

# Evidence for the Lords Environment and Climate Change Committee's Inquiry on Protected Areas - Submission by Wildlife and Countryside Link, March 2023

1. We welcome the UK Government's commitment to protect 30% of land and sea by 2030, in line with the Global Biodiversity Framework agreed at COP15. This is an important pledge, with the potential to help reverse the decline of nature in the UK and create a healthy natural environment for all to benefit from and enjoy. This pledge will have to be implemented in each of the four countries, including England. The Government must also provide the UK Overseas Territories with adequate resources and encourage collaborations with UK conservation bodies to ensure that 30x30 target extends to the UKOTs.
2. The 30x30 pledge should effectively protect the most valuable sites for nature in England to create a resilient, thriving ecological network, connected and buffered by the wider Nature Recovery Network on land, and supported by the integration of nature across the country. Implementing 30x30 will be essential to help achieve Government's legally-binding target to halt the decline of species abundance by 2030.
3. To make 30x30 meaningful, at least 30% of land and sea must be (1) protected for nature in the long-term and (2) well-managed for nature and regularly monitored to demonstrate good or recovering condition. The Government set out robust criteria for 30x30 in its Nature Recovery Green Paper, broadly in line with IUCN guidance, but the Environmental Improvement Plan appears to signal a move away from this robust approach.
4. The terrestrial and freshwater areas in England that should, where well-managed, contribute to 30x30 are protected sites, which are primarily designated for biodiversity, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, and Sites of Special Scientific Interest (SSSIs).
5. The most highly protected terrestrial sites are SACs and SPAs which are given a higher level of protection by the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), including by a legal requirement to assess potential impacts on protected sites. SACs/SPAs [have been found to be more effective](#) than SSSIs, which are protected by the Wildlife and Countryside Act 1981. Ramsar sites are treated as SACs/SPAs as a matter of policy. Although the Habitats Regulations remain England's most effective protections for nature, they are facing assault on multiple fronts, through the Retained EU Law Bill, Levelling Up and Regeneration Bill, and Energy Bill.
6. Protected sites in England are largely in poor condition for nature: [only 37% of SSSIs are in favourable condition](#). While [49.8% are classed by Natural England as 'Unfavourable – Recovering'](#), this only means that sites are covered by a management plan, not that the plan is being implemented or nature on these sites is recovering. In reality, the condition of these sites is largely unknown and the true figures could be much lower, as [only 22% of SSSIs have been monitored](#) in the past six years. The main drivers of poor condition in SSSIs are lack of appropriate management, overgrazing, and the [burning of moorlands](#).
7. Our 2022 analysis of 30x30 progress showed that only [3.22% of England's land](#) is currently protected for nature in the long-term and well-managed for nature to ensure good or recovering condition (land protected for nature in an SSSI, SAC, SPA or Ramsar site and well-managed to ensure favourable condition).
8. Protected landscapes, National Parks and Areas of Outstanding Natural Beauty (AONBs), have great potential for nature recovery. However, as the [Government has acknowledged](#), because National Parks and AONBs were not set up specifically for the protection of biodiversity, currently nature benefits from no additional protection simply because it is inside a protected landscape. Protected nature sites within protected landscapes [are in poorer condition](#) than protected sites outside them. If strengthened and adequately funded, portions of protected landscapes could contribute to 30x30.
9. Other Effective area-based Conservation Measures (OECMs), including National Nature Reserves (NNRs), that meet the IUCN's assessment criteria will have to be assessed for inclusion in 30x30 on a case-by-case basis. If a particular OECM is effectively managed and delivering good ecological outcomes, it could be counted towards the 30% target.
10. Achieving 30x30 on land in England is possible but requires urgent and concerted action by Government to:

(A) Abandon deregulatory proposals that would undermine the Habitats Regulations, as trailed in the Nature Recovery Green Paper and enabled by the Levelling Up Regeneration Bill, Energy Bill, and Retained EU Law Bill. Apply the highest levels of legal protection offered by the Habitats Regulations to all protected sites. Expand the protected sites network to at least 10% to 16% or more by implementing Natural England's SSSIs review, the UK SPA Reviews and by designating important remnants of habitats such as ancient woodland, Important Invertebrate and Plant Areas.

(B) Strengthen National Parks and AONBs by giving them a nature recovery purpose, strengthening the duties on relevant bodies to further these updated purposes, improving Management Plans for nature's recovery, and giving all relevant bodies duties to contribute to and report on the delivery of Management Plans. If strengthened and adequately resourced to deliver nature recovery, portions of these protected landscapes could contribute to 30x30. The Government should use the Levelling Up and Regeneration Bill to take forward these reforms, as recommended by the Glover Landscapes Review and [accepted in the Government's response](#).

(C) Use wider conservation planning and management tools such as conservation covenants, Local Nature Recovery Strategies, the Nature Recovery Network, Biodiversity Net Gain, and the Environmental Land Managements scheme to identify, fund and implement nature management measures. Only where land in these schemes meets the two criteria above could they count towards 30x30, but these tools have a vital role in supporting nature recovery across the country.

11. A maximum of [8% of England's seas](#) are effectively protected for nature. Although 40% of English seas are designated as Marine Protected Areas (MPAs), only a small proportion have implemented management measures and monitoring. Due to poor monitoring, this figure could be much lower. Some management measures (e.g., managing fishing activity, including banning the use of bottom-towed gear) have been implemented in some MPAs, but this is only in a very small percentage of England's seas. Even in these areas, nature may continue to be at risk due to the weak enforcement capabilities of regulators, combined with the threat of development and external impacts from outside MPAs. There are currently no areas of English waters fully protected from all extractive or damaging human activities. By 2030, at least 30% of English waters should be fully or highly protected and managed for nature's recovery (within fully protected MPAs or licensed to allow only extremely limited activity, within wider ecologically coherent networks).
12. Highly Protected Marine Areas (HPMAs) offer the best opportunity to recover our seas by providing robust protection from all damaging activities. However, currently there are only plans to designate three pilot sites (against the recommended 'bare minimum' of 5 pilot sites which cover a range of environments outlined in the Government's [Benyon Review](#)), representing [under 0.5% of English seas](#).
13. To achieve 30x30 at sea in England, the Government must:
  - (A) Implement the initial HPMAs pilot sites and designate further HPMAs sites to achieve, as an absolute minimum, a third of English seas protected for nature in HPMAs by 2030.
  - (B) Implement whole-site management measures to protect all MPAs by 2024 through the MMO byelaw protection programme and placing conditions on licenses to revoke permissions to fish. Provide sufficient funding for effective management, monitoring and enforcement of MPAs to deliver conservation goals.
  - (C) Deliver marine spatial planning and prioritisation, with a plan for offshore wind, a well-protected MPA network and fishing activity within sustainable levels.
  - (D) Introduce policies that will increase the connectivity of areas of habitat and ensure, where possible, sites of similar features are not separated by more than 40-80km, to ensure a connected network across England's seas.
  - (E) Implement the last UK SPA review from JNCC which highlights the need for a review of SPA provision in the marine environment for at least 49 species.
14. Properly managing England's protected areas for nature, on land and at sea, to ensure they are in good condition or recovering condition will require significant investment and action and must be delivered to achieve 30x30 and halt the decline of nature by 2030.

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Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 70 organisations to use their strong joint voice for the protection of nature.

This response is supported by the following Link members:

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