



Nature Recovery Green Paper

Response by National Parks England

Summary

England's National Parks should be places where nature thrives. As the Government's Landscapes Review (2019) highlighted they, along with Areas of Outstanding Natural Beauty, should form the backbone of the new national Nature Recovery Network. We welcome and enthusiastically support the case being made for strong nature recovery within our protected landscapes and beyond. These beautiful places —designated because they form large contiguous areas for natural beauty¹ — have been ecologically functioning landscapes, in places for millennia. They have been recognised for their natural beauty but 30% of the land within National Parks has also already been recognised as being of national or international importance for wildlife. Many other areas are not designated for biodiversity yet are important havens for nature. For example, 2021 figures from Natural England show that there are over 190,000 ha of priority habitats in NPs that are not designated as SSSI/SAC/SPA etc. And beyond these spaces for nature there are exciting opportunities to create new wildlife habitat. They also have potential for habitat restoration with remnant and source populations.

The Nature Recovery Green Paper provides a welcome opportunity to take stock of what has happened to nature in this country, and our response as a society. The decline in wildlife has been well documented. We recognise that business as usual is insufficient to the threats now posed. We need to improve existing protected areas by better managing the direct and indirect influences affecting them. We need to make space for nature in new areas; and establish wildlife corridors to establish the new nature recovery network with protected landscapes at its heart.

We are already rising to the challenge and have agreed as a family of National Parks a *Wildlife in England's National Parks Delivery Plan*. This builds on the innovative work undertaken within National Parks, by NPAs themselves and our partners, and sets out how we hope to restore and manage 145,000 ha of additional habitat. National Parks already have large areas that may be outside of designated sites but which contribute towards the Government's 30 by 30 target. Examples include Local Wildlife Sites, other public land, or private estates. We estimate that 44% of the land within England's National Parks is under positive management for nature². With financial support, leadership, and partnership with many organisations involving the public, private and third sectors, we aim to increase this to 56% by 2030. This can make an important contribution towards the Government's nature recovery and wider 25 Year Environment Plan targets. To achieve this scale of nature recovery will require significant investment (we estimate in the region of £800m) from a range of public, private and third sector sources between now and 2030.

¹ The *National Parks and Access to the Countryside Act 1949* Part II, Section 5 says National Parks are "extensive tracts of country in England" by reason of their natural beauty, opportunities for open-air recreation having regard to their character and to their position in relation to centres of population.

² In HLS and Countryside Stewardship June 2021

It is important that Government, public, private and third sectors collective work on habitats and species is looked at through a climate as well as a nature lens. We need to be making decisions at a landscape scale and make use of the latest evidence and science to make the right choices from a climate as well as a nature perspective. For the national parks this drives our net zero with nature programmes. There is also a need to better integrate nature recovery into place – NPAs can help with this.

National Parks England would like to see:

- Defra articulate far more clearly what role they see for protected landscapes (both the places and the Authorities) in nature recovery given their potential, importance, and profile. This is currently weak within the Green Paper.
- Providing a stronger role for protected landscapes (both the places and the Authorities) as the backbone of the Nature Recovery Network with a clear role for their Management Plans in the forthcoming guidance on Local Nature Recovery Strategies so as to maximise synergy and avoid duplication or overlap.
- Protected landscapes being made a genuine priority for ELM and NPAs being given a direct role in facilitating ELMs – a key mechanism to deliver nature recovery, building on the success of the *Farming in Protected Landscape* (FiPL) pilots that enable ELMs to deliver in our distinctive and varied landscapes.
- Public bodies aligning around the geography of place (see Levelling Up White Paper) with Defra encouraging its ALBs and other Government departments and bodies to prioritise and invest in nature recovery in protected landscapes.

Nature Recovery Green Paper proposals

Turning specifically to the measures in the Nature Recovery Green Paper, NPE believes that many of the changes, if done well, led by science and evidence and properly resourced could be positive.

Protected Sites

- The current system (site/species designations) is not enough to maintain the quality of these sites or to drive nature's recovery. NPE is concerned, however, to ensure that reforms to protected sites lead to making space for nature and good communication, not additional confusion, and lots of administration on re-notification.
- Damage to vitally important sites should not occur in a drive for simplicity that glosses over what can be unavoidably complex scientific judgements. Instead, there is a communications challenge to clearly articulate the value of these protected sites.
- Consideration of widening or amalgamating the various nature designations is less important than retaining and strengthening their protections and ensuring that the requirement (and objective) for each designation will incorporate an *improvement* (i.e. recovery) in their habitats and species.
- Sufficient resources are needed whatever the nature conservation series looks like. These resources for Natural England, NPAs and others are necessary to support advice to land managers on how to ensure the protected sites can achieve their stated purposes. Without such resources the system of protected sites, however they are organised or named, risks failure.

- There does need to be flexibility to take account of changes brought about by climate change. We agree that the designation series is inflexible in this respect. This can be achieved through the Local Nature Recovery Strategies and renotifications rather than blanket rewiring.
- There are some SSSIs, particularly within our upland National Parks where the original notifications do not account for the changes to nature and species distribution patterns brought by climate change. We would welcome working with Natural England on a prioritised number of SSSIs within National Parks to see how the notifications could be amended to better take into account the effects of climate change.
- We support the Government's intention to rely more heavily on scientific evidence-based decisions and for that reason believe Natural England should continue to be responsible for designation of protected sites.
- National Parks have considerable experience of working to promote nature recovery beyond designated sites. We would be happy to host visits and discussions between those involved in pioneering landscape scale nature recovery work and Defra officials.
- More can be achieved outside of designated sites by better integrating protected landscapes into Defra/ NE's thinking on designated sites to enable better join up; ensure synergies are maximized through joining up ELMs, Nature Recovery and Protected Landscapes programmes; and investing in additional Landscape Recovery Projects and Catchment Partnerships.
- NPE is excited by the prospect of a new designation that would provide more space for nature, though we recognise more detail is needed. NPAs are already co-ordinating 'calls for sites' to identify potential sites for nature recovery. Local wildlife sites and their protection in the planning system are also important. These are often drawn upon for Neighbourhood Plans, Village design statements (some of which are SPDs). It is vital that any additional designations (whether formal or otherwise) are properly integrated into the nature recovery network and are not isolated islands on their own.

Protected Sites Management

- The protections afforded to national and international nature conservation sites under the existing legislative frameworks play a central role in protecting significant areas of our National Parks.
- The Habitats Regulations are there to protect the jewels in the crown of our designated sites so it's right that they set a high bar. We look to Government to ensure any changes maintain the same high level of protection, including continuing relevance of EU derived case law.
- We believe closer working between Natural England and Local Planning Authorities, including NPAs, particularly in relation to issuing guidance, would be helpful and reduce the risk of developments stalling as new processes have to be established.
- We welcome the use of Site Improvement Plans (SIPs) as they move beyond simply listing damaging activities. In our experience they vary considerably. This is due to them having a low profile, poor monitoring programmes, and lack of resources to enable them to be implemented. They also frequently fail to address off-site impacts. With improvements, SIPs should play a greater role in future and need to be better integrated into other ecologically important sites to strengthen resilience. To enable flexibility and so they can change based on monitoring data, we do not support SIPs being made statutory.

- We would like to see the Habitats Regulations Assessment requirements strengthened to better take account of recovery (not just protection) objectives – building on the concept of SIPs. More could also be done by regulatory bodies to strive for greater consistency.
- EIA should continue to have the environment its primary focus, rather than be evened out to take account of socio-economic factors that are already prominent in the decision-making process.
- In our experience existing decision-making processes seem powerless to prevent the cultivation of permanent pasture and semi-natural habitats and urgently need to be strengthened.

Afforestation

- The extent to which afforestation will contribute towards nature recovery will depend upon the species chosen, the density of planting, the location, geography and ecology, and a range of other factors. Currently 71% of the public forest estate within England is productive conifer forest not broadleaved woodland. We would welcome two targets - to diversify the proportion of conifer/broadleaved woodland in the nation's forests to say 60%/40% by 2050, and to significantly increase the % of broadleaved species of the PFE.
- National Park Authorities are enthusiastic about creating new native woodland within National Parks that uphold Right Tree in the Right Place principles and collectively are committed to creating 36,000 ha of new native woodland. Afforestation must be carefully planned. We are also prioritising the management and restoration of open habitats such as heathland, peatland and wood pastures. These make huge contributions to the richness of the nation's biodiversity and many of them with National Parks are of national and international significance.
- Whilst we would support FC completing its aerial mapping programme for afforestation, it is not clear how this adds value to the sensitivity mapping which FC has already undertaken; how this work will be integrated with preparation of Local Nature Recovery Strategies, or be informed by National Character Areas?
- Aerial mapping must be ground truthed with local expertise, especially in protected landscapes. NPAs are happy to work with Forestry Commission to achieve this. More detail is needed on this exercise and until that is available, we would not support relaxing EIA requirements for forestry in nationally important, protected landscapes.
- NPE has agreed an Accord with the FC and this provides a strong partnership for working closely together moving forward. We would advocate the use of this Accord to guide new woodland planting within National Parks.
- We do not believe it is desirable to have a blanket ban on the removal of the permanency requirement for forestry. We identify in our response cases where this might be appropriate, but also cases where it would not be appropriate and might, for example, undermine planning conditions, conservation covenants, or the effective functioning of the Woodland Carbon Code.
- NPE would welcome attention being given to powers to drive the restoration of plantations on ancient woodland PAWS back to a more natural state.

30 by 30

- We support the Prime Minister's 30 by 30 commitment. We agree with the three criteria included in the Green Paper for determining eligible sites but believe a fourth should be added requiring sites to receive *adequate resources for their effective management*.
- The Green Paper says National Parks and AONBs do not currently contribute towards 30 by 30. This is overly negative and misleading given that 30% of the land in England that has been recognised as being of international importance for wildlife is found within National Parks. The narrative related to Nature Recovery should highlight that National Parks hold the best remnants of nature and source populations for nature's recovery, albeit that they require more investment and attention to be as good as they could be. The opportunities for Nature Recovery in Protected Landscapes should be invested as a priority because they are places where the biggest returns are possible and where projects can inspire nature recovery at scale.
- We are committed to working with Government and our partners to enable a larger area of our National Parks to contribute to the target. Given NPAs own less than 2% of the land in National Parks this requires major work to achieve this by Government, its Agencies, private and third sector and other partners. Without this, progress will be severely hampered.
- Enabling National Parks to be the backbone of the nature recovery network will require significant new investment in National Parks; and strengthening legislative duties on ALBs and other Government bodies to ensure they do their bit in National Parks. Natural England is currently working with NPE on a *New Outcomes Framework* to guide National Park Management Plans. In theory this would require ALBs to sit down with each NPA to work how much habitat they would pay to restore in each National Park. We need Defra to envision what ALBs 'furthering' our statutory purpose would look like in each of the National Parks and AONBs and help to facilitate that.

Species

- NPE supports species protection reform, providing undertakings are made that there will be no weakening of the protection afforded to different species compared to that currently in existence as a consequence of European legislation.
- We believe that discussion on reform of species legislation should involve close engagement with the devolved Parliaments to ensure synergy between neighbouring countries.
- Whilst we support use of all the criteria included in the Green Paper for determining the level of protection a species should receive, we believe when applying the socio-economic criteria that this should not be superior to the ecological requirement of that or competing species.
- There is a need to separate out species protection from re-introductions, Invasive non-natives, and pest control as they are all different issues.
- For tackling wildlife crime, NPE would support stronger penalties, with any harmonisation leading to stiffer penalties; and ensuring local police are well resourced and trained to be able to prioritise wildlife crime investigation.

Institutions and Finance

- There is a good case for looking at the geography of how bodies work together. This would be consistent with taking a more spatial approach as advanced in the Levelling Up White Paper.
- If protected landscapes are to be the backbone of the Nature Recovery Network – as recommended in the Government’s Landscapes Review – then it is vital that:
 - a) There is alignment between Defra ALBs when operating in and close to protected landscapes,
 - b) Investment is prioritised in these places first, to enable them to be better, bigger, and then more joined up,
 - c) Synergies are identified so that public money delivers public goods efficiently in these places, whichever institution the budget resides in, and
 - d) Collaborative working across boundaries and institutions is based around agreed priorities in the statutory management plans for these places.
- Whilst work has been underway to enable better integration in the strategic programmes between the different Defra ALBs, we not aware of this being used to determine how they can work more effectively to deliver nature recovery (or indeed other) outcomes in protected landscapes.
- The statutory National Park and AONB Management Plans already provide a key mechanism to take forward the government’s nature recovery ambitions and cover almost a quarter of the country. We would welcome Defra envisioning how things would be different if its ALBs were to ‘further’ nature recovery through these management plans.
- Currently a lack of resource or frequent staff turnover can mean that at a local level, some ALBs need to operate as a regulator first and foremost. Whilst important, if we are to achieve nature recovery we need to look beyond this to how different bodies can work in genuine partnership with proactivity beyond the statutory minimum.
- NPE has previously highlighted concerns about the lack of integration between protected landscapes and local nature recovery strategy boundaries. Protected Landscapes already have statutory management plans in place that include the conservation and enhancement of nature as a primary statutory purpose. We hope their role, as primary documents for the backbone of the Nature Recovery Network will be properly recognised in planning for the network. A failure to do so risks hampering nature recovery efforts for those protected landscapes that cover many administrative boundaries.
- A strong signal of National Parks indeed being the backbone of the Nature Recovery Network would be to enable the transfer of public land holdings (that might include National Nature Reserves or Local Wildlife Sites within National Parks) to the relevant NPA, with the associated funding and mechanisms to manage them.
- We welcome the recognition in the Green Paper of the innovative work being undertaken by the UK National Parks and Palladium through Revere which is aiming to lever in at least £200m+ of private finance into UK National Parks by 2030.
- NPE and key partners are clear that the ambition and need for nature recovery in National Parks far exceeds the public funds currently available. To unlock additional resources for nature recovery at scale in England’s National Parks, we estimate will cost in the region of £4.5m in the next three years alone. This would enable us to create a *Nature Recovery Scaling Team* in every

National Park along with a central co-ordinating team to drive progress forward. This would be a real catalyst for this work, enabling positive outcomes at scale, and build on the National Park Authorities' record as test beds for innovation.

- Our Delivery Plan sets out how we aim, working with others, to create, restore and improve the management of around 145,000 ha of habitat in England's National Parks (detailed in our response). To achieve this scale of nature recovery will require significant investment (we estimate in the region of £800m across the National Parks) from a range of public, private and third sector sources between now and 2030.

Defra Question	NPE Response
Introductory questions	
1. What is your correspondence address? Please provide an email address or telephone number unless unable to. If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.	NPE, Canopi, 7-14 Great Dover Street, London SE1 4YR Paul.hamblin@nationalparksengland.org.uk Tel: 07968 760 854
2. Would you like your response to be confidential? Please see the confidentiality and data protection section at the end of this document. <ul style="list-style-type: none"> • Yes • No • If ticked 'Yes', please state why 	No
3. Please tell us in what capacity you are responding to the consultation by selecting from the following: <ul style="list-style-type: none"> • Individual • Research organisation • Sector trade body or membership organisation • Ecologist • Academic • Planning consultant • Developer or builder • Local Authority • Public body • Non-governmental organisation • Farmer • Landowner • Other (please state) 	Membership organisation
4. If responding on behalf of an organisation, please provide the name of the organisation you are responding for.	National Parks England
5. Please indicate your specific areas of interest in responding to this consultation: <ul style="list-style-type: none"> • 30 by 30 • Protected sites • Habitats Regulations assessment • Trees and forests • Species • Green finance 	We are interested in all aspects relating to the terrestrial environment. National Park Authorities are the sole statutory planning authorities for their respective areas and so are well versed in the application of the Habitats Regulations and the requirement for Environmental Impact Assessments for more significant development proposals. In our

<ul style="list-style-type: none"> • Marine: protected sites • Marine: 30 by 30 • Arm's length bodies • Cost recovery • Environmental impact assessment • Other (please specify) 	<p>capacity as planning authorities, we are also 'competent authorities' under the provisions of the Habitats Regulations.</p>
<p>6. Please indicate which location your response relates to, selecting from the following:</p> <ul style="list-style-type: none"> • United Kingdom • England • Northern Ireland • Scotland • Wales • Other (please state, where) 	<p>England</p>
<p>Consultation questions</p>	
<p><i>Protected sites: a new consolidated approach (page 8)</i></p>	
<p>7. What degree of reform do we need to ensure a simpler and more ecologically coherent network of terrestrial protected sites?</p> <p>We would be particularly interested in your views of how we can have a coherent, effective and well-understood system of protections, as well as supporting the delivery of our legal binding species abundance target and other potential long-term targets.</p> <p>Please tick the option you prefer and explain your answer in the free text box.</p> <ul style="list-style-type: none"> • Option 1: Reform including a tiered approach emulating the approach taken in the marine area for HPMAs and MPAs, consolidating existing protected site designations and the creation of highly protected sites • Option 2: Lighter touch reform including streamlining existing site designations (SACs, SPAs, and SSSIs) • Option 3: Amalgamation into a single type of designation with a scale of protections • Other • No reform • Do not know 	<p>Other</p> <p>In our view consideration of widening or amalgamating the various nature designations (SAC, SPA, Ramsar, SSSI etc) is less important than retaining and strengthening their protections and ensuring that the requirement (and objective) for each designation will incorporate an <i>improvement</i> (ie recovery) in their habitats and species.</p> <p>We recognise that the network of terrestrial protected sites is generally poorly understood. The basis for designation, developed over many years does provide for a coherent network ecologically – albeit that some change is needed to address the impacts of the climate emergency.</p> <p>We would welcome attention being given by communications experts on how the system of terrestrial protected sites can be better explained to the public, landowners and policy makers. This needs to inform and to inspire.</p> <p>NPE would stress that sufficient resources are needed whatever the nature conservation series looks like. These resources for Natural England,</p>

	<p>NPAs and others are necessary to support advice to land managers on how to ensure the protected sites can achieve their stated purposes. Without such resources the system of protected sites, however they are organised or named, risks failure.</p> <p>We do not support changing the system of protected sites. Reasons are:</p> <ul style="list-style-type: none"> • Replacing one system by another does not in itself simplify matters. A benefit of the SSSI, SPA and SAC series is that they are underpinned by strong scientific evidence. The options presented in the Green Paper do not appear to be so. Either this is because the new designations will not be underpinned by science in the same way, or much more detail will need to be worked up in which case the benefits being proposed may reduce considerably whilst the costs from this significant churn will mount. • There is a significant risk that requiring Natural England (or Ministers) to renotify existing protected sites will become a job in itself and ironically take resources away from making space for nature in order to address an administrative task, what some have described as rearranging the designation deck chairs. • Changing to a new system will inevitably also bring confusion, teething problems and a new learning curve as it gets embedded. • It would be important to not lose the importance of those SSSIs which are of domestic but perhaps not international importance in the review process. • The Regulations for SACs and SPAs are effective at ensuring their needs are properly considered for developments that may affect them and we are concerned this might be weakened as some sites cease to have the highly protected status, or benefit from case law.
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	<p>In addition it is important that in undertaking reform that it recognises that there is a hierarchy of designated sites. The National Planning Policy Framework (NPPF 2021) for example requires planning authorities to distinguish between the hierarchy of international, national, and locally designated sites (paragraph 175). Similarly, current national planning policy states that sites of biodiversity value should be protected and enhanced “...in a manner commensurate with their statutory status” (NPPF, paragraph 174). While there may be some overlap between national (eg SSSIs) and international nature conservation designations (e.g. SPAs) the system must also reflect the diversity of designations and their different legal protections.</p> <p>We <u>do</u> believe there needs to a refresh for the context within which SSSIs sit given the effects of the climate emergency and so they link into (and can provide buffers to) a wider Nature Recovery Network. There does need to be flexibility to take account of changes brought about by climate change and we agree that the designation series is inflexible in this respect. But this can be achieved through the Local Nature Recovery Strategies and renotifications rather than blanket rewiring.</p> <p>There are some SSSIs, particularly within our upland National Parks where the original notifications do not account for the changes to nature and species distribution patterns brought by climate change. In those circumstances they are considered to be failing, where favourable status might be an unrealistic objective to seek to achieve given climate changes that have already happened and/ or are locked in. We would welcome working with Natural England on a prioritised number of SSSIs within National Parks where existing land management practices (as set out in notifications) are not optimal for nature – such as burning. We would like to see how they could be amended to better take into account the effects of climate change.</p> <p>The Green Paper is largely quiet on the role of sites of local (county) wildlife significance, yet in many places they can be important, and even</p>
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	<p>equivalent to designated SSSIs. How will they be considered within any new system needs to be worked through.</p> <p>In addition what would be the implications of the proposed changes for those SSSIs designated for their Geological interest?</p> <p>Finally, the Green Paper refers to ensuring any review of sites or species does not reduce the current level of protection (page 10), and that decisions will be based on the best available science and evidence (page 9). This requires access to good information. Where gaps are identified in knowledge new research should be commissioned and the necessary evidence sought in order to make decisions. In essence, there should be no known unknowns.</p>
<p>8. What degree of reform for the marine protected area network do we need to meet our biodiversity objectives and commitments?</p> <p>Please tick the option you prefer and briefly explain your preference and what benefits or risks it may have in the free text box.</p> <ul style="list-style-type: none"> • Option 1: Reform including a tiered approach consolidating existing protected site designations and the creation of highly protected sites. • Option 2: Continuing to manage existing site designations (SACs, SPAs, and MCZs) similarly, streamlining our approach by to refer to them all as Marine Protected Areas (MPAs). • Option 3: Amalgamation into a single type of designation with a scale of protections. • Other • No reform • Do not know 	<p>No response</p>
<p>9. Do you agree that there should be a single process for terrestrial designation?</p>	<p>No.</p>

<p>We would be particularly interested in your views on how this might best be done for example, should decisions be vested in the appropriate authority [ministers] on the advice of its nature conservation bodies?</p> <p>Please tick the option you prefer and explain your answer in the free text box.</p> <ul style="list-style-type: none"> • Yes • No • Unsure 	<p>The Government has through the Nature Recovery Green Paper reinforced the need for decision making based on scientific evidence. NPE supports this approach.</p> <p>A Minister, inevitably, is bound to consider a broader range of factors if they were to become responsible for the designation process. They could also be subject to counter-lobbying which seeks to avoid designation for non-nature recovery reasons. This risks undermining the reliance on science goal highlighted elsewhere in the Green Paper.</p> <p>As such, we believe Natural England should continue to be responsible for designating SSSIs and any new designations emanating from the Nature Recovery Network. They are best placed to adopt objective science-based decisions that further nature and landscape objectives.</p>
<p>10.Should we reform the current feature-based approach to site selection and management to also allow for more dynamic ecological processes?</p> <p>We would be particularly interested in your views of how our sites can be made more resilient to climate and other natural changes and can encompass wider purposes such as carbon sequestration. Briefly explain your answer in the free text box.</p> <ul style="list-style-type: none"> • Yes, for both terrestrial and marine sites • Yes, for terrestrial sites only • Yes, for marine sites only • No, neither for marine not terrestrial sites • Unsure 	<p>Yes, for both terrestrial and marine sites.</p> <p>We welcome the desire to put nature recovery at the heart of protected sites, to simplify without ‘degrading’ the environment and to pursue broader purposes that accommodate climate change and wider networks of habitats that are based on wider ecosystems rather than single habitats. Done well, it could make a real difference to enhancing the environment in the places where our aspiration should be greatest.</p> <p>We would like to see more detail on what is meant by ‘dynamic ecological processes’, perhaps with a few examples to be able to consider the implications of this proposal more fully.</p>
<p>11.How do we promote nature recovery beyond designated protected sites?</p>	<p>This is an important question and National Parks England believes there is considerable potential for promoting nature outside of the SSSI, SPA, SAC series. Our National Parks have been established, in part, to conserve and enhance their wildlife. The English National Parks contain almost 30% of the land in England that has been recognised as being of international importance for wildlife and contain some of Britain’s rarest wildlife.</p>

	<p>Our National Parks provide a summer or winter home for 86% of England's threatened bird species; a home to 87% of our priority butterfly species, and 90% of resident dragonfly species. They contain 80% of upland chalk grassland, 41% of upland hay meadows, 60% of the country's upland heath, and 99% of Europe's lowland heath. A lot of this important habitat will not be within designated sites but will fall within protected landscapes. As such, NPAs are very familiar at working to improve nature at landscape scale, and beyond individual sites. Enabling nature recovery does not require, but may be assisted by, a formal designation. We would be happy to host visits and discussions between those involved in pioneering landscape scale nature recovery work and Defra officials if that would be helpful.</p> <p>We see the new Nature Recovery Network and Local Nature Recovery Strategies as being key to bringing coherence and responding to the challenge of non-designated areas. For now, we would also highlight the following:</p> <ul style="list-style-type: none"> • A series of exciting nature recovery projects included within National Parks England's Compendium - Supporting People, Places, Climate, and Nature (see Section 3 in particular) • The need to integrate protected landscapes into Defra/ Natural England's work on designated protected sites to enable better join up • The need to similarly ensure synergy between work underway on ELMs, nature recovery, and protected landscapes, building on the <i>Farming in Protected Landscapes</i> (FiPL) programme. • Using Conservation Covenant as a mechanism by which buffering and linking protected sites could be achieved. • Supporting additional Landscape Recovery Projects and catchment partnerships
12.Do you see a potential role for additional designations?	Yes

<p>Please provide detail in the free text box.</p> <ul style="list-style-type: none"> • Yes • No • Unsure 	<p>National Parks England is excited by the prospect of building a Nature Recovery Network, and very keen to work with our partners through National Park Management Plans to ensure our National Parks are pivotal to that network as core sites. In this way the principles of the Lawton report – bigger, better and more joined up – can be delivered.</p> <p>There is definitely a need for more space for nature and to identify and prioritise nature recovery sites, including within our protected landscapes. This requires a proactive approach that safeguards opportunities and facilitates action. NPAs have already been working with communities and landowners, with ‘calls for sites’ to identify potential areas for attention. This has empowered people to take responsibility for identifying opportunities for nature recovery in their area. We see the opportunity to identify new sites beyond the existing SSSI/NNR/ SPA/SAC series as exciting.</p> <p>Further detail is needed on the criteria, policy significance, rules to be applied, and resources to be allocated for management of these sites, and how they would be integrated in Local Nature Recovery Strategies.</p> <p>We remain open as to whether these new areas require a formal designation.</p> <p>A criticism levelled at past designations is that they have tended to determine land management or planning decisions up to their boundary, and no more. If we are to secure significant improvements in nature recovery we need a more flexible approach that ensures areas, corridors or zones for improvement can be linked up, identified as sites for investment and incorporated into mapping exercises as Local Nature Recovery Strategies are developed.</p> <p>If the spatial planning system can properly embed nature recovery into its policies and operations then an additional designation may not be necessary. However, if spatial planning continues to be quite map-based then it may be necessary to create a designation in order that</p>
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	<p>they can be formally identified and protected within Local and Neighbourhood Plans and decision making.</p> <p>If a new designation (whether formal or not) is proposed, we would stress the need for these exciting new areas to be properly integrated with the existing protected sites rather than stand alone, with sufficient investment directed at both, to achieve a coherent network.</p>
<i>Protected sites: site management and protection (page 13)</i>	
<p>13. Do you agree we should pursue the potential areas for reforms on assessments and consents?</p> <ul style="list-style-type: none"> • Yes • No – keep as it is • No – reform but not these areas or additional areas (please state why) 	<p>Yes</p> <p>The protections afforded to national and international nature conservation sites under the existing legislative frameworks play a central role in protecting significant areas of our National Parks.</p> <p>In the New Forest National Park for example, over half of the land area is designated as being of international importance for nature conservation (e.g. SPA, SAC and Ramsar designations). These legal protections have helped conserve and enhance the habitats and species to a greater extent than National Park status for the area could afford.</p> <p>Habitats Regulation Assessments may be criticised in some circles for being overly complex and not proportionate. But it should be remembered that the Regulations are about protecting the jewels in the crown of our designated sites so it's right that they set a high bar.</p> <p>It is vital that any reforms aimed at the unification and simplification of processes and regulations would also maintain the same high level of protection for the designated sites. A failure to maintain the protections afforded would run counter to the whole aim of the Government's nature recovery strategy. If the Government is minded to agree a new single assessment process then we are concerned about</p>

	<p>the implications of moving so far from existing process that case law is no longer relevant and would seek reassurances on this point.</p> <p>Reference is made in the Green Paper to <i>'increased use of mitigation and compensation designed to maintain habitats and species strategically across the protected sites network'</i>. This needs to be handled very carefully. Whilst NPAs have provided examples of projects that could be used in the National Biodiversity Net Gain Register, as local planning authorities we also recognise that mitigation and compensation should be local to the area impacted in the first instance.</p> <p>As we have highlighted elsewhere in our response a key necessity for the successful delivery of any consent process will be adequate resourcing. This is vital to provide an accessible and robust system, both in terms of protecting sites from damage/degradation and also creating a more efficient service.</p> <p>From a practical perspective, closer working between Natural England and Local Planning Authorities (including NPAs) would be helpful. There have been occasions where guidance has been issued with little notice, creating difficulties for LPAs to put systems in place. This is exacerbated when guidance is amended or supplemented soon after. This can cause planning applications to suddenly stall when early engagement could have allowed LPAs to get the necessary protocols in place. We would welcome collaboration and joint working between relevant nature conservation bodies and LPAs on the implementation of any new system and support guidance.</p> <p>Separately, more consideration needs to be given to what is happening on neighbouring land to some protected sites because it is the land management activities taking place on neighbouring land that presents a significant risk to the protected site. e.g. risk of wildfire or lack of predator control.</p>
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<p>14.Should action be taken to address legacy consents?</p> <p>If 'Yes', we would particularly welcome your views on how this might be done in a cost-effective and fair way explaining your answers in the free text box.</p> <ul style="list-style-type: none"> • Yes • No • Unsure 	<p>Yes</p> <p>We would agree that legacy consents do need to be addressed and support the work already underway through Natural England to do this.</p> <p>If the original interest has been lost then the reason for the loss needs to be understood. The fact that it once existed should mean that such sites should be obvious contenders for OECM's if favourable management prescriptions can be put in place.</p>
<p>15.Should we move to this more outcomes-focused approach to site management?</p> <p>Please tick the option you prefer and briefly explain your preference and what benefits it may have in the free text box.</p> <ul style="list-style-type: none"> • Yes, using Site Improvement Plans • Yes, but building on Site Improvement Plans to offer a holistic site outcome plan • No • Other • Unsure 	<p>Yes, using Site Improvement Plans</p> <p>We see a continuing role for Site Improvement Plans. They are useful and an improvement on a list of damaging activities. The existing Site Improvement Plans should be given a higher status and profile through these reforms. Currently many contain useful information and sound objectives, but their delivery is not being driven forward by:</p> <ul style="list-style-type: none"> • not being adequately communicated; • limited monitoring of progress against the agreed objectives; and • poor resourcing to enable the actions to be achieved. <p>If these problems could be addresses, NPE sees SIPS having the potential to play a much more central role in site management.</p> <p>In our experience, SIPs are quite variable in how far they have been developed. Sometimes the issues affecting site condition are due to factors off-site. Some SIPs do include connectivity and outside pressure matters which are very useful in planning. But generally, SIPs have less influence on off site activity. In the future there need to be stronger links made between SIPs and the nature recovery network, LNRS so that designated sites are managed in a wider network/landscape context and can increase resilience for species.</p> <p>It is important that these documents remain flexible in order that they can change iteratively</p>

	<p>according to ongoing monitoring of the site and local circumstance. They also need to have locally agreed objectives to be meaningful, rather than generic, and to reference aspirations/expectations of neighbouring protected sites to support continuity.</p> <p>As a consequence, NPE does <u>not</u> support them becoming statutory. Maintaining greater flexibility would also enable clearer alignment to be made with the more outcomes based approach proposed under the new Environmental Land Management System.</p>
<p>16.Do you have suggestions for how regulation 9 requirements should be reformed to support delivery of England’s 2030 species target or other longterm biodiversity targets and to improve our natural environment?</p> <p>Please set out your answer briefly explaining what benefits it may have in the free text box.</p> <ul style="list-style-type: none"> • Yes • No • Unsure 	<p>The Government-commissioned ‘Habitats Regulations Assessment Review Working Group’ established the principle that the reforms should maintain or enhance existing protections and we support this. The existing Regulations have helped to protect some of the most important sites within our National Parks and the reforms must not dilute these protections. The use of the ‘precautionary principle’ has provided clarity and a clear bar in decision-making and we would not support this being replaced with a more discretionary decision-making process.</p> <p>We support the principle of reviewing the Regulations to create clearer expectations of the required evidence base at an early stage of the HRA process - for example, building on the concept of a site improvement plan. Greater use could be made of the available conservation advice and screening tools (for example impact risk zones) in decision-making. These measures can help protect biodiversity and contribute towards the delivery of the 30 by 30 target.</p> <p>We also believe more could be done by regulatory bodies to strive for greater consistency.</p> <p>Nature conservation designations do not in themselves necessarily ensure an improvement in species and habitats. Currently, even the Habitats Regulations that legally protect SAC, SPA and Ramsar sites only ensure that there will be no harmful impact on the integrity of the protected site – this protection, therefore, does</p>

	<p>not deliver a 'net gain' in nature, but simply that it does not deteriorate. Therefore, it is imperative that the legal protection provided by the Habitats Regulations is maintained and there is a strong case that these Regulations should be strengthened to ensure an improvement or recovery in nature, similar to the approach taken with the recent biodiversity 'net gain' requirements (where a minimum increase of 10% new gain in biodiversity is required).</p>
<p>17.Do you have suggestions for how processes under Regulation 6 of the Conservation of Offshore Marine Habitats and Species Regulations 2017 and sections 125 to 127 of the Marine and Coastal Access Act 2009 together could better deliver outcomes for the MPA network?</p> <p>Please explain your answer, these regulations are shared with devolved administrations, and therefore careful consideration will be given to any potential effects on these duties, with full evaluation following this consultation.</p> <ul style="list-style-type: none"> • Yes • No • Other • Unsure 	<p>No response</p>
<p>18.Do you have suggestions for improving the EIA scope and process for the Defra EIA regimes?</p> <p>We would particularly welcome your views on how they can more effectively help to reduce the environmental pressures outlined in chapters 3 and 4, deliver the objectives in the Environment Act, and facilitate sustainable development.</p> <p>Please tick all regimes that apply and explain your answer in the free text box.</p> <ul style="list-style-type: none"> • Yes – Marine Works EIA regime • Yes – Forestry EIA regime • Yes – Agriculture EIA regime • Yes – Land Drainage EIA regime • Yes – Water Resources EIA regime • No • Unsure 	<p>The requirement for Environmental Impact Assessments (EIAs) plays an important role in existing environmental protection. The Green Paper suggests that changing current EIA regulations should be done to facilitate sustainable development. EIA exists to improve decision making by ensuring social and economic priorities do not have a significant detrimental effect upon the environment. As such it should continue to have the environment its primary focus, rather than be evened out to take account of these other factors that are already prominent in the decision-making process.</p> <p>However, the current EIA framework is open to a degree of interpretation and is accompanied by a large amount of guidance and explanation (see the NPPF resource on 'Environmental Impact Assessments').The screening of Schedule 2 projects in 'sensitive areas' (such as National</p>

	<p>Parks) for example, can result in differences of opinion between local planning authorities and applicants, adding time and additional resources to the process. Although thresholds and criteria are provided for this EIA screening, there is still an element of discretion and interpretation built into the current process which causes delay. A reformed EIA system that addresses these areas of ambiguity, makes them more proportionate to scale and risk, providing they did not weaken levels of protection would be welcomed.</p> <p>In our experience, which includes as Local Planning Authorities:</p> <ul style="list-style-type: none"> • The decision-making processes seem powerless to prevent the cultivation of permanent pasture and semi-natural habitats and urgently need to be strengthened. Small areas of important previously unimproved land are being ploughed out / intensively managed yet can be outside of the scope of EIA, and NPE would welcome reforms to further protect these.
<p>19.What are your views on our proposal to establish priority areas for afforestation?</p>	<p>There are many reasons for afforestation. The extent to which afforestation will contribute towards nature recovery will depend upon the geographical location, ecology of the area, the species chosen, the density of planting, and a range of other factors. Afforestation of dense conifer plantations, for example, will not add to nature recovery efforts.</p> <p>In the first paragraph of section 4.1.2, the Nature Recovery Green Paper identifies how good native woodland habitats are for conservation. In the next two paragraphs it says how wonderful the nation's 250,000 ha of forests are (Public Forest Estate); referring them as valuable habitats. This risks being quite misleading given 71% in England and 85% UK wide are actually productive conifer forests not native broadleaved woodland.</p> <p>National Park Authorities are enthusiastic about creating new native woodland within National Parks that uphold Right Tree in the Right Place principles and enhance the landscape and nature</p>

	<p>of these special areas. Collectively we are committed to creating 36,850 ha of new native woodland. Afforestation must be carefully planned. We are also prioritising the management and restoration of open habitats such as heathland, peatland and wood pastures. These make huge contributions to the richness of the nation's biodiversity and many of them with National Parks are of national and international significance.</p> <p>We agree that the Forestry Commission should complete its aerial mapping programme to identify priority areas for afforestation. From the information contained within the Green Paper it is not clear to us how this mapping exercise will differ/ add value to the Forestry Commission's High, Medium and Low sensitivity mapping work already undertaken and available to view on the FC Map Browser. It is also unclear how this process will be integrated into that for preparing LNRS or take account of National Character Areas?</p> <p>Weather relying on new or existing mapping exercises we believe it is essential that this data is then ground truthed using local expertise – particularly in nationally protected landscapes. We have experience of where the mapping has both identified places that would be inappropriate for planting, and places where opportunities for new planting have been overlooked. NPAs would like, therefore to work closely with Forestry England to assist in this ground truthing exercise. Whilst national targets can guide activity, the final maps and decisions on planting need to be right for the place. For similar reasons we would not support the removal of EIA for forestry requirements within protected landscapes until more detail is provided.</p> <p>We see definite opportunity to grow woodland cover in our National Parks and have plans to achieve this. But this needs to be done in a way that is sensitive to their landscape, heritage and wildlife. NPE has agreed an Accord with the Forestry Commission and this provides a strong partnership for working closely together moving</p>
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	<p>forward. We would advocate the use of this Accord to guide new planting within National Parks.</p> <p>We see National Parks as being the nurseries for the Veteran Trees for the future. Where woodland planting on a landscape scale is locking up carbon, and providing a long term home for nature, for the enjoyment by people. This 'living carbon storage' provides a different emphasis to the afforestation that is proposed which aims to produce timber for shorter term uses and which relies on a 40-50 year cycle of planting.</p>
<i>30 by 30 (page 17)</i>	
<p>20.What are your views on our proposed criteria to achieving our 30 by 30 commitment?</p> <p>We are keen to hear views on the proposed approach for assessing Protected Areas set out under 4.1 and suggestions for areas of land we should consider as OECMs in England under section 4.1.0</p>	<p>National Parks England is supportive of the three criteria that are to be applied for determining whether an area is included within the 30 by 30 commitment but would recommend a fourth.</p> <p>A fourth criteria should be added that areas expected to contribute towards the 30 by 30 target must receive adequate resources. This is essential for land managers to be able to deliver expected outcomes and for the monitoring mentioned in bullet point three. Ecological monitoring takes time, costs money and cannot all be done by analysing aerial/satellite images. Trained ecologists will be needed on the ground. The need for resources will seem to be accepted implicitly by Government where further down in this section Defra identifies that if appropriate reform, investment, and management is implemented by 2030 then National Parks and AONBs will contribute more towards the 30% target.</p> <p>National Parks should be focal points for thriving nature. The Government commissioned Landscapes Review said in proposal 4 – “<i>National Landscapes should form the backbone of Nature Recovery Networks</i>”. NPE agrees.</p> <p>The English National Parks already contain almost 30% of the land in England that has been recognised as being of international importance for wildlife and contain some of Britain’s rarest</p>

	<p>wildlife. And according to Natural England data there is 191,000 ha of priority habitat which is not within a designated SPA, SAC or SSSI.</p> <p>Defra's view that National Parks and AONBs do not currently contribute towards the 30 by 30 target is misleading, in that there are many SACs, SPAs and SSSIs within National Parks and AONBs that do meet the proposed 30 by 30 criteria and as stated, these existing designations are expected to contribute towards the 30 by 30 target.</p> <p>Currently we estimate that 44% of land in National Parks is positively managed for nature conservation. Notwithstanding this, there will be plenty of areas that should be managed for nature recovery outside of these designated sites but within protected landscapes. Natural England data shows that of 191,000 ha of priority habitat found in National Parks, only 18,000 ha is in some form of agri-environment agreement. There is therefore a residual 173,000 ha of nationally important habitat that is currently not designated or being managed. This shows the scope for National Parks to make an even bigger contribution providing they have access to the resources and levers to influence management of these areas.</p> <p>Whilst a statutory purpose of the National Parks is the conservation <u>and enhancement</u> of these areas, the National Park Authorities have few tools beyond spatial planning to achieve this. The NPAs collectively own less than 2% of the land within National Parks. This means NPAs rely on the goodwill of other public agencies, private landowners and third sector partners to support nature recovery.</p> <p>The narrative related to Nature Recovery should highlight that National Parks hold the best remnants of nature and source populations for nature's recovery, albeit that they require more investment and attention to be as good as they could be. The opportunities for Nature Recovery in Protected Landscapes should be invested as a priority because they are places where the</p>
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	<p>biggest returns are possible and where projects can inspire nature recovery at scale.</p> <p>We also want to see other public bodies, including Defra ALBs do their bit within National Parks. The public and environmental NGO community rightly expect this of National Parks, yet currently there is no accountability mechanism for how those other bodies are contributing to our statutory purpose.</p> <p>We have already recommended Government:</p> <ul style="list-style-type: none"> • amend Section 11(A)(2) of the National Parks and Access to the Countryside Act 1949 to read:- “(2) In exercising or performing any functions in relation to, or so as to affect, land or the special qualities found in a National Park, any relevant authority shall further the purposes specified and the National Park Management Plan...” • insert to Section 11(A) of the National Parks and Access to the Countryside Act 1949:- “All relevant authorities have a duty to co-operate in the production of any relevant National Park Management Plans” <p>To continue the alignment of our protected landscapes, this would also require changes to be made to the Countryside and Rights of Way Act 2000 as well.</p> <p>Until legislation is forthcoming, we need Defra to envision what ‘furthering’ our statutory purpose would look like in each of the National Parks and AONBs, and help to facilitate that. We would welcome discussion on this with Defra.</p> <p>Natural England is currently working with NPE on a <i>New Outcomes Framework</i> to guide National Park Management Plans. In theory this would require ALBs to sit down with each NPA to work how much habitat they would pay to restore in each National Park. We need Defra to envision what ALBs ‘furthering’ our statutory purpose would look like in each of the National Parks and AONBs and help to facilitate that.</p>
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	<p>Separately, we would support the comments of others who have stressed the need for any system to align with international standards given the 30 by 30 commitment is to show leadership on the world stage.</p> <p>Whilst we support in principle ‘Other Effective Area Based Conservation Measures’ being considered under the 30 by 30 commitment, this is an additional term – not currently used - which may add to the public’s confusion over the network of protected sites. How will this be integrated into Local Nature Recovery Strategies or the new designation for nature recovery which the Government is considering?</p>
<p>21.What are your views on our proposal to reform forestry governance and strengthen protections for the Nation’s Forests?</p> <p>We are keen to hear views on any additional powers and statutory duties we should consider that would help to deliver on the benefits of woodland beyond timber production.</p>	<p>Agree.</p> <p>We understand the Government is considering providing FC with additional duties to protect nature and promote biodiversity. NPE would support this though believe the Government should go further. Given FC already has duties under Section 102 of the <i>Environment Act</i> 2021 to further biodiversity we believe the new duty should seek to ‘further biodiversity’ rather than just protect or promote it, and should be reflected in the remit of all sectors of the Forestry Commission (ie. Forest Services, Forestry England, and Forest Research) along with the necessary expanded powers to deliver these duties.</p> <p>To understand what role our nation’s forests could play in helping to achieve 30 by 30, one must first understand the composition of the current forest resource. As stated on page 17 of the Forestry Statistics 2021, 85% of the Nation’s Forest are conifer woodlands and only 15% mapped as broadleaved woodland. This would explain the statement in the second paragraph of section 4.1.2 of the Green Paper that most of the the nation’s forests “sit outside of existing protected areas”. If the Government wish to see the nation’s forest “make an important contribution to achieving our 30 by 30 target” then it is clear that the focus must be on diversifying the species composition of these</p>

	<p>forests towards establishing more native woodland habitat akin to that mentioned in the first paragraph in section 4.1.2.</p> <p>Tree establishment will be key to the UK Government's plan to achieve net zero by 2050 but it would be good to have clarity on the UK's definition of net zero. Is it that of the net zero standard in that the nation will reduce its greenhouse gas emissions by a minimum of 90% and only offset a maximum of 10%? This approach has been recommended to Defra by the Carbon Trust on page 227 of the Defra Carbon Footprint Report 2019-2020 published in March 2022. Being clear on the scope of the greenhouse gas offsetting required will help inform the role that the nation's forests can play in delivering that goal.</p> <p>We agree with the Green Paper that <i>"Trees and woodlands will also play an increasingly important role in supporting green recovery by stimulating markets for wood products as renewable resources"</i>. However, it is likely, for the reasons previously stated, that the species of tree needed to stimulate the green recovery (conifers) are likely to be different from those needed to realise the Government's nature recovery targets, (broadleaves). A more equal blend of the two will be needed, moving the English conifer/broadleaves ratio away from its current 71%:29%. NPE therefore recommends two commitments be made:</p> <ul style="list-style-type: none"> • to diversify the nations forests, for example to say 60%:40% by 2050 as an initial target; and • to significantly increase the % of broadleaved species.
22.What are your views on our proposal to adjust forestry permanency requirements for certain project types?	<p>We understand that the Forestry Commission already has powers to set aside the current permanency powers established under the <i>Forestry Act 1967</i>, for example when implementing its Open Habitats Policy or removing trees from sensitive archaeological sites that should not be replanted upon. As such, we do not believe that there is a requirement to</p>

	<p>have a blanket ban on the removal of the permanency requirement.</p> <p>We do recognise that the permanency requirement can be an impediment to new planting in some circumstances. In some cases there may be <u>good reason to discontinue</u> a permanency requirement:</p> <ul style="list-style-type: none"> • for example where historical afforestation has not followed <i>Right Tree Right Place</i> principles and/or where peatland restoration would be a preferable land use. • Or for woodland creation schemes identified as biomass crops as such woodlands are likely to have a limited role in meeting nature recovery targets. <p>We also believe there are some cases where removing the permanency requirements any reforms should <u>not</u> be allowed. This includes:</p> <ul style="list-style-type: none"> • where it would go against proposals that have been agreed as part of a planning obligation; or • where it would go against a Conservation Covenant. <p>NPE would welcome attention being given to powers to drive the restoration of plantations on ancient woodland PAWS back to a more natural state.</p> <p>We would support further investigation about the merits of this proposal. We do seek greater clarity on the Government's interpretation of 'wider variety of circumstances' as this is vague and could cover a plethora of circumstances. In the meantime, we believe the precautionary principle ought to be applied and the requirement removed only in certain cases (see above).</p>
30 by 30: UK Marine Strategy (page 21)	
23. Do you agree with the proposed changes to the UK Marine Strategy (UKMS) delivery programme, and if not, what other changes	No response

<p>would you make to streamline the reporting of UKMS?</p> <p>Please explain whether you agree with these changes and provide reasoning. If required, please outline any additional proposed changes that will help us achieve the stated goals. When you respond please highlight your experience and make us aware of any evidence you can share that supports your view.</p> <ul style="list-style-type: none"> • Yes • No • Unsure 	
<p>24.Do you support the approach set out to split the high-level Good Environmental Status (GES) target into individual descriptor level GES targets?</p> <ul style="list-style-type: none"> • Yes • No • Unsure 	No response
<p><i>Protecting Species (page 22)</i></p>	
<p>25.Do you agree we should pursue the potential areas for reforms for species?</p> <ul style="list-style-type: none"> • Yes • No – keep as it is • No – reform but not these areas or additional areas (please state, why) 	<p>Yes</p> <p>National Parks England would support species protection reform, providing undertakings were made that there would be no weakening of the protection afforded to different species compared to that currently in existence as a consequence of European legislation.</p> <p>We believe that discussion on reform of species legislation should involve close engagement with the devolved Parliaments to ensure synergy between neighbouring countries.</p>
<p>26.Based on your knowledge and experience please can you tick the criteria below that you think we should use to determine what level of protection a species should be given?</p> <p>You can tick more than one box.</p> <ul style="list-style-type: none"> • Threat of local or national extinction • Welfare of wild animals • Controls in trade 	<p>We would support use of all the criteria listed in the Green Paper:</p> <ul style="list-style-type: none"> • Threat of local or national extinction • Welfare of wild animals • Controls in trade • Importance to the ecosystem (a species that has a disproportionate beneficial

<ul style="list-style-type: none"> • Importance to the ecosystem (a species that has a disproportionate beneficial effect on an ecosystem and if they are not present the ecosystem will be in danger of collapse). • Promoting recovery (a species with a low or declining population, which may not yet have a threatened conservation status, but could be protected to support recovery and increased distribution). • Importance to genetic biodiversity (endemic species or sub-species within England that are important for the wider genetic diversity of the species). • Management requirements (a species where management is required for public health, to protect agriculture, commercial interests and to protect habitats) • Socio-economic importance (a species that could be protected to benefit people and communities, for example, to promote tourism) • To support efforts to reintroduce species or rewild habitats. • Unsure • Other – please state, why 	<p>effect on an ecosystem and if they are not present the ecosystem will be in danger of collapse)</p> <ul style="list-style-type: none"> • Promoting recovery (a species with a low or declining population, which may not yet have a threatened conservation status, but could be protected to support recovery and increased distribution) • Importance to genetic biodiversity (endemic species or sub-species within England that are important for the wider genetic diversity of the species) • Management requirements (a species where management is required for public health, to protect agriculture, commercial interests and to protect habitats) • Socio-economic importance (a species that could be protected to benefit people and communities, for example to promote tourism) • To support efforts to reintroduce species or rewild habitats. <p>We would add that:</p> <ul style="list-style-type: none"> • Socio Economic criteria is important but not when that's given superiority over achieving the ecological requirement of that or competing species. • Some of the criteria seem to contradict each other whilst some will apply to some species not others. • There is a need to separate out species protection from re-introductions, Invasive non-natives, and pest control as they are all different issues.
<p>27.What proposals should we look at to improve our current licensing regime?</p> <p>When you respond please state what you think is not working under the current licensing regime, which principles you think should be brought out in any new regime.</p> <p>Please highlight your experience, as well as making us aware of any evidence you</p>	<p>EPS licencing works well where Natural England is resourced properly.</p> <p>Low impact licences are an important tool where impacts are likely to be very small as these reduce administrative burden. Whilst we see some value to district licencing we remain cautious about further roll out of this.</p>

can share that supports your view.	
<p>28.What proposals do you think would make our enforcement toolkit more effective at combatting wildlife offences?</p> <p>When you respond please highlight your experience, as well as making us aware of any evidence you can share that supports your view.</p>	<p>We would support:</p> <ul style="list-style-type: none"> • Support stronger penalties, with any harmonisation leading to stiffer penalties; • Ensuring local police are well resourced and trained to be able to prioritise wildlife crime investigation.
<i>Delivering for nature through public bodies (page 24)</i>	
29.What are the most important functions and duties delivered by Defra group ALBs to support our long-term environmental goals?	No response.
30.Where are there overlaps, duplication or boundary issues between ALBs, or between ALBs and government? How could these be addressed?	<p>We believe that whatever arrangements Defra comes to over its ALBs there is a good case for looking at the geography of how bodies work together. After all, everything happens within a place. This would be consistent with taking a more spatial approach as advanced in the Levelling Up White Paper.</p> <p>Form needs to follow function. If protected landscapes are to be the backbone of the Nature Recovery Network – as recommended in the Landscapes Review – then it is vital that Defra, its ALBs, other Government departments and bodies:</p> <ul style="list-style-type: none"> e) Provide alignment when it comes to operating in and close to protected landscapes; f) Investment is prioritised in these places first, to enable them to be better, bigger, and then more joined up, g) Synergies are identified so that public money delivers public goods efficiently in these places, whichever institution the budget resides in; h) Collaborative working across boundaries and institutions based around agreed priorities in the statutory management plans for these places.

	<p>Whilst work has been underway to enable better integration in the strategic programmes between the different Defra ALBs, we not aware of this being used to determine how they can work more effectively to deliver nature recovery (or indeed other) outcomes in protected landscapes.</p> <p>The statutory National Park and AONB Management Plans already provide a key mechanism to take forward the nature recovery strategy and cover almost a quarter of the country. They are placed based plans – not for the institutions created to support the designation, but rather for everybody with an interest in the future of that area. As such we would welcome Defra envisioning how things would be different if its ALBs were to ‘further’ national park and AONB purposes and the objectives in these management plans?</p> <p>Currently a lack of resource or frequent staff turnover can mean that at a local level, some ALBs need to operate as a regulator first and foremost. Whilst important, if we are to achieve nature recovery we need to look beyond this to how different bodies can work in genuine partnership with proactivity beyond the statutory minimum.</p> <p>NPE has previously highlighted concerns about the lack of integration between protected landscapes and local nature recovery strategy boundaries. Protected Landscapes already have statutory management plans in place that include the conservation and enhancement of nature as a primary statutory purpose. We hope their role, as primary documents for the backbone of the Nature Recovery Network will be properly recognised in planning for the network. A failure to do so risks hampering nature recovery efforts for those protected landscapes that cover many administrative boundaries</p> <p>Finally, if National Parks are to be the backbone of the Nature Recovery Network then a strong signal of this would be to enable the transfer of public land holdings (that might include National Nature Reserves or Local Wildlife Sites within National Parks) to the relevant NPA, with the</p>
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	associated funding and mechanisms to manage them.
31.What are the benefits and risks of bringing all environmental regulation into a single body?	No response
32.What are the opportunities for consolidating environmental delivery functions into a single body? Which programmes and activities would this include?	No response
<i>Cost recovery (page 25)</i>	
33.Please provide your views on how more effective cost recovery for regulation would affect: a) environmental protections b) businesses.	Cost recovery for regulation should be a deterrent to environmental harm and so has a meaningful impact in changing damaging practices.
34.What is the most efficient way of ensuring businesses and regulated persons pay an appropriate share of the cost of regulation	No response
<i>Financing nature recovery (page 26)</i>	
35.What mechanisms should government explore to incentivise the private sector to shift towards nature-positive operations and investment?	See answer to Q 36
<p>36.What level of regulation is needed to incentivise private investment in nature while ensuring additionality and environmental integrity?</p> <p>What else should government be doing to facilitate the development of a market framework that provides investors, farmers and land managers, regulators and the public with confidence in the quality of privately financed nature projects?</p>	<p>National Parks England welcomes the support shown in the Green Paper for the Revere partnership between National Parks and Palladium on nature-based solutions. This is exciting work that has led to 11 pilot projects funded from both public and private sources. Revere is aiming to lever in at least £200m+ of private finance into UK National Parks by 2030. One obvious way in which the Government could assist would be to invest in this work itself.</p> <p>Government can also help by developing markets for carbon and biodiversity credits. A credible centralised 'one stop shop' for investors and landowners / managers could provide the information needed for stakeholders to make informed choices and would take some of the suspicion and uncertainty away from this emerging field.</p>

	<p>Regulation could ensure that all schemes were accredited in some way to ensure that the quality of projects is maintained and delivering against the investment priorities of the investor (eg delivering the appropriate biodiversity or carbon credits). A precautionary approach should be adopted around unintended negative consequences that could lead to unethical practices.</p>
<p>37.What financial impact do you think the proposals set out in this green paper would have either on business (For example, landowners) or government?</p> <p>Please let us know if you feel these proposals would have a significant impact on your business area, or if you think they would have an impact on public funds. For example, this could be about costs or if you think certain proposals would have a positive financial impact or create opportunities.</p> <p>Please tell us in what way you think these impacts would come about, which proposals would drive that change, and try to evidence any financial estimations of costs or benefits</p>	<p>National Parks England and key partners are clear that the ambition and need for nature recovery in National Parks far exceeds the public funds currently available.</p> <p>As highlighted elsewhere in our response the English NPAs have been working together to take forward a Wildlife in England’s National Parks Delivery Plan together. This has ambitious plans to deliver 20% of the Government’s nature targets in 10% of the land. To do this will require collaborative working between public, private and third sectors.</p> <p>To unlock additional resources for nature recovery at scale in England’s National Parks, we estimate will cost in the region of £4.5m in the next three years alone. This would enable us to create a <i>Nature Recovery Scaling Team</i>. £4.5m would equip all National Parks to establish a new dedicated small team that would be tasked with creating a pipeline of fundable projects and apply for and secure funding for this work at scale. It would also enable a central resource to drive this forward, co-ordinate activity, share learning, and engage with other partners at a national level. This would be a real catalyst for this work, enabling positive outcomes at scale, and build on the National Parks Authorities’ record as test beds for innovation.</p> <p>Considerable work has already been undertaken to collate what work is already underway within National Parks on nature recovery. Our Delivery Plan sets out how we aim, working with others, to create, restore and improve the management of around 145,000ha of habitat in England’s National Parks including:</p>

	<ul style="list-style-type: none">• achieve 36,850 ha of new native woodland created;• 170 km of freshwater system improvements;• 55,350 ha of grassland and heathland restored; and• 53,650 ha of peatland restored. <p>To achieve this scale of nature recovery will require significant investment (we estimate in the region of £800m) from a range of public, private and third sector sources between now and 2030.</p>
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