

CONSULTATION

Response Document



**Local Nature Recovery Strategies: how to
prepare and what to include
(Department of Environment, Food and Rural Affairs)**

2 November 2021

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.

1. Would you like your response to be confidential?

a. If you answered Yes to this question, please give your reason [Free text box]

2. What is your name? [Free text box]

3. What is your email address? [Free text box]

4. What is your organisation? [Free text box]

5. 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]**

6. 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 above is a bare minimum, and most other boxes could be ticked too. The definition of responsible authority still is not clear and will affect how many others are included in the development of Local Nature Recovery Strategies. It will be difficult to consult farmers/landowners at an individual level, but they must be given a process for inputting at the development stage.

As there will be fewer responsible authorities than there are Local Planning Authorities (LPAs), it is self-evident that there must be conversations between LPAs and others.

Bodies such as the Forestry Commission and Environment Agency should be involved where applicable in the Strategy area.

7. Do you think that additional support should be provided to farmers, landowners and managers the land management sector to facilitate their involvement with the preparation of Local Nature Recovery Strategies?

Yes, although it is not clear what is meant by 'support'. Guidance from those with professional expertise will be essential to support the involvement of farmers and landowners. Facilitation of productive conversations will be important to gather clear views from stakeholders and handle difficult conversations. It is also important to ensure that support is acted upon and follow up is provided.

8. 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?

Don't know

There are established procedures for sharing information, for example, many District Councils already buy into a higher level scheme. The introduction of an obligation to share data must recognise that there are costs and time demands involved and these must be covered. Data sharing is a complicated situation in many areas and it will likely need local resolution.

9. 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?

Don't Know

If yes, what information should be included? [Free text box]

There are existing issues with data access that will require local agreements and many organisations that hold useful data for preparing the strategies, such as local special interest groups (e.g. bat, bird groups etc.) and wider organisations. Local agreements may not include an obligation but it is essential that data sharing is supported and encouraged.

10. 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]**

There must be meaningful cooperation and communication between Responsible Authorities (RAs) as landscape features and habitats do not follow county boundaries where the LNRS will be considered in planning decision making. We would select more than one option above, including "Required to give information to neighbouring responsible authorities that would help them prepare their Strategy".

The existing duty to cooperate under the Localism Act (2011) provides a good model for addressing strategic, landscape-scale matters.

11. Should draft Local Nature Recovery Strategies be subject to a local public consultation prior to publication?

Yes

It is important that the preparation of the LNRS is a democratic process and provides an opportunity to share views. RAs must be prepared to act on the views presented if consulting. This is important to legitimise the process.

12. 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?

No

This could result in the loss of biodiverse or potential 'stepping stone' and corridor sites and would not account for changing priorities with future changes in land ownership.

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

This is a public document so others should be able to suggest additional areas. However, there may be a need to manage expectations.

14. 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]**

There must be some consistency around engagement to help with quality assurance but parties must be encouraged to make discussions meaningful.

15. 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

16. 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]**

Local Authorities that have a legitimate interest e.g. are impacted downstream. The Environment Agency may also raise disputes.

17. 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]**

18. 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]**

19. 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]**

20. 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]**

If a County Council is responsible for the draft, each District Council would need to have an elected member to sign off. Local Authorities (LAs) already have established partnerships and so this should be easily implemented but the process should be managed carefully so the plans aren't held up for a long period of time e.g. allowing a period for disputes.

National Parks and AONB boards will also need input into the sign off process.

21. 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]**

Removal of land allocated for planning has the potential to cause legal issues and LAs likely would not sign off on an LNRS if it is in conflict with their local plan.

22. 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]**

23. 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]

24. 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

Consistent data formats will be needed to help inform the Nature Recovery Network (NRN) but this will depend on resource availability. Data standards are already being used which can provide a template.

25. 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]

26. 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]

27. 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

This would be a very useful resource for those referring to them and will also help maintain consistency.

28. 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**
- Don't know [Tick one]

Ad-hoc changes would make it hard to keep up over time. The existing duty to review local plans provides an example for how LNRS can be updated. LNRS should be reviewed at least every 5-10 years and LNRS with overlapping features should be published and reviewed at a similar time to maintain a consistent approach.

29. 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]

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]

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

Yes

32. 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]

There must be consistency across contiguous habitats, ideally this would come from consistent engagement by adjacent LNRS with, for example, the water catchment body.

33. 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]**

In order to provide Nature-based Solutions and effectively address the Environmental Improvement Plan objectives, it is important to understand how habitats came to be in their current extent and condition, and what existing pressures are. A whole catchment approach is needed for rivers, and a similar landscape approach is needed for other habitats. Different scales must be integrated.

34. 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]**

The LNRS will require a series of maps leading up to the final LNRS summary map. These will include landscape features, habitats, species distributions etc.

Those highlighted above are all obvious items that need to be covered in addition to the maps, however there is a need for common language for comparative studies.

With increasing recreational pressures on the natural environment areas will be needed that work for nature, as well as areas that work for people to enjoy nature, and they may not

necessarily be the same places to avoid impacts on biodiversity. Assessments of how appropriate areas are for public access may also be included.

35. 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]

The government wants consistency of delivery so RAs should follow the same process in setting priorities. An example is seen in the designation of SSSIs which follow a consistent process. Reporting will need to be consistent at a regional and national scale.

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]

RAs will need to reach a local conclusion within the framework of national policy. If the Environment Bill targets, EIP indicators and outcomes, 30x30 goals etc. are to be achieved then such national targets must be more than advisory.

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]

Being a priority implies they have been screened and decided they are urgent. RAs must be aware of changes as LNRS will exist in a dynamic situation, and so, listing lower priorities opens flexibility in a change of circumstances.

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]

It will be essential to see how LNRS fit with NRN strategy priorities. It would be helpful to clarify what other environmental spatial plans would be incorporated- e.g. pollinator plans, trees and woodland plans etc.

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]**

While it might not always be necessary to map measures, it is essential that they can be monitored. LNRS will also need to show how they affect people and what they mean at the local level (i.e. they will still have a spatial aspect).

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]**

Consistency is needed but the highlighted option would allow flexibility for additional local priorities.

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]**

Priority habitats should guide in selection of wildlife sites and should not only include those in good condition, but also those in need of restoration with potential to be in good condition. LNRS will play a key role in encouraging biodiversity repair, in addition to protecting nature-rich sites.

Most flower rich meadows and ancient woodlands will have already been designated as Local Wildlife Sites or SSSIs but others should also be included.

Areas used for feeding or resting by animals or birds from a nearby national conservation site already exist for planning purposes. These should also include important buffer habitats.

Local Nature Reserves (LNRs) should be one of the cornerstones of Local Nature Recovery Strategies. LNRs are a statutory designation made by principal councils in the UK on land they own or control and are included under Local Wildlife Sites. Parish and Town Councils can declare LNRs but the relevant powers must be delegated to them by a principal council. There are 1,666 LNRs in England covering a total area 86,365.3 ha (February 2021). LNRs are best seen as nodes in multi-functional green networks, placing them in a landscape context, valuing them as part of the local environmental resources, and drawing attention to their excellence as sites of nature conservation value. John Lawton's influential report '*Making Space for Nature*' brilliantly summarises what needs to be done in four words: More, Bigger, Better, Joined. The argument is eloquently made that coherent and resilient ecological networks are needed where habitats are joined up by green and blue corridors extending across landscapes to allow nature to thrive. The current Natural England standards for accessible natural greenspace include LNRs at a minimum level of one ha for every thousand population. The provision of LNRs is expected to be included in the new Natural England Framework for Green Infrastructure Standards due to be published in 2022. The provision of LNRs in relation to the size of the resident population is a simple and effective measure to promote the designation of high quality sites that are managed for their natural features, habitats and species, for environmental education and for the enjoyment of nature by the public and local residents.

42. 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]

Yes

43. 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]

National targets will influence the proportion of areas that are protected for nature and LNRS should be contributing to these. However, exact proportions will vary depending on local perspectives of importance and current circumstances so it shouldn't be limited based on a set percentage. Again, LNRS must consider a landscape-scale approach and enable those working at a larger scale or on adjacent LNRS, for example looking for net gain sites, to be able to 'read across' LNRS.

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]

Yes

LNRS must be reviewed and revised, not just republished. The addition of a map showing where appropriate action has been taken can help set priorities for the next iteration.

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