National Parks England Response to '25 Year Environment Plan: Measuring Progress' Consultation

January 2019

Introduction

1. National Parks England (NPE) supports the policy-making process by co-ordinating the views of the nine English National Park Authorities (NPAs) and the Broads Authority. It is governed by the Chairs of the ten authorities. Our response represents the collective view of officers who are working within the policies established by the NPAs and Broads Authority and follows internal consultation amongst officers.

2. The National Park Authorities and the Broads Authority (hereafter referred to together as NPAs) welcome the opportunity to provide input on the draft indicator framework for the 25 Year Environment Plan. We believe the indicator framework presents a real opportunity to demonstrate the contribution our National Parks make to enhancing the historic, cultural, and natural environment and the value they offer to society. We are happy to provide additional input on indicators as they are developed.

3. National Parks are recognised as landscapes with exceptional natural beauty and high environmental value, and have recognised statutory purposes to conserve and enhance natural beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of their special qualities[1]. The value of National Parks in conserving and enhancing natural beauty has also been clearly recognised in the 25 Year Environment Plan. Approximately 326,900[2] people live within England's National Parks, and many millions visit each year. As Authorities we have a significant role as place shapers, working alongside our rural communities.

Summary

4. A common theme that runs throughout these headline indicators is landscape character, and specifically the impact that these indicators will have on natural beauty and scenic value, which are central to National Park designations. However, these characteristics are not explicitly

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[1] Source: English national parks and the broads: UK government vision and circular 2010
[2] Source: ONS October 2017

recognised within the consultation paper and specific indicators to assess natural beauty and scenic value should be developed.

5. In general, we believe the framework does not adequately capture the historic and cultural environment in discussions of the natural environment. It is essential to recognise in the framework that almost all landscapes in the UK are cultural products. This recognition should underpin the framework as it is important to assess and understand the environment holistically as a complex multi-layered system that has historic, cultural, and natural environmental values.

6. We recognise that the framework in development will be used by many different groups for multiple purposes. However, many indicators could benefit from additional detail and consideration of how to measure landscape change at a broader level rather than exclusively at specific sites or for specific features. Additional work is also needed to clarify how changes in character and quality will be assessed and monitored across distinctive landscapes and heritage features.

7. Additional clarity on how the performance of underlying System Indicators will be used to inform the assessment of progress in the Headline Indicators, and what additional resources will be available for recording and monitoring, would be helpful. Further, how System Indicators that are not currently included in Headline Indicators will be used to evaluate progress on the 25 Year Environment Plan would help improve our understanding of the framework as an assessment tool.

8. Continued development of indicators could be further informed by linking to existing State of the National Parks reporting procedures or National Park Key Performance Indicators that have been adopted by National Parks.

9. We would also like to underscore that in the development and assessment of data sets, the utility, relevance, and accuracy of such data would be improved through measurement not only at the National Character Area (NCA) level but also at the district and country level. Further, we recommend the policy in the 2010 National Parks Circular[3] are adhered to; specifically, that the collection, analysis, and updating of data includes by National Park area.

Response to Specific Questions

Q1. Whether the proposed framework describes the environment in a meaningful way?

10. We have significant concerns that the indicators do not adequately consider the environment as a whole. The lack of inclusion of heritage features (currently only Sites of Special Scientific Interest (SSSI) geological sites and Scheduled Monuments (SM) are proposed to be included) is inadequate as this omits 80-90% of the historic environment. Essentially, all landscapes in the UK are culturally produced and this recognition should underpin the framework as it is important in viewing the environment as a complex multi-layered system that has historic, cultural, and natural

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[3] Source: English national parks and the broads: UK government vision and circular 2010, paragraph 118

environment values. Additionally, we believe this framework currently does not adequately capture human impacts on the night time environment, specifically with respect to light pollution.

11. Natural beauty and scenic value, which are central to National Park designations, should be more explicitly recognised within the proposed indicator framework. The measuring of landscape features as a part of the monitoring of landscape character (H11, S25) partially addresses the contribution these features make but does not fully acknowledge the importance of these values.

12. We are pleased that heritage indicators are included in the framework, both utilising existing metrics and those which require further development. We strongly maintain, however, that the environment implicitly includes the historic environment, and the role of the historic environment as part of ecosystems which provide multiple benefits should be clearly articulated. Recent developments into the language of 'cultural capital' within the concept of ecosystem services should be acknowledged and given space within this framework.

Q2. Potential gaps in the headline indicators and/or system indicators and how to fill those gaps?

13. As above, there is a major gap in the representation of the historic environment, heritage features, and cultural landscapes. This misses out a key value of the landscape and environment, which is recognised in the 25 Year Environment Plan[4] as promoting landscape quality and natural beauty, and is a major reason why many people visit places. In addition, National Park landscapes are valued for many other 'special qualities', including important benefits such as dark skies and tranquillity, and methods already exist to measure these qualities which could be included.

14. We welcome the opportunity this framework provides for including and developing monitoring indicators that provide data on the state of the historic environment. However, there should be consideration of developing a metric for the non-designated historic environment, which accounts for 90% of recorded heritage assets. Non-designated assets can be those that provide the most obvious contributions to our landscape. Further, 'invisible' heritage assets are equally important, and should be recognised.

Q3. Whether the overall number of headline and system indicators is appropriate. Are there too many, too few?

15. It does not feel that there are too many indicators given the significance of the subject concerned and data available to monitor the environment. Remote sensing could have a greater role to play going forward but time needed and frequency of surveying should be given due consideration.

16. Again, additional indicators could be required to accurately take into account the historic environment.

Q4. The approach to bundling information in the indicators. Is it better to combine multiple data sources within summary indices or to be more selective about which data to present and assess?

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[4] Source: 25 Year Environment Plan, pg. 67

17. Bundling seems appropriate so long as one indicator does not skew the relevance of implications of another. It needs to be clear, for reasons of transparency and accountability, what is contributing to the Headline Indicator if information is to be bundled together.

18. Further clarity would be helpful on how the performance of underlying indicators would be reflected in the assessment of Headline Indicators, and how System Indicators will be used in this framework to assess the progress of the 25 Year Environment Plan.

Q5. Data that you possess which is relevant to the framework and could be shared to update any of the proposed indicators?

19. National Park Authorities do hold meaningful data sets that could help inform this process. For example, our State of the Park Reports, visitor survey data, and ongoing landscape monitoring programmes that are being trialled in various National Parks can help inform various indicators. On this point, additional clarity as to what specific datasets are being used and proper guidance regarding how to feed into those datasets would be very helpful to ensure we make the most of our time and resources.

20. We recommend that the data and metrics in our State of the Park reports in particular be further integrated with 25 Year Environment Plan Indicators. NPE and individual National Park Authorities would welcome further engagement with Defra to see what could be usefully contributed.

Q6. How you might use the framework and which aspects of it you see as being particularly important?

21. If the baseline data is sufficiently detailed and up to date, there are various aspects where the information produced can positively contribute to future planning and funding initiatives. Using previously developed systems for this would be beneficial (Countryside Quality Counts and Character and Quality of England's Landscapes, for example) particularly in terms of landscape measures.

22. Again, linking to the State of the Park Report would be a key application for the framework. This would enable monitoring progress alongside the National Park Management Plans and could help identify local priorities.

Q7. The balance and scalability between local and national levels?

23. More could be done to improve the applicability and relatability of the framework at the local level.

24. The use of any remote sensing information needs to be accurate and substantiated by ground truthing survey work. The proposed use of NCAs will give a broad overview of the landscape but needs to be in conjunction with more locally based information if the richness and diversity of our environment is not only to be maintained but enhanced. NPAs as well as some Local Authorities already offer the more locally derived and detailed Landscape Character Assessment reports to

help inform and guide future development and land management changes within their boundaries. This could provide a model to be adopted more widely elsewhere.

25. Scalability applicability of the framework could also be enhanced by adhering to the guidance in the 2010 National Parks Circular that relevant authorities should collect, analyse and update date by National Park area too.

Detailed Comments – Headline Indicators

26. **Headline Indicator 2: Changes in quality and quantity of water and the water environment that affect our lives and livelihoods**

    a. H3 – NPE welcomes the inclusion of the Water Framework Directive in this indicator.

27. **Headline Indicator 3: Changes in wildlife and wild places we cherish**

    a. H6 – Wildlife and wild places are an important element of natural beauty and the landscape character of an area and diverse habitats play an important visual role in creating the landscapes we love. Visual benefits should be recognised as important in addition to biodiversity. NPE welcomes the inclusion of International Union for Conservation of Nature (IUCN) species status, however it may be worth including a national indicator of vulnerability, or a method of nationally weighting the species status indicator. For example, certain species such as Red Squirrel (Sciurus vulgaris) might fair differently if IUCN status alone was used to inform funding decisions.

    b. H7 – We welcome the use of existing protected sites but would recommend additional clarity on what sites are included in the indicator and how condition will be monitored. This indicator should also address designated sites as a whole, rather than just those of biodiversity interest. Failing to include locally important sites in condition monitoring could be a potential loophole. We would also wish to see the monitoring of UK Biodiversity Action Plan (BAP) Priority Habitats included in this indicator or incorporated into System Indicator S23.

28. **Headline Indicator 4: Changes in nature on land and water that affect our lives and livelihoods**

    a. H7, H8 – Water should be included as an asset grouping for both indicators.

    b. H8 – We welcome the proposals for this indicator and recommend the inclusion of wax cap fungi and fresh water pearl mussel in this indicator. Wetlands could also be included as an asset grouping for this indicator.

    c. H9 – We welcome the inclusion of this indicator but recommend additional clarity with regards to where habitats fall and a more holistic approach to habitat connectivity.

Improving habitats, increasing their size and linking them together at a landscape scale has a positive benefit for individual species, enhances the landscape character of an area, and builds resilience to climate change and the impact of pests and diseases. In particular, Landscape Character Assessments conducted at a District/County scale will have a greater local benefit than the NCA's alone.

d. H10 – We are pleased with the inclusion of this indicator. For fauna, it would be helpful to specify what grid scale data will be mapped to. Presence at a specific location might be less indicative of local habitat condition if a species relies on extensive habitat around that location for its food. Including specific considerations of species abundance and productivity could also improve this indicator. Here again, specifying wetlands in the asset list could improve this indicator.

29. **Headline Indicator 5: Changes in the quality of our landscapes and waterscapes**

a. H11 – This indicator appears to be assessing landscape character primarily, which is different from landscape change. Existing Entry Level and Higher Level Stewardship schemes may not capture landscape change successfully as they only cover part of the countryside of England, and schemes in agricultural intensive areas do not cover the indicators outlined here. Further, what is considered to be a distinctive landscape characteristic may vary across landscapes and designated sites and this needs clarification. For example, in the Broads National Park many typical landscape features, such as walls and hedgerows, are not present and could in fact be considered detrimental to traditional landscape quality. Similarly, monitoring landscape beauty is highly subjective and this requires additional clarification. Capital assets, for example, are not the same as natural beauty. The framework also lacks any measure of recording changes in light pollution, which has been shown to impact the welfare of wildlife and humans[5] and is cited as a specific form of pollution in the 25 Year Environment Plan. Again, referring to our response to Question 1, to more completely capture the environment in this indicator we would suggest revising it to include nightscapes alongside landscapes and waterscapes. Specifically, including the following question "Can people access high quality dark sky areas and light pollution be managed to minimise its impact upon the environment and reduce carbon emissions" and the indicator "changes in night time light pollution and the impact that this has for astronomy, astrotourism, and the welfare of humans and wildlife" would significantly strengthen this Headline Indicator.

b. H12 – We welcome the inclusion of this indicator, however, the percentage of known historical features that are scheduled is relatively small so we would suggest developing this indicator beyond the SSSI and SM condition evaluation. Designated sites are only part of the heritage features which are integral to the quality of our landscapes. The indicator needs to include the wider historic environment of places and features which include fieldscapes, field boundaries, buildings, settlements which all have strong cultural

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[5] Source: International Dark Sky Association

associations as part of a diverse heritage. It should also consider some of the less 'visible' features (e.g. palaeosoils) which are vital repositories of information, although they have a lower visual impact in the landscape. There are currently very few indicators which measure and report on the condition of the historic environment as part of rich and diverse ecosystem services. Currently we only have data for SM condition, but this is variable across England and accounts for some 10% of the whole historic environment. The developing metric should include condition assessment of heritage features at a broader landscape scale which form part of the fabric of the environment. Metrics should consider a baseline prior to the input of current and preceding agri-environment schemes, agricultural records and information contained within Historic Environment Records to measure both the improvement of heritage features and the loss/rate of loss of such features over time. This indicator could also better incorporate cultural heritage, which at present seems not to be accounted for beyond the "no detriment" principle.

c. H13 – This indicator requires additional specification as to what determines 'enhancement' of blue/green infrastructure and would benefit from further planning for the long-term management of infrastructure rather than just expansion.

30. **Headline Indicator 6: Changes in people enjoying and caring about the natural environment**

a. H14 – We welcome the use of this indicator. We would like to see this indicator also cover an understanding of how the English population engages with the highest quality landscapes across the country. It should also be expanded to engagement with the environment, not just the natural environment. Again, the 25 Year Environment Plan recognises historical and cultural values as a driver of stewardship and engagement[6]. A broader indicator which includes how people engage with both historic and natural environment would be logical as people often do not distinguish between the two. When people spend time visiting a historic place they often also engage with nature. Environmental volunteering includes caring for our historic places with positive impacts on health and wellbeing and in attitudes and behaviours towards the whole environment. This indicator is closely linked to Headline Indicator 5. If we have attractive places then people are more inclined to visit them and engage with the natural and historic environment both in time and resources.

b. H15 – We welcome inclusion of this indicator and collect existing volunteering data that could contribute to the monitoring methodology. Developing metrics should take account of broader datasets such as the Department for Digital, Culture, Media and Sport (DCMS) Taking Part Survey[7] and data from National Parks on volunteering across natural and historic environment.

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[6] Source: 25 Year Environment Plan, pg. 106
[7] Link: https://www.gov.uk/guidance/taking-part-survey

c. H16 – We welcome the inclusion of this indicator. The landscape and natural and cultural heritage of National Parks coupled with the extensive experience of the organisations, businesses and communities within them provide a huge opportunity to realise health and wellbeing benefits. National Park Authorities and their partners are delivering and developing projects where an increase in peoples' health and wellbeing is a main objective; an increase in health and wellbeing is part of why National Parks were created 70 years ago. With regards to the metric, we recommend speaking to academic institutions such as the University of Exeter and University of Derby who have specialist research groups in this area. We are happy to provide contacts if required.

31. **Headline Indicator 8: Changes in resilience to natural hazards**

    a. H20 – We welcome inclusion of this indicator and would expect that the importance of rural homes, businesses, infrastructure and impact on the visitor economy are given due consideration. There is also a need for rural areas to recognise that some natural landscapes will be always prone to flooding. There may be new areas of landscape needed to prevent flooding of urban areas and infrastructure due to climate change, but these are an opportunity to improve landscape natural beauty and habitats.

    b. H21 – We welcome inclusion of this indicator and would request that it also cover the risk and implications of wildfires. As we saw in the summer of 2018, wildfires can have a long-term and short-term impact upon habitats, wildlife, human welfare and carbon dioxide emissions into the atmosphere. We believe that a matrix indicator needs to be identified to monitor this. For example, area of moorland/forest inadvertently burnt on an annual basis. It is also important to distinguish between burning as a land management tool and largescale wildfires. There is also opportunity for synergy with indicator H22. For example, rewetting of moors by gully blocking and seeding had a significant beneficial impact in helping to curb the spread of Moorland fires in the Peak District.

    c. H22 – We welcome inclusion of this indicator and feel that National Parks could help inform the development of this indicator on the back of the natural flood management work that is already being undertaken through projects like Moors for the Future and the North Lees and South West peak projects. Reducing flooding using natural methods has visual and biodiversity benefits but requires the support of landowners.

32. **Headline Indicator 9: Changes in the impact of exotic pests, diseases, and invasive non-native species**

    a. H23 – We welcome inclusion of this indicator to combat the threat posed to the special qualities of the National Park by non-native species. However, this indicator could benefit by incorporating the significant impact of invasive species on landscape character and natural beauty. Ash die back will have a substantial visual and character impact in the White Peak for example. This also points to the need to diversify woods and planting to reduce the risk of losing all trees in a landscape.

b. H24 – Impact of the visual and character change on the wider environment should be addressed in the analysis of this indicator, for example with regards to tree disease.

33. **Headline Indicator 11: Changes in production and harvesting of natural resources**

a. H28 - We welcome inclusion of this indicator. However, we would wish to see clarification made between the terms 'farming' and 'agriculture' here. If H28 were identified as 'Agricultural Productivity' then we would suggest that this should also include woodland productivity as in the forestry industry trees are grown as a productive crop. In terms of enhancing the environment, productivity does not need to be the only metric considered, as the viability of farms and their ability to improve the environment can be aided through payments for conservation. Agriculture can also have significant impacts on landscape and Natural Beauty, affecting habitats, cultural heritage features, landscape character and condition.

b. H29 – This indicator is vital, and we welcome its inclusion and development. The 25 Year Plan identifies the importance of 'restoring our vulnerable peatlands' and we would wish to see a specific peatland quality indicator developed here based on rewetting and appropriate vegetative cover. National Park Authorities have a wealth of experience that could be tapped into here Such as the 'Moors for the Future' Project and engagement in the current Defra Peatland Restoration Project. Soil loss and depletion continues to be an issue causing diffuse pollution in sensitive water courses. We would also wish to see this indicator establish a means to monitor and address this ongoing issue.

c. H30 – We have reservations with this indicator with respect to the emphasis on productivity. Woods and forests have many different purposes and natural capital benefits including landscape enhancement, wildlife conservation, public recreation, and this should be recognised in this indicator beyond just timber production. Every wood should have a woodland management plan and if the prime objective for the wood is timber production then productivity should be covered under indicator H28. However, if the management plan indicates that landscape enhancement, public recreation, wildlife conservation are the key objectives for the woodland's existence then the area of these woods should be excluded from this indicator. As it currently stands this indicator is likely to result in conflicts and could lead to unintended environmental harm.

34. **Headline Indicator 13: Changes in greenhouse gas emissions from natural resources**

a. H36 – We welcome inclusion of this indicator, however, it is not clear whether the emissions derived from moorland wildfires are included in the data for this. The damage these fires have on deep peat stores can be devastating and research has indicated that 96 tons of carbon can be released per hectare of deep peat burnt.

Detailed Comments – System Indicators

35. S5 – We welcome inclusion and development of this indicator. It should also look to address suspended solids/diffuse pollution incidents.

36. S15 – We welcome the inclusion and development of this indicator. With many of England's most significant rivers having their watersheds lying in the uplands of the English National Parks this indicator will be significant to the appearance of the National Park Landscapes. The expertise of National Park staff could be helpful in developing the assessment methodology associated with this indicator.

37. S16 – We welcome inclusion of this indicator. It could be sub-divided into 'areas of managed and non-managed woodland' thus better linking to Defra's 2013 Government Forestry & Woodlands Policy Statement. There is also a lack of recognition for single veteran trees/mature hedgerows/ hedgerow trees/hedges/trees outside of woodlands that within the wider environment play a significant and important role, adding to the character, visual amenity and habitat potential of an area.

38. S21 – We have concerns with the inclusion of this indicator as a monitoring means for the 25 Year Environment Plan and unless significant changes are made to this indicator we would suggest removal. There are significant differences, with respect to woodland management, between the private sector and the Public Forest Estate. Notably there are substantial additional social and environmental benefits that are derived from the Public Forest Estate that are not adequately measured by an indicator that looks solely at volume of timber brought to market.

39. S23 – This indicator could be broadened to cover 'abundance and distribution of priority habitats and species' thereby encompassing all UK BAP priorities and Section 41 Natural Environment and Rural Communities Act requirements.

40. S25 – This indicator could be improved. Not all landscapes will be subject to agri-environment schemes, so it does not give a comprehensive picture. The current agri-environment schemes address some features of landscape character but do not address landscape quality or condition in a wider sense. Natural beauty and scenic quality will not be addressed by these metrics, nor will special qualities such as dark skies, local distinctiveness and tranquillity. National Character Areas are also large-scale and it is easy to miss out small details that make landscapes unique. The original Dark Peak NCA was, for example, described as wild and unsettled, yet included Derwent Valley with a large number of villages and a sizeable percentage of the Peak District population. This metric would be more useful if done at a county or district scale, as well as the NCA scale.