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Sent by email to: localnaturerecoverystrategies@defra.gov.uk

28 October 2021

Dear Sir/Madam,

RE: Response to the consultation on Local Nature Recovery Strategies

Anglian Water has ambitious plans to be at the forefront of tackling the climate and ecological emergency. This is especially important given the unique local topography of our region and the water scarcity, flood risk and growth challenges we face. This is reflected in our purpose as a water company, enshrined in our Articles of Association, to *'bring environmental and social prosperity in the region we serve through our commitment to Love Every Drop'*. Local Nature Recovery Strategies (LNRS) have the potential to play a critical role in identifying local priorities, opportunities and the specific actions needed to aid nature's recovery in the Anglian Water region.

We have outlined our position in our full consultation response, but we also want to highlight a few specific areas which we believe are key to maximise the positive impact of LNRSs and the value they achieve.

The most important of these is that Local Nature Recovery Strategies should not only consider habitats and biodiversity but also the potential for carbon sequestration in the landscape and improved water and flood risk management. As closely related and mutually beneficial, LNRSs should 'solve' for nature, carbon and water together. This would promote approaches in LNRSs that deliver multiple co-benefits such as riparian tree and hedgerow planting, natural flood management, more wetlands and inter-tidal habitat, floodplain reconnection, and peatland restoration.

In terms of ownership and delivery of LNRSs:

- **Both the geographic scale of LNRSs and democratic accountability for them is important.** We believe combined authorities, and county and unitary authorities elsewhere, are the most appropriate body to lead their development in close cooperation with relevant national and local authorities and other stakeholders including water companies. There should also be a duty to cooperate on the development of LNRS between adjacent authority areas so that they are consistent and coherent at a wider spatial scale.
- **To support this, government should specify data outputs, standards and formats for the digital mapping and spatial layers**



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produced as part of developing LNRSs. This will allow individual LNRS outputs to be stitched together and viewed on a single England-wide GIS platform. We believe that this is key to ensure that there is joined up thinking when it comes to nature corridors and linear features such as rivers that cross boundaries. We would also like to see the data freely available and downloadable to all to ensure maximum use of the data. **We would also like to see the LNRS, and its consultation, be a mandatory evidence document for Local Plan preparation.** LNRS should have legal status under the National Planning Policy Framework, and planning authorities must treat them as a material consideration in the Local Plan development process. It is critical that the Local Plans and LNRS work seamlessly together, reinforcing each other's objectives rather than potentially be in conflict.

We have submitted our response in full via the online form, and you can also find it in the annex of this letter.

Thank you for the opportunity to comment on this important consultation. If you would like to discuss our response in detail please do not hesitate to contact me.

Yours faithfully,

Chris Gerrard CEnv
Catchment and Biodiversity Manager

Email: cgerrard2@anglianwater.co.uk

Annex

LNRS Consultation Response - also submitted via the online form.

5. Which of the groups listed below do you consider essential for the preparation of a Local Nature Recovery Strategies? **All groups ticked as strategies needs a strong mandate across public, private and voluntary sector.**

6. Are there any organisations not listed above whose involvement you consider essential? [Yes/No/Don't Know] If yes, which ones and why? [Free text box]

IFCAs, MMO and relevant marine/coastal partnerships, also national taxon NGOs (BTO, BSBI, Butterfly Conservation) that can flag species-specific considerations for a local area.

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/No/Don't know]

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/No/Don't know]

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? [Yes/No/Don't Know] If yes, what information should be included? [Free text box]

In the early stages of developing LNRs, all stakeholders should be asked to provide information that may be relevant to the strategy's preparation. This will include the private sector, including infrastructure providers as well as others such as academic institutions.

At Anglian Water, we have undertaken a detailed assessment of our land holdings and prioritised them for their biodiversity value, and it's likely that other infrastructure providers will have similar assessments. This data will support plan creation but also identify opportunities for collaboration at scale, based on existing action and ambition.

The current review of NPS policy could also put in place policy support for infrastructure projects to look beyond the redline boundary of applications in order to contribute to nature recovery at scale.

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

- Required to inform neighbouring responsible authorities of their progress in preparing their Strategy
- Required to give information to neighbouring responsible authorities that would help them prepare their Strategy
- **Required to collaborate when setting objectives for areas close to boundaries**

- Left to local discretion
- Other [If other, please specify]
- Don't know

11. Should draft Local Nature Recovery Strategies be subject to a local public consultation prior to publication? [Yes/No/Don't know]

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? [Yes/No/Don't know]

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/No/Don't know]

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 only
- Setting broad principles and specific requirements on who to engage or how
- A standardised process of who to engage and how t
- Don't know [Tick one]

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/No/Don't know]

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
- Other [please specify] Government, if a plan fails to meet minimum statutory requirements and/or is not ambitious enough to allow national targets to be met.
- Don't know [Tick all that apply]

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

- Not adequately involving relevant specific groups
- Slow/no progress
- Lack of transparency
- Legal requirements not being followed

- Other [please specify] **Dispute based on lack of robust and objective process. Inconsistent/incoherent plans across adjacent authority areas. If taking LNRs together they will fail to achieve legally binding national targets.**

- Don't know [Tick all that apply]

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?

- Before finalisation of the Strategy priorities

- **Before a potential public consultation on the draft Strategy**

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

- At any time

- There should not be a process for external consideration

- Other [please specify]

- Don't know [Tick all that apply]

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?

- **No**

- Yes – instead of a mechanism for resolving disputes in the preparation process

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

- Don't know [Tick one]

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

- Other Local Authorities in the Strategy area

- Natural England

- Other [please specify]

- Don't know [Tick all that apply]

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

- Disagreement about overall priorities

- Disagreement about specific priorities

- Disagreement about potential measures

- Disagreement about the inclusion or exclusion of specific "areas of potential importance"

- On any reasonable grounds

- Only the "responsible authority" should be required to sign-off the Strategy

- Other [please specify]

- Don't know [Tick all that apply]

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?

- It should not be possible for a separate body to be appointed
- **Natural England**
- Planning inspectorate
- Whichever body the Secretary of State considers appropriate
- The responsible authority for a different Local Nature Recovery Strategy
- Other [please specify]
- Don't know

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 particular 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.
- Something else [please specify]
- Don't know [Tick all that apply]

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/No/Don't Know]

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

- **Advice from Natural England**
- **Creation of standard templates**
- **Specified in statutory guidance made under clause 101**
- By consensus amongst responsible authorities
- Other [please specify] **Mapping should adhere to data standards and standardised formats for digital mapping outputs such as spatial layers, attribute data and metadata. For example, the new mapping styles for UKHab could be adopted as standard for LNRs, which will make them consistent with how development and Biodiversity Net Gain sites should be assessed.**
- Don't know [Tick all that apply]

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

- **The format should be the same**

- There should be some specific requirements but the responsible authority should keep some discretion over presentation
- The responsible authority should be able to decide how they present their Strategy so long as it meets legal requirements
- Don't know [Tick one]

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/No/Don't know]

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's part of a scheduled review process
- Don't know [Tick one]

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
- **Decided locally**
- Don't know [Tick one]

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** - in step and Ahead of LP production
- A maximum period of time between reviews should be set
- A minimum period of time between reviews should be set
- A maximum and a minimum period of time between reviews should be set
- The Defra Secretary of State should be able to decide
- Don't know [Tick one]

31. Do you think that all responsible authorities should take a consistent approach to describing the biodiversity in their Strategy area? [Yes/No/Don't know]

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

- No preference
- Responsible authorities should be able to decide
- National Character Areas
- **River catchments**

- Other [please specify]
- Don't know [Tick all that apply]

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?

- Climate change scenarios
- Current land use and land cover types using standardised categories
- Legal designations
- How land use/ habitat distribution has changed over time
- 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)
- Opportunity areas for nature restoration
- Other [please specify] Long-term water resources planning, to take account of the impacts of planned water resources investment. This includes new sources of water such as reservoirs that could become significant biodiversity assets.
- Don't know [Tick all that apply]

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

- Identify particular rarer habitats/species that the strategy area is suitable for supporting
- Assess the potential to contribute to national priorities for nature recovery
- Describe the relative opportunity for creating more areas of key habitats as well as making them bigger, better and joined up
- Indicate broad areas where creating improving habitat may be more achievable
- Assess the potential for use of nature-based solutions
- However the responsible authority finds most useful
- Other [please specify] The statement should describe opportunities for nature-based solutions to address specific problems within the plan area, such as flood risk or public access to green space. In doing so it will pave the way for an Environmental Net Gain approach as per the 25YEP.
- Don't know [Tick all that apply]

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?

- All Strategies should follow the same priority setting process

- Strategies should follow the same high-level principles but with local discretion
- Strategies should decide for themselves how to prioritise
- Don't know [Tick one]

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

- National priorities should be advisory
- Responsible authorities should show how they have considered national priorities
- Local priorities should follow a consistent nationally-set structure
- Other [please specify]
- Don't know [Tick one]

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 only priorities
- List priorities and other relevant lower priority outcomes
- Don't know [Tick one]

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

- Considered and prioritised alongside other outcomes
- Incorporated directly
- Don't know [Tick one]

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
- No, only those that can be mapped
- Don't know [Tick one]

40. Should there be a standard list of potential measures for responsible authorities to choose from? • No – responsible authorities should have free choice

- There should be a list of suggestions
- There should be a core list which the responsible authority can add to
- Responsible authorities should only be able to choose measures included on a national list

- Don't know [Tick one]

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
- Any areas the responsible authority chooses
- None
- Other [please specify]

LNRs should take an Environmental Net Gain approach to 'solve' for nature, carbon and water together. This would promote options such as peatland restoration, wetland creation, tree and hedgerow planting, floodplain reconnection, riparian buffer strips and cover crops, inter-tidal habitat, seagrass restoration etc.

- Don't know [Tick all that apply]

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/No/Don't know]

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?

- Yes, there should be a set percentage each responsible authority should identify
- No, this should not be set and decided locally
- Don't know [Tick one]

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/No/Don't know]

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.

- Very satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dis-satisfied
- Very dissatisfied
- Don't know

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

Q10

There should be a duty to cooperate on the development of LNRSs between adjacent authority areas. Also, government should specify data outputs, standards and formats for the digital mapping and spatial layers produced as part of developing LNRSs. This will allow individual LNRS outputs to be stitched together and viewed on a single national GIS platform (that the government should also specify) available online so that coherence between adjacent plan areas can be checked and improved at key stages in the LNRS development process.

Key thing to ensure is there is joined up thinking when it comes to nature corridors, linear features such as rivers. Groups like Water Resources East and Natural Capital East role may help ensure coherence across wider spatial scales.

Is it worth highlighting as a related point the water industry (and probably other infrastructure providers) concerns in relation to delivering cross-boundary schemes where the best outcome for biodiversity may mean that losses and gains are not distributed evenly across local authority areas and that LNRS should champion this.

Q11

LNS & its consultation should be a mandatory evidence document for Local Plan preparation. LNRSs should have legal status under the National Planning Policy Framework, and planning authorities must treat them as a material consideration in the Local Plan development process. We need to make sure that the Local Plans and LNRS work seamlessly together, reinforcing each others' objectives, rather than being in conflict or undermining each other.

There should be a list of statutory consultees for LNRS, including:

- Key agencies such as the Environment Agency and Natural England, and the Forestry Commission.
- District authorities in two-tier areas, if the LNRS is led by a county council.
- The relevant water companies, and water and sewerage companies serving the area in question.
- The lead authorities developing the LNRSs in adjacent areas.

Q12

It is important for all opportunities for nature recovery are explored, even if the current landowner and the present time is not supportive of different land use approaches. Ownership and management of land, and the incentives for changing land uses, will change and attitudes may change too. We need to minimise the amount of 'blank' space in the LNRSs, and understand the true potential for environmental improvement.

But there does need to be reassurance and clarity to everyone about what the implications of having areas included within, or outwith, an LNRS.

Q26

We're going to have to collate info about priorities across boundaries so the more consistently they are defined, formatted and presented the better

Q27

Not only should the plans (as documents) be published together on a single national website, the spatial information underpinning and presented within the plans should be stitched together into a single national map on a common GIS platform. This would allow coherence between plans at a wider spatial scale to be understood, and allow easy understanding and interrogation of priorities and plans. To achieve this the lead authorities will need to be given data standards and standardised formats for digital mapping outputs such as spatial layers, standardised metadata for shape files etc.

Data should be freely downloadable by anyone. An Anglian Water we will want to import LNRs mapping data for our whole region into our corporate GIS in order to help us fully play our part in achieving the aims of LNRs

Q38

The scope of Local Nature Recovery Strategies should not only be nature and biodiversity improvement, but also to maximise opportunities for carbon sequestration and to tackle water and flood risk challenges in the context of climate change. Making sure LNRSs 'solve' for water, carbon and nature together rather than nature alone will promote options and land uses that deliver multiple objectives at the same, as follows:

- carbon sequestration: as a contribution toward five-yearly carbon budgets and the 2050 net zero target. This would put a particular emphasis on options such as increasing tree cover and restoring hedgerows, wetland creation, peatland and soil restoration, seagrass planting and new inter-tidal habitat.
- water and flood risk management: to support achieving Water Framework Directive targets for good ecological health and to reduce the risk of flooding within both rural and urban catchments. This would promote riparian tree planting, buffer strips, wildflower meadows and cover crops, plus natural flood management options, new water storage, floodplain reconnection, peatland restoration, and wider catchment management approaches.

Q43

The question is badly formulated. The answer should be No – responsible authorities can decide what proportion of their area could become of importance for biodiversity. But NE should provide a strong strategic steer if not raise a dispute if a LNRS is not contributing as it could toward the '30% of land for nature by 2030' goal and the 'State of Nature' target for 2030 to be set under the Environment Bill. When taken together, LNRSs must be sufficiently ambitious to meet these goals.