



1st November 2021

By email: localnaturerecoverystrategies@defra.gov.uk

Dear Sir / Madam,

Local Nature Recovery Strategies: how to prepare and what to include - response from the Buckinghamshire and Milton Keynes Natural Environment Partnership

The Buckinghamshire and Milton Keynes Natural Environment Partnership (the “NEP”) represents organisations from the conservation, local authority, business, health, education and community sectors across Buckinghamshire and Milton Keynes.

As the area’s Local Nature Partnership, we work collaboratively to improve the environment and ensure it is appropriately taken into account in local decision-making. The NEP welcomes the opportunity to comment on the proposals in the LNRS Consultation.

The NEP was recently involved in the Pilot Area Team of the Buckinghamshire pilot LNRS process, and has used its extensive learning, its experience from areas of priority work and input from its partners to form this response. (Note, the views expressed here represent the position of the Bucks & MK NEP collectively, and are not intended to replace those individual views you may receive from our individual partner organisations)

Key points

The NEP’s answers to the specific consultation questions are provided in detail below.

However, there are, in addition, several key points that arise from the consultation document that either we would like to emphasise and/or do not fit neatly into what has been asked. We kindly ask that you to take note of these aspects also in your review of consultation responses and in producing the relevant guidance for the production of LNRSs.

- **Resourcing** – capacity, skills, funding and time

There is a clear need for appropriate resourcing (capacity, skills and funding) and, as was key learning from the pilot phases, realistic preparation timescales - to carry out the following essential LNRS stages:

- **Produce** LNRSs – the pilots noted that 8 months was not enough, and people / capacity resources were stretched – both in the local authority (responsible authority) but also among the organisations that are vital to support its production and success (e.g. Local Nature Partnerships, Wildlife Trusts, EA, FC, NE, etc). The pilots showed that expertise, skills and capacity needs related to ecological expertise, communications and stakeholder engagement needs, GIS and data expertise and for engagement with the farming sector;
- **Deliver their ambitions** locally over the long-term – including to ensure the ongoing management of identified priority areas for biodiversity to maximise the delivery of the opportunities identified. This includes the need for capacity among organisations to deliver the LNRSs and the availability of long-term, simple and integrated funding for local initiatives – rather than, as has often been the case with funding for nature’s recovery, short-term competitive funding made available within a short application period and delivery timeframes. These are not appropriate for truly integrated delivery for nature’s recovery. Funding could also be provided for green training programmes, aligned to LNRS priorities.
- **Monitor and review LNRSs** – monitoring of LNRS ambitions should be planned for and started from the outset; reviews of LNRSs will need similar capacity and skills to be planned for and will need funding.

- **Existing strategies**

The guidance should be clear on how to make use of existing, related environment, GI and biodiversity strategies of relevance to the LNRS preparation.

- **Data availability, access and consistency**

Key issues here are:

- Data availability nationally and locally, and access to, (given possible issues with data agreements, data ownership and access) of up-to-date, relevant data, and minimum consistent data standards and map formats;
- The need for, and availability of, expertise locally to sift, review and prepare data for use in the LNRS process (e.g. remove overlaps from different data sources);

- The importance of Local Record Centres in working together to produce data and mapping for LNRs;
 - The need for more up-to-date and complete baseline data – including updated priority habitat data and habitat condition data - on which to base the LNR process and decisions. Funding should be considered to allow each LNR area to conduct up-to-date surveys where this is missing.
- **Location** of the areas identified as priorities for biodiversity...
- ...relative to, for example, the demand for various ecosystem services – e.g. to local population centres to provide access to nature.
- **Connectivity and the Lawton Principles**
- Connecting areas of land managed well for nature can sometimes be more important than simple land coverage targets. **The Lawton principles of ‘bigger, better, more and joined’ must be priorities that run through the regulations, guidance and expectations for LNRs.**
- **Condition / quality of the land and how well managed it is**
- These factors are just as important as any coverage target.
- **All land is important**
- All land, whether identified as particular importance for biodiversity or not, could and should be managed better for biodiversity. The LNRs should acknowledge and cater for this.
- **Cross-border working**
- Guidance should include the need for cross-administrative-border working in producing an LNR; nature does not stop at administrative borders.
- **The Importance of integrating LNRs into other policy areas – e.g. planning and agriculture**
- To integrate goals for nature into planning, it is important that the relevant legislation and guidance for LNRs and in any upcoming planning legislation and guidance, recognise the importance of LNRs in guiding local development, how local development can contribute to the goals of LNRs, and require LPAs to contribute to LNRs and help to implement them in land use decisions.

Responsible authorities should align their LNRs with other key local policies and strategies that could affect nature's recovery – e.g. transport, the economy, public health, climate policies etc., as well as with neighbouring LNRs. In particular, LNRs should identify opportunities to mitigate and adapt to climate change.

Similarly, the Government must align the various policies and funding streams that relate to nature and the environment, including not just any reformed planning system, but also agricultural and climate policy.

- **The Important roles of Local Nature Partnerships (LNPs)**

LNPs, with their existing established networks across many sectors, will have an important role to play in assisting with the development of LNRs, including with engaging stakeholders, bringing together previous strategies, and in coordinating collaborative delivery and/or reviewing progress.

Resourcing for LNPs to undertake these important national roles locally must be appropriately catered for.

Responsible authorities should be bound by the duty to have regard to the views of LNPs in strategic planning matters such as LNRs.

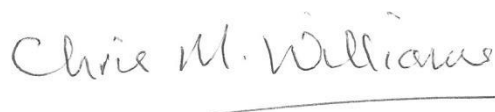
- **Use**

The guidance should be clear about how LNRs will be used.

We would be happy to discuss further with you any of these key points, or our specific answers to the consultation questions below.

Best wishes.

Yours faithfully,



Chris M Williams

Chair, Buckinghamshire and Milton Keynes Natural Environment Partnership

NEP's answers to the consultation question

(NEP responses provided in italics)

Q1 Would you like your response to be confidential? [Yes/No]

If you answered Yes to this question, please give your reason [Free text box] *N/A*

Q2 What is your name? [Free text box] *Nicola Thomas*

Q3 What is your email address? [Free text box]

nicola.thomas@buckinghamshire.gov.uk

Q4 What is your organisation? [Free text box]

Buckinghamshire and Milton Keynes Natural Environment Partnership

The procedure to be followed in the preparation and publication, and review and republication of LNRs

Achieving collaboration

Q5 Which of the groups listed below do you consider essential for the preparation of a Local Nature Recovery Strategies?

- Local authority(s) other than the “responsible authority”, where the Strategy covers more than one Local Authority area
- Local authorities adjacent to the Strategy areas.
 - Local Nature Partnership(s), where active and geographically aligned
- Natural England
- The Environment Agency
- The Forestry Commission
- Other public bodies e.g. Highways England
- Environmental non-governmental organisations active in the Strategy area
- National Park Authority(s), where present in the Strategy area and if not the “responsible authority”
- Area of Outstanding National Beauty organisation(s), where present in the Strategy area
- Local Records Centre(s), where separate from any of the other groups listed
- Local farming, forestry and landowning groups
- Local Enterprise Partnerships
- Utilities providers, such as water companies
- Other local business representative bodies
- Individual landowners and land managers (including farmers, both landowners and tenants)
- Individual businesses

- Members of the public
 - Don't Know
- [Tick all that apply]

All are needed.. All the groups and organisations listed need to be involved in the preparation of the LNRs. LNPs can have a particularly useful and key role, already having a partnership of organisations to bring into the collaborative work to prepare the LNRs, also to look to delivering them and reporting on their progress.

We would suggest that a “core” team of organisations could be set as a minimum nationally to ensure consistency across LNRs in their preparation – perhaps to at least include the local authorities, Local Nature Partnerships, NE / EA, National Park or AONB, LEPs, local Environmental Record Centres, local Wildlife Trust

Q6 Are there any organisations not listed above whose involvement you consider essential? [Yes/No/Don't Know] If yes, which ones and why? [Free text box]

The Lead Local Flood Authority and Internal Drainage Boards should also be involved. Planning policy leads from the local authority should form part of the LA involvement. Representation should also be sought from Catchment Partnerships and also from the health sector given the proven health and wellbeing benefits of connecting people with nature.

Q7 Do you think that additional support should be provided to farmers, landowners and managers in the land management sector to facilitate their involvement with the preparation of Local Nature Recovery Strategies? [Yes/No/Don't Know]

NEP response: Yes, experience from the pilot Buckinghamshire LNRS suggests that targeting this group via a convenor role worked well, and was needed to ensure the levels of engagement from the sector required to provide credibility to process and to ensure that the views of those whose land is being considered throughout the process are fully taken into account, and on whom the LNRS outputs may have real impacts. The convenor role must be accounted for in funding for the production of LNRSs.

Convenors may also be needed to engage other sectors too, for example the business and health sectors, to ensure they are also fully engaged in the process.

Q8 If information on other types of local wildlife sites within a Local Nature Recovery Strategy area is not held by the responsible authority, do you think that if another Local Authority owns the information they should be obliged to provide it to them? [Yes / No / Don't know]

Yes, although this needs to be on a sustainable business basis for the local records centres involved.

NB – “Local Wildlife Sites” have a specific meaning and it is not clear whether this is intended in the question, or whether the term has been used to refer to sites generally. LWSs are non-statutory sites selected locally by a panel for meeting agreed criteria for their wildlife value,

and can be among the best sites for wildlife locally. It is essential that LWSs must be considered in any LNRS and indeed the nation Nature Recovery Network. It is important that LWSs should be required to be added to the initial mapping at Step 1 of the production of an LNRS.

Q9 Are you aware of specific locally-held information that would make an important contribution to the preparation of Local Nature Recovery Strategies that you do not believe would be made available without a requirement to do so? [Yes / No / Don't know] If yes, what information should be included? [Free text box]

Development projects, including national programmes such as HS2, and East West Rail, as well as private development proposals, make assessments of the ecology of a site and area as part of the development process. It would be beneficial if this information was required to be published in an accessible format that could be added into any database/GIS system recording the biodiversity of an area.

Locally-identified wildlife sites should be added, along with the most accurate, up to date information, from both national and local datasets. National datasets could provide the basis and local data sets added from various partnerships and organisations. Expertise is likely to be needed and funded to assist in combing local data from the various organisations and deal with potential data and licensing, ownership and accessibility issues.

The national guidance could suggest the types of local datasets that should be added to the national sets – e.g. Local Wildlife Sites, local species data for priority species, hedgerows, tree data, land holdings and associated habitat data, biodiversity opportunity areas (locally-agreed), habitat potential modelling data and climate data from the Met Office local datasets.

While some datasets held nationally are easy to access (e.g. Natural England's developing Data Portal), others are not so, but could be helpful to the production of LNRSs. Other datasets, held nationally, can be expensive or difficult to access between partners who may be working on the LNRS, and consideration of how these barriers can be overcome and supported should be centred, for example, on data such as: UK Centre for Ecology and Hydrology's Land Cover Map; Ordnance Survey's MasterMap; national soils data; and hedgerows data.

As the LNRSs are also due to identify where and how best to provide broader benefits, as well as providing biodiversity and nature benefits, it is important that wider datasets, such as indices of multiple deprivation and access to local greenspace, are part of the local dataset. The NEP pulled together many different datasets a few years ago in producing its Green Infrastructure Vision and Principles document, which included, alongside biodiversity data, also:

- *Water data – highlighting flood zones, open water, rivers and waterways*
- *Access data – e.g. accessible GI, conservation reserves, open access land, cycle routes, designated local green spaces, canals, major footpaths and trails, open access land, public open spaces and rights of way, village greens, etc.*

We also took account of, for example, the location of major WFD watercourses, precious chalk streams, known allocated development sites from Local Plans, known major infrastructure routes (e.g. HS2, EWR), flood risk zones, existing and planned settlement sites, major roads (motorways and A roads, the AONB, etc. alongside flooding risk and impact data, water quality data and the index of multiple deprivation.

(More information can be found here, slides 5-8: <https://bucksmknep.co.uk/download/1236/> and at <https://bucksmknep.co.uk/projects/qi-opportunities-mapping/>)

We think it is important to allow enough time within the LNRS preparation process to identify, collect, collate and sift / clean (to avoid double counting) such local data, to ensure the best evidence base for determining the LNRS outputs via stakeholder consultation. This requires specific skills and expertise that will need resourcing to produce accurate, adequate, meaningful and credible outputs to set the local strategies for nature's recovery.

Q10 How do you think neighbouring Local Nature Recovery Strategy responsible authorities should be required to work together?

- **Required to inform neighbouring responsible authorities of their progress in preparing their Strategy**
- **Required to give information to neighbouring responsible authorities that would help them prepare their Strategy**
- **Required to collaborate when setting objectives for areas close to boundaries**
- **Left to local discretion**
- **Other [If other, please specify]**
- **Don't know [Tick one]**

Ideally, we would have ticked more than one option – at least 1, 2 and 3 should all apply here.

We believe information and data-sharing will be essential for the production of LNRSs where data may be held across administrative borders.

Each LNRS set of stakeholders should also have regard to (at least) the objectives being set by neighbouring authorities. Nature does not stop at administrative boundaries and the production of neighbouring LNRSs should recognise this – there could be opportunities for nature's recovery that straddle local authority borders. An understanding the progress of LNRSs in neighbouring authorities would be helpful, as would, sharing information on specific methodologies being used, where that is left to local discretion.

It is likely that some stakeholders, e.g. local wildlife trusts, some local nature partnerships and other such organisations, which span several local authority areas, are likely to be involved in the production of more than one LNRS. It could be that these representatives are made use of to support that collaboration, as well as requiring this of the lead authorities themselves. However, such an approach will require time and resources of those organisations so that they can be effectively involved in the production of more than one LNRS. This should be recognised and compensated for within the LNRS requirements.

Q11 Should draft Local Nature Recovery Strategies be subject to a local public consultation prior to publication [Yes / No / Don't know]

Yes. The NEP suggest that the public should be fully involved with the development of LNRSs as well as be allowed to formally respond to a draft prior to publication. That the public would have formed part of the set of stakeholders involved in the development of the LNRS should make this relatively straight-forward.

Q12 Should individual landowners or managers be able to decide that land they own or manage should not be identified by a Local Nature Recovery Strategy as an area that could become of particular importance for biodiversity? [Yes/No/Don't Know]

No.

For Local Nature Recovery Strategies to be able to identify the most suitable locations for Nature's Recovery, landowners must not be able to undermine that by excluding land.

If a landowner disagrees with the LNRS conclusions or chooses not to engage, this should not be a reason to exclude the land from the LNRS. However, it might be sensible for the process to include a way of hearing from a landowner as to why they think any land should be excluded.

Landowners should be fully involved in the LNR process and, as is made clear on page 30, land being included in the LNRS does not signal any compulsory acquisition of the land or change of ownership; indeed being mapped as an opportunity "...is recognition that it is a location where action will generate greater benefit for nature or the wider environment". (pg 30) and could help access funding: "For private organisations and individuals, having land they own or manage mapped as areas that could become of particular importance for biodiversity is intended to support their case for access to any additional sources of available public or private funding – such as future schemes that reward delivery of environmental benefits, or the provision of biodiversity net gain units to developers." (pg 17)

Q 13 Should anyone interested in the Strategy be able to propose additional areas that could become of particular importance if these can be shown to be making a sufficient contribution to the overall objective of the Strategy? [Yes / No / Don't know]

Yes.

It is important that LNRSs should involve broad stakeholder engagement and anyone should be allowed to contribute within that process. The process needs to be amenable to ensure all communities can access the process and are able to have a say; and there needs to be consideration given to the balance of broader stakeholder views and those of experts in biodiversity, ecology and landscape; there also should be consistency as to when stakeholders should be involved in the process. Land should be able to be put forward by anyone at the relevant stages of LNRS preparation or review.

Achieving consistency and resolving disagreements

Q14 How prescriptive do you think regulations made under clause 101 should be in setting out how the responsible authority should work with local partners?

- Setting broad principles only
 - Setting broad principles and specific requirements on who to engage or how
 - A standardised process of who to engage and how
 - Don't know
- [Tick one]

Our partnership has differing views as to whether option 2 or 3 should apply, although views converge around the need for a set of standardised requirements that responsible authorities could exceed should they wish to, according to local circumstances – somewhere between option 2 and option 3:

Option 2: allows for flexibility to local circumstances, although there should be some standardised requirements, e.g. on how neighbouring responsible authorities work together.

Option 3: This could involve a standardised process with a minimum requirement, so that there is local flexibility to exceed this if selected locally.

Q15 Do you think that regulations made under clause 101 should establish a mechanism for resolving disputes in the preparation of Local Nature Recovery Strategies? [Yes / No / Don't know]

Yes. In deciding the content of the LNRS, the responsible authority would have regard to comments made during any public consultation and throughout the LNRS engagement process. If matters remain unresolved, a process of mediation would be preferable prior to a formal dispute process.

Q16 If you believe that regulations made under clause 101 should establish a mechanism for resolving disputes in the preparation of Local Nature Recovery Strategies, which of the following bodies do you think should be able to raise a dispute (including on behalf of others)?

- Local Authorities within the Strategy area who are not the responsible authority
- Natural England
- Responsible authorities for neighbouring Strategy areas
- Other [Please specify]
- Don't know

[Tick all that apply]

Potentially all of the above, and also other organisations and landowners involved in the LNRS process. However it should be made very clear the reasons for being able to dispute the LNRS process – e.g. not following the process, more than simply not agreeing with the output map.

Q17 Which of the following do you think might be reasonable grounds for raising a dispute about the Local Nature Recovery Strategy preparation process?

- **Not adequately involving relevant specific groups**
- **Slow / no progress**
- **Lack of transparency**
- **Legal requirements not being followed**
- **Other [please specify]**
- **Don't know**

[Tick all that apply]

Legal requirements are likely to be the main grounds for raising a dispute. Legal requirements should set out (the minimum) groups to be involved, something about speed of process, transparency requirements, etc. so it is clear the basis on which a dispute is being raised. Disputes should centre on whether the process has been followed as required, rather than over the content.

Q18 At which points in the preparation of a Local Nature Recovery Strategy do you think it should be possible to escalate procedural disputes for external consideration?

- **Before finalisation of the Strategy priorities**
- **Before a potential public consultation on the draft Strategy**
- **If the responsible authority does not respond within a reasonable timeframe to being informed of concerns**
- **At any time**
- **There should not be a process for external consideration**
- **Other [please specify]**
- **Don't know**

[Tick all that apply]

At any time, but perhaps the earlier in the process the better, so a mechanism seeking resolution could possibly be more informal. This mechanism should be set out in the regulations. A Memorandum of Understanding between those involved in the preparation of Local Nature Recovery Strategies may help agree the approach and avoid disputes among the main organisations involved.

Q19 Do you think that Local Nature Recovery Strategies should also be “signed off” by a body other than the responsible authority before they can be published?

- **No**
- **Yes – instead of a mechanism for resolving disputes in the preparation process**
- **Yes – as well as a mechanism for resolving disputes in the preparation process**

- Don't know

[Tick one]

The NEP believes that the responsible authority should be the sign-off body; although in 2-tier areas all authorities within that geography should ideally also sign off the strategy (although this may depend on local circumstances – the responsibility should be agreed and set locally at the outset).

We do not think other external organisations need to be signing off the LNRS; if prepared according to the guidelines, the responsible authority will have engaged with local partners, and a wide range of stakeholders in its preparation. However, any disputes should be resolved before sign-off.

Alongside one responsible authority signing off the process and taking the responsibility to lead the process and ensure the robustness of the output (or, with two-tier authorities, likely sign-off by the other authorities within the geographical area), the NEP considers there should also be an option for other stakeholders to opt to “sign up” to the LNRS in support.

This would show the breadth of support for the strategy once complete, without the need for a formal sign-off process with multiple organisations. Sign-up could occur when the LNRS is published, but also any time afterwards.

Q20 If so, which bodies should be given sign-off responsibility?

- Other Local Authorities in the Strategy area
- Natural England
- Other [please specify]
- Don't know

[Tick all that apply]

N/A

Q21 On what grounds could a body refuse to sign-off a Local Nature Recovery Strategy?

- Disagreement about overall priorities
- Disagreement about specific priorities
- Disagreement about potential measures
- Disagreement about the inclusion or exclusion of specific “areas of potential importance”
- On any reasonable grounds
- Only the “responsible authority” should be required to sign-off the Strategy
- Other [please specify]
- Don't know

[Tick all that apply]

Only the “responsible authority” should be required to sign-off the Strategy, on any reasonable grounds, which should be set out in the regulations.

Q22 Should the Defra Secretary of State be able to appoint a separate body to consider disputes in the preparation of Local Nature Recovery Strategies, and if so, which body or bodies?

- It should not be possible for a separate body to be appointed
- Natural England
- **Planning inspectorate**
- Whichever body the Secretary of State considers appropriate
- The responsible authority for a different Local Nature Recovery Strategy
- Other [please specify]
- Don't know

[Tick all that apply]

Putting the responsibility with Natural England would make it difficult for them to work freely and fairly with the responsible authorities in preparing an LNRS. Instead, there could be efficiencies in requiring the planning inspectorate to take the role, as they have similar processes and procedures already in place.

Q23 In resolving disputes in the preparation of Local Nature Recovery Strategies should the Secretary of State be able to: ...

- **Require the responsible authority to repeat particular parts of the preparation process**
- **Require the responsible authority to make specific changes to their Local Nature Recovery Strategy**
- **Approve the Local Nature Recovery Strategy with or without changes**
- Something else [please specify]
- Don't know

[Tick all that apply]

This will depend on the dispute in question but could be any of the above.

Publication of Local Nature Recovery Strategies

Q24 Do you think that each local habitat map should adopt the same data standards and be published in the same format to facilitate national collation? [Yes/No/Don't Know]

We believe the answer to this question is three-fold:

- *Data sets to be used: we believe there should be a set of minimum required open source data sets to be used. Certain local data, including locally-identified wildlife sites, should be required to be added too. Responsible authorities should be able to go beyond these requirements should they wish.*
- *Data standards: Locally-held data is not always in a consistent format or standards but should be encouraged to be added, even if they do not meet the national set of data requirements / standards.*
- *Publishing: It would be helpful if the local habitat maps were published in a similar format to assist with national collation and cross-border collaboration. Consistency*

in presentation would be helpful, but should not prevent local variation to some degree. Perhaps the guidance could consider if there would be room for a higher-level output for the national NRN, which may be displayed at a different scale to what's needed locally? Or, a template / format could be provided.

Q25 If yes, how should this level of consistency be established?

- **Advice from Natural England**
- Creation of standard templates
- **Specified in regulations made under clause 101**
- By consensus amongst responsible authorities
- Other [please specify]
- Don't Know

[Tick all that apply]

The standards for any minimum set of data to be used from open source datasets should be specified in the regulations, and supported by advice from Natural England. But (see response to Q24) local datasets are not always in a consistent format and not meeting a standardised set of requirements should not prevent them being used where they represent the best available information locally to inform the LNRS.

Q26 Do you think that each statement of biodiversity priorities should also be published in a similar format?

- The format should be the same
- **There should be some specific requirements but the responsible authority should keep some discretion over presentation**
- The responsible authority should be able to decide how they present their Strategy so long as it meets legal requirements
- Don't know

[Tick one]

There should be some specific requirements over content, but the responsible authority should keep some discretion over presentation according to local conditions and previous work, provided it meets legal requirements.

Q27 Do you think that all Local Nature Recovery Strategies should be published together on a single national website as well as being published locally by the responsible authority?

[Yes/No/Don't Know]

This would ensure the statement in the consultation (page 22): "For Local Nature Recovery Strategies to perform their key role in underpinning the Nature Recovery Network the intention is for each local habitat map to be viewed alongside neighbouring areas so that in aggregate they form a national map of "opportunities" for nature recovery as a basis for adding to the Network". LNRSs should also be published locally.

Q28 Do you think that a published Local Nature Recovery Strategy should:

- Only be changed once the Secretary of State has been notified
- Only be changed with the Secretary of State's permission

- **Not be changed unless it's part of a scheduled review process (see below)**
- **Don't Know**

[Tick one]

While the full LNRS should be updated as part of a scheduled review process, it would be helpful for some discretion – for example, if a major new piece of information or data becomes available outside that process timescale that could affect the mapping and /or the LNRS priorities, then it should be at the discretion of the responsible authority to determine if a review and update of the LNRS is needed outside the scheduled LNRS review process.

Review and republication of Local Nature Recovery Strategies

Q29 Do you think that all Local Nature Recovery Strategies across England should be reviewed and republished at similar times or should there be local discretion to decide when is the best time?

- **Set nationally**
- **Decided locally**
- **Don't know**

[Tick one]

The NEP considers that there should be some national guidance on how frequently LNRSs should be reviewed, but which should take into account both:

- the alignment with the five-yearly reporting by public authorities in adherence to s40 of the NERC Act 2006 general duty to conserve and enhance biodiversity that will be required by the Environment Bill; and*
- local factors– e.g. in collaboration with others involved in its preparation, to align with local decision-making, and to take into account the timetable for the preparation of the Local Plan (ideally the LNRS will be prepared to inform the Local Plan).*

However, we note that the anticipated timing of the NERC reporting, which we understand will be within one year of the Environment Act, may not align with the production of the first LNRSs, with the guidance and requirements expected to be in place around April 2022, and LNRSs being produced some time later. The timetable for the production of LNRSs should be longer than the pilots had – most expressed 8 months was insufficient – and will also depend on resource and capacity to carry out the required processes and any timetable set by regulations or statutory guidance.

30. If you do think all Local Nature Recovery Strategies should be reviewed and republished at the same time, do you think that this should happen to a fixed cycle?

- **There should be a regular fixed period between reviews**
- **A maximum period of time between reviews should be set**
- **A minimum period of time between reviews should be set**

- A maximum and a minimum period of time between reviews should be set
- The Defra Secretary of State should be able to decide
- Don't know

[Tick one]

Although we do not think that LNRSs should all be reviewed and republished at the same time, we do think they should be reviewed and republished regularly, and a maximum time period should be set. This would allow some local discretion according to local decisions and processes, e.g. the NERC biodiversity reporting cycle, the timetables of neighbouring responsible authorities, or the Local Plan review cycle. We agree that around 5 years seems reasonable.

Information to be included in a Local Nature Recovery Strategy

Statement of biodiversity priorities

31. Do you think that all responsible authorities should take a consistent approach to describing the biodiversity in their Strategy area?

[Yes/No/Don't Know]

We believe that setting guidance on what should be included in the description of current biodiversity in an area would assist responsible authorities and ensure an element of consistency between them, including neighbouring areas. However, we also think that. Beyond guidance for a minimum set of content, local authorities should be given flexibility, or an expectation, to go beyond this to include information and content to account for local circumstances, including, for example, previous work already conducted regarding biodiversity and habitat priorities in an area should be used to inform the LNRS. For example, the Bucks & MK NEP, the Local Nature Partnership of the area, has recently relaunched its Biodiversity Action Plan, which builds on but updates a previous BAP and will act as the interim biodiversity strategy until LNRSs are in place – and will be hugely helpful in setting the background for the LNRS, and in thinking about the upcoming priorities.

Q32 If yes, do you have a preference as to how sub-areas based on similarities in biodiversity should be identified?

- No preference
- Responsible authorities should be able to decide
- National Character Areas
- River catchments
- Other [please specify]
- Don't know

[Tick all that apply]

NB – NCAs and river catchments are the most “natural” sub-areas, and we believe that responsible authorities should be able to determine which should be used, taking into account local factors, stakeholder opinions and the need for cross-administrative boundary collaboration and working, for example in terms of setting priorities and data sharing.

Q33 To ensure that the statement of biodiversity priorities provides an accurate and useful description of the Strategy area that can inform the setting of realistic and appropriate priorities, what else should the description consider in addition to describing existing biodiversity?

- **Climate change scenarios**
- **How land use/ habitat distribution has changed over time**
- **Anticipated future pressures on land use (e.g. broad indications of housing and infrastructure need)**
- **Environmental issues in the Strategy area that might be addressed through nature-based solutions**
- **Existing significant nature or environment projects (e.g. landscape scale work)**
- **Other [please specify]**
- **Don't know**

[Tick all that apply]

All of the above, plus:

- i) *Existing plans or strategies setting out priorities for biodiversity, ecosystem services, natural capital plans; access and GI, or identifying landscape-scale project areas. Many exist already and there should be a requirement to build on what's gone before. Many have been prepared in partnership but may not neatly coincide with the LNRS areas. Funding a way to bring existing plans together alongside new data, analysis, partnership working, stakeholder engagement and expert analysis is essential, to encourage support, buy-in and the best outcomes.*
- ii) *Updated regulations and guidance in relation to local Infrastructure Delivery Plans.... It is right that LNRS take into account Option 3 above, “Anticipated future pressures on land use (e.g. broad indications of housing and infrastructure need)”, but any infrastructure proposed should now be required to go through a mitigation hierarchy - where nature-based solutions are explored prior to any hard infrastructure proposals being identified in the Infrastructure Delivery Plan.*

In terms of climate change, adaptation to known impacts and future expected impacts must be included. Use of the Natural England NRN Data Portal and its links to the National Biodiversity Climate Change Vulnerability Assessment tool developed by NE, should be encouraged. It identifies why areas are vulnerable to climate change and which interventions can have an impact on increasing resilience; LNRS preparation should consider why new areas for nature's recovery will be needed in anticipation of upcoming climate change.

Q34 How should the statement of biodiversity priorities describe opportunities

for recovering or enhancing biodiversity without mapping them?

- **Identify particular rarer habitats/species that the strategy area is suitable for supporting**
- **Assess the potential to contribute to national priorities for nature recovery**
- **Describe the relative opportunity for creating more areas of key habitats as well as making them bigger, better and joined up**
- **Indicate broad areas where creating improving habitat may be more achievable**
- **Assess the potential for use of nature-based solutions**
 - However the responsible authority finds most useful
 - Other [please specify]
 - Don't know

[Tick all that apply]

Options 1-5 are all important in the description of biodiversity opportunities.

We agree with the consultation document (pg 27) that there could be potential for the “opportunities for recovering or enhancing biodiversity” (clause 102(2)(b)) to inform the setting of priorities could be confused with the “areas which are, or could become, of particular importance for biodiversity” (clause 103(3)(c)) that should be part of the resulting local habitat map.

Any guidance should be clear on exactly what is meant by each of these terms and how it is expected that the two should differ / inform each other. A model / examples could assist.

However, we believe that opportunities to recover or enhance biodiversity could also be mapped, as well as being described. Mapping is a very accessible format and assists with stakeholder engagement, understanding and so helps with gaining consensus and support. Some opportunities may be applicable across a broad / the whole LNRS area, or apply within certain criteria. Ideally, there should also be a way of showing these spatially too.

The statement of biodiversity priorities may be where previous work, completed by a range of organisations and partnerships to identify biodiversity priorities, natural capital and ecosystem services opportunities and landscape-scale areas of environmental opportunity, should be included as areas of importance for biodiversity (either currently or which could become areas of opportunity).

For example, in the Buckinghamshire and Milton Keynes' area, this could include:

- *Map of Green infrastructure Vision and principles (2018)*
<https://bucksmknep.co.uk/projects/qi-opportunities-mapping/>
- *Natural Capital biodiversity-prioritised ecosystem services opportunity maps – Bucks and MK reports available here:* <https://bucksmknep.co.uk/projects/natural-capital-mapping/>
- [Landscape-scale environmental opportunity areas across the Growth Arc](#) (April 2020)
- *Biodiversity Opportunity Areas in Buckinghamshire and Milton Keynes*
<https://bucksmknep.co.uk/biodiversity-opportunity-areas/>

- [Biodiversity priority areas for offsetting \(Feb 2021\)](#)
- AONB Nature Recovery Zones (in progress)

In this way, the LNRS will be building on previous strategies of relevance – effectively informing the baseline information that would feed into working up the final local habitat mapping.

Q35 Do you think that all Local Nature Recovery Strategies should follow the same priority setting process or that each responsible authority should decide for themselves how priorities should be set?

- All Strategies should follow the same priority setting process
- **Strategies should follow the same high-level principles but with local discretion**
- Strategies should decide for themselves how to prioritise
- Don't know

[Tick one]

Strategies should follow the same high-level principles but with local discretion to ensure the priorities agreed for habitats and species and wider environmental improvement reflect local circumstances and stakeholder ambitions.

The high-level principles could include consideration of national environmental priorities and ensuring neighbouring LNRS collaboration across administrative boundaries.

36. How should national environmental priorities be reflected when setting Local Nature Recovery Strategy priorities?

- National priorities should be advisory
- **Responsible authorities should show how they have considered national priorities**
- Local priorities should follow a consistent nationally-set structure
- Other [please specify]
- Don't know

[Tick one]

Responsible authorities should show how they have considered national priorities for nature's recovery and environmental improvement.

The NEP considers it essential for the plan from the outset how to:

- *assess the contribution of each LNRS to national priorities*
- *understand how national priorities are being taken forward and distributed among LNRSs locally*
- *report on progress and to allow further decisions or actions where there may be a shortfall.*

37. Should Local Nature Recovery Strategies identify only those outcomes for nature recovery and environmental improvement that are of priority or also

include those that are positive but of lower priority?

- List only priorities
- List priorities and other relevant lower priority outcomes
- Don't know

[Tick one]

All the outcomes identified as important for nature's recovery and environmental improvement should be included. This reflects and makes public the full picture of priorities v non-priorities.

Priorities should be actions that should be started sooner, although all actions identified should be planned for and mapped.

The guidance needs to be clear that identifying priorities should be evidence led, with appropriate professional & expert support, and outline how it is expected that LNRSs should be delivering the national targets as provided for in the Environment Bill and elsewhere.

In any review of LNRSs, mapping should be updated to reflect where action has been taken, priorities started/ achieved, etc.

38. How should priorities identified in other environmental spatial plans in the Strategy area be incorporated into the Local Nature Recovery Strategy?

- Considered and prioritised alongside other outcomes
- Incorporated directly
- Don't know

[Tick one]

We believe the answer should be options 1 and 2, allowing for some local discretion where directly relevant, recent and similar strategies to the LNRS requirements have been published.

Despite the existence of many local relevant strategies, some produced in partnership and which could be directly relevant to the LNRS areas and processes (see answer to Q34), if LNRSs are to be produced to a somewhat consistent level nationally, and with consideration of consistent sets of guidance, methodology, inclusions, sub-areas and local mapping outputs, and particularly in conjunction with a broad range of stakeholders, there will, in most circumstances, need to be a re-consideration of existing plans that should take place as a step within the LNRS process.

It would be frustrating to review perhaps recent and thorough work setting local biodiversity priorities, particularly where these strategies are also produced in partnership and widely supported, and with many elements similar to LNRS requirements - as in the case of the NEP's recent Buckinghamshire and Milton Keynes BAP, for example.

The LNRS guidance must recognise the existence of such strategies and provide guidance and suggestions as to how it expects this existing work to be taken into account, allowing for local discretion – for example where a recent, partner-led piece of similar work may need, for

example, minimum further work to comply with the guidance – e.g. around elements of stakeholder engagement and/or new data.

The NEP believes a crucial early step in the LNRS process should be a review of existing plans and strategies, including identifying the stakeholders who produced them, to ensure they are understood, and can be incorporated into the LNRS process via expert and stakeholder input.

39. Do you think that the Local Nature Recovery Strategy should include potential measures for conserving and enhancing biodiversity and making wider environmental improvements that cannot be mapped as well as those that can?

- **Yes both**
- **No, only those that can be mapped**
- **Don't know**

[Tick one]

The NEP considers it essential that LNRSs are not limited to displaying only those potential measures / actions that can be mapped. Where measures are criteria-based, for example, or apply to the whole area, or otherwise not spatially-specific, they are not so easily mapped (although it would be helpful if they could be indicated / listed on any area-wide map if possible, for completeness).

The NEP is also keen to emphasise the need to prioritise the recovery or enhancement of biodiversity first – and then wider benefits, as the consultation itself implies at page 29

“...Locations suitable for carrying out these actions [practical actions that...would help delivery the priorities for conserving or enhancing biodiversity] will...be identified...that could become of particular importance for biodiversity, or where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits.”

40. Should there be a standard list of potential measures for responsible authorities to choose from?

- **No – responsible authorities should have free choice**
- **There should be a list of suggestions**
- **There should be a core list which the responsible authority can add to**
- **Responsible authorities should only be able to choose measures included on a national list**
- **Don't know**

[Tick one]

The NEP considers there should be a core list of suggested potential measures, to assist with consistency across different LNRSs each identifying a similar priority potential measure. But it is also important that the responsible authority can add to this, to allow for local circumstances.

Local Habitat Map

41. What sort of areas, outside of national conservation and local wildlife sites, might a responsible authority reasonably consider to be of particular importance for biodiversity?

- Ancient woodlands
- Flower rich meadows
- Priority habitats in good condition
- Areas used for feeding or resting by animals or birds from a nearby national conservation site
- Any areas the responsible authority chooses
- None
- Other [please specify]
- Don't Know

[Tick all that apply]

All of the above, plus:

- i) *Priority habitats – in full and using local datasets above the national NE one – and not just those in good condition*
- ii) *eNGO nature reserves (w.g. Wildlife Trusts, National Trust., Woodland Trust, etc)*
- iii) *Any area regarded as having a biodiversity value should be included, not simply limited to designated sites or priority habitats. This is because the current habitat mapping in England has gaps, and some important wildlife habitats are not properly captured.*

Part of the LNRS process needs, therefore, to be creating a better understanding of the baseline data.

Ideally, the LNRS process should include an allowance for condition data capture as part of putting together the baseline mapping. This is a key area missing in many local and national datasets, where data is either outdated or missing. Building on complete information will be key for LNRSs to be current, relevant and as accurate as possible.

The NEP also wants to emphasis the importance of timely, accurate and spatially-appropriate information being provided by government for each LNRS area – the consultation document notes this would include, for example, information on the location of “candidate sites” awaiting national conservation site designation, and all national conservation sites in the Strategy area; we also note that the Government’s intentions is for Strategy areas to include Local Wildlife sites.

The guidance should make it clear exactly what information to expect from the SoS and the expectations on the inclusion of information locally. see comment as part of question 8. In the response, we will make it clear that LWS are a specific local definition using robust criteria with a specific protection policy. We’ll add in some text about the NPPF and the

National Planning Guidance which specifically mention LWS when talking about locally designated sites.

Q42 Should all responsible authorities follow a standardised process for mapping potential measures to identify areas that could become of particular importance for biodiversity or other environmental benefits?

[Yes/No/Don't Know]

This section of the consultation seems to be asking about mapping of potential measures in a section about the mapping of areas that could become of particular importance for biodiversity. If the potentially important biodiversity areas and the measures that should be used to create them are both to be mapped, this should be made clear in the guidance.

In terms of mapping the potentially important biodiversity areas:

The NEP agrees with the consultation document that the mapping of areas that could become of particular importance for biodiversity or wider environmental outcomes should be “a transparent process based on strong participation of local partners” (page 31) and that computer-generated models may be helpful to generate initial proposals on which discussion could be based, to aid any decision-making. However, we do not think all areas should be required to follow the same model. Simplicity yet thoroughness may be among the criteria an area should use to help select the most appropriate mapping methodology.

In terms of mapping the potential measures – the NEP believes this should be decided locally to reflect local circumstances, existing or anticipated actions, skills and software, data available, and depending upon how the mapping of the potentially important biodiversity areas is carried out.

The NEP believes it is important for a complete and accurate baseline habitat map to be used to inform the LNRS process. Such a complete habitat map can then be used to understand the baseline of what exists in the area currently, and through a variety of tools to inform the identification of possible areas of biodiversity importance – whether that is an area of new habitat or an area to connect existing or new habitats to boost their biodiversity value – and then the mapping of priority actions or measures to achieve them. For example, the Bucks pilot LNRS made use of a recent piece of work by Natural Capital Solutions in the area, which used a variety of land use data to map the baseline map for the area.

Ideally, the LNRS process should include an allowance for condition data capture as part of putting together the baseline mapping. This is a key area missing in many local and national datasets, where data is either outdated or missing. Building on complete information will be key for LNRSs to be current, relevant and as accurate as possible.

Q43 Do you think that all responsible authorities should seek to identify a similar proportion of their Strategy area as areas that could become of particular importance for biodiversity or wider environmental outcomes?

- **Yes, there should be a set percentage each responsible authority should**

identify

- **No, this should not be set and decided locally**
- **Don't know**

[Tick one]

Neither option quite reflects our view.

We believe this decision should be taken locally, reflecting local differences in baselines of existing protections and land being well-managed for nature. However, it could be informed by an expectation nationally, perhaps with a level of overall ambition to be set in guidance from Natural England. However, it is important that this does not act to limit ambition locally where areas can go beyond it.

However, we also note that in setting an ambition for, and asking about, the proportion of land for particular importance for biodiversity, does not address equally important issues that are vital to nature's recovery - including:

- *The condition of the land in question, and how well managed for nature they are - not just the coverage*
- *Connectivity – a simple coverage figure does not address the (sometimes more important) need for connected networks of biodiversity. The Lawton principles of 'bigger, better, more and joined' must be a priority to run through the regulations, guidance and expectations for LNRs*
- *The need for delivery and ongoing management of these areas to maximise the delivery of the opportunities being identified.*
- *Location of the areas relative to, for example, the demand for various ecosystem services – e.g. to local population centres to provide access to nature.*
- *The fact that all land, whether identified as particular importance for biodiversity or not, could and should be managed better for biodiversity.*

44. Do you think that when Strategies are reviewed and republished, they should map where appropriate action has been taken to make areas of increasing importance for biodiversity? [Yes/No/Don't Know]

The NEP believes that Local Nature Partnerships have a critical role to play in both assisting to produce an LNRs as well as in coordinating collaborative delivery and /or reviewing progress. In order to understand how well an area is delivering on its LNRs, sufficient capacity – people and resources – must be made available to carry out this role effectively.

45. Overall, how satisfied are you with our online consultation tool?

Please give us any comments you have on the tool, including suggestions on how we could improve it.

- Very satisfied
- Satisfied

- Neither satisfied nor dissatisfied
- Dis-satisfied
- Very dissatisfied
- Don't know
- [Free Text Box]

[Tick one]

DRAFT