



## LOCAL NATURE RECOVERY STRATEGY (LNRS) PUBLIC CONSULTATION

### 1 PURPOSE OF REPORT

- 1.1 Essex County Council (ECC) are consulting on a draft Local Nature Recovery Strategy (LNRS). Appendix 1 sets out a draft response to that consultation and this report seeks to agree a final response to that consultation.

### 2 LINKS TO COUNCIL'S PRIORITIES AND OBJECTIVES

- 2.1 Environment

### 3 RECOMMENDATION

- 3.1 It is proposed that the Sub-Committee **RECOMMENDS TO CABINET**

- (1) To agree to respond to the consultation with the response set out in Appendix 1. **OR**
- (2) To agree to the response set out in Appendix 1 with modifications.

### 4 INTRODUCTION

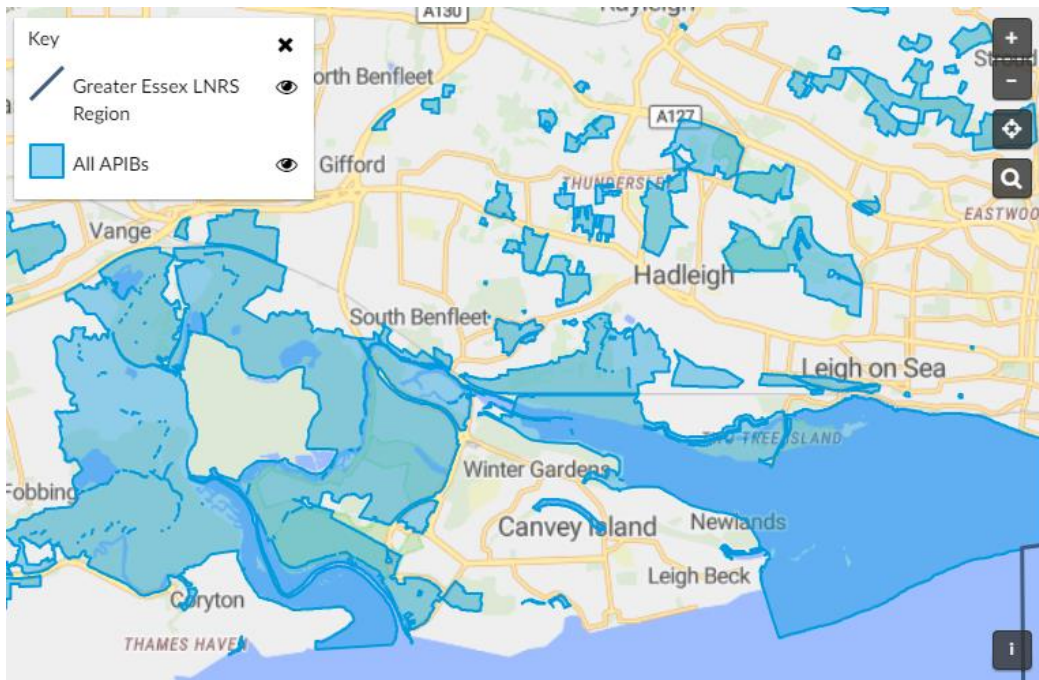
- 4.1 A Local Nature Recovery Strategy (LNRS) is a mandatory requirement of the Environment Act 2023. According to the Government, an LNRS '*will agree priorities for nature recovery and propose actions in the locations where it would make a particular contribution to achieving those priorities.*' They are designed to inform landowners, and decision makers on how a net gain of biodiversity can be achieved spatially.
- 4.2 Greater Essex (Essex County Council area, plus Southend of Sea City Council area and Thurrock Borough Council area) is one of 48 strategy areas the government identified in which a LNRS must be prepared. A strategy must contain a local habitat map and a written statement of biodiversity priorities. The government expects that a LNRS will propose actions such as the '*creation of wetlands, restoration of peatlands, planting trees and hedgerows and more sustainable management of existing woodlands and other habitats like grasslands.*'

- 4.3 The strategy should align with national planning policy and will support local plans and other planning documents and investment decisions on the use of money raised through biodiversity net gain credits. Government guidance can be found at: <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>
- 4.4 The Government appointed Essex County Council (ECC) as the lead authority in respect of preparing an LNRS for Greater Essex. They have worked through the Essex Local Nature Recovery Partnership to develop the LNRS, drawing on local knowledge from local authorities and expertise from partners such as Essex Wildlife Trust and the RSPB.
- 4.5 Local authorities within the Greater Essex area are identified in the secondary legislation as ‘supporting authorities’. It is expected that supporting authorities are engaged in and ultimately are supportive of the LNRS. Castle Point Borough Council is therefore a supporting authority in the preparation of the Greater Essex LNRS.
- 4.6 In June 2024, ECC consulted Castle Point Borough Council, and all other Greater Essex authorities on a pre-consultation draft LNRS, with the aim of getting support from all the supporting authorities to consult with the public.
- 4.7 A decision was made by the Portfolio Holder for Environment on 8 July 2024 – [Link to Portfolio Holder Decision](#) - to approve the pre-consultation draft LNRS for the purposes of consultation on the understanding that any comments the Council may have would be dealt with during the public consultation period.
- 4.8 ECC commenced a public consultation on the draft LNRS on 30 August which closes on 25 October 2024. This report seeks the views of the committee on the response which should be made by the council.

## **5 SUMMARY OF THE RESPONSE TO THE LNRS CONSULTATION AND KEY ISSUES ARISING**

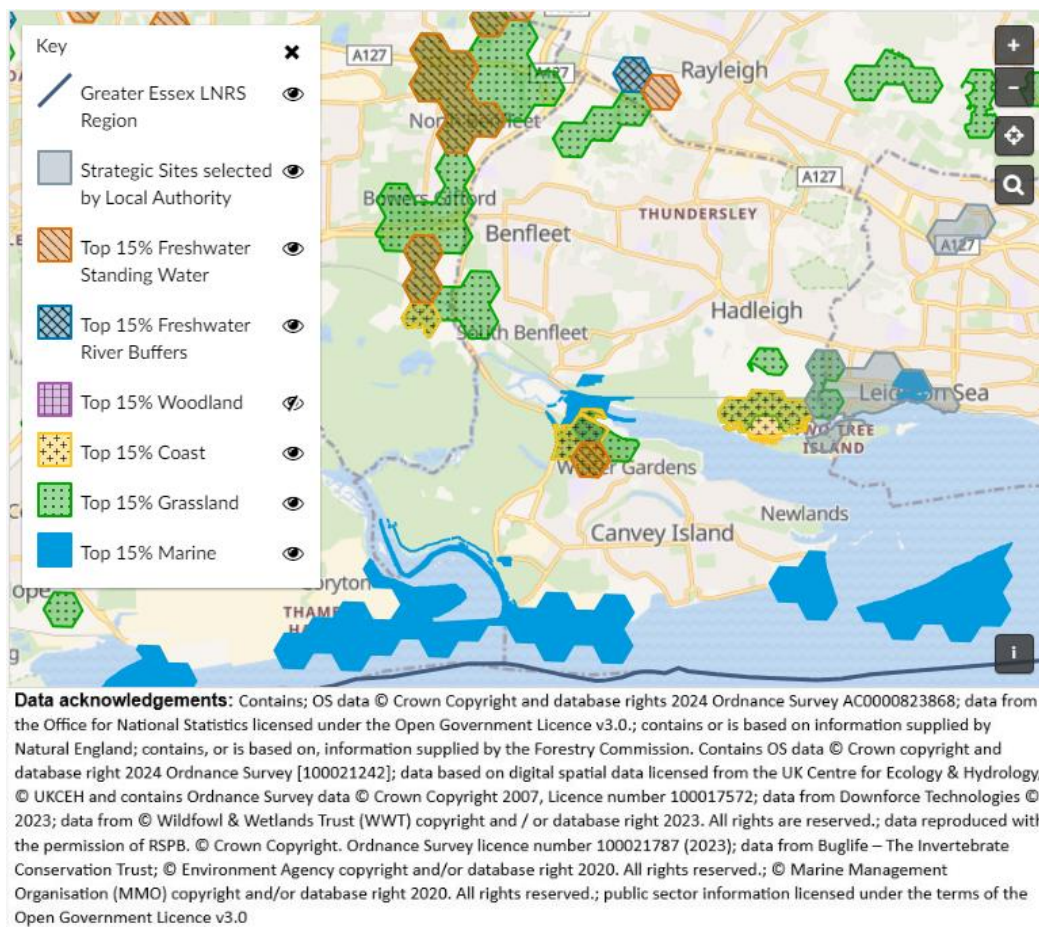
- 5.1 The LNRS for Greater Essex has mapped areas of particular importance for biodiversity (APIBs) across Essex. It has then, for the purpose of encouraging nature recovery, identified strategic creation opportunity areas where new habitats could be created to enhance and connect the network of habitats across the County.
- 5.2 In respect of Castle Point a map showing the APIBs is set out below in figure 1. A second map showing the potential strategic creation opportunity areas is provided as figure 2.

Figure 1: Map of Areas of Particular Importance for Biodiversity



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Figure 2: Map of Strategic Creation Opportunity Areas



- 5.3 Through the identification of APIBs, the LNRs identifies where it is most important to protect biodiversity and to invest in its enhancement. The identification of strategic creation opportunity sites helps to direct investment in habitat creation to those areas which would have the best outcomes in terms of overall nature recovery.
- 5.4 Where sites are identified in Castle Point, it is therefore expected that there will be investment in habitat enhancement. Some of this expectation may fall to the Council, but it may also fall to other partners, landowners etc. It should be noted that on Canvey a swathe of land around Waterside Farm is identified as a strategic creation opportunity area for several different types of habitat, and this presents both an opportunity and a challenge to the Council in terms of how it thinks about the long-term management and use of that site.
- 5.5 Identification of sites either as APIBs or as opportunity sites also has implications for planning decisions. Where a APIB would be affected by a development proposal, an uplift in Biodiversity Net Gain (BNG) is likely to be required. It is expected that APIBs and opportunity site mapping are key considerations in plan-making this has implications when considering proposals at Jotmans Farm and in parts of northwest Thundersley.

- 5.6 It also provides significant opportunities for the long term management of areas such as the Salvation Army estate in Hadleigh which has also, in part been identified as APIBs.
- 5.7 It is, however, noted from the mapping that woodland and grassland APIBs and strategic creation opportunity areas have not been identified around Daws Heath, which is surprising given the collection of woodland and meadow habitats in this area.
- 5.8 It is also noted that a habitat creation opportunity area for marine habitat has been identified around the oil and gas terminals on Canvey. Given the ongoing operation of these facilities there is a concern about the deliverability of this proposal.
- 5.9 The LNRS document, as well as setting out the mapping, also sets out the approach to be taken in respect of different types of habitats. This includes proposed actions for improving and enhancing those habitats and the overall network of habitats across the County.
- 5.10 Having reviewed the draft LNRS, a draft response has been prepared by officers, which is found in the supporting papers. The main issues that have been identified include the following:
- Errors or potential errors identified in the mapping of strategic opportunities within the LNRS and whether some opportunities have been missed. As well as the deliverability of some of the areas identified.
  - The functionality of the document and specifically how actions set out in the document can be delivered. Seeking further clarity on resourcing, funding, timescales and responsibility of actions to ensure it can be delivered effectively.
  - How the LNRS could work in relation to planning policy and development management, seeking further clarification on this.
  - Seeking further clarification on how the LNRS will be implemented, monitored and reviewed. Who is responsible to do this and how that will be resourced and funded.
- 5.11 The Committee is asked to review the draft LNRS and the draft response to the consultation and determine if the proposed response is appropriate and/or whether any additional comments should be made.

## **6 OPTIONS**

- 6.1 **Option 1: Do not respond to the consultation.** The issues set out in section 5 above may remain unaddressed if we do not provide a response and no other consultee mentions them.



6.2 **Option 2: Respond as per the draft response provided at appendix 1.**  
This addresses the issues identified in section 5 of this report.

6.3 **Option 3: Provide an amended response** which seeks different comments or additional comments to be made to the consultation, compared to that is summarised in section 5 of this report and detailed at appendix 1.

## **7 Preferred Option**

7.1 It is recommended that the Council responds to the consultation, as to not do so would leave those matters set out in section 5 of this report unaddressed. It is preferred that the response is as drafted at appendix 1. However, the purpose of bringing this report to the committee is to ensure that the response is thorough and addresses all relevant local concerns. Therefore, officers would be pleased to consider the inclusion of any amendments proposed by the Committee.

## **8 RISK IMPLICATIONS**

8.1 The LNRS sets out actions for local authorities which we will potentially be obliged to implement in accordance with duties set out in the Environment Act. There is a risk that in not responding at this time, the LNRS sets out actions for us to deliver that are not possible. In responding to the consultation it is possible to ensure that this issue is addressed.

## **9 ENVIRONMENTAL IMPLICATIONS**

9.1 Once adopted the LNRS could create huge environmental benefits within the borough through the identification of strategic corridors to improve and make biodiversity more resilient within the borough. Responding to this consultation will help inform the final strategy and help to ensure that it is delivered effectively.

## **10 FINANCIAL IMPLICATIONS**

10.1 There are no financial implications arising from the recommendation of this report, which is simply to respond to the consultation on the LNRS.

10.2 If the LNRS gives rise to additional resource requirements which have a financial implication for the Council, this will be reported later when details become known. As appropriate the Council will look towards new burdens funding and/or other sources of external funding to meet any new requirements.

## **11 LEGAL IMPLICATIONS**

11.1 There are no legal implications arising from the recommendation of this report, which is simply to respond to the consultation on the LNRS.

**12 HUMAN RESOURCES IMPLICATIONS**

- 12.1 There are no human resource implications arising from the recommendation of this report, which is simply to respond to the consultation on the LNRS.
- 12.2 If the LNRS gives rise to additional resource requirements which have a human resource implication for the Council, this will be reported later when details become known. As appropriate the Council will look towards new burdens funding and/or other sources of external funding to meet any new human resource requirements.

**13 EQUALITY AND DIVERSITY IMPLICATIONS**

- 13.1 An Equality Impact Assessment has not been completed as the decision sought relates to the issuing of a consultation response only.



Amanda Parrott

Assistant Director Climate and Growth

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**Background Papers:-**

Draft LNRS

[Draft Response to LNRS Consultation](#)

For further information please contact Maria Hennessy on:

Phone: 01268 882287

Email: [mhennessy@castlepoint.gov.uk](mailto:mhennessy@castlepoint.gov.uk)

Dear LNRS Team,

Thank you for consulting with Castle Point Borough Council (CPBC) on the draft Local Nature Recovery Strategy (LNRS). CPBC commend the work to date and the ambitious proposals within it to aide nature recovery in Essex.

In response to the consultation we have provided a number of comments below which we hope will help in making the document more effective in delivering the proposals it sets out.

***Mapping***

After reviewing the mapping that was provided alongside the consultation we have a number of comments in regard to the accuracy mapping and whether further investigation is required to ensure all opportunities have been found.

Firstly, Essex Place Services have recently prepared a Local Wildlife Site Review (LoWS) (2023) on behalf of the Council. This work was completed in 2024 following surveys in 2023. Some of the LoWS and Potential LoWS have been updated since the 2012 LoWS. It is hard to determine from the maps provided if this data has been included in the latest LNRS, but if not it is important that the latest data is factored into the LNRS work. CPBC can provide this data.

Secondly, the strategic opportunity mapping has highlighted areas within South Benfleet as being a strategic opportunity area for Marine habitat. There are areas to the south of South Benfleet which would be suitable for Marine habitat, however, the land to the south of The Glyders has been highlighted, which is up hill and appears to not fulfil the criteria of being suitable for Marine habitat due to its location. This may be an error on the map which may need to be updated.

It is clear that a lot of data has fed into this work, however we are surprised to see that no woodland opportunities have been included within Castle Point. In particular the areas surrounding Daws Heath where there are a number of existing wooded areas and nature reserves including West Wood, Belfairs Park Wood, The Prittlebrook and Pound Wood Nature Reserve which are within close proximity to each other and have potential to be connected through surrounding land. We would like to understand the reasoning behind this and whether this area could be a strategic opportunity for woodland in the final version of the LNRS.

The mapping has identified strategic marine opportunities to the south of Canvey Island in the Thames around the Oikos and Calor gas terminals. It is worth highlighting that this area is a busy nationally significant port. In terms of the identified opportunities has there been any testing to see whether the identified opportunities have been tested for deliverability? In this case we would question if it was deliverable and what provisions would or should be in place within these areas if it is unlikely that they would be delivered.

Lastly, a clearer relationship between the actions in section 6 of the document and the online mapping would be useful. Currently, the document lists actions related to each habitat type and the interactive map highlights the main actions that could be completed in that area. In some instances, the wording and numbering is different which makes it harder to see exactly what action is being referred to. It also appears to lose some of the action points within the document, for example it is unclear where the actions related to hedgerows, farmland, urban, scrub and mosaic habitats found within the document should be undertaken in practice. We would advise better signposting to ensure that it is clear where the actions within the document would be suitably implemented.



### ***Action planning***

The document is made up of a number of actions for the different type of habitats identified (section 6), as well as specific actions for different groups in section 9 of the document. We have some comments on how these sections work together and whether further information should be provided to make the actions clearer, in order to be implemented.

In section 6 of the LNRS it sets out a number of ‘potential actions’ for each of the different habitat types. For example, within the trees and woodlands section there are 11 potential actions. Each action has the ‘scale of action’, be it regional, local, household etc. Further into the document in section 9 it highlights specific actions for different groups, including local authorities, which are only ‘encouraged’ to complete the actions set out within it.

There are two issues concerned with action planning in this document from these sections. Firstly, it is not clear how the actions in section 6 will be implemented. This is in terms of how it will be, managed, funded, resourced, the timescales for delivery, implications if it is not delivered, ongoing management and maintenance and monitoring of the actions. To improve the deliverability of the LNRS these should be outlined to make it clear how it will be implemented. The Thames Estuary 2100 Plan 2012 is a good example of a cross-partner working strategy and sets out clearly actions of different partners to help make clear who was responsible for what.

Secondly, the actions outlined in section 9 are quite general in terms of what local authorities should be doing to deliver the LNRS and do not have a strong link to the specific actions in section 6. A greater alignment of partners and actions should be brought forward to help ensure actions are delivered.

In addition, in relation to section 6 it would be useful if each of the actions are linked back to the priorities of the study. For example, action 1 relates to creating a bigger, better or more connected habitat. If this was completed then it may make selecting the relevant actions easier based on what priority is relevant to that area.

Lastly, there are a number of groups that are listed in the LNRS in section 9 with specific actions. It is unclear who is coordinating the engagement of these groups in delivering the strategy and ensuring that actions are completed. A lot of the strategy is dependent on all groups doing their part, so it raises a concern of risk of not delivering these outputs if it cannot be managed effectively. For example, setting up local community nature recovery groups, who is implementing and managing this? Further detail on how these groups will be set up and continued to be engaged is crucial.

### ***Local Authorities***

In relation to planning specifically, it would be useful to have more detail on how the LNRS should be used in regard to planning applications and local plans. It is noted that the LNRS is a useful tool to guide delivery of Biodiversity Net Gain (BNG) and there are actions around off-site BNG sites and embedding that within local plans and action plans, however more detail would be beneficial. For example, guidance on what to do if an application came forward in a strategic opportunity area, what guidance is there for the local authority or developer in that case.

### ***Council owned land***

It is noted that a large area of the council's land in the north-west of Canvey Island, around Waterside Farm Leisure Centre has been identified as coast, freshwater standing water and grassland opportunities, connecting to marine opportunities to the north.

This area around Waterside Farm Leisure Centre is a valued asset in the community and one which the council is working towards ideas for future improvements, such as improved existing facilities and/or potential expansion. It is not entirely clear the impact that the LNRS would have to future development of that facility and surrounding area. Further details on how the LNRS could work with potential future developments where they cross over into the identified strategic opportunities would be beneficial for the council as a landowner, but also in relation to planning applications and identifying policies for the Castle Point Plan. Further details on this could help to ensure that developments and the objectives of the LNRS work hand in hand in delivering the best outcomes for the area.

***Implementation, monitoring and reviews***

In regards to implementing and monitoring the LNRS, within section 9 of the document, the final action for local authorities is to:

*'Establish mechanisms for monitoring and reporting on the implementation and effectiveness of nature recovery actions outlined in the strategy, tracking progress towards biodiversity targets'*

This action appears to put the onus on local authorities to monitor and report the implementation of the LNRS and its effectiveness. The local authority has a duty to report and monitor on the delivery of BNG, which may begin to cross over into the LNRS as sites within the strategy may begin to become BNG sites. However, implementing the LNRS as a whole is a large undertaking and one that a local authority has no control over outside its administrative boundary as various stakeholders are listed as having responsibilities for actions. In addition, there is no detail on how this work could be resourced and what level of monitoring and reporting is required. Some of the actions would need specific expertise to oversee its implementation and the effectiveness of it.

Further detail on how the LNRS will be monitored, expressing the responsibility and level of monitoring indicators would be beneficial for the implementation of this strategy. As the wording currently stands the council has concerns that need to be addressed as it may impact the deliverability and effectiveness of the strategy.

Lastly, a section on when the LNRS will be reviewed and what would trigger a review would be useful. This will help to ensure that the document going forward remains relevant and up to date as it is delivered. This will help to achieve the outcomes it sets out to deliver in creating bigger, better and more connected habitats.