Department for Environment, Food and Rural Affairs

Biodiversity 2020: Developing indicators for measuring success

Response Form

August 2011

Please use this form to comment on the Technical Discussion Paper 'Biodiversity 2020: Developing indicators for measuring success.'

Responses can be sent by email (preferred) or post by November 11th 2011.

Email address: biodiversity@defra.gsi.gov.uk (please mark subject line: 'Response: indicators')

Postal address: Biodiversity Programme (Response:indicators), Zone 1/17, Department for Environment, Food and Rural Affairs, Temple Quay House, 2 The Square, Temple Quay, Bristol. BS1 6EB

Before you start

Your response will be used to develop an indicator set that makes best use of available data and is: relevant to the strategy, scientifically robust, compact, easily communicated and affordable. Please ensure that if you are commenting on particular indicator topics that you specify the indicator topic by number.

Defra and Natural England will publish a summary of the issues raised by respondents to this discussion document. This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details. We will also store individual responses on a secure hard drive as members of the public may ask for a copy of responses under freedom of information legislation.

If you do not want your response - including your name, contact details and any other personal information — to be publicly available, please say so clearly in writing when you send your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer, that won't count as a confidentiality request.

Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

Please provide your name, organisation (if applicable) and contact details below. Please include an email address if you have one.

Name	Mark Wills	
Organisation/company (if applicable)	Association of Local Environmental Records Centres CIC (ALERC)	
Job title (if applicable)	Vice Chair	
Address	c/o NEYEDC St. William's College 5 College Street York YO1 7JF	
email	Mark.Wills@neyedc.co.uk	
Telephone no. (including area code)	01904 641631	
Does your organisation provide data for the existing England Biodiversity Indicators?	☐ Yes	⊠ No

Questions for respondents

Table 1 in the technical discussion document sets out 17 indicator topics intended to cover the range of Strategy priorities and outcomes. Within each topic, the intention is to develop an indicator using best available data. Each indicator may have more than one measure where it is not sensible to combine them (for example, the existing indicator on wild birds has four measures for wetland, woodland, farmland and sea birds and each is assessed separately).

Table 2 sets out, for each of the indicator topic areas, the existing indicators available, the data sets that might underpin any indicator refinements or development and a set of options for that refinement or development.

Questions are set out below. Please leave the response box blank for any question that you do not wish to answer. Boxes may be expanded as required.

- Q1. Ensuring development options have been adequately identified. For those indicator topics assessed as amber or red in Table 2, are there any:
 - a. Existing indicators (under development or used elsewhere); or
 - b. Existing data sources,

that are not listed in the discussion document but which could be used to develop indicators for the Strategy?

Enter your comments here. Please state which indicator topic(s) you are addressing.

The Association of Local Environmental Records Centres (ALERC) is a professional body set up as a Community Interest Company to represent the interest of the Local Records Centres (LRCs) in the UK covering both biodiversity data and geodiversity data. Views presented in this response are founded on a general consensus on behalf of ALERC; however, individual LRCs may also take their own corporate view. Our comments are as follows:

1: Extent and condition of selected habitats

Datasets listed should include habitat data held by Local Records Centres. While some of this data is fed into national habitat inventories there is no consistent, long term or regular mechanism for this. This data can be more up to date than that shown in the national inventories where it is actively managed and updated.

BARS is listed as a data source. Will this provide sufficient or appropriate data to be useful, especially with reduced support for Local Biodiversity Officers? Four of the seven listed habitats for the 2008 reporting are described as "best guess". The reduced support for existing Local Biodiversity Officers and for now just a trial of new Local Nature Partnerships suggests data from this source will be too limited to be useful unless greater support is provided.

Local Wildlife Sites data: where there is continued survey of these sites new and existing areas of habitat can be identified, accurately mapped and also assessed for condition. It is often the main source of such data.

The dataset for the single data list 160 (the old NI197), "proportion of Local Sites where positive conservation management is being achieved" would be a useful dataset to use for this topic for sites with the relevant habitats. This would include coverage additional to that provided by habitat within agri-environment or woodland grant scheme outside of SSSIs.

Some LRCs have worked with their local biodiversity partnership on creating data-based models for assessing habitat condition through the presence of key indicator species typical of that habitat. Whilst this approach isn't a replacement for field survey, a standardised methodology could provide a baseline from which to measure change in condition.

3: Habitat Connectivity

The comments made for Indicator Topic 1 also apply here.

The proposal to develop new indicator of 'structural' connectivity or fragmentation measures should specifically mention Local Wildlife Sites but not exclude other biodiversity based Local Site data – we suggest a change to "local sites including Local Wildlife Sites".

4: Status of priority species

Data sources should include datasets held by Local Records Centres. While some of this data might be fully available through the NBN Gateway other datasets are restricted or absent. The availability of such data is reliant on continued national and local support for Local Records Centres.

Data collected by ecological consultants should also be mentioned as they regularly work with priority species. The mobilisation of this data is being looked at by a collaboration of the Association of Local Environmental Record Centres, the National Biodiversity Network Trust, the Institute of Ecology and Environmental Management and Natural England. The close working relationship between ecological consultants and Local Records Centres means that some data is already being mobilised. LRCs play a key role in extracting and managing this data.

LRCs could also utilise their networks of local recording groups and recorders to implement nationally agreed monitoring methodologies to collect local data to national standards so they are comparable across county boundaries.

5: Trends in abundance and distribution of selected species of birds, butterflies, bats and plants

For certain groups Local Records Centre data and data from ecological consultants can contribute to this indicator. In relation to data from the voluntary sector Local Records Centre often work closely with National Species Schemes and act as a conduit for locally collected data which will be incorporated into national datasets.

11 Integrating biodiversity considerations into local decision making.

The status of this topic is shown as green but we would question this assessment. The existing indicator listed is "Number of Local Wildlife Sites in positive management." This indicator does not relate to the integration of biodiversity considerations into local decision making. It is a useful indicator, perhaps of habitat condition and positive management. A measure of the use of Local Wildlife Site information, along with data on protected and priority species and priority habitats is required.

This indicator needs the status of red and development of suitable datasets is required.

There is a clear need for Local Authorities, AONBs and National Parks to access or to continue to access local biodiversity information and to make full and proper use of the data throughout the organisation. Biodiversity data needs to be used at the earliest opportunity for strategic and infrastructure planning, management planning and within the development control process. In this way such organisations will meet the biodiversity duty placed on them by Natural

Environment and Rural Communities (NERC) Act.

The Defra report CTX0811 Review of the Biodiversity Duty contained in Section 40 of NERC Act 2006 states that "With the exception of AONB boards/National Park Authorities, typically half or less of each type of authority reported "often" using biodiversity surveys or pre-existing biodiversity information to inform development proposals."

Greenspace Information for Greater London (GiGL) has developed an automated planning screening portal in association with the NBN Trust and Natural England. However despite its effectiveness it has not been adopted by Local Authorities. The final report on the portal produced by GIGL for DEFRA states that "in contrast with initial assumptions, most Local Planning Authorities were found to routinely disregard assessment of biodiversity and nature conservation interests for the majority of applications, thus highlighting that in most cases automated screening is not a welcomed time-saving alternative to existing manual processes, but rather an additional process altogether".

These reports highlight the fact that there is much room and need for improved integration and use of biodiversity data. At present many Local Authorities and other organisations do access local biodiversity data largely from Local Records Centres and do use this data to some extent. This remains the key, and often only, method of local data delivery. A measure of how effective this data is being used is required. The measure should look at both data access and data use. We would suggest the following datasets to inform this indicator:

- 1. The number of local authorities, AONBs and National Parks which routinely use up-to-date data on protected and priority species supplied by their Local Records Centres.
- 2. The number of planning applications screened against biodiversity data (protected and priority species, Local Wildlife Sites and priority habitats).

Neither dataset would be difficult to collect or place unreasonable demands on those organisations responsible for reporting. It would also make local planning authorities publically accountable to local residents with regard to the consideration of biodiversity in the planning process.

There is much potential to expand the scope of datasets for this topic to fully measure the integration of the use of biodiversity data in local decision and to measure that use in other aspects of the work of Local Authorities especially. However we believe that this would be a good starting point which would provide data by which this topic could be properly measured.

There is a suggestion to "Possibly supplement the existing indicator using information on data downloads from the National Biodiversity Network Gateway by Local Authorities, if available." However Local Authorities need to be accessing the fullest range of available data. At present this data is largely provided by Local Records Centres at a local level. If a Local Authority does not have a Service Level Agreement with their Local Records Centre then they would not be able to access the necessary data via the NBN Gateway at the required resolution for the data to be useful. It is not just about data downloads but who is downloading it, how the data is used and how well it is interpreted. There are other methods of data delivery and it should be possible to incorporate the local delivery of data from Local Records Centres here. ALERC would be happy to contribute to the development of a more robust measure in this respect.

Local Records Centres are the key organisations in providing data for local decision making. This is only achieved by financial support through Service Level Agreements or other agreements with local authorities and other local organisations. Therefore another possible measure would be to record the amount of financial support provided by local authorities and other local organisations to Local Records Centres which supports the delivery of data for local decision making.

Indicator 12: Innovative financial mechanisms

ALERC would like to express its support for the suggestion by the NBN Trust for "A levy on all planning applications, proportionate to the size of the proposed development, to generate income for Local Authorities to be ring-fenced to support biodiversity data provision by the voluntary sector."

We believe that it should be specified that this money is used to support:

- 1. Local Records Centres, and through them local recorders;
- 2. the collection of data through the support of Local Wildlife Sites systems.

These would provide information required by many of the other indicators. It is vital that there is a robust and up to date Local Wildlife Site system to support many of the aims and commitments set out in the Natural Environment White Paper, the National Planning Policy Framework, the England Biodiversity Strategy and to provide local data users access to up to date and relevant data.

This would provide support of both volunteer recording, Local Records Centres and Local Wildlife Site systems where support might be reduced by spending cuts and shift some of the financial support requirements away from national and local government.

15 Trends in pressures on biodiversity (climate change impacts, pollution, invasive species)

Many local records centres collate and manage data on invasive species, and are collaborating with local invasive species initiatives where these have been set up. The sources of LRC-held data include structured and unstructured data from the voluntary and public sectors. Data are also contributed at a national level to the NBN Gateway via the Recording Invasive Species Counts (RISC) project.

With some guidance and the establishment of a national approach, LRCs could provide both extent and management data on invasive species in their operational area.

17 Availability of biodiversity data and information for decision making.

There is much development required here and ALERC would be pleased to contribute. It is important that this measures the availability of the most useful data. This topic fails to mention the data made available locally by Local Records Centres which is the main method by which data is made available at a local level. We would suggest the following measures as a starting point:

- 1. Number of records held by the NBN Gateway to which national decision makers have full resolution access. This is a good measure of the availability of the most useful data on the NBN Gateway. Decision makers could be defined as Defra and Defra agencies.
- 2. Number of digital records held by or accessible to. Local Records Centres (including the number of records on the NBN Gateway to which LRCs have full resolution access). As a key local source for biodiversity data this will give a good measure of number of records most easily available to local decision makers.
- 3. Number of local authorities in England that are current partners in Local Records Centres partnerships.

It would also be possible to include a measure of data use from the NBN Gateway and data searches undertaken by Local Records Centres and for what reason the data is being used.

Q2. *Identifying preferred options.* Indicators should be:

- a. Relevant to the Strategy
- b. Easily communicated to a non-specialist audience
- c. Based on suitable, high quality data sets (e.g. with a time series > 5 years, of known precision, with representative geographic coverage, regularly updated, and with a published methodology)

In addition, the indicator set should be compact and comprehensive and not place substantial financial burdens on the public sector.

Which of the options set out in the discussion document, or that you have identified in Q1 above, best meet these requirements?

Enter your comments here. Please state which indicator topic(s) you are addressing. Topic 1.

Status of priority habitats (England and UK) especially informed woodland and other Habitat Inventories: these would need to be more regularly updated and include condition data from other datasets where available or quality BARS data where available.

Topic 3.

Develop a new indicator of 'structural' connectivity or fragmentation measures based on, for example, site boundary data on nationally and internationally protected sites, local sites including Local Wildlife Sites, woodland and other habitat inventories, Nature Improvement Areas and other landscape-scale initiatives.

Topic 4

Status of priority species based on data available on the NBN Gateway based on data from structured voluntary sector surveys, monitoring surveys by Environment Agency and Natural England, data from Local Records Centres and data from ecological consultants.

Topic 5

The species chosen need to be decided by consultation with the voluntary sector in particular to identify the best datasets and thus the species to monitor.

Topic 11

The preferred option is to develop new and relevant datasets, as outlined in Question 1, rather than using an indicator that is not closely related to the topic.

Topic 12

A levy on all planning applications, proportionate to the size of the proposed development, to generate income for local authorities to be ring-fenced to support biodiversity data provision by the voluntary sector.

Topic 17

The preferred option is to concentrate on the availability of the most useful data. This would be data available at full resolution on the NBN Gateway and digital records held by Local Records Centres.

Q3. Do you have any other comments on the proposed set of indicator topics or development options?

Enter your comments here.

ALERC would like to express its disappointment that the datasets listed do not recognise the value and importance of data held by Local Records Centres. Local Records Centres are vital in the collation, collection and delivery of biodiversity data locally and contribute significantly to national datasets. However Local Records Centres are not mentioned in this document. Local Records Centres work closely with Local Authorities to allow and improve the integration of biodiversity data into local decision making (Indicator Topic 11) but again Local Records Centres are not mentioned. In this respect Local Records Centres should be mentioned as the key provider of data for local decision making. Locally delivered data can have added value including local contextual information which differentiates the data from that on the NBN Gateway. Essentially Local Records Centres act as local nodes for the NBN Gateway and even if data is supplied via the Gateway the Local Records Centres will be key in working with local partners to support, encourage and develop the use of data delivered in this way.

Along with the data held by the NBN Gateway, national recording schemes and the voluntary sector, including organisations such as the British Trust for Ornithology and Butterfly Conservation, Local Records Centres hold key datasets and work closely with local voluntary recorders and groups as well as ecological consultants. Local Records Centres also work closely with the NBN Trust and Natural England to make data available. Local Records Centres will be significantly contributing to the datasets required for many of these indicators and the development of datasets that are needed to allow their status to be considered green.

Topic 4: Changes in the status of threatened species on protected sites may not be a useful proxy for national trends. If BARS is to be used as a source of data, there needs to be greater incentives for using the system and keeping information on BARS up-to-date. The main users of BARS in the past have been those working on Local Biodiversity Action Plans and discrete projects rather than the National Agencies, however there is almost no mention of Local BAPs and the contributions they make in the new Strategy.

An additional indicator topic is required to measure the availability and take-up of taxonomic education, particularly in botany, fungi, lower plants and invertebrates. Citizen science and public engagement initiatives are introducing people to recording but further effort is required to pass on expertise in the more challenging taxonomic groups before it is lost. Without this baseline expertise we will not be able to measure biodiversity effectively in 2020 and beyond.

The final set of indicators should not simply reflect what information is already available. If the UK is to show environmental leadership, as promised in The Natural Environment White Paper, then there needs to be a commitment to developing robust indicators using appropriate relevant data.