

Oxfordshire's draft Local Nature Recovery Strategy (LNRS) consultation - phase 3

Introduction

Authorities across England have been appointed by government to create Local Nature Recovery Strategies and government expect that these will create a set of strategies which, together will help to join up national efforts to reverse the decline of biodiversity.

The drafted documents and draft map aim to summarise the top biodiversity priorities to people and organisations in Oxfordshire. The draft map also aims to identify specific locations where some of these actions could be delivered to create 'areas that could become of particular importance to biodiversity' in the future.

The LNRS documents and map aim to help people and organisations in Oxfordshire to decide how, and possibly where, to create, restore, or improve habitats that can particularly help biodiversity. The actions and priorities all focus on improving biodiversity and by achieving them, those actions also offer important wider benefits to people and the environment.

The Oxfordshire LNRS comprises of four key parts:

1. draft **Statement of Biodiversity Priorities**
2. draft **Species Priorities List**
3. draft **Description of Strategy Area**
4. draft **Local Habitat Map**

The consultation on the draft LNRS documents closed at 11.59pm on 1 December 2024.

This document contains the joint response from both South Oxfordshire District Council and the Vale of White Horse District Council to the draft LNRS documents.

LNRS Consultation Survey (phase 3)

Q1	I am responding to this survey as (Choose all that apply)
<input type="checkbox"/>	A local community group taking nature recovery actions
<input type="checkbox"/>	A representative of a nature recovery organisation
<input type="checkbox"/>	A parish, town, district, or county councillor
<input type="checkbox"/>	An Oxfordshire resident
<input type="checkbox"/>	An Oxfordshire student
<input type="checkbox"/>	A business operating in Oxfordshire including utilities companies
x	A local authority officer or employee
<input type="checkbox"/>	A manager or owner of land in Oxfordshire
<input type="checkbox"/>	A farmer using land in Oxfordshire
<input type="checkbox"/>	A tenant farmer using land in Oxfordshire
<input type="checkbox"/>	A farmer/tenant farmer outside of Oxfordshire
<input type="checkbox"/>	A member of the public living outside of Oxfordshire
x	Other group (please specify below): This is a corporate response on behalf of South Oxfordshire District Council and Vale of the White Horse District Council.

Q1e.	If you selected a local authority officer or employee, please tell us your job role and/or the name of the local authority that you represent:
	Nature Recovery Officer South Oxfordshire District Council and Vale of the White Horse District Council. This response is a corporate response on behalf of South Oxfordshire District Council and Vale of the White Horse District Council.

Q2	To provide feedback on the draft LNRS, please tell us which of the 4 documents you have viewed (Choose all that apply)
x	Draft Statement of Biodiversity Priorities
x	Draft Species Priorities List
x	Draft Description of Strategy Area
x	Draft Local Habitat Map

Q3	To what level do you agree with the following statement: The LNRS documents and map, listed above, have created a helpful set of priorities and actions to improve biodiversity in Oxfordshire? (Choose one option)
	Strongly disagree
	Disagree
	Neither agree nor disagree
	Agree
x	Strongly agree
	Prefer not to say
	I don't feel I know enough to comment

Q4	Would you like to comment further on any of the draft documents? (Choose one option)
x	Yes
	No

Q5	Would you like to comment on the Draft Statement of Biodiversity Priorities? (Choose one option)
x	Yes
	No

Draft LNRS Statement of Biodiversity Priorities

If you said that you'd like to comment on the draft Statement of Biodiversity Priorities, please answer the following questions. If this is wrong, please untick this option on the previous question or you can leave the following questions blank.

Q6	Please tell us whether you are commenting on a priority, a potential measure (action), or something else. (Choose all that apply)
	Priority
x	Potential Measure (action)
x	Something else

If you selected 'priority' please answer the following two questions:

Q7	If there are any priorities or text that you think are missing in our 'draft Statement of Biodiversity Priorities' for Oxfordshire, please tell us what you feel should be added:
	NA

Q8	If there are any priorities or text on our 'draft Statement of Biodiversity Priorities' that you think should not be included, please tell us what you feel should be removed:
	NA

If you selected 'potential measure' please answer the following two questions:

Q9	If there are any potential measures (actions) that you think we need to add text to, or include, please tell us what you feel should be added:
	PM41: Is there scope for an additional 'potential measure' relating to canal restoration, given the ongoing efforts to restore the Wilts and Berks Canal? Doesn't quite seem to be covered by any of the others in this section.

Q10	If there are any potential measures (actions) that you think we need to exclude from the list, please tell us what you feel should be removed:
	PM68: We are not convinced the use of “ and cultivars ” is helpful – it is likely to encourage uses of the many commercially available “wildflower” seed mixes and turfs that contain non-natives or garden varieties of native species. This can be a source of invasive species issues, e.g. via introducing more vigorous cultivars of native species that outcompete or interbreed with the originals. Variegated Yellow Archangel (Schedule 9 invasive plant and a cultivar of a wild species) is a good example of how this can go wrong!

If you selected ‘something else’, please answer the following question:

Q11	If there is anything else that would help you to understand or use the draft statement of biodiversity priorities, please tell us what difference(s) you would like to see?
1.	<p>Regarding improving, creating and restoring Heathland and Acid Grassland (P7 (PM15) and P8 (PM16)): There are very few opportunity areas mapped, which is a reflection of how rare the required soil type is in Oxfordshire. However, there seem to be fewer opportunities than identified in the Oxfordshire Local Biodiversity Action plan. Are the parameters too tight? Maybe expand to land in Soilscales 7 and 10?</p>
2.	<p>Regarding Appendix 2 of the Statement of Biodiversity Priorities: Appendix 2 of the Statement of Biodiversity Priorities lists the local, regional, and national plans, objectives, and/or strategies that were reviewed as part of the process of choosing potential priorities and potential measures for Oxfordshire’s draft Local Nature Recovery Strategy. We suggest that South Oxfordshire and Vale of White Horse District Councils’ current, adopted local plans should also be considered, in addition to the emerging Joint Local Plan. This is consistent with the approach taken for Oxford City and West Oxfordshire. (Although we note that neither the adopted nor the emerging local plans for Cherwell are listed.) It is important that local plans across the county are considered consistently.</p> <p>Our adopted local plans are:</p> <ul style="list-style-type: none"> • South Oxfordshire Local Plan 2035 (adopted December 2020) • Vale of White Horse Local Plan 2031 Part 1 (adopted December 2016) • Vale of White Horse Local Plan 2031 Part 2 (adopted October 2019)
3.	<p>For accuracy/clarity, we also ask that the following references are amended:</p> <ul style="list-style-type: none"> • South and Vale District Council Joint Local Plan Preferred Options – This should be referred to as: South Oxfordshire and

Vale of White Horse Joint Local Plan 2041 Preferred Options (January 2024).

- **South and Vale Green Infrastructure Strategy – This should be referred to as: South Oxfordshire and Vale of White Horse Green Infrastructure Strategy (Chris Blandford Associates, October 2017).**

It is important to recognise that emerging local plans across the county have progressed in parallel to the production of the LNRS. In finalising the LNRS, consideration should be given to the latest versions of emerging local plans and evidence as appropriate.

For South Oxfordshire and Vale of White Horse, the latest documents to consider are:

- South Oxfordshire and Vale of White Horse Joint Local Plan 2041 Pre-submission publication version (October 2024). This is available to view online: <https://theconversation.southandvale.gov.uk/jlp/>.
- South Oxfordshire and Vale of White Horse District Councils Green Infrastructure Strategy and Open Space Study (LUC, September 2024). This is available to view online: <https://www.southandvale.gov.uk/joint-local-plan-2041-supporting-documents/>.

4.

We also highlight that South Oxfordshire and Vale of White Horse District Councils have produced some new evidence on lowland fens to inform our new Joint Local Plan. This is likely to be highly relevant to the LNRS. Please see: Lowland Fens: Identifying sites and mapping hydrological risk zones in South Oxfordshire and Vale of White Horse (Freshwater Habitats Trust, 2024). The report is available to view online: <https://www.southandvale.gov.uk/joint-local-plan-2041-supporting-documents/>. The councils hold the GIS mapping for this evidence and would be happy to provide this to feed into the production of the LNRS.

5.

Regarding Specific/minor issues:

- P. 5, penultimate paragraph: typo. Should be "Of" not "OK"
- P. 5- not convinced that the arrows leading from the first box of the decision tree/flowchart are the right way around. Surely measures solely designed for a co-benefit and not for improving habitats were scoped out of the draft priorities, not in?
- PM28: decapitalise "Increase"
- PM35: Last two sentences repeat themselves somewhat.
- PM50: The first two sentences appear contradictory – We know what it's trying to say but the author may need to swap the order and link with "but" to make the point more clearly.
- PM52 "Gravel Pit sites" not "Gravel Pit sties"
- PM53: "Habitat type" not "Habitat types"
- PM58: Slightly awkward wording – consider more punctuation or splitting sentence.
- PM66: "those who"? (missing word)
- PM67 and 68 overlap to a significant degree - are both needed or could they be merged.
- PM77: first sentence needs editing for clarity.

**This is the end of questions about the Draft Statement of Biodiversity
Priorities.**

Q12	Would you like to comment on the Draft Species Priorities List (Choose one option)
x	Yes
	No

Draft LNRS ‘Species Priorities List’

Q13	Please tell us what your comment relates to. Please check our webpage to be aware of the process that all LNRSs have to follow when creating a species priorities list. (Species are types of animals, plants, fungi, or microorganisms). Choose all that apply.
x	I think information or species should be added to the list
x	I think information or species should be removed from the list
x	Something else about the Species Priorities List

If you selected 'something should be added', please answer the following question:

Q14	Is there anything that you think is missing from the ‘draft Species Priorities List’? Tell us what you think we should add
1.	<p>Regarding Species which could be worth considering, acknowledging that the list is intended to be expanded:</p> <p>Lesser Spotted Woodpecker (declining drastically, possibly the odd territory still in Oxfordshire). Wet woodland creation and management (particularly standing deadwood retention) likely to be beneficial, although the national speed of decline of this species doesn't seem to be explicable fully in terms of habitat loss.</p> <p>Marsh Harrier (Until recently did not breed in Oxfordshire, expanding and now breeds at Otmoor (thus in the same category as Crane). Reedbed creation benefits this species.</p> <p>Hawfinch (We believe this species breeds very locally in the Cotswolds/Chilterns? Parts of the county are also important for this species in winter.)</p> <p>Hymenopterans (bees, wasps and ants): Oxfordshire has many species with national rarity or conservation status. Please continue to seek a reviewer for the taxa as there are many specialist species within this Taxa for which general habitat considerations are unlikely to go far enough and opportunities for targeted conservation should be explored.</p>
2.	

	<p>Regarding Potential Measures:</p> <p>Blackthorn Butterflies: Should the text also mention ash as “master trees” of this species are used as perches (largely by Brown Hairstreak) prior to egg-laying on the blackthorn?</p> <p>Breeding Waders: Management also involves predator control and fencing (may or may not be intentional that these have been omitted – they are included in the separate section for curlew). Species list should potentially include lapwing (unless this has been filtered out by the shortlisting process?)</p> <p>Marsh Fritillary: Given the proneness of Devil’s Bit Scabious to being lost from areas of habitat (it creates no seedbank), could actions for the fritillary include reestablishing DBS in suitable areas of large, unoccupied habitats?</p> <p>Monkey Orchid: an exclusively grassland species (does not grow in the yew woodland at Hartslock). Given that a potential major risk to the Hartslock population is hybridisation with Lady Orchid also present at the same site, an action for this species could include targeted reintroduction at different suitable sites where Lady Orchid is absent?</p>
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If you selected 'something should be removed, please answer the following question:

Q15	Is there anything that you think should be removed from the ‘draft Species Priorities List’? Tell us what you think we should remove.
	Great crested newt: Nonsensical sentence/clause in the text: “ <i>New development/infrastructure can include requires amphibian friendly landscaping</i> ”.

If you selected 'something else', please answer the following question:

Q16	Is there anything else that would help you to understand or use the draft Species Priorities List? Please tell us what difference(s) you would like to see.
	<p><i>Ellipteroides alboscuteallatus</i>: Extremely pedantic comment, but the scientific name of the Curled Hookmoss should read “<i>Palustriella commutata</i>”. This is almost certainly an autocorrect error.</p> <p>Great crested newt: The photo is of a smooth newt! (We have checked the Flickr original). The picture on P.51 of the Draft Description of the Strategy Area (which does show a GCN) could be reused.</p> <p>Noble Chafer: Typo: “its” not “it’s”</p> <p>Southern Damselfly: Another autocorrect error in the scientific name which should be “<i>Coenagrion mercuriale</i>”</p>

Q17	Would you like to comment on the draft Description of Strategy Area (Choose one option)
x	Yes

Draft LNRS 'Description of Strategy Area

Q18	<p>What do you think we should change about the draft Description of the Strategy Area? Please tell us what you would add, remove, or what difference(s) you would like to see.</p>
	<p>This is well written and structured. The focus on different types of restoration actions by National Character Area (NCA) is a very nice link between different planning disciplines (landscape and ecology). The description of each NCA is clear and helps set the scene/describe the geographic context.</p> <p>To make this document easier to navigate, it would be helpful for the contents page to include page numbers in addition to the links to the sections.</p> <p>The document would benefit from closer proofread, full stops are missing in places. Specific/minor issues:</p> <ul style="list-style-type: none"> • P5. Needless repetition of the Executive Summary title looks rather odd. Middle column: "Government" not "Governments" • P.10, Figure: not clear whether this is the current state of play or an aspiration. • P.21, Condition status of SSSIs: Should read "unfavourable recovering" • P.29: As per previous comment – the Willow Tit may be best moved to "on the brink". The Oxfordshire Ornithological Society is probably the best contact for up-to-date news on this species but we understand that it has gone from its last regular county site near Grimsbury Reservoir (Banbury). • P.34, figure: The "black border" appears to be missing, but it does then appear on the inset of this figure on P.35 • P.40, "Bring woodlands into management": should read "an excessive number of tall, mature trees" • P.43, "Ecosystem Services: should read "Rollright Stones, and Neolithic long barrows" • P.51, bullet point 2. The mention of Benson is a non-sequitur after talking about the Letcombe Brook – this sentence needs to be edited for clarity • P.52: The swift population abundance chart could really do to be on P. 53 where the text relates to it. • P.56, "Biodiversity of Note" – text should read "Its unusual geology", not "It's unusual geology" • P.59. It may be worth emphasising (here and elsewhere) that deer in particular reach unsustainable levels because they have no remaining natural predators. • P.60. Main title should read "5.98% of county" • P.63 "Ecosystem services" – misspelling of "downland" 2/3 of way down the paragraph. Third bullet point: We think the text means to say that the Ghost Orchid is infamously elusive (those embittered orchid hunters who are cynical that it exists at all may maintain that it is illusive, but we don't think that was meant here!).

	<ul style="list-style-type: none"> • P73, bottom of first paragraph – holding reference to “Appendix X” needs updating. • P.80. The catchment maps in this section should be reviewed. We are not hydrogeologists – but we presume that the mapped catchments of the sub-rivers should not overlap with each other or with the Thames proper (e.g. the Ock and Windrush maps appear to show significant portions of the Thames downstream of where these rivers join it). • P83-4, “Challenges and Opportunities” last paragraph: the commentary about planning to avoid floodplain encroachment during development being outside the scope of the LNRS is really a matter for an introductory text for the whole document. • P.86, “Ecological Importance” last paragraph. The last sentence (beginning “since then, hydrological modelling...”) tails off at the end and doesn’t quite make sense. • P.96, “Ecological importance” second paragraph. Should read “However, there are almost no substantive areas of woodland....” • P.97, “Challenges and opportunities” penultimate paragraph. Should read “...have all caused a decline in the ecological quality of these streams” • P.101, bottom of Left column: Different font on references throughout this paragraph doesn’t match the rest of the document, plus next sentence should read “Changes to weather patterns are expected”. • P.103, pink box: Title should read “Summary of pressures” – but the other bold text below it could just as easily act as the title/standout phrase for this box.
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LNRS ‘draft Local Habitat Map’

Anything else?

Q19	<p>Is there anything else that you would like us to know as we create the final version of the Local Nature Recovery Strategy?</p> <p>If so, please use the box below to tell us what we could change about the draft LNRS</p>
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1.

Regarding general functionality of the Map:

The ArcGIS plugin generally works well, and we have been able to add targeted comments successfully.

The polygons of the LNRS areas contrast well with the background mapping but are transparent enough that the map detail can be discerned below.

Visually, it is not particularly easy to view and compare the list of potential actions that apply in a given place once you have selected a point (with the click-through right/left arrows). It would be more user-friendly if clicking on a location caused the interface to display a single, scrollable menu that lists all the potential actions, preferably hyperlinked to the relevant pages in the *Statement of priorities* document.

It would also be useful if you could filter the LNRS area layer by Potential Measure (e.g. to only display one PM at a time). We have been able to achieve this by fiddling around with the layers in the ArcGIS plugin but it isn't very intuitive.

We would love to see an additional search function for grid reference would be helpful as most biological records are recorded this way, rather than a postcode.

The use of a coarse geometry of hexagons to define the boundaries of most of the LNRS areas is visually a bit odd, especially given that some areas have much more precisely marked boundaries (e.g. parcels in and around Didcot Power Station). We presume the intention is to amend and fine tune the boundaries of polygons over time, otherwise it appears rather a blunt tool.

2.

There are inexplicable gaps in mainly contiguous recovery areas where the gaps share the attributes of the surrounding opportunity area (false negatives). Similarly, there also appear to be false positives, where there are isolated single green polygons surrounded by white space. We suggest that these are a function of the algorithm rather than lack of opportunity and these areas are 'smoothed' to create consistency in connectivity.



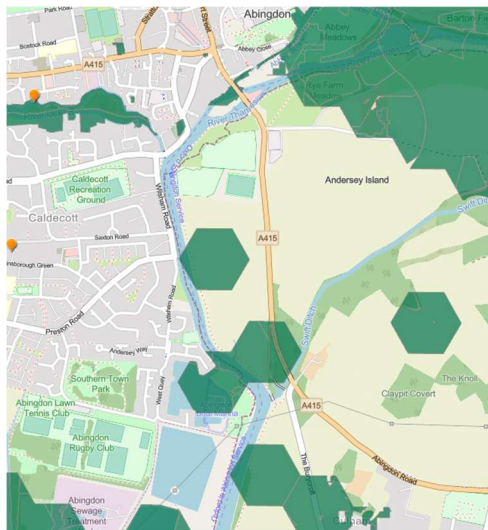
The pond layer has evidently been based on TVERC pond location data. For the final version, it would be useful if the outcomes arising from this could be sense checked somehow, because this layer identifies some ponds which are no longer present, omits some which are, and identifies some other waterbodies as ponds. This can create some odd outcomes – e.g. PM 43 (“Undertake sensitive management and restoration of ponds and pond complexes to improve pond biodiversity and water quality”) is

identified for the municipal outdoor swimming pool in Abbey Meadows, Abingdon.

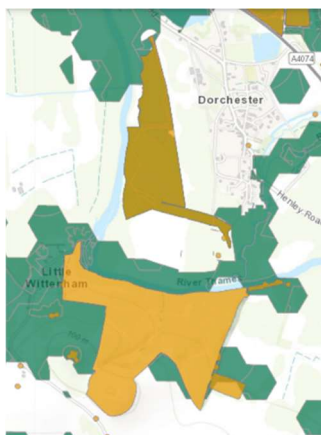
Regarding River Thames floodplain connectivity:

The LNRS Local Habitat Map picks out the majority of the river systems in South Oxfordshire and the Vale of White Horse very well, which we strongly support as these are obvious corridors through which wildlife can move and often represent areas with good potential for habitat creation or restoration due to other constraints such as flooding. The River Thames has been picked out well upstream of Abingdon however, **downstream of Abingdon all the way to Whitchurch on Thames the recovery area lacks continuity with many areas of the river excluded from the recovery area without any apparent reason.** There are many examples that we could give but a few have been picked out below for reference:

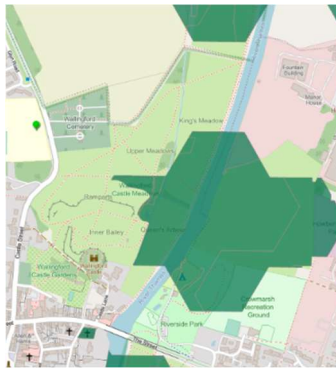
Example 1: the area immediately downstream of Abingdon where there is good opportunity for habitat creation and restoration but the recovery area along the river lacks continuity.



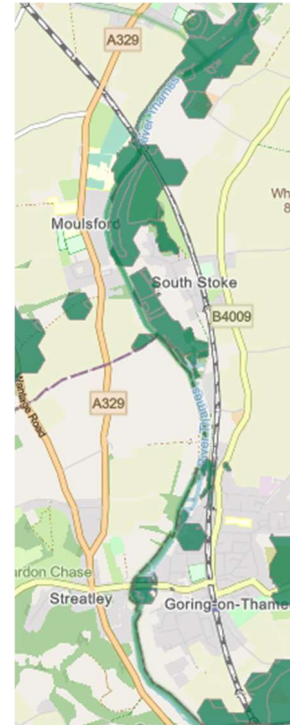
Example 2: the area between Dorchester and Shillingford. This contains areas (River of Life 1 and 2) which are being restored for nature and are inexplicably omitted.



Example 3: Areas to the east of Wallingford are only 'patchily included in the recovery area and have omitted sites such as Wallingford Castle Meadows which is being restored by South Oxfordshire District Council.



Example 4: Areas around Goring where there is good potential for habitat creation or restoration, but only 'patchy' bits of recovery area are picked out.



Regarding LNRS Habitat Map (Potential Measures) and emerging Local Plan interface:

We have observed that some of the areas identified as having potential to become of particular importance to biodiversity are allocated for development in adopted local plans and/or proposed for allocation in emerging local plans.

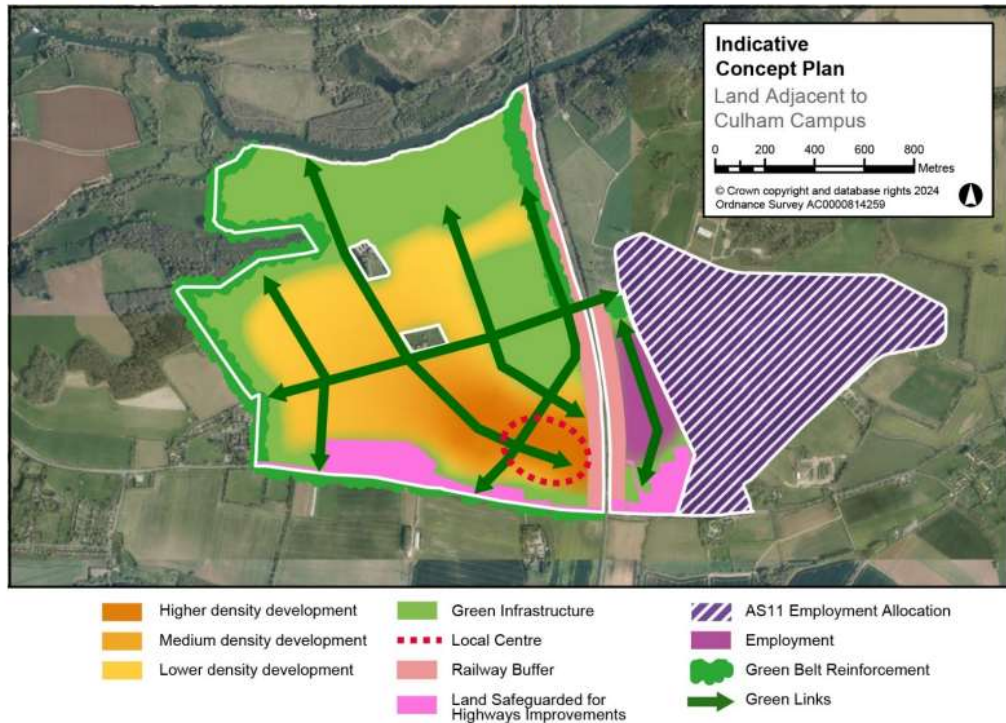
3. For example, Land adjacent to Culham Campus. This site is allocated for development in the adopted South Oxfordshire Local Plan 2035 (Policy STRAT9) and is proposed for allocation in the emerging Joint Local Plan (Policy AS2).

This is the proposed site allocation (outlined in red):

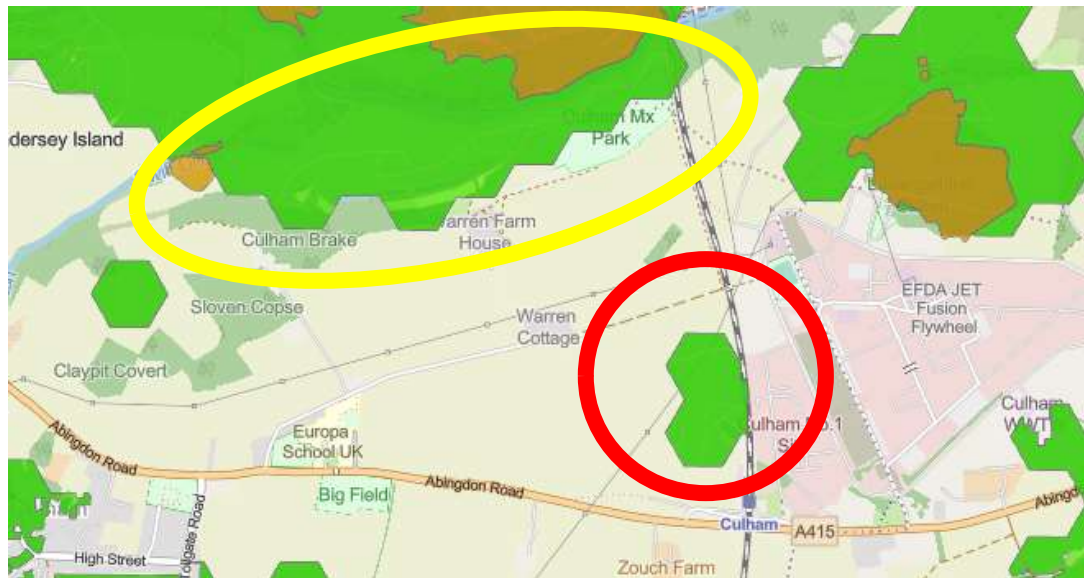


This is the concept plan for the site:

Figure 8.2 – Concept Plan for Land adjacent to Culham Campus



This is an extract from the Draft Local Habitat Map showing the same area:



The area highlighted by the yellow oval is identified as having potential to become of particular importance to biodiversity. Whilst this falls within the site allocation, **it aligns with an area identified for green infrastructure on the site concept plan.** In addition, emerging Policy AS2 states:

“2) Proposals for the development must demonstrate:

- p) a layout that has land remaining undeveloped to the northern border of the site, that should be utilised for floodplain storage, protecting the physical boundary features on the site; and a layout where there is no built development within Flood Zones 2 and 3, other than essential and green infrastructure;*
- r) a layout and appropriate mitigation measures that protect: Culham Brake Site of Special Scientific Interest (SSSI) which lies to the north-west of the site; and priority habitats and species within and surrounding the site (including those to the north, those within Culham Campus, and south of Culham railway station);*
- s) how proposals would meet the biodiversity net gain requirement through a draft Biodiversity Gain Plan which is integrated into the entire masterplan, maximising the delivery of on site biodiversity through the creation of new woodland habitats along the river escarpment and ecological enhancements of the floodplain habitats, including a complex of new wetland habitats and species-rich floodplain meadows.”*

This position is also echoed in the adopted local plan for South Oxfordshire. Therefore, the identification of this area as having potential to become of particular importance to biodiversity aligns with, and is supported by, planning policy.

However, the area circled in red is identified in both the adopted and emerging local plans for development. The indicative concept plans show this area as being identified for a local centre, but the LNRS mapping shows this as an area with potential to become of particular importance to biodiversity, with the following potential measures (actions) identified:

- PM ID: 5: Improve existing neutral species rich grasslands using management to maintain and improve grasslands to support biodiversity.
- PM ID: 2: Create areas of neutral species rich grasslands in suitable locations.
- PM ID: 35: Create new woodland by planting trees (or enabling them to grow) in locations using tree species which are suited to the soil type and site conditions.
- PM ID: 52: Create new, varied ponds in suitable locations across all habitat types to increase biodiversity and amount of clean water habitats.

There might therefore be a conflict between the adopted and emerging local plans and the LNRS, although we note that the LNRS is not a constraint, but is rather about identifying opportunities, so it might be possible to achieve both with careful design and planning and the right specialist information.

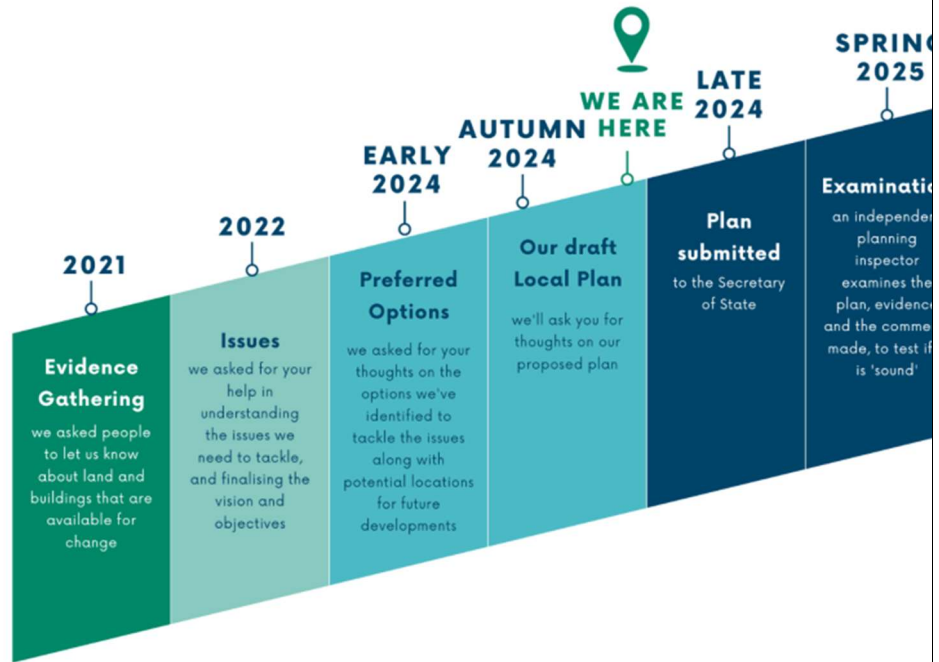
4.

Therefore, we suggest that in finalising the LNRS Local Habitat Map, **an exercise needs to be undertaken, working with the local planning authorities in Oxfordshire, to cross-check areas identified for development against the areas identified as having potential to become of particular importance to biodiversity.** It is important that a nuanced approach is taken, as, like the example of Land adjacent to Culham Campus shows, there is potential for local plan site allocations and the LNRS mapping to support each other, as well as the potential for conflicts.

Regarding LNRS and Joint Local Plan timelines and reference within:

Finally, our local plan for South and Vale will be the emerging Joint Local Plan, which is at an advanced stage. Both the Joint Local Plan and the LNRS are currently published for public comment, with the Joint Local Plan on the timeline below:

Here's a quick look at a timeline of the process to create our Joint Local Plan:



We understand the LNRS timeline is adoption in July 2025, which is likely to be during the examination of the Joint Local Plan. Once the LNRS is adopted there are a number of updates we could propose to the Inspector for consideration (at this stage modifications are in the hands of the Inspector rather than the councils). These include updates to Policy NH2 and its supporting text paragraph 12.16 to remove the reference to the Conservation Target Areas (the plan already refers to areas identified in the forthcoming LNRS). After adoption we could also consider changes to the Policies Map, replacing the CTAs with the LRNS mapping. For the next Local Plan we produce, it is likely that the role of the LNRS in land use planning will be further developed and established, for example the role of a LNRS in site selection and site design. If so, we will be able to use the LNRS to inform the development of the next local plan in a stronger way than we have this time, because of the timing.