



## **Consultation matters determined by Delivery Group and Board**

**27<sup>th</sup> June 2025**

### **1. Incorporation of key systemic conservation planning principles**

A challenge from the consultation was whether the LNRS incorporated the principles of systemic conservation planning. Whilst these weren't consciously applied during Strategy's development, the principles provide a useful framework for review of the Strategy as it is finalised and also when considering consultation matters for discussion.

- Connectivity – does that plan allow for connectivity (the exchange of individuals, energy or materials) among habitat patches, populations, communities, or ecosystems.
- Adequacy – does the plan allow for enough of every habitat and species to ensure that it persists through time.
- Representiveness – does the plan represent and replicate the county's species, habitats, ecosystems, and ecological processes.
- Efficiency – does the plan deliver conservation outcomes whilst minimising impacts on the people, industries and communities that also rely on the natural resources.

**Decision:** The Delivery Group and Board considered that whilst the approach may not have been explicitly followed, all the principles were applied throughout the LNRS development and this comes across in the process followed and the resulting Strategy. It was therefore determined that such principles did not need to be visited retrospectively in the finalisation of the Strategy.

### **2. Extension of the Lawton principles for the LNRS**

A comment received stated that *"The Lawton principles are clear, repeatable and sufficiently broad to cover the two additional LNRS principles. We feel that these two additions weaken the Lawton vision and feel clumsy in comparison."*

The purpose of including nature-based solutions and land management and land use alongside the Lawton principles was to recognise the purpose and aim of the LNRS and frame the development of the Kent and Medway Strategy around this. As stated in the [LNRS statutory guidance](#):

- The main purpose of the strategies is to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment. The strategies do not force the owners and managers of the land identified to make any changes. Instead, the government is encouraging action through, for example, opportunities for funding and investment.
- Actions which support and draw on nature to provide wider environmental or societal benefits are called 'nature-based solutions'. Having both actions for nature recovery and nature-based solutions will help join up work to improve how land is managed for different environmental reasons and find activities that have multiple benefits.

The Kent and Medway LNRS principles were agreed early on in the strategy's development process and consequently were used in the selection of priorities and framing of related potential measures – so a change and removal of two principles at this stage could be problematic.

In terms of the LNRS covering these national priorities, nature-based solutions and land management are also covered by the 10 ambitions so were the two to be removed from the principles, the focus on action would not be lost.

Taking a wider look at feedback on the principles from the consultation, support for all was high – agreement on each principle ranged from 87% to 91% and the two principles added to Lawton's to create the Kent and Medway principles received a comparable level of support.

Better – 91%	Bigger – 89%
More – 88%	Joined up – 80%
Nature-based solutions – 89%	Land management and land use – 87%

On balance, given the strength of the support indicated for the six principles, it was proposed that no changes be made to six Kent and Medway LNRS principles.

**Decision:** The Delivery Group and Board were confident that the addition of these two principles did not dilute nor confuse the use of the Lawton principles. Further, it was noted that there was much discussion at the time on how to best embed nature-based solutions and land management into the LNRS, with their inclusion in the Strategy's framing principles the result of these discussions. Given this, and the strength of the support indicated from the consultation, it was determined that no changes would be made to the six principles.

### 3. Amendments to the LNRS ambitions

#### a) Nature-based solutions ambition

A response from the consultation noted that the ambition for nature-based solutions failed to recognise the opportunity presented for water resources and quality and that this should be reflected alongside climate change. On review of the ambition, it was acknowledged that it did miss reference to the other wider environmental benefits nature-based solutions offered.

**Decision:** Agreed that the nature-based solution ambition would be revised to: *Through safeguarding, management and restoration of the county's ecosystems, we enhance our resilience to climate change, deliver environmental improvements, address health and societal inequalities, and promote well-being, whilst advancing nature recovery.*

#### b) Species ambition

A response from the consultation suggested that the species ambition should put greater focus on the recovery of priority and threatened species. On review of the ambition, it was acknowledged that it did fail to acknowledge and embed the purpose of the LNRS's role in delivering the national species extinction risk targets:

- Halt the decline in species abundance by the end of 2030.
- Increase species abundance by the end of 2042 so that is greater than in 2022 and at least 10% greater than in 2030.
- Reduce the risk of species' extinction by 2042, when compared to the risk of species' extinction in 2022.

**Decision:** Agreed that the species ambition would be revised to: *Habitat management, restoration, extension or creation is specifically targeted to halt the decline, and support the recovery, of the Strategy's priority and threatened species and in doing so, reduces the risk of losing species through extinction from the county.*

In order to pick up the elements of the original ambition no longer included, it was agreed that Priority SP1 (see section 8.1.2) would be amended to: *During design of works to deliver a Strategy potential measure, the habitat assemblages of the species longlist (see Appendix 2.2) should be consulted for the relevant habitat and all action should consider and take account of the species that depend upon it, recognising and supporting the interdependencies that exist.*

And that an additional priority will also sit alongside that, Priority SP2: *Action design should also recognise the contribution that species may make to the habitat and utilises, where*

*appropriate, species within its management to help deliver more dynamic, natural, intact and climate resilient ecosystems.*

#### c) Land management ambition

A response from the consultation suggested that the land management ambition should be refocused to read *"Land management and land use thought Kent and Medway not only delivery nature recovery but also meets the economic and social needs of the county"*.

**Decision:** The Delivery Group and Board noted that the land management ambition presented in the consultation document was written as such to acknowledge that food security and a sustainable business is farming's first priority – both the NFU and CLA previously noted their support for the focus being this way. It was also highlighted that agreement with the ambition was also high – 89% agreed with it as presented. Consequently, it was determined that the ambition should remain as originally written: *Land management and land use throughout Kent and Medway not only meets the economic and social needs of the county, but also delivers nature recovery gains.*

## 4. Provision for soil within the Strategy

A response from the consultation suggested that soil as a habitat in its own right is not sufficiently represented and only mentioned in the context of its support of above ground habitats. Whilst soil is not included in the Strategy's overarching ambitions it does feature across all aspects of the LNRS. This includes:

- i. A dedicated priority under nature based solutions, with associated potential measures: *NBS3 Improve soil health and structure by enhanced and increased soil management, so that it is delivering better for invertebrates, carbon sequestration, water retention and management, and production and provisioning services.*
- ii. Measures under the land management and land use ambitions:
  - LM1 (nature friendly farming): *Application of regenerative principles of land management including limiting soil disturbance; maintaining soil cover; fostering agricultural diversity and rotations; keeping living roots in the soil; integrating livestock and arable systems.*
  - LM3 (prevention of agricultural pollution): *Adaptive and judicious grazing/better grazing practice to keep more soil carbon.*
- iii. Specific mention in Priority GL3 *Existing species-rich lowland meadow is safeguarded from loss, restored to better condition and extended through sensitive land management practices to reduce soil nutrient levels. Through the extension of lowland meadow, this habitat is better connected, reducing the risk of isolated meadow species and declines in species richness.*

- iv. Measure under GL5 (arable wild plants): *GL5.3 Design and deliver location and soil appropriate projects, targeted in the richest arable plant areas and on a variety of soil types, to create new, large areas dedicated to the promotion of arable wild plant diversity and abundance.*
- v. Specific mention in the woodland, trees and hedgerows ambition: *Kent and Medway's native woodland, trees and hedgerows are safeguarded from loss and under appropriate and active management, delivering robust ground flora and soil structures. A mixture of natural regeneration and new establishment, improves connectivity and provides an even greater contribution to climate change mitigation and resilience.*
- vi. Measures for soil within the woodland, trees and hedgerows priorities:
  - WTH1 (existing woodland): *WTH1.1 Holistic management of woodlands and transitional open spaces to sensitively consider the understory, ground flora and soil.*
  - WTH8 (hedgerows): *Maintain a varied structure so there are some taller, denser areas and emergent trees, with tree root systems contributing to soil health, mycorrhiza and biophytes.*
- vii. Measures for soil within freshwater priorities:
  - FW3 (freshwater supply): *Manage natural habitats and farmlands to maintain and restore infiltration ability by prioritising soil health and groundcover.*
  - FW6 (chalk streams): *Improve soil health and structure and restore grasslands to support recharge.*

The difficulty lies in a lack of sufficient data and evidence to enable any meaningful mapping of potential measures for a soil focussed priority. Plus the absence of an up to date national strategy for soil health means there is little to frame local priorities and action around, as to enable delivery.

**Decision:** The Delivery Group and Board determined that there was sufficient reference to soil and that, in fact, its consideration was stronger than previously provided for in past biodiversity strategies. Whilst there would not be a standalone priority for soil, it was agreed that revision of the LNRS should ensure it is properly covered in the pressures section and that cross references are made within land management ambition, so that it is clear that there are other measures for soil under other ambitions for LNRS. It was also noted that future improvements in spatial data may allow us to be more focussed in future iterations

## **5. Provision for semi-improved grasslands within the Strategy**

A response from the consultation noted that semi-improved grasslands are not given consideration in LNRS. The response noted that semi-improved grasslands are on a spectrum between those that are slightly better than improved grassland to those that are a hair's breadth from being species rich unimproved grassland – not mapping their location or recognising their importance for the restoration of priority habitats is a missed

opportunity. Enhancing semi-improved grassland to priority grassland habitats would be easier to achieve and in a shorter time period, than creation on arable or modified grassland. The response proposed a new measure under the priority for species-rich lowland meadow (GL3) to address this gap: *Create new species-rich meadows and pastures from semi-improved grasslands and good quality semi-improved grassland.*

**Decision:** The Delivery Group and Board considered that this went in to too much detail, with this already sufficiently covered by the broader measures for lowland meadow. It was also noted that this would be a difficult measure to map, because of the extent of semi-improved grasslands in the county – i.e. too broad coverage to provide a suitable map. However, the intrinsic value of semi-improved grasslands was noted and that whilst semi-improved grasslands do not have the range and number of grass and wildflower species associated with unimproved species-rich grassland, they still support significant, and sometimes rare species and, under appropriate management, they hold considerable potential to return to species-rich grassland. It was determined that the introductory text needed to better reflect the potential value of semi-improved grasslands. And that, instead of a specific potential measure, there should be a note under land management for lowland measures, that where looking to deliver on this priority, first consideration should be given to delivering through semi-improved grasslands.

## **6. Provision for sand dunes within the Strategy**

A response from the consultation noted that sand dunes are not a featured habitat within the priorities for either the coastal or successional habitats ambitions. The response noted that there are a number of LNRS priority species reliant on sand dunes in varying successional stages; all at risk from coastal processes with no room to move. Consequently, they proposed that sand dunes have a dedicated priority.

**Decision:** It was agreed that sand dunes should have a dedicated priority under the coastal ambition, that being: *Priority CL9 - Restore sand dunes, enabling, where possible, the natural mobile function of the dune system to be reinstated or use management to maintain a full range of successional stages of sand stabilisation across the dune system.* With potential measures of:

- CL9.1 (better) – *Management of scrub encroachment and removal of invasive species, with Year round low intensity grazing in the absence of endectocides and with high quality fodder in winter to maintain high dung quality.*
- CL9.2 (better) – *Manage and maintain a full range of successional stages of sand stabilisation across the dune system, from mobile sparsely vegetated foredunes, young dunes with dense Marram Grass clumps, to more established dunes with varied vegetation, stable sandy grassland or heath, open sandy areas and dune slacks.*
- CL9.3 (better) *Reduce disturbance pressures of recreational activities*

- CL9.4 (bigger) – Address overstabilisation of the dunes to increase dune mobility and sand movement.
- Land management measures: Maintain the water table in dune slacks but not to deepen them, to make them permanently wet; and Discourage the removal of biodegradable material from the foreshore and dune.

## **7. Necessity for discrete priorities for chalk rivers and clay rivers**

The Environment Agency have proposed that the priority for clay rivers be removed from the LNRS (Priority FW7 - *Clay rivers have a more natural channel form and processes, without physical modifications and the impacts of historic alterations, and are connected to a mosaic of wetland habitats along the floodplain and headwater streams*).

Subsequent discussion of this proposal resulted in the suggestion that the same should be applied to the priority for chalk streams (Priority FW6 - *Chalk streams reach, at minimum, Good Ecological Status or Potential, and provide high quality river habitat with a natural channel form and processes, supporting characteristic flora and fauna, natural and resilient flows along their permanent length, and well managed ephemeral headwater streams. Quality and quantity of water supporting chalk streams and the groundwater bodies they rely on is safeguarded*).

This is not to suggest that clay rivers and chalk streams are not an important river type within the county but acknowledges that the measures currently identified for clay rivers are a repetition of those provided by the first four freshwater priorities, which focus on the establishment of river systems with:

- More natural shape and function (FW1)
- Clean supply (FW2)
- Sufficient supply (FW3)
- Wider and more natural associated habitats alongside (FW4)

**Decision:** It was agreed that priorities for clay rivers and chalk streams should be removed. The Delivery Group and Board were keen to stress that they considered both freshwater features very important to the county's nature and acknowledged that in the case of chalk streams, were important to the national resource. However, they determined that both should be removed as standalone priorities on the basis that they would be sufficiently provided for by priorities FW1-FW4. This was also on the understanding that there would be a more detailed section on the two river types as part of the introduction to the freshwater section, clarify that priorities FW1-4 also related to chalk and clay rivers and, if needed, clay river and chalk stream specific potential measures under priorities FW1-FW4.

## **8. Proposal for the area between the rural settlements of Tyler Hill and Blean to be included in the ACIB**

18 emails were received relating to just one matter – a proposal for the area between the rural settlements of Tyler Hill and Blean to be included in the Areas that Could become of particular Importance for Biodiversity (ACIB). Although separate submissions, all came with largely the same request and where justification was provided, this stated that:

- The area is of strategic importance to the Blean ancient woodland, providing green corridors for wildlife including a number of rare species
- There is great potential for improved biodiversity in the fields that have been farmed, while the hedgerows, Sarre Penn stream and areas of ancient woodland already support key species.
- The area falls within Kent Wildlife Trust's Blean Wildscape Strategy and Keep Blean Green Campaign.
- The area is within the catchment of the Stour River, meaning the land and the Sarre Penn are important for nutrient neutrality and nature protection work.
- Presence of Turtle Dove and Nightingale.
- Potential for nature based solutions.
- Local support for the area, demonstrated by a petition to preserve and enhance the Blean for future generations.
- The need to safeguard and protect its ecological and public value.
- Area is vulnerable to potential housing development making urgent recognition crucial; vital to protect the area from potential housing development that would negate any possible wildlife or human corridors in the future; area urgently needs to be protected from any encroachment by housing.

**Review of LNRS ambition-based arguments** - Mapping of the various connectivity measures does identify some of the area proposed but there is a notable part that has not been identified within the connectivity modelling. Although none of the connectivity ambition mapping was used in the ACIB baseline, the modelling was used as refinement for the ACIB so theoretically, if measures were mapped in this area and did represent an important area for connectivity, it would have been included.

Similarly, some of the area proposed is also included in the mapped measures for ancient woodland, hedgerows and nature friendly farming however once again a notable part has not been. This is likely because measures not compatible with allocated sites have been excluded from the mapping – land north to the University of Kent is currently allocated for housing development in the draft Local Plan. The approach of excluding already allocated sites from measures that could not be delivered within development was one determined by the Data, Evidence and Mapping Technical Advisory Group and agreed by the supporting authorities group, Delivery Group and Board.



It is important to note that an area isn't just "added" to the ACIB. To be within the ACIB it must be associated with a mapped potential measure and that mapped measure must be one used to create the ACIB; not one mapping the wider opportunities – i.e. the area must have been identified as a priority area for the delivery of one or more potential measures. At the end of the document is the maps for the only ACIB featured potential measure mapped to the area of concern.

It is also worth noting that areas of ancient woodland will not feature within the ACIB. As an irreplaceable habitat, this is already covered by the Areas of Particular Importance for Biodiversity and, by the LNRS regulations, can only be included in this mapped area and not the ACIB as well. The coverage of the area from the APIB and ACIB is shown in maps at the end of the document.

**Review of relevance of area to priorities outside the LNRS** – local, county and national priorities have been considered within the development of the Strategy. The role of the LNRS mapping is to then set these in a strategic context, so that the LNRS focuses on those determined as most critical to the recovery of nature for the county. It is therefore possible that a local priority, however important it is at a local or district level, may not be included when considered within the strategic-county context.

It is worth noting, given the reference to Kent Wildlife Trust, that the Trust are represented on all the advisory and steering groups and the Board, so have been closely involved in the mapping, decisions and outcomes. Kent Wildlife Trust's consultation response to the LNRS did not raised this area as a concern.

**Review of need for protection of this area** - It is apparent from the responses that the LNRS is considered as a means by which areas can be protected and development can be prevented. However, this is not the case. The purpose of the Strategy is to provide a framework for nature recovery, directing action to where it is most needed and where it will deliver the greatest gains. It does not offer any formal, or otherwise, protection which can only be provided through statutory designations or local planning policy.

The Strategy is also not designed as a tool to prevent development nor does the identified "areas that could become of particular importance for biodiversity" preclude development. However it will aid the delivery of good, well-placed and well-designed development and guide development in maximising positive outcomes for nature through its role in informing local planning and biodiversity net gain. Even if this areas was included in the ACIB, it would not prevent the objected to development from proceeding.

**Decision:** The Delivery Group and Board concluded that, on review of the responses, there is currently no definitive reason centred around the LNRS priorities or mapped potential measures why the area around Tyler Hill and Blean should be identified as a strategic priority - albeit that it may have, like other areas, local potential for nature

recovery. It was therefore determined that the areas would not be included in the Areas that Could become of particular Importance for Biodiversity (ACIB).