



South East Nature Partnership (SENP) Response to the House of Lords Environment and Climate Change Committee Protected Areas Enquiry

The South East Nature Partnership Community Interest Company (CIC) consists of 6 LNPs (Local Nature Partnerships) in South East England. LNPs are playing an important role in development of Local Nature Recovery Strategies (LNRS) and have wide experience of facilitating nature recovery at county level. SENP exists to support and enhance the role of LNPs, while avoiding duplication. This response is to specific questions related to the Protected Areas Enquiry.

How can LNPs and LNRSs contribute to the commitment to protect 30% of land and sea by 2030?

- 1) "30 by 30" is a useful target that, if met, could make an important contribution to reversing the serious decline in environmental health. We note the conclusion of [Wildlife and Countryside Link's 2022 Progress report on 30x30](#), which flagged that only 3% of England qualifies because land should be both protected for nature and 'managed for nature'.
- 2) The role of Protected Landscapes within the 30x30 target is contentious as designation does not directly imply management for nature. However, they do provide a focus for greater protection and enhancement of nature and will be vital delivery areas for LNRSs across the country, with most preparing their own Nature Recovery Plans. Implementing [Julian Glover's recommendations](#) would be an important step forward to ensure they can play a bigger role in 30x30.
- 3) The LNRSs have a particularly important role in counties that do not have National Parks or large areas of AONB by setting out the 30% priority areas for focus in delivering protection, scale and connectivity. This could be delivered through other means such as planning control, Biodiversity Net Gain, conservation covenants, and long-term contracts for sale of ecological services or publicly funded agri-environment support working in combination with long-term legal protection.

LNPs currently play several roles in relation to the 30x30 target: -

- 4) Most LNPs have been actively preparing for the development of LNRSs. In the South East we have produced a set of joint principles for nature recovery networks. Following national guidance, LNPs will now step into a supportive role

for the new Responsible Authorities, bringing our collective expertise in stakeholder engagement to the local processes.

5) LNPs can contribute by using their cross-sectoral links, and partnership working, to produce LNRs that have strong local stakeholder buy-in. LNRs can contribute by setting out where and how the 30x30 target can best be delivered locally.

6) LNPs often champion Local Wildlife Sites. Many are of extremely high quality and value for nature and are often the only form of protected site found in our urban areas, yet the inadequate protections they provide against development and land use change mean that they are often at risk, so further protection would be needed for them to count for 30x30.

7) LNPs often support local 'State of Nature' reports and natural capital strategies at a county scale, which help to flag issues and trends which impact on designated sites.

8) Although not directly engaged in the management of sites, LNPs do regularly convene key stakeholders around the types of issues that affect these sites. The strength of LNPs lies in their wide representation and collaboration across public, private, and voluntary sectors.

In the development of LNPs and LNRs, what are the main challenges that you have faced, or anticipate as the process progresses, that could impact on protected areas?

9) The key challenge facing LNPs is making sure the LNRs do not sit on shelves and gather dust but are truly integrated into local plans and become as high a priority for delivery as any other local need. Nature recovery is fundamental to human health and wellbeing, crucial to our very survival, and the LNRs must be treated as just as important, if not more so, than other local plans.

10) The current lack of clarity about how LNRs will be considered within the planning system is already affecting stakeholder engagement as their role in protection of core areas of importance for nature is not known. Currently, public bodies will have to "have regard" to LNRs but there is doubt that this will, in practice, ensure greater recognition of LNRs within local plans/ planning decisions. Cynicism as to the value of LNRs must be avoided if they are to attract meaningful stakeholder engagement.

11) There is no clarity about how LNRs will be used to target Environmental land management schemes (ELM) payments. This hinders engagement with landowners who need to understand why they should engage in preparation of local strategies. It is hoped that LNRs will help to target investment in nature locally, but there is still a great deal of confusion as to how this will work in practice and more clarity on this is needed.

12) Where they are already in place LNPs, provide strong local relationships and a network of stakeholders to support Responsible Authorities. However, most were set up as voluntary partnerships with no funding from government. They are most effective where they have managed to secure a post within a partner organisation to drive their work forward, but this is vulnerable to ever-pressurised budgets within local government and environmental non-governmental organisation (eNGOs). Never has their role been more important

for nature and with ambitions to meet 30x30 targets yet more could be done to assist them locally to secure their future.

How could policy and practice regarding LNPs and LNRSs and their links with '30 by 30' be improved?

While LNRSs are a very welcome initiative, they will only be able to 'shift the dial' on nature's recovery if they can be delivered. This will require the following: -

13) Ensuring that our current protected areas system works. Inadequate funding for monitoring and enhancement means there is major work to be done. Some streamlining of designation processes is possible, but we warn against substantial changes to the existing designations system as this would result in serious delays to ongoing and urgent delivery for these sites.

14) Providing protection in some form for new areas for nature identified in LNRS to enable the nature recovery networks identified in each LNRS to be realised. Biodiversity Net Gain and Conservation Covenants may help to secure new areas for nature in the longer term but in general, much more will need to be done to shift the 3% towards 30%.

15) More work to develop sustainable funding models for nature recovery, beyond the welcome but limited potential within Biodiversity Net Gain.

16) Removal of disincentives for landowners to change land use from agriculture to habitat creation. Many farmers fear inheritance tax implications from dedicating land to nature recovery. We are pleased to see that the Treasury have opened a consultation on this.

17) Funding and capacity for the vital role of monitoring and reporting on the condition and extent of habitat and habitat creation locally. Our Local Environmental Record Centres provide an invaluable role but struggle to achieve the funding required to increase the impact of their role. In addition, there is an argument for government to fund LNPs in relation to their ability to collate partnership contributions towards 30 x 30 and broader Environmental Improvement Plan target reporting.

How effective is engagement by the UK Government and relevant statutory bodies, such as Natural England, regarding LNPs and LNRSs?

18) The appointment of Natural England LNRS local officers to support the LNRS has been welcome. Regular Nature Recovery Network and Environmental Improvement Plan newsletters are excellent and county advisors are proactive in ensuring LNPs and Responsible Authorities are being kept up to date with government announcements and publications. However, the delay in issuing guidelines for LNRSs was unhelpful.

19) Across LNPs in the South East there has been positive engagement from local representatives of arm's length bodies such as the Forestry Commission and Environment Agency. However, pressures on local resourcing of these bodies means that engagement can be limited. Even so, all have reacted positively to the role of LNPs in helping to prepare local stakeholders for the start of LNRS processes and have supported these 'readiness' discussions. Government could look to ensure that in addition to local LNRS Advisors within

Natural England, there are adequate resources to engage with and contribute to LNPs across the country.

20) Where LNPs are in place and actively building strong local relationships, this will result in more robust and ambitious LNRSs and the collaboration and enabling environment needed to secure their delivery. SENP, and the LNPs operating at county level across this wider region, have no statutory role or funding and exist largely due to goodwill, determination, and demonstration of their value. They should be considered for additional support from government as pivotal to the achievement of targets for nature and the achievement of 30x30.

Ends.

South East Nature Partnership 29th March 2023

Submitted by Dr Caroline Jessel, Chair of the South East Nature Partnership (SENP) on behalf of the following LNP Chairs that make up the SENP Board: _

- Kate Rice, Chair of the Sussex Nature Partnership.
- Richard Benwell, Chair of the Oxfordshire Nature Partnership.
- Sarah Jane Chimbwandira, Chair of the Surrey Nature Partnership.
- Dr Simon Lyster, Chair of the Essex Nature Partnership.
- Matthew Balfour, Chair of the Kent Nature Partnership.
- Allison Potts, Chair of Hampshire, and Isle of Wight Nature Partnership.