

England Local Nature Partnerships

Contact: sue@goodfellowenvironmental.co.uk

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Dear Lord de Mauley

New Environmental Land Management Scheme – data validation and targeting

On behalf of England's LNPs (listed below) I would like to thank Defra for asking us to play an active role in the local NELMS validation and targeting exercise. As champions for the natural environment LNPs are ideally placed to provide the local expertise required to ensure that NELMS is able to make a significant contribution to achieving Biodiversity 2020 and WFD targets.

LNPs have been discussing this exercise and identified a number of generic concerns. Whilst details will be provided through the local statements we felt that we should write collectively to highlight key concerns and set out our recommendations.

Headline concerns

1. Problems with the national data sets

It is clear that the national data sets are not fit for purpose. Local workshops have shown that information on Section 41 species, priority habitats and historic data is missing, incorrect or inconsistently used. Examples:

- Greater horseshoe bat and cirl bunting data is missing for South Devon (a national stronghold for these species) and farmland / woodland butterfly data is missing in Morecambe Bay (and other LNP areas).
- Large parts of the Thames Basin Heaths SPA are not mapped as priority habitats.
- Important priority habitats, such as the Dartmoor and Peak District hay meadows and Morecambe Bay saltmarsh, are missing, often due to the size thresholds used.
- Historic Environment Record information is not included (SHINE data is often out of date or incomplete).

2. Interpretation of the national data sets

Across the country there are serious concerns relating to inappropriate targeting of woodland creation and the lack of habitat creation targeting for other habitats. Examples:

- Proposed planting of the New Forest mires, East Devon Pebblebed heathlands, Hertfordshire chalk grasslands, Shropshire Meres and Mosses, Peak District moors, Northants grasslands and Lincolnshire fens.
- Areas suitable for woodland creation, such as the Lincolnshire Limewoods and Rockingham Forest, have not been targeted.
- Existing biodiversity opportunity maps should be used to target the creation of priority habitats e.g. NELMS does not currently address the issue of chalk grassland fragmentation in Kent.

3. Lack of clarity relating to the inclusion and interpretation of data

Commenting on the maps has been difficult due to the lack of information provided on the data sets, thresholds for priority habitats and interpretation of this information.

Recommendations

- a. Ensure that the national data sets used are fit for purpose and, where appropriate, include local data e.g. priority habitats, Section 41 species, Local Sites (Wildlife and Geology), Historic Environment Record (including Historic Landscape Characterisation), landscape conservation projects and biodiversity opportunity maps.
 - The national Single Habitat Layer should include up to date data obtained via partnership with Local Records Centres (LRCs), or equivalents, and any constraints on publication must be discussed and acted on. In the longer term information from FEPs / NELMS should be fed back to LRCs.
 - In order to ensure that priority habitats are effectively incorporated into NELMS, all priority habitat datasets, with no thresholds set, should be used in the mapping for each NCA.
- b. The woodland creation opportunity layer is amended to ensure that other priority habitats are not targeted for planting. A new habitat creation layer should be produced using existing opportunity maps.
- c. The data issues being raised through this process are fed into the species and habitats data review being undertaken by Defra (Mark Stevenson), NE and others. LNPs were consulted on this review in February this year and we would welcome an update.
- d. Due to the problems highlighted the majority of LNPs have not been able to validate the national data being used in NELMS targeting. We therefore request another opportunity to validate the data once concerns raised through the local workshops have been addressed (including clarity regarding data used / analysis carried out). We appreciate that there are tight deadlines and do not wish to hold things up. However it is critical that sufficient time is given at this stage to ensure that the data is fit for purpose and thus ensure that targeting of reduced agri-environment funds is as effective as possible.
- e. The underlying data is then updated more than once during the lifetime of this scheme. Ideally there should be annual updates.
- f. LNPs are consulted, with sufficient time to effectively input, on the targeting statements as they are developed. Targeting statements should use all best available data and information (including Landscape Character information) The best way to achieve this input as quickly as possible should be agreed with LNPs.

We would appreciate confirmation that the above recommendations can be taken forward, and if not, an explanation as to why it is not possible.

We would like to thank local NE, FC and EA staff for organising the webinars and workshops at such short notice and offer our continued help in order to develop and roll out a quality scheme.

We look forward to hearing from you.

Yours sincerely



Suzanne Goodfellow (Chair, Natural Devon)
On behalf of the LNP Chairs listed below

cc: Mike Rowe, Deputy Director, Defra

Letter endorsed by:

Matthew Thomson, Chair, Cornwall and the Isles of Scillies LNP

Richard Powell OBE, Chair, Wild Anglia

Richard Astle, Chair, Cambridgeshire LNP

Frank Major, Chair, 3 Rivers LNP

Dr Dominic Hogg, Chair, West of England LNP

Paul Wickham, Chair, Surrey Nature Partnership

Tom Jeynes, Chair, Humber Nature Partnership

Simon Nash, Chair, Somerset LNP

Cllr Cecilia Motley, Chair, Shropshire, Telford & Wrekin LNP

John Wells, Chair, Lancashire LNP

Simon Bovey, Chairman, Northamptonshire LNP

Anne Miller, Chair & Ingo Schüder, CEO - Oxfordshire LNP

Richard Thake, Chair, Hertfordshire LNP

Geoff Nickolds, Chair, Peak District LNP

Ian Fielding, Chair, North Yorkshire & York LNP

Staffordshire & Stoke LNP Shadow Steering Group

Richard Chadd, Chair, Greater Lincolnshire Nature Partnership

Anne Selby, Chair, Greater Manchester Natural Capital Group

Will Bond, Vice Chair, Dorset LNP

Chris Koral, Chair, Cheshire Region LNP

Tony Whitbread, Chair, Sussex LNP

Paul Barnard, Chair, Plymouth Area LNP

Rob Garner, Chair, Herefordshire LNP

Emily Barker, Vice-Chair, Worcestershire LNP

Debbie Tann, Chair, Hampshire and Isle of Wight LNP

Gideon Ben-Tovim OBE, Chair, Nature Connected - The Liverpool City Region LNP

Roger Mortlock, Chair, Gloucestershire LNP

Caroline Jessel and Will Day, Chairs, Kent LNP

Sir Henry Aubrey Fletcher, Chair, Bucks and Milton Keynes LNP

Susannah Bleakley, Secretariat, Morecambe Bay LNP

Richard Inglewood, Chair, Cumbria LNP

Jon Balaam, Vice Chair, Bedfordshire LNP

Jacqui Gedman, Chair, Yorkshire West LNP

Alan Menzies, Chair, Hull & East Yorkshire LNP Shadow Board