

Greater Manchester Local Nature Recovery Strategy

Public Consultation Report: Greater Manchester Combined Authority Response to the Public Consultation



Contents

1. Introduction	3
2. Summary of responses	8
3. Responses not within remit and scope.....	10
4. Response to the consultation	14
5. Conclusion	39

1. Introduction

Local Nature Recovery Strategies

Introduced under the Environment Act 2021, Local Nature Recovery Strategies (LNRS) are a new, England-wide system of statutory spatial strategies that aim to establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits.

Every area of England will be covered by its own LNRS. The Mayor of Greater Manchester was named Responsible Authority for the preparation of a Greater Manchester LNRS in May 2023. The Greater Manchester Combined Authority (hereafter GMCA) has prepared the strategy on the Mayor's behalf. For more information on LNRS, please refer to the Government's policy paper on LNRS¹.

The LNRS has been developed to set out how we can all work together towards a greener city region where nature is thriving and where we need to focus our efforts to have the biggest impact. It is a strategic document, covering the ten local authorities in Greater Manchester. To prepare the strategy GMCA worked with stakeholders from across the city-region, including the Greater Manchester Ecology Unit (GMEU), Natural England, the ten GM local authorities, the Peak District National Park Authority and a large steering group of local organisations, as well as undertaking public surveys and events. This led to a formal public consultation on the draft strategy between November 2024 and January 2025. You can view the version of the strategy on which the GMCA consulted on the GMCA website².

¹ Defra (2023) Policy paper Local Nature Recovery Strategies, Available on the Defra website (external link): <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>

² GMCA Local Nature Recovery Strategy webpages, Available on the GMCA website: <https://www.greatermanchester-ca.gov.uk/what-we-do/environment/natural-environment/our-plan-for-nature-recovery/>

Why we were consulting

The public consultation was held to ensure that residents and stakeholders across Greater Manchester had the opportunity to shape the draft LNRS and for GMCA to understand levels of support for the aims, targets and priorities set out in the draft strategy. The responses and feedback collected through the public consultation have helped GMCA gain local knowledge and improve the strategy. The consultation also fulfils the statutory duty for a Responsible Authority to consult on its LNRS set out in The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023.

Structure of the consultation

The public consultation was open for 11 weeks from 15th November 2024 until 31st January 2025.

The consultation comprised three principal ways of providing feedback:

- Via a survey, available online (hosted on the GMCA's GM Consult webpage Citizen Space³) or hard copy, which asked both quantitative and qualitative questions about the written strategy document and the mapping.
- Via email, for more bespoke or detailed feedback.
- Via 10 in person drop-in sessions, with a session held at a venue in each of the respective 10 local authorities.

Information on the strategy and the public consultation was uploaded onto the GMCA webpages and promoted by partners. The public consultation was promoted via a mix of social media channels and partner promotion. Alongside the 10 local authority drop-in sessions, specific engagement events were also held to target certain sectors and audiences including: a youth engagement event, a business engagement event, a farmer and landowner engagement event, a water sector engagement event and a community engagement event.

³ GMCA Citizen Space, Available at: <https://www.gmconsult.org/>

The consultation survey provided a structured opportunity for respondents to provide feedback on the main components of the strategy document (including the aims, targets, priorities and Nature Network). Each of the main components of strategy had a group of questions, including quantitative and qualitative questions. The quantitative questions generally asked the respondent to indicate whether they agreed or disagreed with a component of the strategy, with responses options including strongly agree / agree / neither agree or disagree / disagree / strongly disagree / don't know. The quantitative questions were then followed up with a qualitative question, that asked the respondent to give reasoning for their response and to add further detail if they disagreed with a component of the strategy. A separate section was provided specifically for farmers, landowners and land managers on the advice of steering group members. Questions were also asked about respondents' views on the urgency of different aims, targets and priorities and whether the aims, targets and priorities set out in the strategy were clear and easy to understand.

Number of responses

In total GMCA received over 10,000 views or visits across all GMCA LNRS pages on our website and 427 responses to the public consultation (via the survey or via email).

How we analysed responses

The quantitative survey questions were used to ascertain general opinions of respondents on the key components in the strategy (including the aims, targets, priorities and maps). The qualitative questions were then used to understand more detail about the opinions of respondents on key components of the strategy. For the qualitative questions and email feedback, we read each response. Responses were then categorised in relation to each of the key components of the strategy. We then drew out common themes from the responses to ascertain common suggestions, concerns or issues being raised frequently. Common themes were linked to each of the different questions we asked, e.g. views on the headline aims in the strategy or views on the habitat or species priorities. Strategy wide common themes were also

noted. The common themes and issues identified were then used to inform the response below and amendments made to the strategy.

When deciding on changes to make to the strategy we considered the following factors:

- Whether the issue raised was within the **scope and remit of the strategy** (as set out under the Environment Act 2021 and through national LNRS guidance and regulations).
- Whether it was an issue that had **already been adequately covered** in another part of the strategy or under another habitat priority, or if the issue had been covered in the strategy but not been picked up by the respondent (*e.g. upland woodland cloughs are covered in upland priorities not woodland priorities*).
- Whether it was **appropriate level of detail** for the strategy (e.g. whether the issue being raised was of appropriate scale to cover in another strategy or would be better placed in supplementary documentation or a delivery plan).
- Whether it was an issue more appropriate for a **more detailed technical document** (*e.g. a technical standard or best practice document*).
- Whether it is a **delivery issue or mechanism** (*e.g. funding, skills or training*) and therefore could be better captured in a delivery plan or delivery options document, that can be updated more regularly than the LNRS.
- The **frequency of the response** – we received a lot of one-off requests to make a specific change to the strategy. We needed an indication that this was a clear area for improvement supported by multiple respondents in order to justify a change.
- Whether there was support for the change more broadly from our steering group and officer group (see main strategy for a list of organisations).

For responses relating to the maps of the Nature Network, including the core local nature sites and nature recovery opportunity areas, these included both general comments as well as specific requests for the addition of certain sites or areas, amendments and requests for removal of certain sites or areas. We considered each response for site addition or amendment individually and analysed whether a proposed addition or amendment should be accepted using a series of set criteria.

Requests for the removal of land from the Nature Network were considered against the criteria set out in the national LNRS guidance⁴ (paragraph 89), which states that *“if objections from landowners only become clear at public consultation, the responsible authority should try to accommodate their views where this does not undermine the coherence and ambition of the strategy as a whole”*. GMCA have therefore made decisions on requests for removals from landowners based on whether they would undermine the coherence and ambition of the strategy as a whole.

A list of sites recommended for addition, amends or removal were then sent to our local authorities for sign-off – if they were not approved by the relevant local authority then they were not able to be added, amended or removed from the Nature Network. Our local authorities are designated as Supporting Authorities for the preparation of LNRSs, this means that they are organisations that GMCA must engage with under the statutory guidance and regulations for LNRS and have the right to object to the publication of the strategy.

Purpose of this report

This document summarises the main responses received by the GMCA to the public consultation on the Draft Local Nature Recovery Strategy and the main amends made in response to these.

To read all the responses received by the GMCA please see the Public Consultation Report: Record of Responses Received.

⁴ Defra (2023) Local Nature Recovery Strategies statutory guidance - What a Local Nature Recovery Strategy should contain, Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1146160/Local_nature_recovery_strategy_statutory_guidance.pdf

2. Summary of responses

In total, GMCA received 427 responses to the public consultation (via the survey or via email). 82% of responses were from individuals, 15% from organisations and 3% other. 80% of respondents described themselves as private citizens, 2% as an elected councillor or officer holder, 2% as other and 15% did not provide details. Most organisations who responded to the consultation were community groups or registered charities. 93% of responses were received through the online consultation portal, 7% of responses were received via email or through hard copies posted to the GMCA.

The feedback received to the quantitative questions by the GMCA indicated that most respondents strongly agreed or agreed with the main components of the strategy as set out in the draft (the headline aims, headline targets, priorities, approach to mapping).

- 83% of respondents agreed or strongly agreed with the headline aims set out in the draft strategy.
- 72% of respondents agreed or strongly agreed with the headline targets set out in the draft strategy.
- 81% of respondents agreed or strongly agreed with the habitat priorities, averaged across all habitat types.
- 69% of respondents strongly agreed or agreed with the target species and species group set out for the strategy.
- 68% of respondents agreed with the use of the Lawton principles to identify opportunity areas for the Nature Network.

Further feedback was provided by respondents through qualitative questions for each of these components. Across these qualitative questions there were some common recurring themes.

- Concerns regarding the protection of nature and habitats or requests for more protection of land for nature.
- Concern regarding the impacts of development on nature and land use change, and the balance between nature and development.
- The importance of delivery and implementation of the strategy.

- The need for urgency and increased ambition.
- Requests for more details and clarity on various sections e.g. the targets.
- The need for better maintenance and management of existing habitats and nature-rich areas.

Some of this common feedback is outside of the scope and remit of an LNRS. The next section of this report outlines the remit and scope of an LNRS and explains the commonly raised feedback that was outside of this remit. Subsequent sections provide detailed feedback and actions we were able to take in relation to comments received.

Within this response report we have not sought to summarise our response to questions that related to views on urgency, delivery or action plans. For example, we asked questions related to how urgent respondents thought different priorities were, what actions respondents would be able to take towards priorities and the barriers and actions that farmers and landowners could take. These questions have not been summarised within this document as they will all be used to inform a future delivery plan or delivery options document and will be addressed by the GMCA through these documents rather than through changes to the strategy. You can view responses to these questions in the Public Consultation Report: Record of Responses Received, which details all responses to the public consultation.

3. Responses not within remit and scope

Across the 427 responses we received through the public consultation, there were a number of common responses that we are not able to act on in amending the strategy. This is because these responses requested actions that were not within the remit and scope of an LNRS, as set out under the Environment Act 2021, national guidance and regulations on the preparation of LNRS, non-statutory guidance on the preparation of LNRS and the National Planning Practice Guidance. While these comments have not been disregarded, the LNRS is not an appropriate vehicle at this time due to national policy and limitations placed on the scope and remit of LNRSs.

These common responses included:

- The addition of priorities and actions not directly related to habitat creation or improvement
- The protection of land for nature
- The prevention of development or other land use change
- The banning of certain products or prosecution of polluters
- Delivery and implementation

An explanation of the remit of the strategy is outlined below and corresponding areas we are not able to act on are also highlighted and explained.

Priorities and actions not directly related to habitat creation or improvement

Throughout the consultation responses we received there were suggestions for the addition of a wide range of different actions and priorities to the strategy. Many of these suggestions were helpful and were put forward to the LNRS steering group and officer group as amendments to the strategy.

However, some suggestions were outside the remit of the strategy, as set out in the statutory guidance and non-statutory guidance. The statutory guidance highlights that:

- Priorities and actions should be set out in terms of recovering or enhancing particular habitats or species to improve biodiversity, and achievable improvements to the wider natural environment through their conservation and enhancement.
- Most actions in LNRS should be ways of enhancing existing habitats and creating new habitats.
- Only a small number of potential actions which do not involve creating or improving habitats, but which are necessary to achieve a strategy priority, should be included.

This means that while the LNRS can propose priorities and actions, e.g. the creation and enhancement of habitat, or measures that would reduce pollution, it is not an 'action plan' to cover all actions for nature recovery. Actions that will not directly lead to habitat creation or improvement, for example - research and monitoring, education and awareness, skills, jobs and training or the improvement of cycling or walking infrastructure, while important, do not directly deliver habitat creation or enhancement. Therefore they are generally not within the scope for an LNRS under current guidance and regulations.

The GMCA strongly recognises the importance of these actions for nature recovery, particularly the role of skilled volunteers and species recorders. However, they do not fit within the primary remit of the national guidance on LNRSs and have, therefore, generally not been put forward as proposed amendments to the strategy. These actions can however feature within a future delivery options document or plan.

LNRS status in relation to planning and development

Throughout the consultation responses there were a range of requests for the strategy to prevent or ban development or planning applications in relation to certain sites or to reduce levels of development and house building in the city-region. These requests were outside the remit of LNRS for the following reasons.

Nationally, the government has made clear that LNRSs are not intended to act as a barrier to development, or place new restrictions on developing land or making land use changes. LNRSs are a guide or evidence base to inform Local Plans and decision making. Local Plans remain the mechanism by which local planning

authorities determine where and how land should be developed. Planning decisions at both the plan-making and planning application stage need to take into account all material considerations and the LNRS will be one consideration amongst many. Put simply, the LNRS will inform but not dictate planning decisions.

The Environment Act 2021 sets out that local planning authorities must have regard to this LNRS in their policies, including those in their Local Plans. The LNRS has been designed to help the 10 local planning authorities and the Peak District National Park Authority address priorities relating to the natural environment in such plans. This is aimed at better integrating these priorities alongside others that these plans must address (such as housing needs). It is the responsibility of local planning authorities to decide how they have regard for the LNRS in their Local Plans and when making planning decisions.

There are no powers provided under the Environment Act 2021, the LNRS statutory regulations or guidance that any proposed actions in the LNRS must be carried out. Instead LNRSs are intended to help public, private and voluntary sectors focus their nature recovery efforts for greater collective impact. This means that the LNRS cannot tell landowners or developers what to do on their land or change what land is currently allocated or used for. They are a piece of evidence that can be used to inform Local Plans and local decision making and potential options to focus nature recovery efforts for greater impact. Locations have been identified where nature recovery could take place, however that is not to say that other uses could not occur on this land when weighed up against other considerations.

The prevention of development is therefore outside of the remit of the LNRS.

LNRS and the protection of land

Throughout the consultation responses there were a range of requests for action in the strategy to protect land or preserve more land for nature. The Environment Act 2021, LNRS statutory regulations and guidance does not provide Responsible Authorities (including GMCA) with any powers that proposed actions in the LNRS must be carried out. Neither do they provide them with any new legal powers to formally, or otherwise, protect land for nature recovery through LNRS. This means that the LNRS cannot tell landowners or developers what to do on their land or

change what land is currently designated for. The Nature Network (areas mapped as part of the strategy either as Core Local Nature Sites or Nature Recovery Opportunity Areas) therefore cannot offer any new formal, or otherwise, protection. This can only be provided through statutory designations or local planning policy.

Instead, the purpose of the LNRS is to help public, private and voluntary sectors to focus their nature recovery efforts for greater collective impact, by directing action to where it is most needed and where it could deliver the greatest gains. Local authorities may choose to use the strategy to help identify land that should be set aside for the purposes of nature recovery but there is no requirement on them to do so. The strategy is there to offer direction and assist public bodies in meeting their duties relating to the recovery of nature. The strategy provides landowners with options for what they could do on their land – be it a public body, farmer or an individual – but it cannot tell people what to do or change what land is used or allocated for.

Throughout the document the term “safeguard” is used. In the context of this strategy, this does not imply a formal protection nor prevention of potentially impactful activities, unless already identified within an existing and adopted local plan or an already established legal protection.

LNRS status in relation to bans and prosecutions

Throughout the consultation responses there were a range of requests for the banning of certain products and request for legal action or prosecution of certain organisations. Both actions are outside of the remit and powers of LNRS. The banning of the use of certain products by the public and the prosecution of polluters is not within the remit of the strategy, as these powers were not given to Responsible Authorities under the Environment Act 2021 and rest with other statutory bodies.

LNRS delivery and implementation

Throughout the consultation responses there were a range of requests for the implementation and delivery of the strategy. The strategy is not a delivery plan, however GMCA have provided more information on delivery routes at the end of the strategy. A delivery options document or delivery plan will be produced to accompany the strategy over 2025-2026.

4. Response to the consultation

Headline aims

We asked respondents about the headline aims set out in the draft strategy. These were included as key takeaways for readers of the strategy, to focus attention on the big picture actions that we need to be taking.

You said:

There was positive feedback on the headline aims for the strategy, 83% of respondents agreed or strongly agreed with the aims we set out. This demonstrated that the headline aims set out in the strategy are well supported and are broadly the right ones. We also asked whether the vision and aims were clear and easy to understand, 83% of respondents stated that these were very clear or somewhat clear.

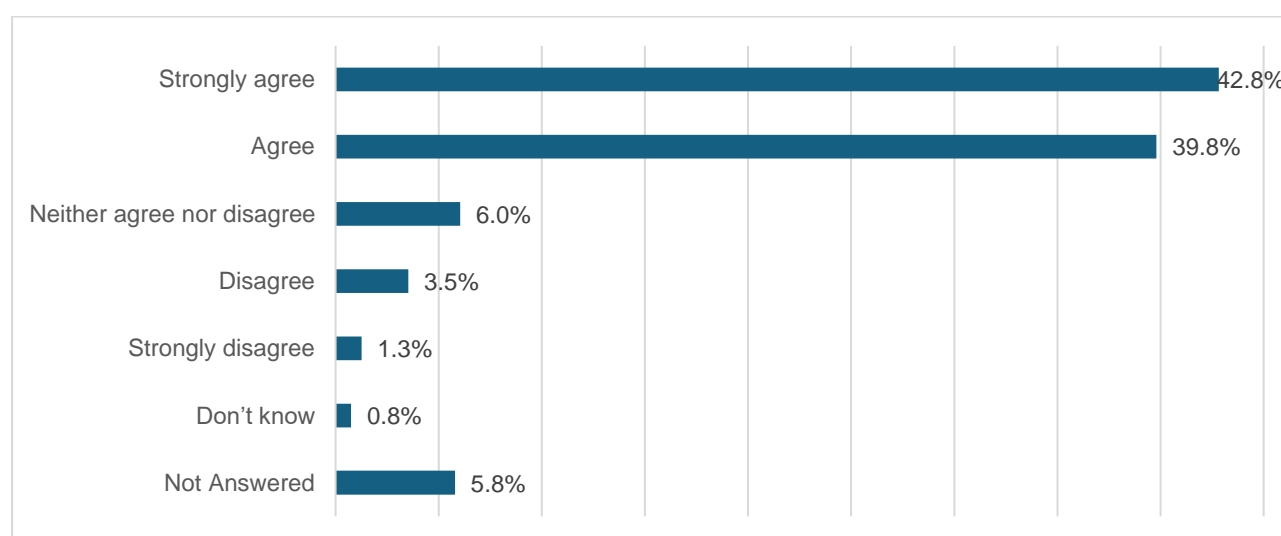


Figure 1 - Percentage of respondents agreeing or disagreeing with the headline aims.

As part of this question, there was also an opportunity for those who disagreed with the aims or wanted to provide further details or feedback to do so. In total there were 47 comments. You can read through the full responses we received in the responses report which accompanies this document.

Many of these 47 comments did not relate to specific changes to the headline aims, instead they were often broader comments or were more related to a specific component of the strategy or a niche issue not suitable as an amendment to a headline aim. Looking across the comments, the most common feedback received on the aims was not within the remit or scope of the LNRS (see section 3 for further information) as it related to:

- The need for more protection of nature.
- The impacts of development on nature and the need to prevent development.

For the reasons set out in section 3 it was not possible for GMCA to make amends to the strategy in relation to these comments.

There were also some other more frequent suggestions on how to improve upon the aims, including requests for:

- More focus on delivery and implementation.
- Need for urgency and increased ambition.
- Comments related to access to nature, with some respondents requesting more access to nature and other respondents concerned about the impact of recreational access upon nature.

Most other comments were one-off comments. There were also some technical comments on improving the structure and format of the aims.

We did:

We have made the following revisions to the strategy to respond to these comments.

- A new section has been added to the strategy to better clarify the legal remit and status of the LNRS, in relation to its planning status and the protection of nature.
- The existing sections in the strategy on delivery and implementation have been expanded to reflect the interest in delivery. However, the LNRS is a strategy not a delivery plan. A delivery options document or delivery plan will be produced separately over 2025-2026 to more fully respond to these comments.
- The format of the aims has been improved, and separated into aims on habitat creation or improvement and wider enabling activities. An additional enabling activity has been added on 'accelerating action – boost the pace and scale of

action for nature' to reflect comments on the need for more ambition and urgency.

- Reference to the need to enjoy nature responsibly has been added.

Headline targets

We asked respondents for their views on the headline targets set out in the draft strategy. These targets were included in the strategy as key outcomes to focus delivery efforts and relate to the headline aims.

You said:

There was positive feedback on the headline aims for the strategy. 72% of respondents agreed or strongly agreed with the draft targets in the LNRS and only 9% disagreed or strongly disagreed with the targets. This demonstrated that the headline targets set out in the draft strategy are well supported by the majority of respondents.

As part of this question there was also an opportunity for those who disagreed with the targets or wanted to provide further details or feedback to do so. In total there were 64 comments. You can read through the full responses we received in the response report which accompanies this document. Not all the comments we received related to specific changes to the targets, there were also broader comments and comments related to specific issues respondents were concerned by in relation to nature recovery.

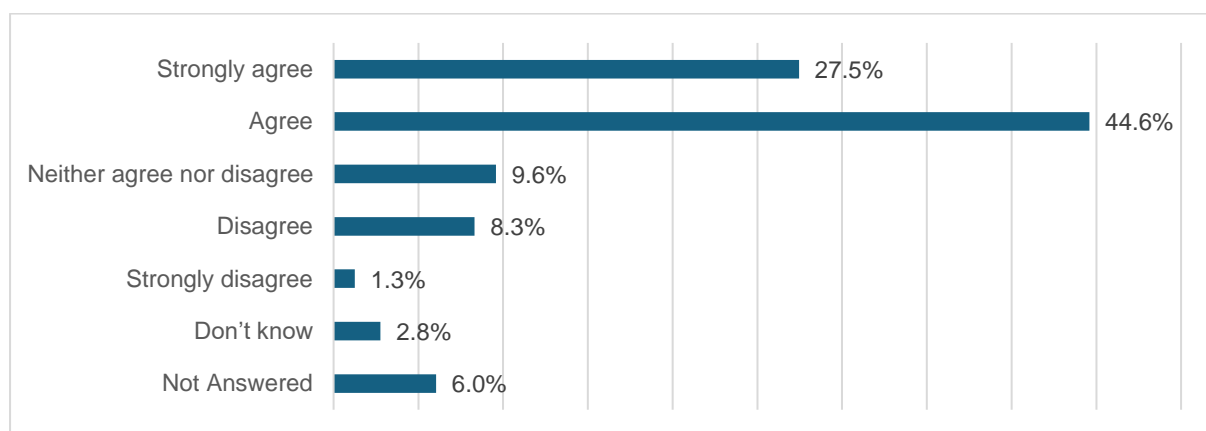


Figure 2 - Percentage of respondents agreeing or disagreeing that they are the right headline targets for Greater Manchester.

The most common feedback received on the targets included:

- Requests for the target to be made more ambitious (through for example stronger wording or more ambitious targets).
- Request for the greenspace targets to be improved or made more specific.

In addition to this feedback, the following comments were also noted:

- A number of comments related not to the targets but to a general concern regarding the balance between nature and development and the pressure on existing greenspaces for development; as this is not within the remit of the LNRS (see section 3) it has not been possible to take forward.
- Request for more detail and clarity as to how the targets were developed and how they will be monitored and reported on.
- The tree canopy target was of particular concern to some respondents, with both concern that tree planting should not be prioritised over other habitats and other requests for the target to be made more ambitious.

As part of the questions on targets we also asked respondents for their views on how we could specifically improve the access to green space target – setting out three different types of targets. The most popular target with 44% of respondents was one related to increasing the area of green space within a local area or local authority. In comparison, a target related to improving access to green space within a certain distance of where people live or work was less preferred with support from only 27% of respondents.

We did:

We have made the following revisions to the strategy to respond to these comments.

- A new appendix has been added to the strategy to explain each of the targets, how they relate to national targets set out in the national Environmental Improvement Plan and how we plan to monitor and report on them. The appendix also explains how they are ambitious for the city-region and the degree of action that they will require to achieve.

- The targets have been amended to show more clearly how they relate to each of the headline aims.
- Two of the targets around creation and connection have been condensed into one target, to make space for a new target on water quality.
- A new target has been added on water quality, agreed with United Utilities, and relating to the disconnection of areas of land draining into combined sewers to reduce number of spills from combined sewer overflows.
- The green space target has been revised to reflect feedback that the target needed to be clearer and more quantitative and based on preferences indicated by respondents for different types of targets. The revised target now focuses on achieving a consistent quantity of greenspace per 1,000 people in Greater Manchester, rather than on proximity to green space.
- The sites in active management target has been made more ambitious by expanding from just Local Wildlife Sites / Site of Biological Interest to include all designated and selected sites. This target now includes: Sites of Special Scientific Interest (encompassing also SACs and SPAs), National Nature Reserves and Local Nature Reserves.
- The tree planting target has been re-baselined using newly available national datasets but the ambition to increase tree canopy remains the same. This is based on advice from City of Trees on a realistic target and reflects the national ambition to increase overall national tree canopy cover as set out in the national Environmental Improvement Plan.

Habitat priorities

We asked respondents for their views on the habitat priorities set out in the draft strategy. Habitat priorities were included in the strategy to set out the key outcomes we all need to work towards to deliver nature recovery.

You said:

There was positive feedback on the habitat priorities for the strategy; 81% of respondents agreed or strongly agreed with the habitat priorities when averaged across all habitat types. This demonstrated that generally the habitat priorities set out in the strategy are well supported and are broadly the right ones.

Support for and comments on the priorities for each of the different habitat types are set out in more detail in the follow sections. Looking across these comments, it is evident that some of the feedback and suggestions for additional priorities and action for nature recovery are outside of the primary remit of an LNRS (as set out in section 3.). These were therefore not taken forward as proposed amendments or additions to the strategy and will be more suitable for an action plan or future delivery plan or delivery options document. Examples of those we were generally not able to take forward include: surveying and monitoring of wildlife populations, the need for new cycling and walking infrastructure, the provision of new public rights of way, volunteering, education and awareness, behavioural change and other similar issues. This is not to say that they are not all extremely important enabling actions for nature recovery. They just do not fit within the primary remit of the national guidance on priorities and actions for LNRS.

We did:

Common feedback on amends or additions, that were within the remit of the strategy, were taken forward to our LNRS Steering Group and Officer group for further feedback. These are detailed in the subsequent sections for each habitat type. Where the steering Group and Officer Group were happy with a proposed amendment or addition, they were taken forward by the GMCA.

To try to better address some of the suggested priorities that were not within the primary remit of a LNRS, we have expanded the section on enabling factors in the delivery section of the strategy. This section now better acknowledges some of the common suggestions for additional priorities as enabling factors for nature recovery, such as funding, collaboration and partnership, volunteers and communities, skills and capacity, recording and monitoring, behavioural change and integration.

Urban green spaces and buildings priorities

We asked respondents for their views on the priorities for urban green spaces and buildings set out in the draft LNRS.

You said:

There was positive feedback on the priorities for urban green spaces and buildings set out in the draft LNRS, 80% of respondents agreed or strongly agreed with these priorities and only 4.5% disagreed or strongly disagreed. This demonstrated that the priorities for urban green spaces and buildings set out in the draft strategy are well supported by the majority of respondents.

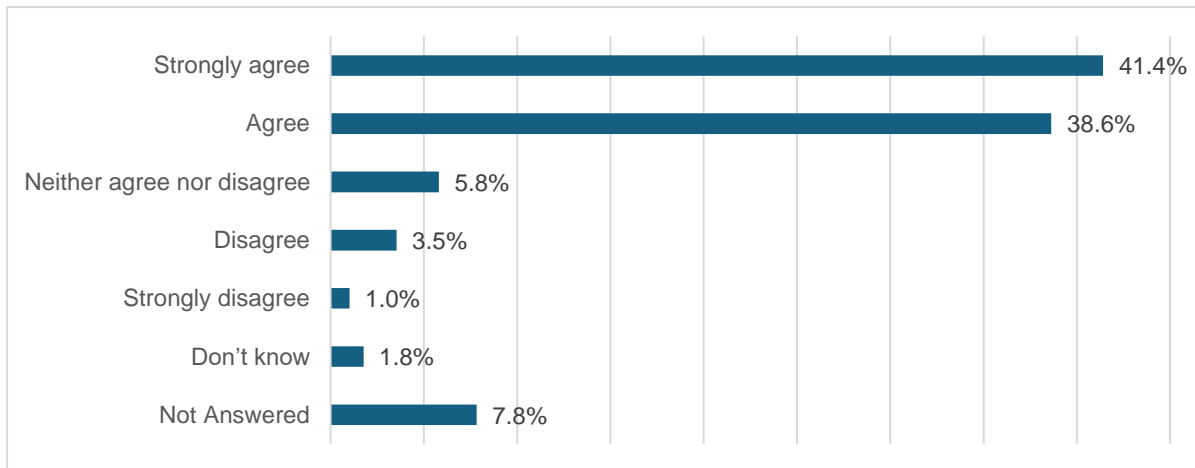


Figure 3 - Percentage of respondents agreeing or disagreeing with the urban green space and buildings priorities.

As part of this question, there was also an opportunity for those who disagreed with these priorities to provide further details or feedback. In total there were 44 comments on the urban green space and buildings priorities. You can read through the full responses we received in the response report which accompanies this document.

The most common feedback received included:

- The need for new development or regeneration to be more wildlife friendly and to embed nature recovery in urban areas.
- Requests for more emphasis on the creation of nature-rich greenspaces, with a particular emphasis on wilder spaces for nature and the creation of wildflower areas.
- Improved cycle and walking routes or improved access to green spaces; as this is not within the remit of the LNRS (see section 3) it has not been taken forward.

There was also a range of less frequent comments, including:

- Request for more protection of urban nature and green spaces, through the retention of existing greenspaces and important industrial brownfield land; as this is not within the remit of the LNRS (see section 3) it has not been taken forward.
- Request for more emphasis on wildlife-friendly gardens, with a particular focus on improving the value of gardens for hedgehogs and small birds.
- Request for more emphasis on improved connectivity for wildlife across urban spaces.
- Request for more reference to swift bricks.

We did:

- Added more emphasis on connectivity to the introductory narrative and a new action has been added to each of the urban priorities to encourage action on connectivity in urban areas.
- More consistent mention has been made of the need for nature-rich green spaces in the priorities and a clearer definition of urban green spaces has been provided.
- Many of the remaining comments were already well covered by the priorities and actions (for example we already have a priority on town and city centre urban regeneration) or had been covered in the technical guidance on the habitat priorities and actions (see appendix 7) that accompanies the strategy (e.g. swift bricks), rather than in the main text of the strategy. We have added more references to this technical guidance throughout the strategy and will highlight it further when promoting the published strategy.

Woodland, trees, scrub and hedgerow priorities

We asked respondents for their views on the priorities for woodlands, trees, scrub and hedgerows set out in the draft LNRS.

You said:

There was positive feedback on the priorities for woodland, trees, scrub and hedgerow priorities set out in the draft LNRS. 84% of respondents agreed or strongly agreed with these priorities and only 4% disagreed or strongly disagreed. This

demonstrated that the woodland, trees, scrub and hedgerow priorities set out in the draft strategy are well supported by the majority of respondents.

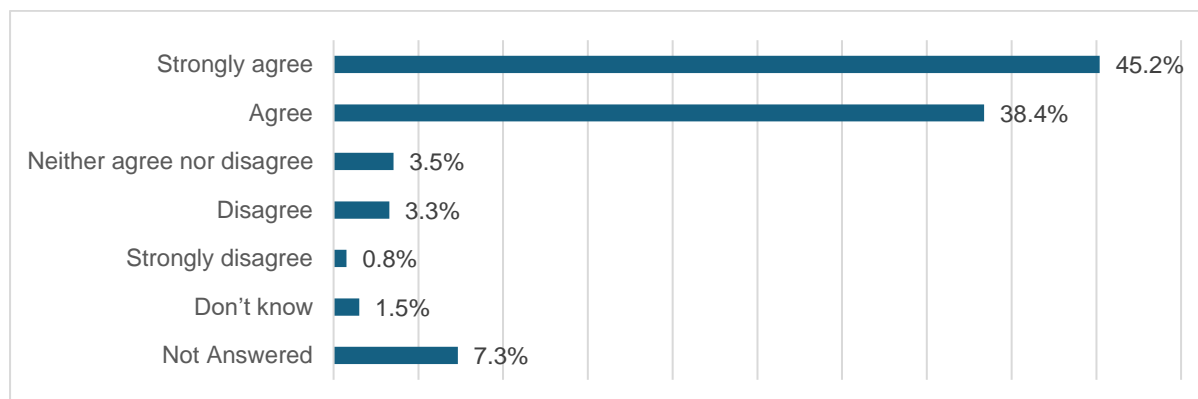


Figure 4 - Percentage of respondents agreeing or disagreeing with the woodland, trees, scrub and hedgerow priorities.

As part of this question, there was also an opportunity for those who disagreed with these priorities or wanted to provide further feedback to do so. In total there were 38 comments on the woodland, trees, scrub and hedgerow priorities. Not all of these comments related to specific changes to these priorities but were also broader comments. You can read through the full responses we received in the response report which accompanies this document.

The most common feedback received included:

- Requests for more safeguarding of woodland, ancient woodlands, trees, scrub and hedgerow habitats. As the protection of additional land for nature is not within the remit or powers of LNRS (see section 3) it has not been possible to take this forward beyond what is already stated in the strategy.
- Respondents were concerned about the loss of woodlands, trees, hedgerow habitats to development, including concerns about specific development sites. As the prevention of development is outside of the remit and the powers of the LNRS (see section 3) it has not been possible to take forward these comments beyond what has already been included in the strategy.
- Respondents also highlighted the importance of better woodland, tree and hedgerow management, including specific comments about the importance of

addressing existing poorly managed woodlands and ensuring newly planted woodlands are well managed.

There was also a range of less frequent comments, including:

- Concerns regarding the planting of new woodlands impacting other habitats.
- Loss of trees, hedgerow and scrub from private gardens.
- The importance of connectivity.

We did:

- Amendments have been made to the wording of the priorities and actions to better recognise the need for positive woodland management and additional examples and details have been added to the technical guidance.
- Explicit reference has been made to the impact that woodland establishment or creation can have, in some instances, on other habitats in the introduction to the woodland priorities.
- Many of the other comments had already been covered in different parts of the strategy or had been covered in the technical guidance on the habitat priorities and actions (appendix 7) that accompanies the strategy, rather than in the main text of the strategy. We have added more references to this technical guidance throughout the strategy and will highlight it further when promoting the published strategy.

Rivers, canals and waterbodies priorities

We asked respondents for their views on the priorities for rivers, canals and waterbodies set out in the draft LNRS.

You said:

There was positive feedback on the priorities for rivers, canals and waterbodies set out in the draft LNRS. 82% of respondents agreed or strongly agreed with these priorities and only 4% disagreed or strongly disagreed. This demonstrated that rivers, canals and waterbodies priorities set out in the draft strategy are well supported by the majority of respondents.

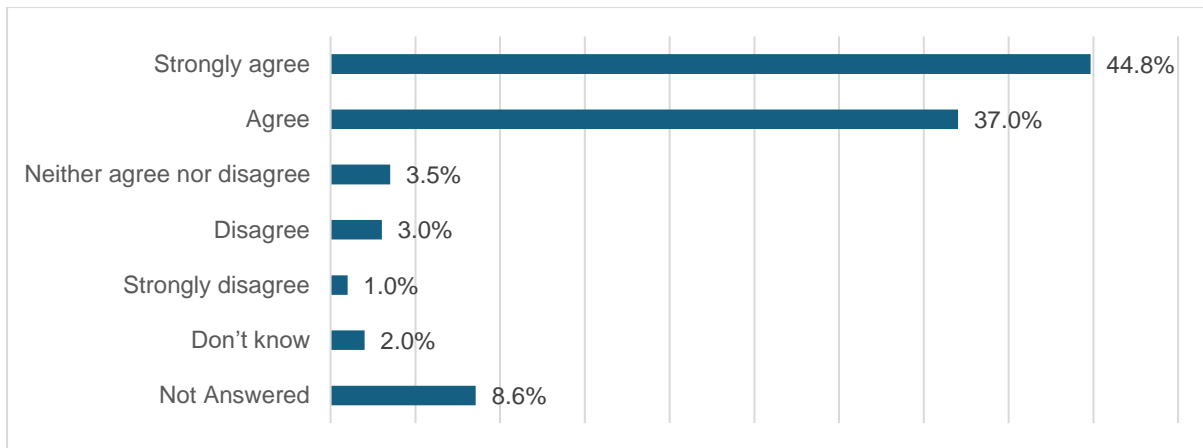


Figure 5- Percentage of respondents agreeing or disagreeing with the rivers, canals and waterbodies priorities.

As part of this question, there was also an opportunity for those who disagreed with these priorities or wanted to provide further feedback to do so. In total there were 32 comments on the rivers, canals and waterbodies priorities. You can read through the full responses we received in the response report which accompanies this document.

GMCA also found that general feedback on rivers, canals and waterbodies priorities was given as responses to other consultation question requesting feedback on the map of rivers, canals and waterbodies opportunity areas. All of this feedback has been combined to understand the most common responses.

The most common feedback included:

- Concern regarding the pollution of our waterbodies, the importance of addressing urban and rural water pollution and achieving cleaner water conditions.
- Respondents highlighting the need for better maintenance, restoration and enhance of these habitats.

Other less frequent issues highlighted included:

- The need for more barrier removal and daylighting of rivers.
- The request for emphasis on flood defence and the role of natural flood management.
- Concerns around invasive species with requests for greater emphasis on managing these along and in our waterbodies.

We did:

- To respond to the concern raised regarding pollution we have added in a new headline target on reducing spills from combined sewer overflows by disconnecting land from the drainage network. Although, combined sewer overflows are only one factor influencing poor water quality, it is one that we can measure and report progress on. We also added a dedicated priority on water quality, rather than having this combined with the natural management and enhancement of waterbodies.
- We have revised and amended one of our existing priorities, so that this is more focused on maintenance, restoration and enhancement of rivers, canals and waterbodies, and emphasised the need for these to be well managed. We have added in further technical details into our technical appendix.
- We have checked and amended the wording on an existing action to ensure that it explicitly references the daylighting of rivers.
- We have ensured that there is clear reference to the need for natural flood management in the introduction and that this issue is also covered in a dedicated priority.
- We have added in reference to the need to tackle high impact invasive species to our principles for habitat creation, enhancement and restoration. These principles apply to all our habitat priorities but, as high-impact invasive species impact many different habitat types across the city-region, reference to them is best placed in the habitat principles rather than as an action under every habitat type.

Lowland mosslands and wetlands priorities

We asked respondents for their views on the priorities for lowland mosslands and wetland priorities set out in the draft LNRS.

You said:

There was positive feedback on the priorities for lowland mosslands and wetland set out in the draft LNRS. 78% of respondents agreed or strongly agreed with these priorities and only 2.8% disagreed or strongly disagreed. This demonstrated that the

lowland mosslands and wetlands priorities set out in the draft strategy are well supported by the majority of respondents.

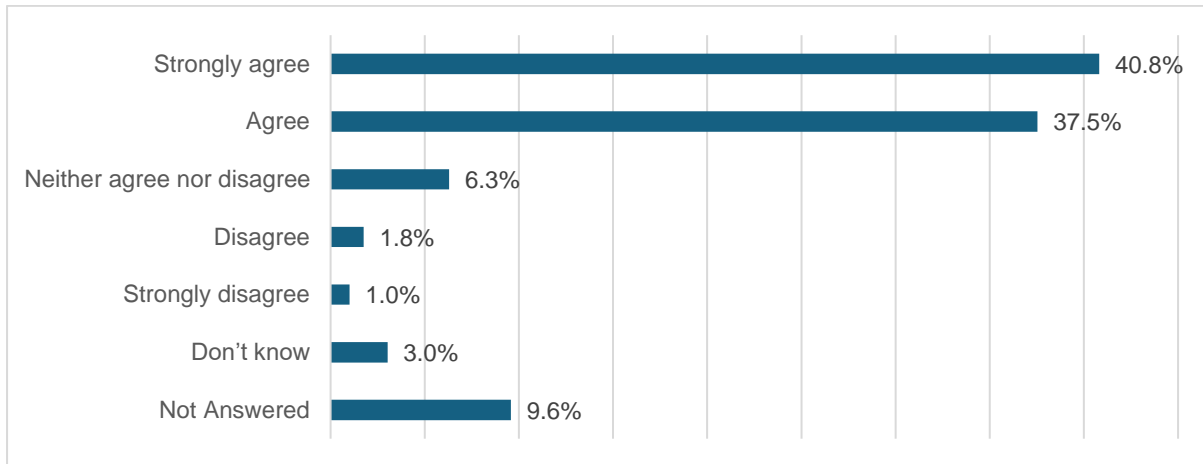


Figure 6- Percentage of respondents agreeing or disagreeing with the lowland mosslands and wetland priorities.

As part of this question, there was also an opportunity for those who disagreed with these priorities or wanted to provide further feedback to do so. Very few respondents provided comments or feedback on the lowland wetland and mossland priorities; in total there were only 19 comments. You can read through the full responses we received in the response report which accompanies this document.

GMCA also found that general feedback on lowland wetland and mosslands priorities was given as responses to other consultation question requesting feedback on the map of lowland wetland and mosslands opportunity areas. All of this feedback has been combined to understand the most common responses.

The most common feedback included:

- Request for more emphasis on protecting and safeguarding lowland raised bog or more generally around preventing development on wetlands and mossland sites. As the protection of land for nature is not within the remit or powers of LNRS (see section 3) it has not been possible to take this forward beyond what is already stated in the strategy.
- Respondents wanted to see more emphasis on the maintenance and management of existing areas.

- Request for more emphasis on the extension of small and isolated sites and the linking of these sites to existing sites.
- The importance of restoring or creating more lowland mossland and wetlands, for nature but also for carbon capture and flood mitigation benefits.
- Request for more emphasis on the role of lowland mosslands and wetlands role in flood protection, or flood protection measures more generally. For example, the role of wetlands in soaking up rainfall.

We did:

- Reference to the need to not just enhance and manage but also maintain existing and remnant areas of lowland raised bog, fen and other wetland habitats has been added into the actions for lowland wetlands and mosslands.
- Additional text has been added to the introduction to further recognise of the role of lowland mossland and wetlands in sequestering carbon and reducing flood risk.
- Additional text has been added to the introductory narrative for the section on lowland wetlands and mosslands to highlight small and isolated sites.

Grassland, farmland and lowland heath priorities

We asked respondents for their views on the priorities for grassland, farmland and lowland heath priorities set out in the draft LNRS.

You said:

There was positive feedback on the priorities for grassland, farmland and lowland heath set out in the draft LNRS. 82% of respondents agreed or strongly agreed with these priorities and only 2.5% disagreed or strongly disagreed. This demonstrated that the priorities for grassland, farmland and lowland heath set out in the draft strategy are well supported by the majority of respondents.

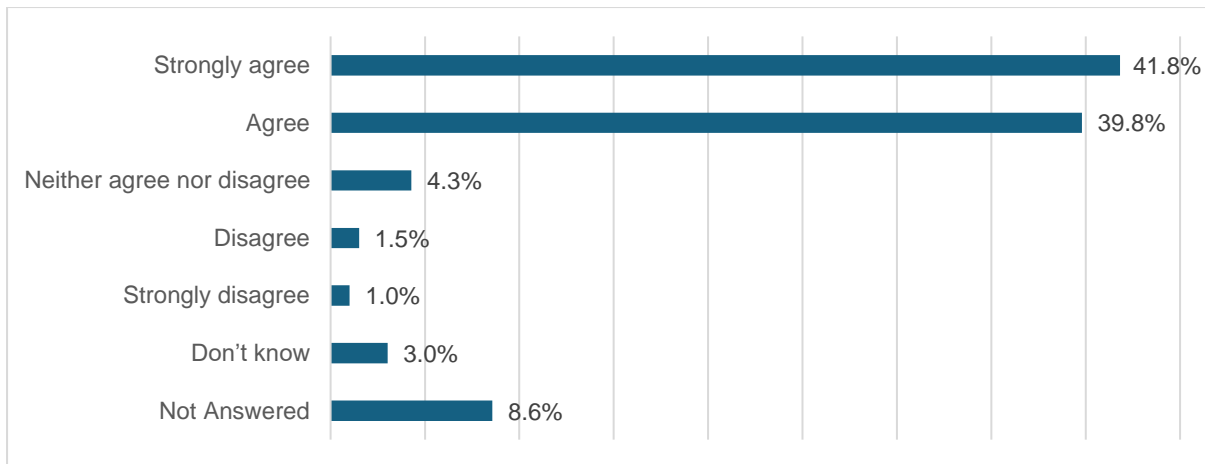


Figure 7 - Percentage of respondents agreeing or disagreeing with the grassland, farmland and lowland heath priorities.

As part of this question, there was also an opportunity for those who disagreed with these priorities or wanted to provide further feedback to do so. In total there were 28 comments on the grassland, farmland and lowland heath priorities. You can read through the full responses we received in the response report which accompanies this document.

GMCA also found that general feedback on the grassland, farmland and lowland heath priorities was given as responses to other consultation question requesting feedback on the map of grassland, farmland and lowland heath opportunity areas. All of this feedback has been combined to understand the most common responses.

The most common feedback included:

- Concerns about development negatively impacting grasslands or causing the loss of species-rich grassland habitats. As the protection of land for nature and the prevention of development is not within the remit or powers of LNRS (see section 3) it has not been possible to take this forward beyond what is already stated in the strategy.
- The importance of farmers and farmland for the delivery of these priorities and the need to collaborate with farmers, and suggestions of specific actions e.g. adding hedgerows, reducing pollution or rewilding areas.
- The impacts on nature caused by farming.

- Concerns over the impact on farm businesses and the need to avoid loss of agricultural land.

We did:

- More recognition has been added into the introductory section to recognise that much of this land is intensively managed.
- Reference to the need to work alongside farm businesses has been added.
- The actions have been checked to ensure they cover all suggested specific actions - a new action on hedgerows has been added.
- Sections on the importance of working with farmers and farmland have been expanded in the delivery section of the strategy.

Upland moorlands priorities

We asked respondents for their views on the upland moorland priorities set out in the draft LNRS.

You said:

There was positive feedback on the priorities for upland moorlands set out in the draft LNRS. 78% of respondents agreed or strongly agreed with these priorities and only 2% disagreed or strongly disagreed. This demonstrated that the upland moorland priorities set out in the draft strategy are well supported by the majority of respondents.

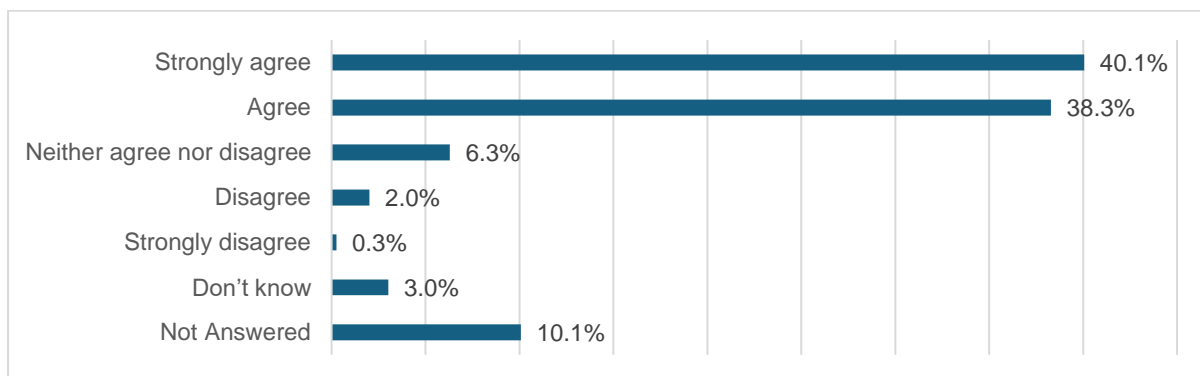


Figure 8- Percentage of respondents agreeing or disagreeing with the upland moorland priorities.

As part of this question, there was also an opportunity for those who disagreed with these priorities or wanted to provide further feedback to do so. In total there were 16 comments on the upland moorland priorities. You can read through the full responses we received in the response report which accompanies this document.

GMCA also found that general feedback on the upland moorland priorities was given as responses to another consultation question requesting feedback on the map of upland moorland opportunity areas. All of this feedback has been combined to understand the most common responses.

The most common feedback included:

- There was both support and concerns about tree and woodland planting in the uplands.
- The importance of working with landowners to improve outcomes for nature recovery.
- The importance of restoration for these habitats.
- The need for more management and maintenance of these habitats.
- The importance of these habitats for flood risk management and the need to enhance these functions.

We did:

- Reference has been added to the introductory section to emphasise the need to work collaboratively with upland landowners and managers and their role in delivering benefits for nature.
- Further references have been added for the need for tree planting or establishment in the uplands to be undertaken carefully. The principle of ‘right habitat, right place, right reason’ is also recognised in the habitat principles which cover all of the priorities.
- Checks have been made to ensure that there are references to the role of uplands in reducing flood risk in the introductory narrative and the priorities.
- Checks have been made to ensure that the restoration of these habitats is covered in the upland moorland priorities and actions.
- Options for maintenance and management of these habitats have been added into the technical appendix for these actions.

Species priorities

We asked respondents for their views on the species priorities set out in the draft strategy. Whilst many species across Greater Manchester are declining, species priorities were set out in the LNRS to recognise that some species and groups of species are particularly vulnerable and at risk locally, needing bespoke action beyond wider habitat priorities set out in this strategy. Under national guidance, LNRSs can set out a manageable list of target species and species groups for focused attention to help these species bounce back and avoid local species loss.

You said:

69% of respondents strongly agreed or agreed with the species and species group priorities set out for the strategy. This demonstrated that priorities for species and species groups set out for the strategy are supported by the majority of respondents.

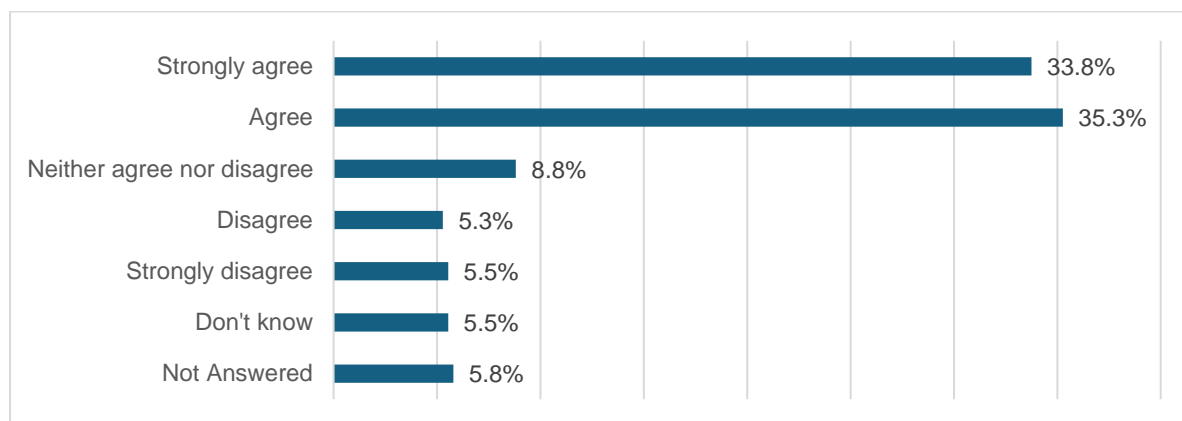


Figure 9 - Percentage of respondents agreeing or disagreeing with the priorities for species and species groups for Greater Manchester.

As part of this question, there was also an opportunity for those who disagreed with these priorities or wanted to provide further feedback to do so. In total there were 69 comments on the species and species group priorities. You can read through the full responses we received in the response report which accompanies this document.

The most common feedback included:

- Requests for more reference to, consideration of, or more inclusion of, the 424 'long listed species' identified as part of the process of selecting the 16 target species and species groups.
- Requests for all 424 long listed species to be assessed when reviewing the effectiveness of the LNRS.
- Requests for the addition of a wide range of different species to the species and species groups priorities. The most popular request for the addition was for bats, but there were also many other individual requests such as: kingfishers, herons, otters, swifts, hen harrier, newts, beavers, red squirrel and many others.
- There was evidence of confusion between the difference between LNRS priority species and existing protected species list often referred to as section 41 species.
- There was also concern about the lack of inclusion of all nationally protected species.
- There was also concern around lack of mention of invasive species.
- There was some disagreement with the selected target species and species groups priorities, for various reasons, but no clear common agreement among multiple respondents that a particular species or species group should be removed. Instead, there were only individual responses querying the inclusion of certain species such as waxcaps, mountain hare or Asian hornet.

We did:

To respond to the comments received:

- We have more fully explained the process that was undertaken to select the 16 target species and species groups and the role of the long-listed species in this process, both in the main text of the strategy and the methodological statement (appendix 2). The structured approach that we have followed explains why it is not possible for us to accommodate individual requests for additional species to be added to this list.
- In relation to references to the long-listed species, following the national regulations and guidance, the target species in the LNRS were primarily intended to produce a manageable list of species for targeted action. The non-statutory LNRS guidance provided by Natural England highlights that Responsible

Authorities should select from a pool of potential priorities a combination of assemblages and individual species to form the species priorities list (which GMCA have referred to as target species) and that Responsible Authorities are strongly advised to make this list short and manageable. To highlight the long-listed species, we have clarified the wording in the species section and we have added in the long listed 424 vulnerable species, identified as part of the target species selection process, as an appendix to the strategy.

- There seemed to have been some confusion about the status of the long-listed species in the process. The approach to the selection of the 16 target species and species group follows the requirements set out in the non-statutory guidance provided by Natural England for the identification of “***a species priorities list should comprise a manageable number of deliverable species priorities, which may be individual species or species assemblage***”. The approach taken by GMCA to identify a manageable list of 16 species and species groups echoes the approach also taken for all other Responsible Authorities in the North West. This has been clarified in the strategy and reference to the importance of the long-listed species in this process has been made.
- As neither GMCA nor GMEU have the capacity to monitor or assess all 424 long listed species when reviewing the effectiveness of the LNRS due to limitation in staff time and resources we have not been able to commit to this in the strategy. There are instead a number of headline targets set out for monitoring in the strategy. The monitoring of species is not something that is currently required of Responsible Authorities under statutory regulations and guidance for LNRS.
- To better distinguish species and species group priorities from national priority species or species of principal importance, we have renamed these as ‘LNRS target species and species groups’. This reflects terminology beginning to be used by other Responsible Authorities in the North West, such as Lancashire.
- The LNRS target species and species groups are not intended to replicate existing protected species lists, national priorities species or species of principal importance or Biodiversity Action Plan species – these lists already exist and remain unchanged by the publication of the LNRS. The LNRS target species and species are local list of species requiring focused attention. This has been clarified in the main text of the strategy.

Nature network

We asked respondents for their views on the approach we had taken to the mapping of the Nature Network based on the Lawton Principles, as well as their specific views and feedback on the Nature Network maps when they were split out to show opportunity areas identified for different habitat types e.g. woodlands, grasslands, uplands etc.

You said:

There was positive feedback on the approach taken to the mapping of the Nature Network with 68% of respondents agreeing with the use of the Lawton principles to identify opportunity areas for nature recovery. Notably 24% of respondents did not answer this question. This response demonstrated that the approach taken to the mapping was generally supported by the majority of respondents but some respondents felt unable to respond to this question.

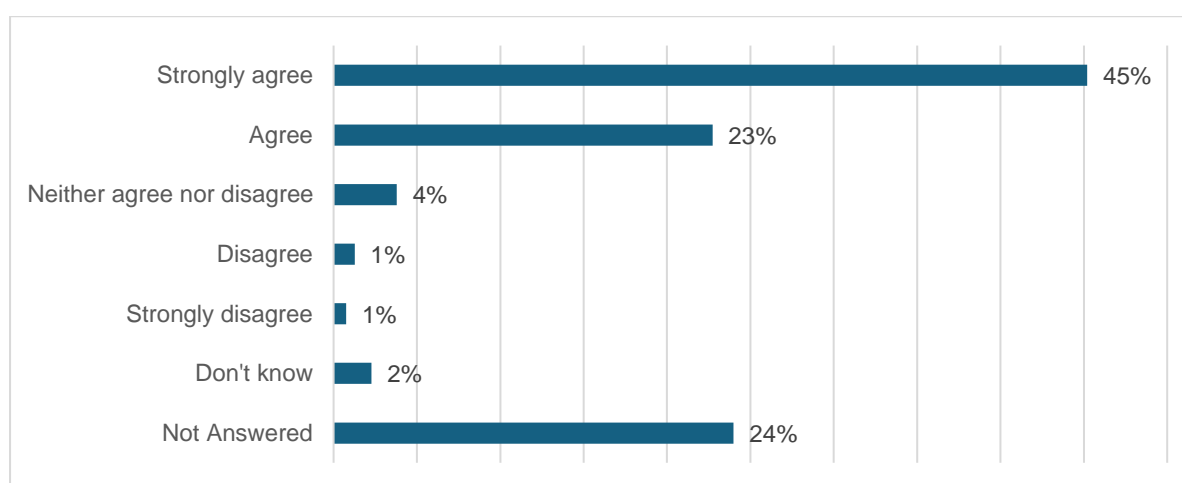


Figure 10 - Percentage of respondents agreeing or disagreeing with the use of the Lawton principles to identify Opportunity Areas for nature recovery.

We asked for views and feedback on not just the approach taken but also each of the different habitat maps, which together form the Nature Network, with a separate question for each of the 5 habitat maps: (a) woodlands, trees, scrub and hedgerows

(b) grasslands, farmlands and lowland heath, (c) rivers, waterbodies and canals, (d) lowland wetlands and mossland and (e) upland moorlands.

Across all of these questions the common feedback we received was as follows:

- Requests for the additions of individual sites and specific areas to the Nature Network.
- Requests for the addition of large areas to the Nature Network, for example the moorlands near Bolton or large areas of mosslands.
- Requests for the addition of individual sites and specific areas that have been identified for development or have a live planning application or concern regarding the exclusion or perceived exclusion of a site due to possible future development or a planning application.
- General (non-site specific) requests for the addition of more areas to the Nature Network in urban centres (e.g. Manchester and Salford city centres).
- General (non-site specific) requests for the addition of more opportunities for connectivity to be added to the Nature Network over large areas (e.g. Stockport as well as other examples).
- Requests for the removal of land from the Nature Network (for example where it is planned for development, operational land or land used for industry).
- Concern that the Nature Network does not cover all small green spaces, for example local greenspaces like school grounds, cemeteries, small woodlands etc.
- Site specific corrections on the wrong actions being assigned to a site within the Nature Network (e.g. a grassland action proposed in a location where respondents' views were that a woodland action would be more appropriate).
- Concerns regarding the impact of the Nature Network on other land uses e.g. sports, recreation or playing spaces, heritage, agriculture, development.
- Concern about development and lack of protection of the Nature Network from changes in land use.

We did:

- All individual site-specific requests for the addition of land were assessed against a series of set criteria to determine whether they should be added to the Nature Network. These criteria and the process followed by GMCA to assess each

suggestion are set out in figure 11 below. This process resulted in the addition of 105 areas of land or sites to the Nature Network. GMCA also found that many requests for site additions were for land already within the Nature Network; no further action or additions were therefore made for these sites.

- Requests for the addition of sites to the map of core local nature sites were only made where a site met one of the categories set out in statutory and non-statutory guidance by Defra (a designated or scheduled site or an irreplaceable habitat as defined by the 2024 Biodiversity Net Gain regulations). The categories for inclusion of land as a core local nature sites have been clarified in the main text of the strategy.
- To maintain a strategic, prioritised and coherent approach to the Nature Network that focuses on enhancing connectivity between core local nature sites, requests for the addition of very large areas of land to the Nature Network were generally rejected or smaller areas of land within these large areas were accepted instead where they aligned with the Nature Network.
- Requests for the addition of land or specific sites on the basis that they were identified for development, potentially would be developed or had planning permission were also assessed through the process set out in figure 11. As the Nature Network is not a barrier to development or any change in land use, the inclusion of land in the Nature Network solely on this basis was not deemed appropriate. Additional text on the remit and legal status of the Nature Network has been included in the main text of the strategy to clarify this. If the land request for addition was already permissioned or under construction, then requests were generally rejected as unfeasible, as set out in the process in figure 11.
- The purpose of the Nature Network is to set out prioritised areas to build strategic connectivity for nature recovery across the city region. As there were minimal opportunities to build connectivity across the city-centre, due to restricted availability of land, it was not appropriate to add in more land across these deeply urban areas. Instead, the urban actions set out for the strategy (e.g. urban street trees) should be pursued across all urban areas. The need for urban priorities and actions to be carried out in multiple locations has been clarified in the main text of the strategy. Additional emphasis has been placed on the need to deliver

urban actions across all urban areas and particularly in locations lacking green space and facing other challenges.

- As a prioritised approach to identifying key areas to build connectivity had already been undertaken in developing the Nature Network using Linkage Mapper (see appendix 2 of the strategy), requests for the addition of more connectivity opportunities areas to be added to the network or very small greenspaces were generally not taken forward as they were not deemed strategically important. In future reviews of the strategy these areas could be revisited. We have generally not endeavoured to include every area in the nature recovery opportunity areas – as the Nature Network is intended to show suggested locations for prioritised action over the next 10 years.
- Requests for the removal of land from the Nature Network were assessed against the criteria set out in the statutory guidance (paragraph 89) which highlights that *“the responsible authority should try to accommodate their [landowner] views where this does not undermine the coherence and ambition of the strategy as a whole”*. GMCA therefore assessed each removal request from a landowner as to whether it would undermine the coherence and ambitions of the strategy as a whole and accepted 14 requests for removals or partial removals.
- Site specific corrections of the wrong actions were checked and taken forward wherever possible.
- Additional text has been added to the main strategy to confirm the LNRS’ legal status and remit in relation to planning permission, development, land use change and other land uses. Locations have been identified in the Nature Network where nature recovery could best take place, however that is not to say that other uses could not occur on this land and the LNRS does not in any way affect or impact upon the current use of land and the need to follow existing processes and guidance.

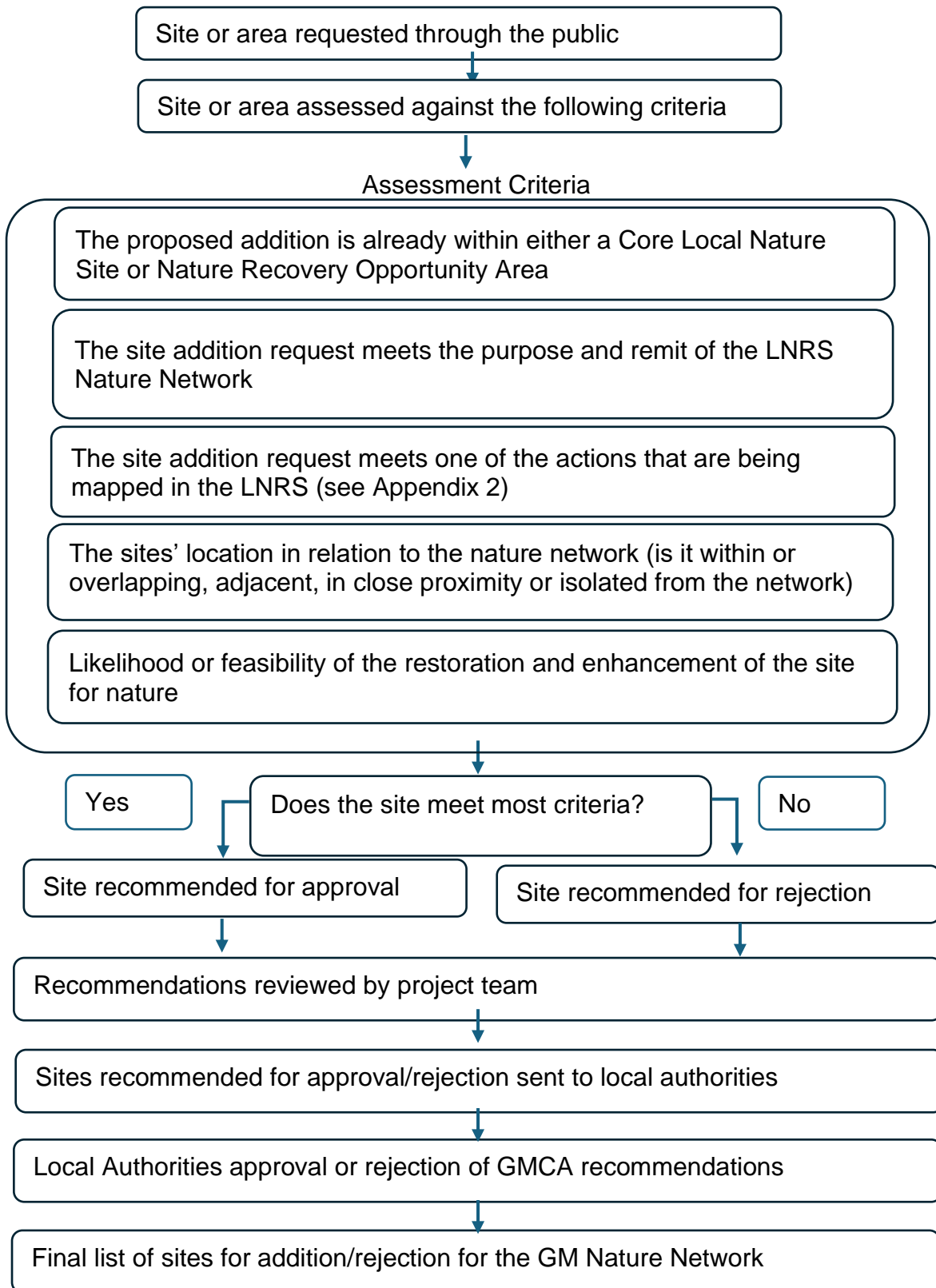


Figure 11. Assessment process for considering whether a site or area of land should be added to the Nature Network

5. Conclusion

The interest and involvement generated through the public consultation on the draft of the first Local Nature Recovery Strategy has been greatly welcomed. The responses received have provided valuable insights, information, and suggestions, many of which have been integrated into the draft publication. The amendments and alterations that have been made to the Local Nature Recovery Strategy have led to a stronger, more inclusive and improved strategy. We can now move towards the next stage of delivery of the actions to support nature recovery and ensure that plays a valuable and important part in responding to the biodiversity emergency.