

## Oxfordshire's draft Local Nature Recovery Strategy: proposed response

<https://letstalk.oxfordshire.gov.uk/lnrs-phase3-consultation>

p 16. Baseline map does not include CTAs (Conservation Target Areas)

<https://www.wildoxfordshire.org.uk/oxfordshires-nature/conservation-target-areas>. The Oxfordshire Wildlife and Landscape Study (OWLS) (Blackwell & Nikolakaki, 2004), which investigated the landscape character and biodiversity resource of the county, was a precursor to the development of Oxfordshire's Conservation Target Areas (CTAs). (See also: Wild Oxfordshire, Conservation Target Areas: Governance - Background, governance & process for CTA creation and review, undated). The CTA approach was a major milestone for conservation in Oxfordshire and could make a major contribution, once updated, to the LNRS process.

p 18 (para 2). 'productive farmland' is vague and open to ambiguity. All farmland is productive, more or less?

para 2. Agreed that managed sensitively, farmland can co-exist with a wide range of wildlife. However, we continue to lose wildlife (see the Oxfordshire State of Nature Report: <https://www.wildoxfordshire.org.uk/oxfordshires-nature/oxfordshires-state-of-nature>), despite the best efforts of many farmers.

p. 36. the reference to land cover in para 6 (Oxfordshire Wildlife and Landscape Study) is incorrect and misleading. The legend should refer to Landscape Character Types (LCTs). Land cover is only one of the attributes that was used to produce the LCA (Landscape Character Assessment) map for Oxfordshire, recently updated by Steven Warnock for OCC. There is also a missed opportunity here to refer to the *cultural landscapes* of Oxfordshire, a missing element throughout the LNRS. The focus on the ecological is important but fails to account for the equally important role of cultural landscapes in determining priorities and options for nature recovery - the challenging 'what and how much goes where'. See also the Historic landscape Characterisation for Oxfordshire (<https://www.oxfordshire.gov.uk/residents/environment-and-planning/archaeology/landscape-characterisation>).

p.37. The legend to the map is incorrect (see above for explanation)

p. 42 (para 2). Landscape Character: limestone grassland, not chalk grasslands. The para (Landscape Character) needs re-writing:

- It's a quintessentially *Cotswold* (rather than English) landscape?
- High wold dip-slope is a contradiction: the dip-slope is not the high wold

- 'Pockets hills and valleys'.... hills and valleys characterise this landscape but not as but not as 'pockets'
- Land does not feel particularly steep (cf. for example, by contrast, steep valleys of Cotswolds in part of Glos near Stroud). It feels generally open with wide views.
- Nature and landscape are not working together in this landscape: the 2017 Oxfordshire State of Nature Report demonstrates that we continue to lose species.
- The reference to grazing sheep as being a good thing is contestable. Whilst livestock farming undoubtedly has wildlife benefits, the carbon footprint of (cattle especially) remains a major source of climate changing greenhouse gas emissions.

p 43 (para 1). Ecosystem Services. The first sentence suggest that water quality is good all the way to London...this is misleading and there is considerable evidence to the contrary (see: Wild Oxfordshire, <https://www.wildoxfordshire.org.uk/evenlode/water-quality-and-advocacy> and the work of the Evenlode Catchment Partnership and Earthwatch Europe, among others). Very little limestone is quarried for housebuilding nowadays. Historic parkland, except for parts of Blenheim, are not accessible except by the relatively few public footpaths. For example, Wychwood Forest is almost entirely closed to the public and the historic parkland, apart from a footpath from Charlbury to Finstock, is not accessible to the public.

p43 (para 2). Biodiversity of note: 'The continued careful management of the grasslands and arable fields, has supported the survival of many wild plant species.....' It's not clear which type of grasslands are being referred to – is it lowland calcareous grassland, which has decreased significantly in recent decades, or permanent, unimproved pasture? Shepherd's-needle (*Scandix pecten-veneris*) is a rare arable weed and unlikely to be 'spotted'.

p. 44 (para 2). FIPL, whilst it applies to the CNL, is funded by Defra (see The Path to Sustainable Farming: An Agricultural Transition Plan 2021 to 2024 November 2020).

p. 45. Opportunities for recovery: what is meant by 'arable habitats' in this context? Why is the focus only on calcareous habitats and does this refer to grassland?

p. 45 (para 2). The use of the term 'calcareous landscape' suggests a whole landscape where the geology/soil type and topography across the whole region is suitable for the restoration of rare calcareous habitats. This is not the case and, as the description of the region makes clear under the section 'Landscape Character', many areas are characterised by deep, fertile alluvial soils or overlain with boulder clay (outwash from former glacial periods). The priorities and options for nature recovery differ widely as the natural (and cultural) landscape changes.

The reference to the conflict between woodland versus other types of habitat restoration is important and needs further development throughout the Strategy. It is not clear, either from this document or from the interactive map, what approach will be used to identify priorities for nature recovery and how any land use conflicts between, for example, different types of habitat, development, agriculture etc, will be resolved. A reference to the proposed Land Use Framework for England is of potential value in this respect (see: House of Lords Land Use in England Committee Report of Session 2022–23: Making the most out of England’s land, 2023). Also significant in this respect are CTAs, OWLS, Nature Recovery Areas and Oxfordshire Treescapes(<https://www.naturerecovery.ox.ac.uk/projects/oxfordshire-treescape-project/>).

p.73 (para 1). Whilst we understand the complexity of using an index of water quality, it is potentially confusing to present a map in which only 2 percent of rivers are classified as being in ‘good’ condition, but to subsequently suggest that this is a product of the ‘one-out, all-out’ methodology and that, in fact, 67 percent of ‘all the ecological elements for water bodies in the 2019 full classification were at good or high status’. Could the map of rivers be disaggregated to show shorter sections, each with their own score. This could be mapped as a subset of the whole county at a necessarily large scale to enable the all-important detail to be shown?