



Lords debate on Environment and Climate Change Committee report (11.09.24): An extraordinary challenge: Restoring 30 per cent of our land and sea by 2030 Wildlife & Countryside Link Briefing

The report

In July 2023, the Lords Environment and Climate Change Committee published its assessment of the then Government's progress in delivering on the commitment to protect and manage 30% of land and sea for nature by 2030 (known as 30x30). The report, entitled 'An extraordinary challenge: Restoring 30 per cent of our land and sea by 2030', concluded that 'the Government is clearly not on course to meet 30x30'. It made the following core recommendations to address this policy shortfall:

'Achieving 30 by 30 requires more areas to be protected and those areas must comply with international criteria. Existing protected areas need to be better managed to achieve favourable condition and they need to be better monitored to enable effective management planning and to measure improvement.'¹

The assessment and set of recommendations were spot on. Link's latest report on Government progress towards 30x30 was published in October 2023 and echoed the conclusions of the Environment and Climate Change Committee, setting out how only 3.11% of land and up to 8% of sea could then be considered to count towards 30x30.² Given that the UK Government first committed to 30x30 in 2020³, and renewed that commitment when becoming a signatory to the Global Biodiversity Framework at COP15 in 2022 and again when publishing the UK's national contributions towards the global targets in 2024⁴, this represents a slow rate of progress.

As the House Lords debates the Environment and Climate Change Committee report on 11th September, a year on from publication, this briefing highlights developments from the intervening 12 months. It presents an updated picture of 30x30 progress in England (the nation in which UK Government can directly advance 30x30), reports on policy recommendations from last year (both those taken up and those still to be adopted) and proposes actions the new Government can swiftly take to put 30x30 back on course. The debate and briefing precedes Link's latest annual report on 30x30, which is due to be published in autumn 2024.

30x30 progress over the past 12 months

On land

The amount of land effectively protected for nature has remained static

¹ <https://publications.parliament.uk/pa/ld5803/ldselect/ldenvcl/234/234.pdf>

² <https://wcl.org.uk/30-by-30-progress-report.asp>

³ <https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity>

⁴ <https://www.cbd.int/article/cop15-cbd-press-release-final-19dec2022> ; <https://ort.cbd.int/national-targets/my-country/part-1/7C459F44-F96F-938F-F72B-0113FF30CA30/view>



The Sites of Special Scientific Interest (SSSI) network should provide a foundation stone for 30x30 on land, as SSSIs cover 8% of England.⁵ The poor condition of many of these SSSIs, however, preclude their inclusion in 30x30; sites need to be both protected and effectively managed for nature in order to contribute to the target. The condition of SSSIs in England has been steadily declining over the last decade. Climate change, water pollution and overgrazing are among the top reasons for habitats and wildlife in these protected areas suffering.⁶

The 2023 Environment and Climate Change Committee report recommended that the then Government urgently address this, through the publication of 'a clear plan with realistic targets to deliver steady progress on moving more SSSIs into favourable condition'. This recommendation was not taken up and SSSIs have continued to deteriorate. In 2023 36.82% of SSSIs were in favourable condition, and therefore 3.11% of England's total land area could be said to be effectively protected for nature (Link currently only judges SSSIs in good condition as being suitable for inclusion in 30x30).⁷ A year on, those figures have now declined to 34.67%⁸ and 2.93% respectively.⁹

The decline in the proportion of sites in favourable condition between 2023 and 2024 is due to changes to assessment and monitoring processes by Natural England, which are welcome and increase the accuracy of site condition assessments. The figure of around 3% effective protection on land in England is broadly unchanged from Link's first assessment of 30x30 progress in 2022.¹⁰

It is concerning that, halfway through the decade leading up to the 2030 target, the proportion of land in England that can contribute to 30x30 has not meaningfully increased since the commitment was first made.

No new protected sites have been designated

The Environment and Climate Change Committee report also called for a plan to increase the extent of SSSIs, to cover more of the ground needed for 30x30. The last Government failed to act on this recommendation, perpetuating a longer term stagnation. The last major period of expansion in the SSSI

⁵ SSSI's and sites protected by the Habitats Regulations are known as the protected areas network. As the vast majority of Habitats Regulations sites are also designated as SSSIs, the terms SSSI network and protected areas network are often used interchangeably: <https://www.gov.uk/government/statistics/england-biodiversity-indicators/1-extent-and-condition-of-protected-areas--2>

⁶ <https://designatedsites.naturalengland.org.uk/WholeEnglandReports.aspx>

⁷ As of 14 August 2023, 406,032.61 ha of SSSIs are in 'Favourable' condition, divided by total England land area (to mean high water mark) of 13,046,154 ha, means that 3.11% of England's land is in SSSIs in good condition, meeting the 30x30 criteria and contributing to the 30% target.

⁸ Data from: <https://designatedsites.naturalengland.org.uk/WholeEnglandReports.aspx>, accurate to 6 August 2024.

⁹ As of 6 August 2024, 382,257.45 ha of SSSIs are in 'Favourable' condition, divided by total England land area (to mean high water mark) of 13,046,154 ha, means that 2.93% of England's land is in SSSIs in good condition, meeting the 30x30 criteria and contributing to the 30% target.

¹⁰ https://www.wcl.org.uk/docs/WCL_2022_Progress_Report_on_30x30_in_England.pdf



network took place between 2001 and 2004, when 19 new SSSIs were designated.¹¹ Since 2005, coverage has remained at around 8%.¹²

This frozen coverage stands at just half the level that scientific evidence suggests should be strictly protected and managed for nature to create a resilient ecological network in England. A thorough scientific assessment of the actions needs to create resilient ecological networks in England, published in the Journal of Applied Ecology in 2018, recommended that the Government should 'at least double the area being protected (currently 8%) by designation'.¹³ Two Government commissioned reviews carried out in 2016¹⁴ and 2017¹⁵ also called for the network to expand, to cover more sites critical to the survival of threatened species such as hen harriers and puffins.

Significantly increasing the extent of the protected areas network and putting all SSSIs into good condition, would better protected these endangered species, create a resilient ecological network and take England half of the way to 30x30. Without such a step up in the extent of the network, 30x30 achievement will simply not be viable.

Some progress has been made in protected landscapes

Other land designations will also need to play their part if 30x30 is to be achieved, including protected landscapes (National Parks and National Landscapes, formerly known as AONBs). The Environment and Climate Change Committee recognised in their report that the lack of a statutory driver for nature recovery in protected landscapes was a barrier to more land within these landscapes being effectively managed for nature and contributing to 30x30. As a result of this lack, nature within protected landscapes is typically in no better condition than nature outside these areas.¹⁶ The Committee's report recommended that: 'National Parks and AONBs are given at the next legislative opportunity an additional statutory duty to protect nature to sit alongside their existing purposes.'

The last Government did not take up a viable legislative opportunity to adopt this recommendation. A cross-party amendment to the then Levelling Up & Regeneration Bill in autumn 2023 to create a nature duty for protected landscapes was rejected by the then Department for Levelling Up, Housing and Communities (DLUHC).¹⁷ DLUHC did eventually adopt a compromise protected landscapes amendment which included a new duty requiring public bodies to seek to further the statutory purposes of National Parks and National Landscapes and a requirement on the Secretary of State to pass regulations compelling protected landscape management plans to set how the relevant protected landscape would

¹¹ <https://hansard.parliament.uk/Commons/2004-04-30/debates/d79c1f48-eb65-4462-914d-75794f3afd5b/SitesOfSpecialScientificInterest>

¹² <https://www.gov.uk/government/statistics/england-biodiversity-indicators/1-extent-and-condition-of-protected-areas--2>

¹³ <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2664.13196>

¹⁴ <https://data.jncc.gov.uk/data/d1b21876-d5a4-42b9-9505-4c399fe47d7e/ukspa3-status-uk-spas-2000s-web.pdf>

¹⁵ <https://users.aber.ac.uk/mec/Publications/Reports/Benefits%20of%20SSSIs%20final%20revised%20report%20June%202011.pdf>

¹⁶ <https://www.cnp.org.uk/health-check-report/>

¹⁷ https://www.wcl.org.uk/docs/Levelling_Up_Bill_Protected_landscapes_12.09.23.pdf



contribute to the achievement of Environment Act targets.¹⁸ These regulations will boost nature-management within protected landscapes, and with it their contribution to 30x30, but have yet to be introduced to Parliament.¹⁹

Swift publication of the regulations required under section 245 of the Levelling Up & Regeneration Act 2023, and renewed consideration of a new nature purpose for protected landscapes, is necessary to maximise the contribution National Parks and National Landscapes make to 30x30.

Draft criteria for 30x30 on land have been published

The previous Government did act on one Environment and Climate Change Committee recommendation, publishing draft criteria of what should count towards 30x30 in December 2023.²⁰ The draft criteria states that to count towards 30x30, areas need a purpose for biodiversity, protection from harm to biodiversity, and to benefit from 'effectively manage[ment] in order to deliver positive long-term outcomes for biodiversity.' This approach is consistent with the 30x30 criteria that Wildlife and Countryside Link has set out and used in all previous reports evaluating England's progress towards 30x30 on land.²¹

These criteria should now be formalised, through engagement with the nature sector and reference to international guidance on OECMs published by the IUCN²². The final criteria should be at least as robust as the draft 30x30 criteria and should be applied to guide the identification and reporting of Other Effective area-based Conservation Measures (OECM) to contribute to 30x30. OECMs, which could include well protected and managed nature reserves and eNGO sites, if in good or genuinely recovering ecological condition, will build on the SSSI network and contributions from protected landscapes to fill in the remainder of 30% on land.

At sea

Some progress has been made on stronger MPA protections

Marine Protected Areas (MPA) cover over 30% of English seas with a conservation designation, but shortfalls in protections against damaging activities within their boundaries means they do not automatically qualify for 30x30 inclusion. The most damaging of these activities is 'bottom-trawling,' the dragging of heavy weighted fishing nets across the ocean floor, to the detriment of fragile marine ecosystems. Since 2022, the UK Government has been working with the Marine Management

¹⁸ <https://www.wcl.org.uk/docs/Levelling%20Up%20Bill%20briefing%20-%20Nature%20recovery%20-%2006.10.23.pdf>

¹⁹ https://www.wcl.org.uk/docs/Link_briefing_Protected_Landscapes_regulations_and_guidance_April2024.pdf

²⁰ https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf

²¹ See:

https://wcl.org.uk/assets/uploads/img/files/WCL_2023_Progress_Report_on_30x30_in_England_1.pdf p15

²² <https://portals.iucn.org/library/sites/library/files/documents/PATRS-003-En.pdf>



Organisation (MMO) to use bye-laws to ban bottom-trawling around particular features within MPAs in English waters. As a result, approximately 9.7% of English waters are now protected from the most damaging forms of fishing. This is an increase of around 1.7% on 2023 figures, due to 13 new by-laws to protect MPA features being put in place in March 2024.²³

This is welcome progress, but more needs to be done to fulfill the 2023 Environment and Climate Change Committee recommendation to 'better regulate the use of bottom trawling at sea, particularly in MPAs and move to a more holistic site management approach at sea'. Out of the 17 byelaws put in place since 2022, only 4 cover the entire MPA. This means that the remaining 13 byelaws prohibit bottom trawling only in certain areas of the MPA they cover, whilst large amounts of the MPA remains exposed to the activity. In such partially covered MPAs, it can cost fishers more in fuel to go around the restricted area, than to pay the fine to fish in it, creating an incentive to breach the byelaw. Only when a whole site approach is in place across MPAs can the network can deliver its full contribution to 30x30.

No progress has been made on HPMA

Highly Protected Marine Areas (HPMAs) are intended to provide the highest possible levels of protection for areas of the sea which are critically important for ocean recovery. The first three HPMA were announced in early 2023²⁴, with the expectation of more to follow. The Environment and Climate Change committee reported reiterated a recommendation from the House of Commons Environment, Food and Rural Affairs Committee for an ambitious timescale for the designation of more HPMA.²⁵

The previous Government did not produce such a timetable, and the total number of HPMA stands still at three, covering just 0.42% of English waters. The MMO is also yet to publish the relevant byelaws to enshrine these HPMA into law. This should take place swiftly, along with the expansion of HPMA to cover 10% of English waters. This expansion should be accomplished within the current Parliament to boost efforts to achieve 30x30 at sea.

Draft criteria for 30x30 at sea have not been published

The Government is yet to publish criteria which states what counts towards 30x30 at sea, including the definition of 'effective management measures.' The criteria must be published soon, and clarify whether

²³ <https://www.gov.uk/government/news/bottom-towed-fishing-gear-prohibited-over-reef-habitats-in-13-marine-protected-areas>

²⁴ <https://deframedia.blog.gov.uk/2023/03/03/defra-announces-highly-protected-marine-areas-to-be-designated-in-english-waters/>

²⁵ https://committees.parliament.uk/publications/40588/documents/197985/default/?_gl=1*e6axbw*_up*MQ..*_ga*_MTc0NjQxODk5LjE3MjQ4NDg0MDQ.*_ga_9684J19FT4*_MTcyNDg0ODQwMy4xLjAuMTcyNDg0ODQyMi4wLjAuMA..



MPAs in poor and/or recovering condition with management measures in place²⁶ can be considered under 30x30.

30x30 opportunities for the new Government

The new Government has come into office with a mandate for nature recovery, off the back of a manifesto that promised to 'deliver for nature'.²⁷ Before the election, then Shadow Secretary of State for the Environment, Food and Rural Affairs, Steve Reed MP, promised that Labour would 'halt the decline of British species by 2030' and 'honour our international agreements to protect 30% of our land and seas by the same date'.²⁸ On taking office in July, Mr Reed announced that his department would 'introduce a new, statutory plan to protect and restore our natural environment, with delivery plans to meet each of our ambitious targets'.²⁹

This welcome commitment to a new plan for nature restoration, based around a review of the existing Environmental Improvement Plan (EIP)³⁰, provides an opportunity to progress key Environment & Climate Change Committee 30x30 recommendations. The new statutory plan should feature a chapter on 30x30 delivery on land and at sea, including funded and time-bound commitments to introducing:

- Assessment, monitoring and management measures to move more SSSIs into favourable condition, including to meet the Government's own interim and legally-binding protected sites targets.
- A new programme of designations to rapidly increase the extent of the SSSI network, drawing on the recommendations made in the 2016 and 2017 reviews of protected areas.
- The new protected landscapes regulations requiring management plan contributions to achieving Environment Act targets, along with a review of the case for a new statutory nature purpose for national parks and national landscapes.
- The final guidance on OECMs in England, in line with international standards, and a programme to help identify and support potential OECMs to contribute to 30x30.
- Byelaws banning bottom-trawling across all offshore MPAs in England by the end of 2024.
- A new programme for further HPMA designations, with a target of 10% coverage by 2030.
- Publish criteria which states what counts towards 30x30 at sea, including the definition of 'effective management measures.'

The plan should also consider how the Government's plans for the delivery of new housing and renewable energy at scale can interact with 30x30 delivery. This interaction can and should be a positive one; changes to the planning system on land and at sea could reaffirm protections for foundation sites

²⁶ For example, an MPA where fisheries management measures apply but increased infrastructure development is preventing the recovery of designated features.

²⁷ <https://labour.org.uk/wp-content/uploads/2024/06/Change-Labour-Party-Manifesto-2024-large-print.pdf>

²⁸ <https://www.theguardian.com/commentisfree/2024/apr/25/britain-natural-landscape-tories-labour-sewage-pollution-waterways-extinction>

²⁹ <https://questions-statements.parliament.uk/written-statements/detail/2024-07-30/hcws47>

³⁰ <https://www.wcl.org.uk/government-review-of-environmental-improvement-plan-welcome.asp>



for 30x30, and secure funding streams from new development could help improve the condition of those sites.³¹

The inclusion of the above measures in the new Government's nature restoration statutory plan would mark a change in 30x30 trajectory, away from under-delivery and towards achievement. With COP16 this autumn requiring signatories to the Global Biodiversity Framework (GBF) to report on progress towards GBF goals including 30x30, the Government's statutory plan provides a chance for the UK to demonstrate global leadership on actually delivering on the ground.

A year on from publication, the recommendations of the 'an extraordinary challenge: Restoring 30 per cent of our land and sea by 2030' are more necessary than ever. We would be grateful if peers could use the debate on 11th September to highlight to the new Government how these recommendations can be progressed through the EIP review and new statutory plan, to put 30x30 back on track for delivery.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 85 organisations to campaign for the natural world.

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³¹ For more on these opportunities for alignment, see https://www.wcl.org.uk/docs/planning_ahead_on_land_and_sea.pdf & https://www.wcl.org.uk/docs/Planning_Reform_that_works_for_nature.pdf