



Local Nature Recovery Strategy Consultation

Response by National Parks England

November 2021

Summary

1. National Parks England (NPE) exists to provide a collective voice for the nine English National Park Authorities and the Broads Authority – all of whom are Local Planning Authorities. NPE is governed by the Chairs of the ten Authorities. Our response to the [Local Nature Recovery Strategy Consultation](#) represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs) and the Broads Authority and follows internal consultation with all ten English National Parks represented on the Conservation Directors and Agriculture and Rural Development Working Groups.
2. The National Parks and Broads Authorities cover 9.7 % of the area of the country and all have a great deal of experience in environmental land management. All authorities are actively involved in Nature Recovery projects, working in partnership to deliver landscape scale outcomes for nature.
3. Appendix 1 sets out our narrative response to issues related to the development of Local Nature Recovery Strategies that the format of the consultation did not allow. Whilst some National Park Authorities have responded individually and specifically in relation to their local circumstances, this response brings a consolidated response from a number of the English National Parks and deals with some fundamental principles that require further consideration. In summary, we recognise the value of LNRS as a mechanism to deliver nature recovery networks in England and wish to emphasise the following key points:
 - a. National Parks and other Designated Landscapes have a key role to play in the development and delivery of LNRS.
 - b. For some Designated Landscapes, it is entirely appropriate that they function as the Responsible Authorities in the delivery of LNRS.
 - c. The role of National Park Authorities as Local Planning Authorities can use mechanisms such as Biodiversity Net Gain to translate our statutory purposes into planning decisions for nature recovery.
 - d. Designated Landscapes already have in place, excellent mechanisms to deliver advice and support to farmers and land managers
 - e. Designated Landscapes can play a critical role in identifying locations and prioritising actions that deliver Local Nature Recovery and Landscape Recovery through ELM.
 - f. Where Designated Landscapes are the Responsible Authority, these must tie in to the constituent and adjoining Local Authority plans to create seamless and coherent landscape scale strategies.

- g. A standard approach to developing frameworks for easy collation, comparison and scaling is essential whilst accounting for local distinctiveness
 - h. Appropriate resources need to be available to ensure that LNRS can be successful.
 - i. Natural England's Nature Recovery Network Delivery Partnership is key to achieving a cohesive vision linking all of the LNRS's together.
 - j. Local Nature Recovery Strategies should be based on and include all sources of available data, particularly locally held knowledge, data and evidence. More work is needed to understand the constraints of data ownership and how best to enable straightforward data sharing to take place.
 - k. Whilst the targeting of limited resources is understood, there is a need to consider all opportunities for nature recovery as lower priority outcomes may be more easily funded but still add significant value to the network when aggregated.
 - l. What opportunity does LNRS offer to review European Designated sites and the associated management prescriptions and challenge whether focus on single species is consistent with the transformational change that is required in land management to achieve these aspirations.
 - m. It is unclear how LNRS will sit alongside other policies and strategies such as ELM, BNG, Local Plans, Planning White Paper, in the work of LNP's, in generating private investment into Nature Recovery and the relative weight it carries in relation to other agendas (for example Public Health and Energy policies). It would be helpful if the relative priority of LNRS was discussed as and agreed as part of this consultation process.
4. If you require any more information, further practical examples or have any questions regarding this response please contact us.

Appendix 1 - Consultation question responses for the English National Park Authorities & National Parks England.

1: Introduction

1.1 Whilst we appreciate that the consultation is focused on the process of the delivery of LNRS, there are limitations in the consultation mechanism and this inherently restricts the level of response that can be offered through this format. Whilst some National Park Authorities have responded individually and specifically in relation to their local circumstances, this response brings a consolidated response from a number of the English National Parks and deals with some fundamental principles that require further consideration.

2: Administration – the case for Designated Landscapes as Responsible Authorities

2.1 The English Designated Landscapes (44 National Parks and Areas of Outstanding Natural Beauty (AONB) cover 24% of the UK and present a significant and unique opportunity to address nature recovery at scale. The Designated Landscapes have a specific statutory purpose which makes nature recovery central to our work and the duty to regard this purpose should afford a greater emphasis on them as the backbone of the nature recovery network and as a spatial unit for LNRS.

2.2 Whilst working through existing partnerships and mechanisms will be entirely appropriate for some Designated Landscapes, for others it is important there is the option available for a protected landscape to lead on delivery of a LNRS.

2.3 National Park Authorities and AONB's have the knowledge, skills and expertise to drive LNRS in and around our landscapes and protected landscapes present the optimum opportunity to meet this Government's 30x30 commitment at scale and in a way that connects between us. Consequently, we wish to see National Parks and AONBs at the centre of the new system of spatial strategies for nature that the LNRS will provide. This could be achieved by:

- i) The National Park Authority being the Responsible Authority for the LNRS where appropriate;
- ii) Requiring the LNRS to fully reflect the nature recovery ambitions of the National Park Management Plans (NPMP) and for public bodies to support their implementation
- iii) Where the Responsible Authorities are Local Authorities, the NMNPs (as effectively the National Parks manifestation of LNRS) should carry more weight with partners and the section 62 duty (Environment Act, 1995) should be strengthened to make the NPMP a statutory requirement for public bodies to support. There should also be set up, a duty to cooperate for Local Authorities who are responsible for LNRS to co-operate with National Park Authorities and vice versa. This will ensure the LNRS's in and between Designated Landscapes build on the ambitions in NMNPs and connect geographies to form the network at scale; the Management Plans should set the direction for the LNRS in National Parks and not be subservient to them.

2.4 The case for taking this approach above is as follows:

- i) National Parks are special purpose Local Authorities with a clear purpose to conserve and enhance natural beauty, wildlife and cultural heritage and are set up by national Government to do this. Each of these areas is covered by a management plan; a collaboratively developed and endorsed partnership approach to delivering National Park and AONB Purposes and logically would provide the basis of Local Nature Recovery Strategies in their areas. The bodies leading them have a long history of working closely with landowners and stakeholders in the private, public and third sector to set and deliver ambitious targets through Wildlife Delivery Plans.

- ii) National Park Authorities are also Local Planning Authorities and will therefore be able to use mechanisms such as Biodiversity Net Gain to translate our purpose into planning decisions for nature recovery. Local Authorities are well versed in working with us as the lead planning authority for our areas, and this approach leaves no gap in the coverage of planning policy and development management across England.
- iii) Administrative boundaries do not reflect landscape character or characteristics and so relying on these to develop nature recovery at a landscape scale misses an opportunity to work with natural systems and processes to achieve successful nature recovery programmes.
- iv) Designated Landscapes can play a critical role in identifying locations and prioritising actions that deliver Local Nature Recovery and Landscape Recovery through ELM. National Park and AONB Management Plans cover the full array of public benefits and would be an entirely appropriate mechanism for prioritising actions especially as through the spatial focus for these Plans.
- v) Of course, where Designated Landscapes are the Responsible Authority, these must tie into the constituent and adjoining Local Authority plans to create seamless and coherent landscape scale strategies but as National Parks and AONB's are already connected in to Local Authorities through their governance, and through mechanisms such as Local Nature Partnerships, this should not be a barrier.

3: Process and Resources

3.1 There is a requirement for a standard approach to developing frameworks with templates to assist standardisation for easy collation, comparison, and scaling. However, it is also essential that local distinctiveness is accounted for and is able to be represented within the process.

3.2 The process should be democratic and inclusive as nature is critical to and underpins our wellbeing.

3.3 The strategies should utilise and integrate NPMP's, landscape character assessments, National Park Authority Local Plans, climate change adaptation reports and State of the Park Reports where these support the describing of the local habitat map as well as developing the priorities and measures needed to implement the strategy.

3.4 It would be helpful to understand how it is expected that the preparation of LNRS's will be resourced within Designated Landscapes to make a meaningful contribution. Our colleagues in the Lake District shared this learning from the Cumbria pilot:

‘to make a meaningful and influential contribution would take at the **very minimum** (emphasis added) one day a week for one person during the LNRS development period (plus other contributions from the GIS team)’

3.5 LNRS presents an opportunity to be more ambitious and transformational but will require significant additional resource to be able to deliver this aspiration.

3.6 We need clarification on how the individual LNRS' will be 'knitted' together so that there is a genuine network rather than a collection of individual strategies. There needs to be a more cohesive vision linking them together rather than a process of neighbours talking to neighbours to achieve the desired outcome. Natural England's Nature Recovery Network Delivery Partnership is key to achieving this.

4: Data

4.1 Local Nature Recovery Strategies should be based on and include all sources of available data, particularly locally held knowledge, data and evidence. Data that is relevant and essential to the development and delivery of LNRS is held by a wide range of bodies, organisations and agencies. Whilst most will be willing to share the data they have, some hold data which has a commercial value, some hold sensitive species data, and some have data under licence which they are prohibited from

sharing. More work is needed to understand the constraints of data ownership and how best to enable straightforward data sharing to take place.

4.2 The other issue around data is resourcing, data is held in different formats and for some organisations, the time required to provide this information may be prohibitively onerous. It may be necessary to provide resources to assist with this aspect.

5: Land Manager Support

5.1 To achieve landscape scale change, the LNRS panel will need to consider nature recovery at a strategic level. Whilst the delivery of Local Nature Recovery Strategies will rely heavily on collaboration with and the cooperation of local landowners, all land identified as providing a nature recovery opportunity should be considered and landowners engaged to support delivery.

5.2 The importance of developing consensus cannot be underestimated, and action should be stakeholder led. Designated Landscapes already have in place excellent mechanisms to deliver advice and support to farmers and land managers (e.g. through FIPL and Farm Cluster groups) and these should be utilised and strengthened to encourage and facilitate their involvement with the preparation of Local Nature Recovery Strategies.

6: Prioritisation

6.1 Whilst the targeting of limited resources is understood, there is a need to consider all opportunities for nature recovery – not just those deemed ‘priority’ to provide as much opportunity as possible for nature recovery – particularly as lower priority outcomes may be more easily funded (i.e. less expensive) but still add significant value to the network when aggregated.

6.2 There is also a compelling argument that LNRS is integrally linked to landscape which in turn is influenced by the historic environment and the importance of this link cannot be underestimated, both in terms of being a potential constraint but also in being a coherent element of the landscape in which nature recovery takes place.

7: Relationship with other Government programmes and priorities

7.1 One of the limiting factors in delivering holistic improvement in nature and biodiversity, as well as the challenging requirements of climate change mitigation and adaptation is the somewhat narrow and exclusive designation of certain European Designated sites and the management prescriptions that go with them. We want to know what opportunity LNRS could offer to review these. Also, could LNRS challenge whether focus on a single species is consistent with the transformational change that is required in land management to achieve these aspirations?

7.2 It is unclear how LNRS will sit alongside other policies and strategies such as ELM, BNG, Local Plans, Planning White Paper, in the work of LNP’s, in generating private investment into Nature Recovery and the relative weight it carries in relation to other agendas (for example Public Health and Energy policies). It would be helpful if the relative priority of LNRS was discussed as and agreed as part of this consultation process.

For Further Information:

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