

Local Nature Recovery Strategies: how to prepare and what to include

Consultation response

October 2021

[Wildlife and Countryside Link](#) (Link) is the largest environment and wildlife coalition in England, bringing together 62 organisations to use their strong joint voice for the protection of nature.

Introduction

We welcome the chance to respond to the consultation from the Department of the Environment, Food and Rural Affairs.

With the *25 Year Environment Plan*¹, the Environment Bill² and its 30x30 ambition³, the Government has set out its ambition with a number of major commitments. These include the intended aim to halt the decline of species abundance by the end of 2030. Local Nature Recovery Strategies (LNRSs) are a key policy to help achieve many of these commitments. Being co-created and co-owned by local stakeholders, outcomes identified by the area-based LNRSs are more likely to be delivered and, so, support the Government's commitments to nature. This is an opportunity that we must get right and that must be universally implemented.

To be successful, LNRSs need the content, resources and standing to deliver more, higher quality, and better-connected nature as part of wider landscape-scale nature recovery. They should be developed with an evidence-based approach to including/excluding sites, with input from as wide a range of stakeholders as possible. National targets and priorities must be central to LNRSs, which should function as their spatial expression. They need to be embedded in other land-use plans, which, with sufficient resourcing, will allow the outcomes to be delivered on the ground. LNRSs can also help inform delivery mechanisms for nature-based solutions to the climate emergency.

We (Wildlife and Countryside Link) have responded to the online consultation but there are a number of other areas and concerns that need to be considered when drawing up guidelines and regulations, which we will address here. Our members will also be submitting their own responses.

In particular, our members have thoughts and concerns that can be grouped into three broad areas:

- The **Process** required to set up LNRSs
- **Connectivity** both of geographic areas and across different policies
- **Delivery** of outcomes on the ground once strategies are in place

Although the last, delivery, is beyond scope of this consultation, we note that sufficient resources and strategic direction will be required to deliver the outcomes identified by the LNRSs.

It is also critical that biodiversity and nature recovery are integrated into key decisions, including in planning, through statutory mechanisms. The link established between LNRSs and the planning system by the Environment Bill should be strengthened further in the forthcoming Planning Bill. LNRSs should be regarded as material planning considerations to inform decisions about land-use that may

¹ <https://www.gov.uk/government/publications/25-year-environment-plan>

² <https://bills.parliament.uk/bills/2593>

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

impact on the condition and enhancement of nature in an area. They should inform Local Plans, with Local Planning Authorities required to justify if and why the Local Plan ignores priorities identified in the relevant LNRS.

Process

There are three components of the LNRS development process that are covered by the consultation and three further parts that should be considered.

1. Data (Questions 8, 9)

For the process of establishing LNRSs to work, each responsible authority (RA) should, in principle, have access to all relevant data. This means that if a local authority (LA) within the LNRS has data that would help inform the LNRS, then, ideally, it should be shared but in a way that doesn't compromise any commercial value for the LA. We are concerned that there might be an obligation to provide data because that is less likely to encourage the LA who owns the data to be involved, and invested, in the LNRS process. A collaborative, and more discretionary, process might involve discussions between the RA and LA. In most cases, it should be possible to come to an agreement, perhaps along the lines of the Cumbria LNRS pilot where data was used to inform the LNRS but boundaries were not published.

To address the concerns about commercial value, the Cumbria approach could be standardised and recommended as one approach that can be used by other RAs.

More generally, in particular for the 61% of Local Planning Authorities (LPAs) that don't have in-house ecological expertise⁴, it will be important to consolidate the multiple data sets that are nationally available to ensure that there is no redundancy, and to ensure they have access to the most complete data sets. This will be vital to identify and deliver informed, evidence-based, nature and landscape enhancement as part of the LNRS. Each RA will need to access ecological expertise, either in house or in partnership with eNGOs, and both approaches will require sufficient resources to be available to ensure that the LNRS process works correctly.

Species data

We recommend that guidance includes a more standardised approach to incorporating species data alongside habitat data, facilitated by additional information provided under Section 108 (information to be provided by the Secretary of State).

Local Nature Recovery Strategies are a habitat-based approach, which should, in principle, allow for the conservation needs of most species. There will be exceptions, especially if certain habitats are not included. For example, missing out arctic alpine habitats would mean that associated species, often at the very edge of ecological niches, could miss the opportunities to benefit. To ensure that, for example, species of springs and seepages, species requiring specific habitat mosaics rather than habitat types and brownfield specialists are not overlooked in favour of habitat or community generalists, some species-focused data is required.

Furthermore, for climate change resilience, there must be suitable connectivity between habitats for those species that have very specific requirements. Examples include hedgerow connectivity,

⁴ <https://cieem.net/wp-content/uploads/2021/09/LPA-Survey-Full-Report-Aug-23-2021-FINAL.pdf>

and high quality grasslands and open habitats, both of which are important for species movement. Ensuring that measures take into account the functional range of species with specific needs in the landscape is important as without this consideration, functional fragmentation and isolation of species populations can occur.

Furthermore, incorporation of species data can be beneficial when GIS layers are created for mapping. The Greater Manchester Pilot used a mixture of habitat and species data throughout the process, both to identify existing habitats and to inform their modelling work. Trial and error made it clear that both were needed to provide the most detailed view⁵. This is an approach that could be replicated by other LNRs.

We also support using mapping to identify sites of greatest potential to deliver a range of benefits as well as biodiversity using conservation and restoration as nature based solutions. These include finding opportunities to tackle flood risk, improving water quality, increasing access to high quality/wildlife-rich blue and green spaces (for example, wildflower grasslands in parks) in deprived communities and improving air quality.

We have two proposals to help RAs access both relevant species data sets and taxon-specific experts:

- Relevant data should include all national recording schemes in addition to that held by Local Environmental Record Centres and the National Biodiversity Network. This could be collated at national level, coordinated by Natural England, and then disseminated as regional datasets to avoid 50 separate approaches to each scheme. Local data is important but for many invertebrates the best quality data is held nationally and if the recording schemes are not considered, there is a risk of rarest species being poorly represented and their needs being overlooked by LNRs.
- There are too few taxon-specific experts to deal with queries from all 50 LNRs in the manner that they did with the Cumbria pilot. We propose that an **Expert Hub** is put in place. This would be a tiered process whereby an intermediate group of people, most likely a partnership between eNGOs, with the appropriate resourcing, and Natural England, which can filter queries to pass on to taxon experts. This would provide a single point of access to stretched national experts for RAs to go to.

We suggest that for the data mapping component of an ideal LNR:

- It is important that LNRs are able to consider and incorporate existing spatial work as part of the expert contribution so as not to replicate work that already exists. This should incorporate a number of data sets, including as a minimum, SSSIs and other protected wildlife sites (the National Habitat Map), UK Biodiversity Action Plan Priority Habitats⁶, European Protected Species data sets⁷, Buglife's B-Lines⁸, the Wetland Vision⁹, Ancient

⁵ They used vice county recorders to identify the best indicator species for each habitat type within Greater Manchester. They then used habitat parcels in combination with recent indicator species to create the LNR layers and input layers for modelling applications.

⁶ <https://hub.jncc.gov.uk/assets/2728792c-c8c6-4b8c-9ccd-a908cb0f1432>

⁷ <https://data.gov.uk/dataset/6b517c86-5bc6-425a-b696-5a18c7d6e818/granted-european-protected-species-applications>

⁸ <https://www.buglife.org.uk/our-work/b-lines/>

⁹ https://ww2.rspb.org.uk/Images/wetlandvision_tcm9-132957.pdf

Woodlands¹⁰, the Ancient Tree Inventory¹¹, Tree Protection Order data, Important Areas (Birds¹², Plants¹³, Fungi¹⁴, Invertebrates¹⁵, Freshwater¹⁶) and Local Conservation Sites (**Question 41**).

- Mapping and modelling of how to deliver the Lawton principles (Nature Recovery Network).
- Individual LNRSs must also be able to bring together and consolidate local plans including local spatial plans, flood risk management plans and river basin management plans.
- There should be consideration of species groups, including vascular plants, mosses, lichens, fungi, bryophytes, molluscs, butterflies and moths, beetles, dragonflies, flies, bees and wasps, bugs, spiders and arachnids, aquatic invertebrates, marine life (where relevant), mammals, birds, reptiles and amphibians, fish.
- Many of the rarest, especially invertebrate, species have very few records and, often, coarse data so may be difficult to map. It is important that these unmappable measures be included (**Question 39**). Lack of data should not be taken as lack of potential.

For LNRSs to be successful ongoing data collection, analysis and collation must feed into the strategies and this will need funding. Although we recognise the need for flexibility in the development of LNRSs, effort needs to be made to ensure that different habitats and species groups are treated fairly throughout the process, and the only way to do that is to identify gaps and invest in data collection.

We recommend that that there is sufficient capacity resourcing of RAs¹⁷ to enable an annual local assessment of each LNRS, for example as a report or a gathering of stakeholders. This would allow progress to be monitored and issues to be flagged in a transparent way, which would also aid the subsequent 5-year review of the LNRS.

2. Collaboration (**Questions 5, 6**) and Stakeholder engagement (**Question 7, 12**)

These are two subtly different, but related, aspects of collaboration that are core to the process.

Whilst there needs to be a wide collaboration of groups involved in the governance and running the LNRS development process, the right stakeholders need to be brought in at the right time. Not all the stakeholder groups in **Question 5** need, or want, to be involved early on in the governance. It is more appropriate that individual businesses, landowners and members of the public are actively involved in the stakeholder engagement stage. Stakeholder engagement could be sought at any time throughout the process, as and when the local RA/LNRS Strategy group (the equivalent to the Pilot Area Team in the pilots) think is the appropriate time. It may well be helpful, for example, to engage with individual landowners early on so encourage their buy-in, which is crucial to delivering the LNRS outcomes. It is also important that, overall, it is a science-

¹⁰ <https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodland-england>

¹¹ <https://ati.woodlandtrust.org.uk/>

¹² <https://hub.jncc.gov.uk/assets/377c0fc8-d8f2-49bc-ae7a-f37deb290b76>

¹³ <https://www.plantlife.org.uk/uk/nature-reserves-important-plant-areas/important-plant-areas>

¹⁴ <https://www.plantlife.org.uk/uk/our-work/publications/important-fungus-areas>

¹⁵ <https://www.buglife.org.uk/our-work/important-invertebrate-areas/>

¹⁶ <https://freshwaterhabitats.org.uk/research/important-freshwater-areas/>

¹⁷ https://www.wcl.org.uk/docs/assets/uploads/LNRS_resource_requirement_estimate_summary.pdf

based approach and that the best information is properly weighted and considered in the right context.

For LNRSs to be a success, they must be used and we recommend that one aim of the stakeholder engagement is to determine what the different stakeholder groups need from the LNRS and how they might use the priority statements and maps. These would then, in particular, inform the format of the final habitat maps.

One important group that is missing is the healthcare sector. There is robust evidence that nature provides important benefits to physical health and mental wellbeing^{18,19} and involving the healthcare sector is an opportunity to embed nature, and equitable access to nature, in the sector.

Access to nature is something that should be considered more generally by LNRSs. For example, LNRSs could also provide opportunities for the local community to get involved in delivering habitat creation and enhancement, such as projects for clearing scrub from degraded grasslands, pond creation or community orchards. This local involvement would encourage a feeling of connection to the LNRSs and also lead to mental health benefits from spending time in green space. The consultation document notes that the pandemic has underlined the importance to health and wellbeing of access to nature and green spaces. However, this does not seem to be picked up by any of the consultation questions. To gain the benefits from access to nature, there must be mechanisms to provide public access to nature-rich paths and green and blue spaces.

One approach would be to include a requirement for RAs to consider meeting the Access to Natural Greenspace Standards and forthcoming Green Infrastructure Standards as part of the guidance or regulation.

Broad and comprehensive stakeholder engagement will be essential to the creation, adoption and delivery of a successful LNRS. One of the most crucial groups will be the landowner/manager/farming sector (**Question 7**). The transition to the Environmental Land Management (ELM) schemes will already be taking up their time and effective, accurate, resourced LNRSs should be a part of that transition. Additional support in the form of convenors, as in the pilots, should help ensure sufficient numbers are involved in the LNRS process and help farmers/land managers understand and adapt to the opportunities LNRSs offer.

LNRSs should be a science-driven consensus, based on the best options for nature's recovery. Areas should not be ruled out for consideration solely on the basis of landowners' interests. (**Question 12**). LNRSs are the strategy that will guide delivery of outcomes for nature. This two-step process means that those areas, identified by science-based consensus that need to be included in LNRS habitat maps are included. However, if a landowner has a strong inclination to use that land for other purposes, then any associated prioritised outcomes are unlikely to be delivered. A well run, locally co-produced LNRS process would listen to the local stakeholders and may not prioritise those outcomes in that instance.

If LNRSs are to deliver real and lasting improvements to nature and landscapes, for the benefit of current and future generations, it is vital that a holistic approach to local nature recovery is taken around the country. However, it is important that LNRSs do not result in the undervaluation of contributions which can be made on habitats not identified as priorities or within priority areas.

¹⁸ White *et al.* 2019

¹⁹ Richardson *et al.* 2021

We need to make sure that all landowners continue to be encouraged to contribute to nature's recovery, wherever they are located, and are not put off by a sole focus on LNRSs.

Furthermore, the experience of some of our members highlighted the difficulties of small national eNGOs in getting involved with some of the LNRS pilots. A good stakeholder-led process must include experts as a stakeholder group and their scientific data, and knowledge, are indispensable to the process.

This means that it is essential that all eNGOs are allowed the opportunity to engage with every LNRS process at the appropriate stage. The appropriate stage may vary for different eNGOs.

It will then be up to them to decide whether they have the capacity to be involved. RAs will have different timelines when it comes to stakeholder engagement, which should facilitate engagement with more LNRSs. Whilst RAs should be aware of the local eNGOs active in their area, not all taxon groups will be represented by active local groups and where they are present there will be huge variation in availability to engage. LNRSs guidelines could list national eNGOs, which are a vital repository of an important source of knowledge and data. This could be facilitated by Natural England, who will be involved in each LNRS, and could have access to a list of relevant national eNGOs. Indeed, this principal should be extended to all stakeholder groups and we recommend that RAs conduct a comprehensive stakeholder mapping step in the LNRS process.

Stakeholder and broader community engagement will be essential for public backing for schemes, which in turn is essential to LNRS areas being valued and their recovery promoted. Local engagement could also facilitate delivery by increasing the number of people willing to volunteer to help LNRSs sites recover. In particular, LNRS sites in urban areas will need public support or they will not be valued by the community and may be degraded or neglected. Strong public engagement is likely to identify areas important to the public and therefore with wellbeing, as well as nature, including places in or close to urban areas. This is important for maximising the benefits of the LNRSs. A comprehensive engagement strategy, for example open meetings for small areas within each strategy area, would facilitate public backing for nature recovery. One consultation for the whole area, especially if online, will not adequately capture local views. This requirement should be included in the regulations, or some responsible authorities may only create a top-down strategy.

It will be important that there is sufficient resourcing available to ensure stakeholder participation. This includes funding for stakeholder engagement and funding advisors to engage with landowners and farmers. There is also a need for some resources for those eNGOs whose participation in the process is crucial, in particular those that will be supplying knowledge, data and expertise.

3. Flexibility (**Questions 24-27, 31, 32, 35, 36, 40**)

One key aspect of LNRSs, which should make them a more effective instrument than previous initiatives, is local co-production and co-ownership. This means that individual LNRSs will have differing local requirements and it is important that there is flexibility within the guidelines to accommodate them. This includes a need to be able to integrate existing work in those LNRSs where it is available. Nature, habitats and landscapes will vary around the country. For example, there are 159 of Natural England's National Character Areas, all with differing needs and

opportunities that make them unique, whilst other geographies, such as river catchments, may be more appropriate in some areas.

More specifically, when it comes to the publication of the LNRs, the local habitat maps (**Questions 24, 25**) are likely to be similar in format with GIS layers, consisting of the different themes identified by the LNRs but the themes are likely to vary between LNRs. This was the case with the pilots and it is important that RAs can use the geography, of which National Character Areas are only one option, that has the most utility for conservation needs within the local area (**Questions 31, 32**).

Similarly, there was variation in the format of the biodiversity statements amongst the pilots and this should be allowed to continue (**Question 26**), as long as the details of the outcomes and measures are accessible in some way. To facilitate transparency and public access to the maps and statements, they should all be made available on a central website, perhaps hosted by Natural England (**Question 27**). Some consistency in how the maps are presented, especially in terminology, would facilitate national collation and cross-border working, although what that consistency is will depend on how they are going to be used. The maps and statements could also be hosted on local RA sites. Having a central source of the LNRs statements and map, will help identify strategic national opportunities (for example, which habitats and species are in particular need of intervention).

When it comes to the priority setting process, it is important that there are some high-level principles that all LNRs apply to ensure continuity across LNRs and integration with national policies to meet national targets and requirements. However, there should be significant local discretion to meet local requirements and it should be clear that they have considered the national priorities (**Questions 35, 36**).

We would like to flag that Question 35 requires some clarification because it was interpreted in different ways by our members. Do 'high-level principles' refer to the key principles mentioned in the text (openness, transparency and consistent use of accessible language) or principles concerned with the actual process of priority setting?

It is important to balance biodiversity and wider environmental goals within LNRs. There is a risk that habitats offering headline-grabbing benefits could be favoured over a diversity of habitats which contribute to other services, or play an indirect or supporting function, but on aggregate support greater biodiversity.

To make it easier for LNRs to identify 'potential measures' it would certainly be helpful to have a list of suggestions. The hybrid approach whereby it is then possible for RAs to add to would allow sharing of ideas across LNRs (**Question 40**).

The process that was trialled by the pilots was linear with little opportunity for iterative feedback. Whilst a linear process is appealing because it should be more predictable and easier to implement, there needs to be flexibility that can allow iterative feedback. For example, around the stakeholder engagement and outcome generating steps. This would be especially important for any LNRs that want to use a Systematic Conservation Planning approach, for which iteration and stakeholder engagement is core to the process.

The exact balance between prescription and local flexibility is one where there was most variation in the views of our members. Submissions from individual organisations will differ, particularly in accompanying commentary on **Questions 24, 31 and 35**.

4. *Time*

To be successful, LNRSs will need to have sufficient time for comprehensive stakeholder engagement. All the pilots struggled with the timeline they were given and stakeholder engagement will need considerably more than the month or so that some pilots allocated to the process. Face-to-face meetings and events will be one of the main methods of engagement and these will take time to organise and undertake. These will help ensure that local communities are engaged in their LNRS and vested in the successful delivery of enhancement projects in their LNRS area.

There will also be a need to approach stakeholder groups at different times to get the best results, which will extend the whole process. So, for example, many farmers will be very busy over spring and autumn with lambing and harvest, whilst holiday periods may reduce opportunities to engage other groups. Some RAs, such as those involved in the pilots, may be able to work to a 12-18 month timeline because they have already done a considerable amount of work. However, there will be a number of RAs that will require more time in advance of the stakeholder engagement and will have to develop the stakeholder relationships. They will require more than 18 months to complete the process.

Furthermore, to allow for some level of collaboration between LNRSs to ensure connectivity between them (see below) sufficient extra time will be required. Some potential RAs are already thinking about how to work with neighbouring RAs to ensure this connectivity but many are waiting until the guidelines are out and for the process to start. This means that they will need to devote time and effort to these relationships. As resources and capacity are likely to be tight, working across a number of LNRS boundaries will require significant time.

5. *Commercial forestry*

One concern that is not addressed by the consultation is that monoculture stands of commercial forestry (either native or non-native) should not be considered as an outcome or measure for nature recovery in an LNRS. While restoration of PAWS (Plantation on Ancient Woodland Sites) is an important nature recovery tool, new plantations are not. New non-native conifer plantations are, by definition, poor in terms of native tree cover and number of native tree species, and are often also poor in terms of age distribution²⁰. It is promising that the final outputs from the pilots did not include any such measures but without guidance it is foreseeable that some LNRSs may not come to the same conclusion. It is also important that tree planting targets and priorities are not included at the expense of open habitats already making a contribution to nature conservation.

6. *Resourcing and capacity*

Sufficient resourcing and capacity will be essential to allow RAs and LAs to set up and run the LNRSs and this was specifically highlighted by the 'Lessons learned'²¹. We have estimated the

²⁰ <https://www.woodlandtrust.org.uk/state-of-uk-woods-and-trees/>

²¹ <https://www.gov.uk/government/publications/local-nature-recovery-strategy-pilots-lessons-learned/local-nature-recovery-strategy-pilots-lessons-learned>

resources required²² and hope that the Government lives up to the commitment to funding the new burdens they gave in their recent response to the Environmental Audit Committee²³.

Connectivity

To ensure that the individual LNRSs join up to create the national Nature Recovery Network²⁴, it is essential that there is connectivity both across and between LNRSs. This includes connectivity across local planning authorities within, as well as adjoining, the LNRS area to ensure that priority outcomes are reflected in local land use plans (specifically local plan site allocations). To achieve connectivity across LNRSs, there will need to be a balance of local determination, driven by stakeholder engagement, with national requirements. Both will need a strong underlying ecological science base but it will be the local and immediate realities, in particular engagement of landowners, that will determine what proportion of the LNRS could be areas that become of particular importance for biodiversity or wider environmental outcomes (**Question 43**).

Achieving this connectivity between LNRSs is something that must be a requirement of the process.

This connectivity will need a number of different approaches. It should be left to local discretion as to how to achieve this inter-LNRS connectivity (**Question 10**). Some approaches include:

- Institutions that cross LNRS areas, such as some AONBs (@16), National Park Authorities (@6), established Local Nature Partnerships (@9) and local Wildlife Trusts (@6) will play a crucial role. This means that they should all be directly involved in the governance structures of each individual LNRS.
- Incorporation of existing analysed spatial data sets, both national (for example B-Lines) and local (for example Biodiversity Opportunity Areas in the South East) will play an important part in ensuring that there is connectivity between LNRSs.
- Responsible Authorities can be encouraged to explore how neighbouring LNRSs can link up and work together through memoranda of understanding.
- Integrating LNRSs with national policies, including the Nature Recovery Network, the Local Nature Recovery and Landscape Recovery components of ELM and the forthcoming Planning Bill would promote connectivity, and delivery of that connectivity across the wider landscape. In particular, spatial elements of ELM should be aligned and integrated with LNRSs.
- It is important that connectivity through catchments from source to sea is also considered and as such it will be key that LNRSs engage with Catchment Partnerships/Rivers Trusts and take account of relevant plans such as River Basin Management Plans, which will often cross LNRS borders.

In most, if not all, cases this should be sufficient to ensure connectivity between LNRSs, but if this doesn't happen, there should be a clear dispute process that will, ultimately, allow the Secretary of State to have some capacity to compel RAs to cooperate (**Questions 15-18, 22, 23**).

In conclusion, a flexible, locally co-produced LNRS process with broad ownership that has a requirement for connectivity, using the best possible and most appropriate data sets has a chance to

²² https://www.wcl.org.uk/docs/assets/uploads/LNRS_resource_requirement_estimate_summary.pdf

²³ <https://committees.parliament.uk/publications/7463/documents/78144/default/>

²⁴ <https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network>

succeed where other initiatives have failed. However, for them to be successful and, ultimately, their outcomes delivered, LNRs will need to be sufficiently resourced. This includes the initial set up, ongoing running costs, delivery of the opportunities and filling data gaps. Sufficient time will also be needed for developing LNRs to ensure that they are comprehensive and no corners are cut. In some cases, RAs may need as long as 24 months but milestones could be used to ensure that efforts are not left to the last possible moment. They also need an appropriately strengthened duty so that they can materially inform land-use planning decisions. This is an opportunity to put in place a strategy that could reverse the decline of nature and we must get it right.

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