

Appendix 1: CDC comments on the draft LNRS consultation and LNRS response

Species Priorities List

This is a very comprehensive list of species which has been appropriately prioritised. It could be helpful if the species list and actions clearly referenced the Statement of Biodiversity Priorities, unless there are plans for the documents to be integrated in the future. The proposed actions for species on this list could be referenced within the proposed measures of the Statement of Biodiversity Priorities. Alternatively, the species lists actions could have the relevant codes for habitat actions referenced. In this way complementary species-specific actions could be nested within the broader proposed measures for habitats which would help stakeholders see what further actions they can take for species within their habitat proposals.

LNRS response: Many thanks, nesting was discussed but found to be too challenging as some species require a range of particular habitats including multiple habitat types. However, we have improved the references to the various LNRS documents to enable people to see that the Species list is one of the LNRS documents and that there are others which require consideration.

Statement of Biodiversity Priorities

We have no suggested additions or omissions from this list of Priorities. The Biodiversity Priorities and the Potential measures swap between the use of tenses. Some are written as a vision e.g. 'there are more areas of scrub', and some as an action 'create or restore areas of lowland heath' which appears confused. Wording them all consistently as an action or goal to be achieved would make it clearer for the wide variety of groups who may refer to the Strategy. Potential measures which are not mapped on the habitat map might benefit from inclusion of an additional column stating more generally the type of areas/habitats where these actions could be carried out and what land management systems it is compatible with. This is particularly relevant for creation of new habitat types. Website links from the proposed measures column currently lead to a variety of information sources and organisations. We would seek assurance of the stability and verification of these links or whether the LNRS will look to reference its own sources of guidance in the future.

LNRS response: Many thanks, the tenses and language in the priorities and measures was improved to enhance the consistency in this document. The non-mapped 'countywide' measures each fall under their appropriate habitat type in a table. At this point it was not felt to be appropriate to note down all the habitat types that could be converted through creation measures because the possible lists become very long and could further lengthen the documents. However this could be investigated in the deliver phase of the LNRS. Also during the delivery stage, the LNRS would undertake regular checking and updating of the links provided within the strategy.

Description of strategy area

This is a very comprehensive and readable description of the Strategy Area. This is however a lengthy document and its usability for those organisations who will refer to

the strategy could be aided by an opening set of overarching principles or aims within the executive summary or early in the document layout.

It would be helpful to have inclusion of information on how the LNRS will interact with Oxfordshire's current Conservation Target Areas. CTAs have a similar premise to the LNRS – areas where proposed measures can be taken for a specified goal – and it is important to make it clear to landowners, charities, Local Authorities and other organisations why these areas differ and how they relate to each other. In addition, mention could be made of the draft Nature Recovery Network mapping previously carried out within Oxfordshire and how this will be referred to once the LNRS is published.

An illustrative map of the strategy area within this document would help understanding of the LNRS's purpose.

LNRS response: Many thanks, the length of the document was reduced by half with the more detailed sections about National Character Areas and the Rivers and their Catchments being separated into appendices for those who have particular interest in those sections. Additionally, overarching principles and a vision have been added. A page on the Conservation Target Areas and the draft Nature Recovery Network were also added, showing how the LNRS represents an evolution, building on these previous pieces of work. A page was added stating how this LNRS differs from previous strategies (the CTAs and the draft NRN). How they will interact with the LNRS is a question that we are asking of the CTA leads and friends and this is being actively discussed in local meetings. An illustration of the mapped strategy areas was added to the document to help visualise this.

Anything else?

Thank you for the opportunity to comment on the Draft Local Nature Recovery Strategy. Firstly, we welcome this draft of the LNRS and commend the work and level of engagement that has gone into the production of both the draft documents and draft habitat map. Cherwell DC is a supporting authority for this project and has fully engaged with the development of the draft strategy particularly through the officer working group.

Our comments, which we hope you will find helpful, have been prepared at officer level in consultation with our relevant Portfolio holder. We look forward to the opportunity to address these points together as the LNRS is finalised. The draft map, with the ability to comment on and add specific action points during the consultation period is considered fit for this purpose. However, in its final form the areas mapped as hexagonal points without meaningful boundaries, could complicate reference to the LNRS for Planning Policy and Development Management. This is particularly regarding its role in biodiversity net gain assessments for 'strategic significance', encouraging biodiversity gain sites within the Strategy area and setting specific net gain requirements. The final map would benefit from having ecologically coherent and robust boundaries. For example, mapped areas to the boundary of fields or following landscape features - whilst making it clear that actions can be taken outside these areas. The Habitat map does not currently embrace the Conservation Target Area boundaries in their entirety. We would hope to see these included to support the nature recovery work within these areas to date and ongoing. Alternatively clear guidance should be included within the strategy about how these areas should be considered in tandem with the LNRS. In addition, whilst the majority of District Wildlife Sites (DWS) are covered within the mapped Strategy area, we consider the Oxfordshire Wildlife Site Project to include both LWS and DWS and would therefore support inclusion of all DWSs as areas of potential value for biodiversity, which recognise access and involvement of the community.

LNRS response: Many thanks for the support and dedication to the LNRS shown by officers at Cherwell District Council. We truly appreciate the support and engagement you have shown throughout the preparation of this strategy, and we look forward to working closely with you during the delivery phase to create tangible evidence of nature recovery in Oxfordshire.

The LNRSs were extended out so that the mapped 'areas that could become important for biodiversity' included as much of the CTA areas that were suitable for mapping habitat actions (i.e. all the land but not all the private gardens in towns within the CTA areas).

Not all of the district wildlife sites have been mapped. This is due to the nature of prioritisation that the LNRS has been tasked to do. Not all of the areas requested by all authorities, local partners, or local people could be added otherwise the mapped locations would not represent a prioritised network of nature in Oxfordshire. However this should not be interpreted as ignorance of those areas, they are important space in Oxfordshire, as are many of the other places that were requested for addition by other parties. The LNRS does not intend to prevent work happening in those locations. Instead it is by nature of the prioritisation process that not all sites have been possible to include. However, please note that the LNRS will be required, in future to map out where actions have been taken to recover nature in Oxfordshire and these locations and places are expected to influence future mapping when the LNRS is reviewed and republished in 3-10 years time.

We understand that there are concerns that LNRSs do not typically map to field boundaries. However, the LNRSs are designed to map opportunities for nature recovery work and this includes working across boundaries. A number of LNRSs across England have used different types of fuzzy boundaries and ours has used hexagons. The purpose of this is to encourage neighbouring landowners to work together where possible and to encourage opportunities for landowners who are close to the network.

*The **main purpose** of the LNRS map is to represent spatially the locations where the creation and/or enhancement of certain habitats would provide the greatest benefit for nature and the wider environment, including reconnecting habitats as part of the network. However, this does not mean that landowners and managers will be required to implement any of these measures. Instead, the Government is encouraging the delivery of targeted actions for nature recovery as opportunities for funding and investment arise. The LNRS itself does not preclude or prevent development or any other type of land use.*

*The map offers high-level recommendations based on a range of the best and latest data available including soil data. However, to ensure the right habitat is created in the right place, all locations still **need to be sense-checked in-person**, on the ground with the relevant professionals to ensure that your actions are suitable for the current conditions on the site i.e. soil tests, surveys of existing habitats or species, topography, hydrology, and any sites that have special designations or features that may require special consideration (e.g. heritage features). Land manager preference is also a factor, some sites may be best for one measure over another based on the current land-use or site assessments and some sites may be suitable for multiple, complementary measures that could be delivered within the same location.*