

**LOCAL GOVERNMENT NATIONAL INDICATOR SET TECHNICAL HANDBOOK - RESPONSE TO CONSULTATION DOCUMENT**

**Name and address of responding organisation:**

**Devon County Council  
County Hall  
Topsham Road  
Exeter  
EX2 4QR**

**Is this your organisation's official response to the consultation? Y/N**

**Name and phone number of key contact in case of follow-up queries:**

**Craig Dixon 2804**

**National Indicator Number:**

**197**

*Please complete a separate form for each indicator on which you wish to respond*

<b>Indicator Issue</b>	
<b>1. Is the Technical Definition of this indicator clear?</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If NO a. What aspects of the technical definition of the indicator are unclear? Please specify clearly - is it in relation to the measurement method, or - on reporting b. Please suggest how the template can be clarified/improved.	<b>Generally, the definition is clear. However, it is not clear by what mechanism one assesses if the advice / management plans are being acted upon. Also, the formula used to calculate the indicator is not immediately transparent.</b>
<b>2. Does the Technical Definition for this indicator have any unintended consequences?</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If YES a. What are the unintended consequences on this national indicator? b. Can the unintended consequence be avoided? If so, how?	<b>It will require additional resources to be allocated to local sites by LA. This could be viewed as a positive outcome, unless it results in the</b>

	<b>reallocation of funding from other areas of biodiversity work.</b>
<b>3. Will the Technical Definitions for this indicator work in practice?</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If NO a. Why would this technical definition not work in practice?	But there are resource implications and, ultimately, it is a proxy indicator (it will not tell you about the effects of the indicator).
<b>4. Is this indicator defined at the right spatial level?</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
a) If not, what level should it be defined at? (including whether information is already gathered and/or reported at that level and if so where, if not, estimated cost of collecting and reporting it)	Because it should cause districts and counties to work in active partnership, but the overall figure for the county will be dragged down by poorly performing districts (over which the county may only have a limited influence in this context). It is not clear to me the degree to which districts or counties will be held responsible for the indicator.
<b>5. Should data for this indicator be provided for any or all of the different equalities strands (please tick the relevant box)?</b>	Ethnicity <input type="checkbox"/> Gender <input type="checkbox"/> Religion <input type="checkbox"/> Age <input type="checkbox"/> Sexual orientation <input type="checkbox"/> Disability <input type="checkbox"/> Other <input type="checkbox"/> (Please specify)
a) For any boxes ticked at 5, is this information already gathered and/or reported and, if so,	

where? If not, what would be the estimated additional burden of collecting and reporting it?

**6. Further comments on the questions above and /or any other comments that are not covered above questions.**

This indicator does offer the potential to encourage the active management of local sites and, in an ideal situation, would result in districts, counties and unitary authorities working together to support this aim. This would be a positive outcome and it should be generally welcomed. However, there are a number of important factors that can influence this. The vast majority of local sites are not owned or managed by local authorities - they are in private hands. Also, the planning system is only ever going to be able to positively influence the management of a very few of these sites. So, to be successful against this indicator, LAs will have to coordinate their efforts and provide additional resources to proactively contact private owners, provide conservation management advice and then instigate an active programme of assessing if this advice is being implemented (at the moment I suspect that most Local Sites Partnerships are more actively engaged in survey and designation than in the provision of management advice and rarely, if ever, monitor the implementation of that advice; also, it would be wrong to assume that LAs are always the lead partner). This would be great, but would require the allocation of considerable additional resources for biodiversity, especially if it is not to deplete existing LA biodiversity work programmes.

Targeting the positive management of local sites should be a priority, but this indicator may prevent resources from being allocated to other, perhaps more important biodiversity monitoring. NI 197 will not demonstrate the effects of the management (ie. are priority habitats increasing in extent and improving in condition?). Indicators that directly enable the monitoring of trends in biodiversity are needed, particularly in relation to monitoring biodiversity policies in LDFs , and would inevitably also result in positive management being targeted at local sites. The resources proposed to be allocated to assessing the implementation success of the advice could perhaps be better allocated to assessing the habitats themselves. That said, NI 197 is a positive step and the inclusion of a biodiversity indicator within the Performance Framework is welcomed.

Completed versions can be sent to [niconsultation@communities.gsi.gov.uk](mailto:niconsultation@communities.gsi.gov.uk). Hard copy responses should be returned to Local Government Quality and Performance Division, Zone J2, 4<sup>th</sup> Floor, Eland House, Bressenden Place, LONDON, SW1E 5DU.