

ADEPT response to Local Nature Recovery Strategies consultation

2nd November 2021

by email to: localnaturerecoverystrategies@defra.gov.uk

Introduction

1. ADEPT is the Association of Directors of Environment, Economy, Planning and Transport. We are a professional association that represents executive 'directors of place' from county, unitary and combined authorities, along with directors of local enterprise partnerships, sub-national transport bodies and corporate partners drawn from key service sectors. More than two thirds of households in England rely on services provided by ADEPT members including housing, environmental and regulatory services, planning, development, culture, and highways and transport. ADEPT represents its members' interests by proactively engaging government on emerging policies & issues, promoting initiatives aimed at influencing government policy, and through the sharing of best practice, professional networking and development opportunities. Our strategic priorities include climate change and the environment; infrastructure and communities; and place-based funding.
2. Please note that ADEPT is also part of the Blueprint Coalition that is submitting a separate response to this consultation. Other members of the Coalition are:
 - Ashden
 - Friends of the Earth
 - Grantham Institute (at Imperial College, London)
 - Green Alliance
 - Greenpeace
 - LEDNet (London Environment Directors' Network)
 - PCAN (Place-based Climate Action Network at LSE, University of Edinburgh, University of Leeds and Queens University Belfast)
 - SOLACE (Society of Local Authority Chief Executives).With support from the Local Government Association and London Councils.
3. Please consider our response in conjunction with that submitted by the Blueprint Coalition. We are also aware that some individual member local authorities, including some of those that were Local Nature Recovery Strategy (LNRS) pilots, are submitting their own local responses as well as being party to this collective response.

Key messages

4. ADEPT welcomes and supports the government's broad ambition set out in the 25 Year Environment Plan for this to be the first generation that leaves the environment in a better state than that in which we inherited it. We strongly support the forthcoming statutory LNRSs to provide comprehensive place-based strategies that will establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits. We support related proposals in the Environment Bill in respect of biodiversity net gain (BNG) and species and habitat protection. The challenge is to translate these bold ambitions into effective outcomes, this will require strong political and professional leadership to achieve.
5. We welcome the chance to respond to this consultation, and appreciate the efforts of Defra officials to engage informally with the local government sector as they have started to consider

developing the regulations and guidance for when the Environment Bill finally reaches the end of the legislative process. Four of our members were LNRS pilot authorities, we have worked with them and with colleagues from Defra and Natural England to understand and communicate the lessons learned from the pilots. Some of our members have also worked with Defra on a survey to assess the shortage of ecological skills and capacity in local authorities.

6. Effective governance and delivery are key:

- We welcome the recognition of the importance of a place-based approach and local delivery if the aims of the Bill and wider 25 Year Environment Plan are to be achieved. It is right that the LNRS lead role as responsible authority is placed at the strategic level of local government – unitary and combined authorities, and county councils.
- LNRSs must not just be technically robust documents but be realistic and deliverable plans for action, and local authorities must be adequately resourced and supported over the long term to ensure their success.
- It is essential that relevant partners, organisations and individual stakeholders are properly consulted and engaged in the preparation of LNRSs but that they do not have a veto over the final proposals and priorities identified.
- Nationally, the successful delivery of LNRSs will require government to align the various policies and funding streams that relate to nature and the environment, including agricultural policy and the reformed planning system.
- Locally, the successful delivery of LNRSs will require responsible authorities to align their LNRS with other key local strategies (including those for transport, local enterprise, public health, and tackling the climate emergency), and with neighbouring LNRSs.
- In particular, we want to emphasise the need to align with local climate action plans – we are in the middle of nature and climate emergencies, one cannot be solved without the other, and LNRSs must identify opportunities for mitigation (e.g. carbon sequestration) and adaption.
- We are ambitious for LNRSs to become an essential part of wider, co-ordinated place-based strategies that can be a driver for additional local powers and resources as the government develops its proposals for further devolution and county deals.

Skills and capacity

7. Local authorities need the skills and capacity to be able to develop and implement successful LNRSs. Ecology and other environmental services have been reduced considerably as council funding and budgets have decreased over many years. We understand that around half of local authorities no longer have in-house ecological expertise. Where it does exist, it is stretched and often shared between a number of authorities. Skills and capacity will also be needed to fulfil other new duties such as delivering BNG through the planning system.
8. Developing the skills and capacity will require these new duties to be fully funded by government. This funding will need to be ongoing if LNRSs are to be implemented, monitored and reviewed. There should be a long-term plan for investing in training in ecology and related services. Existing staff including planners will need to be trained in the requirements of LNRS, BNG, and other new duties and processes.
9. The skills and capacity needed by responsible authorities go beyond the ecological and other technical input required to produce a robust LNRS. Lessons learnt from the pilots show that collaboration and stakeholder engagement (see paragraphs 11 onwards below) are resource intensive and require significant input from consultation and communications staff.

10. There is also an important wider training agenda around the creation of green jobs in local economies for nature conservation and restoration. The government's [Ten point plan for a green industrial revolution](#) prioritised the protection of landscapes and the recovery of nature, including the creation of thousands of jobs in conservation and restoration projects to improve biodiversity and help tackle climate change. Funding streams such as the Green Recovery Challenge Fund, and training programmes and green apprenticeships, will need to be aligned with LNRS priorities.

Stakeholder consultation and engagement

11. Comprehensive stakeholder consultation and engagement will be essential to a successful LNRS. The pilots showed that this takes time and resources, it is important that this is recognised and funded by government. It is essential that all relevant partners, organisations and individual stakeholders are properly consulted and engaged in the preparation of LNRSs. Responsible authorities will have an important convenor role. Regulations should set some broad principles and minimum standards for doing this, but not be too prescriptive (question 14).
12. We favour a single but thorough consultation exercise, and would not want regulations to require repeated exercises at different stages in the process of developing the LNRS – this would cause delay and consultation fatigue.
13. This comprehensive engagement process will need facilitating and managing by the responsible authority. We are keen to see collaboration between LNRSs to facilitate the exchange of ideas, good practice, ways of working, data sharing, etc. This too will take time, and the resources to make it happen. In addition to developing the skills and capacity within local authorities, we would expect Natural England to be resourced to provide support, co-ordination and learning (see paragraph 32 below).
14. Key stakeholders include farmers and land owners/managers. The agricultural sector is already dealing with policy and funding changes that will impact on our future environment, these changes should be aligned with the aims of LNRSs. Landowners should not be able to prevent their land being identified as priority areas for nature recovery under a LNRS (question 12), and whilst landowners clearly cannot be forced to change their management methods, it is essential to incentivise nature recovery and measures to enhance biodiversity through complementary agricultural policy and funding.
15. More generally, it is important that consultees – partners, organisations and individuals – do not have a veto over the final proposals and priorities identified in the LNRS. Any challenges should only be on grounds of process rather than content (question 17), so a stakeholder could complain if they could show that they had not had the opportunity to comment on the LNRS, or that the responsible authority had not met minimum requirements as set out in regulations, but could not prevent specific priorities being included in the LNRS. We need to avoid creating a lengthy and expensive disputes procedure.
16. Another key stakeholder group is the public health sector. It is known that access to nature and green space provides important benefits to physical health and mental wellbeing. The Covid pandemic has highlighted growing inequalities in this respect. In identifying priorities for LNRSs local authorities should consider where projects and investment can best be directed to help reduce inequalities in access to nature and green space. We see this as an important element in

‘levelling up’, and an example of how LNRSs with their focus on nature and biodiversity can also help deliver wider objectives.

Data

17. LNRSs will require good ecological and environmental data, and responsible authorities will need to identify any gaps in local information. Conversely, LNRSs should collate and build on existing data from various sources and management plans, rather than duplicate it. Defra will need to consider how to address gaps in national data sets for species and habitats. The first cycle of LNRSs should not be delayed by incomplete data but should identify priorities for improving data in the future if necessary.
18. Data and map formats should wherever possible be consistent across LNRSs to allow them to be scaled up and collated regionally and nationally (question 24). There could be a role for Natural England in developing these formats and providing templates where possible. Minimum standards for data and map formats could be prescribed in regulations and guidance. Support may also be needed for providing public-facing web-based mapping capabilities in a consistent format to facilitate consultation and engagement.
19. Local planning authorities will also require robust data to inform the locality-wide application of BNG from the planning system and to incorporate this into wider LNRSs. It will be a major challenge for the planning system to ensure that BNG calculations are based on good and timely baseline data to achieve positive outcomes for nature, and to ensure that developers are held to account for delivering BNG on site or elsewhere in the local area in a way that is consistent with the LNRS.

Local discretion and learning

20. As with consultation and engagement, it is important that the process and content of LNRSs are not over-prescribed. Regulations should set some broad principles and minimum standards. It is important that there are some high-level principles that apply across all LNRSs, to ensure continuity and integration with national policies and targets. Responsible authorities will need good advice and support from Defra and Natural England in this respect.
21. Beyond that, responsible authorities will be keen to involve key local partners in the development and delivery of the LNRS so that they are embedded and owned. Places will have different contexts, challenges and opportunities that should be reflected in LNRSs without being constrained by regulations. Some useful lessons have been learned from the pilots, but the first cycle of LNRSs will inevitably throw up further lessons and the learning from these will need to be captured and shared.

Funding

22. LNRSs must not just be technically robust documents but be realistic and deliverable plans for action. Local authorities must be adequately resourced and supported over the long term to ensure the successful preparation and delivery of LNRSs. This issue was specifically highlighted by the ‘Lessons learned’ report on the pilots. At the time of writing, it is not known whether the recent Spending Review delivers on the commitment to fund the new burdens in full. Wildlife and Countryside Link [estimate the additional resources required](#) in local authorities and Natural England to be in the order of £38m in the first year and £16.5m annual ongoing costs.

23. ADEPT has argued consistently that funding for locally-led initiatives needs to be simple, integrated, and long-term. Too often funding for nature's recovery and access to green space is made available in short-term competitive pots of money, with short application and delivery timeframes. That makes it difficult for local authorities to take the long-term strategic approach which is essential for effectiveness, and not all local authorities will be successful in their bids. We welcome recent general indications from government, such as in the recent Net Zero Strategy, that longer term and more co-ordinated funding streams can improve innovation, efficiency and outcomes.

Policy alignment

24. Nationally, the successful delivery of LNRSs will require government to align the various policies and funding streams that relate to nature and the environment, including planning reform, agriculture policy, protected landscapes, and climate change mitigation and adaptation.

25. The forthcoming Planning Bill is an opportunity to ensure that the planning system supports LNRSs. A strengthened focus on protecting and restoring nature in the planning system is needed to ensure that Local Plans reflect and are fully aligned with LNRSs. Development decisions must be consistent with the aims of LNRSs – all development should be required to contribute to nature's overall recovery. This is at the heart of BNG, and it is vital that development does not damage nature in one place without a clear commitment to protect and improve nature elsewhere in line with the LNRS.

26. Agriculture policy and the Food Strategy are also key to nature protection and recovery. Farmers and landowners will need to be sufficiently supported and incentivised to manage land in ways that protect and enhance the natural environment. There needs to be a shift in agriculture towards nature-friendly farming techniques, underpinned by funding streams and investment in innovation. The government's actions in response to the independent review of protected landscapes (Glover Review) should also align with the aims of LNRSs. It was encouraging to see in the initial [Ministerial written statement](#) a commitment to directing more funding towards making space for nature and supporting nature's recovery in our protected landscapes, and specifically referencing LNRSs.

27. A properly joined-up approach to tackling the nature and climate emergencies and the levelling up agenda is needed in government. Levelling up is three dimensional – economic, social and environmental – and so includes nature conservation and restoration, as well as improving access to green space for those people who are disadvantaged. The new Net Zero Strategy recognises the need to integrate cross-departmental policy and to improve co-ordination and engagement with local government.

Governance

28. We welcome the recognition of the importance of a place-based approach and local authorities in the development and delivery of LNRSs as a vital element in nature conservation and restoration. It is right that the LNRS lead role as responsible authority is placed at the strategic level of local government – unitary and combined authorities, and county councils. In places where there is a mixed landscape of county, unitary and combined authorities there should be consultation with them to help determine where the responsible authority role should sit.

29. 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 8). Neighbouring responsible authorities should be required to work together and share information and their draft priorities, as effective strategies and actions will cross boundaries (question 10). There will be a particular challenge for bodies such as National Parks and Areas of Outstanding Natural Beauty which may span a number of responsible authorities and will need to engage with developing multiple LNRs and helping to ensure their coherence across administrative boundaries.

30. Locally, the successful delivery of LNRs will require responsible authorities to align their LNRs with other key local strategies (including those for transport, local enterprise, public health, and tackling the climate emergency), and with neighbouring LNRs. In particular, we want to emphasise the need to align with local climate action plans – we are in the middle of nature and climate emergencies, one cannot be solved without the other, and LNRs must identify opportunities for mitigation (e.g. carbon sequestration) and adaptation. We are ambitious for LNRs to become an essential part of wider, co-ordinated place-based strategies that can be a driver for additional local powers and resources as the government develops its proposals for further devolution and county deals.
31. Responsible authorities alone should sign off their LNRs, there should be no requirement for sign off by other councils or partners (questions 19, 20). 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.
32. Natural England will play a vital part in the success of LNRs and will have a number of other roles. These will include advising and supporting responsible authorities through sharing feedback and best practice, providing standard templates and software so that data and maps are consistent, and advising on other relevant plans and strategies that each LNR should take into account. They should advise on national priorities to be reflected, and review relevant academic and scientific publications to help keep local planners and practitioners up to date. They should also advise responsible authorities on the various funding streams and opportunities (including private finance) available to support the delivery of LNRs, and advise government where funding streams can be aligned and simplified.

Conclusion

33. We strongly support the forthcoming statutory LNRs to provide comprehensive place-based strategies that will establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits. We welcome the chance to respond to this consultation, and look forward to continuing to work informally with Defra and Natural England officials to help to develop LNR regulations and guidance, and to provide opportunities to test them on the ground.