National Parks

HEALTH CHECK REPORT

NATURE RECOVERY

CAMPAIGN for NATIONAL PARKS

YMGYRCH y PARCIAU CENEDLAETHOL

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.

For further information: **www.cnp.org.uk**

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CampaignforNationalParks

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- One of our long-time supporters who left a generous legacy in memory of her son who loved the Welsh National Parks, Lake District, North York Moors, Yorkshire Dales and Peak District.

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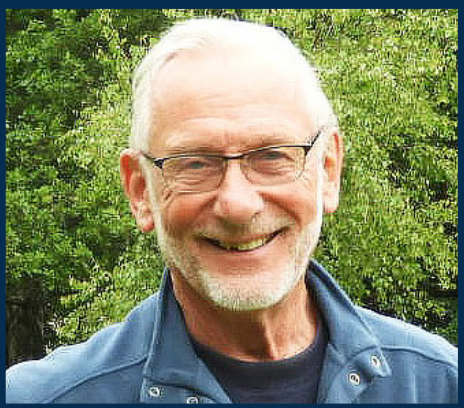
FOREWORD

"Having grown up in the New Forest and enjoyed so many amazing experiences in our National Parks I know how important these unique landscapes are for wildlife, habitats and the people who cherish them. But beneath the picturesque exterior things aren't looking quite so healthy. The sad truth is that the UK is one of the most nature-depleted countries in the world and National Parks need to be doing even more in the nature recovery fightback. Working together we can help create National Parks that are nature-rich and climate-resilient, and in doing so offer a brighter future for the planet and all those who call it home. And that's why Campaign for National Parks' suggested reforms in this report are so important. There are some clear steps which Government can take to help National Parks thrive, but we must act now."

Megan McCubbin *(Zoologist, Wildlife TV Presenter, Conservationist, Photographer and Author)*

"The National Parks of Wales hold a very special place in my heart. Having lived, worked and filmed amongst them for many years I have lost count of the endless hours spent tracking, admiring and promoting the special qualities and unique species present within them. From the rare Snowdon Lily in Eryri, to the choughs, puffins and stonechat of Pembrokeshire Coast, these treasured landscapes play host to a glorious array of diverse species. But despite their protected status, nature is still in crisis across our National Parks. One in six species is at risk of disappearing from Wales so we must do everything within our power to protect and enhance wild spaces for wildlife to thrive. Campaign for National Parks have clearly set out a programme for action and we must stand together to get Governments in Westminster and the Senedd to act."

Iolo Williams *(Naturalist, Wildlife TV Presenter, Writer & Conservationist)*



"The National Parks of England and Wales have the potential to play a key role in restoring nature, but currently only 6% of their area is managed effectively to these ends. I am therefore delighted to see the bold proposals set out here, to make more space for nature by restoring, re-creating, and joining up habitats for the benefit of people and the creatures that live in these beautiful areas. It won't be easy. They are working landscapes, home to people and to wildlife, but the report makes clear how it can be done. Its vision fills me with hope."

Professor Sir John Lawton CBE FRS

Image: Lucia Chmurova

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 loss[2]. 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 Landscapes[3].

As a signatory to the Convention on Biological Diversity (CBD) Kunming-Montreal Global Biodiversity Framework[4], 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 guidelines[5] 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 Britain[6] 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.*

*Total area of SSSI sites in National Parks considered to be in a favourable condition

CASE STUDY: Hepple Wilds[7] 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

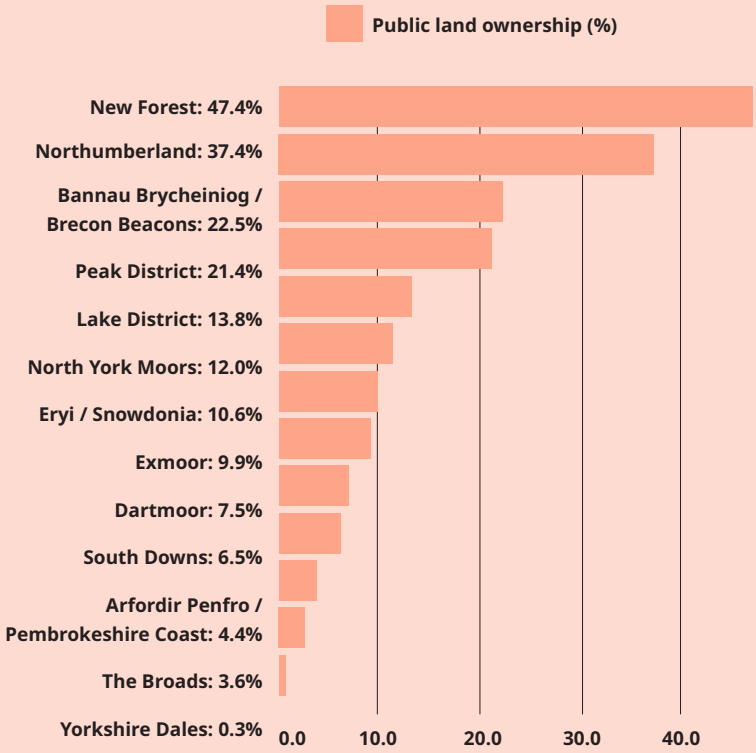


Image: **Horton in Ribblesdale by Laura Williams**

Image: **Peak District by Lauren Simmonds**

Image: **Peatland restoration in the Peak District by Moors for the Future/Graham Dunn**

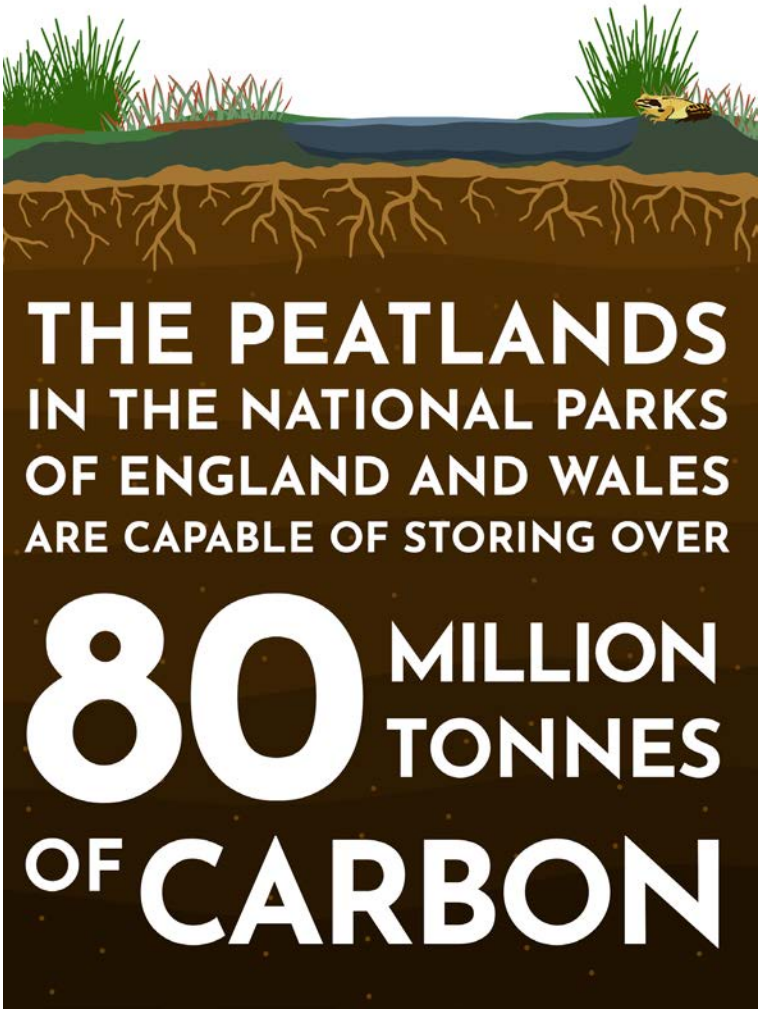
4. What is the current state of nature in National Parks?

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 healthy[9]). 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.



Peat accounts for ***43%*** *of the land area in the English National Parks and* ***8%*** *of the land area in the Welsh National Parks.*

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

Woodland health

Both the Westminster and Welsh Government have set ambitious targets for woodland expansion. Research[10] 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.

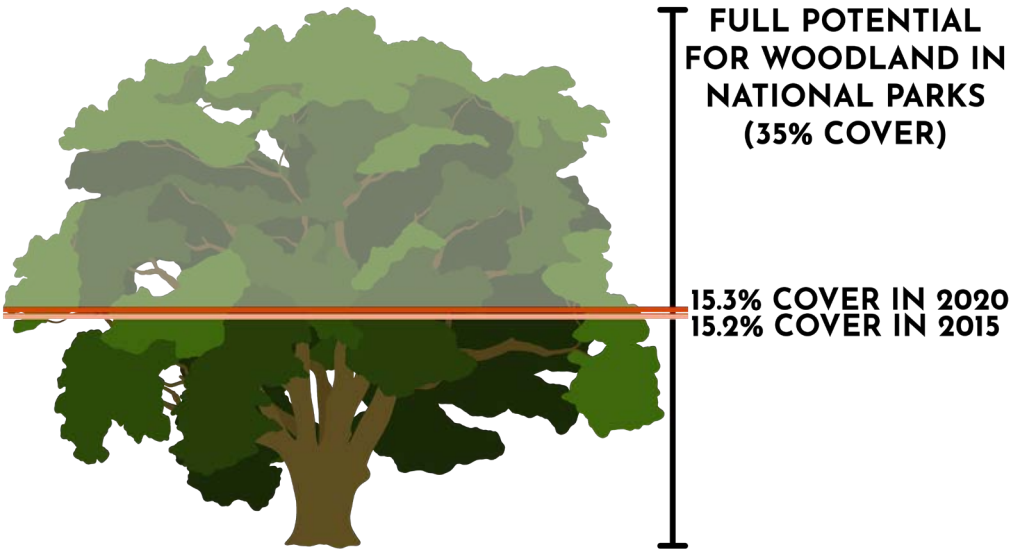


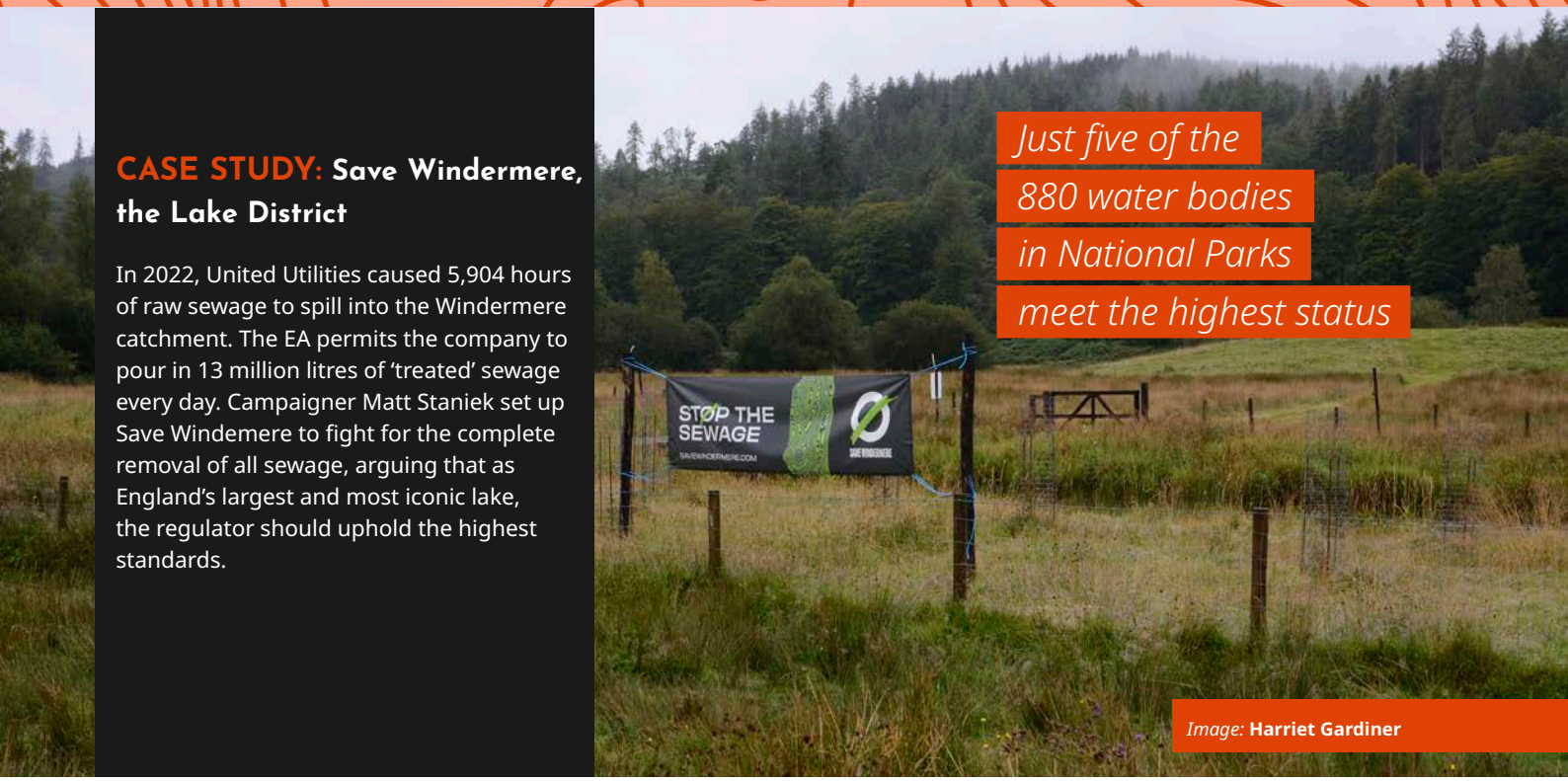
Image: **Snaizeholme, James Reader Front Row Films**

CASE STUDY: Snaizeholme[11] 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 Gardiner**

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% lakes[12]). 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 lakes[13]).

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 health[14].

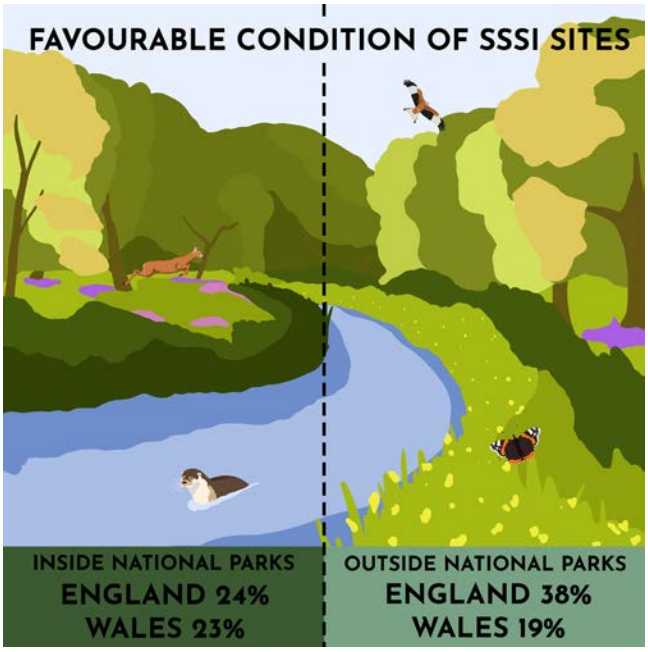
The health of water bodies in each National Park showed wide variation, largely a factor of geography and population, with upland National Parks typically faring better than lowland ones. Restoring rivers and lakes to health will require working beyond the National Park boundaries (as exemplified by 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 quarter 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.



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.

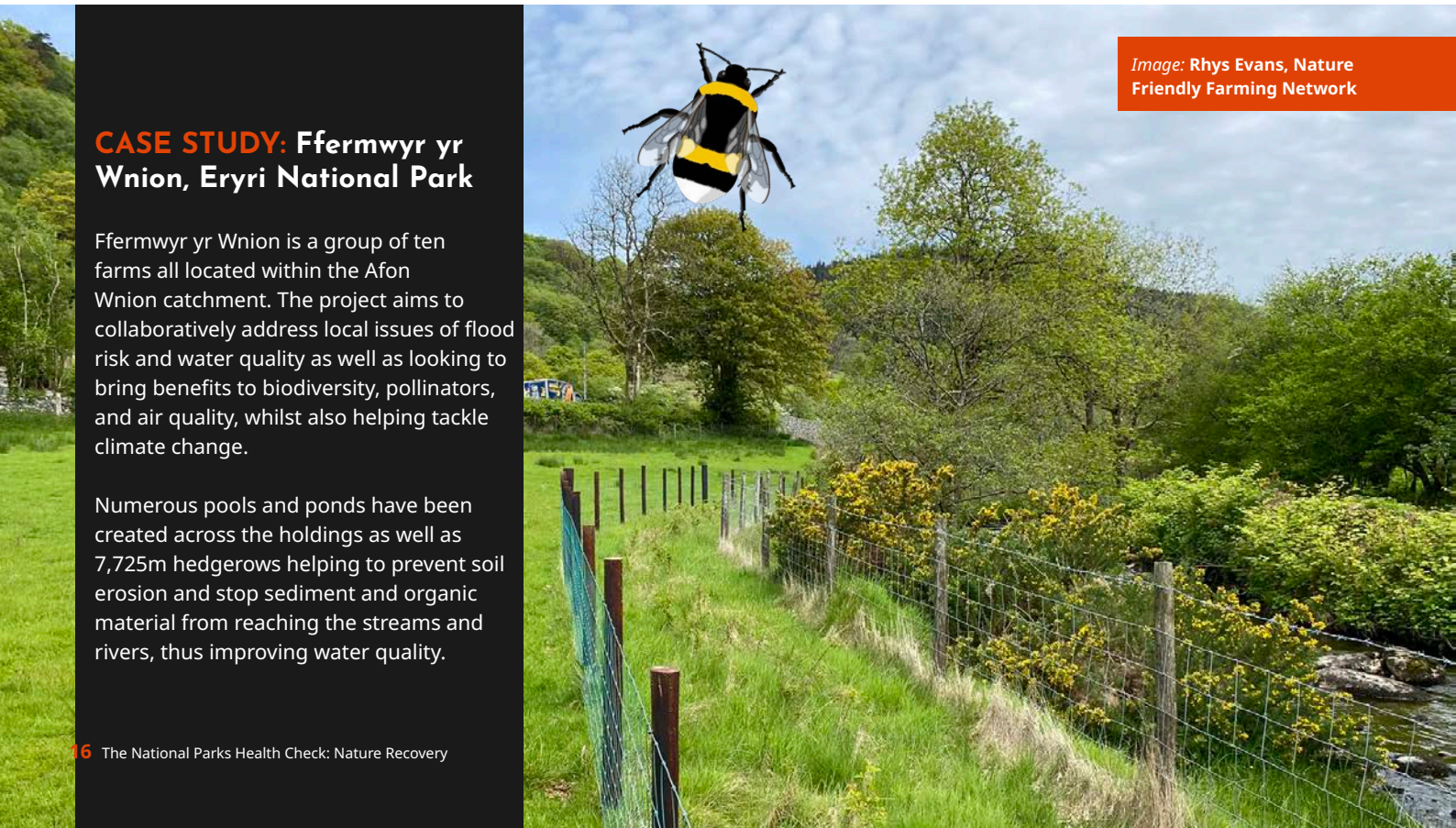


Image: **Rhys Evans, Nature Friendly Farming Network**

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.

Image: **Beaver Trust, Elliott McCandless**

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 km^2. 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 1995[15], 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 shooting[16]. 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 2022[17], and the most recent conviction in Wales was in 2012[18].

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 area[19]. 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 assessment[20] 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:

A 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.

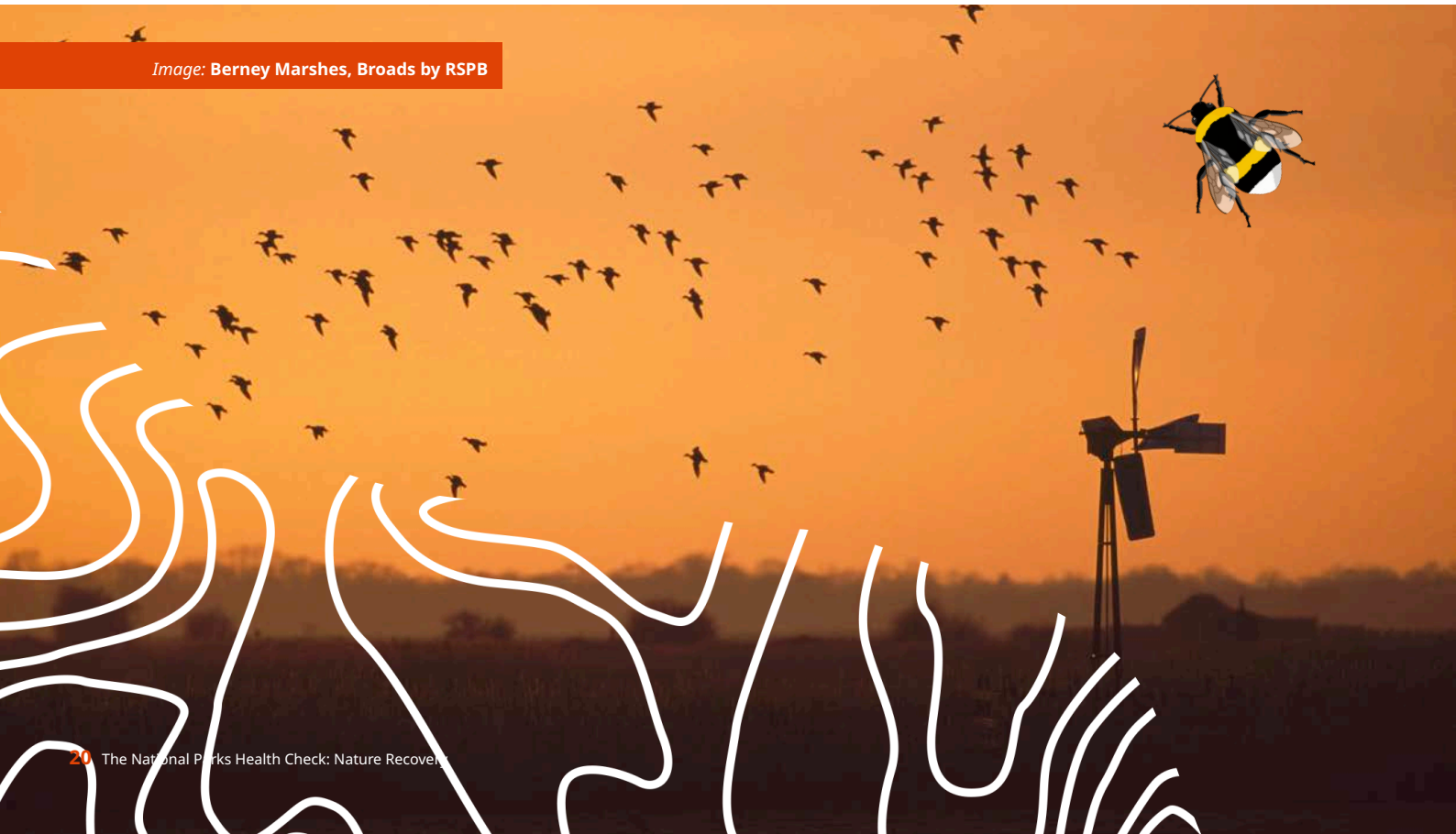


Image: **Berney Marshes, Broads by RSPB**

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.

Image: **Dawn Brown**

National 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, under- *and* 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**

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.

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 are 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.

Image: **Hilltop Farm, Yorkshire Dales by Harriet Gardiner**

The NPA core annual grant (£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 landscape-scale 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.

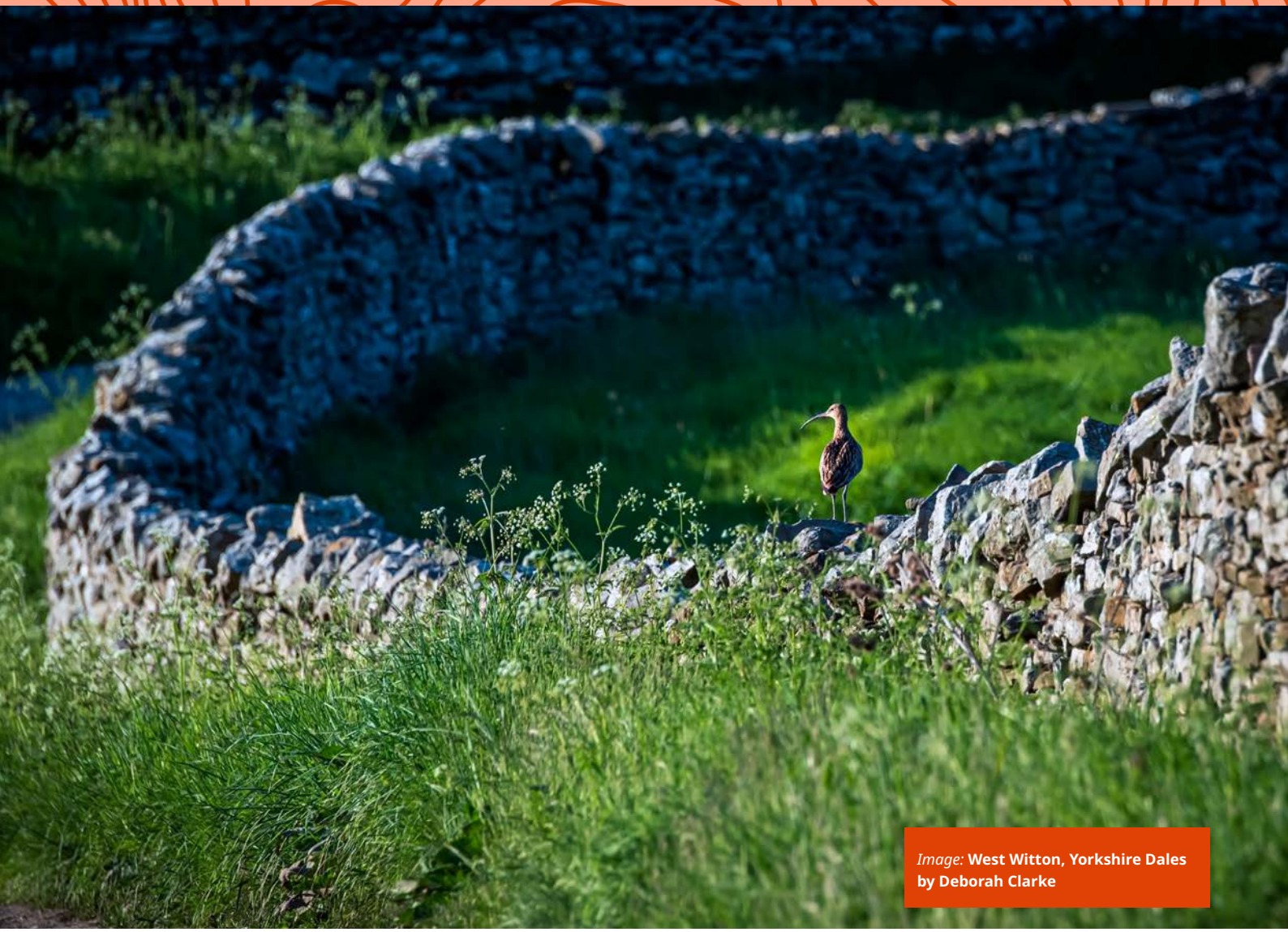


Image: **West Witton, Yorkshire Dales by Deborah Clarke**

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.

Image: **Bannau Brycheiniog**

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.

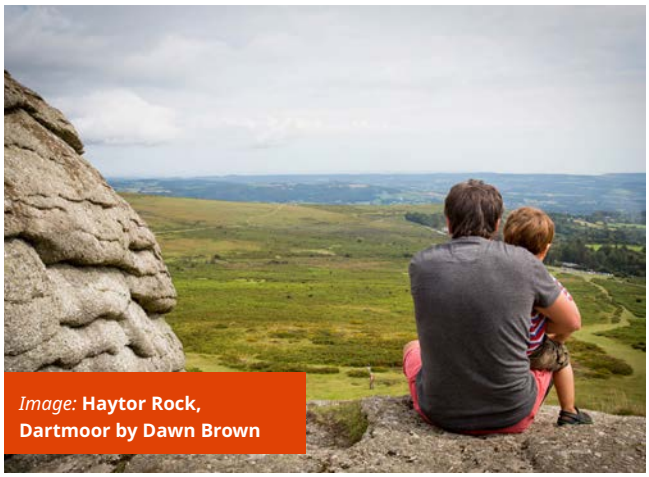


Image: **Haytor Rock, Dartmoor by Dawn Brown**

Image: **Cheriton Conservation Volunteer Group, South Downs**

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.

SECTION 1. INTRODUCTION

Image: **Thirlmere Reservoir, Lake District by Rod Hutchinson**

1.1 What is the Health Check?

The Health Check is our assessment of how well the National Parks[22] of England and Wales are delivering the objectives for which they were designated and other key priorities. The project will look at a range of objectives such as climate action, increasing access and diversity and supporting cultural heritage. However, our initial focus is on nature recovery, for reasons which we discuss in more detail in Section 2.

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).

We are very conscious that widescale reforms are needed across a broad range of policies and practices if we are to achieve the kind of systematic changes needed to reverse the decline in nature in the UK. This report should add to the growing body of evidence which supports the need for wider changes, but it does not attempt to try and cover all of these. We are also very aware that there is much that we could learn from what happens in other countries which take a different approach to land ownership and management in National Parks. However, our research focuses specifically on nature recovery in the National Parks of England and Wales in line with our charitable remit. Many of the points we raise may also apply to National Landscapes (Areas of Outstanding Natural Beauty (AONBs)) but we have not reviewed data for these areas.

The key aims of the research are to:

- Provide better evidence on the current situation with regard to nature recovery in National Parks.
- Demonstrate areas requiring improvement in order to secure greater progress on nature recovery.
- Identify the changes to policy, legislation and practice needed to deliver those improvements.
- Identify case studies of good practice that can be replicated elsewhere in the National Parks.
- Enable knowledge exchange between the National Parks.

As the research covers both England and Wales, we have been able to compare the situation in the two countries and to identify opportunities to share good practice and learning between them, as well as between the individual National Parks. While there are some common issues across all the Parks, there are also a number of differences in part due to the different policy and legislative frameworks in England and Wales. Where appropriate we have tailored our recommendations specifically to each country to take account of this.

1.2 How did we carry out the Health Check?

There were three main elements to the work that we undertook:

1. An analysis of data relating to the state of nature in National Parks.

2. A review of the nature recovery content in the National Park Management Plans.

3. Gathering information from National Park Authority (NPA) officers including through discussions in meetings and a series of questions sent by email.

Image: **Buttermere, Lake District by Stewart Prince**

1.3 Structure of the report

Section 2 explains the urgent need to focus on nature for this first phase of the Health Check.

Section 3 provides some details on land ownership and management in National Parks to set the context for our research.

Section 4 provides our assessment of the current state of nature in the National Parks. It sets out some of the challenges we faced in obtaining data, before going on to summarise the results of our analysis and the key issues we identified.

Section 5 looks at what is currently being done to support nature recovery in National Parks based on our review of the Management Plans and information from the NPAs. We summarise what our review identified about the targets and actions included in the Management Plans and consider whether these are sufficient to deliver the scale of change needed.

Section 6 discusses the reasons why so little progress is being made drawing on our discussions with NPA officers and other evidence gathered during the course of our research. We also discuss what needs to change in order for more progress to be made.

Section 7 sets out the four major reforms needed in order to secure nature recovery and identifies a quick win that we can all contribute towards.

Image: **Atlantic salmon by Kevin Wells**

Image: **Beachy Head, South Downs by Dawn Brown**

SECTION 2.
WHY PRIORITISE NATURE RECOVERY?

Image: **Broads by Justin Minns**

The nature and climate crisis is the biggest threat we have ever faced: globally, nationally and locally. *The State of Nature Report 2023*[23] highlights that the UK is one of the most nature-depleted countries on Earth and shows alarming and continuing declines in the state of our wildlife. There can be no doubt that there is now an urgent need to halt and reverse these declines. It is also clear that 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 (see text box). Sir John Lawton recognised this in his landmark report *Making Space for Nature*[24] in 2010 which concluded that Protected Landscapes "could be very important for enhancing the resilience of the network by providing large areas of high-quality wildlife habitat. Unfortunately, the evidence suggests that this is generally not what they currently do... but the potential for these areas is considerable." It also highlighted that around a quarter of the total area of National Parks is designated as Sites of Special Scientific Interest (SSSIs) and that the majority of these areas are "inadequately protected and often poorly managed" and their condition is "poorly known".

Since the Lawton report, there have been major reviews in both Wales (the Marsden Review published in 2015) and England (the Glover Review published in 2019) which recommended reforms to ensure National Parks are doing more to support nature recovery. But these reforms have not been implemented and the fundamental change required has not happened.

National Park purposes

National Parks are the finest landscapes which have been granted the highest level of protection. The statutory purposes of National Parks are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks.
- To promote opportunities for the public understanding and enjoyment of the special qualities of the National Parks.

In those cases where these two purposes are in conflict and reconciliation is impossible, the first purpose takes precedence.

The Broads Authority has a third purpose which is to protect the interests of navigation.

In pursuing these purposes, National Park Authorities (NPAs) also have a statutory duty to seek to foster the economic and social well-being of communities living within the National Park.

Sadly, the situation Lawton identified has only got worse in the 13 years since his report was published and his key recommendation for National Parks (see text box) remains as relevant today as it was then. Furthermore, it is essential that there is a strong emphasis on protecting and restoring nature in National Parks if these areas are to continue to justify international recognition as Protected Landscapes[25] and are to contribute effectively towards national and international efforts to halt the decline in biodiversity.

Extract from *Making Space for Nature*

"The evidence that protected landscapes provide biodiversity benefits over and above those delivered by SSSI or [Local Wildlife Site] designations outside these areas is mixed. Nonetheless these large areas undoubtedly provide an excellent base for delivering a more effective ecological network, not least because their legal standing, governance and management plans provide a basis for coordinated action to integrate effective ecological networks with landscape and other uses, including farming, education, recreation, tourism and the provision of other ecosystem services.

We believe that National Parks and AONBs should become exemplars of coherent and resilient ecological networks. This will require strong leadership and high levels of cooperation between landowners, public bodies, businesses and the voluntary sector.

Recommendation 14. In view of the opportunity presented by their existing statutory remits, in National Parks and AONBs:

(a) favourable condition of SSSIs should be achieved as quickly as possible;

(b) non-SSSI semi-natural habitat should be brought under management equivalent to SSSI standards; and

(c) other land should be managed so as to enhance connectivity."

2.1 It is vital for meeting national and international targets

As a signatory to the Convention on Biological Diversity (CBD) Kunming-Montreal Global Biodiversity Framework[26], 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. The IUCN (International Union for the Conservation of Nature) has set out clear guidelines[27] for what should count towards 30x30. These include that the area should be protected in the long-term for nature; that it should be protected against damaging activities such as pollution and habitat destruction; and that it should be effectively managed for nature, including regular monitoring, enforcement and investment to ensure nature in these areas is in good condition.

There are also now national targets for restoring certain habitats in both England and Wales. In Wales there is a target to increase woodland coverage to 20.7% of land area by 2050[28]. The equivalent target in England is 16.5% and was made legally binding through the Environment Act 2021 which also introduced statutory targets on species abundance in the form of a requirement to halt the decline in species populations by 2030, and then increase populations by at least 10% by 2042.

Covering 10% of land in England and 20% in Wales, and including large areas of our remaining resource of semi-natural habitat, the National Parks have a critical role to play in ensuring these national targets are met.

Covering 10% of land in England and 20% in Wales, and including large areas of our remaining resource of semi-natural habitat, the National Parks have a critical role to play in ensuring these national targets are met. They could also potentially make a significant contribution towards the 30x30 target, but only if they are being managed in line with the IUCN guidelines. The IUCN's Protected Areas Working Group (PAWG) has recently published a report[29] which makes it clear that National Park designation alone is not sufficient to qualify as a Protected Area but defined areas within them could qualify following case by case assessment and subject to evidence of effective management (see text box).

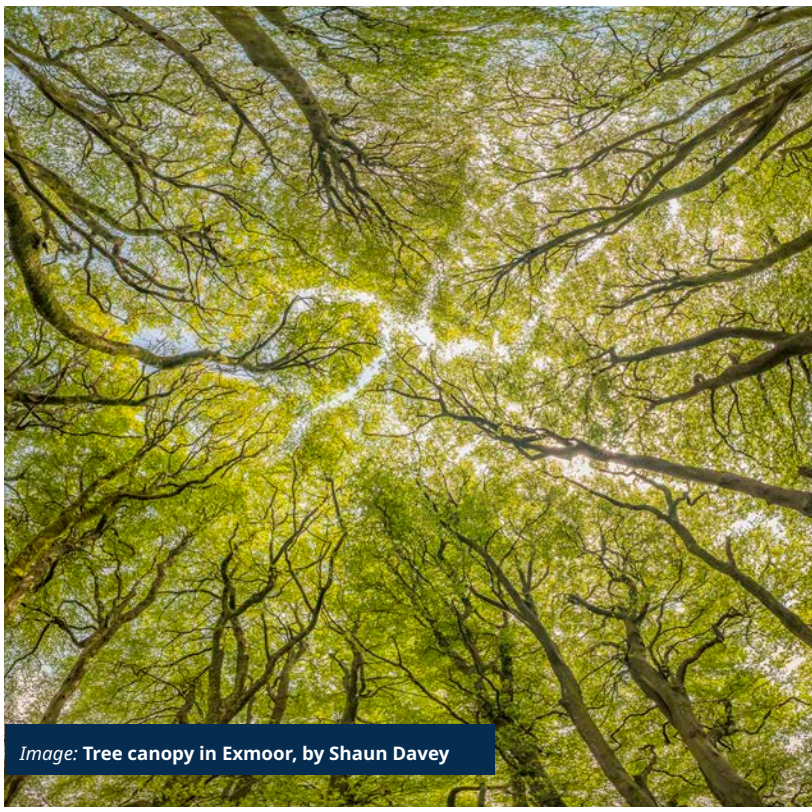


Image: **Tree canopy in Exmoor, by Shaun Davey**

Extract from IUCN Protected Areas Working Group Report

"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." (p. 59)

The PAWG 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. Research in 2022 by the British Ecological Society[30] identified that the proportion of land that is effectively protected for nature in UK territory is currently only around 5%. Wildlife and Countryside Link (WCL) has calculated that, with the right supporting framework in place, Protected Landscapes (which includes both National Parks and National Landscapes[31]) in England could contribute about 10% towards the overall target[32]. This is

based on an estimate that 40% of these areas have 30x30 potential as they consist of semi-natural or natural habitat. From our own assessment based on the data we have been able to obtain, currently only around 6% of the total land area of National Parks is favourably managed for nature when considering the total area of SSSI sites in National Parks assessed as being in 'favourable' condition[33]. Even the Westminster Government has recently acknowledged that Protected Landscapes cannot currently count towards 30x30 in their entirety[34] and that changes are needed to maximise the contribution they can make. The Welsh Government have not yet published their assessment of what will count towards 30x30.

From our own assessment based on the data we have been able to obtain, currently only around 6% of the total land area of National Parks is favourably managed for nature.

Other evidence of the need to reform National Parks to ensure they can deliver more for nature includes:

- A 2022 report by Natural England[35] which identified that making National Parks 'better' would be one of the most effective ways of improving the existing Protected Areas and slowing the loss of biodiversity.
- The recently published review of protected site management on Dartmoor[36]: which concluded that land in the National Park is not in a good state and that the way it is managed needs to change radically and urgently.

2.2 The public wants wilder National Parks

We've been calling for wilder National Parks for over 30 years (see text box). In that time, the idea of managing land in a way which allows natural processes to shape the landscape and habitats has grown in popularity among the public and there are now a growing number of examples of rewilding and nature-friendly farming initiatives being adopted in National Parks. Various public opinion surveys in recent years have shown that there is a strong desire among the general public for National Parks to be playing a far more effective role in nature recovery. Over 70 per cent of respondents to a Green Alliance survey carried out in August 2023[37] said that providing habitats for wildlife should be a priority for these areas. An earlier poll carried out by Rewilding Britain[38] found that 83% of the public support Britain's National Parks being made wilder, with areas set aside specifically for rewilding. The public also expect wildlife in National Parks to be faring better than in other areas. A 2022 survey by RSPB[39] found that 85% of respondents were concerned to learn that is not the case and 90% said it was important that the abundance of wildlife in National Parks and AONBs increased. This rose to 96% among people living in these areas. Importantly, 81% were supportive of doing things to achieve this that would change the way these landscapes look such as reducing the number of grazing animals and increasing the number of broadleaf trees.

83% of the public support Britain's National Parks being made wilder

90% said it was important that the abundance of wildlife in National Parks and AONBs increased.

CASE STUDY: Hepple Wilds[40]

The Hepple Estate consists of around 1600 hectares (6.25 square miles) of open moorland and fells in Northumberland National Park. After years of traditional conservation efforts which failed to buck the trend of national biodiversity decline, Hepple's owners introduced a 'managed wilding' plan in 2020. This includes pulsed organic grazing, tree and shrub planting, wetland creation, peatland restoration and the "smudging of hard edges" to create a more biodiverse landscape.

10km of internal fencing has been removed and a flock of Blackface sheep replaced by pedigree Longhorn cattle and Exmoor Ponies. Switching to an organic system has allowed them to continue farming the land, while also improving water quality and delivering a range of other environmental benefits. The Estate is now working with expert third parties, including Natural England, to monitor the impacts of all these changes.

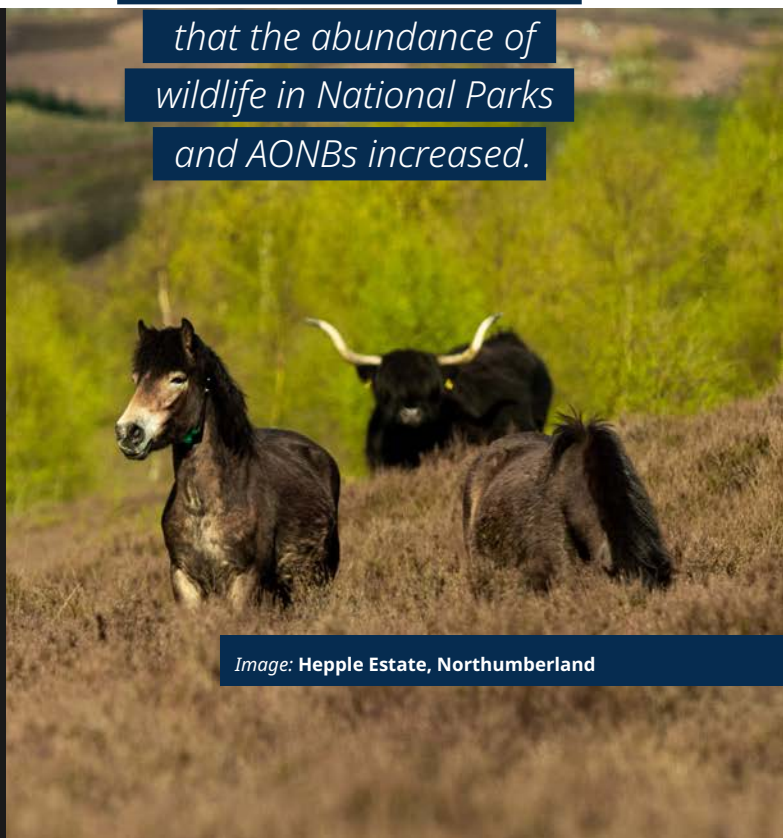


Image: **Hepple Estate, Northumberland**

There are now a growing number of examples of rewilding initiatives being adopted in National Parks, but there is potential for significantly more. Analysis by Rewilding Britain[41] has called for a requirement for 10% of the National Parks to be "core rewilding areas" and have identified that it would be possible to deliver this target in most cases "solely on land owned by the public sector and statutory undertakers, without requiring buy-in from private or third sector landowners".

Wild by Design and *Raising the Bar*

In the 1990s, Campaign for National Parks published *Wild by Design*[42] which was ahead of its time in calling for what we now know as rewilding. The report explored how wilder areas could be created within the Parks and considered a range of options for delivering this from small scale (less than a hectare) to large-scale schemes (thousands of hectares) and from non-intervention areas to areas used for low intensity agriculture, forestry or game production.

Three broad possibilities for making areas feel wilder are identified:

1. **Enhance existing habitats, for reducing over-grazing.**

2. **Re-create specific former natural and semi-natural habitats, such as broad-leaved woodland.**

3. **Allow new habitats to develop: known as "future natural", meaning accepting the species composition that establishes including the absence of species that may have existed before.**

Wild by Design concluded that: "Creative conservation and wilder area creation have a role to play in National Parks conservation strategies by reinforcing existing habitats through extending and interconnecting them. This will become increasingly important as factors such as [climate change] threaten to degrade relatively small and isolated sites. Smaller scale improvements within the matrix of the managed countryside are already happening. It would be great benefit to expand the existing mechanisms, allowing more ambitious projects to be undertaken".

In 2018, we published a report called *Raising the Bar: improving nature in our National Parks*[43] which called for a fundamental new approach to nature conservation in these areas and highlighted the need for urgent change to halt and reverse the loss of wildlife in our National Parks. It is extremely disappointing that more than half a decade later, and with a growing body of evidence about the urgent need for change, we are having to repeat many of the recommendations we made in *Raising the Bar*.

Image: **Valley of Rocks, Exmoor by Harriet Gardiner**

Image: **Dawn Brown**

It is clear we are a long way from meeting the 30% target and time is running out, 2030 is approaching rapidly and nature cannot wait. An increased emphasis on nature recovery in National Parks is essential, not only in terms of meeting our national and international obligations, but also because it is what the public expect from areas which were designated for the nation and receive funding from taxpayers in recognition of their role as important national assets. The rest of this report summarises what we discovered when we set out to identify how well National Parks are delivering on these expectations.

SECTION 3.
HOW IS THE LAND IN NATIONAL PARKS OWNED AND MANAGED?

Image: **Newgale, Pembrokeshire Coast**

3.1 Land ownership

While some NPAs own a small proportion of the land in their National Park (for example, Bannau Brycheiniog owns most at 13%, followed by Exmoor at 9%), the majority of land in National Parks is not owned by NPAs and several do not own any land at all. As Table 3.1 shows, many other organisations including Forestry England, the water companies, the Ministry of Defence and the National Trust own significantly more land in National Parks[44] than the NPAs do. For example, Forestry England owns nearly half (47%) of the New Forest while the NPA does not own any of it. More than a fifth of Northumberland (21.8%) is owned by the Ministry of Defence (MoD) and nearly 15% of the Peak District is owned by water companies.

However, as Figure 3.1 shows, the vast majority of land in most National Parks is privately owned. This ranges from just over half of the New Forest to more than 99% of the Yorkshire Dales, with the figure for most of the Parks being 90% or more. Many of the NPA officers we spoke to made reference to the difficulties of influencing what happens on private land as being one of the key factors limiting their ability to make more progress on nature recovery.

Table 3.1: Public and statutory undertakers Land ownership in National Parks

	New Forest	Northumberland	Bannau Brycheiniog / Brecon Beacons	Peak District	Lake District	North York Moors	Eryri / Snowdonia	Exmoor	Dartmoor	South Downs	Arfordir Penfro / Pembrokeshire Coast	Broads	Yorkshire Dales	Total ownership by public body*
Forestry Commission	47.0%	15.3%	4.3%	0.5%	4.1%	10.5%	9.8%	0.9%	1.6%	1.8%	0.3%	0.0%	0.0%	**6.0%**
MOD	0.0%	21.8%	0.0%	0.8%	0.2%	0.6%	0.0%	0.0%	1.9%	0.8%	4.1%	0.0%	0.3%	**1.9%**
NPA	0.0%	0.2%	13.4%	3.5%	3.1%	1.0%	0.0%	8.6%	1.5%	0.0%	0.0%	0.7%	0.0%	**2.4%**
Water companies	0.0%	0.0%	4.8%	14.8%	6.2%	0.0%	0.8%	0.4%	2.1%	0.0%	0.0%	0.1%	0.0%	**2.8%**
Councils	0.0%	0.0%	0.0%	1.7%	0.0%	0.0%	0.0%	0.0%	0.0%	3.9%	0.0%	1.6%	0.0%	**0.6%**
Natural England	0.4%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%	0.4%	0.1%	0.0%	1.1%	0.0%	**0.1%**
Total	**47.4%**	**37.4%**	**22.5%**	**21.4%**	**13.8%**	**12.0%**	**10.6%**	**9.9%**	**7.5%**	**6.5%**	**4.4%**	**3.6%**	**0.3%**	**13.7%**

Credit: Guy Shrubsole, Rewilding Britain, April 2021

*as a percentage of total all National Park Areas (ha)

3.2 Land cover

Table 3.2, which provides detail on the land cover, shows that nearly a quarter of the land in National Parks is classified as "improved grassland". This is defined as highly modified grassland that is dominated by a few species (such as rye grasses), may be regularly fertilised and is usually intensively managed for grazing animals or cutting hay. This is not significantly less than the average of around 30% of land across the whole of the UK. However, National Parks do contain a far higher proportion of semi-natural grassland which covers around a third of their area compared to just 5% across England and 23% across Wales. A significant proportion of semi-natural grasslands are used for agricultural purposes, such as grazing sheep. Plantlife highlighted[45] the benefits that semi-natural grasslands provide for biodiversity and the fact that it is one of the types of habitats that has seen the largest reductions in recent years, largely as a result of the intensification of farming and the conversion of species-rich meadows to improved grassland.

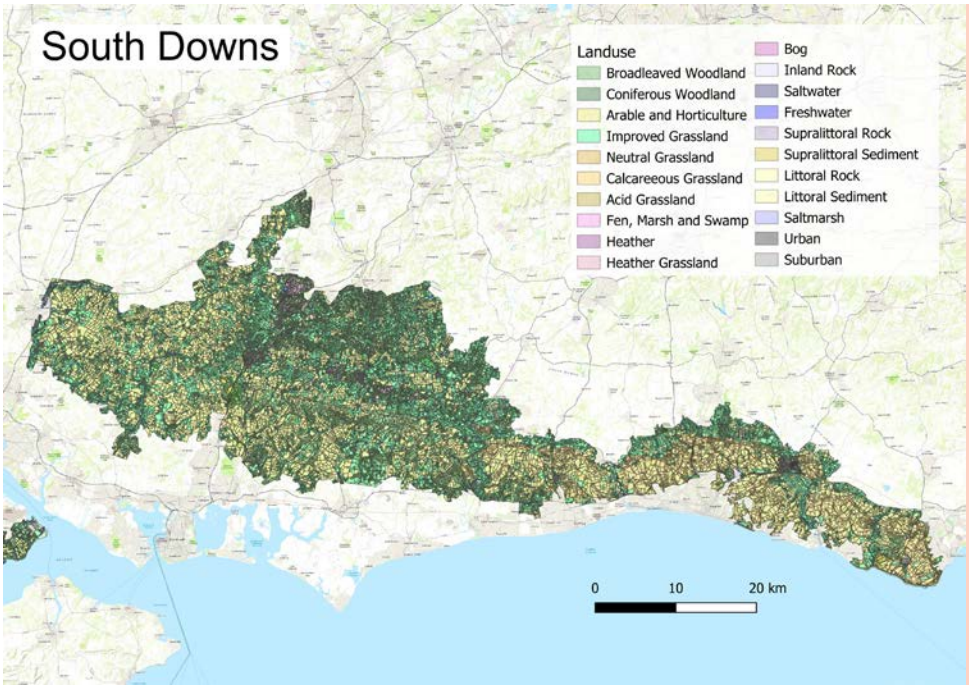
Other notable details from Table 3.2 include:

- Over 40% of the woodland in National Parks is coniferous which almost certainly means that it is commercial forestry plantations.
- A relatively small proportion of land is devoted to arable and horticultural use (less than 6% across all the Parks).
- Less than 2% of the Parks are made up of built-up areas classified as urban or suburban.

Table 3.2: Type of land cover by area and % of total area of the National Parks of England and Wales

Land Cover	class total	% of total E&W NP area
Broadleaved Woodland	152,152	9.10%
Coniferous Woodland	111,651	6.70%
Arable and Horticulture	97,145	5.80%
Improved Grassland	414,729	24.80%
Semi-natural Grassland	554,917	33.10%
Fen, Marsh and Swamp	8,111	0.50%
Heather	113,301	6.80%
Heather Grassland	64,710	3.90%
Bog	91,076	5.40%
Saltwater	1,389	0.10%
Freshwater	14,233	0.90%
Saltmarsh	2,851	0.20%
Urban	1,922	0.10%
Suburban	27,722	1.70%
Other	18,531	1.10%

Source: Based on Land Cover Map 2021 (land parcels, GB) – EIDC (ceh.ac.uk)



Land cover maps:

Arable and horticultural land represents only 5.8% of total land area in National Parks. The South Downs contains over half (55%) of the total quality of this class type by hectare. The South Downs is also the most urban, representing 24% of the total suburban/urban class types across all National Parks. NB: some categories have been combined in our table.

Click here for land cover maps for all the National Parks

3.3 Land management

Most land in National Parks in both England and Wales is farmed. It is hard to get comprehensive data on exactly how this land is managed but we have got some information from Welsh Government on the proportion of land in National Parks managed under the Glastir and Basic Payment Scheme (BPS) agri-environment schemes, as set out in Table 3.3. We have been unable to obtain the equivalent information for England.

Table 3.3 shows that National Parks contain around a fifth (18.1%) of the land eligible for the Glastir agri-environment scheme, but that only 16% of land in National Parks has been managed under Glastir compared to over 21% for the whole of Wales. Land in National Parks is even less likely to benefit from the BPS with only around 12% of land in National Parks in a BPS agreement compared to around 79% for the whole of Wales.

Supporting nature recovery is one of the four themes for which the Farming in Protected Landscapes (FiPL) element of the new Environmental Land Management (ELM) scheme in England is available[46].

There are a range of powers and mechanisms used to influence land management and FiPL is a rare example of one aimed specifically at land in National Parks.

Table 3.3: Land managed under agri-environment schemes in Wales

Protected Landscape Type	Total Area (Ha)	Total LPIS (Utilisable agricultureal area) ha	BPS Area (ha)	% claimed for BPS of total	% claimed for BPS of Agricultural Area	Glastir Area	% claimed for Glastir of total	% claimed for Glastir of Agricultural Area
National Landscape	128,355	8,049	7,209	5.62%	89.56%	7,310	5.70%	90.82%
National Parks	410,417	53,560	49,868	12.15%	93.11%	65,580	15.98%	122.44%
All LPIS	1,698,353	1,526,195	1,348,341	79.39%	88.35%	362,312	21.33%	23.74%

Source: Welsh Government

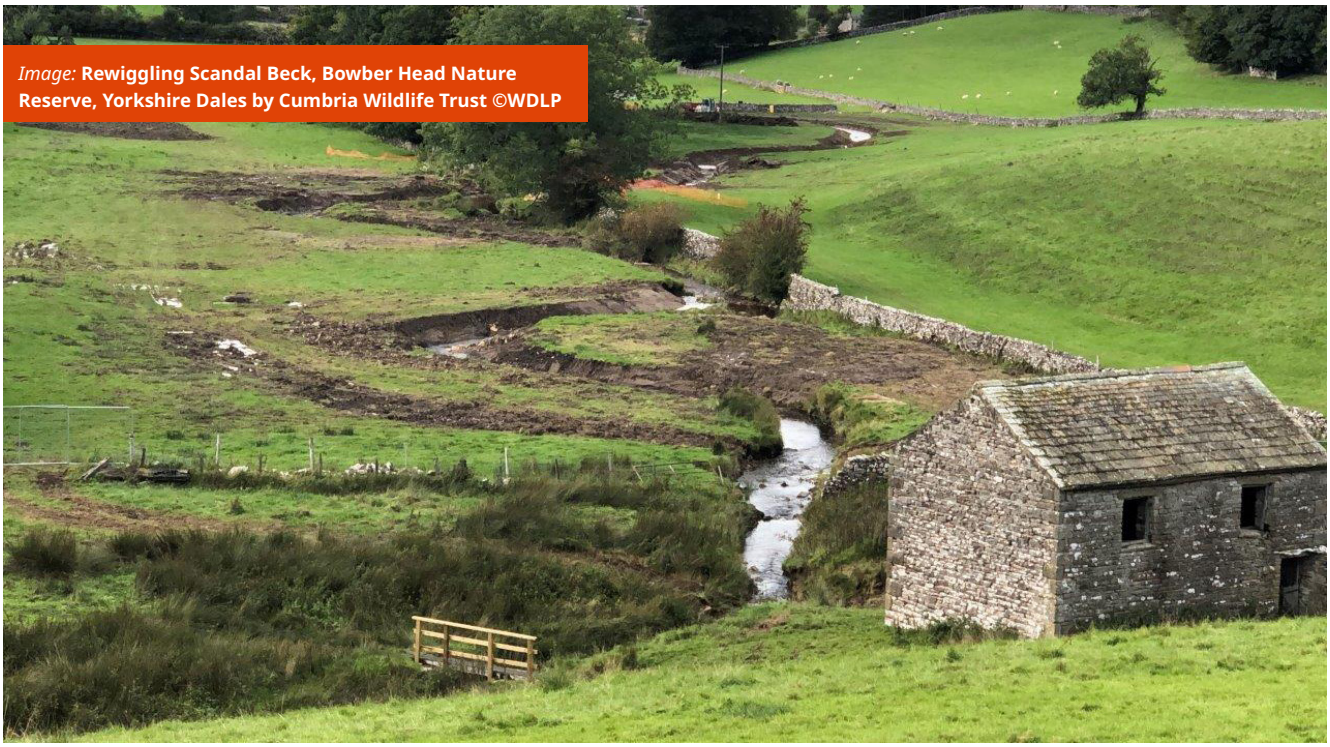


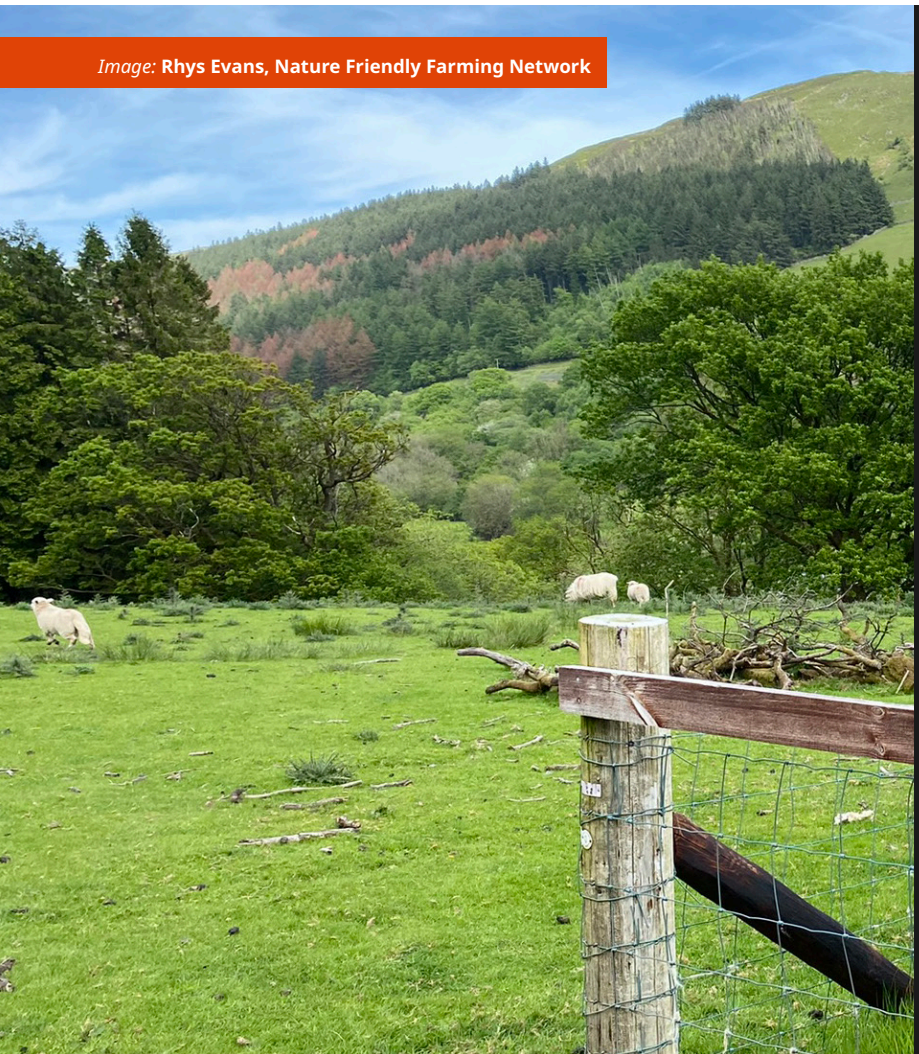
Image: **Rewiggling Scandal Beck, Bowber Head Nature Reserve, Yorkshire Dales by Cumbria Wildlife Trust ©WDLP**

CASE STUDY: Connecting the Coast, Pembrokeshire Coast National Park

Capital investment from Welsh Government has enabled Pembrokeshire Coast National Park to establish the Connecting the Coast scheme which offers funding for the creation and maintenance of wildlife habitats along Pembrokeshire's coastline such as the creation or management of flower-rich grasslands, sowing of herbal leys, trees and options to improve biodiversity in field margins.

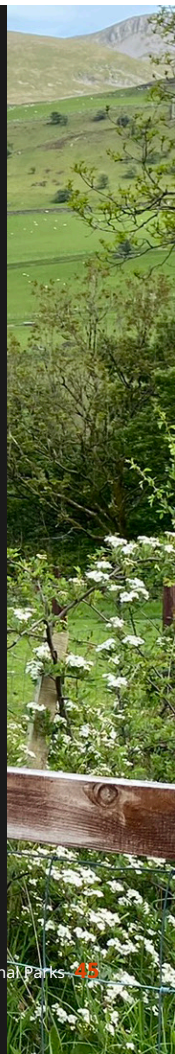
Image: **Pembrokeshire Coast**

Image: **Rhys Evans, Nature Friendly Farming Network**



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. Since 2020 around 7,725 metres of hedgerows were established across the 10 farms, equating to over 55,000 trees. Numerous pools and ponds have also been created across the holdings, helping to store floodwater whilst also acting as sediment traps, which again helps prevent flooding and improve water quality. Likewise, intact peatlands and hedgerows also help prevent soil erosion and stop sediment and organic material from reaching the streams and rivers, thus improving water quality.



SECTION 4.
WHAT IS THE CURRENT STATE OF NATURE IN NATIONAL PARKS?

Image: **Chrome Hill, Peak District by Kieran Metcalfe**

4.1 What did we assess?

Our intention was to gather as much data as possible on species, habitats and water quality in National Parks in order to assess the current state of nature in these areas and the extent to which it has improved or declined in recent years. It quickly became apparent that this would not be a straightforward task. Unfortunately, many relevant national datasets – on species abundance, water quality etc. – are not cut to National Park boundaries. The fact that neither the NPAs or other relevant bodies such as Natural England (NE) or Natural Resources Wales (NRW) were able to provide us with appropriate data has made this assessment far harder than it should have been and reflects poorly on the extent to which those organisations are making a serious effort to understand the changes needed to support nature recovery in National Parks.

One source of National Park specific data is that collected by NE as part of the 'Monitoring Environmental Outcomes in Protected Landscapes' (MEOPL) project and we are grateful to NE for sharing this with us. However, it only covered some of the topics we were interested in, and it was not always possible to obtain the equivalent datasets for Wales. In other cases, there was data available for Wales but not for England. Even where we have been able to get data, it is often several years out of date (usually from 2020). 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.

The only way we could secure a reasonable amount of National Park specific data for both England and Wales was to commission some additional analysis ourselves. We focused on a small number of key indicators and in general have prioritised topics for which data was readily available or could be obtained with a limited amount of additional analysis. This data cannot possibly tell the full story, but it does provide a good indication of the health of nature in our National Parks and strengthens the case for the scale of change that is so clearly needed.

Our analysis covered the following topics, each of which is addressed in more detail below:

- Peatland health
- Woodland health
- Freshwater health
- Protected Areas health – Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)
- Species health
- Bird crime

The level of detail we have been able to include on these different topics also varies significantly with there being good data on, for example, woodland coverage, but much less on other types of habitats. It proved particularly difficult to get any data to help us understand how the presence of species in National Parks has varied over time.

Neither the NPAs nor any of the relevant statutory bodies have yet put enough effort into providing data which allows for a proper understanding of the state of nature in Protected Landscapes.

As we discuss later in this report, the difficulty in getting suitable datasets cut to NPA boundaries is sometimes cited as a reason for not including more specific Management Plan targets in areas such as habitat improvement and species recovery. However, the fact that we have been able to obtain some of the relevant data at relatively little cost suggests that the NPAs could easily be doing more to address this issue themselves, especially as some have in-house GIS expertise. We are very disappointed that neither the NPAs nor any of the relevant statutory bodies have yet put enough effort into providing data which allows for a proper understanding of the state of nature in Protected Landscapes.

4.2 Peatland health

Peatlands are areas of land with a naturally accumulated layer of peat formed by waterlogging from a mix of partly decomposed plant materials over thousands of years. There are three main types of peatland in the UK:

- **Blanket bogs** – extensive areas where peat has accumulated to varying depths and 'blankets' the ground. These are usually found in the uplands, often in areas which have been used for livestock grazing for thousands of years and which in some cases are now used for grouse shooting.

- **Raised bogs** – discrete isolated areas of deep peat, often several metres higher than the surrounding landscape, found mainly in lowland areas which are now largely used for agriculture.

- **Fens** – areas of low, flat marshland or former marshland, found primarily in northwest Wales and the east of England.

Other important peatland habitats in the UK include the valley mires in the New Forest which contains 75% of the valley mires in north-western Europe.

Peatlands support important wildlife habitats and species including rare *Sphagnum* mosses, a range of bog specialist vascular plants, invertebrates such as the bog hoverfly and breeding bird species including the golden plover, dunlin and curlew. They also play a vital role in carbon storage. Undamaged bogs remove carbon dioxide from the atmosphere through photosynthesis in mosses and other peatland plants. Over time, carbon is stored in the peat which is composed of the dead, semi-decomposed plant remains. Healthy peatlands also reduce flood risk and provide high quality water that is much cheaper to treat for drinking due to reduced sediment load and better water colour. However, many of these benefits are lost when peatlands are damaged.

The National Parks contain a high proportion of the total areas of peatland: in England around 38% and in Wales 40%. As Table 4.1 shows, across all the National Parks around a third of the land area is made up of peatlands of one type or another. The total amount of peatland in Wales is significantly lower than in England, accounting for only about 8% of the land area in the Welsh National Parks compared to nearly 43% in the English National Parks. But in both cases, this is significantly higher than the proportion nationally: peat is 11% of land cover in England and 4% in Wales. There are also significant variations between individual National Parks within each country, with over three-quarters of Northumberland covered in peat, compared to less than 1% of the South Downs.

Image: **Ockerton Court, Dartmoor by Harriet Gardiner**

Table 4.1: The percentage of peat in each of the National Parks

National Park	Peat as % of total area	Deep peat as % of total area	Carbon content (t)
Northumberland	76.9%	21.8%	2,206,125
Yorkshire Dales	65.7%	31.9%	4,904,028
Peak District	48.0%	21.5%	6,425,570
North York Moors	44.5%	4.1%	1,377,213
Lake District	40.8%	13.3%	9,494,200
Broads	39.7%	38.8%	20,809,727
Dartmoor	39.2%	20.1%	1,339,629
Exmoor	32.9%	6.7%	1,572,270
New Forest	23.8%	0.1%	88,840
Eryri / Snowdonia	12.3%		25,956,089
Bannau Brycheiniog / Brecon Beacons	4.8%		3,378,342
South Downs	0.9%	0.6%	3,351,579
Arfordir Penfro / Pembrokeshire Coast	0.2%		97,093
TOTALS	**34.3%**	**11.8%**	**81,000,705**
Total for NPs in England	42.8%	15.6%	
Total for NPs in Wales	8.0%		

Source: Natural Resources Wales & Natural England data portal.
Notes: Natural England's Peat assessment class system.
Deep peaty soils Areas covered with a majority of peat >40cm deep.
This data is unavailable in the same way in Wales and is therefore incomplete in this table.
Carbon content data taken from latest publicly available data England Peat Status GHG and C storage – data.gov.uk (2008) and Natural Resources Wales / Peatland Data Portal Map Layers (2022).

Areas covered with a majority of peat greater than 40cm in depth, known as deep peat, are especially important for carbon storage, but the extent of deep peat available varies significantly. For example, around 39% of the total area of The Broads is covered in deep peat, compared to less than 1% in the New Forest and the South Downs. NRW were not able to provide us with details for the coverage of different types of peat in Wales.

The Climate Change Committee has identified peatland restoration as a priority for climate change mitigation as healthy peatlands have the potential to store and lock up large quantities of carbon. A comprehensive review by Natural England in 2021[47] found that peatlands hold the largest carbon stores of all habitats and are unique in that they can go on sequestering carbon indefinitely when in healthy condition. Our analysis found that the peatlands in the National Parks of England and Wales are capable of storing over 80 million tonnes of carbon[48], equivalent to the average yearly emissions of nearly 10 million UK households[49]. However, most of this potential is not currently being realised as damaged or degraded peatland is more likely to be emitting carbon than storing it. The majority of peatlands in England and Wales have been damaged by drainage, conversion to agriculture or forestry, burning, air pollution, over-grazing and peat extraction. As a result, they have become a large source of greenhouse gas emissions, releasing carbon which has been stored for centuries. The recent Dartmoor review[50] includes a University of Exeter estimate that just 1% of Dartmoor's deep peat area is healthy, peat-forming bog and identified rewetting the area's blanket bogs as "the absolute top priority". We agree that rewetting and restoring peatlands should be a top priority across all the National Parks to deliver benefits for both biodiversity and carbon storage.

Neither NE/NRW or the NPAs have been able to provide data specifically on the condition of peatlands across all the National Parks. However, a 2018 IUCN report[51] indicates 80% of peatlands in the UK were in damaged condition at that time. In 2019, the Welsh Government estimated that over 70% of Welsh peatlands were degraded[52] and the most recent State of Nature Report[53] states that 75% of peatlands in Great Britain are assessed to be not in good condition. In the absence of specific data, it is reasonable to assume that the majority of peatland habitats in National Parks are in poor condition.

Urgent action is needed to address this. It may take decades to restore the carbon sink function of some peatlands so this task must begin now. Such action should include giving much greater priority to the rewetting and restoration of all types of peatlands in our National Parks, alongside a stronger commitment to protecting existing areas of intact peatland including **a ban on all burning and afforestation on peatland, a requirement for Forestry England/ NRW to remove trees previously planted on peatland and restore these areas to good health by 2030 and an end to commercial peat extraction in National Parks, irrespective of peat depth. In those National Parks where the Ministry of Defence (MoD) has significant land holdings they should also be required to contribute towards the cost of peatland restoration, particularly as the need to deal with unexploded ordinance can add to the cost of such projects.**

Rewetting and restoring peatlands should be a top priority across all the National Parks to deliver benefits for both biodiversity and carbon storage.

Some of the NPAs are already involved in well-established and very successful landscape-scale peatland restoration programmes, such as the South West Peatland Partnership in Exmoor and Dartmoor (see text box). The vast majority of peatland in National Parks in both England and Wales is privately owned, so restoration can only happen with the agreement of the landowner. Therefore, NPAs and others leading restoration projects are heavily reliant on this kind of partnership working and community engagement both before and after delivery of practical restoration work. **This type of work can be resource intensive so there is a need for sustained funding for peatland restoration projects, particularly given the long timescales of many peatland recovery processes. There is a strong case for public funding for peatland restoration**[54]**.**

Image: **South West Peatland Partnership**

CASE STUDY: South West Peatland Partnership

The South West Peatland Partnership is a collaboration between local and regional public bodies, charities, landowners, commoners, contractors and farmers, working to restore over 2,500 hectares of degraded peatland across West Penwith, Bodmin Moor, Dartmoor and Exmoor by 2025.

In 2021, £9 million was awarded from Natural England's Nature for Climate Peatland Restoration Grant Scheme with match funding given by South West Water, Duchy of Cornwall, Environment Agency, the National Trust and Cornwall Council, and support in-kind coming from a number of other partners.

The interventions delivered include building wooden dams, peat bunding and the creation of wet woodlands where appropriate, the aim being to slow the flow of water from the landscape and improve the hydrological functioning of the peat. Whilst restoration is not a quick fix, works focussed on areas that have previously been drained and degraded help to prevent further degradation and erosion and promote active peat build up. Monitoring data for one gully shows that run-off reduced by approximately 66% post restoration.

Areas of once dry peatland are now blanketed in *Sphagnum* moss and pools of water which attract dragonflies and birdlife. Dunlin, a declining species, has been spotted nesting.

Click here to watch our film

4.3 Woodland health

Native, broadleaved trees and woodlands play a vital role in carbon storage as well as being essential for supporting a rich variety of other biodiversity. For example, a mature oak tree can support around 2,300 wildlife species. However, non-native trees generally support lower levels of biodiversity and plantations on peatlands can result in the loss of both biodiversity and carbon storage[55].

Inappropriate tree planting continues to be a major threat to nature in National Parks. The Edwards Review (1991) proposed a moratorium on "further major coniferous afforestation in National Parks". However, this was not implemented and the pressure to plant trees in the wrong places could increase under the Government's current tree planting targets. Plans to expand woodland must take full consideration of the need for 'the right tree in the right place for the right reason'. There are certain locations in National Parks where trees are not appropriate.

Both the Westminster and Welsh Government have set ambitious targets for woodland expansion. The Environment Act 2022 set a new legally binding target to increase tree and woodland coverage to 16.5% of the total land area of England by 2050 (from a 2022 baseline of 14.5%), although this is lower than the Climate Change Committee's recommended target of 17.5%[56]. The 2023 Environmental Improvement Plan[57] also introduced an interim target of a 0.26% increase by end of January 2028, in line with the trajectory needed to meet the long-term target. The equivalent target for Wales is 20.7% of land area by 2050[58]. The existence of these national targets means that there is good data available on changes in woodland coverage. However, we still had to commission additional analysis to be able to properly understand the changes taking place in National Parks in both England and Wales.

Changes in woodland coverage

Our analysis used data from the National Forest Inventory for 2015 and 2020 to assess the amount of woodland coverage in each of the National Parks and the extent to which it had changed during this period. As can be seen from Tables 4.2 and 4.3 below, there was virtually no change in the total amount of woodland coverage across all the Parks during this period with the total coverage being 15.3% in 2020 compared to 15.2% in 2015, a total increase of 2,104 hectares (about 8 square miles). The data for some Parks shows a small loss of woodland, but these decreases are so small that the total woodland coverage can be considered stable in these cases.

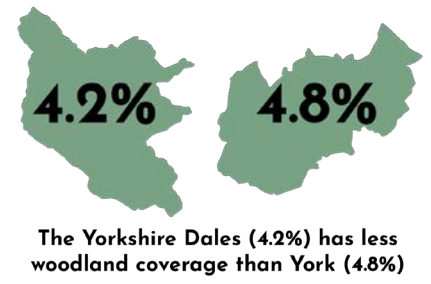
Table 4.2: Woodland coverage by area (Ha)

National Park	Woodland Coverage 2015	Woodland Coverage 2020	Difference 2020 – 2015
Lake District	29,758	30,204	447
Peak District	11,933	12,322	389
Yorkshire Dales	8,832	9,216	384
Northumberland	23,834	24,159	325
Bannau Brycheiniog / Brecon Beacons	20,578	20,768	191
North York Moors	31,962	32,060	98
Exmoor	9,461	9,547	86
Eryri / Snowdonia	39,332	39,405	74
Arfordir Penfro / Pembrokeshire Coast	5,332	5,385	53
Dartmoor	11,390	11,439	49
Broads	3,588	3,604	16
South Downs	37,390	37,388	-2
New Forest	20,879	20,874	-4
Total woodland coverage (ha)	**254,267**	**256,371**	
Total difference between 2020 and 2015 (ha)			**2,104**

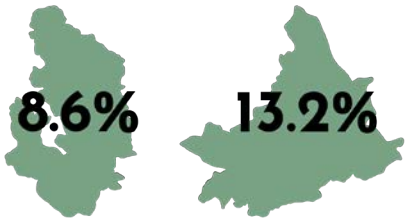
Source: Forestry Commission National Forest Inventory, Natural Resources Wales & Natural England Ancient Woodland. Analysed by Terra Sulis for CNP.

Notes: Woodland coverage includes all NFI woodland categories including conifer.

Table 4.3 shows that woodland coverage varies significantly between the Parks, from a low of 4.2% in the Yorkshire Dales to a high of 36.8% in the New Forest (both 2020 figures). Some variation is to be expected given differences in climate and topography, but there are significant variations even within the Northern Upland National Parks with, for example, Northumberland having 23% coverage in 2020. The contribution particular Parks made to the overall increase in woodland coverage also varies significantly with three of the National Parks (Yorkshire Dales, Peak District and Lake District) contributing the vast majority (68.3%) of the total increase in England's National Parks. In Wales, Bannau Brycheiniog is delivering significantly higher increases in woodland coverage than the other two National Parks, equating to approximately 60% of the total increase between 2015 to 2020. The Welsh Parks generally have higher levels of woodland coverage than the English ones. However, figures for overall coverage do not distinguish between different types of woodland. As Table 4.3 shows, in some of the National Parks with high levels of woodland coverage, a significant proportion of this woodland consists of conifers, which account for around 30% of all the woodland cover in the National Parks[59].



The Yorkshire Dales (4.2%) has less woodland coverage than York (4.8%)



The Peak District (8.6%) has less woodland coverage than Sheffield (13.2%)

Pembrokeshire Coast (8.8%) has less woodland coverage than Cardiff (11.2%)

Table 4.3: Woodland coverage as percentage of total area

National Park	2020 (% woodland coverage)	2020 (% conifer coverage)	Potential woodland coverage (from FoE research)
New Forest	36.8%	10.0%	46%
Northumberland	23.0%	10.0%	37%
South Downs	22.6%	3.8%	29%
North York Moors	22.2%	9.8%	41%
Eryri / Snowdonia	18.4%	7.0%	-
Bannau Brycheiniog / Brecon Beacons	15.4%	4.5%	-
Exmoor	13.8%	3.8%	51%
Lake District	12.8%	3.4%	30%
Broads	12.0%	0.3%	13%
Dartmoor	12.0%	3.0%	31%
Arfordir Penfro / Pembrokeshire Coast	8.8%	1.2%	-
Peak District	8.6%	2.4%	43%
Yorkshire Dales	4.2%	1.0%	28%
Total woodland coverage	**15.3% (England and Wales)**	**4.6% (England and Wales)**	**35% (England only)**

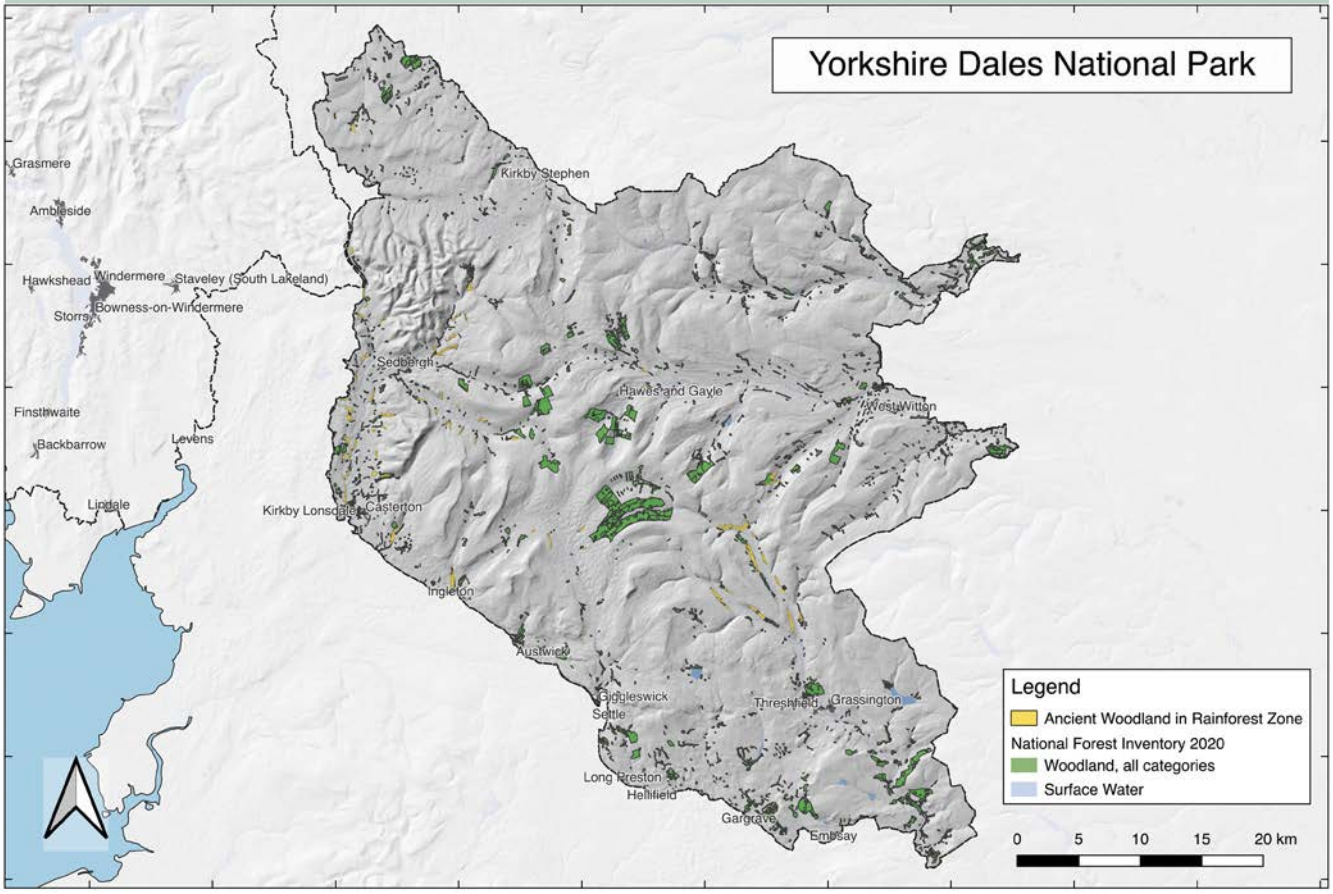
Infographic and table source: Forestry Commission National Forest Inventory, Natural Resources Wales & Natural England Ancient Woodland. Analysed by Terra Sulis for CNP.

Notes: Woodland coverage includes all NFI woodland categories including conifer. Conifer coverage includes NFI categories for conifer and mixed mainly conifer.

Woodland coverage maps:

The Yorkshire Dales has the lowest woodland coverage of all National Parks (4.2%) but a potential for up to 28% woodland coverage in the Park.

Click here for woodland coverage maps for all the National Parks.



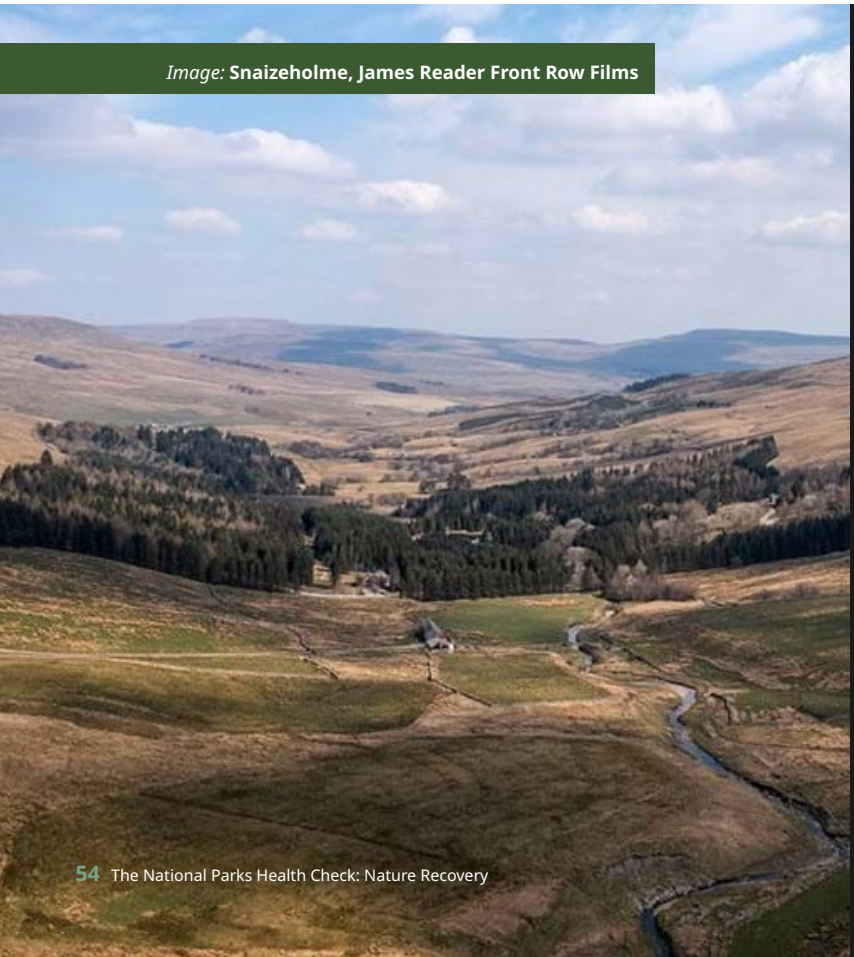


Image: **Snaizeholme, James Reader Front Row Films**

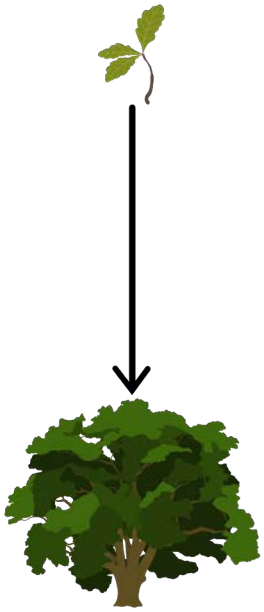
CASE STUDY: Snaizeholme[60]

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.

Different densities of trees are being planted across the site to create groves, glades and open woodlands that gently transition into and connect with these other habitats. The Trust will also be maintaining the dry-stone walls that criss-cross the valley, not only are these an important part of the landscape character but they are also a valuable habitat for small mammals and common lizards.

The Trust is now working with academics to assess the impacts of the restoration work, including investigating how trees can reduce flood risk, capture and store carbon and provide vital habitat for nature recovery across the uplands.

	ENGLAND	WALES
% woodland cover in National Parks (2020)	15.1%	16%
Increase since 2015	0.2%	0.1%
National target	16.5%	20.7%
Time for National Parks to reach National targets	35 Years	235 Years



Contribution to national targets

Data published by Forestry Research[61] shows that between 2015 and 2020 there was a total of approximately 7,230 hectares of new planting in England and 1,470 hectares in Wales. This means that the National Parks in England contributed significantly more than might be expected given their size, delivering nearly a quarter (24.8%) of the total increase in woodland coverage, despite covering only around 10% of the land area. The situation in Wales is slightly different. Here the National Parks cover around 20% of the land area and have contributed only slightly more than this (21.8%) to overall increases in woodland coverage. While these figures suggest National Parks (in England) are already making a significant contribution to national efforts to increase woodland coverage, an analysis of progress against national targets suggests far more needs to be done.

Woodland coverage across the English National Parks has increased from a total of 14.9% in 2015 to 15.1% in 2020, whilst in Wales it has increased from 15.9% for all the Parks to 16.0%. If these rates of progress continue, it will take another 35 years for National Parks in England collectively to reach the national target of 16.5% woodland coverage, meaning they won't have achieved this by the 2050 deadline. The situation in Wales is even worse. It would take 235 years for the Welsh National Parks collectively to meet the national target of 20.7%!

A significant step-change in progress is needed if National Parks are to deliver their share of national targets for woodland coverage. Arguably these areas should be contributing a significantly higher proportion of the total given that they were designated for wildlife and natural beauty. **Achieving this will require a greater focus on supporting natural regeneration, for example through the control of grazing, and the maintenance and protection of existing woodlands, as well as the planting of new trees.** Recently published research[62] has found significant potential for the natural regeneration of ancient oakwoods if grazing is controlled. There also needs to be more support for hedgerows, wood pasture, agro-forestry, and other opportunities for delivering trees outside woodlands, which also play an important role including by providing shelter and shade (something which will be increasingly important as the climate changes).

There is evidence to suggest it is possible to double the amount of woodland in National Parks without infringing on other important habitats and land uses. Research published by Friends of the Earth (FoE) in 2020[63] identified that it would be possible to increase total woodland cover in the English National Parks to almost 35%, without infringing on Priority Habitats, designated conservation areas, valuable farmland (Grades 1–3a), peatlands and Grade 4 land that is regularly used for growing crops. The FoE research also shows the potential for increased woodland coverage in each of the National Parks as set out in Table 4.3.

While there is limited potential in the Broads (due to its geography), there could be significant increases in woodland coverage in all the other English National Parks (the FoE research did not cover Wales). The biggest potential is often in those Parks which currently have very low levels of coverage. For example, the woodland cover on Exmoor could increase from 14% to 51% and that in the Peak District from 8% to 43%.

Temperate rainforest

National Parks provide significant opportunities for increasing the area of temperate rainforest, which "support around 500 species of lichen and over 160 species of mosses and liverworts."[64] This is of particular importance because the climatic conditions required to form rainforest are found on less than 1% of the earth's surface and the kind of temperate rainforest found in the UK, also known as Celtic or Atlantic rainforest, is now thought to be more threatened than tropical rainforest. Rainforest is generally found in areas with high rainfall and humidity and low variations in temperature. There are ideal conditions for it along much of the UK's western seaboard, including in North and West Wales, Cumbria and Devon – all areas containing National Parks.

As Table 4.4 shows, our analysis found that between 2% and 3% of the land area in the six National Parks within the relevant climatic zone – Bannau Brycheiniog, Dartmoor, Eryri, Exmoor, the Lake District and Pembrokeshire Coast – has potential for restoration as temperate rainforest. While this may seem small, collectively the National Parks include 38% of the total area in England and Wales with the potential to be temperate rainforest. This means that the relevant National Park Management Plans should include specific actions related to supporting temperate rainforest.

Table 4.4: Area of semi-natural and restored ancient woodland within the rainforest zone

National Park	Ancient woodland in rainforest zone (ha)	% by Park area
Eryri / Snowdonia	5,874.96	2.75%
Lake District	6,493.37	2.75%
Bannau Brycheiniog / Brecon Beacons	3,689.33	2.73%
Exmoor	1,892.08	2.73%
Arfordir Penfro / Pembrokeshire Coast	1,478.31	2.42%
Dartmoor	1,996.22	2.09%
Yorkshire Dales	505.44	0.23%
Peak District	21.79	0.02%

Source: Natural Resources Wales & Natural England Ancient Woodland, Lost Rainforest Campaign, Hygrothermy Map, derived from ancient woodland, Met Office and NBN Atlas data sets. NBN Trust (2022). The National Biodiversity Network (NBN) Atlas. https://ror.org/00mcxye41 Analysed by Terra Sulis for CNP.

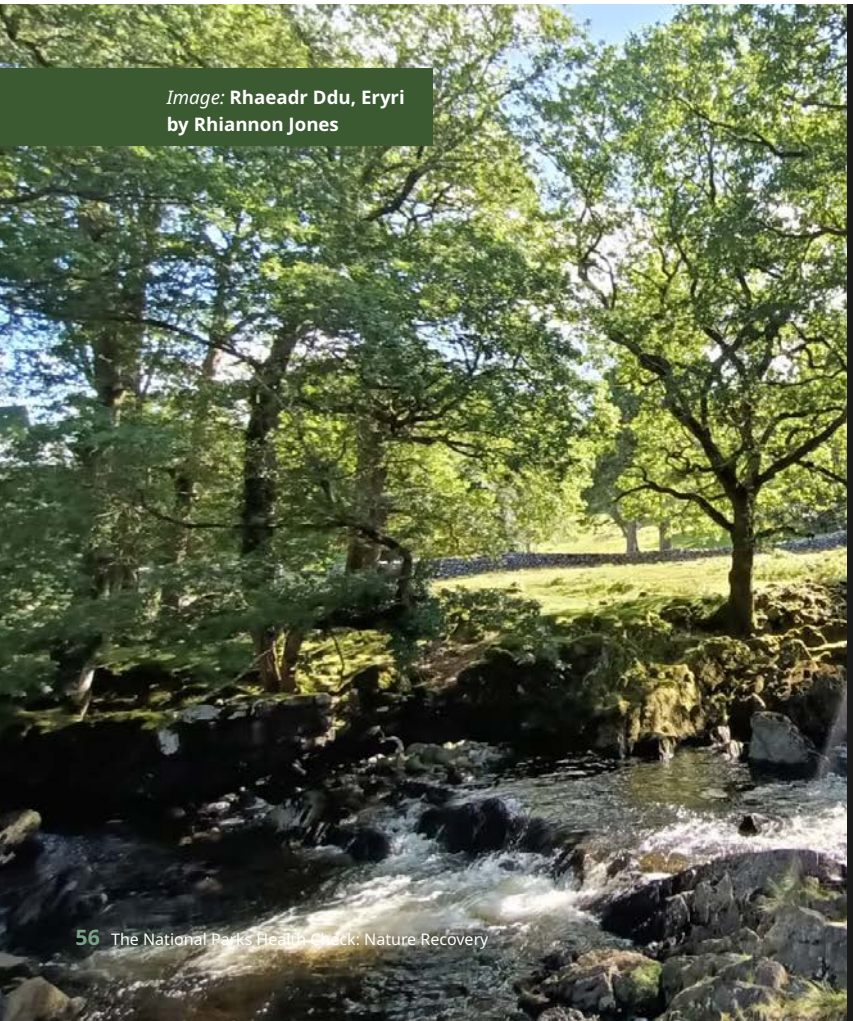


Image: **Rhaeadr Ddu, Eryri by Rhiannon Jones**

CASE STUDY: Celtic Rainforest Wales

With mild temperatures, plenty of rainfall, narrow gorges and steep slopes protected from over-grazing, Eryri National Park offers some of the perfect conditions for the last remaining fragments of temperate rainforest.

Temperate rainforest has declined across Wales for a variety of reasons including the impacts of invasive species such as *Rhododendron ponticum*, grazing from sheep and deer, the planting of conifer trees and atmospheric nitrogen pollution.

The 7-year Celtic Rainforest Wales project was launched in 2018 to halt this trend and encourage regeneration of four areas of ancient woodland in West Wales – Cwm Einion, Cwm Doethie-Mynydd Mallae, Eryri and the Elan Valley.

The £7.5m project is 60% funded by the European Commission with the rest coming from Welsh Government, Natural Resources Wales and Welsh Water, and has already been successful in improving conditions through conservation grazing, eradication of *Rhododendron ponticum*, thinning of woodland and removal of non-native species.

4.4 Freshwater health

The waterways of the National Parks are some of the most iconic. The Broads is the most biodiverse wetland in the UK; its rivers, fenlands, wet woodlands, flood plain and open reaches create a mosaic of habitats that contain more than a quarter of Britain's rarest animals and plants. The mountains of Eryri and the Lake District include spectacular glacial lakes. From the South Downs spring a significant proportion of the world's chalk streams. The uplands of Dartmoor and Exmoor include wet bogs and sensitive headwaters of rivers, including important breeding grounds for critically endangered species such as salmon. The waterfalls of Bannau Brycheiniog are world renowned. Every year, millions of people explore these rivers, pools, lakes and wetlands, and wild swimming has become increasingly popular. These waters are the lifeblood of the landscape, supporting a huge number of species.

Healthy water bodies deliver a range of benefits: in addition to supporting biodiversity, they contribute to improved drinking water quality, support natural flood management, enhance climate mitigation, and are, of course, much valued by people as places for recreation and relaxation. The condition of water bodies in National Parks has implications far beyond the boundaries of those Parks. There is now a growing understanding of the links between the quality of freshwater and the health of our oceans and the impact that land-based pollutants are having on marine life. Pollution can affect both groundwater and surface water and the key causes include sewage spills and nutrient and sediment contamination resulting from agricultural activities, such as the spreading of fertilizers and manures. Over-abstraction can lead to streams running low or even dry with devastating consequences. The changing climate is also having an impact. It has been calculated that drier summers could result in some rivers having up to 80% less water in summertime by 2050, increasing the concentration of pollutants and the impact of water abstraction. Wetter winters and more frequent intense rainfall result in increased flooding and more pollutants being washed off fields and roads into nearby water bodies[65].

Under the Water Framework Directive (WFD) which still applies in the UK, all groundwater and surface waters, including lakes, running waters and coastal waters up to one nautical mile off the coast are required to be in clean and in good ecological health by 2027[66]. This law also requires the EA in England and NRW in Wales to assess the ecological health of water bodies. Their assessments include monitoring of biological data (such as abundance of fish, invertebrates and plants), chemical data (such as the presence of pollutants, pesticides and nutrients), habitat condition and river flow. It also includes analysis

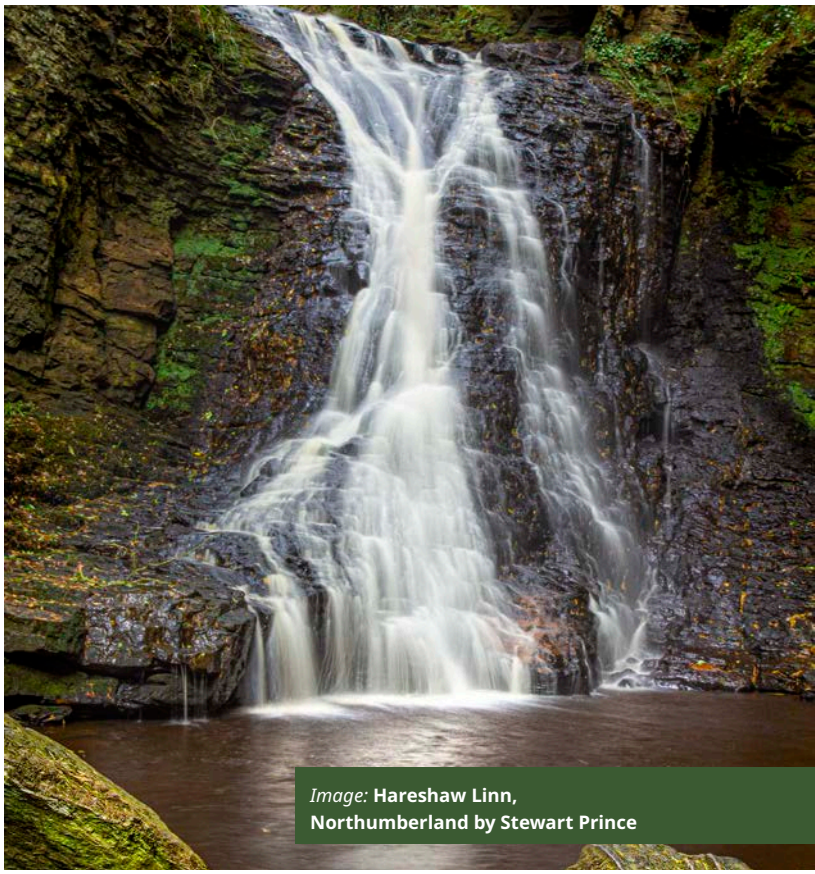


Image: **Hareshaw Linn, Northumberland by Stewart Prince**

of the reasons for failure and apportionment to sectors causing the damage. This provides a ready-made wealth of information on the state of the water environment within National Parks. However, National Park (and National Landscape) status is largely ignored when it comes to presenting information and setting targets for improvements. Information on water body health is not made available for each National Park by the EA, NE or NRW. While some National Park Authorities do make data available on water body health, there is not a comparable and consistent method for how they calculate this.

We commissioned analysis of datasets published by NRW and the EA, and using GIS we mapped the water bodies (small sub-parts of catchments) and all those water bodies which fell, at least in part, within the National Park boundaries were analysed.

In England, we 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% for lakes[67]). 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[68]. As Tables 4.5 and 4.6 show, we found a declining trend over time, with the proportion of National Park rivers meeting good ecological status or higher dropping from 47% in 2013, to 39% in 2022. National Park lakes declined from 18% to 15% over the same period.

Table 4.5: **Ecological status of rivers in English National Parks**

	WFD Cycle 2				WFD Cycle 3	
	2013	**2014**	**2015**	**2016**	**2019**	**2022**
High	0.6%	0.6%	0.8%	0.8%	0.6%	0.6%
Good	46.5%	39.5%	40.7%	39.5%	41.5%	38.8%
Moderate	43.6%	47.7%	46.9%	49.2%	46.3%	39.6%
Poor	7.0%	10.1%	10.5%	9.7%	11.0%	12.5%
Bad	1.0%	1.4%	1.2%	0.8%	0.6%	0.6%
Unknown	1.4%	0.8%	0.0%	0.0%	0.0%	7.8%
Total Good or High	47.1%	40.1%	41.5%	40.3%	42.1%	39.4%
Total failing	52.9%	59.9%	58.5%	59.7%	57.9%	60.6%

Source: Environment Agency, Catchment Data Explorer, analysed by Lestari for CNP

Table 4.6: **Ecological status of lakes in English National Parks**

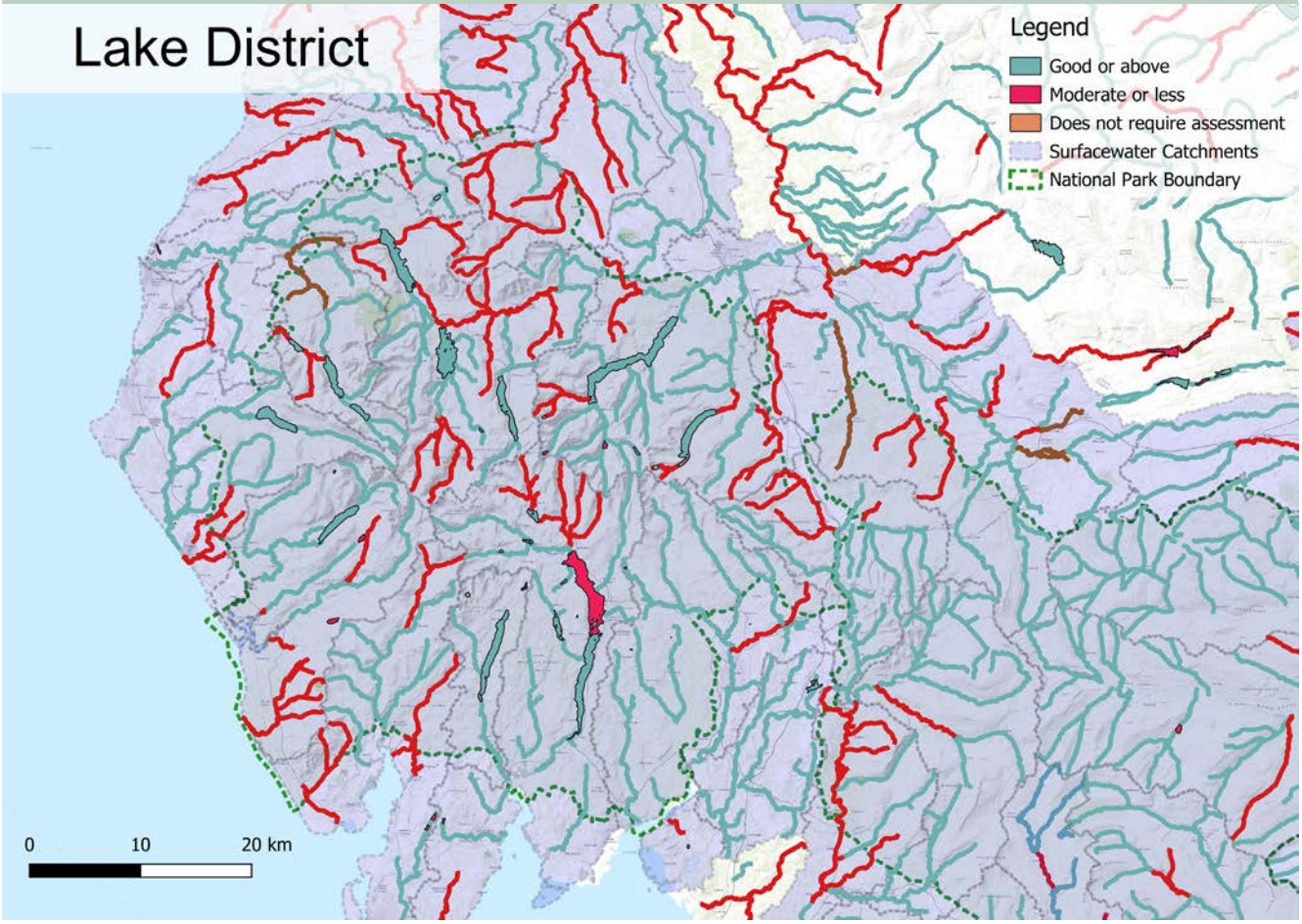
	WFD Cycle 2				WFD Cycle 3	
	2013	**2014**	**2015**	**2016**	**2019**	**2022**
High	0.0%	0.0%	0.8%	0.8%	0.8%	0.8%
Good	18.2%	19.7%	15.2%	17.6%	19.1%	14.4%
Moderate	65.2%	59.1%	68.9%	67.2%	65.6%	37.9%
Poor	11.4%	14.4%	9.1%	8.4%	9.2%	7.6%
Bad	0.0%	1.5%	0.8%	0.8%	0.0%	0.8%
Does not require assessment / unknown	5.3%	5.3%	5.3%	5.3%	5.3%	38.6%
Total Good or High	18.2%	19.7%	15.9%	18.3%	19.8%	15.2%
Total failing	81.8%	80.3%	84.1%	81.7%	80.2%	84.8%

Source: Environment Agency, Catchment Data Explorer, analysed by Lestari for CNP

Water quality maps:

The Lake District has seen the highest recorded number of sewage spills of all National Parks. It also has the only English Lake in high ecological condition.

Click here for water quality maps for all the National Parks.



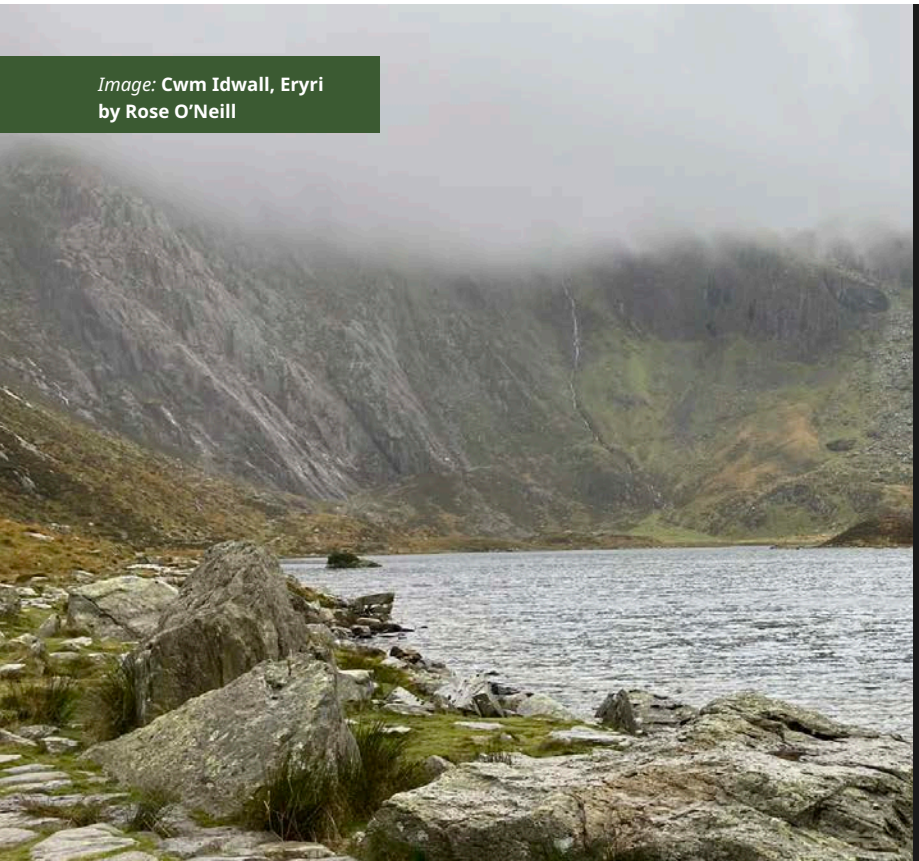


Image: **Cwm Idwall, Eryri by Rose O'Neill**

CASE STUDY: Llyn Idwal, Eryri National Park

Llyn Idwal is a National Nature Reserve and an internationally designated Ramsar wetland surrounded by dramatic mountain scenery. It is a glacial lake at high overall status, with crystal clear waters supporting a variety of rare plants and animals; Charles Darwin was known to visit the area for his scientific work. Managed by a partnership of the National Trust, Eryri NPA and NRW, grazing was abolished in the reserve over 25 years ago, and the habitat has transformed from grassland to dry heathland, with trees such as holly and rowan returning.

Image: **Yr Wyddfa, Eryri by Lauren Simmonds**

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 lakes[69] (see Table 4.7)). While this is favourable compared to England, Afonydd Cymru has raised concerns about the NRW assessments, and suggests that the country difference is due to the difference in monitoring and reporting, as opposed to tangible environmental improvement[70].

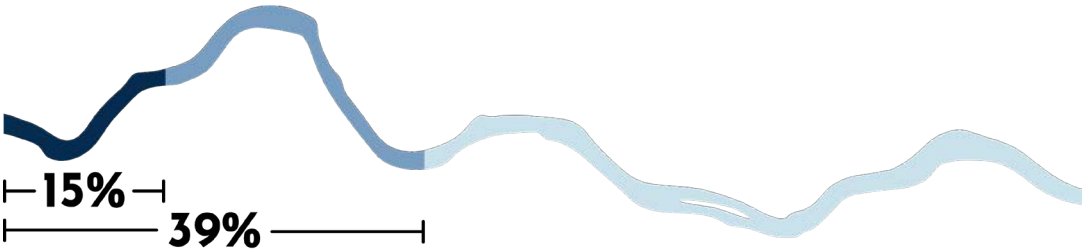
Table 4.7: Overall status of rivers and lakes in Welsh National Parks

	Rivers		Lakes	
	2017 (C2)	2021 (C3)	2017 (C2)	2021 (C3)
High	0.0%	0.0%	1.8%	1.8%
Good	42.0%	50.6%	19.6%	19.6%
Moderate	50.6%	43.1%	62.5%	62.5%
Poor	7.5%	6.3%	16.1%	16.1%
Total good or higher	42.0%	50.6%	21.4%	21.4%
Total failing	58.0%	49.4%	78.6%	78.6%
Total water bodies	174	174	56	56

Source: Natural Resources Wales, WFD Classification Data, analysed by Lestari for CNP

National Parks in England and Wales are outperforming the rest of the country when it comes to river and lake health. But National Parks are rural landscapes with a much lower population density than the rest of the country, and they are designated to protect nature: we would expect water regulators to set much higher standards. This is not the case, as objectives set by EA and NRW under the Water Framework Directive, or included by the water companies in business plans, do not take account of National Park status, instead only setting higher objectives for SSSIs. Many of the rivers and lakes in National Parks do not have objectives to get to good status before 2027, because it is deemed "disproportionately costly".

In 2019 (the last time there was a full assessment), just four of the 650 water bodies in English National Parks met the criteria for high ecological status (0.6%) – three rivers in Northumberland and one lake (Burnmoor Tarn) in the Lake District. In Northumberland, the three rivers are the upper-most headwaters of the Till and the Coquet, in the Cheviot Hills. Described as a "fisherman's paradise", the rivers are spawning grounds for sea trout, brown trout, salmon and grayling. Even here, in the most pristine rivers and lakes in England's National Parks, traces of toxic chemicals including mercury and other priority hazardous substances are found. Because of these toxic chemicals, which can remain in the ecosystem for decades, not a single water body in an English National Park is in good overall health[71]. No rivers, and a single lake (Llyn Idwal in Eryri) are assessed as being in high overall status in Wales.



15% of lake and 39% of river waterbodies in English National Parks are in good or above condition

Table 4.8: Proportion of National Park waterbodies (rivers and lakes) meeting at least good status.

England		
National Park	**Cycle 2 2016**	**Cycle 3 2019**
Broads	7.1%	7.1%
Dartmoor	35.1%	29.8%
Exmoor	52.8%	52.8%
Lake District	46.5%	55.5%
New Forest	20.8%	16.0%
North York Moors	22.1%	25.0%
Northumberland	63.3%	63.3%
Peak District	17.0%	16.3%
South Downs	15.6%	17.8%
Yorkshire Dales	50.5%	56.3%

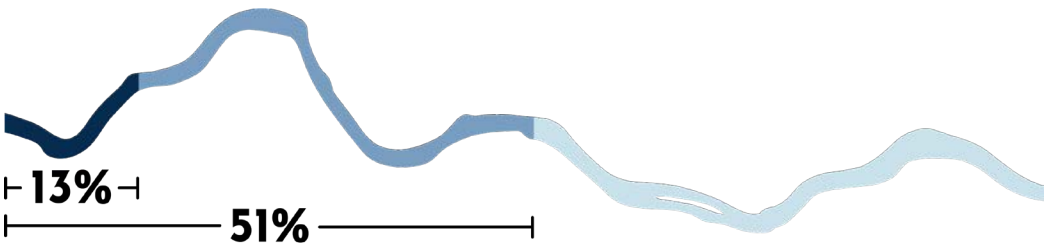
Wales		
	Cycle 2 2017	**Cycle 3 2021**
Bannau Brycheiniog / Brecon Beacons	43.4%	36.8%
Eryri / Snowdonia	29.0%	62.2%
Arfordir Penfro / Pembrokeshire Coast	48.3%	28.0%

Source: NRW and EA data, analysed by Lestari for CNP
Notes: NRW cycle data does not give year, based on C2 data published in 2017, and C3 in 2021. EA cycle data includes end of C2 (2016) and last full assessment in C3 (2019). Data relates to ecological status in England, overall status in Wales.

We analysed the latest full assessment for rivers and lakes in each National Park, which showed wide variation in the proportion in good health (see Table 4.8). This variation is largely a factor of geography and population. National Park boundaries tend to cut across catchments: many of the upland Parks contain sensitive headwaters and glacial lakes, with low populations, which would be expected to be higher quality. Whereas the waterways of the Broads and the Pembrokeshire Coast are downstream, at the bottom of the catchment, and would therefore be expected to contain pollutants drained from land, towns and cities upstream.

We have noted that these figures vary from the figures published in some Management Plans due to the method used: our bespoke analysis focuses on only water bodies that fall within National Parks, whereas some Management Plans have used wider catchment data, which may include water bodies that fall outside the Parks.

Restoring rivers and lakes to health will, in many instances, require working beyond the National Park boundaries, as exemplified by the Broads NPA, which co-hosts the Broadlands catchment plan with the Norfolk Rivers Trust. The partnership[72] recognises that the health of the waters within the Broads is dependent on the health of the rivers Bure, Wensum, Yare and Waveney, that flow upstream over an area 100 times the size of the Park before draining into the Broads. While it is imperative to take a catchment approach, National Park Management Plans do have a key role in setting ambitious objectives and bringing different parties together to deliver them. The new duties under the Levelling Up and Regeneration Act 2023, in England, require water companies and regulators to play a more significant and proactive role to further enhancement of wildlife and public enjoyment of waterways in the Parks, which critically, needs to result in setting much higher standards.



13% of lake and 51% of river waterbodies in Welsh National Parks are in good or above condition

CASE STUDY: The Meon, a chalk stream in the South Downs

The river Meon is a spring-fed chalk stream, one of only around 200 or so in the world. In 2022, it was classed as in 'moderate ecological status', with fish numbers, including brown trout and critically endangered eel being low. The likely cause: low river flows due to a combination of water abstraction and climate change. It's incredibly important to assess the health of the ecosystem but on the Meon, like elsewhere, monitoring has become less frequent due to cuts to the EA's budget. Despite being in a National Park, and a chalk stream, because it is not a SSSI, it is not considered a priority by the EA or water companies. It was therefore considered to be "disproportionately expensive" to return the river to full health. But there are steps forward: a partnership including the South Downs NPA reintroduced almost 3,000 water voles; Wessex Rivers Trust is undertaking river restoration; and the Hampshire and Isle of Wildlife Trust are showing the positive impact of conservation grazing on the ancient water meadows.

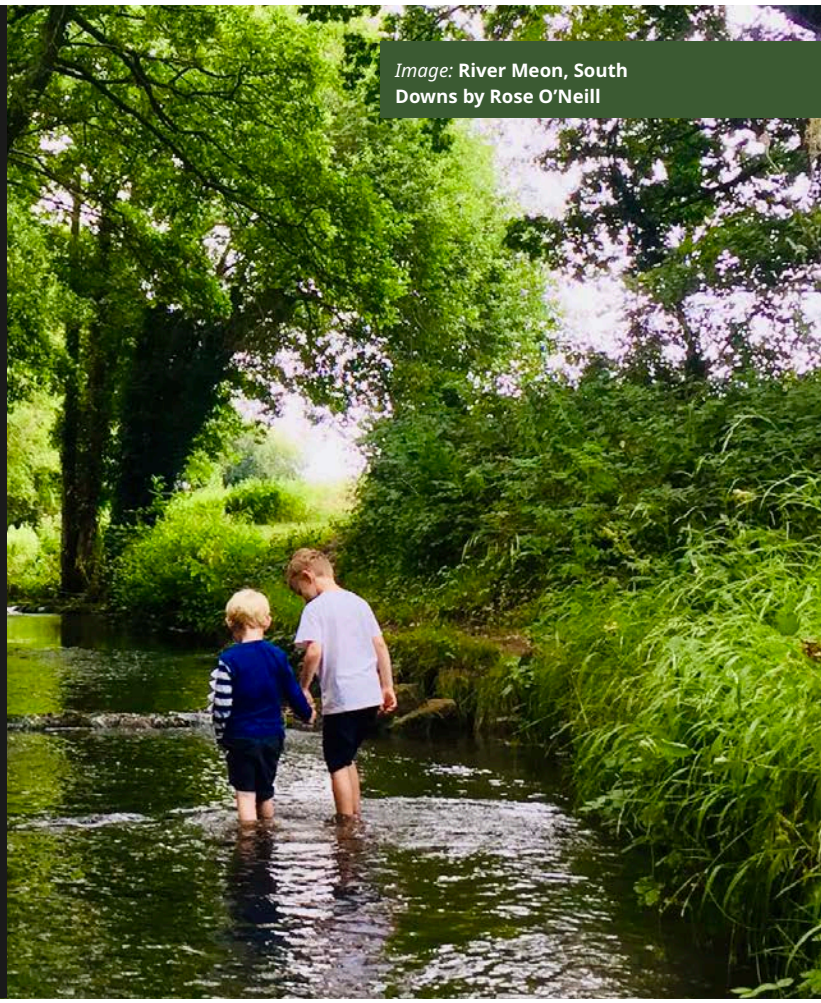


Image: **River Meon, South Downs by Rose O'Neill**

Sewage pollution is one of the main reasons for failure. Analysis undertaken for us by Greenpeace found that 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). Eighty of those (totalling 40,872 hours) were within 50m of a water body (lake, stream etc.) within a protected area. Tables 4.9 and 4.10 below show that there are significant variations in the levels of discharges between water companies and the extent to which different National Parks are affected. 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.

"It takes a lot to shock me, but that this is happening in 2023 is an absolute disgrace. To see that murk and muck flowing into this beautiful stream, doing what is unquestionably enormous ecological damage – I'm furious."

Naturalist and New Forest resident Chris Packham, on Southern Water's sewage failures.

Table 4.9: Sewage discharges (duration, EDM releases and no. of spills) within National Parks for each water company in England and Wales

	Total spill hours	Spill count (using 12/24 count method) in NP	Total EDM releases in National Parks
		Wales	
DWR Cymru / Welsh Water	51555.75	5635	108
		England	
United Utilities	43461.96	3855	54
South West Water	34182.11	2736	56
Southern Water	20387.35	1524	44
Severn Trent Water	12237.40	1195	34
Yorkshire Water	10149.96	2278	54
Anglian Water	2964.3	316	14
Northumbrian Water	1338.71	258	6
Thames Water	419.01	40	2
Wessex Water	121.05	114	5
England total	**125261.85**	**12316**	**269**
England and Wales total	**176817.60**	**17951**	**377**

Credit: Data produced from Greenpeace Unearthed research

CASE STUDY: Save Windermere, the Lake District

Lake Windermere attracts thousands of visitors every year to boat, swim, canoe and paddle board. But increasingly the lake is turning green with algal blooms, causing significant fish kills, and people are advised not to go into the water due to hazards to health. 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 treated and untreated sewage discharges into the Windermere catchment, taking inspiration from Lake Annecy in France, which was brought back from the brink thanks to strict pollution regulations. Save Windermere is calling for an independent inquiry into the EA, due to lack of enforcement and weak permits, arguing that as England's largest and most iconic lake, the regulator should uphold the highest standards.

Image: **Harriet Gardiner**

Table 4.10: Sewage discharges (duration, EDM releases and no. of spills) for each National Park in England and Wales

National Park	Total spill hours	Total EDM releases	Spill count
Lake District	31906	40	2766
Eryri / Snowdonia	30114	48	2951
Dartmoor	28279	44	2185
Yorkshire Dales	18014	31	2244
South Downs	17310	34	1237
Bannau Brycheiniog / Brecon Beacons	13197	34	1870
Peak District	11979	37	1229
Arfordir Penfro / Pembrokeshire Coast	9414	28	959
Exmoor	6024	17	665
New Forest	3497	12	327
North York Moors	3305	35	1053
Broads	2964	14	316
Northumberland	814	3	149
Total	**176817.595**	**377**	**17951**

Credit: Data produced from Greenpeace Unearthed research

A major part of the problem is that sewage works are under capacity. While the population of permanent residents in the 13 English and Welsh Parks is around 399,400[73], there are more than 90 million visitors each year[74]. This means that in peak summer months, when river flows are lowest, temperatures highest and freshwater ecosystems at their most sensitive, the influx of visitors can massively increase the pressure on sewage systems designed for a fraction of the population.

There is a further perverse effect, in that most wastewater treatment works in National Parks are designed to much *lower* standards than urban equivalents. Under UK law, works serving less than 2,000 people are not legally required to use secondary or advanced treatments or monitor overflows. Despite National Park status, even 'treated' sewage from wastewater plants can be hugely damaging to freshwater species and to human health.

In addition to the legal targets in England and Wales under the WFD, the Westminster Government has set legally binding targets[75] to reduce some of the main water pollutants by 2038 (compared to a 2018 baseline), including to:

- Reduce nitrogen, phosphorus and sediment pollution from agriculture into the water environment by at least 40%.
- Reduce phosphorus loadings from treated wastewater by 80%.
- Require water companies to have eliminated all adverse ecological impact from sewage discharges at all sensitive sites by 2035, and at all other overflows by 2050.

There are also targets aimed at reducing demand for water and pollution from abandoned mines.

In Wales, NRW has set individual phosphorous targets for all the water bodies in Protected Areas (SACs) in Wales[76] and in 2021 they reported a failure rate of 61%.

In both England and Wales, National Park water bodies should be prioritised to support meeting these national targets in order to contribute to delivery of the 30x30 commitment.

4.5 Protected Areas health

Parts of National Parks have been identified as being of national or international importance for biodiversity and given a specific designation to reflect this. These designations include:

- Protected Areas designated under national legislation, including Sites of Special Scientific Interest (SSSIs) and National Nature Reserves.
- Protected Areas that were originally designated under European legislation including Special Areas of Conservation (SACs) which support internationally important habitats and/or species and Special Protection Areas (SPAs) which cover areas of particular importance for rare or vulnerable species of birds.

Image: **Bridestones, North York Moors by RJB Photographic**

Table 4.11: Protected Areas as proportion of total NP area (%)

National Park	SACs	SSSIs
Broads	20%	24%
Dartmoor	27%	27%
Exmoor	18%	28%
Lake District	16%	18%
New Forest	54%	57%
North York Moors	31%	33%
Northumberland	5%	12%
Peak District	32%	35%
South Downs	2%	6%
Yorkshire Dales	20%	26%
All NPs in England	**19%**	**24%**
Bannau Brycheiniog / Brecon Beacons	2%	19%
Arfordir Penfro / Pembrokeshire Coast	14%	18%
Eryri / Snowdonia	26%	29%
All NPs in Wales	**17%**	**24%**

Credit: NRW and NE datas analysed by Lestari for CNP

Statutory requirements ensure that land covered by such designations is subject to specific management requirements and is provided with long-term protection against inappropriate development or damaging activities. There are often significant incentives to support the additional management required such as higher agri-environment scheme payments or greater levels of investment from water companies. The owners of land in SSSIs must seek permission from the relevant statutory body (Natural England (NE) or Natural Resources Wales (NRW)) before carrying out certain tasks or changing an existing management regime. NE and NRW have responsibility for assessing, and reporting on, the condition of SSSIs on a regular basis. Official government guidance suggests this should happen at least once every six years[77] but in practice monitoring happens less frequently in many cases. Where the condition of a SSSI has declined, a management scheme can be put in place to conserve or restore special features. There is a legal requirement on landowners to implement the measures set out in such schemes and failure to implement management schemes can result in an unlimited fine for the landowner, or even compulsory purchase of the land as a last resort. The statutory bodies can also take enforcement action against landowners where they are concerned about wilful or reckless damage to a SSSI.

Table 4.12: Condition of SSSIs in National Parks (data from 2020)

National Park	% Favourable
Broads	60%
New Forest	53%
South Downs	53%
Northumberland	33%
Yorkshire Dales	29%
Eryri / Snowdonia	28%
Lake District	23%
Bannau Brycheiniog / Brecon Beacons	22%
Dartmoor	19%
Peak District	16%
Exmoor	15%
Arfordir Penfro / Pembrokeshire Coast	14%
North York Moors	12%
ALL ENGLAND NPs	**26%**
ALL WALES NPs	**25%**

Source: NRW and NE datas analysed by Lestari for CNP

Condition of Protected Areas

Using the most recently available data supplied by Natural England, and additional analysis we commissioned, we have examined the condition of Protected Areas in National Parks and considered how that compares to the condition of such areas outside the National Parks. In England, only around a quarter of SSSIs in National Parks are in favourable condition, compared to an average of 38% across all the SSSIs nationally. Therefore, far from being the exemplars for nature they should be, National Parks are actually lagging behind much of the rest of the country. In Wales, the way in which SSSI condition is assessed is slightly different, but the evidence here suggests that while SSSIs in Welsh National Parks are not faring any better than in England (around 23% of their features are in favourable condition) they are doing better than those outside National Parks where only 19% of features are in favourable condition.

As Table 4.12 shows, there is also significant variation between the National Parks with 60% of SSSIs in The Broads being 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%.

SSSI condition maps:

The Broads has the highest percentage of SSSI sites in a favourable condition.

Click here for SSSI condition maps for all the National Parks.

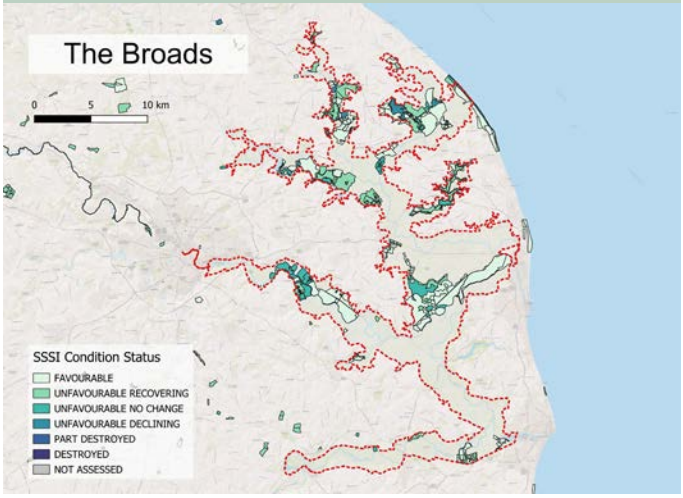


Image: **Rose O'Neill**

CASE STUDY: New Forest

The New Forest is a mosaic habitat that supports thousands of species. It's one of the most heavily protected National Parks, over half is designated as an SSSI and an SAC, and its coastline is part of the Solent SPA. It's home to a huge number of rare and precious species including nightjar, hen harrier and curlew. It's a natural environment entirely shaped by and dependent upon its rich cultural heritage, the ancient tradition of commoning, grazing ponies, cows and pigs on the open forest.

A large part of the National Park is owned by the Crown and managed by Forestry England. Since the start of the 20th Century, forestry has been one of the most damaging practices, as habitat was drained and cleared to grow trees for timber production. Today, this remains one of the key reasons why the Protected Areas are not in Favourable Condition. At Franchises Lodge, a nature reserve recently bought by RSPB (with support from the NPA and Friends of the New Forest), and at Royden Woods owned by the Hampshire and Isle of Wight Wildlife Trust, forestry plantations are being restored to former habitats and nature is quickly coming back.

Of particular concern is the fact that there has barely been any improvement in these figures since the last time we undertook a similar analysis for our 2018 *Raising the Bar* report[78], despite the fact that in both England and Wales since then there have been various initiatives which emphasised the key role that National Parks have to play in supporting nature recovery. It is also disappointing that the most recent data that NE was able to provide was from 2020, and the data we have for Wales is also from 2020.

Monitoring data for SACs shows that only around 9% (by area) of SACs in Welsh National Parks is assessed to be in favourable condition compared to 35% in areas outside National Parks. In England, 17% of SACs in National Parks are assessed to be in favourable condition compared to 42% in areas outside National Parks.

The majority of SSSIs in England – nearly 70% in total – are assessed as being in 'unfavourable – recovering' condition (the other alternatives are 'unfavourable – no change', 'unfavourable – declining', 'part destroyed' and 'destroyed').

However, Wildlife and Countryside Link have highlighted that until recently the only requirement needed to secure this classification was the existence of a management plan for the site. Many SSSIs have been recorded as 'recovering' for several years now without any real improvement, and some may have even declined over this period[79].

As if that was not bad enough, these figures don't even provide a complete picture of the state of SSSIs in the National Parks as there is no up-to-date monitoring information for the majority of them. The condition of around 65% of the SSSIs in Wales is recorded as unknown and only 22% of SSSIs in England were visited for monitoring purposes in the six years between 2015 and 2021[80]. Without regular monitoring to assess their condition, it is impossible to tell whether SSSIs are improving or not. A further issue is that the existing system of SSSI condition assessments is often not well suited to providing an accurate understanding of the state of large complex sites with many SSSI features.

The Environmental Improvement Plan[81], published in January 2023, includes several new targets and actions relating to SSSIs in England, including:

- All SSSIs are to have an up-to-date condition assessment by the end of January 2028.
- 50% of SSSIs are to have actions on track to achieve favourable condition by the end of January 2028.
- 75% of Protected Areas are to be restored to favourable condition by 2042.
- The implementation of a whole feature assessment approach to ensure there is a better understanding of how SSSIs are functioning.

These are all welcome commitments but delivering them will require **increased investment in the monitoring of the condition of Protected Areas to ensure that monitoring is both more frequent and more detailed than is currently the case. NE and NRW also need to respond to the results of condition assessments more effectively including improving the way in which they report those results, so that all parties involved are clearly aware of the changes required and their role in delivering those changes.**

The Welsh Government has committed to a number of related changes as part of the Biodiversity Deep Dive recommendations published in 2022[82] including to:

- Ensure Protected Areas are a priority for NRW through corporate and future strategies and provide adequate funding.
- Review the SSSI series to inform an accelerated notification programme.
- Establish a monitoring and evidence task group to continue the work needed to establish robust and appropriate monitoring and evidence frameworks for 30x30.

Image: **Moorland burning, North York Moors**

Reasons for poor condition

We wanted to get a better understanding of the reasons why so few SSSIs in National Parks are in good condition, so we undertook some further analysis of the assessments published by Natural England for SSSIs recorded as being in 'unfavourable' condition. We were unable to do a similar comparison for Wales as NRW were not able to provide the relevant data without charging us for the cost involved in collating it, nor to advise in advance what that cost would be.

We reviewed the assessment for a sample of SSSIs classified as being in 'unfavourable – declining' condition in three of the National Parks (Lake District, North York Moors and The Broads). This included a total of 126 SSSIs and 175 reasons for poor condition (more than one reason was given in some cases). The reasons which featured most frequently included: mismanaged livestock grazing (either under-grazing or overgrazing); pressure from deer browsing; the spread of invasive species (often attributed to a lack of active management); scrub encroachment; water pollution; and human impacts including the presence of active drainage or damage from tractors.

Analysis of the reasons for 'unfavourable' condition of habitats identified that more than half the woodland habitats in the sample were affected by deer browsing and/or overgrazing and nearly a third of the water-based habitats by water pollution or nutrient enrichment.

An analysis by RSPB of data for all the National Parks in England in 2020 found that by far the most frequently cited reasons for unfavourable condition of SSSIs were moor burning and overgrazing, as shown in Table 4.13 below:

Table 4.13: Reasons for unfavourable SSSI condition in England's National Parks

Reason for unfavourable condition	Area of SSSI affected (km sq)
Moor burning	560
Overgrazing	530
Other	176
Drainage	139
Inappropriate ditch management	65
Forestry and woodland management	64
Inappropriate CSS/ESA prescription	61
Undergrazing	50
Air pollution	50
Inappropriate scrub management	46

Source: RSPB. This analysis was carried out using Natural England's 'Reason for Adverse Condition Summary' data for England's SSSIs. This was provided to the RSPB by Natural England in April 2020. The RSPB filtered the data so that it only included SSSIs inside England's Protected Landscapes and calculated the area of SSSI each reason for unfavourable SSSI condition was responsible for. The above table lists the top 10 reasons for unfavourable SSSI condition by area inside England's National Parks.

There are several key areas where concerted action is needed to improve the condition of Protected Areas in National Parks. **NRW/NE must put far more effort into ensuring that the land in Protected Areas is managed effectively, that appropriate grazing regimes are agreed and implemented and that the negative impacts of drainage, pollution, nutrient enrichment and moorland burning are reduced. Government should provide the necessary powers and resources to ensure this can happen.**

While there are some exceptions, Table 4.13 shows that it is generally the upland National Parks where there is the highest proportion of SSSIs in poor condition, which suggests that there is a particular problem with the management of such areas. Many of the upland National Parks also contain a high percentage of peatlands as shown in Table 4.1. Changes are needed to ensure that peatlands and other moorland habitats are being managed effectively, as demonstrated by the case of the Forest of Dartmoor SSSI[83] where both peatland restoration and changes to grazing practices are required in order to restore the SSSI to favourable condition. **To ensure that a much greater proportion of SSSIs can be maintained in favourable condition in future, the Welsh and Westminster Governments must expedite the phasing out of damaging and intensive land management practices and should ensure that agri-environment schemes are being implemented in a way which supports the adoption of appropriate grazing regimes.**

CASE STUDY: The Wye Valley project, Peak District National Park

Initially supported by a share of a £7.4m pot from DEFRA, the Wye Valley Project aims to work with farmers and landowners in the Peak District National Park to create a network of wildlife rich habitats. Grazing fields have been planted with wildflowers and herbal leys to create and improve wildlife-rich habitat and establish a series of stepping stones across the park linking SSSI sites as part of a growing Nature Recovery Network that increases climate resilience and provides nature corridors for bees, butterflies and birds and mammals enabling them to survive, move and thrive.

Image: **Creating herbal leys by Ben Rodgers**

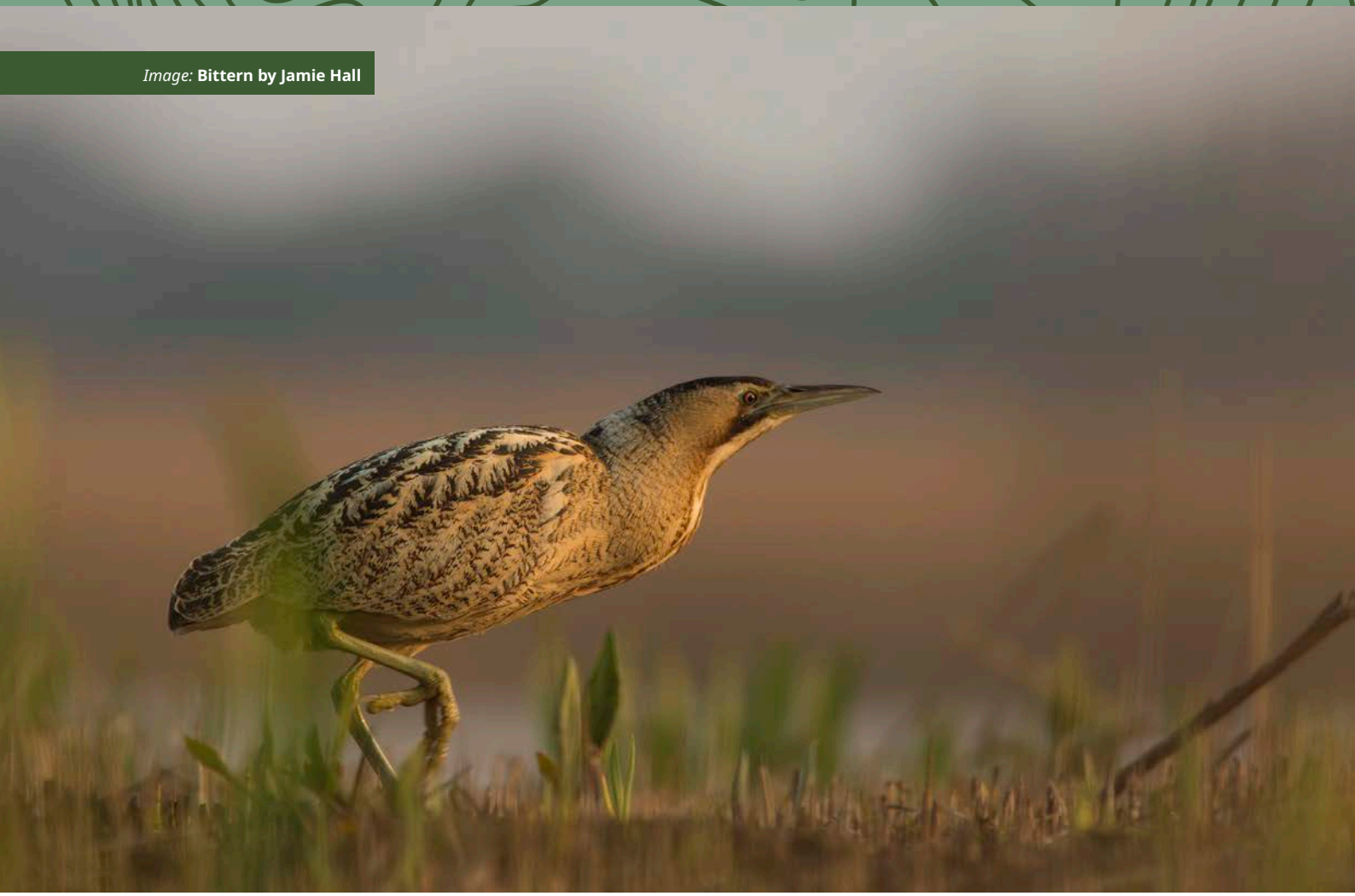


Image: **Bittern by Jamie Hall**

4.6 Species health

We had hoped to include details about the relative abundance of key species in National Parks and how that has changed over time, but it has proved impossible to get the data which allows us to do this comprehensively. It is disappointing that neither Governments, the relevant statutory bodies (NE/NRW) nor the NPAs have been able to provide us with good data on this, particularly given that, in England at least, there are now statutory targets on species abundance (introduced in the Environment Act 2021). To address these failings, we partnered with the National Biodiversity Network (NBN) Trust[84] who manage and support the NBN Atlas to establish what species data is currently available for the National Parks. See Appendix 1 for details of the NBN Atlas.

This research provides an overview of the sightings that have been recorded on the NBN Atlas since the year 2000 – a total of over 10 million records. However, it is difficult to use this information to infer trends in species abundance over time, primarily because there can be significant variations simply as a result of changes in the amount of time and effort being put into recording in different places, with there often being more records in easily accessible areas. There are also limitations on the way some records are shared, particularly for sensitive species. However, this research does provide useful insights into the presence of certain key species of concern in National Parks. It also provides a guide to the availability of data records on particular species and an indication of where further survey effort may be needed in order to provide more comprehensive datasets in future.

Table 4.14 shows that the South Downs, the most heavily populated of the National Parks, has by far the highest number of records – more than double the number that exist in any of the other Parks. However, the Broads has by far the highest density of records with over 3000 records per km^2. Only three other Parks (the New Forest, Pembrokeshire Coast and the South Downs) have over 1000 records per km^2 and the equivalent figure for several of the other Parks is below 500. The number of different types of species recorded also varies significantly between the Parks, with the records for Eryri covering over 9000 different species while those for Northumberland cover fewer than 3000 species.

Table 4.14: Overview of the number of records and species on the NBN Atlas in each National Park since records began and from 2000 onwards.

	Total		Since 2000		
National Park	**Records**	**Species**	**Records**	**Species**	**Records per km²**
Bannau Brycheiniog / Brecon Beacons	978,501	9,856	576,731	7,352	428
Broads	1,243,982	10,186	914,160	6,760	3,039
Dartmoor	1,047,591	7,027	689,610	5,014	722
Eryri / Snowdonia	999,621	13,247	688,692	9,065	322
Exmoor	397,034	6,656	276,568	3,862	399
Lake District	1,017,687	9,406	772,490	5,950	328
New Forest	1,305,777	10,781	978,728	6,232	1,729
North York Moors	759,207	10,366	430,413	5,365	299
Northumberland	194,470	4,325	116,989	2,672	111
Peak District	1,208,859	9,432	915,108	6,958	637
Arfordir Penfro / Pembrokeshire Coast	993,545	10,695	744,874	7,277	1,214
South Downs	2,900,016	11,538	2,335,776	8,041	1,415
Yorkshire Dales	912,284	8,360	663,353	4,506	304

Source: Data provided by NBN Atlas and analysed by NBN for CNP

Image: **Nightingale at Pulborough Brooks, South Downs by RSPB**

Species loss

In both England and Wales, the lists of priority species of particular conservation concern are set out in legislation. These species have been identified for a variety of reasons, including rapid decline in some of their populations. They include some of our most iconic species such as beavers, nightingales and curlews. On average nationally, there has been a significant decline in the populations of these priority species over the last 50 years. By 2021, the relative abundance of priority species in the UK was 37% of the level it was in 1970[85]. There have been particularly strong declines in certain groups of species such as moths and butterflies, while the populations of birds and mammals have remained relatively stable.

There are also internationally agreed lists of species at risk of extinction, with those considered to be at greatest risk included on the Red Lists. The most recent version of the UK Red List for Birds[86] includes 70 species and there are further 103 species on the Amber list. Table 4.15 shows the proportion of species from each category which have been recorded in each of the National Parks since 2000. The highest proportion of species at risk have been recorded in The Broads – this includes 73% of all Amber List and 69% of all Red List species recorded on average each year. The lowest proportion is in Northumberland, where 34% (Amber) and 38% (Red) have been recorded on average annually.

Table 4.15: Proportion of at risk bird species recorded on the NBN Atlas for each of the National Parks since 2000

National Park	Red	Amber
Broads	93%	92%
South Downs	89%	95%
New Forest	87%	86%
Eryri / Snowdonia	87%	88%
Arfordir Penfro / Pembrokeshire Coast	87%	87%
North York Moors	86%	84%
Lake District	83%	83%
Peak District	81%	81%
Bannau Brycheiniog / Brecon Beacons	79%	83%
Yorkshire Dales	70%	77%
Dartmoor	69%	67%
Exmoor	66%	70%
Northumberland	66%	55%

Source: Data provided by NBN Atlas and analysed by NBN for CNP

Image: **Swallow tail butterfly at RSPB Strumpshaw Fen, the Broads by Martin Tosh**

CASE STUDY: Broads Biodiversity Audit[87]

In 2011, the Broads Authority commissioned a biodiversity study for the National Park which had the aim of "examining and quantifying the biodiversity importance and uniqueness of differing habitats and landscape elements to provide an evidence-base to underpin conservation priorities and strategic planning." It also sought to look at the spatial distribution of priority species and "analyse and classify the sensitivity of multiple species to saline incursion, flooding and drying."

The Broads is one of the most biodiverse and important wetlands in Europe and the only place to find the swallowtail butterfly in the UK, a critically endangered species threatened by a changing climate. This detailed report was instigated by the Broads Authority in recognition of their role in mitigating and adapting to climate change, and the diverse ecosystem services and land-uses within the Broads. It also followed recommendations from John Lawton's *Making Space for Nature* report which called for ecological coherence and resilience in the UK's Protected Areas network.

Undertaken by the University of East Anglia and supported by Natural England and conservation organisations in The Broads area, the report collated 1.5 million records and its final recommendations recognised the importance of establishing baseline information, securing long-term surveillance, and using the report to allow strategic decision making.

National Parks are currently among the last refuges for many species on the brink of being lost from the UK and we need to ensure they become the places from which these species recover and are able to spread more widely. For example, the NBN Atlas includes records in the South Downs for around two-thirds of the species of butterflies on the Red List (22 out of 34 species), such as the pearl-bordered fritillary and the Duke of Burgundy, as well as six out of 15 of the most at risk species of dragonfly, including the southern damselfly, and 13 out of 16 of the terrestrial mammals on the Red List, including water voles and beavers[88]. Other examples of priority list species in National Parks include:

- **Cuckoo** – nationally cuckoo numbers have declined by 65% since the 1980s[89] but they have been recorded in all 13 National Parks in England and Wales since 2000 with the highest number of records in Dartmoor, Eryri, New Forest, Peak District, South Downs and The Broads.

- **Hen harrier** – one of the rarest birds of prey in the UK with just 545 breeding pairs (2016 data)[90] but they have also been recorded in all 13 National Parks, with the most sightings in Eryri, New Forest, Peak District, South Downs and The Broads.

- **Nightingale** – numbers are thought to have declined by at least 50% since 1995[91] but they are still found in eight of the National Parks (although the vast majority of sightings are in the South Downs).

- **Curlew** – another rapidly declining bird species with a 48% fall in numbers across the UK from 1995–2015[92], recorded in all 13 National Parks with the highest numbers in Pembrokeshire Coast, Peak District and the Yorkshire Dales.

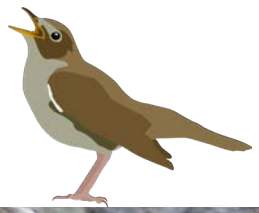
- **Turtle dove** – the UK's fastest declining bird species whose numbers have fallen by an estimated 99% since the late 1960s but has been recorded in all the National Parks except Northumberland, with the most records in North York Moors, South Downs and The Broads.

- **Beavers** – a 'keystone species' whose activities shape the local environment, now being reintroduced in a number of places and already present in all but three of the National Parks, with the most records in the Peak District.

- **Red squirrels** – an endangered species whose numbers have declined by 37% between 1993 and 2016[93], but for which there are good numbers of records in the Lake District, Northumberland and the Yorkshire Dales.

- **Duke of Burgundy** – a butterfly whose numbers declined by 35% between 1979 and 2021[94] but is present in four of the Parks with the largest number of sightings in the Lake District and the South Downs.

The data in the NBN Atlas would be even more useful if it was collected in a consistent way across the National Parks and over time. **With the support of NE, NRW and EA, the NPAs should work together, and with charities such as Butterfly Conservation which organise species monitoring, to support and encourage the role of citizen scientists in helping deliver more comprehensive species records for National Parks.**



CASE STUDY: Beaver reintroduction trial, North York Moors

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 trail comes to a conclusion there is evidence of the positive effect beavers have had in creating dams that are superior to man-made flood barriers in the area. Researchers from Exeter and Leeds Universities are compiling results from here and other locations to inform future reintroductions.

Image: **Beaver Trust, Elliot McCandless**

4.7 Bird crime

Wildlife crime takes many forms and affects a wide variety of species. It causes pain and suffering to the animals and birds affected, and has a negative impact on nature recovery, pushing certain species closer to extinction. We have chosen to focus specifically on raptor (bird of prey) persecution as this is a particular problem in several of the National Parks, mainly in the uplands, and has been identified as one of the priorities for the UK's National Wildlife Crime Unit[95].

As table 4.16 shows, there have been a total of 62 confirmed incidents of raptor persecution in the National Parks in the last five years for which data is available (2018-2022). The majority of these (56 incidents) took place in just three National Parks – the Peak District, the North York Moors and the Yorkshire Dales. There also appears to be a significant difference between England and Wales with only a single incident confirmed in Wales during the whole of this period (in Eryri in 2021). The only other National Parks with reported incidents during this period were the South Downs (four in total) and Northumberland (one incident).

While the numbers fluctuate slightly over this period, there was a noticeable spike in incidents in 2020, suggesting that the Covid lockdowns led to increased incidents of raptor persecution.

Table 4.17 shows that shooting is by far the most common type of offence, accounting for over half of the confirmed incidents in National Parks between 2018 and 2022. The majority of other offences involve poisoning.

More needs to be done to address all these types of offences if birds of prey are to thrive in our National Parks, particularly as the detection rate for these types of offences is very low so the actual number of incidents is likely to be far higher than these numbers suggest. Furthermore, only a handful of these offences resulted in a conviction. There were only two raptor persecution related convictions across the whole of England in 2022[96], and the most recent conviction in Wales was in 2012[97], so the chances of being caught and convicted for this type of crime are very low.

Raptor persecution is an extremely difficult crime to investigate, even where there appears to be good evidence available, as this case study taken from the Wildlife and Countryside Link Wildlife Crime Report 2022[98] demonstrates (see text box).

Table 4.16: Number of bird crimes reported in National Parks since 2018

National Park	2018	2019	2020	2021	2022	Grand Total
North York Moors	2	3	11	1	3	20
Peak District	6	1	8	3	2	20
Yorkshire Dales	3	3	5	2	3	16
South Downs	1		1	2		4
Northumberland	1					1
Eryri / Snowdonia				1		1
Grand Total	13	7	25	9	8	62
Total NYM/PD/YD	11	7	24	6	8	56

Credit: RSPB

Table 4.17: Types of bird crimes committed in each of the Parks (2018–2022)

National Park	Persecution Other	Poisoning	Pole/Spring Trapping	Shooting	Trapping (Other)	Grand Total
North York Moors	1	5	1	11	2	20
Peak District		7		12	1	20
Yorkshire Dales	4	1		10	1	16
South Downs		3		1		4
Northumberland			1			1
Eryri / Snowdonia					1	1
Grand Total	**5**	**16**	**2**	**34**	**5**	**62**

Credit: RSPB

Image: **Mike Lane**

CASE STUDY: Short-eared owl

In June 2022, the RSPB Investigations Team was contacted by a member of the public, a keen birdwatcher, who had witnessed a short-eared owl being shot on a grouse moor at Broomhead in the Peak District National Park. The birdwatcher had spotted a short-eared owl and watched it through his scope as it gracefully quartered the moor. Suddenly, the bird's body was lost in a cloud of feathers as a shot rang out across the moors. The eyewitness managed to record footage of the suspect and reported the incident to the police and the RSPB. The following day, after a thorough search by South Yorkshire Police and RSPB Investigations Officers, the body of the short-eared owl was found stuffed down a rabbit hole. The police identified a suspect and seized a number of items from a local gamekeeper. Despite police efforts there was insufficient evidence to bring any charges. Although the outcome of this case is disappointing, it highlights the issues faced in detecting and investigating raptor persecution. Without the account from this eyewitness, another incident of raptor persecution would have gone undetected.

Neither Government nor the NPAs have provided a breakdown for the factors behind this type of crime in National Parks but they are likely to be similar to those which apply across England and Wales. Research published by Wildlife and Countryside Link shows that the key driver of raptor persecution is the conflict with land managed for gamebird shooting. In 2022 at least 70% of all confirmed raptor crimes across England and Wales were associated with gamebird shooting[99]. In these areas, birds of prey are often deliberately targeted to reduce potential predation on gamebird stocks and reduce disturbance to the quarry species on shoot days. Driven grouse shooting is also associated with other practices that are damaging to wildlife such as burning on peatland in order to create the habitat favoured by species such as red grouse[100].

In response to ongoing raptor persecution, the Scottish Government introduced vicarious liability offences in 2012 which mean that people such as landowners or sporting agents can be held responsible for the illegal actions of their employees. The Scottish Government has also committed to introducing licensing for driven grouse shooting and introduced the legislation[101] to implement this in March 2023, but at the time of writing (March 2024) this is still making its way through the Scottish Parliament and has not yet been passed. **The Westminster and Welsh Governments should follow Scotland's lead and introduce a system of licensing for driven grouse shooting in England and Wales. This should be accompanied by the use of vicarious liability to uphold accountability within any new regulatory system.** Both these recommendations were included in our 2018 *Raising the Bar* report. We are disappointed at the lack of progress on tackling wildlife crime in National Parks in England and Wales since then.

SECTION 5.
WHAT DO NATIONAL PARK MANAGEMENT PLANS TELL US ABOUT NATURE RECOVERY?

Image: **Stanage Edge, Peak District by Kieran Metcalfe**

What are Management Plans?

Every National Park Authority (NPA) is legally required to prepare and publish a Management Plan setting out the priorities for the future management of the area[102]. The Plans usually cover a 5–10 year period and it is a legal requirement that they are reviewed every five years. As well as being an important document in its own right, the Management Plan has a strong influence on other key documents produced by the NPA, including the Local Plan and the Corporate Plan.

NPAs are reliant on a range of other organisations, including major landowners and other key stakeholders such as the statutory bodies (Natural England (NE) and Natural Resources Wales (NRW)), public bodies such as water companies and Forestry England, and local authorities in their area to implement many of the actions needed to deliver the Management Plans. The expectation is, therefore, that the Plans are developed in partnership with these other organisations and that they are Plans for the National Park rather than just the NPA. The importance of the involvement of other organisations is reflected in the fact that a number of the Plans are now called Partnership Plans.

What are the expectations for Management Plans?

NE and NRW are responsible for producing guidance to assist NPAs when preparing and reviewing their Management Plans. To date, the requirements in both countries have been broadly similar, although the Environment Act (Wales) 2016 introduced a Biodiversity and Ecosystems Resilience Duty as well as new requirements for NPAs in Wales to have regard to the State of Natural Resources Report and the relevant Area Statement when preparing their Management Plan. In England, Management Plans must also now take account of the strengthened 'biodiversity duty' in the Environment Act 2021 which requires all public authorities to consider what they can do to conserve and enhance biodiversity. Most recently the Levelling Up and Regeneration Act (LURA) 2023 has introduced new duties relating to Management Plans in England.

The development of Management Plans in England will also now need to take account of the contents of Local Nature Recovery Strategies (LNRSs) which set out priorities for nature recovery in that area. The preparation and delivery of LNRSs is being led by local authorities even though the relevant legislation allowed for NPAs to be the bodies responsible for their area. This means most National Parks are split between two or more LNRSs. Some NPAs have already prepared Nature Recovery Plans which are aimed at ensuring a good alignment between relevant LNRSs and their Management Plan.

Both NE and NRW are in the process of producing updated guidance and the new documents are expected to set out clearer requirements on what should be included in a Management Plan. In the meantime, there is something of a vacuum as the previous guidance for both countries is nearly two decades old and no longer officially available[103].

In January 2024, the Westminster Government published the Protected Landscapes Targets and Outcomes Framework[104] which sets out the Environmental Improvement Plan (EIP) targets which must be prioritised in National Parks. These include bringing 80% of SSSIs into favourable condition by 2042 and restoring approximately 130,000 hectares of peat by 2040. The Framework also sets out how these targets should be incorporated into Management Plans and how progress will be monitored. NE is now working with the individual NPAs to agree how these targets should be apportioned between them. However, NPAs will have up to 18 months to include these targets when reviewing their Management Plan, or to publish them as provisional targets, if there is no review planned within that timeframe. There are also significant gaps as the Outcomes Framework does not include any targets on water quality, species abundance or the role of National Parks in delivering 30x30.

The Welsh Government has taken a different approach and, rather than setting specific targets, has instead given the NPAs a series of priority objectives and actions[105] which they are expected to deliver, including taking action to support delivery of Welsh Government net zero targets and environmental commitments.

Why are Management Plans so important for nature recovery?

The Protected Landscapes could potentially make a significant contribution towards the 30x30 target (see Section 2), but this will only be possible if they have Management Plans which include strong targets on nature recovery and there are mechanisms in place to ensure those targets are monitored and delivered.

What did we assess?

As Management Plans are key documents which should provide a good overview of actions planned across the full range of activities needed to deliver National Park purposes, it was clearly essential for us to review them as part of our 'health check' of National Parks. In later parts of this project we will consider how well National Parks are delivering across a range of objectives, including access, inclusion and climate action. Here we focus on National Parks' contribution to nature recovery and what the Management Plans and associated documents can tell us about the progress being made in this area. We completed our initial analysis of documents in June and July 2023 and updated this in February 2024 to check for progress reports that had been published more recently. We focused primarily on the main Management Plan and other documents directly related to it, such as State of the Park reports. We are aware that some NPAs have also published targets in other documents such as Nature Recovery Strategies and have made reference to some of these but have not included them in our analysis which focuses on targets in the Management Plans.

When considering action on nature recovery, we focused particularly on (i) habitat restoration, (ii) species recovery and (iii) water quality, and considered the following three key questions:

1. **Baseline:** Do the Plans include baseline data on the state of nature in the National Parks? Do they clearly set out the situation on habitat restoration, species recovery, and water quality at the start of the Plan period? This information is essential for understanding exactly what improvements have been made.

2. **Targets:** Do the Plans include specific, time-bound targets for improvement? Is it clear what the Plan is aiming to deliver for nature?

3. **Progress:** What progress is being made against those targets? Are the intended improvements being delivered? Is this information easy to find? And are there clear plans in place to address any lack of progress?

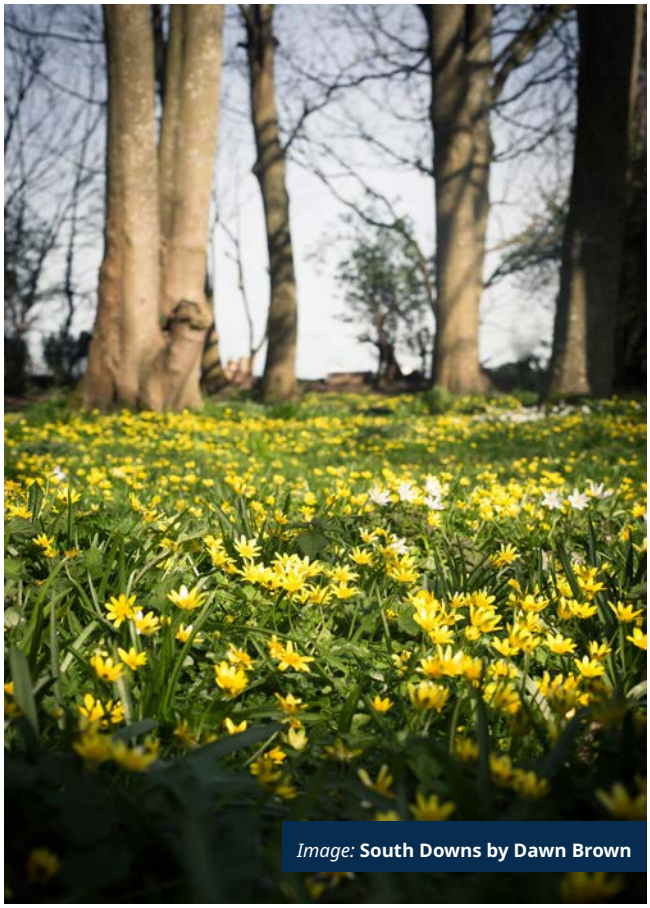


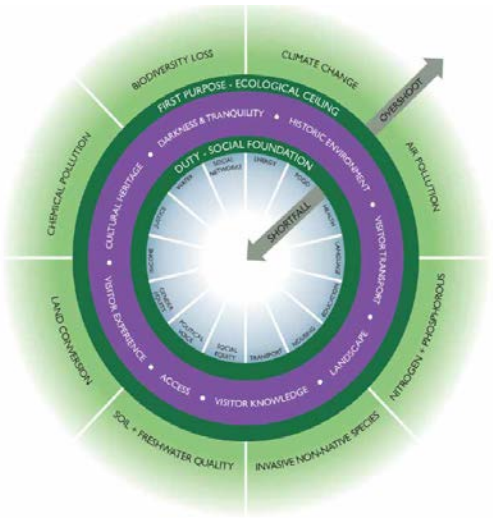
Image: **South Downs by Dawn Brown**

Image: **South Downs by Dawn Brown**

Baseline information on the state of nature

The availability of clear baseline information is important for helping to provide a good understanding of the issues that need to be addressed by the Management Plan. It also makes it easier to see how much difference any targets set will make and how ambitious the Management Plan is. For example, the Lake District Partnership Plan contains a target for 75% of rivers in the National Park to be in good ecological status by 2027 and also includes the information that 37% of rivers had achieved this status in 2019.

In practice, most of the Plans do not contain sufficient baseline information to provide a sense of how ambitious the targets are and none of them provide data for all three of the topics we considered of importance to nature recovery (habitat restoration, species recovery and water quality). Only three out of 13 Plans (Bannau Brycheiniog, Lake District and New Forest) include information for at least two of these topics and this is generally limited to information about SSSI condition, woodland coverage and water quality and is often scattered throughout the Management Plan text rather than gathered in one place. However, the New Forest Plan does include a section early on entitled "Major Issues for the National Park" which lists "key state-of-play indicators" including only 53.2% of SSSIs in favourable condition and a 30% decline in breeding waders, but these are undated.



CASE STUDY: Bannau Brycheiniog's presentation of baseline nature data

This Plan[106] includes a diagram described as 'The Bannau Brycheiniog Ecological Ceiling 2022' (p. 89) which provides "a snapshot of the current situation" alongside the intended improvements. For example, on invasive non-native species (INNS), the current situation is: "As of February 2020, there are 4300 invasive species records held by the Local Records Centre for the Park Area", and the intended improvement is: "No instances of INNS reported for the Park", although there is no date given for achieving this. There are also similar types of statements on water quality, particulates, carbon emissions, and farmland birds (although unfortunately a typo means that the statement on the current situation for farmland birds (30% in decline of farmland birds from 1994 to 2018) has been replicated as the intended improvement).

Image: **RSPB Stumpshaw Fen by Harriet Gardiner**

Many of the other Plans only include a single piece of data on one of these topics, for example, the only relevant information in the Dartmoor Plan is that it currently has around 12% woodland cover.

Sometimes there is relevant information available in other published reports such as State of the Park reports, but it has not been included in the Management Plans. For example, there is some useful baseline information for the Yorkshire Dales in a separate 'Wildlife Evidence' report which includes data such as "47% of sampled rivers and 17% of waterbodies are rated as in 'high or good' ecological status under the Water Framework Directive". But none of this type of information has been included in the Management Plan itself so, even though the Plan includes targets across all three topics, it is not easy for someone reading the document to understand the scale of action required to achieve the target of at least 90% of all rivers being in "good ecological status" by 2027. It should not be necessary for readers of the Management Plan to search elsewhere for baseline information.

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, making it impossible to understand the kind of impact they are hoping to deliver. **All Management Plans should include relevant baseline information (e.g. on the state of habitats, species and water quality at the start of the Plan period). Key information should be clearly set out in the Management Plan itself and not in separate reports.**

From the discussions we held with NPA officers, it is clear that there are many challenges to securing appropriate baseline information. As we have discussed already in Section 3, there is a lack of data made available to National Park boundaries. Officers highlighted issues such as the lack of a monitoring regime covering the whole of the National Park, meaning that

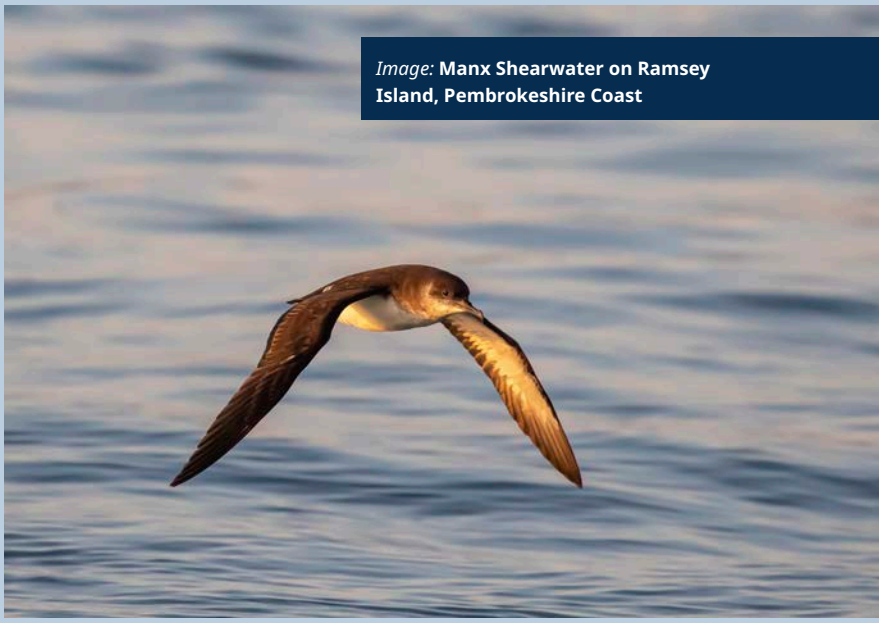


Image: **Manx Shearwater on Ramsey Island, Pembrokeshire Coast**

while there may be some good information, for example, from Local Environmental Record Centres, they might not be able to include the same information for the whole Park. Others mentioned the fact that budget cuts in recent years have prevented them from undertaking surveys that had previously been undertaken on a regular basis.

During this research we have become aware of the large-scale habitat surveys undertaken by both NE and NRW. Unfortunately, these surveys don't currently include a significant number of samples from National Parks to allow the data for these areas to be identified separately. **NE and NRW should make it clear that Management Plans need to include relevant baseline information and should ensure that data on habitats, species and water quality in National Parks is collected and made available to NPAs on a regular basis to allow this to happen. In particular, the existing programmes of habitat surveys in both countries should be supplemented with additional samples from within National Parks to allow for sufficient data to be provided for these areas.**

Targets: ambition for nature included in the Plans

Many of the Plans include ambitious statements about what they are intended to deliver for nature. For example, "our aim is to create healthy peatlands across the Park" (Bannau Brycheiniog) or "Habitats are in good condition, expanded, connected, and support a greater abundance of species" (Exmoor). These are important statements of intent on nature recovery but without more specific details, such as the size of area to be improved by a certain date, they are better described as ambitions rather than targets. Others set out a clear target but with a long timeframe e.g. "increase the area of native woodland within the National Park by 50% by 2050" (Eryri). Without milestones to provide an indication of the level of progress in the short-term, these kinds of targets are also of limited value as it will take too long to judge whether or not they are being achieved.

Specific, timebound (ideally to the end of the Plan period) targets are needed in order to be able to judge what impacts the actions in a Management Plan are having. Yet, **3 out of the 13** Management Plans (Exmoor, Pembrokeshire Coast and the South Downs) contain no specific, timebound targets at all. All three of these Plans include broad objectives instead, which do not include any details on the timescale for delivery or the extent of change which will be delivered. For example, the South Downs Plan has an objective "to create, restore and improve areas of priority habitat to be more, bigger, better, and joined up at a landscape scale".

It is stated in the South Downs Plan that it will be monitored by tracking progress against a set of overarching indicators, but the indicators referred to are not included in the Plan. When asked about this, NPA officers explained that the more specific targets are included in their Corporate Plan[107] instead. For example, the Corporate Plan includes a high-level target "to secure an additional 13,000ha, or 33% of land managed for nature by 2030 from a baseline of 25%". Officers explained that they had taken this approach as it is much harder to identify what the Management Plan is delivering given that so much of it is dependent on other partners. This indicates the weakness of the then requirements on other bodies to contribute to the delivery of the Management Plan, something that should be addressed in future as a result of the new requirements in the LURA 2023. Although, as other Parks have included targets in their Management Plans, it appears that this has been less of a concern elsewhere.

There are other examples of where effective targets have been agreed but not included in the Management Plan, because they 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. A number of the other National Parks including Bannau Brycheiniog and the Yorkshire Dales have now published Nature Recovery Plans or similar documents such as the Broads Biodiversity Plan. Any targets in these Plans are not necessarily included in the Management Plan making it harder to hold partners accountable for their delivery.

There are some good examples where nature targets are easy to find (and we would encourage other Parks to look to adopt similar approaches). For example, the targets in the Lake District Partnership Plan are all included in sections entitled "our measures of success" for each of the different topics covered.

One Plan – The Pembrokeshire Coast Plan – purposely does not include any targets, stating that: "Landscapes are dynamic, and knowledge, perceptions and expectations about them will change. For this reason, the Management Plan does not set outcome targets. Instead, it sets out a range of desired policy impacts which will be used to evaluate the direction and rate of travel over the Plan period. Progress will be assessed through annual reports and State of the Park reporting." However, this argument seems weak in the light of the fact that most of the other Plans do include targets of some description.

Only one Plan – that for the Yorkshire Dales – includes specific, timebound targets for habitats, species and water quality. These include for example, on habitats: "all the blanket bog in nationally and internationally important wildlife sites is 'recovering' and 50% of the other land in such sites has reached 'favourable' condition by 2024", and on species: "Work with farmers and landowners to achieve and maintain stable or increasing populations for 90% of priority species by 2026, including the UK 'red-listed' upland birds". These targets are also clearly set out and easy to find in the Management Plan. If it is possible to develop and agree targets like this for one National Park, it should be possible to develop equivalent targets for all 13.

The Yorkshire Dales Plan also includes the following target on wildlife crime: "Work with moorland managers and other key stakeholders to devise and implement a local approach to end illegal persecution of raptors, including independent and scientifically robust monitoring, and co-ordinated hen harrier nest and winter roost site protection." None of the others include a target on this topic. While it is clear that wildlife crime shames the Dales[108], and arguably, some of the Parks do not feel that there is any need for a target in this area, as we have shown in Section 4, there are at least two other Parks (the Peak District and the North York Moors) where raptor persecution is a significant issue. It would therefore be appropriate to have a Management Plan target relating to this in those other Plans too.

CASE STUDY: Exmoor Nature Recovery Vision

In November 2020, Exmoor NPA adopted a Nature Recovery Vision which aims to ensure that at least 75% of the National Park is in 'nature-rich' condition by 2050 and to increase the areas protected for nature in line with the 30x30 target. The specific targets for 2030 include:

- Bringing 95% of existing wildlife areas into 'favourable condition' (38% of the National Park). 85% of SSSIs in the National Park are currently in 'unfavourable' or 'unfavourable recovering' condition.
- Creating or restoring an additional 4,500 ha of priority habitat as 'nature corridors and buffers', especially to expand and link the nature-rich hubs and to create a web of connectivity (6.5% of the National Park).

There are also specific targets for other types of habitat, such as new woodland or wood pasture and hedgerows.

There is an interactive illustration on the NPA's website demonstrating what a more nature-rich Exmoor would look like.

There are other examples of good targets for at least some of the other topics (habitats, species, water quality):

- The Dartmoor Plan has several specific, timebound targets for habitat restoration, such as, "restore an additional minimum 1000 hectares of priority blanket bog by 2026".
- Similarly, the New Forest Plan includes a number of specific targets for the restoration of different types of habitat, including "5,000 hectares of priority habitats brought into active management".
- The North York Moors Plan includes specific, timebound targets for both habitat restoration and water quality, for example, "achieve good ecological status on at least 40% of water bodies by 2027".
- The Northumberland Plan includes a wide range of targets relating to habitat restoration (and a helpful map indicating where these will be focused). Targets include "5,000 hectares of peatland habitat under restoration by 2030", "remove or restructure 2,000 hectares of commercial coniferous forest by 2030 to achieve nature, climate and landscape enhancements", and "enhance a further 150 hectares of hay meadow grassland to improve species diversity by 2030".

All Management Plans should include specific, timebound targets for addressing nature recovery. These should be clearly set out and easy to find in the main Management Plan document.

Assessing progress on nature recovery

Progress on the delivery of Management Plans is assessed and reported in a variety of ways.

Some NPAs produce State of the Park (SotP) reports. For example, in the Peak District the most recent SotP report[109] is from 2021 and provides a comprehensive overview of the range of species and habitats found in the Park, but there is a strong emphasis on the lack of data available. There is a document available which reports on overall progress on the previous Management Plan[110] but this mainly focuses on setting out actions delivered and provides little detail about progress on targets.

In general, the contents of SotP reports are not always directly related to the contents of the Management Plan and they sometimes contain very little data of relevance to nature recovery. A further issue is that some NPAs have not produced a SotP report for some time now, for example, the most recent SotP report for Eryri is from 2015 and the South Downs NPA has not published one since 2012.

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. For example, Exmoor monitors progress at the mid-point of the Plan period, while others only do so in preparation for development of the next Management Plan.

Monitoring reports have subsequently been published for a number of the other Management Plans, including Eryri, Lake District and the North York Moors, but at the time we completed our initial analysis in summer 2023, there had only been an effective assessment of progress towards delivering the Management Plan in one National Park. Here again, it is the Yorkshire Dales leading the way with the publication of an annual progress report and a section on the NPA website which includes pie charts showing how many of the Management Plan objectives have been achieved, are on course etc. However, even here there are opportunities for improvement. In order to identify what progress has been made against individual targets, it is necessary to click through several links on the website and it is not always clear what plans are in place to improve progress where targets are not being delivered.

The most recent assessment for the Yorkshire Dales Management Plan[111] concluded that the only area where targets were on course to be achieved was in relation to water quality, although it also states that only 62% of rivers in the National Park are of good quality against a target of 90% by 2027 (this compares with a national average of only 14%). The assessment concluded that there had been some progress against the targets for wildlife crime and habitat restoration. In March 2022, 95% of the blanket bog in nationally and internationally important wildlife sites and 42% of other habitats was classed as 'recovering', (against targets of 100% and 50% respectively). It is noted that both these figures are unchanged since 2018. It was concluded that there had been little or no progress on species recovery and the report quotes data from the Yorkshire Dales Biodiversity Forum's 2021 *Trends and Status Report* that showed that 76% of priority species had populations that were either stable or increasing against a target of 90% – down from 81% in 2016.

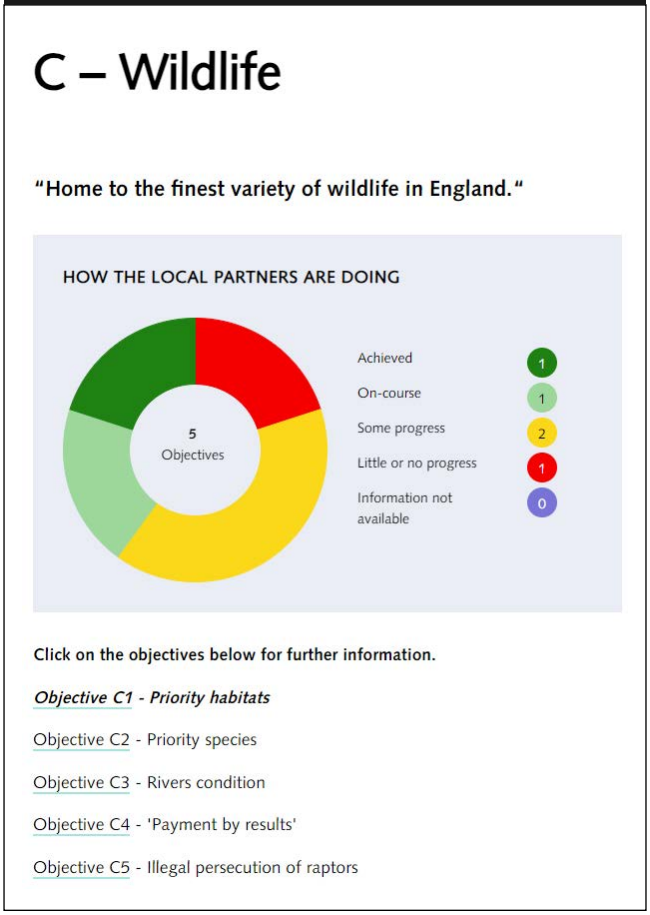
The only other Park where there is any kind of assessment of progress for the current Plan is Exmoor which published a mid-term progress report for their Partnership Plan in November 2021. However, although this discusses progress on implementing the various aspects of the Plan in general terms, there is a lack of specific detail on progress towards nature recovery which is not surprising, given the lack of specific targets in the Management Plan.

Image: **High Borrowdale, Lake District**

CASE STUDY: Yorkshire Dales Management Plan Progress Report

The Yorkshire Dales Management Plan partnership publishes an annual report setting out progress against each of the 49 objectives in the Plan. Reports dating back to the start of the current plan period in 2019 are available online[112], making it possible to assess how things have changed during this period.

Each report includes a summary of overall progress and a list of significant achievements and highlights those objectives where there has been little or no progress. Further details of the progress on each objective are also available on the NPA's website[113] which includes a series of pie charts illustrating the number of objectives which have been achieved overall and for each of the six areas covered in the Management Plan including wildlife. The website also includes details of what progress has been made and links to related articles for those interested in finding out more.



Some of the others have old monitoring information available in the form of annual progress reports for the previous Management Plan. For example, Dartmoor NPA produced annual progress reports in the past but has not published one since 2019. At the time we completed our initial analysis **11 of the 13** had not published any kind of assessment of progress on delivering their current Management Plan.

Annual progress reports should be published for all the Management Plans, setting out progress against a set of specific, timebound targets and, where a lack of progress is identified, these reports should also set out what further actions are planned to ensure the targets will be delivered.

The delay in producing updated guidance, combined with having to wait for the Outcomes Framework in England, seems to have had an impact on some NPAs' ability to set targets and monitor progress, as part of recent reviews of their Management Plans. For example, the Broads Plan cites the need to wait for the publication of the new national indicators for Protected Landscapes as a reason for not having updated the dataset that would usually be used to assess changes over time.

Both the English and Welsh Management Plan guidance contains a set of principles to guide the process of plan preparation and help determine what the plans should contain including a checklist of topics to address and recommendations for setting SMART objectives wherever possible. However, there is no set format that the Plans must follow and, in any case, the current guidance is non-statutory. These factors, combined with the lack of up-to-date guidance, mean that there is a wide variety in the style of Management Plans produced and the approaches taken to developing them. While there are good reasons for the content of these Plans to vary to take account of local circumstances and the priorities of local partners, there is a need for clear guidance in order to ensure that there are effective and ambitious Plans in place for all the Parks. Requiring the Plans to address several specific topics, and to include a clear set of targets and objectives for each of those topics, would also make it easier for the general public and external stakeholders to understand what actions are proposed and to hold partners accountable for the delivery of those actions.

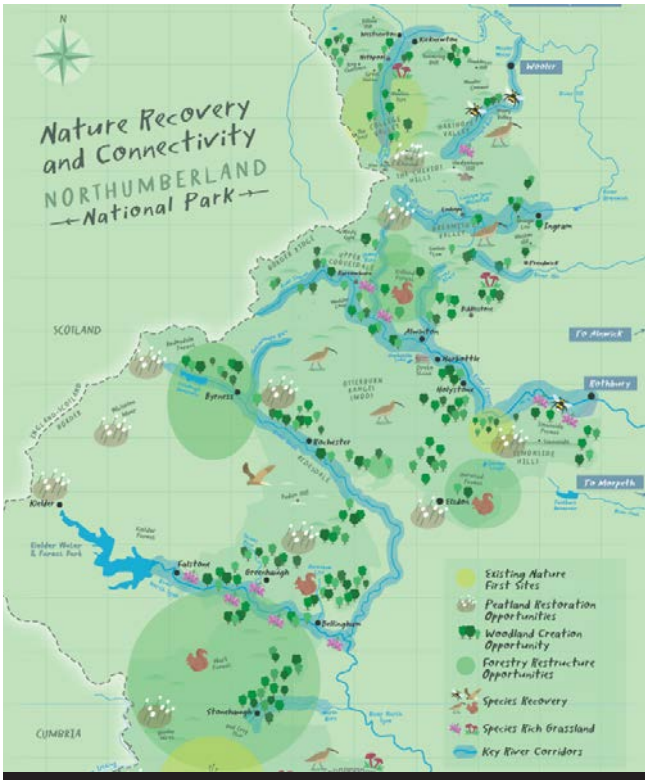
NE and NRW should publish updated Management Plan guidance as a matter of urgency. This should set out what Management Plans should contain, how progress on them should be assessed and how that progress should be reported. This guidance should be statutory and should be reviewed and updated at least every five years.

CASE STUDY: Bannau Brycheiniog's overall approach

While this Plan could have been made even stronger through the inclusion of more specific, timebound and challenging targets, it is an excellent example of an ambitious and comprehensive Management Plan which clearly sets out both the scale, and wide range, of actions that are needed, as well as highlighting the importance of working in partnership to deliver these actions. The Plan has clearly been drafted with the aim of inspiring action by all relevant partners and the Executive Summary makes it absolutely clear that publication of the document is far more than just the fulfilment of a statutory obligation: "It is a Plan which seeks to clearly and unashamedly articulate the need for widespread and urgent change if we are to survive as a resource for future generations. It is a plan which aims to inspire action and build a coalition of the willing."

The Plan adopts what is described as a 'Mission approach' with five interconnected missions focussing on the main challenges for the Park which are underpinned by overarching objectives developed in collaboration with key partners and which are intended to be delivered through action plans.

The Plan also starts with a helpful introductory section which includes some key information about the National Park and the NPA's role and responsibilities. Importantly, this section includes an explanation of the requirements on other public bodies with regards to National Parks and lists some of the bodies to which these requirements apply, such as Natural Resources Wales, Welsh Water and the local authorities in the area.



CASE STUDY: Northumberland Nature Recovery and Connectivity Map

The Northumberland Management Plan includes a good map which clearly sets out the areas of the Park which will be the focus for different types of nature recovery opportunity such as peatland restoration, woodland creation and key river corridors. There are similar maps for other key aims of the Management Plan such as climate actions, welcoming visitors and supporting thriving communities. Ideally, it would be good to have one map which shows how these different aims relate to each other spatially, but the individual maps are all very effective.

Image: **Dawn Brown**

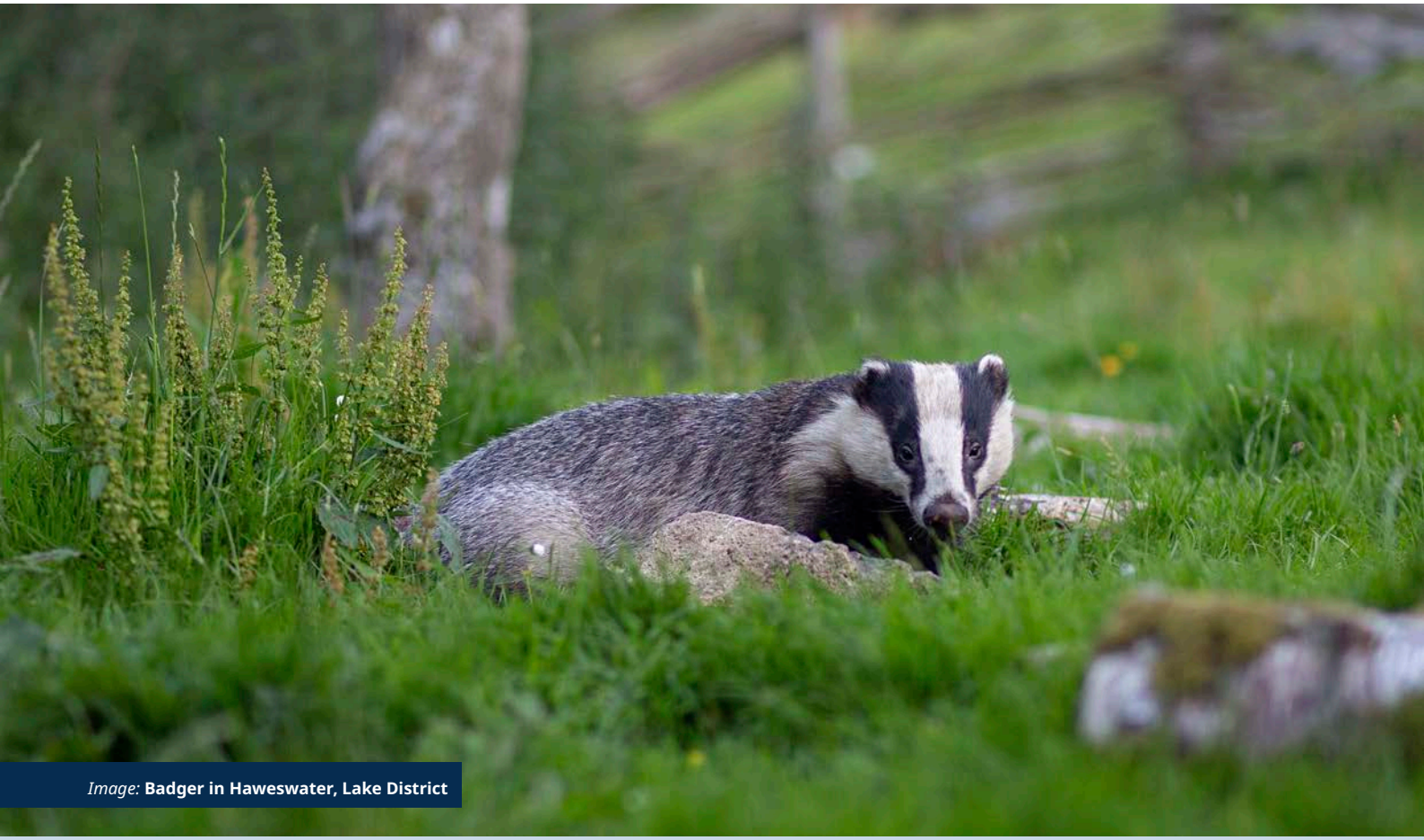


Image: **Badger in Haweswater, Lake District**

Do NPAs have the capacity they need to deliver on nature recovery?

This section is based primarily on the responses to a series of questions that we sent the NPAs by email in September 2023. We received responses from 12 of the NPAs.

How many NPA Board members have expertise in nature recovery?

- One NPA identified four members who were actively involved in nature recovery schemes e.g. through an interest in woodland or as nature-friendly farmers.
- Two NPAs said they had three current Board members with expertise in nature recovery.
- Most of the rest said they had one or two.
- Vast majority of NPA members with nature recovery expertise are national (Welsh Government or Secretary of State) appointees.
- Many other Board members have skills in related areas, for example, one NPA said that in addition to two SoS appointees with nature recovery expertise, they had six with land management expertise which included elements of nature recovery, only one of which was a national appointee.

How many NPA staff have some responsibility for nature recovery?

- One NPA said nature recovery is embedded in a wide number of roles in the organisation including planning teams, ranger teams, education team, property team and the communications team.
- Another said that they considered the vast majority of staff work to support nature recovery as it is one of the NPA's core functions and that staff across communications, marketing, information centres and enabling services, such as finance and HR, all support nature recovery.
- While the emphasis on nature recovery being a core element of roles across the organisation is very welcome, as this should ensure that it is embedded in all the NPA's activities, there is still a need for NPAs to have sufficient staff with specialist expertise in areas such as ecology if they are going to be able to deliver nature recovery effectively. Of those that did provide a specific answer to the question most had only one or two ecologists.

SECTION 6.
WHY IS SO LITTLE PROGRESS BEING MADE ON NATURE RECOVERY IN NATIONAL PARKS?

Image: **Ullswater Boathouse, Lake District by Kieran Metcalfe**

As the case studies we have included earlier in this report demonstrate there are some excellent examples of nature recovery already happening in the National Parks, but it is also very clear from our analysis of the data that far more needs to be done. There are a range of reasons why there is far less progress on nature recovery in National Parks than might be hoped and expected. Some of these are the same factors that apply more generally across the country. *The State of Nature 2023* report[114] identifies the biggest causes of wildlife decline being the way we manage our land for farming and climate change. These wider issues will need to be addressed in order to support nature recovery in National Parks. There is now a growing body of evidence about how these issues can be addressed, including the evidence in the *State of Nature* Report and the case studies in this report.

As the evidence in Section 4 shows, significant changes are needed to restore the peatlands, woodlands, waterways and Protected Areas in National Parks back to good health and ensure these areas can contribute far more to delivering the 30x30 target and become the wilder places that the public want. It is also clear that, while there are many similarities between the situation in England and Wales, there are a number of differences between the two countries, and hence a number of areas where the changes needed are likely to be different. For example, our analysis suggests that Welsh National Parks are contributing far less towards national targets on woodland coverage than National Parks in England are.

From our conversations with NPA officers, Board members, expert members of our Council, combined with the analysis and evidence from our research, we have identified three underlying issues preventing more progress on nature recovery:

A 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.

The expectation is that the Plans are developed, and implemented, in partnership with these other organisations and that they are Plans for the National Park rather than just the NPA. The importance of the involvement of other organisations is reflected in the fact that a number of the Plans are now called Partnership Plans. However, it seems that the contribution of the other members of these partnerships is one of the factors currently limiting progress on nature recovery actions in the Management Plans.

As one NPA officer described, there's a need to focus on a "coalition of the willing". This kind of relationship-building takes time and resources.

There was clearly a lot of concern 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. 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. Some NPAs have chosen instead to focus more on what they can influence directly e.g. focusing on targets and indicators in their Corporate Plan. There were also references to the difficulty of monitoring progress when relying on the input of other partners. Concern was also expressed by some NPAs that the statutory bodies don't necessarily think in terms of National Park boundaries when producing their own plans and strategies, such as the Area Statements produced by NRW.

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 officer we spoke to was very open about the fact that the nature-related targets in their Management Plan are not currently being met but emphasised the need for changes at a national level to address issues such as water quality, SSSI condition etc. 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 put it, "We know what the problems are, we know what the solutions are, but to deliver, national policy changes are required."

Image: **North Hill, Exmoor by Harriet Gardiner**

Image: **Marsh Fritillary by Lourdes Photography**

B National 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 founding legislation was clear that the conservation of nature was always an accepted purpose of a National Park, but the two main ways NPAs have for delivering this are their role as planning authorities and through their responsibilities for Management Plans. As our research showed, the latter has significant limitations which has left NPAs with planning powers as their main mechanism for influencing what happens in their area. This set the NPAs on a very clear course, and their leadership and culture grew to support this. It is clear this legislative framework has failed and much of the wealth of natural beauty for which National Parks were first designated has been lost. As we acknowledge elsewhere, it is likely that nature would be in an even worse state if these areas had not been protected but there is now widespread recognition of the limitations e.g. the Welsh Government has acknowledged[115] that National Parks "are not currently managed effectively for biodiversity as a result of their original designation."

There is an urgent need for changes if our National Parks are to play their role in helping deliver crucial international 30x30 targets on nature recovery. There is also a huge expectation from the public that these areas should be wilder and nature-rich.

The National Park primary purpose is to conserve and *enhance* wildlife, natural beauty and cultural heritage. Supporting communities to steward the land, as they have done for generations, is absolutely critical to nature recovery. The challenge is to support communities 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. Restoring nature and restoring the traditional, low intensity management practices that shaped these landscapes over millennia (such as hay meadows, low intensity cattle grazing, coppicing and traditional orchards) will need to go hand in hand. Historic intensive land management and damaging practices, such as the draining, burning and afforestation of peatlands, under *and* overgrazing, 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, rewilding and the re-introduction of keystone species such as beavers. For rural communities to thrive and prosper, requires a careful and just transition.

Ensuring all this happens will require significant changes to 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. Our findings suggested the leadership culture in some NPAs needed to be much more vocal and ambitious for the scale of change required. Both officers and members will need to be more vocal and assertive about holding others to account, including public bodies. This should include pushing for the changes to national policy that are needed as set out elsewhere in this report and being unafraid to speak up in favour of potentially controversial, but essential, measures such as species re-introduction and rewilding, alongside critical measures such as regenerative agriculture.

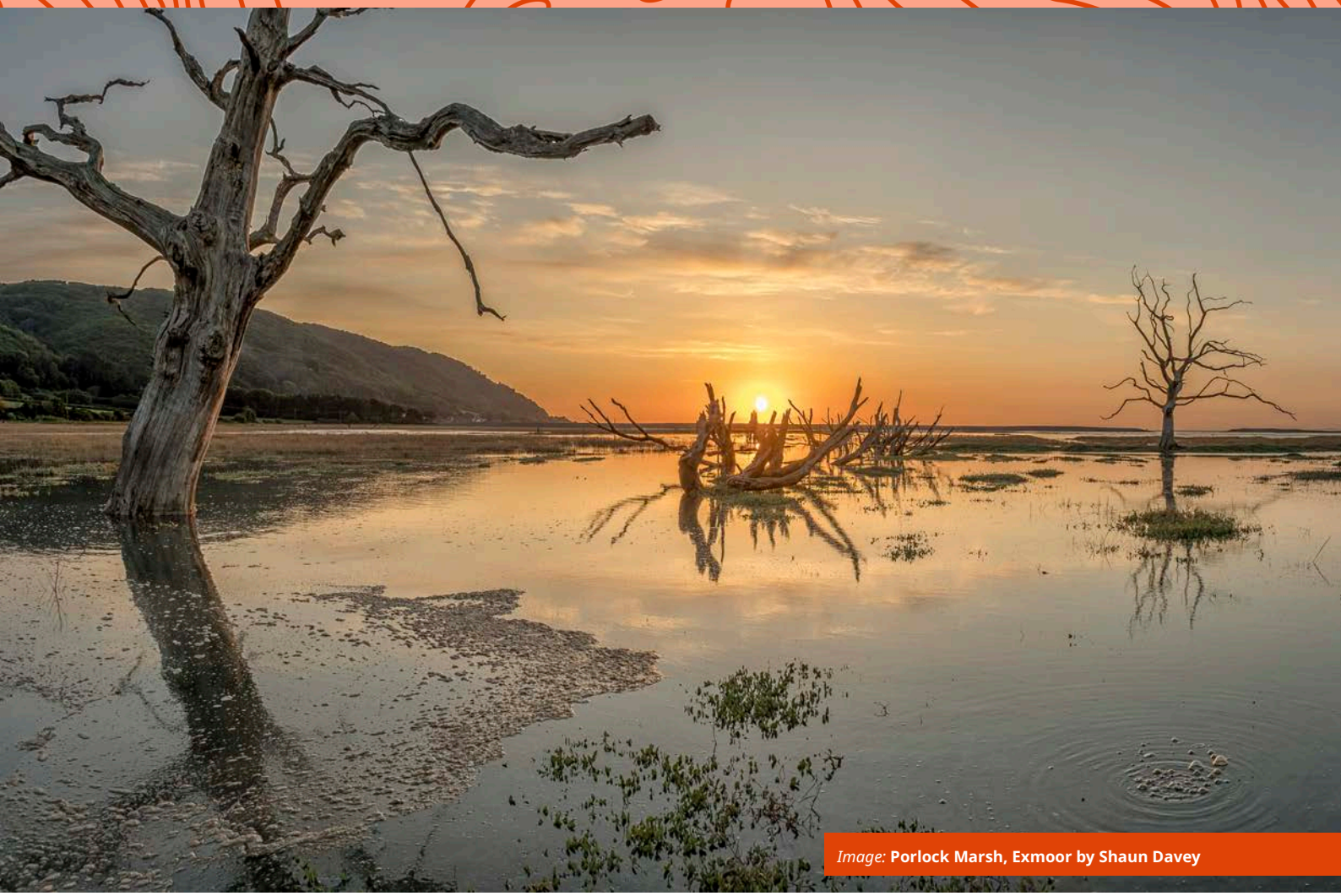


Image: **Porlock Marsh, Exmoor by Shaun Davey**

NE, EA and NRW have a crucial leadership role to play too, 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 that lack of enforcement action is a particularly 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.

There are already some great examples of landscape-scale nature recovery happening in National Parks, but we need many more of these. As Sir John Lawton has recently highlighted[116], it is landscape-scale delivery that makes the real difference when it comes to nature recovery.

Through their second purpose responsibilities to support enjoyment of the Parks, NPAs also have an important role to play in helping residents and visitors understand the changes needed to support nature recovery. There needs to be more discussion about the best way of supporting a range of habitats and species and that this may require changes to the appearance of the Park, and to features that people have become familiar with. For example, peatland restoration may require the removal of trees that have been planted in inappropriate locations in the past.

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

Most of the NPA officers we spoke to identified the main barrier to making progress as being a lack of resources for both the NPA and the other partners involved in delivering the Plan. In the view of one officer, the funding available does not match the national role that National Parks are expected to deliver on greater nature recovery. Another suggested that targets cannot be meaningful when you do not have the resources to deliver, and highlighted the difficulties caused by the stop-start nature of much of the funding that is available. Budget cuts in recent years have also had an impact on the monitoring that NPAs are undertaking. In one case, this meant that an NPA was no longer able to repeat a survey that had been carried out every five years since 1979; the last year it was undertaken was 2014. A lack of resources is also having a huge impact on the statutory monitoring undertaken by NE, NRW and EA.

From the available data on NPA spend on nature recovery, it is clear that this represented a small fraction of overall budgets in 2022/23. NPAs have seen a significant drop in their budgets in real terms in recent years and this has affected their ability to deliver certain areas of work. While some have been very successful at securing project funding from private finance and other sources, this in itself requires additional resources, and project funding is often short-term, making it hard to retain skilled and knowledgeable project staff or make sustained progress. NPAs' 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.

NPAs will need more resources if they are to take full advantage of the new powers that are needed to give them more influence over what happens in National Parks, and to take the other actions needed to deliver effective Management Plans. 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. Other public sector organisations, particularly EA, NE and NRW will need more resources too if they are to contribute more effectively, including by undertaking more regular monitoring and sharing the results of that more widely.

In all cases, the allocation of additional resources should be clearly linked to the need to demonstrate progress on nature recovery. This could be along the lines of the remit letter[117] which the Welsh Government provides to the NPAs setting out the priority objectives and actions they are expected to provide in return for funding. However, there should be a move away from relying heavily on competitive approaches to allocating funding which penalises smaller NPAs and results in a lot of resource being used on securing funding rather than delivering outcomes on the ground.

The majority of land is grazed to produce food, with extent and stocking density reflective of various policies and incentives over the last 75 years. 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.

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Image: **As You See It Media**

CASE STUDY: Our Food 1200, Bannau Brycheiniog National Park

Our Food 1200 is working to secure 1200 acres of land across Bannau Brycheiniog National Park, Powys and Monmouthshire for modern regenerative horticulture, creating a network of small-scale commercial fruit and veg farms serving local communities. This scale of change will be transformative in building a vibrant low-carbon local food economy that reconnects people with the landscape and helps tackle the growing issue of food security. However, profit margins in this type of farming are extremely tight with very modest incomes for business owners. Small scale fruit and vegetable farmers are often not eligible for agri-environment subsidies despite the huge range of positive outcomes for communities, nature and green jobs.

CASE STUDY: FiPL funding aiding nature recovery in the Lake District

Using FiPL (Farming in Protected Landscapes) funding Hall Farm in Rusland, Lake District, have focused on re-instating field boundaries, planting new or managing existing hedges and fencing off watercourses. Funding was used for grazing management advice to look at the optimum ways of splitting up the farm for rotational grazing, all with the aim of increasing farm profits and enhancing landscape, biodiversity and soil health.

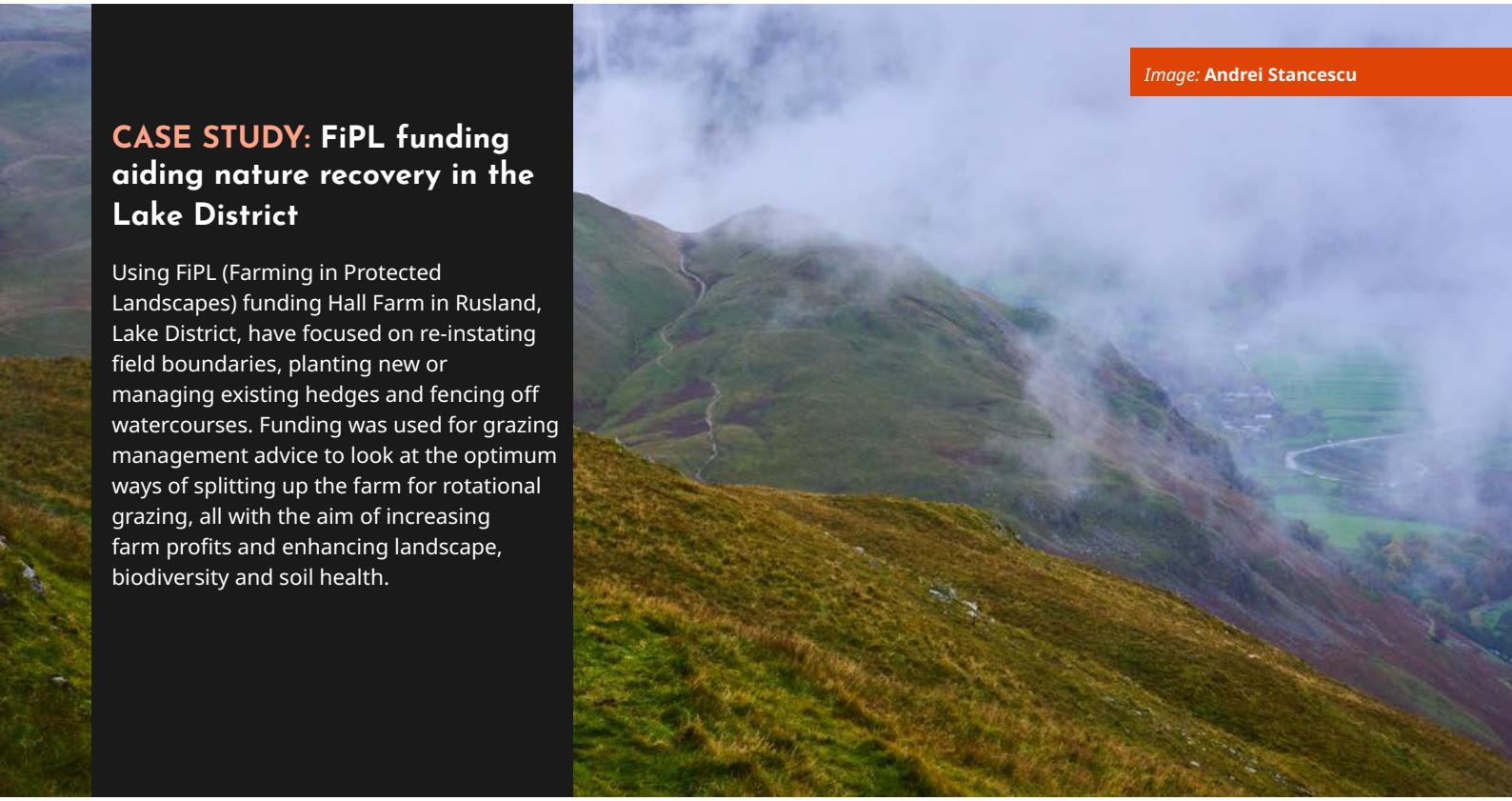

Image: **Andrei Stancescu**

Historically, as 'low value' agricultural land (and contributing a small proportion of 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 should be reversed given the significant value in terms of natural and cultural heritage.

As the Foundation for Common Land[118] suggests, sustainable grazing regimes are costly, and farm business incomes will significantly decline as basic payments are phased out. There is real concern that the new schemes (Environmental Land Management in England and Sustainable Farming Scheme in Wales) will not fully compensate this loss for many farmers and land managers in National Parks. There is an urgent need to ensure payment rates reward the multiple benefits National Park land managers provide to safeguard nature and rural livelihoods.

In England, the Landscape Recovery Tier of new Environmental Land Management (ELM) and Farming in Protected Landscapes (FiPL) offer two different and valuable models to scale up targeted incentives. FiPL was cited by

There is an urgent need to ensure payment rates reward the multiple benefits National Park land managers provide to safeguard nature and rural livelihoods.

NPAs as providing a good basis to engage with land managers and to discuss opportunities for particular types of habitat improvement. The £100m funding committed to FiPL for distribution between 2021 and 2025, has enabled the investment in local advice through dedicated project officers. Defra's recently published interim evaluation of FiPL[119] found that NPAs felt that the scheme had helped them deliver strategic objectives, such as Management Plan targets. The short-term nature of the funding currently hinders potential to deliver maximum returns for nature, as it favours quick wins such as fencing. Questions have been raised in terms of panel membership and scrutiny (which has been variable across the Parks) and tight alignment with Management Plans.

SECTION 7.
REFORMS FOR HEALTHY NATURE IN NATIONAL PARKS

Image: **Llangorse Lake, Bannau Brycheiniog by Will Davies**

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 National Park Authorities and others, things could be much, much worse. As noted in the *State of Nature 2023 Report*, 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.

Image: **Daove Stone, Peak District**

Image: **Cranes on Sutton Fen, Broads**

Reform no. 1.
Make it clear: National Parks are for nature.

Landscape designations are nature designations. Nature is a crucial part of landscape, and it's time that this was recognised clearly by Governments and agencies responsible for 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. 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.

In England and Wales, 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 England, 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 in law for public bodies, including water companies, Government departments, Forestry England, NE, EA and NPAs. Statutory guidance should be updated in England to ensure preparation of Local Nature Recovery Strategies are fully aligned with Management Plans. In Wales, the State of Natural Resources Report, and Area Statements required under the Environment (Wales) Act, 2016, should feature National Parks as a priority. New National Parks in England and 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.

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. Natural England, Natural Resources Wales, the Environment Agency and the Joint Nature Conservation Committee are Government bodies responsible for nature. Forestry England and Ofwat also have critical roles. Given the importance of National Parks to achieving the 30x30 target, these agencies should collectively place greater emphasis on the condition of habitats and species across the National Parks. It is critical that they have sufficient resources to enable them to carry out operations and regulatory roles, with the enforcement that is clearly necessary, with a focus on National Parks.

Some **National Park Authorities** have already make clear, ambitious and demonstrable commitments to driving the changes needed to secure nature recovery. We encourage all of the NPA Boards to embrace this. We'd like to see all NPAs advocating for the necessary changes in policy and practice that their extensive expertise and experience shows are needed. There should be greater emphasis on nature recovery in all decision-making, including planning decisions and enforcement, all members need 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 creating new ways for nature and communities to thrive together. It is clear that investment is desperately needed to scale up these practices and support nature and communities to thrive.

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[120]: 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"[121] 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. Given there is precedent (e.g. 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 given the importance of these landscapes in delivering the Government's agenda in the long-term.

The NPA core annual grant (£65m in 2022/23 for the 13 Parks) is often 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 all this investment with Management Plans in order to realise the £1bn investment estimated to be needed for nature recovery in National Parks.

Farmers and land mangers 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 landscape-scale recovery and supporting farmers to adopt practices to enable nature recovery. These schemes provide proper long-term assurance and support to encourage investment in the kind of changes in practice needed to deliver 30x30. There should be a just transition supporting farmers and land managers, in the uplands in particular, to adapt to the phasing out of basic payments, and adoption of land management practices that will drive public goods. This is critical to retaining the rural communities and cultural heritage that make National Parks so special.

Support should 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. Rewilding should be recognised as a legitimate and potentially beneficial land management choice, rewarding landowners and managers who voluntarily wish to adopt it where it is an appropriate management choice for nature recovery.

Agri-environment support should be specifically designed to enable NPAs to develop close relationships with farmers and land-managers. In England, Environmental Land Management (ELM) should scale up funding available via the Landscapes Recovery tier to deliver large-scale collaborative agreements across every National Park. The Farming in Protected Landscapes (FiPL) scheme should be scaled up and given long term security, with NPAs empowered to make decisions aligned with Management Plans. In Wales, the Sustainable Farming Scheme needs to give assurances to farmers that collaborative and optional nature-friendly

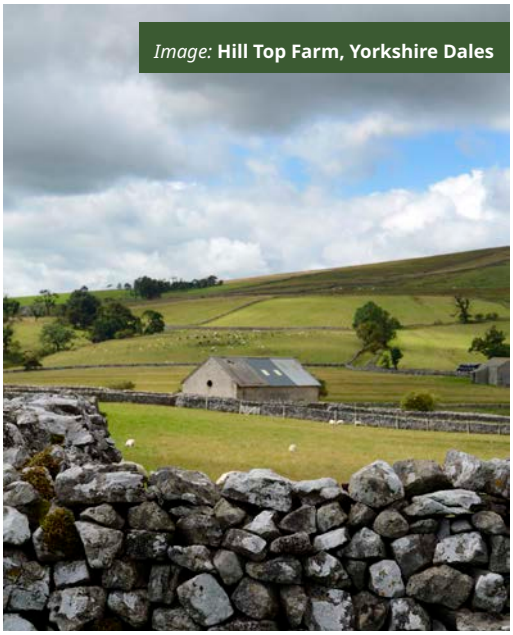

Image: **Hill Top Farm, Yorkshire Dales**

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 nature recovery. Given the early success of FiPL including significant support from farmers and land managers, Welsh Government could pioneer its own NPA-led approach to bespoke support in line with Management Plans.

Public bodies, such as Forestry England, National Resources Wales, the Ministry of Defence, and water companies must align investment for nature recovery in National Parks. 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. This should unlock significant investment, for example, it should directly result in greater water company investment in National Park water bodies. 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, 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*[122122] is not enough to drive the scale and pace of change needed.

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 ordinance can add to the cost; the forestry bodies 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 reduce pollution and comply with high standards across all National Park waterways.

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. 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 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 for nature. Ultimately, the 'New Deal' for National Parks must provide the incentive framework to drive change. Underpinning this, new powers are needed, alongside enforcement and proper implementation of existing laws.

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. This includes controlling activities that are evidently damaging SSSIs, including sewage pollution, burning, inappropriate levels of grazing or use of pesticides, fertilisers or other chemicals.

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 the EA or 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.

Planning conditions imposed by NPAs should be enforced and swifter action taken when planning laws are breached. NPA planners refusing permission, or taking enforcement action, for activities that would damage nature (such as intensive poultry production, or tracks over moorland) should ensure all decisions are implemented quickly.

It is clear that good regulation and successful compliance is completely dependent upon sufficient staffing at regulators, to advise and to ensure decisions are based on transparent 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 secure compliance for SSSIs and water bodies, by including outcomes in their Management Plans and helping facilitate the process through advice and relationship building.

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 the Levelling Up and Regeneration Act 2023. This should include requirements to test if a plan or project could significantly harm or hinder wildlife or natural beauty, or delivery of the Management Plan, with a new accountability mechanism, empowering the NPA to refuse permission and ensure sufficient contributions to deliver for nature 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.

Image: **Young wilders, Hepple Estate, Northumberland**

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 for every citizen to walk, completely immersed in nature, surrounded by the awe and wonder of our most special landscapes and wildlife. This vision still resonates. A new People's Charter should renew the social contract for National Parks, setting out what nature needs, what communities need, and what society needs. This should be 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 citizen's assembly in each National Park to inform the Management Plan. This would build connections and understanding across different constituencies, bringing together land managers, owners, 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.

Image: **Participatory democracy in Bannau Brycheiniog**

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 this is something that all of us – citizens, land managers, scientists, charities, NPAs and others providing key data – can help address. 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 England's Natural Capital Ecosystem Assessment, 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, the Environment Agency 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.

- 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 other key research institutions.

- 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, and working with international partners including the IUCN and Europarc to learn from Protected Areas 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 big 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 that these special places deliver for nature, people and climate long into the future.

ENDNOTES

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[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-five-britons-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)

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[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

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[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-park-management-plan/c-wildlife/

[21] Landscapes Review (2019)

[22] Throughout this report, reference to National Parks also includes the Broads.

[23] https://stateofnature.org.uk/

[24] https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today

[25] 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.

[26] https://www.cbd.int/gbf

[27] https://www.iucn.org/resources/factsheet/conserving-least-30-planet-2030-what-should-count

[28] https://www.gov.wales/sites/default/files/publications/2021-07/woodland-creation-wales-report_0.pdf

[29] https://iucn-nc.uk/projects/ncuk-expert-working-groups/pawg/

[30] https://www.britishecologicalsociety.org/wp-content/uploads/2022/04/BES_Protected_Areas_Report.pdf

[31] National Landscapes were formerly known as Areas of Outstanding Natural Beauty.

[32] https://www.wcl.org.uk/assets/uploads/img/files/WCL_2023_Progress_Report_on_30x30_in_England_1.pdf

[33] This figure is based on the proportion of SSSIs in National Parks assessed as being in 'favourable' condition and does not take account of the fact that there may be land in National Parks outside Protected Areas which is well managed for nature, but for which there is no monitoring data available.

[34] https://www.gov.uk/government/publications/delivering-30by30-on-land-in-england

[35] A think piece on the effectiveness of protected areas in England – NECR412 (naturalengland.org.uk)

[36] Independent review of protected site management on Dartmoor – GOV.UK (www.gov.uk)

[37] https://greenallianceblog.org.uk/2023/10/11/the-public-thinks-national-parks-are-for-nature-but-does-the-government/

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[39] People want England's National Parks and AONBs to be richer in nature (wcl.org.uk)

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[42] Campaign for National Parks (1990) Wild by Design

[43] https://www.cnp.org.uk/news/raising-the-bar

[44] Data on land ownership in National Parks based on information provided by Guy Shrubsole, April 2021.

[45] https://www.plantlife.org.uk/wp-content/uploads/2023/12/Plantlife-Farming-Income-For-Semni-Natural-Grasslands-Report-FINAL-PDF-1.pdf

[46] There is further information about FiPL, including some case studies of the projects it has supported here: 0345-NPE-FiPL-report-2023-A4-WEB.pdf (nationalparksengland.org.uk)

[47] https://publications.naturalengland.org.uk/publication/5419124441481216

[48] Based on data from Natural Resources Wales / Peatland Data Portal Map Layers and England Peat Status GHG and C storage – data.gov.uk

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[50] Independent review of protected site management on Dartmoor – GOV.UK (www.gov.uk)

[51] https://www.iucn-uk-peatlandprogramme.org/sites/default/files/header-images/Strategies/UK%20Peatland%20Strategy%202018_2040.pdf

[52] https://www.gov.wales/sites/default/files/publications/2019-06/low-carbon-delivery-plan_1.pdf

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[55] https://publications.naturalengland.org.uk/publication/5419124441481216

[56] https://www.wcl.org.uk/docs/The%20Environmental%20Targets%20(Woodland%20%20Trees)%20(England)%20Regulations%20-%20Link%20and%20Greener%20UK%20briefing%2020.01.23.pdf

[57] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1168372/environmental-improvement-plan-2023.pdf

[58] https://www.gov.wales/sites/default/files/publications/2021-07/woodland-creation-wales-report_0.pdf

[59] The land cover data provided in Table 3.2 indicates that coniferous woodland makes up around 40% of all woodland. This difference is in part due to differences in the way the two sets of data are recorded, for example, the land cover data includes small woods (<0.5 hectares) and individual large trees which are not included in the NFI woodland categories above.

[60] https://www.woodlandtrust.org.uk/press-centre/2023/04/snaizeholme-yorkshire-dales-native-woodland-nature-boost/

[61] https://cdn.forestresearch.gov.uk/2022/02/ch1_woodland_fs2020_cgadfu3.pdf

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[63] Missing in action: natural climate solutions in England's national parks | Policy and insight (friendsoftheearth.uk)

[64] Shrubsole, Guy, The Lost Rainforests of Britain. William Collins, London. 2022.

[65] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1168372/environmental-improvement-plan-2023.pdf

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[69] JNCC Biodiversity Indicators, 2023. UKBI – B7. Surface water status | JNCC – Adviser to Government on Nature Conservation

[70] State of Our Rivers | The Rivers Trust

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[73] Office for National Statistics (2023) National Park residents England and Wales: Census 2021. Available at: National park residents, England and Wales – Office for National Statistics (ons.gov.uk)

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[78] https://www.cnp.org.uk/news/raising-the-bar

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[80] https://www.theyworkforyou.com/wrans/?id=2021-02-09.151834.h&s=

[81] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1168372/environmental-improvement-plan-2023.pdf

[82] Biodiversity deep dive: recommendations [HTML] | GOV.WALES

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[84] http://nbn.org.uk

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[90] https://www.bto.org/understanding-birds/birdfacts/hen-harrier

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[102] 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".

[103] England's was produced in 2005 and is archived here. Wales's was produced in 2007 and is available here.

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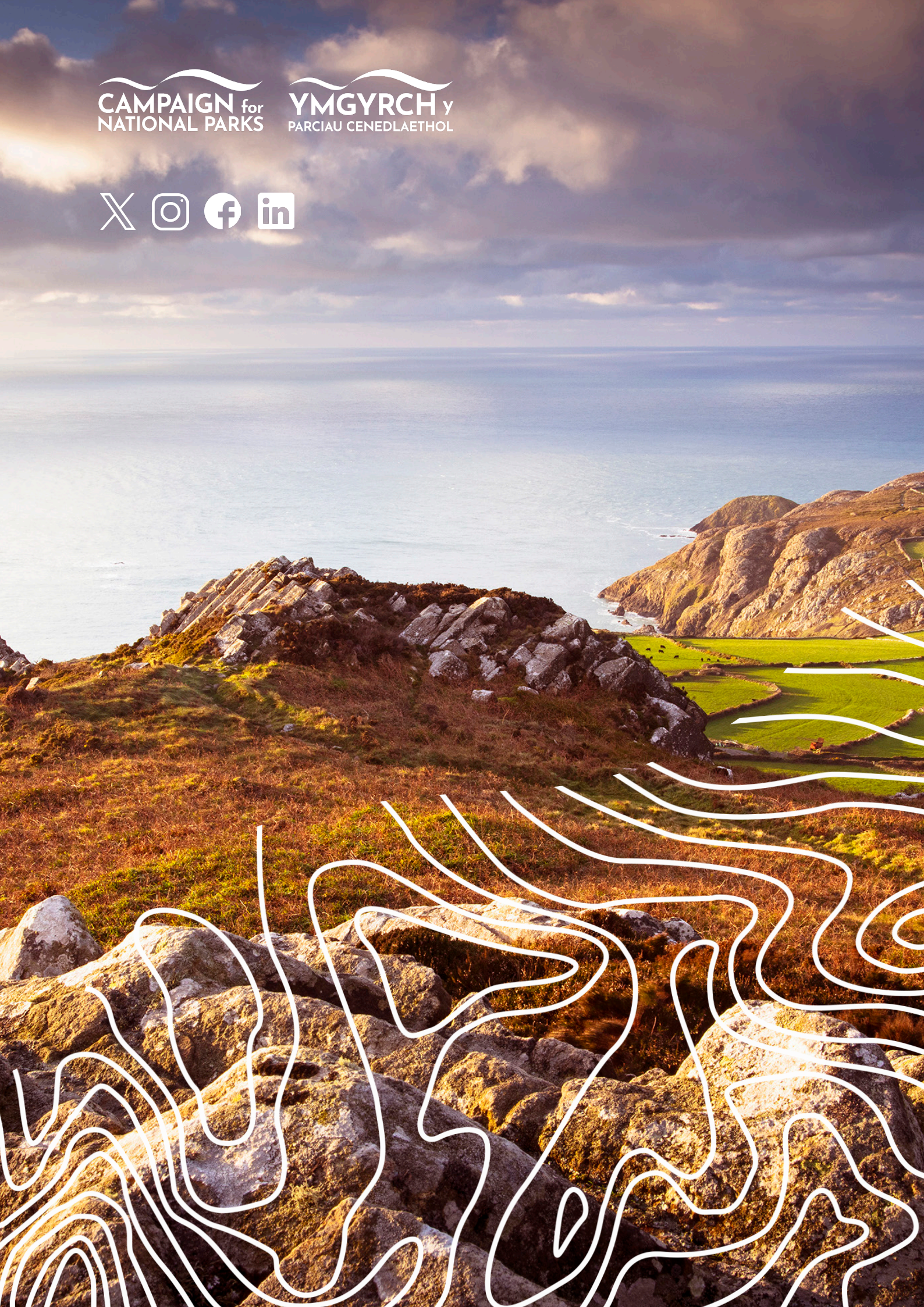
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