

## **HRLN 16 - Evidence from: Campaign for National Parks**

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Senedd Cymru | Welsh Parliament

**Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee**

**Atal a gwrthdroi colli natur erbyn 2030 | Halting and reversing the loss of nature by 2030**

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### **1. Your views on the effectiveness of current policies / funds / statutory duties in halting and reversing the loss of nature by 2030.**

(We would be grateful if you could keep your answer to around 500 words).

Covering 20% of land in Wales and including large areas of our remaining resource of semi-natural habitat, National Parks have a critical role to play in ensuring that national climate and nature targets are met. However, strengthened purposes and duties are required if National Parks are to make a significant contribution to the 30x30 target as they are currently failing to deliver to their full potential.

The International Union for Conservation's (IUCN) Protected Areas Working Group (PAWG) published a 2023 report which makes it clear that National Park designation alone is not sufficient to qualify as a 30x30 Protected Area, but defined areas within them could qualify following case by case assessment. PAWG also stresses the need for improved purposes and duties to reflect the nature and climate crisis we are in:

“PAWG believes that the need for a strengthened purpose for nature's recovery in National Parks [in both England and Wales] must also 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 National Park management plans. In absence of these, PAWG does not believe the network can assure long-term conservation, except in areas that benefit from the provisions of other designations, e.g., SSSIs.”

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Welsh Government have not yet published their assessment of what will count towards 30x30 but the PAWC report is the latest in a growing body of evidence that the majority of land in Protected Landscapes does not currently meet the standard required for 30x30 and that significant changes are needed if more of these areas are to contribute.

In order to change this situation, the recommendations of the Biodiversity Deep Dive to “unlock the potential of designated landscapes” need to be expediated with a particular focus on ensuring that public bodies such water companies, the MOD and NRW align investment for nature recovery in National Parks and green financing of projects is supercharged. In England, new powers under the Levelling Up and Regeneration Act (2023) have recently come into force. 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 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.

In Wales, public bodies have a weaker ‘have regard’ duty that needs to be strengthened and aligned with the Environment (Wales) Act, 2016, to require greater prioritisation of investment and action. To date, the collaborative approach outlined by Welsh Government in ‘Valued and Resilient’ is not enough to drive the scale and pace of change needed. We would like to see a change from the current duty ‘have regard to’ into a duty ‘to further National Park purposes’.

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 Ministry of Defence should contribute towards peatland restoration where unexploded ordnance can add to the cost; NRW should be required to remove plantations to restore peatland habitats and to tackle issues with self-set conifers seeding from nearby plantations; and water regulators must ensure that water companies

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reduce pollution and comply with high standards across all National Park waterways.

## **2. Your views on the progress towards implementing the Biodiversity Deep Dive recommendations.**

(We would be grateful if you could keep your answer to around 500 words).

We welcome the 9 key recommendations made by the Deep Dive Designated Landscapes Working Group (listed below), but we remain concerned that the Biodiversity Deep Dive process becomes another talking shop without the appropriate resources applied to deliver upon the recommendations and action plans developed.

The various outcomes from the other groups are of course of vital interlocking importance and we are particularly keen to see closer alignment with the monitoring and evidence group as a monitoring framework is fundamental to improvements being made for nature in designated landscapes.

We are concerned that National Park Management Plans are being created without use of NRW's long-awaited update to Management Plan Guidance which is highlighted in point 2 as a key delivery tool for the BDD but is already long overdue. This could represent a big missed opportunity if the Pembrokeshire Coast National Park Authority do not embed the new ways of thinking in their new plan which is already being developed and should be delayed until the new guidance is implemented.

We also stress the importance of the group's 4th recommendation around an improved duty and also recommendation 8 which stresses the need for better farming representation in National Parks to deliver change. More recommendations will not bear results without appropriate commitment and funding being urgently applied.

Landscape working group recommendations:

1. Designated Landscapes should actively engage with, contribute to, and learn from global good practice in defining, planning and monitoring protected area management effectiveness.
  2. NRW's Updated Management Plan Guidance should provide a renewed focus and ambition and define the framework within which Deep Dive recommendations can be delivered.
  3. 'State of the Landscape Reports' should be explored as a mechanism to identify baselines, support objective setting, scenario plan, and target activity.
  4. The duty of regard is currently sub-optimal. The group recommends setting up a National Relevant Authorities Forum supported by an update of the current s62/s85 guidance in order to coordinate a more strategic response to exercising the duty
  5. Geographical Information System capability needs to be strengthened within Designated Landscapes, potentially through a collaborative programme and staff resource.
  6. The breadth and depth of collaboration by Designated Landscapes needs to be widened, with consideration of access, inclusion, equity and justice forming an integral element
  7. A Team Wales approach to shared governance, streamlined delivery, and risk management is essential if we are to tackle the technical challenges associated with consents, permitting, and grant funding.
  8. The development of the SFS provides an opportunity to integrate the purposes of Designated Landscapes with incentives for positive farming practice. Specialist advisors, embedded in Designated Landscapes but working in partnership
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through TCLW, would enable a more consistent approach to farmer and land manager engagement.

9. Further work is required to create a culture of respect, cooperation, and connection with Wales's natural environment, fostering a sense of stewardship and pro-environmental behaviour. Increased promotion of the Countryside Code, building on the new Countryside Code Strategy and Action Plan for Wales, and Welsh Government's Access Reform Programme have important roles to play here.

### **3. Your views on current arrangements for monitoring biodiversity.**

(We would be grateful if you could keep your answer to around 500 words).

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 our understanding of the state of nature in National Parks.

This is evidenced in our recent Health Check report which found that biodiversity and habitat data is incredibly patchy in National Parks with many relevant national datasets – on species abundance, water quality etc. – not being cut to National Park boundaries and a distinct lack of a shared monitoring approach in National Parks which has led to a disjointed and poor understanding of baseline biodiversity health which has in turn resulted in vague and unambitious Management Plans which fail to set clear targets and objectives. If National Parks are to contribute to national targets, baseline data needs improving.

To enable this, the national nature agencies must provide the right supporting framework including:

- Undertaking more frequent and improved condition assessments for SSSIs to ensure these areas are delivering the best outcomes for ecosystems – with focused

enforcement to ensure that the negative impacts of drainage, pollution, nutrient enrichment and moorland burning are reduced.

- Supplementing existing programmes of monitoring and habitat surveys, such as Environment and Rural Affairs Monitoring & Modelling Programme (ERAMMP) with additional samples in National Parks to ensure that there is sufficient data from within these areas.
  - Publishing regular monitoring data on species, habitats and water quality, and other relevant datasets including those relating to the coastal and marine environment, broken down by National Park. For example, NRW water data should be available to view by National Park.
  - Providing a monitoring framework to enable comparable data between National Parks, including methods to include the millions of local records with advice and support for citizen scientists to deliver improved species records for National Parks.
  - 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. These should align with National targets and the duties on public bodies to deliver them.
  - Publishing updated Management Plan guidance as a matter of urgency. This should set out what Management Plans should contain, provide access to evidence and provide guidance on how Plans will be assessed and reported.
  - Establishing a centre of excellence for integrating natural science with social and behavioural sciences, working closely with the Centre for National Parks and Protected Areas at the University of Cumbria and Cardiff University.
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- At the UK level, working with the Joint Nature Conservation Committee (JNCC) to create a knowledge sharing framework to share what works and publish comparable data of National Park nature condition across the devolved countries.

#### **4. Your views on new approaches needed to halt and reverse the loss of nature by 2030.**

(We would be grateful if you could keep your answer to around 500 words).

To ensure National Parks contribute to efforts to reverse the loss of nature, Welsh Government should double core funding of NPAs. Core NPA grants currently make 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” and should focus on delivery of outcomes prioritising nature recovery. This public funding underpins all opportunities for third sector funding, and private investment through nature and carbon markets. Funding commitments are needed long-term for the next decade and beyond.

Welsh Government must be unambiguous in their expectations and set out reforms to ensure that National Parks are deemed as nature designations. For example, Governments must make clear that all National Park water bodies are deemed high priority, with the landscape designation equivalent to bathing water and other Protected Areas designations.

There is a clear need for new legislation to emphasise and prioritise nature recovery in National Parks. New legislation is also needed 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 Wales, the State of Natural Resources Report, and Area Statements required under the Environment (Wales) Act, 2016, should feature National Parks as a

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priority. The new National Park in Wales must be designated with a clear purpose and mandate to drive nature recovery, with new legislation to ensure nature recovery across land, coast and sea, is prioritised as part of the designation criteria.

All priority habitats within National Parks outside of SSSIs (e.g. 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 before 2027. All consents and permits issued by NRW within the National Parks (e.g. 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.

A Climate Peatlands Fund should be established to fulfil the huge potential that National Park peatlands offer for carbon sequestration. Voluntary carbon markets are growing rapidly and, while the UK Peatland Code offers voluntary certification standards, the number of projects registered under the code remains relatively small. Welsh Government 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 long-term commitment to Government investment in peatlands.

## **5. Do you have any other points you wish to raise within the scope of this inquiry?**

(We would be grateful if you could keep your answer to around 500 words).

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. Welsh Government must significantly scale up incentives in National Parks with a focus on landscape-scale recovery and supporting farmers to adopt practices to enable nature recovery. Support should

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include much greater incentives for regenerative agriculture at multiple scales, including small scale horticulture. It should support the transition and adoption of appropriate grazing regimes, and practices such as paludiculture and agro-forestry, placing a greater emphasis on natural regeneration and maintenance and protection of existing priority habitats, as well as establishing and planting new habitats and targeted action for species recovery.

Designated Landscape bodies have a proven record of administering schemes and bringing stakeholders together. For example the Sustainable Management Scheme (SMS), the Sustainable Landscapes Sustainable Places (SLSP) fund and others, however these are often short-term or not aligned with agri-environment schemes. The Sustainable Farming Scheme holds an important key to the improvement of nature in National Parks and the optional and collaborative layers should reflect this with incentives for landscape-scale project delivery.