

CONSULTATION

Response Document



**Government response to the Landscapes Review
(Department of Environment, Food and Rural Affairs)**

9 April 2022

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

This response was coordinated by our [England Policy Group](#). We welcome the opportunity to participate in this consultation and we would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

General Comments

1. Do you want your responses to be confidential? If yes, please give your reason.

No

2. What is your name?

Chartered Institute of Ecology and Environmental Management

3. What is your email address?

JasonReeves@cieem.net

4. Where are you located?

South East

5. Which of the following do you identify yourself as?

Professional body

A stronger mission for nature recovery (p10)

6. Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2?

YES

There are some very positive statements in this section, for example Defra's recognition that protected landscapes cannot, in their current form, contribute towards the 30 by 30 target in their entirety, and that this does not reflect that many of our existing landscapes are now badly degraded, or the urgency of the fight to tackle biodiversity loss.

Protected landscapes will play a key part in delivery of environmental improvement plans. We welcome the alignment with the 25 year environment plan as noted on page 11 and this should continue with future plans.

We also welcome the recognition of the need to integrate protected landscapes into the development of local nature recovery strategies (LNRS). Designated landscapes, along with protected sites - protected for both national and international features, such as Sites of Special Scientific Interest (SSSIs) and Special Areas of Conservation (SACs), should form the backbone of the Nature Recovery Network. Additionally, we welcome the proposals for a more joined up approach to management being proposed, particularly in response to climate change.

We support the proposals for a strengthened purpose to actively recover nature and the proposed changes listed in accordance with the Glover review. Designated landscapes need ambitious targets for biodiversity recovery and a strong monitoring programme to inform management decisions and targets. Goals for nature recovery will need to be clarified - what is the goal habitat or quality?

Local Nature Recovery Plans will also need to feed into this, giving more weight to habitat recovery and protection in national landscapes.

7. Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage?

Resilience to climate change must be recognised, however this must be supported by strong guidance on what this means and how it relates to biodiversity.

Cultural heritage was specifically excluded in Environment Act so this provides an opportunity to bring the review in line with the 25 year plan and include heritage.

Agricultural transition (p12)

8. Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes? Tick all that apply.

- **Designing the environmental land management schemes in a way that works for all farmers and land managers, including the specific circumstances for those in protected landscapes, recognising that farmers in these areas are well-placed to deliver on our environmental priorities.**
- **Using Local Nature Recovery Strategies to identify projects or habitats within protected landscapes.**
- **Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions.**
- **Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes.**
- **Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.**

Yes - all of the above.

Clarity is needed on timescales for monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes, and when a review will take place.

It must be clear that real weighting and targeting is given to protected landscapes' habitats and features in ELMS. Defra will need to ensure this prioritisation is not lost when expanding the schemes.

We welcome the links with LNRS - ELMS will play a key role in maintaining coherence between LNRSs. There may be occasions where landowners would like to implement a particular project, but are not this the best place to do so. LNRS should inform this and support in guiding decisions.

9. Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes?

Farm advisors are crucial to supporting farmers in delivering ELMS in protected landscapes. This may be providing one-to-one advice, linking farmers up to share ideas and best practices, highlighting training and grant schemes that are available. Farm advisors need to listen and learn as much from farmers as vice versa for collaborative success. The role of a person carrying out the initial assessment creating a farm plan would carry significant responsibility. The range of skills and experience staff must have in order to support this work properly is broad, and CIEEM strongly recommends that this be conducted by qualified professionals with expertise in each subject area, as well as up to date knowledge on what is being targeted in the area's LNRS and why. For example,

anyone assessing the condition of existing habitats in terms of biodiversity, identifying those which are in good or poor condition, and subsequently advising on how to improve condition, would require input from a competent ecologist in each relevant habitat.

CIEEM has also recently worked with Plantlife and other members of the Back from the Brink partnership to produce new guidance for farm environment advice¹ covering undertaking farm visits and communicating effectively with farmers and land managers, management and monitoring of environmental interventions and developing a directory of habitat and species management advice. In addition, CIEEM has developed a Farm Environment Adviser Competency Framework² that covers sixteen key areas of expertise including farm management practice, economics, advice and funding for environmental land management as well as ecological surveying, assessment and mapping skills.

A stronger mission for connecting people and places (p14)

10. Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks?

YES

AONBs purposes should match those of National Parks. They are just as important for access to nature.

11. Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes?

YES

12. Are there any other priorities that should be reflected in a strengthened second purpose?

Managing visitor pressures (p16)

13. Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures? Tick all that apply.

- Issue Fixed Penalty Notices for byelaw infringements
- Make Public Space Protection Orders (PSPOs)
- Issue Traffic Regulation Orders (TROs) to control the amount and type of traffic on roads

14. Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes?

YES/NO/UNSURE

15. For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power?

¹ <https://cieem.net/i-am/current-projects/farm-environment-advice/>

² <https://cieem.net/resource/farm-environment-adviser-competency-framework/>

- Environmental protection
- Prevention of damage
- Nuisance
- Amenity
- Other [PLEASE STATE]

16. Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions?

- Yes – everywhere
- Yes – in National Parks and Areas of Outstanding Natural Beauty only
- Yes – in National Parks only
- No
- Unsure

17. What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc?

The role of AONB teams in planning (p18)

18. What roles should AONBs teams play in the plan-making process to achieve better outcomes?

We support AONB teams being fully considered in plan-making by making them full statutory consultees.

AONB teams will require additional resources, capacity and expertise, particularly ecological expertise, to deliver contributions to the plan-making process.

19. Should AONB teams be made statutory consultees for development management?

YES

20. If yes, what type of planning applications should AONB teams be consulted on?

- AONB teams should formally agree with local planning authorities which planning applications should be consulted on.
- **AONB teams should be consulted on all planning applications that require an Environmental Impact Assessment and are categorised as 'major development' as well as Nationally Significant Infrastructure Projects.**
- Other [Please state]

The AONB Management Plan should be consulted on all planning applications that require Environmental Assessment. Particularly where the planning application is in conflict with the policies in the AONB Management Plan.

Local governance (p20)

21. Which of the following measures would you support to improve local governance?

Tick all that apply.

- Improved training and materials
- Streamlined process for removing underperforming members
- Greater use of advisory panels
- Greater flexibility over the proportion of national, parish and local appointments
- Merit-based criteria for local authority appointments
- Reduced board size
- Secretary of State appointed chair
- Other [Please state]

All of above

Appointing Board members based on their expertise in protected landscapes' purposes is crucial, as well as increasing diversity within Boards. Boards should be balanced regarding areas of expertise.

A clearer role for public bodies (p22)

22.Should statutory duties be strengthened so that they are given greater weight when exercising public functions?

YES

Yes, the duty should be strengthened from the existing duty to 'have regard to' to a duty to 'further' the purposes of protected landscapes.

23.Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans?

YES

We welcome the forthcoming guidance for public bodies - we assume this will be open for consultation and look forward to engaging. Duties will need a monitoring and reporting system built in, similar to the NERC duty. Management plans must have robust monitoring systems and clearly set out how actions will be funded.

We support Wildlife and Countryside Link's call for more resources and joined up approaches between ELM, Local Nature Recovery Strategies, NGOs, Natural England, and Defra's Natural Capital and Ecosystem Assessment project. LNRS should be fully integrates into management plans, setting out how the management will seek to deliver LNRS priorities.

General power of competence (p24)

24.Should National Parks Authorities and the Broads Authority have a general power of competence?

YES

We would welcome changes that would give protected landscapes access to financial support to deliver purposes. This should be subject to clarifying the clear distinctions between their roles and those of the constituent local authorities so that there is no room for misunderstanding and the separation of roles and responsibilities remains clear.

Additional comments

25.If you have any further comments on any of the proposals in this document, please include them here.

The need to effectively monitor the state of nature in our National Landscapes and produce natural capital accounts, as identified in the document, is fundamental to direct management plans, prioritising actions and setting ambitious targets. We particularly welcome the proposal that the “national landscapes strategy will set the national ambition for the expected contribution of protected landscapes towards nature recovery and climate mitigation and adaptation, along with other key goals such as access and community engagement”. The proposals and timeline for bringing this forward should recognise the urgent need to address degraded nature in protected areas.

We are disappointed to see no action to address the call for management plans to be given strengthened statutory footing.

Protected landscapes purposes and plans should reference and work towards the statutory targets for halting species declines, and others when set in law.

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