

Response ID ANON-9AVK-T52E-U

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

1 What is your name?

Name:
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2 What is your email address?

Email:
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3 What is your organisation?

Organisation:
Association of Drainage Authorities

4 Would you like your response to be confidential?

No

If you answered Yes to this question, please give your reason.:

The procedure to be followed in the preparation and publication, and review and republication, of Local Nature Recovery Strategies

Achieving collaboration

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

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

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

Yes

If yes, which ones and why?:

Internal Drainage Boards (IDBs) manage water levels across just over 9% of the area of England, which would otherwise be naturally flooded. Just under 20,000 km of freshwater courses are under IDB management in these areas which makes IDBs collectively one of the largest managers of freshwater and wetland habitats and species in England. Consequently, IDBs have a critically important role to play in conserving and enhancing these habitats in particular.

In terms of the availability of local nature data available to the LNRS, each of the 112 IDBs nationally are required to produce a Biodiversity Action Plan identifying valuable local nature priorities and actions within their districts. These plans include a biodiversity audit and the action the IDB will take to contribute towards the enhancement and support of that biodiversity, both through their own statutory functions and the consenting of the activities of others on IDB watercourses. They will most often have been developed with the support of other local environmental managers including Local Authorities, Local Nature Partnerships, Wildlife Trusts and Natural England. These BAPs and the IDBs unique local knowledge will be very valuable to the development of Local Nature Recovery Strategies and very much aligned with the scope of them. In particular, on a local scale, IDB technical expertise, infrastructure and local knowledge of freshwater networks will be key in identifying opportunities for Natural Flood Management and the management of valuable water-sensitive habitats.

Every landowner within an Internal Drainage Board district is required to pay a drainage rate to the IDB for their water level management services. Representatives of these landowners make up the elected members of each IDB Board. As a result IDBs have access to a large network of local landowners and managers which would be of great value in the development and management of a LNRS.

ADA has recently provided revised BAP templates and other technical environmental guidance for IDBs which have included the requirements which are expected to be placed upon IDBs through the Environment Bill such as LNRS development. ADA can continue to provide this support and national

guidance to IDBs to ensure a consistent approach to engagement with LNRS development.

Achieving collaboration

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

Yes

Achieving collaboration

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?

Yes

Achieving collaboration

9 Are you aware of specific locally-held information that would make an important contribution to the preparation of Local Nature Recovery Strategies that you do not believe would be made available without a requirement to do so?

Don't Know

If yes, what information should be included? :

Achieving collaboration

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

Required to collaborate when setting objectives for areas close to boundaries

If other, please specify.:

Achieving collaboration

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

Don't Know

Achieving collaboration

12 Should individual landowners or managers be able to decide that land they own or manage should not be identified by a Local Nature Recovery Strategy as an area that could become of particular importance for biodiversity?

No

Achieving collaboration

13 Should anyone interested in the Strategy be able to propose additional areas that could become of particular importance if these can be shown to be making a sufficient contribution to the overall objective of the Strategy?

Yes

Achieving consistency and resolving disagreements

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

Setting broad principles and specific requirements on who to engage or how

Achieving consistency and resolving disagreements

15 Do you think that regulations made under clause 101 should establish a mechanism for resolving disputes in the preparation of Local Nature Recovery Strategies?

Yes

Achieving consistency and resolving disagreements

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

Local Authorities within the Strategy area who are not the responsible authority, Natural England, Responsible Authorities for neighbouring Strategy areas

If other, please specify.:

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

Slow/no progress, Lack of transparency, Legal requirements not being followed

If other, please specify.:

Achieving consistency and resolving disagreements

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?

If the responsible authority does not respond within a reasonable timeframe to being informed of concerns

If other, please specify.:

Achieving consistency and resolving disagreements

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?

Yes – as well as a mechanism for resolving disputes in the preparation process

20 If yes, which bodies should be given sign-off responsibility?

Other Local Authorities in the Strategy area, Natural England

If other, please specify.:

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

Don't Know

If other, please specify.:

Achieving consistency and resolving disagreements

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?

Don't Know

If other, please specify.:

Achieving consistency and resolving disagreements

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

Don't Know

If other, please specify.:

Publication of Local Nature Recovery Strategies

24 Do you think that each local habitat map should adopt the same data standards and be published in the same format to facilitate national collation?

Yes

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

Don't Know

If other, please specify.:

Publication of Local Nature Recovery Strategies

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

There should be some specific requirements but the responsible authority should keep some discretion over presentation

Publication of Local Nature Recovery Strategies

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

Yes

Publication of Local Nature Recovery Strategies

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

Don't Know

Review and republication of Local Nature Recovery Strategies

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

Set nationally

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

There should be a regular fixed period between reviews

Statement of Biodiversity Priorities

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

Yes

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

Don't Know

If other, please specify.:

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?

Anticipated future pressures on land use (e.g. broad indications of housing and infrastructure need), Environmental issues in the Strategy area that might be addressed through nature-based solutions, Existing significant nature or environment projects (e.g. landscape scale work), Other [please specify]

If other, please specify.:

A description of the strategy area should describe the main threats to water resources and quality and key opportunities for improvements.

All life depends upon water. Its quality and quantity are the determining factors in the diversity, abundance and health of all species and habitats on earth. However, climate change poses a direct threat to nature and people through the changing availability of water. In the UK, more frequent and intense flooding, and longer periods of drought are the top risks we can expect to face as a result of this climate change. Mitigating and adapting to these risks must be the top priorities which must be considered by the LNRS if the objectives of recovering nature are to be achieved.

Flood Risk Management Plans, including surface water flood risk plans will be vital in understanding the areas where action could be prioritised to help to improve resilience against these weather extremes. River Basin Management Plans will also help to inform the current priorities relevant to freshwater biodiversity and water quality. Water quality is often the dominant factor which affects whether a valuable nature area is capable of achieving a favorable condition, even where water levels are favorable, so action to improve and maintain good water quality should be a key focus for LNRS.

Statement of Biodiversity Priorities

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

Don't Know

If other, please specify.:

Statement of Biodiversity Priorities

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?

Strategies should follow the same high-level principles but with local discretion

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

Responsible authorities should show how they have considered national priorities

If other, please specify.:

37 Should Local Nature Recovery Strategies identify only those outcomes for nature recovery and environmental improvement that are of priority or also include those that are positive but of lower priority?

List priorities and other relevant lower priority outcomes

Statement of Biodiversity Priorities

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

Incorporated directly

Statement of Biodiversity Priorities

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

Yes both

Statement of Biodiversity Priorities

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

There should be a core list which the responsible authority can add to

Local Habitat Map

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

Ancient woodlands, Flower rich meadows, Priority habitats in good condition, Areas used for feeding or resting by animals or birds from a nearby national conservation site

If other, please specify.:

Local Habitat Map

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

Yes

Local Habitat Map

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?

No, this should not be set and decided locally

Local Habitat Map

44 Do you think that when Strategies are reviewed and republished, they should map where appropriate action has been taken to make areas of increasing importance for biodiversity?

Yes

Consultee Feedback on the Online Survey

45 Overall, how satisfied are you with our online consultation tool? Please give us any comments you have on the tool, including suggestions on how we could improve it.

Neither satisfied nor dissatisfied

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