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 Landscapes. Funding must also be available to secure the effective management of other Protected Area designations (for nature) within Protected Landscapes.

Concluding remarks

Finally, society will not secure nature's recovery by only focusing on the 30%. In order fully contribute to nature's recovery, other measures are needed that operate in parallel outside Protected Areas, Protected Landscapes and OECMs (e.g. policies, strategies, regulation, enforcement, better practice on the ground) and for all land and sea to be managed in a way that enables vast improvements in the ecological status of the wider landscape/seascape. The underpinning pressures having a negative impact on nature must be fully addressed. Clarifying how the full range of measures available will deliver nature's recovery should be an ambition for the Land Use Framework and the revised Environmental Improvement Plan. This is a great opportunity and IUCN National Committee UK Protected Areas Working Group is ready to help provide further advice on this.

Contact:

Katherine Hawkins, Co-Chair, Protected Areas Working Group (khawkins@wilidfetrusts.org)
Kate Jennings, Co-Chair, Protected Areas Working Group (kate.jennings@rspb.org.uk)

¹¹ [Evaluating effectiveness : a framework for assessing management effectiveness of protected areas - resource | IUCN](#)