



Committee: COUNCIL BUSINESS COMMITTEE

Date: THURSDAY, 31 JULY 2025

Venue: MORECAMBE TOWN HALL

Time: 6.00 P.M.

A G E N D A

1. **Apologies for Absence**
2. **Items of urgent business authorised by the Chair**
3. **Declarations of Interest**

To receive declarations by Councillors of interests in respect of items on this Agenda.

Councillors are reminded that, in accordance with the Localism Act 2011, they are required to declare any disclosable pecuniary interests which have not already been declared in the Council's Register of Interests. (It is a criminal offence not to declare a disclosable pecuniary interest either in the Register or at the meeting).

Whilst not a legal requirement, in accordance with Council Procedure Rule 9 and in the interests of clarity and transparency, Councillors should declare any disclosable pecuniary interests which they have already declared in the Register, at this point in the meeting.

In accordance with Part B Section 2 of the Code Of Conduct, Councillors are required to declare the existence and nature of any other interests as defined in paragraphs 8(1) or 9(2) of the Code of Conduct.

4. **Response to the Fair Funding Review 2.0 Consultation (Pages 3 - 15)**

Report of the Chief Finance Officer.

Published 30 July 2025

5. **Consultation on the Lancashire Local Nature Recovery Strategy (Pages 16 - 40)**

Report of Chief Officer – Planning and Climate Change

ADMINISTRATIVE ARRANGEMENTS

(i) Membership

Councillors Ross Hunter (Chair), Paul Newton (Vice-Chair), David Whitaker, Suhir Abuhajar, Sarah McGowan, Abi Mills and Jean Parr.

(ii) Substitute Membership

Councillors Matthew Black (Substitute), Joyce Pritchard (Substitute), Paul Stubbins (Substitute), John Wild (Substitute) and Jason Wood (Substitute)

(iii) Queries regarding this Agenda

Please contact Phillip Abel, Democratic Support - email pabel@lancaster.gov.uk.

(iv) Changes to Membership, substitutions or apologies

Please contact Democratic Support, telephone 582000, or alternatively email democracy@lancaster.gov.uk.

MARK DAVIES,
CHIEF EXECUTIVE,
TOWN HALL,
DALTON SQUARE,
LANCASTER, LA1 1PJ

Published on 23 July 2025.

COUNCIL BUSINESS COMMITTEE**FAIR FUNDING 2.0 CONSULTATION****31 July 2025****Report of Chief Finance Officer****PURPOSE OF REPORT**

To advise Members of the Government's consultation to proposed significant changes to the grant funding system for English local government

This report is public.

RECOMMENDATIONS

- (1) That the subject to final review by the s151 officer and Monitoring Officer the District Council's Network's response to the Governments consultation, is submitted as a formal response from Lancaster City Council.

1.0 Introduction

- 1.1 On 20 June 2025, the Government published a consultation titled [The Fair Funding Review 2.0](#). This consultation proposed significant changes to the grant funding system for English local government. These are expected to take effect on 1 April 2026, for the 2026/27 financial year.

2.0 Consultation Details

- 2.1 MHCLG has published its final consultation on fundamental changes to the local government funding model: The Fair Funding Review 2.0. The consultation includes final proposals to:
- make major changes to the main funding formula with a stronger link to levels of deprivation and population.
 - reset the baseline for retained business rates in full in 2026-27.
 - scrap the New Homes Bonus and return the funding to the core settlement.
 - simplify and consolidate several grant pots, including grants for homelessness prevention, rough sleeping and temporary accommodation.
 - provide transitional funding, including a minimum funding floor, to protect councils from the full impact of the funding changes.
 - move gradually towards greater local freedom on setting fees and charges,

- 2.2 These changes will be implemented over three years, beginning in 2026-27. They will be delivered via a multi-year finance settlement published later in 2025.
- 2.3 The Government has confirmed that income from the Extended Producer Responsibility (EPR) scheme for packaging producers will continue to be additional to core funding for waste collection authorities for the whole of the Spending Review (SR) period 2026-27 to 2028-29. This will be a significant income stream for districts. It will help cushion the impact of funding reform provided EPR income is not ringfenced.
- 2.3 The consultation does not propose any changes to council tax funding. The Council Tax referendum threshold will continue to be 2.99% or £5 (whichever is greater) for district councils. Social care authorities will continue to be able to raise an additional 2% precept.
- 2.4 MHCLG has also published a consultation on changes to the administration of council tax. It includes a proposal to shift to 12 monthly payments by default. This is likely to have material cashflow implications for all billing authorities. We do not cover the council tax consultation in this briefing.

3.0 Response to Consultation

- 3.1 The consultation is open to all Council's and as a result various organisations and networks have undertaken analysis of the proposed changes across the sector and developed a detailed response to the consultation.
- 3.2 As a District Council we are one of 164 members of the District Council's Network (DCN). Given the technical nature of the proposals the DCN is able to provide a more considered response to MHCLG. A briefing note responding to the consultation is provided at **Appendix 1** of this report for reference, with the DCN's final response expected ahead of the 15th August 2025 deadline
- 3.3 As the leading representative of the sector the DCN has a louder voice and can give a more effective influence on the Government than an individual submission. The s151 Officer has reviewed the briefing and agrees with the commentary provided and subject to review of the final response by s151 Officer and Monitoring Officer requests submission as a formal response from Lancaster City Council.

4.0 Options and Options Analysis (including risk assessment)

	Option 1	Option 2	Option 3
	To formally respond to the consultation with the DCN's comments	To formally respond to the consultation as an individual council.	To provide no response to the consultation
Advantages	The views of the Council will be considered by the Government when the policy details are formulated.	The views of the Council will be considered by the Government when the policy details are formulated.	No advantages
Disadvantages	While the Council may submit comments, they may not result in the issues raised being reflected in the final policy.	While the Council may submit individual comments, they may not result in the issues raised being reflected in the final policy.	That the views/ opinions of the Council will not be considered and future opportunities to feed into the process will be lost.
Risks	The Fair Funding Review 2.0 Consultation policy	The Fair Funding Review 2.0 Consultation policy	That the views/ opinions of the Council will not be

	may not be revised to reflect the views of the Council	may not be revised to reflect the views of the Council	taken into account and future opportunities to feed into the process will be lost.
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5.0 Officer Preferred Option (and comments)

5.1 Option 1 is the preferred Officer opinion. This option ensures that Lancaster City Council provides its views and will be able to make further comments should revisions and further consultation be carried out.

6.0 Conclusion

6.1 That subject to Members consideration and final review of the DCN response by s151 Officer and Monitoring Officer it is submitted as a formal response from Lancaster City Council.

**CONCLUSION OF IMPACT ASSESSMENT
(including Health & Safety, Equality & Diversity, Human Rights, Community Safety, Sustainability and Rural Proofing):**

Responding to the consultation is the Council's opportunity to ensure that appropriate considerations are taken into account in the development of the.

LEGAL IMPLICATIONS

None arising from this report

FINANCIAL IMPLICATIONS

There are no financial implications arising from this report

OTHER RESOURCE IMPLICATIONS, such as Human Resources, Information Services, Property, Open Spaces

There are no other resource implications arising from this report

SECTION 151 OFFICER'S COMMENTS

The s151 Officer has authored this report
Whilst there are no financial implications arising from this report the implication of the Funding Review will have a significant impact on the Council's finances.

MONITORING OFFICER'S COMMENTS

The Monitoring Officer has no further comments to add

BACKGROUND PAPERS

[The Fair Funding Review 2.0](#)

Contact Officer: Paul Thompson

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Local Government Funding Reform: Final Consultation

Briefing for DCN members

Date: 25 June 2025

Contact: dcn@local.gov.uk

1. Summary

Overview

- MHCLG has published its final consultation on fundamental changes to the local government funding model: [The Fair Funding Review 2.0](#). The consultation includes final proposals to:
 - make major changes to the main funding formula with a stronger link to levels of deprivation and population.
 - reset the baseline for retained business rates in full in 2026-27.
 - scrap the New Homes Bonus and return the funding to the core settlement.
 - simplify and consolidate several grant pots, including grants for homelessness prevention, rough sleeping and temporary accommodation.
 - provide transitional funding, including a minimum funding floor, to protect councils from the full impact of the funding changes.
 - move gradually towards greater local freedom on setting fees and charges, but no concrete proposals.
- These changes will be implemented over three years, beginning in 2026-27. They will be delivered via a multi-year finance settlement published later in 2025.
- There is one positive development not covered in this consultation. The Government has confirmed that income from the Extended Producer Responsibility (EPR) scheme for packaging producers will continue to be additional to core funding for waste collection authorities for the whole of the Spending Review (SR) period 2026-27 to 2028-29. This will be a significant income stream for districts. It will help cushion the impact of funding reform - provided EPR income is not ringfenced.
- The consultation does not propose any changes to council tax funding. The council tax referendum threshold will continue to be 2.99% or £5 (whichever is greater) for district councils. Social care authorities will continue to be able to raise an additional 2% precept.
- MHCLG has also published a [consultation on changes to the administration of council tax](#). It includes a proposal to shift to 12 monthly payments by default. This is likely to have material cashflow implications for all billing authorities. We do not cover the council tax consultation in this briefing.

Impact of funding reform on DCN members

- Districts budgets have been squeezed harder than other council types since 2010. Between 2010-11 and 2025-26 Core Spending Power (CSP) for districts fell by 23.1% in real terms compared to a 10.4% fall for English councils as a whole.
- Our analysis of the early funding reform consultation (February 2025) suggested that the total reform package would be negative for districts overall. We estimated that:
 - total district losses from the proposals would be 20% in 2026-27 before transitional support.

- in aggregate, districts would lose 4.5%, 3.2%, 2.3% in cash terms over the three years of the spending review period after transitional support
- The new consultation does not allow us directly to calculate the impact on types of council or on individual councils without further analysis. But our initial conclusion is that, following the changes in the revised proposals, the impact is unlikely to be much better for district councils and may be worse.
- MHCLG has indicated that, on average, local authority CSP will rise by 2.6% per year over the SR period. It has also indicated that the vast majority of councils with social care responsibilities will receive a real-terms increase each year. We think it is likely that many of the councils that do not receive a real-terms increase will be districts.
- The reasons for the negative impact on districts are:
 1. Changes to the main funding formula, especially:
 - stronger link to population and deprivation levels.
 - removal of the specific funding formulae for flood defence and coastal protection.
 - removal of the sparsity adjustment and fixed cost adjustment.
 2. Technical changes to the funding methodology ('control totals') that magnify the impact of the changes to funding formulae and weight funding more towards social care authorities.
 3. Full business rates re-set: this will have the biggest impact for districts and will cut 20% or more from spending power for more than 10 districts.
 4. Abolition of New Homes Bonus: this affects districts more than other councils.
- The negative impact is only partially offset by the inclusion of a new bespoke funding formula for temporary accommodation.
- It is important to stress that some districts will benefit from the funding reforms. Winners are most likely to be councils in areas with high levels of deprivation. But the benefits will only partially compensate for the big cumulative cuts to funding in those areas since 2010.
- We expect that councils facing the biggest impact will be those:
 - in sparsely populated areas;
 - with high need for flood defences and coastal protection; and/or
 - with high rates of business rates growth.
- The consultation includes new proposals on transitional funding:
 - This will protect councils from the full impact of all funding changes, including the business rates reset.
 - It will phase in the new funding model over three years so that no council feels the full impact until 2028-29.
 - There will be additional protection through a flat cash (0%) funding floor each year i.e. no council will see a cash reduction in its core funding over the SR period.
- The transitional funding will be vital for many district councils. But it will end more quickly than DCN believes is sustainable. We continue to think a longer transitional period is vital.
- Our conclusion about the likely impact is backed up by initial analysis undertaken by Pixel Financial Management: *"Shire districts have done particularly badly, and the losses in "needs" will only be compounded by the impact of the baseline reset and equalisation."*
- DCN is commissioning further analysis from Pixel on the full implications of the consultation.

DCN reaction

- We support the principle of directing funding to areas where it is needed most. The principle of targeting deprivation is welcome.

- However, these proposals will have problematic knock-on effects. The package of funding changes in this consultation is likely to tighten the squeeze on valuable district council services. This would be counter-productive and could undermine the Government's wider aims:
 - Preventative services, which can significantly reduce demand on the NHS and other more expensive public services, are likely to be hit hard because councils are not statutorily required to provide them.
 - The New Homes Bonus is being removed despite the Government's aim of building 1.5 million new homes during this Parliament.
 - The business rates reset will penalise areas that have seen an upsurge in business rates receipts in recent years due to their pro-growth attitude which has boosted their local economy.
- You can read the full DCN press statement [here](#).

Next steps and further information

- The consultation includes a calculator to enable any council to estimate its share of resource needs under the new funding model. However, this does not allow councils to calculate their total funding allocation. You can find this calculator as Annex A on the [main consultation webpage](#).
- MHCLG intends to publish a policy statement in early autumn (as it did in 2023 and 2024). The aim will be to provide councils with all the essential information they need to estimate their funding allocation for each year of the multiyear settlement. The policy statement is likely to be published in September or October.
- Final individual funding allocations and Core Spending Power calculations will be provided in the provisional Local Government Finance Settlement in December.
- The funding consultation is open until 15 August. DCN will submit a full response.
- We strongly encourage all DCN member councils to submit a consultation response.
 - We will aim to provide you with a draft DCN consultation response in good time to inform your own council's response.
 - We will work with Pixel Financial Management to produce detailed analysis to fully understand the impact for district councils.
 - In the meantime, we hope this briefing will give you a head start in considering the impact for your council and the points you may wish to raise in a consultation response.
- If you have any questions or comments, please contact dcn@local.gov.uk

2. Detailed overview of consultation proposals

New funding methodology (Chapter 2)

- The Government is proposing major changes to the formula for allocating core grant funding – known as Settlement Funding Assessment (SFA).
- This will bring together an updated assessment of a council's relative need for central grant funding and make a 'resources adjustment' to account for its ability to raise revenue locally (especially its council tax base).
- Councils with greater local revenue raising ability will have their relative share of need adjusted downwards, all things being equal.
- There will be transitional arrangements to blend in the new funding methodology over the three years of the SR period.
- Core Spending Power (CSP) will be a combination of SFA plus transitional funding plus council tax income.
- Whilst the calculation will account for local authorities' ability to raise council tax, they will continue to retain all council tax they raise locally.

Settlement Funding Assessment (SFA) = relative needs share allocation – resources adjustment

New Spending Power = Settlement Funding Assessment ± transitional arrangements + Council Tax income

Funding simplification (Chapter 3)

- The Government proposes to simplify the grant landscape from 2026-27 into a small number of consolidated grants including:
 - **Homelessness and Rough Sleeping Grant** – brings together funding for all homelessness and rough sleeping revenue funding, including the Homelessness Prevention Grant - except for temporary accommodation funding, which will be rolled into Revenue Support Grant (RSG). Broadly speaking, the new grant will be allocated according to the methodology for distributing Homelessness Prevention Grant.
 - **Public Health Grant** – consolidates the existing Public Health Grant with other service-specific grants to create a wider Public Health grant, delivered as a separate grant within the Local Government Finance Settlement.
 - **Crisis and Resilience Grant** – enables local authorities to build the financial resilience of communities and assist those facing financial crisis, incorporating Discretionary Housing Payments and Household Support Fund.
 - **Children, Families and Youth Grant** – consolidates the Children's Social Care Prevention Grant and the Children and Families Grant, alongside further investment in children's social care reform. The Government will explore whether additional grants for children, families and youth services can be consolidated within this grant.
- Where grants outside the settlement cannot be placed into a suitable consolidated grant or do not constitute an exception, the Government will roll them into RSG where appropriate.
- The Government proposes to retain a standalone Section 31 Grant for Local Authority Better Care Grant. The distribution of the Local Authority Better Care Grant will be the same as the

updated Settlement Funding Assessment. Retaining a Section 31 Grant will ensure that current Better Care Fund pooling arrangements continue.

DCN view

- DCN supports the principle of simplifying and consolidating grants.
- We will need to carry out more detailed analysis to be sure that the method for allocating Homelessness and Rough Sleeping Grant does not have perverse consequences or penalise districts.
- We have concerns about consolidating the Discretionary Housing Payments and Household Support Fund into a single grant. There is a risk this will lead to all funding in the grant being allocated to county and unitary councils in the same way as currently happens with the Household Support Fund. DCN's view remains that all grant related to housing should be allocated directly to housing authorities.

Approach to assessing demand (Chapter 4)

- The Local Government Finance Settlement's core distribution has traditionally used 15 relative needs formulae (RNFs) that encompass a range of service areas. MHCLG proposes to update the formulae (see table below for full detail).
- The key points are:
 - Main foundation formula will be more strongly linked to levels of deprivation and population.
 - Separate formulae for adult and children's social care services have been retained and updated as they are critical to support the sector to deliver responsibilities which represent their largest costs.
 - Separate new formula created for Temporary Accommodation (TA).
 - Previous separate formulae for Coast Protection, Flood Defence, and Environmental, Protective and Cultural Services, and Concessionary Travel are removed. Funding for these services will be allocated according to the general foundation formula i.e. not accounting for specific cost/demand drivers for these services.
 - Fixed cost adjustment removed.
- TA is currently funded through multiple sources: Homelessness Prevention Grant (HPG), the Local Government Finance Settlement, and Housing Benefit TA subsidy (funded through the welfare system).
 - TA grant funding will be consolidated.
 - The TA element of HPG will be separated out, then combined with all other TA grant and rolled into the main Revenue Support Grant.
 - There is no change to the Housing Benefit subsidy regime.
- There is an important technical point about 'control totals' which appears to have a negative impact for district councils:
 - Each individual formula is assigned a weight to help determine the impact a formula has in the overall calculation. These are collectively known as the control totals. They reflect the scale of national expenditure on the service areas assessed by the formula.
 - To arrive at control total weights, the Government proposes using Revenue Outturn data to calculate net current expenditure by local government across services.
 - It will then calculate individual control total shares for each formula based on their relative proportion of the total national net current expenditure.

- **The net result is to cause the ‘lower tier’ share of relative needs to fall, possibly substantially. This is because control totals will be driven by changes in the pattern of actual expenditure, especially the large increase in social care spending which has crowded out other types of expenditure.**
- The table below summarises the changes in the formulae from the existing method to the updated core assessment. Chapter 12 of the consultation provides a detailed explanation of the methodology for each of the relative needs formulae.

Summary of formulae proposed in the updated core assessment

2013-14 formulae in current Settlement Funding Assessment	FORMULAE PROPOSED IN THE UPDATED CORE ASSESSMENT
Adult's Personal Social Services (Social Services for Older Adults)	Updated Adult Social Care (Older Adults)
Adult's Personal Social Services (Social Services for Younger Adults)	Updated Adult Social Care (Younger Adults)
Children's Services (Youth and Community)	New Children and Young People's Services
Children's Services (Children's Social Care)	New Children and Young People's Services
Children's Services (Central Education Functions)	New Home to School Transport
Concessionary Travel	New Foundation Formula (Upper Tier) New Foundation Formula (Lower Tier)
Continuing Environment Agency Levies	New Foundation Formula (Upper Tier) New Foundation Formula (Lower Tier)
Coast Protection	New Foundation Formula (Upper Tier) New Foundation Formula (Lower Tier)
Environmental, Protective and Cultural Services (Lower Tier)	New Foundation Formula (Upper Tier) New Foundation Formula (Lower Tier)
Environmental, Protective and Cultural Services (Upper Tier)	New Foundation Formula (Upper Tier) New Foundation Formula (Lower Tier)
Flood Defence	New Foundation Formula (Upper Tier) New Foundation Formula (Lower Tier)
Fire and Rescue	Updated Fire and Rescue
Highways Maintenance	New Highways Maintenance
n/a	New Temporary Accommodation
Fixed Costs	No longer included in assessment
Legacy Capital Finance	No longer included in assessment

DCN view

- The changes to funding formulae are negative for districts overall and will be negative for many districts individually.

- The new formula for TA will benefit many districts. But for most districts it is unlikely to be outweighed by the changes to the core foundation formula, the negative impact of removing the formulae for coastal protection and flood defence and removing the Fixed Cost Adjustment.
- The changes to the 'control totals' appear to have a significantly negative impact for districts.

Approach to assessing cost (Chapter 5)

- Funding allocations and calculations of relative need will be adjusted for the differential cost of delivering local government services.
- As in the current model, the Government will apply an Area Cost Adjustment (ACA) to the Relative Needs Formulae to account for differences in the costs of delivering services. However, it is making significant changes to the method for calculating the ACA.
- The new ACA will comprise four elements:
 - Rates Cost Adjustment – aims to measure the difference in the cost of property rates / rents between local authorities e.g. cost of using equivalent premises due to differences in local supply and demand factors.
 - Labour Cost Adjustment – aims to measure the difference in the cost of labour between local authorities.
 - Accessibility Adjustment – aims to measure the impact of the difference in travel time to provide services on the cost of labour. It proposes two measures within this adjustment - a dispersal adjustment factor (longer journeys to reach households) and a traversal adjustment factor (longer journeys between households).
 - Remoteness Adjustment – aims to measure the impact of separation from larger concentrations of service users.
- **The most significant change for districts is the removal of the existing Sparsity Adjustment and its partial replacement by the Accessibility Adjustment and Remoteness Adjustment.**
- Table 5 on page 57 of the consultation shows the weighting of these different adjustments for each element of the funding formula. This indicates that the Accessibility Adjustment and Remoteness Adjustment will have a relatively small weighting.

DCN view

- We have not yet carried out full analysis. But it is likely that the removal of the sparsity adjustment will be very negative for councils in sparsely populated areas.

Other resource adjustments (Chapter 6)

- The funding formula will be adjusted to factor in the council tax base of a local authority. This will be done by setting a notional level of council tax for all authorities rather than basing the calculation on actual levels of council tax set and collected.
- The Government proposes to fully include the impact of mandatory council tax discounts and exemptions in the measure of taxbase but to exclude discretionary discounts and premiums. This approach is the same as the one applied in the current funding regime.
- It proposes to uniformly apply the average tier split in multi-tier areas to the measure of council tax in the resources adjustment – known as 'tier splits'. To do this it will calculate the average share in council tax receipts between the shire county precept, the shire district element and the fire element of council tax bills across the country. It will then apply that percentage uniformly to the measure of council tax in the resource adjustment for relevant areas.

- Tier splits are important and can make a material difference to the funding outcome for district councils. The lower the district share, the better the outcome for districts. The table below shows the indicative split.

England average council tax tier split 2024-25

District Council	County Council	Fire Authority
11.0%	84.4%	4.6%

DCN view

- We will need to carry out more detailed analysis before concluding whether the method for council tax equalisation has a significant impact (positive or negative) for districts.
- On initial analysis it appears the proposed methodology for tier splits will be reasonably favourable for district councils.

Business rates retention (Chapter 7)

- MHCLG has confirmed it will fully reset the baselines for retained business rates in 2026-27.
- The current Business Rates Retention System includes a safety net to protect local authorities from significant negative impacts to their income by guaranteeing that no local authority will see its income from business rates fall beyond a set percentage of its Baseline Funding Level. The safety net level is currently 92.5%.
- The consultation proposes to increase the level of protection provided by the Safety Net for 2026-27 before scaling protection back down to the current 92.5% level over the course of the multiyear settlement period.
- The Government is considering whether business rates pooling arrangements should continue from 2026-27. It has made no decisions on this point.
- **Importantly, the impact of the full business rates reset will be included in the calculation of transitional protection funding. This will be critical for the councils badly affected by the reset.**
- There is an unresolved point about how the surplus created by resetting the baseline will be redistributed to local authorities. It would be better for districts if the method for reallocating the surplus takes account of past business rates growth rather than simply using the main foundation formula.

DCN view

- DCN is disappointed that the Government is going ahead with a full reset. In our view this penalises many councils who have worked hard to promote local growth. It will take out a significant chunk of funding for some or many councils, making them reliant on transitional protection or drawing down on reserves.
- We will push MHCLG for further measures to alleviate the impact for the councils worst affected.

New Homes Bonus (Chapter 8)

- The Government intends to scrap the New Homes Bonus (NHB). It argues the NHB does not act as a genuine housing incentive.
- NHB funding will be returned to the core settlement and allocated according to the updated assessment of needs and resources.

- Under the new method for calculating housing need, 38% of the new 371,000 annual national housing target would be delivered in district areas. Of the 66k per year additional homes in the 371,000 target, 82% are in district areas.

DCN view

- DCN does not agree that NHB is an ineffective housing incentive. We continue to think there is a need for a housing incentive and that abolishing NHB will make the job of building our share of 1.5 million homes harder.

Transitional Arrangements (Chapter 9)

- The Government will phase in the new funding model (including the changes to the funding formulae and business rates rest) over the three-year period of the multiyear funding settlement.
- This will blend the allocation of funding between the new allocation method and the current method. In Year 1 (2026-27), 33% of funding will be provided according to the new method. This will rise to 66% in Year 2 and 100% in Year 3.
- The consultation also proposes a minimum funding floor to offer further protection beyond the main transitional arrangements:
 - It is consulting on a proposal for a 'flat cash' (or 0%) funding floor.
 - It proposes to continue the existing policy that any protection offered through a funding floor assumes local authorities use their full council tax flexibility
- The Government recognises that there are some authorities which will require bespoke treatment through the transition e.g. because their new share of funding is furthest from their current share of funding. MHCLG will directly engage these authorities on transitional arrangements. They are likely to include district councils, especially those badly most affected by the business rates reset.

DCN view

- The transitional protections are essential but do not last long enough. DCN will continue to push for a longer transitional period and analyse the case for a more generous funding floor.
- We do not believe it is right or sustainable for councils to be forced to run down unallocated reserves to cushion the impact of funding reform.

Devolution and Local Government Reorganisation (Chapter 10)

- The consultation confirms that all Mayoral Strategic Authorities will receive an Integrated Settlement from 2026-27.
- The consultation acknowledges that areas developing reorganisation (LGR) proposals will need to do so in light of the funding reform proposals. But it does not provide any additional information with which to do this.
- Where two-tier areas reorganise into a single unitary authority during the period of the multiyear settlement, the Government proposes that allocations of the predecessor authorities will be combined to determine the allocation of the successor authority.

DCN view

- The Government continues to assert that LGR will deliver substantial savings. The evidence from previous rounds of reorganisation is far from conclusive that real savings will be delivered. What is certain is that reorganisation brings significant short-term costs.
- LGR can bring long-term economic benefits if done in the right way. DCN strongly believes this means creating smaller unitary councils with a close connection to local places and communities.
- It will continue to be very hard for councils to make a robust financial case for LGR without more detailed information about specific funding allocations.

Sales, Fees & Charges (Chapter 11)

- In the earlier funding reform consultation, the Government sought views on whether changes to certain sales, fees and charges would be justified and whether responsibility for setting levels for some fees and charges should be devolved to local authorities.
- The consultation acknowledges that several significant sources of fee revenue are set by central government and have not been adjusted in line with inflation for a number of years or decades.
- The Government intends to review all fees previously identified as being significantly below full cost recovery and consider where there is the strongest case for reform.
- To support this review, it sets out a proposed framework against which fees can be assessed. It is a simple framework that focuses on assessing the risk to service users from increasing fees or devolving fee setting to local authorities. The elements are:
 - Impacts on working people;
 - Impacts on people who share particular protected characteristics under the Equality Act 2010;
 - Impacts on businesses;
 - Behavioural impacts, for example if changes to the fee level would act as a disincentive to use the service; and
 - Quality, potential for improvement, and financial sustainability of the service
- The Government proposes taking a gradual, phased approach to fees and charges reform, first taking action to update a small number of fees centrally and then seeking to devolve limited fee setting to local government towards the end of the SR period.
- The consultation does not include any proposals to increase or devolve specific fees.

DCN view

- The approach to reforming fees and charges is very timid and slow. Fundamental changes to fees and charges could make a tangible difference to financial sustainability for district councils.
- There is no good reason why councils should not be set free to recover the full cost of providing services for which a fee is charged provided there are sensible and proportionate mechanisms to protect service users from any undue impact.

COUNCIL BUSINESS COMMITTEE**Consultation on the Lancashire Local Nature Recovery Strategy****31st July 2025****Report of Chief Officer – Planning and Climate Change****PURPOSE OF REPORT**

To allow the Committee to consider the draft response to the Lancashire County Council Draft Local Nature Recovery Strategy consultation.

This report is public.

RECOMMENDATIONS

- (1) **That the consultation response to the draft Local Nature Recovery Strategy be agreed and formally submitted.**

1.0 Introduction

- 1.1 Local Nature Recovery Strategies (LNRS) were introduced in the Environment Act 2021 to drive nature's recovery and provide wider environmental improvements. There are 48 strategy areas which together cover the whole of England with no gaps or overlaps. Following the identification of areas the Secretary of State for Environment, Food and Rural Affairs appointed 48 'responsible authorities' to lead the preparation of the strategy for each area. Lancashire County Council has been appointed the 'responsible authority' to lead on the preparation of the LNRS for Lancashire, including Lancaster District.
- 1.2 The core purpose of the LNRS is to reverse the ongoing decline of biodiversity and nature. In doing so each LNRS must:
- Agree a series of priorities for nature's recovery;
 - Map the most valuable existing areas for nature; and
 - Map specific proposals for creating or improving habitat for nature and wider environmental goals.
- 1.3 Whilst Lancashire County Council is the responsible authority for preparing the LNRS the regulations (The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023) require them to be prepared with the support of 'supporting authorities'. Supporting authorities are identified as other planning authorities within the relevant strategy area and Natural England. Lancaster City Council is a 'supporting authority'.

- 1.4 In its role as a ‘supporting authority’ the regulations require that the City Council undertake the following:
- Work closely with the responsible authority and other ‘supporting authorities’ to shape the content of the LNRS so that it aligns to their organisation’s needs and priorities.
 - Provide local data and input information from relevant strategies.
 - Periodically review and agree drafts of the LNRS ahead of key stages, such as consultation or publication.
- 1.5 Officers from the City Council have been working with the County Council to achieve the above. This has included regular attendance at project meetings and the provision of comments on earlier drafts of the document. The City Council also provided approval in February 2025 for the LNRS to proceed to public consultation. Approval was given by the Chief Officer for Planning and Climate Change following the grant of delegated power by Cabinet in September 2024. Approval is required from all supporting authorities before the document can proceed to public consultation.
- 1.6 This approval was granted, and the County Council Cabinet has subsequently approved the document for wider public consultation. The document and supporting information is available to view from the following link [Local Nature Recovery Strategy - Lancashire County Council](#) with comments required by the 3rd August 2025.

2.0 Proposal Details

- 2.1 Lancashire County Council has been appointed by the DEFRA Secretary of State as the responsible authority for preparing the Local Nature Recovery Strategy (LNRS) for Lancashire under section 105 of the Environment Act 2021. The core purpose of LNRS is to reverse the ongoing decline of biodiversity and nature.
- 2.2 They are designed to be collaborative, locally led and evidence-based spatial strategies which aim to help restore and link up habitats so that species can thrive. The LNRS process aims to provide a tool to drive a more coordinated, practical, and focused action to deliver a bigger, better and more joined up Nature Recovery Network across the whole of England.
- 2.3 Each LNRS must agree priorities for nature recovery and propose actions at key locations where it would make a particular contribution to achieving these priorities. The Secretary of State has appointed 48 responsible authorities to lead on preparing a LNRS for their area. As already identified the responsible authorities are required to work with other organisations and partners in their area to agree what should be included in their LNRS.
- 2.4 Importantly, Officers from the City Council sit on the LNRS Steering Group and have been involved in providing evidence and information to the main LNRS team. This information has been fundamental in identifying potential priorities.
- 2.5 The County Council has also engaged with residents and community groups throughout the preparation of the strategy seeking opinions on what matters in relation to nature recovery. This information was gathered through four “People and Nature” roadshows (The Lancaster District session was held on the 25th March 2024); a public

engagement online survey; and two reports from online webinars held for representatives from land manager networks facilitated by specialist engagement consultants working alongside Lancashire County Council. The County Council also ran a training session with Members from the City Council on the 7th November 2024.

- 2.6 The LNRS is a statutory document which will, upon its completion, be used for a number of purposes. Firstly, to target funding opportunities, secondly to direct a coordinated approach to nature recovery across the county and finally it will identify areas of strategic significance for habitat enhancement having implications for the District Local Plan and the calculation of Biodiversity Net Gain (BNG).
- 2.7 It is worth noting that if an area of land is mapped as an opportunity area within an LNRS, and habitat creation or enhancement carried out to achieve BNG contributes to meeting the LNRS priorities for that area, then the biodiversity units generated are classed as “formally identified in local strategy” and this means that biodiversity units are given a 15% increase in value (1.15 strategic significance multiplier). This would benefit a developer who is able to provide this type of habitat (e.g. if providing new woodland where the LNRS encourages planting to increase and link existing woods).
- 2.8 The LNRS for Lancashire identifies the following aims:
- To halt local biodiversity loss and support thriving species populations which can move more freely through the landscape.
 - To conserve natural resources and build resilience to climate change.
 - To provide wider benefits for the people of Lancashire including increased and equitable access to green and blue space.
 - To reinvigorate existing partnerships and establish new ones to deliver nature recovery in places and spaces that need it most on a landscape-scale.
- 2.9 Whilst it is a statutory document, the LNRS does make it clear that it does not add levels of designation to land and therefore does not assign any level of protection or restrictions on land use. It also makes clear that landowners are not obliged to deliver the opportunities identified. They are simply opportunities within areas that could deliver the greatest gains in terms of nature's recovery, wider benefits for the environment and people, and the most investible opportunities for private finance in nature's recovery.
- 2.9 The LNRS is made up of two parts: the strategy, a statement of biodiversity priorities and measures and the local habitat map.
- 2.10 The **Statement of Biodiversity Priorities**, includes a description of Lancashire and its biodiversity in terms of geomorphology, important habitats, and species, drawing together existing information on the state of nature and the environment in Lancashire. Lancashire's important habitats span the following broad habitat types:
- Aquatic and wetlands
 - Coastal and estuarine
 - Grasslands (including agricultural land)
 - Lowland and upland peatland
 - Rocky habitats
 - Urban and infrastructure networks
 - Wooded habitats and trees

- 2.11 The existing and likely future pressures faced by each of these habitats have been identified, together with possible opportunities for nature recovery to overcome these pressures. These pressures and opportunities have informed the priorities (the long-term end results that the strategy is seeking to achieve) and the potential measures, or actions, that can be taken to contribute to achieving each agreed priority and deliver wider benefits such as climate resilience, flood risk management, more equitable access to green and blue space that is safe and sustainable, and improved health outcomes.
- 2.12 Measures carried out on each specific habitat will also benefit a range of Lancashire's most important species. These have been identified alongside the habitat measures. 24 species have also been identified as 'target species', these are some of Lancashire's most scarce, declining or most important species requiring bespoke actions beyond the more general habitat creation and enhancement measures. They include red squirrels, Duke of Burgundy Butterfly, Hen Harrier and Atlantic Salmon.
- 2.13 Additionally, three 'universal' priorities that relate to recurring pressures across all habitats have been identified as:
- Access to nature is provided whilst minimising recreational impacts on sensitive sites, habitats and species populations.
 - Nutrient enrichment, sediment deposition and pollution are minimised.
 - Biosecurity (measures aimed at preventing the introduction or spread of harmful organisms) and control of invasive species.
- 2.14 The Statement of Biodiversity Priorities is then supported by the **Local Habitat Map**. This identifies the existing Areas of Particular Importance for Biodiversity, this includes internationally, nationally, and locally designated sites, as well as Lancashire's statutory irreplaceable habitats. It also identifies the 'Areas that Could Become of Particular Importance for Biodiversity'.
- 2.15 These are the locations where creation or restoration of habitat could deliver the greatest gains in terms of nature's recovery, wider benefits for the environment and people, and the most investible opportunities for private finance in nature's recovery. The map shows how existing habitats (Areas of Particular Importance for Biodiversity) can be connected to create ecology networks enabling species to move between them and help nature thrive. Mappable measures for biodiversity are also displayed on the Local Habitat Map.
- 2.16 The Local Habitat Map can be viewed from the following link [The local habitat map - Lancashire County Council](#).
- 2.17 Officers have reviewed the LNRS and whilst in principle supporting the Strategy are proposing to make some additional comments. In summary they are:
- A. The supporting materials on methods and data used, which will be provided in the technical appendices to follow. These may be needed for Lancaster City Council's Green and Blue Infrastructure Strategy updates and for the Local Plan. It is recognised that the mapping is based on the best available baseline information and this data will be extended and updated for future LNRS revisions. Support is given for development of a State of Nature report for the County.
 - B. The Local Habitat Map identifies strategic areas for priority measures for nature's recovery, but this should not deter landowners and managers from carrying out

suitable measures elsewhere that also contribute to local nature recovery.

- C. Support is given for the inclusion of a priority to encourage access to nature whilst minimising recreational impacts on sensitive habitats and species. This is especially relevant at Morecambe Bay and the Council is undertaking surveys to inform future action on this.
 - D. Future climate-driven changes are not addressed as such, but opportunities for wetland and coastal habitat measures have been identified in some areas where future change is likely.
 - E. Minor comments and queries on presentation have also been made.
- 2.18 The full proposed consultation response is appended to the report. This includes a draft of the formal letter to be sent from the Chief Officer (Appendix 1) and also as requested by the County Council an on-line survey pro-forma (Appendix 2).

3.0 Details of Consultation

- 3.1 Officers have advised Members via Local Plan Review Group of the purpose of the LNRS and provided updates on its preparation. Training has also been provided to all Members as part of the Planning and Climate Change Service Training Programme held in late 2023.
- 3.2 Officers from the County Council also provided a detailed briefing to Members on the draft strategy on the 7th November 2024.
- 3.3 A report was presented to cabinet in September 2024 seeking delegated powers for the Chief Officer for Planning and Climate Change to approve the draft LNRS for consultation. This authority was granted and in March 2025 the Chief Officer for Planning and Climate Change confirmed that the City Council, in its role as Supporting Authority, was happy for the draft LNRS to be published for wider public consultation. Whilst granting approval for wider consultation the approval did not remove the opportunity for the City Council to submit more detailed comments as part of this wider public consultation.
- 3.4 Officers from the City Council have also been part of the preparation of the LNRS forming part of the LNRS Steering Group. Through this role Officers have helped input into the preparation of documents, providing comments and information at several key stages.
- 3.5 A link to the LNRS consultation has been provided on the City Council's website to help ensure that the local community are aware of its content and have the opportunity to submit comments on it.
- 3.6 In regard to the proposed responses, which are appended to this report, officers presented these to Local Review Group on 23 July 2025 where the content of the response was discussed and opportunity offered for further points to be raised. Any comments raised by LPRG Members will be provided via email in advance of Business Committee and reported verbally to Business Committee Members at the session.

4.0 Options and Options Analysis (including risk assessment)

	Option 1: To respond to the consultation	Option 2: To respond to the consultation with other comments	Option 3: To not submit a response to this consultation
Advantages	The views of the Council will be considered by the County Council when finalising the LNRS.	The views of the Council will be considered by the County Council when finalising the LNRS.	None
Disadvantages	None	Dependent upon the extent of any additional considerations, there is limited time to submit the consultation response.	The formal opinion of Lancaster City Council would not be provided, and an opportunity to contribute to the consultation would be lost.
Risks	None	None	None

5.0 Officer Preferred Option (and comments)

- 5.1 The preferred option is Option 1, to respond to the consultation as drafted following consultation with both the Planning Regulatory Committee and Local Plan Review Group.

6.0 Conclusion

- 6.1 The LNRS represents an important new strategy for the County. It provides the first document which truly puts nature first, identifying important habitats and species and the measures that should be put in place to strengthen their future. It recognises the challenges that nature faces but also the many opportunities that the County has for nature recovery and the wider benefits that its recovery can play for example in relation to health benefits, carbon capture and climate change, water and air quality improvements and flood management.
- 6.2 The Strategy provides a consistent basis for identifying priorities across the County and will be a key document for the City Council in securing future funding, targeting investment and directing opportunities through its Local Plan to secure the priorities and measures identified.
- 6.3 The attached documents represent a considered response compiled by several Officers of the Council. It is therefore recommended that it is formally submitted to the County Council.

CONCLUSION OF IMPACT ASSESSMENT

(including Health & Safety, Equality & Diversity, Human Rights, Community Safety, Sustainability and Rural Proofing):

None directly identifiable as a consequence of this report, however the purpose of the report is to advance processes intended to protect and enhance the natural environment for all.

LEGAL IMPLICATIONS

On adoption the LNRS will become a legally binding document. The content of the document will have implications for projects within the District in those areas of the District which have been identified as priority areas for nature recovery. The content of the LNRS will inform decisions made by the City Council.

FINANCIAL IMPLICATIONS

There are no direct financial implications arising from this report. The completed LNRS will however set out a framework for potential improvements to the natural environment in this district which may assist in securing future funding bids and provide direction for the City Council in terms of targeting areas of improvement.

OTHER RESOURCE IMPLICATIONS, such as Human Resources, Information Services, Property, Open Spaces

None directly arising.

SECTION 151 OFFICER'S COMMENTS

The s151 Officer has been consulted and has no additional comments.

MONITORING OFFICER'S COMMENTS

The Monitoring Officer has been consulted and has no further comments to add.

BACKGROUND PAPERS

Weblink to:

Local Nature Recovery Strategy –
Lancashire County Council Website.

[Local Nature Recovery Strategy - Lancashire
County Council](#)

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Ref:



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Our Ref:



Lancashire County Council
Environment & Planning

FAO: Local Nature Recovery Strategy Team
By Email

**Planning & Climate Change
Service**

PO Box 4
Town Hall
Lancaster
LA1 1QR
DX63531

XXXX 2025

Dear Sir/Madam,

DRAFT LOCAL NATURE RECOVERY STRATEGY CONSULTATION

Thank you for your letter of 26th June regarding the above.

Lancaster City Council welcomes the opportunity to comment on this consultation and recognises the importance of the Lancashire Local Nature Recovery Strategy (LNRS) in the recovery and enhancement of the natural environment across the County. The Strategy provides the first document which truly puts nature first, identifying important habitats and species and the measures that should be put in place to strengthen their future. It recognises the challenges that nature faces but also the many opportunities that the County has for nature recovery and the wider benefits that its recovery can play, for example in relation to health benefits, carbon capture and climate change, water and air quality improvements and flood management.

As drafted the Strategy provides a consistent basis for identifying priorities across the County and will be fundamental in supporting the City Council and other partners to secure funding and direct action to those areas where most improvements can be made.

Lancaster City Council supports the Strategy, its overall aims and the priorities set out and measures to achieve them.

The Council does have a few comments to make, set out below, which are in support of the LNRS or are minor points that can be addressed for the final version. The purpose of these comments are to further strengthen the role and focus of the document in terms of the actions it seeks to deliver.

Methods and data

Greater clarity is requested on the methods followed in identifying the areas for improvement across the different habitat types. It is recognised that each layer has been influenced by several data sources, some of which includes data provided by this Council, and that opportunities for the expansion and linking of habitats has influenced the mapping presented. While this is supported, Lancaster City Council requests that additional information is provided on both the data sources used and the assumptions that have been applied. From involvement in the development of the LNRS we understand that this will be addressed in a separate Evidence and Technical Information document. This information will support confidence in the robustness of the mapping, something which will be important when taking layers forward into local plan policies and development management decisions.

The rationale for selection of target species should be provided, because the choice includes both rare species and others that are more widespread but are taken to be indicator species. It is expected that this will be set out in the supporting technical evidence.

The ambitions around improving data and evidence is supported by the Council. The deficiencies in some types of information and coverage within the County is a notable issue for Lancashire. Opportunity to address such deficiencies are therefore supported, this includes the development of a State of Nature report for the County.

Opportunity areas and ecological network

The LNRS map guide states that Areas that could become of Importance are *"mapped here as opportunity areas where effort should be concentrated to carry out potential measures or actions to restore habitat, to achieve the most for biodiversity and the wider environment."* The Council supports the representation of ecological network modelling with land parcels rather than generalised model flows.

The text on the Local Habitat Map (p130) explains this approach well. Areas mapped are considered to have the best opportunities for nature recovery, based on best available datasets, and should therefore be prioritised. Nonetheless, Lancaster City Council would not want landowners and managers to be deterred from carrying out measures that support delivery of the priorities in nearby suitable areas. We consider this to be important for ecological networks. Not all landowners and managers with land in the mapped areas will wish to take up the opportunities identified, but there may be suitable alternatives for habitat connectivity (e.g. woodland creation) that could provide benefits additionally, or instead of some of the areas mapped.

Recreational access

The LNRS includes as one of the 'universal' priorities: Access to nature is provided whilst minimising recreational impacts on sensitive sites, habitats and species populations. The Council supports this priority to minimise recreational impacts on sensitive sites and the recommendation for collaborative development of a Strategic Recreational Access Management Plan for the Morecambe Coast and Lune Estuary (p42). This is a known issue for Lancaster District and the Council is working with two neighbouring authorities to address this. A visitor survey is currently being undertaken to assist the Council in identifying the zone of influence under which visitors visit the Bay and the nature of their visit. This information will inform the Habitat Impact Assessment of the Local Plan and guide future actions to reduce existing impacts while still enabling the societal benefits of public access to the coast. Measures to address this through the LNRS are supported.

Future changes in response to climate

The strategy does not appear to make any explicit provision within the included coastal and estuarine measures for the predicted sea level rise over the next 50 – 75 years. As many of these habitats are those most at risk from rising sea levels, it is suggested that provision is included for forward planning in this regard, to help these habitats survive the coming changes, and to move further inland where necessary. We note, however, that some areas in Flood Zone 3 have been identified as having opportunities for wetland and coast habitat measures and support this.

Minor errors and presentation

Management measure P5.1 (relating to upland peat) is phrased in such a way as to make it ambiguous as to the preferred method of management, particularly with regard to hydrology, burning, grazing and nutrient inputs. It should be made clear whether a reduction or increase is being suggested, and where it is not possible to specify, there should be clear instructions to seek professional advice before implementing any management practices that could cause irreparable harm to upland peat habitats.

As few people are familiar with roman numerals at high numbers, it is suggested that the footnotes are amended to a different numbering system.

The first paragraph on page 13 contains several typos.

The Priority and Measures tables (Table 5 onwards) have some measures highlighted in green. Presumably this is to show the mapped measures from unmapped ones, however this does not appear to be stated. Also some of the species measures, e.g. HH4 map not be readily mappable.

The table on page 57 appears to have a typo under the 'measures' section: C1.2. The description for these measures states the following: "*C1.2 – Remove or create pathways through barriers such as small...*" It is assumed that the term 'Remove or create' is a mistake, however if not then this should be amended for legibility.

An Evidence and Technical Information document – Appendix Ten is referenced in footnotes but not included in the strategy document. What are Appendices 3 to 10? It would be helpful to list the supporting document(s) in this report and include some links in the final version where the Appendices are held separately.

Further clarification is required on a specific site included on the draft habitat map, the site in question is a rocky habitat (Rocky: R3.1 – 367) identified at the end of Sand Lane, just outside the village of Warton. This site is known to have been previously used as a landfill, the Council presume this is why the site has gained this classification on the habitat map, however a high-level view of the satellite maps included within the LNRS mapping system seems to show no rocky or bare earth habitat remains in this location. It appears to be currently in use as a somewhat 'typical' grazed grassland. The Council are seeking therefore seeking clarification as to whether the R3.1 designation was intended for the site in its current state (pastureland), or whether the designation was mistakenly applied due to the site's history without regard for the land's current habitat type.

Conclusion

Lancaster City Council has also provided comments via the requested on-line survey pro-forma. The Council trusts that the responses provided in both this letter and the survey will be carefully considered by Lancashire County Council as it looks to finalise the LNRS for Lancashire.

Lancaster City Council commends the draft LNRS and looks forward to working with the County Council on the finalisation of the Strategy and on subsequent delivery of actions. We would be happy to discuss any of the points raised in this response if necessary.

Yours faithfully,

Mark Cassidy

MARK CASSIDY
CHIEF OFFICER – PLANNING AND CLIMATE CHANGE

Appendix 2 – LNRS on-line survey response

Vision & Aims of the Strategy

The Strategy provides a collective vision for nature recovery to work together to protect, enhance and connect our rich biodiversity (the variety of plants and animals we have in Lancashire) and natural environment to be enjoyed by more Lancashire residents and visitors.

It aims to:

- Halt local biodiversity loss and support thriving species populations, which can move more freely through the landscape.
- Conserve natural resources and build resilience to climate change.
- Provide wider benefits for the people of Lancashire including increased and equitable* access to green space* and blue space*.
- Reinvigorate existing partnerships and establish new ones to deliver nature recovery in the places and spaces that need it most on a landscape-scale.

The vision and aims of the LNRS are clear.

How strongly do you agree or disagree with this statement?

Please select one option only

☒

Strongly agree

☐

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any comments about the vision and aims of the LNRS please provide them below.

The Strategy provides the first document which truly puts nature first, identifying important habitats and species and the measures that should be put in place to strengthen their future. It recognises the challenges that nature faces but also the many opportunities that the County has for nature recovery and the wider benefits that its recovery can play for example in relation to health benefits, carbon capture and climate change, water and air quality improvements and flood management. The vision and aims are supported by the City Council.

[Why we need a Local Nature Recovery Strategy](#)(opens in new window)

The main purpose of the LNRS is to identify locations to create or improve habitat (the natural place in which an animal or plant usually lives) most likely to provide the greatest benefit for nature and the wider environment.

These mapped areas are intended to guide where effort can be focused and joined up to help improve connectivity and resilience for habitats and species across Lancashire. The LNRS is not a delivery plan but can be used to identify the best opportunities for nature recovery, target action and funding and hopefully inspire people to take action. Delivering actions for nature recovery will also provide wider benefits such as public access to nature, natural flood-risk management and resilience to climate change.

It is clear what the LNRS is trying to achieve.

How strongly do you agree or disagree with this statement?

Please select one option only

☒

Strongly agree

☐

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any comments about why the LNRS has been developed and what it is trying to achieve please provide them below.

As drafted the Strategy provides a consistent basis for identifying priorities across the County and will be fundamental in supporting the City Council and other partners to secure funding and direct action to those areas where most improvements can be made.

[Who the LNRS is for and how to use it\(opens in new window\)](#)

Everyone can take action to create or improve habitats and support nature recovery.

The LNRS provides the information to understand how and where action could be taken to help nature recover. It identifies the opportunities for nature recovery action in locations that are likely to provide the greatest benefit. It can be used to help inform future policies and plans, to target action in the right places and secure funding.

It is clear how the LNRS can be used

How strongly do you agree or disagree with this statement?

Please select one option only

☐

Strongly agree

☒

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any comments about who the LNRS is for and how to use it please provide them below.

The strategy would benefit from additional information on who is potentially responsible for implementation and delivery. This would provide greater clarity on how the measures identified are to be delivered, helping increase responsibility and ensuring the hard work undertaken in preparing the strategy is not lost.

[Description of Lancashire's landscape, biodiversity and priorities for nature recovery](#)*(opens in new window)*

Priorities are the outcomes that the strategy is seeking to achieve. They focus on the seven broad habitat types found across Lancashire:

- Aquatic (water based) & wetlands*

- Coastal & estuarine (the tidal area where rivers meet the sea)
- Grasslands (including farmland)
- Lowland & upland peatland*
- Rocky habitats
- Wooded habitats & trees
- Urban & infrastructure networks (eg roads, rail, bridges and buildings)

It is clear what the LNRS priorities are seeking to achieve.

How strongly do you agree or disagree with this statement?

Please select one option only

☒

Strongly agree

☐

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any comments about the LNRS priorities, for example if you feel any are missing, please provide them below.

The City Council supports the broad habitats identified, the priorities and potential measures. These provide an accurate representation of the main habitat types across the County and a logical way of presenting the strategy.

Potential measures

Potential Measures are the actions that could contribute to achieving the LNRS Priorities and deliver wider gains for the environment and people of Lancashire.

To read about the Potential Measures for each broad habitat group and answer the following question, please follow the links provided below.

- [Aquatic and wetland](#)*(opens in new window)*
- [Coastal and estuarine](#)*(opens in new window)*
- [Grassland \(including agricultural land\)](#)*(opens in new window)*
- [Peatland](#)*(opens in new window)*
- [Rocky habitats](#)*(opens in new window)*
- [Wooded habitats and trees](#)*(opens in new window)*
- [Urban habitats \(including infrastructure networks\)](#)*(opens in new window)*

It is clear what Potential Measures could be taken to achieve the LNRS priorities.

How strongly do you agree or disagree with this statement?

Please select one option only

☒

Strongly agree

☐

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any comments about the LNRS Potential Measures please provide them below.

The strategy makes clear which measures relate to the various habitat groups and how their delivery will assist in achieving the wider LNRS aims. It is helpful to have the potential measures presented in a way that relates to both the national objectives and targets for nature recovery and wider benefits, both of which will be useful with regard to future integration with the Local Plan.

[Lancashire's Target Species](#)*(opens in new window)*

Twenty-four species have been identified as Lancashire's LNRS Target Species. These are some of Lancashire's most scarce, declining or most important species requiring bespoke actions. They are:

Mammals:

- Red squirrel

Birds:

- Hen harrier
- Black-tailed godwit
- Black-headed gull
- Lesser black-backed gull

Plants:

- Yellow Star-of-Bethlehem
- Northern bedstraw
- Wood crane's-bill
- Melancholy thistle
- Lady's slipper orchid
- Petty whin

- Dwarf cornel

Fish:

- Atlantic salmon
- European smelt

Invertebrates:

- Duke of Burgundy butterfly
- High brown fritillary butterfly
- Pearl-bordered fritillary butterfly
- Large heath butterfly
- Belted beauty moth
- Least minor moth
- Wall mason bee
- Tormetil mining-bee
- Bilberry bumblebee
- Red wood ant

[Lancashire LNRS Target Species, priority, potential measures and associated benefits](#)*(opens in new window)* provides more detailed information.

I agree with the above list of twenty-four LNRS target species.

How strongly do you agree or disagree with this statement?

Please select one option only

☐

Strongly agree

☒

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any comments on Lancashire's twenty-four target species eg if you think any should be removed, or if any are missing, and if so why, please provide them below.

Details are given on the status of the species, although not how they were selected from the Long List.

[Lancashire's Biological Heritage Sites priority and potential measures](#)*(opens in new window)*

Biological Heritage Sites (BHS) are the best areas for biodiversity in Lancashire, outside of legally protected sites. Maintaining and enhancing these important non-statutory wildlife sites is key to future nature recovery. They have their own Priority and Potential Measures to encourage only those actions which would restore, enhance and maintain the ecological interest of these sites.

It is clear what the BHS priority and measures are seeking to achieve.

How strongly do you agree or disagree with this statement?

Please select one option only

☒

Strongly agree

☐

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any comments on the BHS priority and measures please provide them below.

It is important that the primary priority for BHS sites are measures that support and enhance the features for which the sites have been designated. Application of more general priorities in the Strategy that are not aligned with BHS site-specific priorities could be harmful to the sites, hence the need for a hierarchy of priorities for BHS sites and consultation on proposals.

[Lancashire's Local Habitat Map](#)(opens in new window)

The Local Habitat Map is intended to provide a clear visual way for groups and individuals to identify:

- Lancashire's Areas of Particular Importance for Biodiversity - i.e., the internationally, nationally and locally designated* sites as well as Biological Heritage Sites and irreplaceable habitats*

- Those Areas that Could Become of Particular Importance – i.e., the locations where there are opportunities to create, connect or improve habitat most likely to provide the greatest benefit for nature and the wider environment

Those that could become important have been identified to join up or expand existing areas of particular importance. This is intended to establish larger, more resilient networks of high-quality habitat, and show how spaces can be better connected across Lancashire.

It is clear what the Local Habitat Map is and how it can be used.

How strongly do you agree or disagree with this statement?

Please select one option only

☒

Strongly agree

☐

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any general comments on the Local Habitat Map please provide them below.

The guidance information is clear and the Local Habitat Map is easy to use, provided users toggle back and forth between the mapping of existing areas of importance and areas that could become of importance.

[Universal Priorities](#)*(opens in new window)*

Three 'Universal' Priorities that address pressures affecting all habitats are:

- Minimising the build-up of different types of pollution from nutrients such as sewage, and from soils and silt - for example following flooding events and pollution from industry and development
- Biosecurity (measures aimed at preventing the introduction or spread of harmful organisms) and the control of invasive species,

- Minimising the impact of recreational activities eg limiting access to sensitive areas during nesting seasons

It is clear what the Universal Priorities are seeking to achieve.

How strongly do you agree or disagree with this statement?

Please select one option only

☒

Strongly agree

☐

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any comments on the universal priorities eg if you think any are missing, please provide them below.

The City Council supports the identified universal priorities. These sit across all the habitat types and they will be fundamental in delivering the wider aims of the LNRS. The City Council is particularly supportive of the priority to minimise recreational impacts on sensitive sites. This is a known issue for Lancaster District and the Council is working with several neighbouring authorities to address this. A visitor survey is currently being undertaken to assist the Council in identifying the zone of influence under which visitors visit the Bay and the nature of their visit. This

information will be fundamental to informing the Habitat Impact Assessment of the Local Plan. Measures to address this through the LNRS are therefore supported.

Supporting Actions*(opens in new window)*

Supporting Actions are measures that will support and enable delivery of the LNRS Priorities, and which are grouped under the following themes:

- Data & evidence
- Engagement & collaboration
- Policies that support nature recovery
- Funding and finance for nature recovery

It is clear what the Supporting Actions are seeking to achieve.

How strongly do you agree or disagree with this statement?

Please select one option only

☒

Strongly agree

☐

Tend to agree

☐

Tend to disagree

☐

Strongly disagree

☐

Don't know/not applicable

If you would like to make any comments on the Supporting Actions please provide them below.

The City Council is supportive of the measures identified. The supporting action to improve data and evidence is especially supported by the City Council. The limited availability of this information for some habitats, species groups and areas is a notable issue for Lancashire. Opportunity to address this is therefore supported, this includes the development of a State of Nature report.

If you would like to make any further comments on the draft LNRS please provide them below.

Future discussion will be needed by Lancashire County Council and the Supporting Authorities about the best approaches for action on the LNRS priorities, in particular integration with Local Plans. Additional guidance from Defra may be needed on this.

By far the largest proportion of land within the County that is suitable for delivery of the LNRS is in private ownership and farmed or managed primarily for other purposes. This means the delivery of the LNRS priorities will be very dependent on the support available to landowners and managers who may be willing to contribute to nature's recovery. It will be strongly influenced by the Government's Landuse Framework, the Planning and Infrastructure Bill, any forthcoming amendments to the Biodiversity Net Gain regulations and above all by the type, scale and continuity of funding for farming and land management that contributes to nature recovery.