

# Local nature recovery strategies: the preparation process and contents

Government response and summary of responses

Date: 23 March 2023

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PB no14793

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### Government response to the consultation

#### Introduction

This is the UK government's response to the consultation <u>Local nature recovery strategies:</u> <u>how to prepare and what to include</u>. This document includes the summary of responses to the consultation and sets out how the government will reflect the views expressed in the roll out of this policy.

Local nature recovery strategies are a nationwide system of spatial strategies to help reverse the decline of biodiversity. In doing so, they will help deliver wider environmental benefits and play a vital role in helping to meet national environmental objectives and targets. There will be approximately 50 strategy areas covering the whole of England with no gaps or overlaps. Preparation of each strategy will be locally led by a 'responsible authority' who must:

- map the most valuable existing areas for nature
- agree priorities for nature's recovery
- map specific proposals for creating or improving habitat for nature and wider environmental goals

Local nature recovery strategies will drive more coordinated, practical and focussed action to help nature. The responsible authority will be required to work collaboratively with other local organisations with input encouraged from across the public, private and voluntary sectors to establish shared proposals for what action should be taken and where.

Delivery of the proposals set out in a local nature recovery strategy will not be directly required but will instead be encouraged by a combination of financial incentives, the support of local delivery partners and broad requirements on public bodies. This includes:

- encouragement to create habitat to meet biodiversity net gain in locations proposed by local nature recovery strategies (via a 15% uplift in how net gain is calculated)
- a requirement on all public authorities to 'have regard' to relevant local nature recovery strategies in complying with their duty to conserve and enhance biodiversity
- national planning policy which states that plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, to ensure sites are appropriately protected from inappropriate development and opportunities for enhancement are considered
- funding for particular habitat creation activities, such as planting trees or wetland creation, and investments to support species abundance objectives

Every local nature recovery strategy will be reviewed and republished from time to time to assess what progress has been made and to update proposals for further action. Where action is taken, and wildlife-rich habitat is created or restored, this will make an important contribution to the Nature Recovery Network.

### **Timelines and updates**

<u>Sections 104 to 108 of the Environment Act 2021</u> legislate for local nature recovery strategies. The Environment Act gained Royal Assent on 9 November 2021 and the local nature recovery strategy sections came into force on the 24 January 2022.

The consultation <u>Local nature recovery strategies: how to prepare and what to include</u> closed on 2 November 2021.

The <u>regulations</u> and <u>statutory guidance</u> that the consultation was designed to inform have been laid before Parliament on 23 March 2023. The regulations establish how a local nature recovery strategy should be prepared, published, reviewed and republished, whilst the statutory guidance explains what a local nature recovery strategy should contain.

#### Structure of consultation

The consultation set out the government's intentions for local nature recovery strategies and then asked 40 questions to inform preparation of regulations and statutory guidance. The questions were organised into 6 parts:

- 1. Achieving collaboration.
- 2. Achieving consistency and resolving disagreements.
- 3. Publication of local nature recovery strategies.
- 4. Review and republication of local nature recovery strategies.
- 5. Statement of biodiversity priorities.
- 6. Local habitat map.

The government's response to the consultation follows this same structure.

### Part 1: Achieving collaboration

The government is committed to preparation of local nature recovery strategies being open and collaborative. Consultees were of the view that a wide range of stakeholders are essential to strategy preparation.

#### These included:

- Defra arms-length bodies
- environmental partnerships
- planning authorities in the area
- landowners and land managers
- environmental non-governmental organisations
- local records centres and local recording groups
- infrastructure stakeholders
- the business sector
- town and parish councils
- members of the public

The government considers creating a national list of statutory consultees that all responsible authorities must involve in strategy preparation to be an ineffective option in facilitating broad, local engagement. It would risk creating a 'tick-box exercise' where limited thought is given to how and when different groups could be best involved. Any exclusions could disadvantage the very local groups the policy seeks to include.

Instead, the government is encouraging each responsible authority to develop a locally-tailored approach to engagement to create collective ownership of each strategy and enable a wide range of stakeholders to have their views heard.

#### Stakeholder engagement

In line with responses to the national consultation, the government is also requiring all local nature recovery strategies to be subject to local public consultation prior to publication.

The regulations also include a requirement for responsible authorities to publish up-to-date online information on the progress of their strategy.

#### Creation of the supporting authority role

The government is also introducing requirements for how responsible authorities must work with specific bodies. Local authorities, national park authorities and Natural England, as planning authorities and the government's nature advisor, all have key roles to play in supporting the preparation and delivery of local nature recovery strategies.

Therefore, the government is using regulations to establish the role of 'supporting authority' to give these bodies a formal say in preparing the local nature recovery strategy for their area. This role will also help ensure that the responsible authority works collaboratively. More information on the role of supporting authorities is provided in Part 2.

### Working with neighbouring strategies

The government is also promoting collaboration between neighbouring local nature recovery strategies by requiring responsible authorities to share information with neighbouring responsible authorities at key points during strategy preparation.

This information includes their consultation and publication drafts of their local nature recovery strategy. Natural England will also play a key role in joining-up strategies. As a supporting authority in every strategy area, they will be well placed to provide insight on specific opportunities for collaboration between neighbouring strategy areas.

### Working with farmers, landowners and land managers

To support collaborative strategy preparation, the government also sought views on engagement with farmers, landowners and land managers. Consultation responses showed a clear preference for additional support to facilitate the involvement of farmers, landowners and land managers in local nature recovery strategy preparation. The local nature recovery strategy pilots found that facilitators were important in helping engage farmers and land managers in the preparation process.

This year, government will continue to improve our agri-environment schemes, including the Sustainable Farming Incentive and Countryside Stewardship, alongside the Countryside Stewardship Facilitation Fund schemes, including the Facilitation Fund offer to support those who collaborate across larger areas. In parallel, government will review how best to engage landowners and managers in local nature recovery strategy preparation and support responsible authorities in doing so.

Consultation responses strongly rejected the suggestion that landowner or manager agreement was essential for an area to be mapped within the local nature recovery strategies. Associated comments reflected the fact that mapping a proposal to create or improve habitat does not place any obligation on the landowner or manager to carry it out and highlighted the importance of the spatial connectivity between proposals not being undermined. Therefore, government is not requiring this in regulations.

However, the government continues to believe that the support of landowners and land managers is vital to the successful delivery of local nature recovery strategies and is therefore using statutory guidance to promote a balanced approach to requests for land inclusion or exclusion.

This guidance emphasises the importance of accommodating such requests where possible, whilst preserving strategy coherence and connectivity. This balance is vital to ensure strategies are ambitious yet realistic visions for nature recovery.

#### Provision of information by local authorities

Government also sought views on provision of information that could help responsible authorities to prepare their strategies. Consultation responses showed strong support for requiring information on local wildlife sites held by local authorities to be shared with relevant responsible authorities. Responses also identified other relevant locally held datasets that might be made available and the government recognises the important contribution that this high-quality local data can make.

However, such datasets are often sensitive or of commercial value and have varied licensing conditions involving private bodies which need to be considered carefully case by case.

The government regulations also include a requirement on local planning authorities in the strategy area to provide information on the location and area of local nature reserves and relevant sites (including local wildlife sites) unless there is a legitimate reason why the shared information should not become publicly available. The government is also using statutory guidance to encourage wider sharing of local data.

## Part 2: Achieving consistency and resolving disagreements

The role of supporting authorities, established in regulations, will be critical to driving collaborative working and promoting consistency between local nature recovery strategies. Responsible authorities will have to take all reasonable steps to involve supporting authorities in strategy preparation and seeking their support before consulting on or publishing their local nature recovery strategy.

The government's approach is designed to incentivise close collaboration between the responsible authority and supporting authorities from the earliest stages of strategy preparation and to facilitate timely consideration and resolution of disputes at a local level wherever possible. However, where local agreement cannot be found, the Defra Secretary of State will have the power to adjudicate to enable strategy preparation to progress.

The government's approach builds on clear preferences expressed in responses to the consultation. Specifically, that each strategy should be subject to independent 'sign-off' before publication and that disputes can be raised during the preparation process. The choice of which bodies should be supporting authorities is also closely based on the most popular consultation responses in this regard, as is the combination of specific requirements and broad principles for how responsible and supporting authorities should work together.

Supporting authorities will be asked for their agreement to the responsible authority launching its public consultation and will be able to raise concerns about the strategy itself, or how it has been prepared. The government's approach also permits them to raise disputes on behalf of others, giving force to the requirement for the responsible authority to consider how they intend to involve supporting authorities and others in strategy preparation, prior to consultation.

Supporting authorities will also be able to raise targeted objections prior to publication, after the responsible authority has made any amends resulting from the consultation. Disputes may be raised where the supporting authority considers that parts of a final local nature recovery strategy cannot be justified based on the results of the consultation or that there are other significant problems with the final version.

This approach seeks to enable legitimate challenges to be raised regarding changes made to the strategy after consultation but prior to publication, whilst discouraging the raising of obstructive and/or non-significant disputes late in the process.

Where disputes have been raised, responsible authorities should make all efforts to resolve them locally to enable consultation or publication to proceed. In the rare circumstances where disputes prove insoluble locally and are escalated to the Defra Secretary of State, responsible authorities will need to explain what steps they have taken to resolve the matter locally.

Supporting authorities will also need to provide relevant information regarding the content and context of disputes. This seeks to deter the raising of obstructive or spurious disputes on the part of supporting authorities, as well as poor collaboration on the part of responsible authorities.

The consultation sought views on which body or bodies might consider disputes on behalf of the Defra Secretary of State in the unlikely event of escalation. Having considered the options, government has decided that whether and who to appoint should remain at the Defra Secretary of State's discretion to decide on a case-by-case basis, noting the preferences expressed in the consultation.

The government has carefully considered whether to set out in regulations the specific grounds on which responsible and supporting authorities might disagree and the remedies available to the Defra Secretary of State in resolving a disagreement and has decided against doing so. This is because robustly providing for all the different potential scenarios would add considerable length and complexity to the regulations and establish process that could delay strategy preparation rather than streamline and improve it.

Natural England, as a supporting authority for all local nature recovery strategies, will have a key role to play in supporting overall strategy progress and providing advice. They will be able to identify any strategy areas where progress is slow or collaboration poor and provide support early in the preparation process to help find resolutions and avoid delay.

### Part 3: Publication of local nature recovery strategies

The Environment Act 2021 requires that each responsible authority publishes their local nature recovery strategy.

The government is requiring through regulations that responsible authorities must provide a copy of their strategy to the Defra Secretary of State. The regulations set broad requirements on the format in which it should be provided to the Defra Secretary of State, so that the key parts of each strategy can be separated out, collated nationally, and made available.

This reflects very strong consultee support for local nature recovery strategies to be brought together to provide a national perspective. It will also encourage consistency in the presentation of local nature recovery strategies whilst still allowing flexibility for responsible authorities to decide exactly how to present them, which was also supported by consultation responses.

To support this, the regulations prohibit responsible authorities from amending published strategies without the Defra Secretary of State's written agreement, which will only be provided in exceptional circumstances.

This reflects consultee concerns about the impracticality of maintaining and using a 'live' strategy (the government's approach to strategy review and republication is set out in Part

4). It also seeks to address concerns that in some unusual circumstances, amendments could be necessary to avoid the strategy becoming obsolete or undermined.

## Part 4: Review and republication of local nature recovery strategies

Regulations set out when local nature recovery strategies should be reviewed, what a review must entail and requirements in relation to the republished strategy. Statutory guidance explains what a republished strategy should contain (see also parts 5 and 6).

All local nature recovery strategies should be reviewed and republished at the same time. This was the preferred response from the consultation. Responses on how often a review should take place revealed strong support for there to be rules but there were mixed views on how prescriptive or flexible they should be.

The government is, therefore, taking a balanced approach of requiring the Defra Secretary of State to initiate reviews of all local nature recovery strategies every 3 to 10 years. Strategy reviews will look at what progress has been made and assess how all elements of the local nature recovery strategy should be updated.

All of the requirements set out in parts 1 to 3 will apply to the process of reviewing the local nature recovery strategy and how it must be republished. For instance, responsible authorities will need to reconsider how they intend to involve stakeholders in preparation, update their publicly available information, and work closely with supporting authorities. Republished strategies will also be subject to public consultation before publication.

The government states, in its statutory guidance, that responsible authorities should map where action has been taken as part of their republished strategies. Regulations require that this information be provided to the Defra Secretary of State in a format that will enable this to be compiled nationally.

# Information to be included in a local nature recovery strategy

Section 106 of the Environment Act 2021 requires that all local nature recovery strategies must contain a statement of biodiversity priorities and local habitat map and lists what both must include.

Statutory guidance expands upon what is required by the Environment Act 2021 to help responsible authorities prepare high quality strategies that will support nature's recovery and meet their legal requirements.

The guidance encourages responsible authorities to create the content of their local nature recovery strategy in a particular order. This order is closely based on the approach tested

in the <u>5 local nature recovery strategy pilots</u> and forms a logical, stepwise process that the responsible authority can follow with local partners to involve them at key decision points. These steps are depicted in Figure 1.

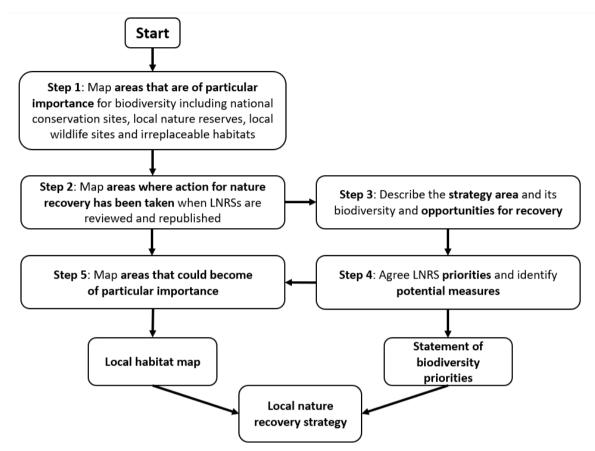


Figure 1: Order of steps to be followed in preparing contents of a local nature recovery strategy

### Part 5: Statement of biodiversity priorities

The Environment Act 2021 requires that all statements of biodiversity priorities set out:

- a description of the strategy area and its biodiversity
- a description of the opportunities for recovering or enhancing biodiversity in the strategy areas
- the priorities for recovering or enhancing biodiversity
- proposals as to potential measures relating to those priorities

The first and second of these elements together form step 3 in Figure 1 whilst the third and fourth elements form step 4.

The government's statutory guidance reflects responses to the consultation by encouraging all responsible authorities to take a similar approach to their statement of biodiversity priorities but not prescribing additional structure or detailed requirements.

For example, statutory guidance sets out issues for all responsible authorities to consider in the description of their strategy area, based upon the preferences expressed in the consultation, but not how they should do so or what their strategy should look like as a result.

#### Description of strategy area and opportunities for biodiversity recovery

The description and opportunities for biodiversity recovery provide the baseline assessment from which choices can be made about what each strategy is seeking to achieve.

Statutory guidance also encourages neighbouring responsible authorities to collaborate on how they approach their description of the strategy area, such as use of sub-areas based on similarity in biodiversity, to help promote join-up. It does not prescribe the type of sub-areas to be used in strategy area description.

This reflects the fact that consultation preferences were mixed, and different approaches are likely to suit different areas. Guidance also encourages join-up with adjacent marine areas and plans for coastal areas to further help strategies be truly strategic and joined up.

Responses to how 'opportunities for recovering or enhancing biodiversity' might best be described were quite mixed.

Therefore, statutory guidance highlights 2 key considerations, which were the 2 most highly selected options in the consultation:

- describe the relative opportunity for creating more areas of key habitats as well as making them bigger, better and joined up
- identify rarer habitats and species that the strategy area is suitable for supporting

### **Priorities and potential measures**

The priorities and potential measures identify what the strategy is seeking to achieve and the practical actions that would help to do so. The guidance emphasises the importance of priority setting in delivering on the issues of greatest importance to local people and organisations. It also highlights that priorities identified in the local nature recovery strategies should reflect the contribution that strategy areas can make to relevant national objectives, commitments and targets.

To assist responsible authorities, the government will provide more detailed and up-to-date advice pertaining to national environmental objectives in due course. This reflects the fact that evolving national priorities, commitments and targets are best expressed in a more readily updateable way than in statutory guidance.

Statutory guidance emphasises the importance of undertaking an inclusive, transparent process in identifying potential measures for nature recovery. This should result in a practical and delivery-focused list of proposed actions which is readily understandable by all stakeholders.

It is important to clearly connect priorities with the actions aimed at delivering them. Guidance therefore encourages the identification of potential measures which specify the habitat type being created, restored or managed, so that suitable locations may be mapped more easily. However, as supported by consultation responses, responsible authorities will still be able to identify potential measures that do not relate to specific locations.

Consultation responses also showed strong support for the government to provide a list of potential measures for nature recovery that responsible authorities might choose from or adapt. This would aid consistency and comparability across strategies and to help better tailor strategies to user needs. Such a list would be indicative and would need to be kept up-to-date to align with current wording used by potential funding schemes. Therefore, the government's statutory guidance notes that a list of potential measures may be provided subsequently rather than included in the guidance itself.

### Part 6: Local habitat map

The Environment Act 2021 requires that local habitat maps identify:

- 1. National conservation sites.
- 2. Local nature reserves.
- 3. Other areas of particular importance for biodiversity.
- 4. Other areas 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 ('areas that could become of particular importance').

The first 3 of these required elements are identified at step 1 in Figure 1, as 'areas of particular importance for biodiversity', whilst the final element is created at step 5.

### Areas of particular importance for biodiversity

National conservation sites and local nature reserves are legally protected areas of significant importance for nature. Information on their location and extent is publicly available and they must be included in every local habitat map as areas of importance. It is for the responsible authority to identify other areas of importance for biodiversity and a key task of the statutory guidance is to explain how to do this in a consistent way.

The government has previously committed to local wildlife sites also being mapped as areas of particular importance for biodiversity in the local habitat map, and the statutory guidance states that all responsible authorities should do this.

The government is keen that other areas mapped as being of particular importance for biodiversity complement and support the system of local wildlife sites which already provides a mechanism for identifying areas of local importance for nature. We do not wish to duplicate processes.

The concept of 'irreplaceable habitat' is already used in planning policy to recognise that some habitats, such as ancient woodland, should be protected due to the impracticality of recreating them in new locations as the important ecosystems they support are particularly slow or complicated to fully establish.

The government is bringing forward separate biodiversity net gain regulations that will define which habitats should be considered 'irreplaceable'. Local nature recovery strategy statutory guidance explains that responsible authorities should map these habitats, in addition to local wildlife sites, as being of particular importance for biodiversity in the local habitat map. The government will provide what data we have available nationally to support this.

The government also intends for responsible authorities to collaborate closely with stakeholders who hold relevant local biodiversity data, and where relevant, request data under the provisions set out in regulations (as introduced in Part 1 of this document).

### Areas that could become of particular importance for biodiversity and other environmental benefits

In keeping with the process tested in the 5 local nature recovery strategy pilots, statutory guidance explains that responsible authorities should identify 'areas that could become of particular importance' based on their suitability for implementing the potential measures that will deliver the priorities set out in the statement of biodiversity priorities.

This is consistent with the consultee preference for a standardised approach to mapping these areas.

In line with consultee preferences, the government has not used statutory guidance to steer responsible authorities to identify a certain proportion of the strategy area as an area that could become of particular importance. Instead, guidance encourages responsible authorities to balance ambition with the need to focus effort where it will have most benefit.

Identified locations should be evidence-based and strategic in expanding and connecting existing habitats, linked to practical and deliverable actions. The statutory guidance sets out key things for responsible authorities to consider when undertaking their mapping, including:

- the importance of broad stakeholder engagement, particularly with key delivery bodies, and landowners to understand the likelihood of action being taken in the proposed areas
- analysis of data on existing habitats and land uses, building on the description of opportunities included in the statement of biodiversity priorities
- · use of modelled data and available software

The statutory guidance again directs responsible authorities towards collaborative ways of working which connect and amplify the good work already being done on the ground.

#### Areas where action has been taken to recover nature

The consultation also sought views on whether republished local nature recovery strategies should map where action has been taken to recover nature. There was very strong support for this, and it is therefore included in the statutory guidance and supported by a requirement in the regulations that understanding what action has been taken must form part of the review process. This requirement forms step 2 in Figure 1.

The government is keen that the mapping of action taken is not burdensome and so guidance encourages responsible authorities to make good use of published information and contributions from local partners.

### **Summary of responses**

### Consultation Response: survey, emails and events

Defra received 389 responses to the consultation survey website, 36 of whom sent additional views via email. A further 40 responses were received just via email.

'Individuals and other' formed the largest respondent groups with 117 responses. We also received 91 responses from environmental non-governmental organisations, 70 responses from local authorities and 67 responses from landowners, businesses and representative groups. We also heard from 21 Local Nature Partnerships, 5 National Park Authorities and 3 Area of Outstanding Natural Beauty organisations, as well as the Campaign for National Parks and National Parks England.

Defra held stakeholder workshops and meetings, where suggestions, experiences and options were discussed with Defra officials. These workshops and meetings included:

- Executive directors from major environmental non-governmental organisations
- Local Nature Partnerships
- the Association of Directors of Environment, Economy, Planning and Transport
- the National Association of Local Councils
- the Greater London Authority
- Country, Land and Business Association
- the Catchment Based Approach
- the Royal Town Planning Institute
- a Protected Landscapes Contact Group

As numerous large organisations responded to the consultation, the written narrative provides important context for the interpretation of the qualitative analytical outputs. This document focuses on the key points raised through consultation responses and associated events. Analysis of responses were conducted by Defra and Natural England. All responses were considered in the development of regulations and statutory guidance. We thank all respondents for their time, consideration and ideas.

### Part 1 Achieving collaboration (Questions 5 to 13)

### Question 5: Which of the groups listed below do you consider essential for the preparation of a local nature recovery strategy?

414 respondents answered this question through the consultation survey, emails and letters. There was strong support for engagement with a wide range of stakeholders. Further, a core group of organisations were consistently selected as essential to the preparation of a local nature recovery strategy (respondents were able to tick multiple options). Responses were as follows:

- 90% said Natural England
- 89% said Local Nature Partnerships, where active and geographically aligned

- 88% said local authorities other than the responsible authority, where the strategy covers more than one local authority area
- 87% said local farming, forestry and landowning groups
- 87% said the Environment Agency
- 86% said Area of Outstanding Natural Beauty organisations, where present in the strategy area
- 85% said environmental non-governmental organisations active in the strategy area
- 85% said National Park Authorities, where present in the strategy area and if not the responsible authority
- 81% said the Forestry Commission
- 75% said individual landowners and land managers (including farmers, both landowners and tenants)
- 70% said Local Records Centres, where separate from any of the other groups listed
- 69% said local authorities adjacent to the strategy areas
- 69% said utilities providers, such as water companies
- 64% said other public bodies for example Highways England
- 56% said members of the public
- 54% said Local Enterprise Partnerships
- 46% said other local business representative bodies
- 35% said individual businesses
- 1% said do not know

### Question 6: Are there any organisations not listed above whose involvement you consider essential?

417 respondents answered this question through the consultation survey, emails and letters. There was support for identification of other organisations considered essential in the preparation of local nature recovery strategies, with 66% of respondents answering yes. 23% of respondents said no and 11% said do not know.

Many respondents noted the importance of involving national and regional environmental non-governmental organisations in the preparation of strategies. Other common suggestions for organisations whose involvement would be essential, included: Town and Parish Councils, Catchment Partnerships, research institutions and local recording groups. Others highlighted the importance of stakeholders with land, farming, coastal, marine, health, heritage and geodiversity interests.

However, others called for local flexibility regarding who should be involved in preparation processes. For example, the Local Government Association commented:

"Local authorities know their area best and have built up relationships with their residents, landowners, land managers, special interest groups and non-government organisations so specifying who should be considered essential in the preparation of local nature recovery strategies is unnecessary and counterproductive."

# Question 7: 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?

415 respondents answered this question through the consultation survey, emails and letters. There was strong support for farmers, landowners and managers to receive additional support to facilitate their involvement with 88% of respondents saying yes. 4% of respondents said no and 8% said do not know.

The Chartered Institute of Ecology and Environmental Management emphasised that "facilitation of productive conversations will be important to gather clear views from stakeholders and handle difficult conversations". The North Pennines Area of Outstanding Natural Beauty Partnership, an organisation involved in the local nature recovery strategy pilots, noted the importance of providing support for local convenors. They said that the role "proved useful in ensuring there was some link up with farmers in our areas" and "staff resource to engage farmers is essential".

Finally, some respondents suggested that environment non-governmental organisations should also receive additional support to facilitate their engagement in the preparation process.

# Question 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?

413 respondents answered this question through the consultation survey, emails and letters. There was strong support for regulations to oblige local authorities to share information on other types of local wildlife site with the responsible authority, with 91% of respondents answering yes. 4% of respondents said no and 5% said do not know.

The Association of Directors of Environment, Economy, Planning and Transport were supportive of this obligation: "There should be a requirement on other local authorities and public bodies to co-operate with the responsible authority and provide the information required to develop the strategy."

Question 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?

415 respondents answered this question through the consultation survey, emails and letters. 46% of respondents said yes and provided details of locally-held information which they believed would not be made available without a requirement. 31% of respondents said no and 23% said do not know.

Many respondents identified data held by Local Environmental Record Centres, environmental non-governmental organisations, and landowners, including the data underpinning farm environment plans. Others identified the importance of data collected by developers for planning applications.

Some respondents provided commentary on potential challenges and solutions surrounding data provision. Challenges included problems of data ownership and licencing, as well as appropriate compensation for costs incurred through data processing.

Wildlife and Countryside Link noted that "in most cases, it should be possible to come to an agreement, perhaps along the lines of the Cumbria local nature recovery strategy pilot where data was used to inform the local nature recovery strategy but boundaries were not published." The Wildlife Trust also pointed to the approach taken by some Local Environmental Record Centres: the creation of reciprocal agreements for data sharing with local authorities.

### Question 10: How do you think neighbouring local nature recovery strategy responsible authorities should be required to work together?

410 respondents answered this question through the consultation survey, emails and letters. There was strong support for collaboration between responsible authorities with 53% of respondents answering that responsible authorities should be required to collaborate when setting objectives for areas close to boundaries.

A further 17% of respondents said that responsible authorities should be required to give information to neighbouring responsible authorities that would help them prepare their strategy. 6% said that responsible authorities should be required to inform neighbouring responsible authorities of their progress in preparing their strategy. 5% said that it should be left to local discretion. 17% said other and 2% said do not know.

Of respondents who answered other, many said that all 3 suggested requirements should be enforced in regulation. For example, the Association of Directors of Environment, Economy, Planning and Transport felt that "neighbouring responsible authorities should be required to work together and share information and their draft priorities, as effective strategies and actions will cross boundaries." Other suggestions included: reference to the existing duty to cooperate, collaboration with existing cross boundary partnerships and exchange of best practice approaches.

Finally, some respondents, such as the Cornwall Catchment Partnership, highlighted the importance of collaboration for non-neighbouring strategy areas where the areas are ecologically interdependent due to migrating species, connection by water or other non-terrestrial link.

## Question 11: Should draft local nature recovery strategies be subject to a local public consultation prior to publication?

417 question respondents answered this question through the consultation survey, emails and letters. There was strong support for local nature recovery strategies to be subject to local public consultation, with 89% of respondents saying yes. 7% of respondents said no

and 4% said do not know.

Some stakeholders who said no disputed the proposed timing of the local public consultation, rather than the consultation itself. For example, the National Forest Company felt "it would be preferable to ensure engagement at an earlier stage, potentially covering higher-level priorities, rather than opening up the detail of the local nature recovery strategy to scrutiny at a late stage."

# Question 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?

414 respondents answered this question through the consultation survey, emails and letters. Generally, respondents felt that individual landowners or managers should not be able to exclude the land they own or manage from being identified as an area that could become of particular importance for biodiversity. 79% of respondents said no, 14% said yes and 7% said do not know.

Additional comments reflected the nuance behind responses. Many respondents were concerned that the exclusion of land could lead to lost delivery opportunities if land ownership changed at an inopportune time in the local nature recovery strategy cycle.

Others called for more information on the mechanisms for strategy delivery and what the strategies are expected to look like as a result. These questions were echoed in the Local Nature Partnership stakeholder workshop. The Sussex Local Nature Partnership queried: "If they are high-level maps of ambition, are they very like the ecological mapping that has already been done, which hasn't been integrated into decision-making processes? If they are more detailed, with more specific opportunities, created with landowners, that is ideal, but obviously that will be more challenging to achieve. Will the strategies be more detailed or less?"

Some respondents emphasised that the non-binding strategies will only be successful if identification of land, as an area that could become of particular importance for biodiversity, is perceived as positive rather than punitive action. The National Forest Company noted: "it will be important to make landowners understand that the inclusion of their land within the local nature recovery strategy does not compel them to give it up for delivery, but that the process may identify opportunities that the landowners may not otherwise have been aware of."

Wildlife and Countryside Link said no and commented that areas should identify the best options for nature recovery through science-driven consensus. However, they also noted: "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 coproduced local nature recovery strategy process would listen to the local stakeholders and may not prioritise those outcomes in that instance."

Further to this point, many of the respondents who said no highlighted the importance of collecting and considering landowner appetite to undertake actions as part of local nature

recovery strategies.

# Question 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?

414 respondents answered this question through the consultation survey, emails and letters. There was strong support for interested parties to be able to propose additional areas that could become of particular importance, with 94% of respondents answering yes. 3% of respondents said no and 3% said do not know.

Some respondents added written commentary emphasising the need for a clear evidence-based process for the identification of additional areas that could become of particular importance for biodiversity. East Riding of Yorkshire Council noted: "There will inevitably be cases where some individuals or groups will propose areas purely in an attempt to thwart development. It is therefore essential that areas identified to become important for biodiversity (and their boundaries) are selected on a credible and objective basis, using appropriate data, to prevent misuse of the local nature recovery strategy process."

Further, the Country Land and Business Association commented: "Land managers must be able to propose areas of importance based either on evidence of importance for nature or proposals for future nature improvement projects."

## Part 2 Achieving consistency and resolving disagreements (Questions 14 to 23)

# Question 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?

412 respondents answered this question through the consultation survey, emails and letters. Responses showed support for a balanced approach to the prescriptiveness of regulations, with 51% of respondents supporting the setting of broad principles and specific engagement requirements on who and how to engage. For example, the Environment Agency noted: "While each local nature recovery strategy will reflect the needs of the local area, there will need to be some guidance to specify the required mix of sectors involved in each local nature recovery strategy – public, private and third sector, national and local. This is needed to make sure the governance structures are effective both in the preparation and delivery of the local nature recovery strategy."

23% of respondents said that the regulations should include a standardised process of who to engage and how. 22% said the regulations should set broad principles and 3% said do not know. Responses were evenly spread across different stakeholder groups.

# Question 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?

412 respondents answered this question through the consultation survey, emails and letters. Responses showed strong support for the creation of a dispute resolution mechanism, with 86% of respondents answering yes. 3% of respondents said no and 10% said do not know.

# Question 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)?

413 respondents answered this question through the consultation survey, emails and letters. There was broad support across the response options (respondents were able to tick multiple options). 54% of respondents selected 2 or more of the proposed public bodies and 34% selected all 3 bodies.

Overall, 67% of respondents said Natural England, 56% said local authorities within the strategy area who are not the responsible authority and 40% said responsible authorities for neighbouring strategy areas. 38% said other and 14% said do not know.

Some stakeholders, including Plantlife and the Royal Town Planning Institute, felt that any interested stakeholder should be able to raise a dispute. Some respondents caveated this view, stating that any stakeholder should be permitted to raise disputes if their stated grounds for dispute are reasonable (criteria for reasonable grounds are explored in Question 17).

Other responses suggested that the ability to raise disputes should be extended to:

- landowner forums and individual landowners
- environmental non-governmental organisations, such as local Wildlife Trusts
- local communities and resident representatives
- Local Nature Partnerships
- any statutory body

# Question 17: Which of the following do you think might be reasonable grounds for raising a dispute about the local nature recovery strategy preparation process?

412 respondents answered this question through the consultation survey, emails and letters. Again, there was broad support across response options (respondents were able to tick multiple options). 57% of respondents selected all 4 of the proposed reasonable grounds for dispute. Responses were as follows:

- 82% said lack of transparency
- 82% said legal requirements not being followed

- 79% said not adequately involving relevant specific groups
- 70% said slow or no progress
- 25% said other
- 5% said do not know

Of the respondents who said other, many suggested that disagreement regarding the inclusion or exclusion of particular habitats should be identified as reasonable grounds for dispute. Another suggestion for reasonable grounds was the failure to consider and contribute to regional or national priorities. Other proposed grounds included: conflict with other statutory requirements, a weak scientific basis and a generally unclear or incomplete strategy.

Other respondents shared caveats, highlighting that reasonable grounds should be context-specific. For example, as grounds for dispute, not adequately involving relevant specific groups could be contingent on the definition of the specific groups.

# Question 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?

408 respondents answered this question through the consultation survey, emails and letters. There was strong support for a process to escalate procedural disputes for external consideration. Only 2% said that there should not be a process for external consideration.

Other responses were as follows (respondents were able to tick multiple options):

- 42% said if the responsible authority does not respond within a reasonable timeframe to being informed of concerns
- 41% said before finalisation of the strategy priorities
- 32% said before a potential public consultation on the draft strategy
- 27% said at any time
- 7% said other
- 10% said do not know

Of respondents who answered other, many said that there should be multiple points in the process during which procedural disputes can be escalated. Some said it was important for regulations to clearly set out the timeframe for responsible authorities to deal with disputes prior to escalation. Others noted that the ability to escalate disputes should depend on the nature of the dispute and its severity.

# Question 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?

412 respondents answered this question through the consultation survey, emails and letters. There was support for an external sign-off. 64% of respondents said yes, as well as a mechanism for resolving disputes in the preparation process. Responses were evenly spread across different stakeholder groups. 18% of respondents said no, 8% said yes,

instead of a mechanism for resolving disputes in the preparation process and 10% said do not know.

Of the respondents who said no, some noted that additional sign-off should be unnecessary if appropriate scrutiny was built into the preparation process. For example, the Local Government Association noted that "if it is a standalone document then, so long as the recommended levels of partnership working have been met, there is no reason why a separate body would need to sign off the strategy before publication."

## Question 20: If so, which bodies should be given sign-off responsibility?

404 respondents answered this question through the consultation survey, emails and letters. There was support for Natural England to be given sign-off responsibility, with 58% of respondents selecting this option. The Association of Directors of Environment, Economy, Planning and Transport noted that "Natural England could have a role in quality assuring the process rather than the priorities identified locally, confirming that minimum standards as prescribed in guidance and regulation have been met."

Respondents were able to tick multiple options. 21% said both Natural England and other local authorities in the strategy area. Other responses were as follows:

- 29% said other local authorities in the strategy area
- 24% said other
- 8% said do not know

A wide range of other bodies were suggested by respondents who said other. These included: Defra (or a Defra body), Wildlife Trusts, Local Nature Partnerships, the Environment Agency, Protected Landscapes, local communities and panels of stakeholder representatives.

## Question 21: On what grounds could a body refuse to sign-off a local nature recovery strategy?

396 respondents answered this question through the consultation survey, emails and letters. There was support for bodies to be able to refuse to sign-off on any reasonable grounds. 52% of respondents selected this option. Respondents were able to tick multiple options.

There was also support for other proposed grounds, as follows:

- 31% said disagreement about the inclusion or exclusion of specific areas of potential importance
- 30% said disagreement about overall priorities
- 28% said disagreement about specific priorities
- 25% said disagreement about potential measures
- 11% said only the responsible authority should be required to sign-off the strategy
- 15% said other
- 9% said do not know

Of the respondents who said other, many highlighted similar criteria to those raised in question 17, in reference to reasonable grounds for dispute, such as the failure to follow legal requirements or failure to consult appropriately. For example, Southend-on-Sea Borough Council commented that "reasons for refusing to sign-off should be linked to non-compliance with the regulations". Some respondents also felt that sign-off should be refused where the body deems the local nature recovery strategy to conflict with other government regulations or processes.

# Question 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?

408 respondents answered this question through the consultation survey, emails and letters. Responses reflected support for the appointment of a separate body. 46% of respondents stated the Secretary of State should be able to appoint Natural England.

15% of respondents said whichever body the Secretary of State considers appropriate, 14% said Planning Inspectorate, 10% said the responsible authority for a different local nature recovery strategy and 8% said it should not be possible for a separate body to be appointed. 18% of respondents said other and 11% said do not know.

Of the respondents who said other, many suggested the Office for Environmental Protection would be an appropriate body. Some suggested an independent body should be formed, drawing on ecological and legal experts, and representatives from other bodies. Other suggested bodies included local Wildlife Trusts and the Environment Agency.

## Question 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 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
- other or
- do not know

412 respondents answered this question through the consultation survey, emails and letters. Responses reflected support for the Secretary of State being able to make certain requests of the responsible authority (respondents were able to tick multiple options). Responses were as follows:

- 54% said require the responsible authority to repeat parts of the preparation process
- 52% said require the responsible authority to make specific changes to their local nature recovery strategy
- 30% said approve the local nature recovery strategy with or without changes
- 13% said other
- 14% said do not know

Of the respondents who said other, many suggested the Secretary of State should not be

involved or that the range of Secretary of State's possible actions should be dependent on the nature of the dispute. Some respondents felt the Secretary of State should be able to appoint an alternative responsible authority and act on their recommendations.

## Part 3 Publication of local nature recovery strategies (Questions 24 to 28)

## Question 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?

409 respondents answered this question through the consultation survey, emails and letters. There was strong support for consistent data standards and formatting with 85% of respondents answering yes. 9% said no and 6% said do not know.

Written responses highlighted concerns that overly prescriptive standards for consistency could create barriers to the use of locally available data. The Association of Local Government Ecologists commented:

"Regulation and statutory guidance can set a minimum standard, but it must not prevent innovation and ambition at the local level. However, it is vital that there is sufficient flexibility within the process so that the local nature recovery strategies can meaningfully address local nature recovery needs, draw on additional data/mapping that might be available, respond to local drivers and priorities, and work with local delivery mechanisms".

### Question 25: If yes, how should this level of consistency be established?

389 respondents answered this question through the consultation survey, emails and letters. There was broad support for consistency to be achieved through templates and advice from Natural England, with 65% of respondents answering creation of standard templates and 57% answering advice from Natural England. Other responses were as follows (respondents were able to tick multiple options):

- 33% said specified in regulations made under clause 101
- 22% said by consensus amongst responsible authorities
- 18% said other
- 4% said do not know

Some respondents called for specific guidance on aspects like terminology, map symbols and adequate resourcing. Others were keen that data standardisation should not slow down the first round of local nature recovery strategies, given the opportunity to improve standardisation in future cycles. The Lincolnshire Wildlife Trust noted: "We can aspire to reach some level of consistency across England and work towards it in regards to data standards consistency over time".

## Question 26: Do you think that each statement of biodiversity priorities should also be published in a similar format?

411 respondents answered this question through the consultation survey, emails and letters. There was support for some specific requirements to be made regarding in format, with some local discretion regarding presentation. 52% of respondents said that there should be some specific requirements, but the responsible authority should keep some discretion over presentation. In reflecting upon the lessons learned from the pilots, the Wildlife and Countryside Link commented that "there was variation in the format of the biodiversity statements amongst the pilots and this should be allowed to continue, as long at the details of the outcomes and measures are accessible in some way".

33% of respondents said the format should be the same, 13% said the responsible authority should be able to decide how they present their strategy so long as it meets legal requirements and 2% said do not know.

# Question 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?

412 respondents answered this question through the consultation survey, emails and letters. There was strong support for local nature recovery strategies to be published on a single national website with 95% of respondents answering yes. 2% of respondents said no and 3% said do not know.

Tarmac Trading commented on the benefits of this approach: "Publication of local nature recovery strategies on a single national website will provide clarity and accessibility of the spatial strategies for stakeholders such as Tarmac, who have a large, cross-boundary land portfolio".

## Question 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 is part of a scheduled review process or
- do not know

409 respondents answered this question through the consultation survey, emails and letters. There was support for local nature recovery strategies to remain unchanged between reviews, with 61% of respondents answering that local nature recovery strategies should not be changed unless it is part of a scheduled review process.

Further to this point, the Chartered Institute of Ecology and Environmental Management explained that "ad-hoc changes would make it hard to keep up over time. The existing duty to review local plans provides an example for how local nature recovery strategies can be updated. Local nature recovery strategies should be reviewed at least every 5 to 10 years and local nature recovery strategies with overlapping features should be published and reviewed at a similar time to maintain a consistent approach".

Other respondents suggested that changes, outside of the scheduled review process, should only take place in exceptional circumstances. For example, "where there is major land use change, a natural disaster or to meet new legislative requirements" (the Woodland Trust) or where there is an inaccuracy in mapping which is "preventing a farm business from using land in the appropriate way" (the National Farmers Union).

14% of respondents said the published strategy should only be changed with the Secretary of State's permission. 14% said it should only be changed once the Secretary of State has been notified and 11% said do not know.

## Part 4 Review and republication of local nature recovery strategies (Questions 29 to 30)

## Question 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?

410 respondents answered this question through the consultation survey, emails and letters. Responses reflected support for a nationally set review and republication timescale for local nature recovery strategies. 53% of respondents said it should be set nationally. 42% of respondents said it should be decided locally and 5% said do not know.

The National Trust called for a nationally set rolling period of review "to allow for different speeds of initial publication", noting 2 key contingencies to a national timeframe: "1) ensuring there is enough time and capacity/resource to deliver them in the first place and 2) that they are delivered with a degree of consistency at least in terms of baseline data and broad content."

Buckinghamshire and Milton Keynes Natural Environment Partnership also highlighted the importance of alignment with local decision-making and reporting, including preparation of local plans and 5-yearly reporting by public authorities in adherence to section 40 of the Natural Environment and Rural Communities Act 2006 general duty to conserve and enhance biodiversity.

# Question 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?

366 respondents answered this question through the consultation survey, emails and letters. Responses reflected support for a fixed period, with 36% of respondents answering that there should be a regular fixed period between reviews. Some respondents, including South East Nature Partnership, raised concerns that without a fixed period between reviews, the process would be "likely to drift and not be prioritised."

Other responses were as follows:

- 29% said a maximum and a minimum period of time between reviews should be set
- 23% said a maximum period of time between reviews should be set

- 3% said a minimum period of time between reviews should be set
- 1% said the Defra Secretary of State should be able to decide
- 8% said do not know

## Part 5 Statement of biodiversity priorities (Questions 31 to 40)

## Question 31: Do you think that all responsible authorities should take a consistent approach to describing the biodiversity in their strategy area?

411 respondents answered this question through the consultation survey, emails and letters. Responses reflected strong support for a consistent approach to describing biodiversity in their area, with 86% of respondent selecting this option. 7% said no and 7% said do not know.

## Question 32: If yes, do you have a preference as to how sub-areas based on similarities in biodiversity should be identified?

383 respondents answered this question through the consultation survey, emails and letters. Broadly, respondents showed a preference for National Character Areas and allowing responsible authorities to decide. 27% of respondents said National Character Areas should be used for identifying sub-areas based on similarities in biodiversity, whilst 26% said that responsible authorities should be able to decide. 13% said that they had no preference and 11% said river catchments. Finally, 14% said other and 9% said do not know.

Of the respondents that said other, some emphasised the importance of flexibility, whilst others felt that habitats, soils and geology or a combination of National Character Areas and river catchments should form the basis for identifying sub-areas.

# Question 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?

414 respondents answered this question through the consultation survey, emails and letters. There was broad support across the response options, with 56% of respondents selecting all 5 proposed suggestions (respondents were able to tick multiple options). Responses were as follows:

- 85% said environmental issues in the strategy area that might be addressed through nature-based solutions
- 83% said existing significant nature or environment projects

- 80% said anticipated future pressures on land use
- 77% said climate change scenarios
- 74% said how land use or habitat distribution has changed over time
- 33% said other
- 3% said do not know

Other suggestions, made through the free-text option, included: soils and geology, water resources, water quality and hydrology, plans or opportunities for nature-based solutions, restoration or rewilding, natural capital assessments, connectivity assessments, habitat and network resilience thresholds, green infrastructure and historic environment.

# Question 34: How should the statement of biodiversity priorities describe opportunities for recovering or enhancing biodiversity without mapping them?

414 respondents answered this question through the consultation survey, emails and letters. Responses showed broad support for the suggested options for inclusion in the statement of biodiversity priorities without mapping. 53% of respondents selected 4 or more of the suggested options (respondents were able to tick multiple options). Responses were as follows:

- 75% said describe the relative opportunity for creating more areas of key habitats as well as making them bigger, better and joined up
- 72% said identify particular rarer habitats and species that the strategy area is suitable for supporting
- 68% said assess the potential to contribute to national priorities for nature recovery
- 64% said indicate broad areas where creating improving habitat may be more achievable
- 61% said assess the potential for use of nature-based solutions
- 24% said however the responsible authority finds most useful
- 20% said other
- 6% said do not know

Of the respondents that said other, the most common suggestions were:

- describe areas for recovering soils or geodiversity
- identify sympathetic landowners or land management systems
- describe areas of opportunity for green infrastructure or public access
- describe areas where historic environment should be considered

For example, Somerset Local Nature Partnership emphasised the importance of capturing broader landscape biodiversity priorities which could not be mapped, such as "soils, hedgerows, and farmland habitats such as buffer strips."

# Question 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?

410 respondents answered this question through the consultation survey, emails and letters. There was support for priority setting processes to follow the same high-level principles but with local discretion. Buckinghamshire and Milton Keynes Natural Environment Partnership suggested that high-level principles should include: "consideration of national environmental priorities and ensuring neighbouring local nature recovery strategy collaboration across administrative boundaries."

71% of respondents said that strategies should follow the same high-level principles but with local discretion. 21% said that all strategies should follow the same priority setting process. A further 5% felt that strategies should decide for themselves how to prioritise and 3% said do not know.

## Question 36: How should national environmental priorities be reflected when setting local nature recovery strategy priorities?

411 respondents answered this question through the consultation survey, emails and letters. There was support for responsible authorities to show how they have considered national priorities, with 66% of respondents selecting this option.

A joint letter from several local authorities within the Liverpool City Region, prepared by the Merseyside Environmental Advisory Service, added: "A limited defined list of national priorities would be advisable, for example Natural Capital, Climate Emergency etc. Each responsible authority can then indicate how their local nature recovery strategy contributes to these national priorities."

Other responses were as follows:

- 20% said local priorities should follow a consistent nationally-set structure
- 6% said national priorities should be advisory
- 5% said other
- 3% said do not know

# Question 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?

411 respondents answered this question through the consultation survey, emails and letters. There was clear support for listing priorities and other relevant lower priority outcomes, with 87% of respondents selecting this option. In support of this option, the Chartered Institute of Ecology and Environmental Management commented: "Being a priority implies they have been screened and decided they are urgent. Responsible authorities must be aware of changes as local nature recovery strategies will exist in a dynamic situation, and so, listing lower priorities opens flexibility in a change of circumstances."

7% of respondents said the responsible authority should be allowed to decide, 2% said that the strategies should list only priorities and 4% said do not know.

# Question 38: How should priorities identified in other environmental spatial plans in the strategy area be incorporated into the local nature recovery strategy?

410 respondents answered this question through the consultation survey, emails and letters. There was support for priorities identified in other environmental spatial plans to be considered and prioritised alongside other outcomes. 65% of respondents selected this option. 24% of respondents said that they should incorporated directly and 11% said do not know.

Additional comments to this question highlighted specific environmental spatial plans for consideration. These included: local climate action plans, marine plans for nature recovery, river basin management plans, shoreline management plans, green transport plans and regional plans.

# Question 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?

412 respondents answered this question through the consultation survey, emails and letters. There was strong support for both, with 92% of respondents selecting this option. 4% said no, only potential measures that can be mapped should be included. Finally, 4% said do not know.

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

411 respondents answered this question through the consultation survey, emails and letters. There was support for a core list of potential measures which could be added to, with 67% of respondents selecting this option. 21% of respondents said that there should be a list of suggestions. 4% said no, responsible authorities should have free choice. 4% said that responsible authorities should only be able to choose measures included on a national list. Finally, 4% said do not know.

### Part 6 Local habitat map (Questions 41 to 44)

# Question 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?

417 respondents answered this question through the consultation survey, emails and letters. There was broad support across the suggested areas, with 73% of respondents

selecting all 4 options (respondents were able to tick multiple options). Respondents selected the various response options as follows:

- 83% said ancient woodlands
- 82% said flower rich meadows
- 80% said priority habitats in good condition
- 76% said areas used for feeding or resting by animals or birds from a nearby national conservation site
- 59% said any areas the responsible authority chooses
- 45% said other

Common suggestions made by respondents who said other were as follows:

- priority habitats whatever their condition
- areas for rare or priority species
- wetlands, peatlands, riverine, marine and intertidal habitats
- · wildlife corridors, hedgerows and verges
- nature reserves and areas where conservation activity is being undertaken

# Question 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?

411 respondents answered this question through the consultation survey, emails and letters. There was support for responsible authorities to follow a standardised process for mapping potential measures, with 69% of respondents answering yes. 19% said no and 12% said do not know.

In support of standardisation, the National Farmers Union (NFU) commented: "The NFU believes there is a need for a standardised process for mapping potential measures that could be of future importance. This should focus on the need for sound scientific evidence alongside the need to consult land managers to ensure accuracies and deliverability."

Norfolk and Suffolk Local Nature Recovery Partnership felt that local discretion in the application of standardised processes was also important; "A variety of tools could be used (for example, natural capital mapping): these need to be available and understood, but there should be local discretion on their use...with standardisation of specific elements for example, a common approach for identifying how certain measures could be deployed in some areas...and a clear indication on where ELMS [Environmental Land Management schemes] and BNG [Biodiversity Net Gain] would be relevant."

# Question 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?

410 respondents answered this question through the consultation survey, emails and letters. There was support for local areas deciding what proportion of their strategy area

could become of particular importance for biodiversity or wider environmental outcomes. 72% of respondents said no, a similar proportion of the strategy area should not be set and should be decided locally. 18% said yes, there should be a set percentage each responsible authority should identify. 10% said do not know.

The UK Environmental Law Association highlighted the importance of local identification and national coordination of the proportions of strategy areas that could become of particular importance for biodiversity or wider environmental outcomes "in order to meet environmental targets nationally and internationally."

# Question 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?

411 respondents answered this question through the consultation survey, emails and letters. There was strong support for mapping where appropriate action has been taken, with 94% of respondents answering yes. 1% of respondents said no and 5% said do not know. The Chartered Institute of Ecology and Environmental Management commented: "The addition of a map showing where appropriate action has been taken can help set priorities for the next iteration."