



MAYORAL COMBINED AUTHORITY AND NORTH SOMERSET NATURE RECOVERY STRATEGY

Response to the Public Consultation

Introduction

The Local Nature Recovery Strategy

The Local Nature Recovery Strategy (LNRS) agrees local priorities for nature recovery, propose actions to deliver those priorities, and maps 'focus areas' where action to help nature will have the biggest impact. It acts as the Local Nature Recovery Strategy for the Mayoral Combined Authority, as well as for North Somerset.

The Mayoral Combined Authority has worked with other organisations and partners in the area to agree what should be included in the consultation draft of the Local Nature Recovery Strategy. Priorities and potential measures were developed with the input of people who know and understand the area, including landowners and managers. This approach was essential to ensuring the proposed measures are ambitious and feasible.

The content of the Strategy that was consulted on can still be viewed on the Consultation Website ([link](#)).

As well as having a role in the planning system and directing public funding for nature recovery, the Strategy will inform the delivery of 'nature-based solutions' for outcomes such as flood management, carbon sequestration and improvements in water quality.

For more information on the role of LNRSs, please refer to the [Government's policy paper on Local Nature Recovery Strategies](#).

Why were we consulting?

The Public Consultation was held to provide residents and stakeholders across the West of England Mayoral Combined Authority the opportunity to provide their thoughts on the draft Local Nature Recovery Strategy. This will help ensure that the Strategy best reflects local opportunities, concerns and priorities.

The Consultation also fulfils the statutory duty for a responsible authority to consult on its local nature recovery strategy (The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023).

Structure of the Consultation

The Consultation comprised three principal ways of providing feedback:

- Via an online survey, which asked consultees for their feedback on the priorities, mapping, and structure of the Strategy;
- Via an 'Interactive Map', on which consultees could comment on a specific location and on the priorities and measures for each 'sub-area'; and
- Via email, for more detailed responses.

7,712 different people visited the Consultation Website, and we received 496 responses of some description from 329 people.

The majority (370, or 64%) of the consultation responses were 'place-based' comments on the Interactive Map; ~319 were in the MCA, ~47 of these were in North Somerset, and 4 were outside of either area. 73 people responded to the survey, and a smaller number of comments were received on various 'sub-areas'.

How we analysed responses

We read each directly received response, survey response and the comment on the Interactive Map, and categorised the responses according to whether their suggestions were within the remit of the LNRS to address (see '**Remit of a Local Nature Recovery Strategy**').

We drew out themes from the responses to ascertain common suggestions and issues, which have been used to inform the response below. We have endeavoured to provide a response to the majority of the commonly-raised suggestions and concerns, and we have considered every suggestion made through the consultation.

We considered each comment on the Interactive Map that proposed mapping additional areas as 'focus areas for nature recovery' individually, and analysed whether the proposed area should be mapped following the same logic as for the rest of the mapping.

We have followed up some responses with the respondent to obtain further detail, particularly those that were more detailed or where further clarification was needed.

Our Response to the Consultation

Remit of a Local Nature Recovery Strategy

The purpose of a LNRS is 'to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment'¹. There is no requirement that any proposed measure must be carried out; they are intended to help public, private and voluntary sectors focus their nature recovery efforts for greater collective impact².

The LNRS can propose measures for e.g. the creation and enhancement of habitat, or measures that would reduce pollution, but it is not an 'action plan' for any organisations. Suggesting detailed proposals for a specific organisation, such as land purchase is, therefore, not within the scope of the LNRS.

The LNRS is primarily focused on measures that can deliver nature recovery, although wider co-benefits are considered where they can be delivered alongside nature recovery (including 'nature-based solutions'). Measures that will not directly contribute towards nature recovery, such as cycling and walking infrastructure, are not within the remit of the LNRS.

Additionally, measures related to research and monitoring, while important, do not *directly* deliver nature recovery and have, therefore, not been considered within the LNRS.

With regards to planning, the Levelling Up and Regeneration Act states that Local Plans must 'take account of' any relevant LNRS³. However, it is not within the remit of the LNRS to establish where development can and cannot take place, as there will be many other factors to consider when making this decision; this is the remit of a Local Plan.

¹ DEFRA (2023), Local nature recovery strategy statutory guidance

² <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>

Priorities and measures for nature recovery

Priorities and measures within the scope of the LNRS

The responses indicated that the priorities and measures were broadly correct, with some additional measures proposed to strengthen the LNRS. The updated version of the LNRS will account for these suggestions by including a small number of additional measures and adjustments to existing measures to account for the feedback received.

The proposed measures to be included based on feedback from the consultation are:

- Where rhynes/ditches are maintained for drainage, reprofile rhynes/ditches with steep banks to a shallower gradient. This should create a variety of water depths in the channel and with varying profiles (largely between 30 and 45 degrees) along the length of the ditch.
- Conserve the unique species-rich grasslands that exist on old coal 'batches' (spoil heaps) in the Somer Valley, including preventing scrub encroachment.
- Consider the introduction of South American weevils to provide control of Pennywort where it is a persistent problem.
- Revert maize crops to grassland with low fertiliser input. This will reduce pollution and soil run-off, as well as improve the land's value to wildlife.
- Where feasible, create new large multifunctional parks and green spaces, prioritising areas with least local access, highest vulnerability to the urban heat island effect and air pollution, and/or where significant housing development is expected.
- Create greenways along rivers in cities to improve people's access to rivers and provide nature-rich corridors.

In response to the consultation, other measures were adjusted to:

- Reducing the number of woodland management measures by combining four previous measures into one.
- Include references to a broader range of actions that could make woodlands resilient in the face of climate change.
- Make ponds and other wetland habitats more prominent away from coastal areas.
- Provide more detail on the management of species-rich grasslands.
- Provide more explicit references to where permission would be needed to implement certain measures (such as floodplain reconnection).

We did not include a measure for the 'creation of productive mixed woodlands that align with current standards for sustainable forestry', as the primary driver for this action would be productive forestry rather than nature recovery.

With regards to the suggestion for 'dense plantations on slopes to deal with flood management issues', this is covered by the measure 'Cross-slope (following a contour) planting of trees/woodland and hedgerows to intercept flows of water, providing natural flood management and capturing pollutant run-off', the guidance for which specifies preferred planting densities for flood management.

Priorities and measures outside of the scope of the LNRS

Some of the proposals for additional priorities and measures for nature recovery were outside of the primary remit of the LNRS, which is on nature recovery (i.e. restoring ecosystems and reversing the decline in wildlife).

For example, surveying and monitoring of wildlife, accessibility of green spaces, cycling and walking infrastructure, and the provision of public rights of way are all measures that would not directly contribute to nature recovery and, therefore, have not been included as priorities/measures. This is not to say that they are not important measures, but that there are other strategies and action plans where they would be more appropriately placed.

Additionally, proposed measures such as purchasing of land are also not within the remit of the LNRS, as it is not an action plan for the Responsible Authority or Local Authorities.

We will endeavour to ensure that the final version of the LNRS is clear regarding the remit of the Strategy, to better explain the types of measures that have and have not been able to be included.

The LNRS is also not able to dictate where development can or cannot take place, which is the remit of Local Plans. We have, however, included priorities and measures related to ensuring that any development is nature-rich and contributes positively towards ecological network, to the benefit of wildlife and people. The Government's Levelling Up and Regeneration Bill (2023) also requires that all tiers of planning to 'take account of' the relevant LNRS³.

Presentation of priorities and measures

Structure of Priorities and Measures

The responses to the consultation indicated that the LNRS could be made more user-friendly, as some people found that the number of measures proposed for a given area made it difficult to ascertain what would be the best thing to do to help nature.

The final version of the LNRS will be hosted on an online application that will enable filtering of measures by 'type' and 'stakeholder'. This will mean, for example, that a farmer or landowner interested in habitat creation could apply the categories 'habitat creation' and 'farmers and landowners' and only view the measures that are relevant to them. This will reduce the total number of measures shown to each user, while retaining a variety of measures that are relevant to different users.

We have also taken on board the feedback that some areas have too many measures by:

- Splitting some 'sub-areas' into smaller areas, to make the potential measures more specific; and
- Reducing the number of measures recommended in some sub-areas to focus on those that will have the greatest impact for nature.

We are also in the process of user-testing the LNRS application to ensure it is designed in a way that accounts for the needs of various user groups.

³ Levelling-up and Regeneration Act 2023

The application will be the primary tool for users of the LNRS, to make it clearer to people what they should be using to identify local measures for nature recovery. Other documents will be published as supporting documents for those who would like further detail on background and how the LNRS was produced.

Narratives for sub-areas

As most users found the narratives helpful in explaining what is needed for nature recovery locally, and why it is important, we will adjust these to be clearer on what a 'vision for nature recovery' could look like for each sub-area.

We do not think it would be feasible to set targets for nature recovery in each sub-area; national guidance does not make clear that this would be appropriate, and at this stage it would be difficult to develop targets that would be sufficiently accurate for all sub-areas.

Urban categories

The final version of the LNRS will integrate the categories used to organise measures in urban areas into a wider categorisation of measures, which can be used as a filter to find measures that are most relevant for a given user.

We expect this will make their purpose clearer and the categorisation easier to use, as those that did get to grips with the categorisation found it helpful.

Mapping of measures and 'focus areas for nature recovery'

Mapping of focus areas

There were many suggestions for additional areas to be mapped as focus areas for nature recovery; the vast majority of these were made using the Interactive Map.

We have updated the mapping of focus areas for nature recovery, and the related mapping of measures, to account for these suggestions. Not all of the suggestions were able to be mapped, as we needed to ensure we were using a consistent approach to decide whether an area should be mapped as a focus area for nature recovery.

In particular, some sites that are not deemed strategically important for nature recovery (due to, for instance, their relative isolation from other nature-rich sites) were not included in the updated mapping.

It is important to reiterate that an area not being mapped as a focus area does not mean it would not benefit from or would not be appropriate for action for nature recovery.

The consultation was particularly helpful in identifying additional sites that are managed by local groups for nature, particularly in urban areas and near other settlements. Many of these have been mapped as focus areas for nature recovery to reflect their importance as sites managed for nature.

Following a suggestion from Avon Wildlife Trust, we will extend mapping of riparian buffers higher into the upper catchments; the only reason for not having done so previously was due to a lack of data on where these smaller tributaries were located.

A couple of respondents asked why focus areas for saltmarsh restoration were smaller than those identified within the MMO saltmarsh potential map. This is because the areas mapped

through the MMO mapping may not align with [Shoreline Management Plans](#) (SMPs), which set out a planned approach to managing flood and coastal erosion risk. Where the relevant SMP shows managed realignment as the preferred approach, the location of future flood defences (and, therefore, the potential locations for managed realignment) is dependent on further modelling by the Environment Agency. This modelling has not been conducted at the time of writing, and so we have not been able to map all possibilities for managed realignment that may exist in the future.

With regards to responses requesting sites being mapped as focus areas for nature recovery to prevent development, it is not within the remit of the LNRS to make decisions on where development should or should not take place; this is the role of the relevant Local Plan.

It should also be reiterated that mapping an area as a 'focus area for nature recovery' will not afford protection from development.

'Areas that are already of importance to biodiversity'

By regulation, we are restricted to mapping nationally-designated sites (SSSIs, SACs and SPAs), Local Wildlife Sites, Local Nature Reserves and irreplaceable habitat as 'areas that are already of importance to biodiversity'. This means that other sites cannot be mapped as being 'already of importance to biodiversity' in the LNRS.

We are also unable to designate new areas as Local Wildlife Sites or Local Nature Reserves through the LNRS process.

However, we do intend to highlight where other habitats are located in the Application that will host the LNRS, so that users can understand where other areas of value to wildlife may be located.

There were a number of responses highlighting that some sites in Bristol should have been mapped as 'areas already of importance' due to their designation of SNCIs, in particular Northern Slopes and Novers Hill. Following further information from Bristol City Council clarifying that these sites remain designated as SNCIs, we have updated the mapping of as 'areas already of importance to biodiversity' to reflect these designations.

Priority Species

The Priority Species in the LNRS were primarily intended to focus on species:

- For which the MCA and/or North Somerset is a particular stronghold, or are endemic to the region (they only exist in the region);
- That are threatened or vulnerable according to IUCN criteria or national 'red lists'
- That need specific action in addition to wider habitat creation or enhancement, such as the building of swift boxes to help swifts; and/or
- Are particularly engaging for users of the LNRS.

These criteria explain why some common species that have suffered declines were not included. For example, brown hares have suffered significant declines and are engaging, but they will benefit from a wide array of measures for habitat creation and enhancement, and the West of England is not a stronghold for the species.

There were a number of suggestions for species that could be included using these criteria, particularly for some taxa (e.g. fungi) for which we previously lacked good data.

The feedback also suggested that it would be helpful to make a clearer link between measures and the species that they would benefit.

Therefore, we have expanded the list of species and focusing on drawing links between measures and species, rather than just having a list of priority species. We believe this would help users to understand how their efforts could help different species and make the LNRS simpler to use.

With regards to some of the specific suggestions made:

- We have expanded the species included under the 'Severn Estuary' assemblage to include all those that have internationally important populations on the Severn Estuary (adding Dunlin, Gadwall and Shelduck).
- We have included several fungi in the expanded priority species list, based on Plantlife's 'Important Fungus Areas', records in the West of England, and conservation status.
- We have added northern shoveler due to its internationally important population in the Chew Valley Lake. We had not previously added this as it was included within the site management plan for the Chew Valley Lake SPA, which is outside the scope of the LNRS measures. However, measures to create wetland habitat close to Chew Valley Lake and to improve water quality in the Upper Chew would help this species.
- We did not expand the number of fish species to include river lamprey, sea lamprey, twaite shad, allis shad, and sea trout, as these species are categorised as 'Least Concern' by the IUCN and because measures suggested to help eel and Atlantic salmon (e.g. removal or easing of fish barriers) would also benefit these species.

Summary of Responses

Priorities and measures for nature recovery

Overall priorities and measures

The majority (56%) of people who responded to the survey agreed that the priorities for nature recovery in the Consultation Draft are the most important for the region; 24% of respondents disagreed.

Within the MCA, 61% of people were in agreement and 30% disagreed.

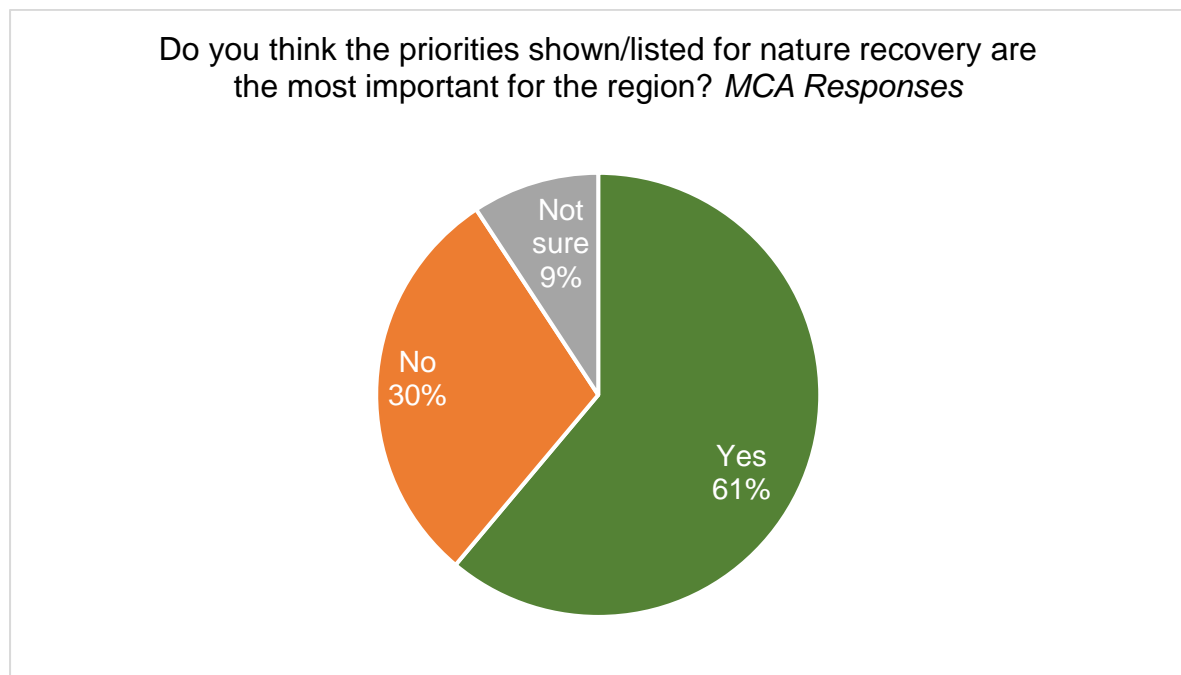


Figure 1 - Breakdown of responses within the MCA to the Consultation Survey question 'Do you think the priorities shown/listed for nature recovery are the most important for the region?'

A number of responses questioned why muntjac deer were singled out for population management when other species of deer also cause ecological damage to woodlands and other habitats.

Several responses also requested that protection of wildlife, green spaces and nature sites from development was included as a priority.

Similarly, there were a number of responses advocating for a greater focus on water pollution and sewage management, and frequent mentions of flooding concerns and the need for robust green infrastructure to address this.

There were frequent concerns raised about the impact of litter, recreational use, and dogs (both from disturbance and from chemical flea treatment) on wildlife.

Additional priorities/measures that were suggested included:

- Additional prominence for ponds and other wetland habitats away from floodplains and the coast.
- Surveying and monitoring of wildlife.
- Ensuring existing and new green spaces are accessible for all users.
- Creating new, large, multifunctional parks and green spaces, particularly where there will be new housing developments and in most deprived areas (Bristol Parks Forum).
- Expanding nature-based solutions to include dense plantations on steep slopes where there are known flooding issues (Avon Wildlife Trust).
- Reprofiling of rhynes/ditches to improve their value to wildlife (North Somerset IDB, but this is also relevant to the Lower Severn and Avon Vales).
- Enhanced measures to reduce plastic waste, including beach and river clean up initiatives and the promotion of biodegradable alternatives (Severn Estuary Partnership and ASERA).
- In relation to Priority 15 (non-native invasive species), the Severn Estuary Partnership suggested including measures to stop the spread of marine species of invasive non-native species that will colonise areas of brackish water, such as Chinese mitten crab.
- The Forestry Commission suggested including more detail in the measures to improve resilience of the current and future woodlands to climate change, and noted that non-native species may be appropriate in future woodlands, especially with the impacts of climate change increasing.
- Including a measure for the creation of productive mixed woodlands that align with current standards for sustainable forestry (Forestry Commission)
- Further detail on management of species-rich grassland in the measures (Cotswolds National Landscape).

Local priorities and measures

Of all respondents, 48% of people agreed that the priorities and measures in their local area were the most important ones, although 26% disagreed.

In the MCA, 50% of people agreed with this question and 27% disagreed.

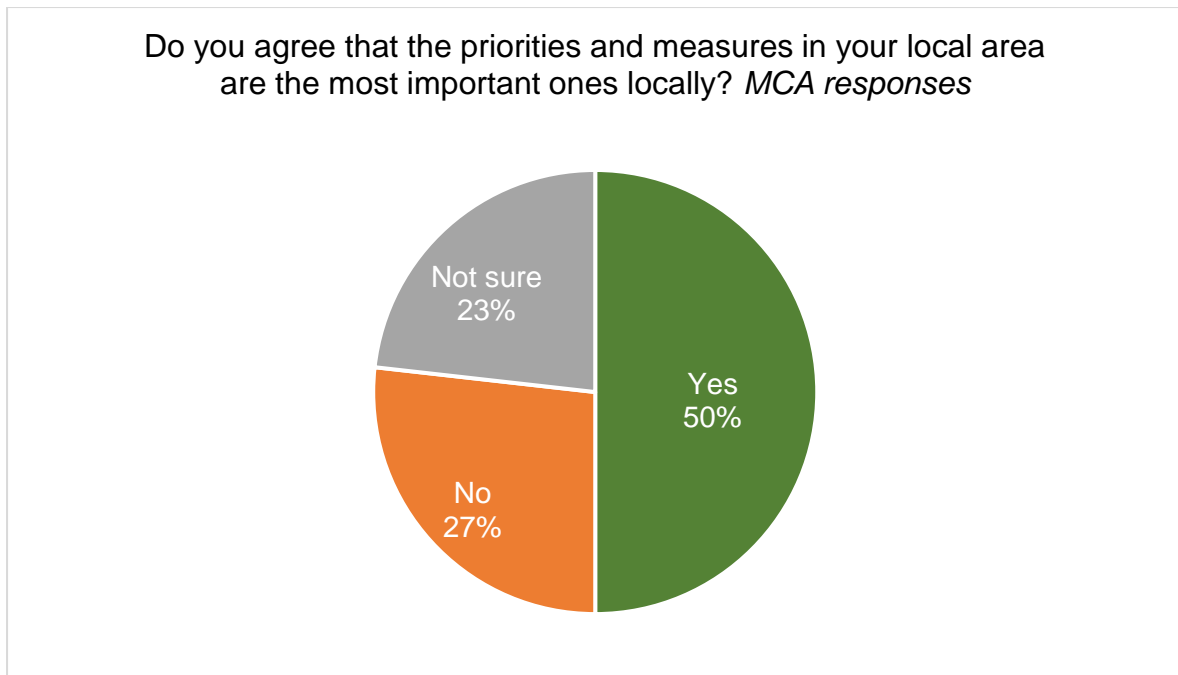


Figure 2 - Breakdown of responses within the MCA to the Consultation Survey question 'Do you agree that the priorities and measures in your local area are the most important ones locally?'

Suggestions for additional priorities and measures locally are difficult to group due to the local nature of the responses, but examples in the MCA included:

- Maintaining the ecosystems contained in old pit batches (i.e. old coal mining spoil heaps) in the Somer Valley.
- Reducing water pollution into the River Avon.
- Opportunities for natural flood management around Keynsham.

Many of the suggestions were related to the inclusion of particular areas in the mapped focus areas for nature recovery, which is covered separately.

Presentation of priorities and measures

Structure of Priorities and Measures

Although more people said responded 'yes' than 'no' to the question 'Is it clear which are the most important actions to take for nature recovery in your area, and across the Combined Authority/North Somerset?', many responses stated that it was not sufficiently clear what the most important measure(s) is (are) in their local area.

Is it clear which are the most important actions to take for nature recovery in your area, and across the Combined Authority/North Somerset?

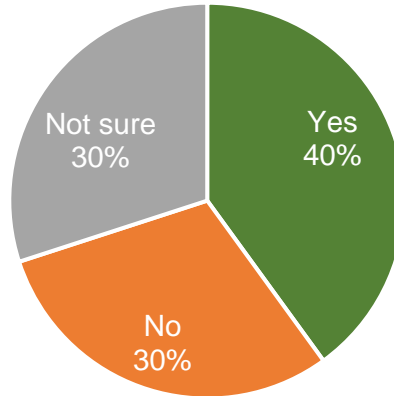


Figure 3 - Breakdown of responses to the Consultation Survey question 'Is it clear which are the most important actions to take for nature recovery in your area, and across the Mayoral Combined Authority/North Somerset?'

Many consultees added that it would be beneficial to have greater specificity in what measure(s) they should take for nature recovery. This could also make the final version of the LNRS simpler and easier to use.

Other requested that there be a clearer 'ranking' of priorities to make clear what was most important either regionally or in a given sub-area.

Some respondents also found the structure of the consultation site difficult to use, and fed back that there were too many documents to consult on.

A number of consultees requested that the final 'product' makes clearer where certain measures are proposed. It was also suggested that making the 'sub-areas' used to group priorities/measures smaller would allow for more specific measures for a given location.

Narratives for sub-areas

The majority of respondents (52%) found the narratives helpful in explaining what is needed for nature recovery locally, and why it is important; 15% did not find them helpful.

A few respondents suggested that 'targets' for e.g. hectares of habitat created, or numbers of trees planted would help to provide a clearer vision for what is proposed in a given area.

Urban categories

The majority (52%) of respondents were 'unsure' whether the four different categories to group measures in urban areas were the correct ones; 34% responded that they were correct, and 14% that they were not.

This reflected uncertainty among respondents regarding the purpose of the categorisation for urban areas and how they could be used. Those that did understand the categories

generally agreed that they were appropriate and helpful for understanding what can be done in urban areas to help nature.

Mapping of measures and ‘focus areas for nature recovery’

Mapping of focus areas

The majority of suggestions for areas that could be mapped as ‘focus areas for nature recovery’ were made on the Interactive Map, which can still be viewed online ([link](#)).

There were a large number of responses requesting that sites proposed for development (such as next to Bath Rugby Training Ground) were mapped as focus areas and protected for wildlife.

There were a number of suggestions to map additional urban green spaces in areas such as St. Paul’s, Redland Green, and Siston Parish.

Avon Wildlife Trust also suggested that mapping of riparian buffer stripes should extend higher into the upper catchments, which would help to encourage the implementation of natural flood management options, the creation of riparian woodland, and the spread of beaver populations.

‘Areas that are already of importance to biodiversity’

Some respondents also requested that additional sites were mapped as ‘areas that are already of importance to biodiversity’ to reflect their value to nature.

Priority Species

The majority of respondents were in agreement that the species listed as Priority Species in the Consultation Draft should be included as Priority Species, although one respondent suggested that some of the species were too rare to be engaging.

A number of respondents suggested that the Priority Species list should be expanded to include more common species that would help to engage people, such as brown hare, badgers, skylarks, owls, deer and otter.

Other species suggested for inclusion included:

- European Curlew, Pochard, and other birds in the full Severn Estuary SAC, SPA and Ramsar assemblage (Severn Estuary Partnership and ASERA)
- Severn Estuary SAC fish features (River lamprey, Sea lamprey, Twaite Shad, Allis shad, and sea trout).
- Common toad (Bufo Bufo), due to a regionally important population at Charlcombe Lane, Bath, and smaller populations elsewhere.
- English bluebell.
- Consideration of fungi and bryophytes, which are not currently included.
- Northern Shoveler (Mendip Hills National Landscape).

Some respondents expressed a concern that nature should be approached as a whole, rather than considering species independently.