



Rt Hon George Eustice MP  
Secretary of State for the Environment, Food & Rural Affairs  
Department for Environment, Food & Rural Affairs  
Seacole Building  
2 Marsham Street  
London SW1P 4DF

9 March 2021

Dear Secretary of State,

## **10 key changes to unlock the potential of England's protected landscapes for nature, climate and people**

In 2019 the [Glover Review](#) concluded that England's National Parks and Areas of Outstanding Natural Beauty (AONBs) are uniquely placed to drive nature's recovery, deliver nature-based solutions to the climate crisis and to connect people with nature. It also found that these protected landscapes are falling a long way short of their potential. Successive surveys have highlighted the public demand for them to play these roles<sup>1</sup> and the Review proposed the changes needed to achieve this.

Almost 18 months later, the government has yet to respond. In the meantime, nature has been offering hope and consolation to millions of us during the pandemic, whilst evidence shows that wildlife is continuing to [decline](#) and access to nature is [unequal](#).

We set out below the 10 key changes that would have the biggest impact in unlocking the potential of these landscapes to deliver for nature, climate and people. These are changes recommended by the Glover Review but we have built on them to show how they could be implemented to bring the greatest benefits. We stand ready to support the Government in further developing these reforms, for example we would be keen to join a small expert working group to take this forward.

Our 10 changes do not include designating new National Parks and AONBs. The findings of the Glover Review that these landscapes are not currently delivering for nature shows that, without reform, designating new ones will not help achieve the Government's [commitment](#) to protect 30% of land for nature by 2030. The focus must be on improving the landscapes we already have. Scientists have [concluded](#) that restoring and expanding habitats inside our existing landscapes will help deliver an ecological network.

The Review covered other areas but here we focus on the themes of nature, climate and people as there is great urgency and clear scope for protected landscapes to make a difference. In taking these reforms forward now, the Government would be showing strong global leadership ahead of the major international [biodiversity](#) and [climate](#) conferences this year.

The Glover Review was unequivocal about the imperative for England's protected landscapes to deliver for nature, climate and people, and clear on the steps needed to achieve that. Whether or not the Government rises to this challenge will be a key test of its commitment to delivering its [25 Year Environment Plan](#).

Yours sincerely,

**Rosie Hails, Director of Nature & Science, National Trust**  
**Jo Smith, Chief Executive, Derbyshire Wildlife Trust**  
**Beccy Speight, Chief Executive, RSPB**

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<sup>1</sup> For example, 'The [Big Conversation about National Parks](#)' (2016), the 'National Park National Awareness Survey' (2018) and the 2,500 responses to the Glover Review (2019).

## The 10 key changes

### **1. Give more priority to nature recovery and connecting people to nature in protected landscapes' statutory purposes**

Given their significant potential to tackle the nature and climate crises, the statutory purposes of National Parks and AONBs should be amended so that greater priority and urgency is given to protecting, recovering, and connecting all parts of society to, nature – and, in doing so, delivering nature-based solutions to climate change. The public appetite for this is clear but the Review shows that this is not currently being treated as a priority by enough landscapes. For example, it found that nature was only on the agenda at 3% of National Park Authority board meetings.

### **2. Reform governance so that landscapes are led by diverse people with the right expertise**

National Parks and AONBs should be led by smaller boards, made up of people reflecting all parts of society who are selected for their expertise in and passion for delivering on their purposes, including nature recovery, nature-based solutions to climate change and championing equal access. The Glover Review found that the current boards are “Lacking people who emphasise the purposes of securing nature and connecting people with our special places”.

Like several other changes, this will require legislation, but the Government could take a step in the right direction in its [appointments](#) to National Park and AONB Boards this year.

### **3. Bolster duties on organisations to deliver on protected landscapes' purposes and management plans**

The existing requirement in legislation for relevant authorities to have ‘regard’ to landscapes’ statutory purposes has proved ineffective and should be strengthened to one of ‘furthering’ their purposes. Relevant authorities should also be required to support the development and implementation of landscapes’ management plans.

National Parks and AONBs themselves should be required to implement, and publish reports on their progress in implementing, their management plans (not simply to prepare them). The legislation should also provide more clarity about what landscapes’ management plans should contain based on the recommendations of the Glover Review, including targets and actions for nature recovery against which their performance can be measured, and details of the monitoring that will be used to assess progress. At present, management plans often lack this content, making it difficult to secure action and to know whether the plan has been successful.

### **4. Establish a baseline for the current state of nature in protected landscapes and require landscapes to regularly monitor nature**

There is an urgent need to pull together and publish the existing information about the state of nature in protected landscapes at a national level, to act as a clear baseline for assessing future progress. This must also identify and make recommendations to fill the critical gaps in this database and identify the main threats to nature and factors driving biodiversity loss inside landscapes.

In addition, each National Park and AONB should be required and resourced to undertake and publish a detailed state of nature assessment of their landscape, following a standard methodology, every 5 years. This should inform their 5-year management plan and track their performance on targets and milestones.

## 5. Establish SMART nature recovery targets for protected landscapes and hold landscapes accountable for delivering them

The Government should establish a set of SMART<sup>2</sup> national targets for how National Parks and AONBs will be expected to deliver the [25 Year Environment Plan](#)'s ambitions to recover, and connect people with, nature, with 5-year milestones. This should include the two key targets recommended by [Isaac et al \(2018\)](#):

- Restoring 80% of SSSIs to favourable condition (these landscapes should aim higher than the 75% target applying to the whole of England). To track the recovery of unfavourable SSSIs, Natural England should urgently identify recovery milestones so that progress can be measured – this is especially important for the upland habitats that dominate many protected landscapes as these can take a long time to recover.
- Expanding the area of high quality semi-natural habitat to cover 40% of these landscapes, which scientists recommend is needed for them to contribute to a resilient ecological network.

SMART targets and milestones should also be set for species populations, both for priority species within these landscapes and for the overall abundance and diversity of species they support.

Progress should be monitored on an annual and 5-yearly basis and the results published.

In addition, National Parks and AONBs should be required to set, monitor and report on SMART targets and milestones for their landscape, reflecting how they will contribute to the national targets. These targets and milestones should be set in landscapes' management plans. They should feed into the monitoring and reporting on the national targets and milestones.

These targets may need to be revised to ensure they contribute to the delivery of targets set under the Environment Bill.

National Parks and AONBs should be robustly held accountable for their performance. This should include transparency in the reporting of progress so there is up to date, publicly accessible and clearly presented data on how each landscape, and all landscapes collectively, are performing across the targets and milestones.

Achieving these nature recovery targets would make a significant contribution to the fight against climate change – evidence shows that restoring and expanding habitats locks-up large amounts of carbon<sup>3</sup> – alongside other valuable ecosystem services such as reducing flood risk and improving water quality.

## 6. Support National Parks and AONBs to drive nature's recovery, deliver nature-based solutions to climate change and reach out to new communities

The Glover Review found that the boards and committees running England's National Parks and AONBs lack the expertise and passion to restore and connect people to nature and that they need reform. In the

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<sup>2</sup> **Specific** (target sets out clear and well-defined objectives - e.g., quantified percentages, precisely defined terms, etc.); **Measurable** (progress toward the target can be assessed using data already available or feasible to mobilise - e.g. quantitative indicators exist or are realistic to produce); **Ambitious** (target is stretching and aims sufficiently high to achieve the overall objective to recover nature); **Realistic** (target can feasibly be achieved considering the time frame, practicalities, plausible funding); and **Timebound** (target date is set with associated milestones as appropriate).

<sup>3</sup> R.H. Field, G.M. Buchanan, A. Hughes, P. Smith, R.B. Bradbury (2020), The value of habitats of conservation importance to climate change mitigation in the UK, *Biological Conservation*, Volume 248, <https://doi.org/10.1016/j.biocon.2020.108619> and RSPB (2020) [Repairing Nature's Carbon Store](#).



meantime, before that reform is achieved, there is an urgent need to provide mandatory training to board and committee members so that they have the knowledge to lead the landscape's delivery of these purposes. Natural England, working with partners, may be well-placed to deliver this.

There is also an important role for Natural England to provide more support to landscapes to assist their work on nature, especially with the development and implementation of management plans and state of nature monitoring.

## **7. Give protected landscapes the resources they need to deliver for nature, climate and people**

New funding is essential for all protected landscapes to turn nature recovery ambitions into reality, including to put in place greater staff capacity, carry out regular and robust monitoring and to lead and deliver large-scale projects.

Funding should be significantly increased for AONBs so that they can deliver on the commitments in their [Colchester Declaration for Nature Recovery](#). At present they are severely under-resourced to do this – the Glover Review found that while the 10 National Parks (covering 10% of England's land) received £48.7m, the 34 AONBs (covering 14% of England's land) received just £6.7m.

This increase in funding should not come at the expense of National Parks as increased funding is also needed for them to deliver much more for nature, climate and people. If new National Parks and AONBs are designated, this will require additional funding as they must not place further constraints on existing resources.

## **8. Protected landscapes should become exemplars for restoring, expanding, creating and connecting large areas of semi-natural habitat as part of the Nature Recovery Network**

In 2010 the [Lawton Report](#) concluded that protected landscapes had great potential to contribute to a "better, bigger, more and joined" ecological network in England but they were failing to deliver on that potential. The Glover Review reached the same conclusion almost a decade later. They should now become exemplars for delivering an ecological network and deploying nature-based solutions to climate change mitigation and adaptation on a large scale. Progress in each landscape should be reported annually and every 5 years.

## **9. Ensure protected landscapes can support the transition to the new Environmental Land Management Schemes (ELMS)**

National Parks and AONBs have the potential to be exemplars in nature-positive farming practices, demonstrating how farmed landscapes can form an integral part of a national ecological network, buffering areas which are managed primarily for nature. Protected landscapes must therefore play an important role in the transition to ELMS based on public money for public goods, clearly prioritising environmental public goods.

To do so they should be resourced to secure dedicated nature-friendly farming advice to:

- Work with farmers to create farm plans to identify opportunities for nature recovery and provide ongoing advice, support and feedback
- Provide support for accessing funding to deliver on-farm nature recovery
- Provide business advice to encourage lower intensity farming models, in line with [Clark and Scanlon \(2019\)](#)
- Support the marketing of and public access to nature-friendly farm produce



- Support the development of farmer networks to generate landscape-scale opportunities for nature restoration

The Glover Review found that where these advisors “are in place now, farmers often work well with them”.

## 10. Provide equal and sustainable access to protected landscapes for all

The Landscape Review set out what needs to happen to connect all parts of society to our protected landscapes, whilst ensuring that access does not adversely impact wildlife. For example, by building better links with schools, developing new long-term programmes to increase the ethnic diversity of visitors, working alongside the NHS to improve the nation’s health and becoming leaders in sustainable tourism. The Government’s response should commit to fully supporting the landscapes to deliver this, including by providing the necessary funding.

### What else needs to change?

These 10 key changes will make a difference but they will not be enough to reverse decades of biodiversity loss in these landscapes. We also need to see action from the Government on tackling the main forces driving wildlife declines inside protected landscapes, many of which are outside the control of National Park Authorities and AONB teams, including the burning of peatlands, intensive agriculture, water and air pollution, drainage, the illegal killing of protected wildlife, inappropriate forestry cover and the lack of native woodland.

In this context, we cannot understand why the Government’s recently announced [ban](#) on burning peatlands, which it accepts “is damaging to peatland formation and habitat condition”, only applies to Special Protection Areas and Special Areas of Conservation, leaving large areas of peat in protected landscapes unprotected. Only a few months ago the Prime Minister [claimed](#) that all our National Parks and AONBs are protected for nature’s recovery. This ban must be extended to cover all peat soils.

We also cannot hope to see nature recover in protected landscapes without a well-resourced and empowered regulator of the natural environment. Natural England has seen its budget cut by two-thirds over the past decade, leaving its Chair to [reflect](#) that its work in National Parks and AONBs “is cut now to pretty much nothing”. This body must be restored to full capacity to discharge its core statutory functions, especially its role in monitoring, protecting and restoring SSSIs, England’s most important places for nature, 63% of which are inside protected landscapes. This is crucial if we are to turn the corner on biodiversity loss inside and outside our protected landscapes.

The final, and crucial, change we need to see is more action by protected landscape bodies themselves. The Glover Review found that nature has not always been high on their list of priorities. The good news is that there are signs of change. For example the North Pennines AONB’s record of delivering [peatland restoration](#), the Broads National Park’s [Water, Mills and Marshes Partnership Scheme](#), Exmoor National Park’s [vision for nature recovery](#) and Nidderdale AONB’s [State of Nature 2020 Report](#). Making the changes set out in this letter above will give these landscapes the tools they need to go much further and faster, and to make a significant contribution to the delivery of the Government’s 25 Year Environment Plan.