



Consultation outcomes report - Response to findings of public consultation January-March 2025

June 2025

Executive Summary

Introduction

The draft Kent and Medway Local Nature Recovery Strategy (LNRS) sets out the county's priorities for nature recovery and the recommended actions to deliver these. This Strategy also identifies where in the county this action should be targeted, to deliver the greatest outcomes for the county's habitats and species.

The Strategy was prepared by Kent County Council (KCC), who were appointed as Responsible Authority by Defra and provided with a grant to undertake the work. The LNRS is one of 48 strategies across England, with the shared aim of halting and reversing the decline of nature.

The draft LNRS for Kent and Medway was developed with extensive input from partners and stakeholders across 2024, with over 1,000 individuals attending various events designed to enable full participation in the process, which was open to anybody who wished to participate.

On 16th January 2025, an 8-week consultation was launched running until 12th March 2025, which received 330 responses.

Three reports on the public consultation have been produced:

1. Independent analysis of the consultation results by Lake Market Research – the consultation report.
2. The Responsible Authority's (KCC's) initial response to these findings.
3. Consultation outcomes report (this report) – a detailed response from the Responsible Authority (KCC) to the findings and conclusions of the Lake report, including the resulting amendments to be made to the Kent and Medway Local Nature Recovery Strategy.

Decisions regarding key aspects of the Strategy's finalisation were made by the Species Recovery Technical Advisory Group; Data, evidence and mapping Technical Advisory Group; and the LNRS' Delivery Group and Board who met to discuss and determine matters arising from the consultation on 26th and 27th June 2025.

Below is a short summary of the response to the consultation findings – more detail can be found in the main body of the report.

1. LNRS principles, ambitions or priorities

No major changes to Kent and Medway Local Nature Recovery Strategy's principles, ambitions or priorities will be made as a result of the consultation. The below sets out the actions that will be taken in finalising the strategic elements of the Strategy:

LNRS Principles

The LNRS principles will remain as presented in the draft Local Nature Recovery Strategy.

LNRS Ambitions

The nature-based solution ambition will be amended to better reflect the wider environmental benefits offered and will now read: *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.*

The species ambition will be amended to better embed the purpose of the LNRS's role in delivering the national species extinction risk targets and will now read: *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.*

No other amendments will be made to the remaining LNRS ambitions, which will remain as presented in the draft Local Nature Recovery Strategy.

Connectivity ambition, priorities and potential measures

Any measure using the term safeguard (for connectivity and other ambitions) will be reviewed and amended to better clarify the term within the measure itself.

Nature-based solutions ambition, priorities and potential measures

The introductory text will be expanded and the table on nature-based solutions will be amended to pick up missed services for freshwater habitats and coastal habitats.

Land management and land use ambition, priorities and potential measures

Technical corrections will be made to the introductory text and the section will better acknowledge the potential consequences of nature friendly farming techniques on reduced productivity, food security etc.

Grassland habitats ambition, priorities and potential measures

Better recognition will be given to semi-improved grassland, noting its intrinsic value and potential as an opportunity for conversion to species-rich grassland.

Successional habitats ambition, priorities and potential measures

No changes are planned to the priorities or measures with exception of those under scrub priority for scrub (SH2) to be revised to remove apparent contradiction. The term “brownfield” will be used alongside “open mosaic habitat on previously developed land” throughout the document.

Woodland, trees and hedgerows ambition, priorities and potential measures

Additional measures will be added to the ancient woodland priority (WTH5) to ensure continuity of ancient tree habitats. Advice will be taken from the Forestry Commission on the appropriateness of the 75m buffer applied in mapping and what the buffer should be defined in practice. The introductory text will be amended to also note the challenges with delivery and the issue of loss of trees.

Freshwater habitats ambition, priorities and potential measures

Priorities for chalk streams and clay rivers will be removed, on the basis that they are sufficiently provided for by the following freshwater priorities (full wording in Strategy):

FW1 a more natural shape and function for all rivers and streams.

FW2 freshwater habitats supplied with a clean supply of water.

FW3 freshwater habitats have sufficient supply and flow of water.

FW4 more natural associated habitats in wider strips alongside rivers and streams.

Provision for groundwater within the LNRS will be reviewed with the Environment Agency, South East Rivers Trust and SE Water to identify how this can be improved. Any measures that should already be covered by regulations will be identified in consultation with the regulators and removed/revised as appropriate. The introductory text for freshwater habitats will be amended to build on the existing discussion on water pollution sources.

Urban ambition, priorities and potential measures

The urban ambition, and all of the associated priorities and potential measures, will be thoroughly reviewed to ensure that there is no repetition and each of the priorities are clearly distinct from each other. During the revisions, the importance of buildings as a habitat for threatened species will be addressed in both the introductory text and within the measures. Advice will be sought from Natural England on the appropriateness of the additional potential measure to provide protection to existing nesting sites.

Coastal ambition, priorities and potential measures

The coastal ambition will have a new and additional priority, and associated potential measures, relating to sand dunes. Priority CL9 will be: *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.*

Priority CL5 on native oyster will be amended to *"Sustainable management of native reef building shellfish to allow them to reach their habitat providing potential"*, with potential measures included for both native oysters and blue mussels. Proposed additional potential measures for saltmarsh, and the appropriateness/feasibility of measures for seagrass and native oysters, will be reviewed by the Coastal Advisory Group before finalisation of the Strategy. The existing footnote that states managed realignment is only delivered where "both the natural and built environment is not at risk of inundation, damage or loss as a result of the action" will be brought into main text. And the need to involve all stakeholders in any measures affecting the fishing industry will be noted where relevant.

The coastal priorities will be reviewed in consideration of the coastal ambition to ensure they are supporting the vision set out.

LNRS priority species

Juniper will be added to the Strategy's priority species. The LNRS will not, in this iteration, prioritise species currently absent from the county. Suggested amendments or additions to potential measures identified for the priority species, and likewise habitat assemblages, were reviewed with the Species Recovery Technical Advisory Group and adopted or not as appropriate. The LNRS priority species chapter will be restructured in order to focus on those needing bespoke measures for their recovery; and mapping will be created to help identify where action for the priority species would be best directed.

2. LNRS mapping

Further work is required on the LNRS maps ahead of publication – this largely relates to re-mapping based on new data sources; amendment or review of maps where queries have been raised; and the development of a new online platform for improved presentation and usability of the maps.

LNRS mapping - data

During mapping finalisation, up to date data sets (and any new) will be used where appropriate. Measures using urban data layers will either be re-mapped using a consistent approach or explain why different urban data sets have been; and measures identifying green space will be re-mapped using typologies of these spaces that align with those used by the county's local plans. Suggested errors in the data will be reviewed and addressed accordingly.

LNRS mapping – potential measures and Areas that Could become of particular Importance to Biodiversity (ACIB)

Where proposed additions and amendments to the mapping are backed with evidence and/or justification or a mapping mistake was noted, amendments, as appropriate, will be made. Queries on the mapping outputs were referred to the mapping team and Data,

evidence and mapping Technical Advisory Group for resolution as appropriate. The proposal for the area between the rural settlements of Tyler Hill and Blean to be included in the ACIB was not accepted by the Delivery Group and Board.

LNRS mapping – presentation of maps

A user-friendly online mapping tool, with functions as determined by consultation feedback and with further input from end users, will be developed to allow full and detailed scrutiny of the LNRS mapping. On the basis of all mapping being available online, removal of the county-scale maps from final Strategy document will be considered.

3. LNRS introductory, context setting and overview

The consultation raised points regarding the ease of understanding of the introductory, context setting and overview elements of the LNRS (as presented in part one of the consultation documents), plus highlighted points of improvement. The below sets out the actions that will be taken in finalising these elements of the Strategy.

Understanding LNRS priorities and measures (chapter 1 of part 1 and chapter 4 of part 2)

Additional clarification on some of the potential measures queried will be provided. When more than one measure has been identified for a location, robust guidance on how to prioritise the measures, will be developed and included. The online mapping tool will look for options on how to present this on a site basis. The guidance on how the LNRS will inform nature recovery, how to use the Strategy and how to use the mapping will be reviewed to ensure all audiences understand its application. Text on the role of the LNRS in planning will be aligned with the new planning guidance.

What is a Local Nature Recovery Strategy? (chapter 1)

The introduction will better explain how the LNRS will work across Strategy area borders and also the role of the LNRS in relation to health, wellbeing and access. The use of the term “safeguarding” in the Strategy will be better clarified.

Kent and Medway’s Natural Landscape (chapter 2)

National Character Area descriptions to be enhanced, and gaps in information filled, with additional details suggested by respondents (as appropriate). Associated maps of National Character Area and river catchments will be reproduced to a better quality.

What makes Kent and Medway’s nature so special? (chapter 3)

Further detail to be added on saline lagoons; maritime cliffs and slopes; and grasshoppers, crickets and allied insects.

A changing landscape (chapter 4)

In section 4.2, *changes in habitats*, narrative on the loss of habitat quality will be added, as will a short narrative on marine habitat change, in absence of data for a table.

In section 4.4, *influences on Kent's habitats and species*, the pressures section will be redesigned/structured to ensure the pressures aren't lost amongst the narrative and an infographic will be created to illustrate the pressures alongside the more detailed text. Pressures and challenges identified as missing, or requiring more detail, will be addressed.

Sections 4.5-4.8, *strategic context*, will be reviewed and amended accordingly to ensure the relevance of these strategies and plans to the LNRS is clear, setting out how the strategy/plan was used to inform the LNRS's development.

Nature recovery opportunities (chapter 5)

Chapter will be enhanced with additional detail provided by the "action for nature" mapping tool. Details of community-based initiatives will be added.

General edits and additional work

Across all LNRS documents there are a number of general edits and additional work to address points raised during the consultation:

- Edits for matters of accuracy/technical corrections and additional detail provided.
- Plain English edit, use of a professional editor before publication and avoid use of acronyms and abbreviations.
- Alongside the full document, to look at developing online toolkits, aimed at particular audiences and/or focussing on specific elements of the LNRS.
- Alongside the full document, to aim to make use of the website and use that to break the Strategy into easier to digest sections, in an easier to navigate online format.
- Consider the development of a video explaining the full Strategy.
- Consider the creation of a short and meaningful strapline that sums up the Strategy and its intended purpose.

Other points raised

Some feedback was received during the consultation in relation to KCC's role as Responsible Authority. To clarify, the Local Nature Recovery Strategy has been entirely funded by a Defra grant – all costs associated have been covered by the grant from central government. The Strategy is not a KCC Strategy – the authority, along with 48 other upper tier county and unitary authorities, were appointed by Defra as the authority responsible for preparing it in consultation with partners and stakeholders.

A significant number of the comments received were relating to national matters that are outside KCC's ability or position to address. However it is important for these to be recorded and noted. As Natural England and Defra will be receiving a copy of this report, they will be brought to the attention of the relevant bodies.

1. Introduction to the Kent and Medway Local Nature Recovery Strategy

The draft Kent and Medway Local Nature Recovery Strategy (LNRS) sets out the county's priorities for nature recovery and the recommended actions to deliver these. This Strategy also identifies where in the county this action should be targeted, to deliver the greatest outcomes for the county's habitats and species.

The Strategy was prepared by Kent County Council, (KCC) who were appointed as Responsible Authority by Defra and provided with a grant to undertake the work. The LNRS is one of 48 strategies across England, with the shared aim of halting and reversing the decline of nature.

The draft LNRS for Kent and Medway was developed with extensive input from partners and stakeholders across 2024, with over 1,000 individuals attending various events designed to enable full participation in the process, which was open to anybody who wished to participate.

Once published, the Strategy has the potential to be a real game changer for nature recovery work, with the LNRS being linked to local planning and to various funding and investment streams. The intention of the Kent and Medway LNRS is to direct action and investment to areas where it is needed and will achieve the most. The aim is also for the LNRS, through its role in planning, to steer losses and impacts away from the county's most valuable natural assets.

The Strategy is framed around the Lawton principles and aims to deliver a better, bigger, more and joined up natural environment. It is also developed on the basis of better consideration of land management and land use, so that we can work with nature and use natural processes to tackle the challenges our county faces.

The Kent and Medway Nature Recovery Strategy has ten ambitions for nature recovery, that the 53 more detailed priorities, and their associated potential measures, sit under:

1. Connectivity
2. Nature-based solutions
3. Land management and land use
4. Species
5. Grasslands
6. Successional habitats
7. Woodland, trees and hedgerows
8. Freshwater
9. Urban
10. Coast

The Local Habitat Map for Kent and Medway is a key part of the LNRS, comprising of the “Areas of Particular Importance for Biodiversity” (APIB), areas already afforded protection, and the “Areas that Could become of particular Importance for Biodiversity” (ACIB), the target areas identified by the LNRS as the focus for the delivery of the Strategy’s potential measures.

Many of the potential measures identified in the LNRS have been mapped, targeting their delivery to where they would best be implemented with a focus on greatest need or opportunities for greatest benefit.

Whilst the Strategy makes no requirement for its measures to be implemented, it offers a comprehensive guide to nature recovery that will present many strategic and financial benefits to farmers, landowners, planners, developers, community groups and others, in taking forward the measures.

The Strategy also identifies some 141 priority species from a long list of 1,503 species assessed as rare, threatened or significant within the county that action should be focused on.

2. Background to the public consultation and this report

On 16th January 2025, an 8-week consultation was launched running until 12th March 2025. The consultation invited residents, stakeholders and other interested parties to provide views on the draft Kent and Medway Local Nature Recovery Strategy. The consultation questionnaire provided the opportunity to comment on:

- The process of developing the Strategy and how useful the resulting Strategy will be in informing nature recovery within the county.
- Whether the Strategy sufficiently provides the context for the need for nature recovery and how this will be delivered.
- The principles, vision and priorities for nature recovery in Kent and Medway.
- The potential measures (suggested actions), and areas identified for where these actions would best be delivered, to support the recovery of nature.

There were 264 questionnaire responses to this consultation; 254 online and 10 via paper/email. An additional 66 emails/letters were received providing feedback.

Three reports on the public consultation have been produced:

1. Independent analysis of the consultation results by Lake Market Research.
2. A next step's document – the Responsible Authority's (KCC's) initial response to these findings.
3. Consultation outcomes report (this report) – a detailed response from the Responsible Authority (KCC) to the findings and conclusions of the Lake report, including the resulting amendments to be made to the Kent and Medway Local Nature Recovery Strategy.

Decisions regarding key aspects of the Strategy' finalisation were made by the Species Recovery Technical Advisory Group; Data, Evidence and Mapping Technical Advisory Group; and the LNRS' Delivery Group and Board who met to discuss and determine matters arising from the consultation on 26th and 27th June 2025. Notes from these meetings can be found on the [Making Space for Nature website](#), but the detail on how all the amendments are being taken forward are in the consultation outcomes report you are reading.

The consultation outcomes report provides a response to the findings and conclusions of the Lake Market Research report and presents proposed amendments to the Strategy and next steps in finalising the Kent and Medway Local Nature Recovery Strategy for publication. The report discusses the Local Nature Recovery Strategy's:

[Development](#)
[Area description](#)
[Principles and ambitions](#)
[Priorities and potential measures](#)
[Mapping](#)
[Priority species](#)
[Delivery](#)
[Clarity and ease of understanding](#)

It also addresses queries raised regarding [KCC's role as Responsible Authority](#) and details [feedback from the consultation that cannot be addressed by KCC](#).

3. What the consultation told us about the Local Nature Recovery Strategy's development

The consultation revealed that those who had previously engaged, largely found it a positive experience and there was an encouraging degree of satisfaction with the development process of the LNRS. 65% of all consultees agree it has been sufficiently comprehensive, participatory and based on the best available information (a further 17% partially agreed). Amongst those who had participated in the work to produce the LNRS, agreement increased to 77% (with a further 15% partially agreeing).

Responses from those who looked on the development more favourably noted that their experiences of being involved were positive – being both worthwhile and enjoyable. And that the high level of good quality engagement from a diverse range of organisations had led to a clear, robust and comprehensive Strategy.

Responses from consultees who considered that the development process had only been partially sufficient or not sufficient at all, suggested that concerns related to the need for a more knowledge driven approach and more detailed assessment of the opportunities and constraints. It also appeared that there were some concerns over the ability to influence the Strategy's development and the extent to which input during the development process actually influenced the resulting Strategy. There were also comments regarding the involvement of local planning authorities.

Whilst acknowledging the concerns highlighted, it is considered that the Strategy's development did adopt a knowledge-driven approach and, as a result of the stakeholder participation, ensured local knowledge and input was at the heart of the work. The work also enabled the opportunity to partake in the development through a number of different routes:

- 20 Strategy development workshops.
- Self-led workshops.
- Online surveys.
- Direct approaches to stakeholders and sectors for input to specific aspects of the Strategy.

Opportunities to get involved were promoted via social media, press and through partners and sector networks. It is estimated that well in excess of 1,000 individuals participated at some point in the Strategy development.

The development process was open and transparent, with reports from every workshop made available, detailing the outcomes of the workshop and how this would be used to inform the Strategy – all can be found online at [Strategy development - background information | Making Space For Nature Kent](#)

Of the 254 people that answered the question, 67% had not participated in any of the opportunities provided to develop the LNRS, which may go some way to explain their views on the development process.

All of the Strategy area's local planning authorities were involved in the Strategy's preparation. The Local Nature Recovery Strategy Regulations (2023) creates a Supporting Authority role within the development process of the Strategy and for the Kent and Medway LNRS, this referred to all of the Strategy area's local planning authorities and Natural England. The regulations require the Responsible Authority (Kent County Council) to take reasonable steps to involve, share information with and have regard to the opinions of supporting authorities. The Responsible Authority is also required to seek the supporting authorities' agreement to consult and to publish. This requirement was discharged in the following ways:

- Establishment of the Supporting Authority Group, served via the Kent Chief Planners Group. The purpose of this group was to act as a steering group for the LNRS development, providing oversight and guidance in order to ensure that the Strategy was developed in line with the district and borough aspirations for nature recovery, green infrastructure and wider environmental benefits; that the LNRS is compatible with local plans (and vice versa); and that the LNRS is a functional Strategy that can influence local planning and decision making.
- A dedicated LNRS project officer to work with the supporting authorities to facilitate their input to the Strategy development.
- Dedicated online briefing for local planning authorities at the start of the work.
- Involvement of every authority in the workshops.
- Dedicated one to one meetings with each planning authority regarding the LNRS mapping.
- Detailed review of all the local plans and strategies for each of the planning authorities (with LPA input), to ensure opportunities to support and align ambitions and targets were identified and to ensure the LNRS would work alongside the land use planning already in place for the county.
- Dedicated one to one meetings during the pre-consultation review period.

Although not classed as a supporting authority, parish and town councils were also engaged through contact via Kent Association of Local Councils and subsequently directly; dedicated online briefing at the start of the work; information collecting surveys; and attendance of workshops.

A further opportunity to input was via the "action for nature" and "priorities for nature" online mapping tools, which allowed people to pinpoint what measures were already being taken, and projects that were complete or underway; plus what action they wanted to see and where. Comments back from the consultation indicated that the Strategy hadn't made clear how these had been used in its development, so this will be addressed

in the finalised document. The “action for nature” submissions were used to build a picture of what has already been achieved and the gains on which we can build on. The “priorities for nature” submissions illustrated where opportunities for new gains and action exists; not only helping to inform the deliverability of the LNRS ambitions but also helping to identify where there are delivery partners ready and waiting when the Strategy is published.

In respect of the general approach to development of the Strategy, one of the responses suggested the need to incorporate the four principles of an approach known as systematic conservation planning:

- 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.

This comment was considered by the Delivery Group and Board on 27th June. It was their opinion 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.

4. What the consultation told us about the Local Nature Recovery Strategy's area description

4.1. Description of habitats, species and landscape features

67% of respondents agreed the LNRS sufficiently represents the significance of the county's landscape features, habitats and species, with 17% partially agreeing and 7% disagreeing.

Comments received in respect of the description included:

- Queries over the use of the National Character Area (NCA) as a basis for the description.
- Additional details to strengthen the existing description and raise the profile of specific areas that perhaps were not considered so notable or significant at the time of the NCA compilation.
- Include some commentary on access in the Strategy area.
- Need to fill gaps where detail is missing – for example, areas of significance for saline lagoons and maritime cliffs and slopes and overview of grasshoppers, crickets and allied insects.

The Strategy will continue to use the NCAs as a basis for the Strategy area description – the use of this was discussed and agreed by the LNRS Delivery Group, Supporting Authority Group and Board – however the additional detail provided by comments will be used to enhance this section and gaps will be addressed.

The images presenting the National Character Areas and the river catchments will be re-produced to provide better quality maps.

4.2 Description of habitats and species change trends

65% of respondents agreed the LNRS sufficiently outlined the trends of habitats and species change that the county has seen over the past decade, with 17% partially agreeing and 7% disagreeing.

Comments received in respect of the trends included:

- Lack of information on changes and losses in the marine environment, including historic declines in seagrass, oysters and saltmarsh.
- Section only discusses loss of habitat extent, not quality.
- Missing discussion of specific impacts on specific species.
- Nothing on species reintroductions and habitat creation.

- Does not consider the species that are thriving and habitats that are being well managed.

It is agreed that the habitat trend section would benefit from some text on loss of quality as well as quantity. The Kent habitat analysis did not include an assessment of marine habitat change but a narrative on this will be added to the text accompanying the habitat change table.

The other items noted as missing are already covered elsewhere in the LNRS:

- Specific impacts on species is covered in the priority species chapter (chapter 8).
- Gains such as reintroductions, habitat creation and successful species and habitat intervention are covered in the nature recovery opportunities chapter (5.1)
















4.3 Description of pressures, challenges and threats

57% agreed the LNRS identified all the key pressures, challenges and threats impacting on the county's natural environment. 26% partially agreed and 10% disagreed. The areas considered missing are listed below.

The majority of missing pressures are, as can be seen from the table below, already identified within the document (✓). This does however raise the question whether the pressures are lost within the narrative and the project will look to address this by how the pressures section is designed, including the possible production of an infographic to illustrate the pressures alongside the more detailed text.

Pressures/challenges noted as missed (✗) will be added to the revised Strategy. There were some pressures/challenges that whilst included within the Strategy, were acknowledged as an area which would benefit from some additional attention (👉). Comments received in respect of the technical accuracy or providing more evidence of the pressure will also be addressed within the edit.

Proposed pressure	Review outcome	
Air pollution	✓	Covered in section 4.4.2 on pollution.
Competing demands on land	✗	Much of the pressures listed are a result of this but it is not directly referenced. To be picked up more explicitly within section 4.4 on pressures.
Deer	✓	Covered in section 4.4.7 on land management.
Development in wrong places	✓	Covered in section 4.4.5 on built up areas.
Economic pressures, leading to unsustainable practices	👉	Covered in 4.4.6 on agricultural practices but would benefit from being more expressly said.

Proposed pressure	Review outcome	
Fragmentation		Covered in section 4.4.5 on built up areas.
Growth agenda		Growth is covered in section 4.4.5 on built up areas.
Heavy freight through Kent		Impacts of road is covered in 4.4.2 on pollution and 4.4.5 on built up areas but sections could benefit from acknowledgement that as gateway to Europe, Kent has a greater impact in this regard.
Housing development		Covered in section 4.4.5 on built up areas.
Immigration		Growing population covered in section 4.4.5 on built up areas.
Increasing horse ownership		Recreational disturbance covered in section 4.4.4 on human pressures.
Ineffective protection for designated sites		This is largely down to how the protection is understood and applied as a result of a lack of resources. Whilst this is covered to some extent in 4.4.10 on lack of funding and resources, this could be better drawn out in this section so will be revised accordingly.
Infrastructure development		Covered in section 4.4.5 on built up areas.
Lack of data, evidence and knowledge		Whilst the Strategy has identified the gaps in knowledge and noted these alongside the relevant priority, the pressures chapter doesn't actually make reference to it. A new sub section on lack of data, evidence and understanding and the impacts and limitations this results in will be added.
Lack of enforcement / policing		This is largely down a lack of resources. Whilst this is covered to some extent in 4.4.10 on lack of funding and resources, this could be better drawn out in this section so will be revised accordingly.
Lack of protection		This is largely down to how the protection is understood and applied as a result of a lack of resources. Whilst this is covered to some extent in 4.4.10 on lack of funding and resources, this could be better drawn out in this section so will be revised accordingly.
Light pollution		This is mentioned within section 4.4.5 on built up areas but would benefit from being expanded on. Will be revised accordingly.
Loss of nesting sites on buildings		This was a matter also noted as missing from the urban priorities chapter and will be picked up in both.
Man-made barriers on water courses		Covered in section 4.4.3 on water demand and management.
Pesticides		Pesticides are referred to in sections 4.4.1 on climate

Proposed pressure	Review outcome	
		change and 4.4.6 on agricultural practices but could also be discussed in 4.4.5 on built up areas and 4.4.7 on lack of appropriate land management. Will be revised accordingly.
Political pressures	✓	Arguably political pressures is something that applies to everything, not just nature recovery – everything is at the whim of a political/party. Considered sufficiently covered in section 4.4.10 on lack of funding and resources.
Pollution	✓	Covered in section 4.4.2 on pollution.
Public access	✓	Covered in section 4.4.4 on human pressures.
Quad bikes in woodland	✓	Recreational disturbance is covered in section 4.4.4 on human pressures.
Road development	✓	Covered in section 4.4.5 on built up areas.
Road use	✎	Impacts of road is covered in 4.4.2 on pollution and 4.4.5 on built up areas but sections could benefit from acknowledgement that as gateway to Europe, Kent has a greater impact in this regard.
Sea level rise	✎	Covered in section 4.4.1 on climate change. Add sea level rise to table within this section alongside coastal squeeze.
Soil pollution and health	✎	Covered in sections 4.4.1 on climate change, 4.4.2 on pollution, 4.4.4 on human pressures, 4.4.5 on built up areas and 4.4.6 on agricultural practices. But to ensure soil pollution and health is readily noted within section, will create a subheading within 4.4.2 consistent with those for water and air pollution.
Solar farms	✗	Pressure this places on land has not been addressed – will be picked up under section 4.4.1 on climate change, noting the land pressure that emerges from the need to find greener energy.
Surface water drainage	✗	Impact of poor surface water drainage to be addressed within section 4.4.3 – use of NBS also to be noted.
Trampling of habitats	✓	Covered in section 4.4.4 on human pressures.
Under grazing of chalk downland	✓	Covered under section 4.4.7 on lack of appropriate land management.
Water pollution	✓	Covered under section 4.4.2 on pollution.
Water pollution from sewage discharge	✓	Covered under section 4.4.2 on pollution.
Wind farms	✗	Pressure this places on land has not been addressed – will be picked up under section 4.4.1 on climate

Proposed pressure	Review outcome
	change, noting the land pressure that emerges from the need to find greener energy.

4.4 Strategic context

55% of respondents agreed the links between the LNRS and the county's local plans, strategies and the national targets and ambitions are clear. Given that just short of half of people only partially agreed or disagreed/were unsure, this would suggest that potentially more work is needed to be more clearly explain the relationship between the LNRS and other local and national strategic instruments. Comments on this section also indicated there may be occurrences of conflicting priorities.

The section of the LNRS providing the strategic context will be reviewed and amended accordingly, including the addition of some other strategies not currently referenced. The use of diagrams and infographics will be considered to better explain the how the LNRS sits within the wider strategic context.

The tables within section 4.6 (local strategic context for the Kent and Medway LNRS) and appendix 1.2 (local and national strategies) will be reviewed to ensure the relevance to the LNRS is clear and it is fully set out how the Strategy/plan was used to inform the Strategy's development.

Section 4.7 (national Strategic context for the Kent and Medway LNRS) will be edited to better draw out the other national strategies listed in appendix 1.2.

The purpose of the review of local plans and strategies and relevant national targets and ambitions was not only to use these to inform the LNRS and identify opportunities for the LNRS to support their delivery, but to also avoid the potential risk of conflicting priorities. This was especially important at the local level, with local plans being a key delivery instrument for the LNRS priorities. Hence all local plans underwent a thorough review and the county's planning authorities were fully engaged throughout the LNRS development process.

Concern was raised about the negative picture of development created. This will be amended to note that development does not have to be at the expense of nature, as long as development minimises its impact, puts in place suitable mitigation measures and fully compensates for losses it leads to.

4.5 Opportunities

Queries were raised about how data captured via the online mapping tools of "action for nature" and "priorities for nature" had been used to inform the Strategy. The "action for

nature” submissions were used to build a picture of what has already been achieved and the gains on which we can build on – this was used to inform the chapter on nature recovery opportunities in Kent and Medway (chapter 5). The “priorities for nature” submissions illustrated where opportunities for new gains and action exists; not only helping to inform the deliverability of the LNRS ambitions but also helping to identify where there are delivery partners ready and waiting when the Strategy is published.

It was noted that section 5.1 didn’t sufficiently acknowledge community-based initiatives and some corrective comments were also received.

Section 5.1, “Building on a solid platform of action for nature”, will be enhanced with additional detail provided by the “action for nature” mapping tool, with acknowledgement of where and how the information was derived so that those who contributed to the data collection can see how their input has been used. Details of community-based initiatives will also be added to section 5.1 and the corrections will be made.

5. What the consultation told us about the Local Nature Recovery Strategy's principles and ambitions

There was strong agreement with the six Strategy principles and associated ten ambitions, with nine in ten agreeing with each.

5.1 Principles

The table below shows the percentage of respondents agreeing with each of the Strategy principles. Very few consultees indicated they disagreed with any of the principles.

Better - Improve the quality of our existing habitats and ensure they are in a healthy and functioning state, by applying and resourcing better and appropriate management. We also need to better conserve and safeguard what we already have.	91%
Bigger - Increase the size of our most valuable and important habitat sites, not only extending but buffering, to protect them from the pressures of human influences.	89%
More - Through habitat restoration and creation, establish new, nature-rich sites that not only provide more space for nature but also provide connectivity between existing core sites.	88%
Joined up - Enhance connections between, and join up, sites, through improving the quality of the land that exists between, creating new physical corridors, and establishing 'stepping stones'.	89%
Nature-based solutions - Work with nature and use natural processes to tackle some of the socio-economic challenges our county faces, maximising the benefits of nature recovery.	89%
Land management and land use - Increase the number landowners, land managers and farmers utilising nature friendly and habitat sensitive land management and land use practices, recognising the crucial role they have to play in helping to deliver a better, more coherent and resilient wildlife network across the county.	87%

Comments in respect of the principles indicated that concerns related more to the delivery rather than issue with the principles themselves and that some of the identified pressures could stand in the way of achieving the principles.

One respondent queried the need to add to the Lawton principles by including those focusing on nature-based solutions and land management. This comment was considered by the Delivery Group and Board on 27th June 2025, within a dedicated meeting to review matters arising from the consultation. It was felt 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, no changes will be made to the six principles.

5.2 Ambitions

The table below shows the percentage of respondents agreeing with each of the Strategy principles. Very few consultees indicated they disagreed with any of the ambitions.

Connectivity – High quality habitats are connected at both a county and local scale, providing more linked natural space for nature to thrive in and a landscape that wildlife can move through and adapt to change in.	90%
Nature-based solutions – Through actions to safeguard, manage and restore the county's ecosystems, we maximise our resilience to the challenges of climate change, tackle health and societal inequality and deliver well-being benefits, whilst simultaneously recovering nature.	89%
Land management and land use – 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.	89%
Species – Habitat management, restoration, extension or creation considers and takes account of the species that depend upon it, recognising and supporting the interdependencies that exist. It also recognises 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.	89%
Grasslands – Our existing species-rich grasslands are conserved, with appropriate management returned to restore, connect and extend these habitats to deliver high quality, biodiverse and bioabundant areas across the county.	91%
Successional habitats – The structural diversity of open mosaic habitat found on previously developed land and low level scrub is safeguarded from loss and damage, for the benefit of species that rely on early successional habitats.	91%
Woodland, trees and hedgerows – 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.	93%
Freshwater – Our freshwater habitats are clean, sufficient and stable, in a healthy and good ecological state that supports an abundance and diversity of species. Catchments' functions are restored to deliver a connected mosaic of wet habitats, improving water quality and managing flood risk across the county.	93%

Urban – Nature plays a central role in shaping the county’s built-up environments, with wildlife provided for in a network of connected green and blue spaces, which are also designed and managed to provide nature-based solutions to the challenges facing those living in urban areas.	89%
Coast – Coastal and estuarine areas are allowed to evolve, with natural processes and progression restored where possible, to enable adaption and resilience to climate change. Management of habitat succession is delivered strategically and holistically, to minimise loss and support a range of high functioning, connected coastal habitats.	90%

As with the Strategy’s principles, comments on the ambitions indicated that concerns related more to the delivery rather than issue with the principles themselves and that some of the identified pressures could stand in the way of achieving the principles. All other comments and queries were only raised once – these did not represent shared views.

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. A revised ambition for nature-based solutions was agreed by the Board and Delivery Group on 27th June 2025, that being:

Nature-based solutions - 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.

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*”. This proposed change was considered by the Delivery Group and Board on 27th June 2025, where it was 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.

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, those being:

- 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.

A revised ambition for species was agreed by the Board and Delivery Group on 27th June 2025, that being:

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.

Given the strength of the support indicated for the remaining ambitions, no changes to these are proposed. In terms of the principle/ambitions presentation, it was suggested that the document could make it clearer how the visions, ambitions and principles interact – this will be addressed.

A response from the consultation suggested that **soil** as a habitat in its own right is not sufficiently represented and was 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. In addition, 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. The provision for soil within the Strategy was reviewed by the Board and Delivery Group on 27th June 2025. They determined that there was sufficient reference to soil and that its consideration was stronger than previously provided for in past biodiversity strategies.

Finally, in terms of the principle/ambition's presentation, it was suggested that the document could make it clearer how the visions, ambitions and principles interact – this will be addressed.

6. What the consultation told us about the Local Nature Recovery Strategy's priorities and potential measures

There was strong agreement with the LNRS priorities and measures. Support was particularly high for the potential measures.

Across the consultation there were minor queries seeking clarification on some of the potential measures, to help better understanding – all these will be addressed to ensure the required action is clear.

6.1 Connectivity

80% agreed that the identified priorities and measures for 'Connectivity' will achieve the specified ambition; 8% disagreed. Comments largely related to the challenges of delivery, rather than the priorities and measures themselves. The use of the term "safeguard" was queried.

Safeguarding is defined within the LNRS as *"In the context of this Strategy, this does not imply a formal protection nor prevention of potentially impactful activities, unless already identified within an existing and adopted local plan or an already established legal protection. Safeguarding may be delivered by setting aside the land but also refers to the use of active management that prevents loss and damage, the use of buffers to minimise human impacts and connecting habitats to increase resilience. Where measures refer to safeguarding areas, this does not mean that nothing can happen in these areas; rather that appropriate action should be taken within these areas to support the habitats and species they are notable for."* To ensure that this definition is not missed, any measure using the term safeguard will be reviewed and amended to clarify the term better within the measure itself, rather than rely on a footnote or reference to glossary.

6.2 Nature-based solutions

80% agreed that the identified priorities and measures for 'Nature-based solutions' will achieve the specified ambition; 10% disagreed.

Comments noted that the table on nature-based solutions had missed services for freshwater habitats relating to water quality, water supply and flood management; also noted that services for water quality had been missed for coastal habitats. Other additions were noted to strengthen introductory text for nature-based solutions. All will be picked up as part of the revisions.

6.3 Land management and land use

66% agreed that the identified priorities and measures for 'Land management and land use' will achieve the specified ambition; 16% disagreed. Comments largely related to the challenges of delivery, in particular the need to work with and support farmers and ensure appropriate financial incentives, much of which is outside the Strategy's scope. Comments suggested that waterways and rivers and soil health needed more attention than is currently provided by the land management and use priorities and measures.

As discussed under section 5.2, soil features across all aspects of the LNRS and was determined by the Delivery Group and Board on 27th June 2025 that at this stage provision for soil was sufficient – potentially as spatial data for soil is improved, future iterations of the LNRS may be able to include more focus for soil health.

Comments suggested that waterways and rivers needed further attention under land management and land use but it is considered that these habitats, and measures to manage impacts from land use, are sufficiently covered under the freshwater habitats ambition and anything further would result in a repetition of these.

Technical corrections were also noted, including the Hoo cluster missing from the farmer cluster list, the need to ensure the text on ELMS uses the Defra official wording and to include game and wildfowling land in the list of non-agricultural land. It was also suggested that the section should acknowledge the potential consequences of nature friendly farming techniques on reduced productivity, food security etc. These edits will be picked up as part of the revisions.

Finally, under measures, it was noted that nature friendly farming requires a lot of supporting drivers and mechanisms for it to be successful. This is something that is discussed further under chapter 7 of this report.

6.4 Grassland habitats

59% agreed the right grassland habitats have been identified as priorities; 24% partially agreed and 3% disagreed (14% unsure). In respect of the appropriateness of the grassland habitat measures, around eight in ten agreed with each and few disagreed with any of the measures presented:

- Chalk grassland – 79%
- Coastal and floodplain grazing marsh – 81%
- Species-rich lowland meadow – 79%
- Acid grassland and heathland – 78%
- Arable wild plants – 77%

Although 27% of respondents indicated they didn't completely agree that all grassland habitats had been identified, only one - **clay meadows** – was suggested as an addition. A review of clay meadows management, restoration and creation suggests that these would not require different measures to those currently laid out. It is not considered that anything in the LNRS on lowland meadow precludes or excludes clay; therefore it is clay meadows will not be treated as a separate priority to lowland meadows.

Better recognition will be given to semi-improved grassland, noting its intrinsic value and potential as an opportunity for conversion to species-rich grassland.

There were not many other comments made but of those that were, the majority related to the appropriateness of the mapped areas for the grassland measures.

6.5 Successional habitats

59% agreed the right successional habitats have been identified as priorities; 16% partially agreed and 4% disagreed (20% unsure). 64% agreed the measures for successional habitats are appropriate; 12% neither agree nor disagreed, 8% disagreed and 16% unsure.

It was noted in the comments that **sand dunes** were missing from the successional habitats priority, despite a number of the LNRS priority species being reliant on this habitat. Sand dunes will be given better consideration within the introductory chapter for successional habitats. The inclusion of sand dunes as a priority is further discussed under coastal habitats (section 6.9).

Challenges to the delivery of the measures was also highlighted, including prioritisation of space for successional habitats over other land demands, the need for regular management interventions and the misconceptions of such habitats as scruffy.

It was also apparent from comments that *open mosaic habitat on previously developed land* was not widely understood as the term for brownfield. And there was the perception that two of the measures under the priority for scrub (SH2) were contradictory. Both of these will be addressed within the edit.

6.6 Woodland, trees and hedgerows

64% agreed the right woodland, trees and hedgerow habitats have been identified as priorities; 19% partially agreed and 4% disagreed (14% unsure). In respect of the appropriateness of the associated measures, around eight in ten agreed with each and few disagreed with any of the measures presented:

- Existing woodland and trees – 83%
- Canopy cover – 82%

- Restoration of trees lost to disease, pests, climate change and drought – 83%
- Woodland resilience – 84%
- Ancient woodland – 82%
- Wet woodland – 82%
- Species rich hedgerows – 83%
- Traditional orchards – 84%
- Gill woodland – 71%
- Deer Management – 69%

Agreement was lower for gill woodland and deer management – but answers also indicated that this was likely as a result of unfamiliarity with the specialist habitat type and woodland management issue.

Comments received largely related to suggested additions to strengthen the introductory text for the woodlands, trees and hedgerows, challenges with delivery and concerns over the loss of trees.

For the measures, there was the suggestion that more needed to be done to future proof **ancient and veteran trees** for continuity of habitat and some discussion around the use of buffer zones for measures. Consequently, under WTH5 ancient woodland, additional measures will be added in to ensure continuity of ancient tree habitats. Advice will be taken from the Forestry Commission on the appropriateness of the 75m buffer applied in mapping and what the buffer should be defined as in practice, given potential issues with deliverability and possible conflict with local planning policy.

6.7 Freshwater habitats

58% agreed the right freshwater habitats have been identified as priorities; 23% partially agreed and 3% disagreed (16% unsure). In respect of the appropriateness of the associated measures, around eight in ten agreed with each and few disagreed with any of the measures presented:

- Restoration of rivers and streams to natural form – 85%
- Water quality of freshwater habitats – 82%
- Buffer strips – 82%
- Headwater streams – 80%
- Chalk streams – 81%
- Clay rivers – 81%
- Ponds – 85%
- Natural reedbeds – 80%
- Freshwater wetlands – 83%
- Lowland mire sites – 74%
- Semi-natural lowland drains and associated marshlands – 77%

Agreement was lower for lowland mire sites and semi-natural lowland drains and associated marshlands, but answers also indicated that this was likely as a result of unfamiliarity with these specialist habitat types.

Along with urban and coastal, the freshwater habitat grouping received a noticeably increased number of comments relating to the priorities and measures, despite the level of agreement being the same as for other ambitions. These included:

- Recognition and discussion of pollution sources in addition to sewage discharge and agriculture.
- Technical corrections in relation to some of habitat type descriptions and species names; catchment approach and associated partnerships; removal of reference to brackish water habitats.
- Suggestions that groundwater needed more attention.
- The necessity of some measures, which should already be covered by regulations.
- The necessity of a priority for clay rivers, given that the measures were a repetition of those already included in the first three freshwater priorities for riverways.

For freshwater habitats, more will be added in respect of pollution sources to build on the existing discussion on sewage discharge and agriculture. Measures for the freshwater priorities that should already be covered by regulations will be identified in consultation with the regulators and removed/revised as appropriate.

The provision for **groundwater** within the LNRS will be reviewed with Environment Agency, South East Rivers Trust and SE Water to identify how this can be improved in light of comments received from these partners.

As a result of comments received on dedicated priorities for **clay rivers** and **chalk streams**, at the matters arising from consultation meeting on 27th June the Delivery Group and Board considered whether these freshwater features required standalone priorities or were adequately covered already under the more general freshwater priorities and associated measures. In both instances, this proposed removal was 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 both 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)

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.

6.8 Urban environments

47% agreed the right areas of focus have been identified as priorities for urban areas. Despite this comparatively lower level of agreement, only 8% actually disagreed, with 32% partially agreeing and 14% unsure. Support for the urban priority measures was high, with over eight in ten agreeing with each:

- Habitat fragmentation of urban environment – 84%
- Public greenspace and land management – 87%
- Nature based solutions in urban environments – 85%.

Along with freshwater and coastal, the urban ambition received a noticeably increased number of comments relating to the priorities and measures, despite the level of agreement being the same as for other ambitions. These included:

- Repetition of aims and measures throughout the whole of the urban section, with the suggestion that it could be condensed.
- Difficulty with delivery for some of the proposed measures.
- The need to include private gardens as part of the solution.
- The need for public engagement.
- Prevention of inappropriate development.
- The need to better acknowledge that buildings are a key habitat for a number of threatened species both within the introductory text and in the measures. Also the suggestion that existing nesting sites should be protected.

The urban ambition and all of the associated priorities and potential measures will be thoroughly reviewed to ensure that there is no repetition and each of the priorities are clearly distinct from each other.

Private gardens and public engagement is already included under included under each of the urban priorities, even though such actions sit outside of the LNRS remit. It is therefore not possible to further actions in this regard however it is something that can be considered within the delivery phase.

In the reworking of the urban section, the importance of buildings as a habitat for threatened species will be stressed further, in both the introductory text and within the measures. The proposal to provide protection to existing nesting sites will be reviewed with Natural England – the LNRS cannot provide protection and therefore any measure in this regard will need to be designed accordingly.

Prevention of inappropriate, unsustainable development was a consistent ask across all ambitions not just urban. 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. It is therefore not possible, and not appropriate, to include specific measures that prevent development. The Strategy is not designed as a tool to prevent development nor do 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.

6.9 Coastal habitats

63% agreed the right types of coastal habitats have been identified as priorities; 19% partially agreed and 2% disagreed (16% unsure). Support for the coastal habitat measures was high, with most finding over eight in ten agreeing with them:

- Estuary and open coast management – 85%
- Saltmarsh and mudflats – 85%
- Seagrass – 84%
- Chalk cliffs and reefs – 78%
- Native oyster beds – 83%
- Saline lagoons – 81%
- Vegetated shingle – 81%
- Coastal wildlife disturbance – 81%

Along with freshwater and urban, the coastal habitat ambition received a noticeably increased number of comments relating to the priorities and measures, despite the level of agreement being the same as for other ambitions. These included:

- Technical corrections in relation to native oysters.
- A query whether the priorities marry to the overall coastal habitats ambition.
- The absence of sand dunes in introductory text and lack of a related priority.
- Concerns over loss of freshwater habitats as a result of managed realignment.
- Proposed additional potential measures for saltmarsh.

- Queries over the appropriateness/feasibility of measures for seagrass and native oysters.
- Proposed priority for blue mussels.
- The need to involve all stakeholders in any measures affecting the fishing industry.

The coastal priorities will be reviewed in consideration of the coastal ambition to ensure they are supporting the vision set out.

Sand dunes will be given better consideration within the introductory chapter for coastal habitats. Sand dunes are a significant habitat for a number of the LNRS priority species and for each of these, relevant potential measures have been identified. The Delivery Group and Board reviewed these on 27th June 2025 and determined that the Strategy would benefit from the inclusion of a standalone priority on sand dunes. Consequently the following priority and associated potential measures will be added to the LNRS coastal ambition:

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.

Potential measures:

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.

Under land management measures:

- *Maintain the water table in dune slacks but not to deepen them, to make them permanently wet.*
- *Discourage the removal of biodegradable material from the foreshore and dune.*

The potential consequences of **managed realignment** for freshwater habitats is already addressed in the Strategy by the footnote that managed realignment is only delivered where “both the natural and built environment is not at risk of inundation, damage or loss as a result of the action”. It is also noted that the areas for the managed realignment potential measures are mapped to where managed realignment has been identified by the Environment Agency in the Shoreline Management Plan, which considers loss of

habitat. No additional sites, with such risks, have been included. However, given there were a number of concerns raised over the areas proposed for the managed realignment potential measures, this footnote will be brought into main text so this is completely clear to the reader.

The proposed additional potential measures for **saltmarsh** and queries over the appropriateness/feasibility of measures for **seagrass** and **native oysters** will be reviewed by the coastal advisory group before finalisation of the Strategy.

In order to include a priority for **blue mussels**, priority CL5, previously focussing on just native oysters, will be amended to “Sustainable management of native reef building shellfish to allow them to reach their habitat providing potential”, with potential measures included for both native oysters and blue mussels. This proposed amendment and associated measures will be reviewed by the coastal advisory group before finalisation of the Strategy.

The need to involve all stakeholders in any measures affecting the fishing industry will be noted where relevant.

6.10 Other notes

Technical amendments and additional detail for the introductory sections for all ambitions, priorities and measures will be addressed within the revised Strategy, as per the comments.

Additional feedback about the priorities and potential measures questioned why there were no priorities relating to health, wellbeing and access to nature, nor education and awareness raising. It was also queried why potential measures didn’t include enforcement and protection actions. The reason for the exclusion of such priorities and measures is because these fall outside the scope of the LNRS, which should only focus on habitat and species priorities and measures. Where appropriate and relevant supporting measures for these have been included. But largely these matters will be addressed as part of the wider delivery work by partners post publication. The LNRS is also not able to offer any formal or enforceable protection – this sits within existing regulatory, legislative and local planning mechanisms.

Respondents also identified that the high number of potential measures led to complex mapping, which in places overlapped with more than one measure identified for that area. It was noted that there was no guidance on how to prioritise overlapping or conflicting measures for the same area. It was requested that clarity be provided in the in the form of a suitable hierarchy to avoid future planning and ecological misinterpretation and potential conflict. This was a recognised omission from the draft LNRS maps and discussed in section 4.3 *How to use the potential measures and mapping to*

inform nature recovery. Under *Prioritising action* it was stated:

"In some locations, more than one potential measure is identified. This is to ensure that no opportunity for nature recovery is missed and that broad areas consider a range of habitats, to create the mosaic of habitats that nature recovery needs. Where the most appropriate measure, based on the site, is not clear following local site assessment, the hierarchy of principles should be applied. That being and starting with:

1. Better – first ensure that appropriate management is in place and resourced.
2. Bigger – build on what is there by extending and buffering, using natural regeneration as the first approach.
3. More – where there is not the opportunity to extend, establish new through restoration and creation.
4. Joined up – this principle will be achieved by delivering on the first three principles and focussing this action in the "areas that could become of particular importance for biodiversity".

Consideration should also be given to prioritising measures which offer the opportunity to deliver against the Strategy's identified priority species."

During the finalisation of the Strategy, the provision of more robust guidance on the priority measure for a location will be developed and included.

7. What the consultation told us about the Local Nature Recovery Strategy's mapping

The consultation responses suggests there is a reasonable understanding of the maps and how they were created; and reasonably strong confidence in accuracy of the mapping. There is reasonably strong agreement that the maps target action to the right places in the county and that the ACIB focuses action to where it should be prioritised. There were some specific comments on the maps that need to be reviewed.

7.1 Purpose and development

61% of respondents agreed that the purposes of the Strategy maps, and how they were devised, is clear; 23% partially agreed and 7% disagreed (10% unsure).

There were a few concerns raised in respect of the mapping being out date as soon as it is published. There were also comments made in respect of the online tool used to present the maps during the consultation – these are picked up under section 5.5.

None of the comments made suggested how the purpose and development could be made any clearer. In the absence of these, no amendments will be made to the Strategy in this regard. This risk of mapping becoming outdated is a recognised one but not one easily addressed. The Strategy will be reviewed and updated no more often than every three years and no less than 10 years – updates will be taken at the same time nationwide, when instructed by the Secretary of State.

7.2 Mapping process

59% of respondents agreed that the information provided in the LNRS and the online maps make it clear which potential measures have been mapped and how they were mapped; 21% partially agreed and 10% disagreed (10% unsure). 61% of respondents agreed that the information provided in the LNRS and the online maps make it clear which potential measures were used to inform the Areas that Could become of Importance for Biodiversity and how the map was created; 14% partially agreed and 12% disagreed (13% unsure).

Comments on the mapping largely related to the data used – either that it was not clear what data informed mapping; concerns that incorrect or not the most up to date data had been used in the mapping; and also that other data sets had not been consulted. There were also comments made in respect of the online tool used to present the maps during the consultation – these are picked up under section 5.5.

The data used to inform the mapping was advised on and ratified by the Data, evidence and mapping Technical Advisory Group, comprising experts from the county. National

data sets were only used when the project didn't have access to locally held and better data. Full details of what data was used to create each map was provided with the LNRS in an appendix. As the Strategy is revised and redesigned, clearer ways to present the mapping approach and the measures that inform the Areas that Could become of particular Importance to Biodiversity (ACIB) will be considered.

The issue with datasets becoming out of date, and hence the maps, is recognised but the LNRS can only work to what's available at time. This will be covered by the inclusion of a general caveat about mapping and it being based on best available at time.

Suggestions that the KLIS habitat potential maps should have been used are noted. However these are historic maps and the project was not able to find the background to these maps creation nor the metadata; in the absence of this, these maps were not considered a valid data source. Similarly, it was questioned that the Biodiversity Opportunity Areas (BOAs) were not used to inform the mapping. The BOAs were based on the targets of the 2015 Kent Biodiversity Strategy, which was subsequently updated in 2020. As such they are representative of superseded biodiversity targets for the county - effectively the LNRS mapping is an update of the BOAs, mapping the new priorities for Kent and Medway.

During the LNRS mapping review and update, following the consultation, the project will ensure the most up to date data sets (and any new) are used where appropriate.

The risk to accuracy and up to date picture of habitat status, extent and conditions posed by a largely a desktop mapping approach was raised, and it was questioned whether there would be any ground truthing or the opportunity to add/remove in future as a live document. Once published, the maps will not be revised until the full LNRS review and update – this will be no more often than every three years and no less than 10 years, and updates will be taken at the same time nationwide, when instructed by the Secretary of State. Ground truthing at the county-scale is beyond the capacity of the project. To an extent, some ground truthing has occurred during the review of the initial draft maps with partners and stakeholders, who represented extensive and up to date knowledge of their local areas of interest. The mapping was also reviewed by all the local planning authorities. This scrutiny has been further built on during the public consultation.

Some comments queried how the mapping dealt with site condition or the dynamic and changing habitats of successional and coastal habitats. It would not be possible, nor practical, to keep an accurate map, even if live. This is why it is made clear in the Strategy that these are indicative measures and actual ground conditions must be assessed before moving forward with action. This is especially important where more than one measure has been identified for the same area, as the most appropriate and/or priority measure may very well depend on the site condition and other local factors at the time. This is one of the reasons why the project chose to map multiple measures where they arose, so no

opportunity would be missed should conditions not favour a measure at the time of implementation.

Queries were raised regarding what is meant by urban and how this has been defined in the mapping. It was noted that there appeared to be a lack of consistency as to what settlements are included or not in the base data layer. It is correct that there are different data sets used to define urban across the Strategy. The revisions will either re-map these areas consistently or explain why different urban data sets have been used. And for each dataset, will add in what is defined as urban for each. A similar query was raised regarding green space, green infrastructure etc typologies and the use of datasets that align with those used by the county's local plans. This will also be addressed in the mapping revisions, and typologies included will be made clear.

7.3 Accuracy of mapping of potential measures

66% of respondents agreed that the potential measures mapping identifies where to focus action for nature recovery; 15% neither agreed nor disagreed and 9% disagreed. 60% of respondents were confident that the mapping of potential measures and Areas that could become of particular Importance for Biodiversity was correct; 18% indicated neither confident nor unconfident and 13% not confident.

Comments suggested errors in the data had resulted in incorrect mapping - these will be reviewed and addressed accordingly, including the application of the most recent Local Wildlife Site citations within the Areas of Particular Importance for Biodiversity (ACIB) map. Comments were also received on areas that should be a priority for a potential measure that weren't currently included. This included a comment questioning the provision for joined-up working to protect vital brownfield sites, whilst another queried why opportunities for chalk grassland measures hadn't been mapped to Thanet.

Brownfield, and vital sites, has been addressed by measures and mapping in chapter 10 on successional habitats. The difficulty with mapping brownfield (referred to as open mosaic habitats found on previously developed land) is the lack of data as to where rich and important sites are – this has largely been led by anecdotal evidence in the Strategy. Consequently, the LNRS includes a data and evidence need under priority SH1, to "survey the county's open mosaic habitats found on previously developed land/brownfield sites to identify the county's best and most significant sites".

The chalk grassland measures within the Strategy focus on extending not creating – therefore priority areas for these can only be based from existing chalk grassland, hence the limitations in Thanet. Chalk grassland within Thanet will be reviewed again to ensure no opportunities are missing.

Where proposed additions and amendments are backed with evidence and/or justification as to how that site supported a potential measure and/or should qualify for inclusion in the Areas of Particular Importance for Biodiversity (ACIB) map or a mapping mistake was noted, amendments, as appropriate, will be made.

In terms of confidence, one query raised related to certainty over the suitability of measures at the very local level, with another noting that as the mapping was desk-based and is indicative, they could only be “fairly confident” in the results. There was also confusion when more than one measure was mapped in the same area, regarding which measure took priority. This was a recognised omission from the draft LNRS maps and discussed in section 4.3 *How to use the potential measures and mapping to inform nature recovery*. Under *Prioritising action* it was stated:

“In some locations, more than one potential measure is identified. This is to ensure that no opportunity for nature recovery is missed and that broad areas consider a range of habitats, to create the mosaic of habitats that nature recovery needs. Where the most appropriate measure, based on the site, is not clear following local site assessment, the hierarchy of principles should be applied. That being and starting with:

1. Better – first ensure that appropriate management is in place and resourced.
2. Bigger – build on what is there by extending and buffering, using natural regeneration as the first approach.
3. More – where there is not the opportunity to extend, establish new through restoration and creation.
4. Joined up – this principle will be achieved by delivering on the first three principles and focussing this action in the “areas that could become of particular importance for biodiversity”.

Consideration should also be given to prioritising measures which offer the opportunity to deliver against the Strategy’s identified priority species.”

During the finalisation of the Strategy, the provision of more robust guidance on the priority measure for a location will be developed and included.

As discussed in the previous section, ground truthing of the desk-based mapping was not possible and instead the project has relied on the expert and local knowledge of partners and stakeholders to sense check the maps. In response to comments from the consultation, the Data, evidence and mapping Technical Advisory Group discussed on 27th June 2025 the appropriateness of any exclusions or masks that could be applied to remove mapped measures from areas considered not conducive to the potential measure – whether than be based on geology, land use or other definition of suitability; or determined by habitat types/features not wanted in a certain area. The Advisory Group determined that no further refinement on the basis of excluding certain land types, land

uses and habitats from some measures was required, noting that some specific exclusions had already been applied on the advice and input of partners. It was also considered that a blanket exclusion could result in missed opportunities. It was the Group's opinion that a robust and clear caveat for the mapping would be sufficient.

Along a similar theme, a query was also raised about the potential for measures mapped in the same area to conflict with each other, and further, how the balance of habitats might change as a result. At the same meeting, the Data, evidence and mapping Technical Advisory Group determined that nothing further was needed in respect of mapping of measures and potentially conflicting measures in the same area, concluding this would be sufficiently dealt with by guidance on prioritising of measures where there was more than one in the same location, and with caveats for measures as appropriate.

7.3.1 Amendments to potential measures mapping

As a result of the consultation, queries were raised on the mapping outputs for the following measures. The following will be reviewed and acted on as appropriate by the mapping team.

Ref	Potential measure	Proposed edit
LM1.2	Identify key pieces of farmland that are strategically important for linking natural habitats.	Remove mapping of measure at Pegwell hoverport.
LM2.1	Use of nature-based solutions to improve climate resilience of farmland.	Remove mapping of measure at Pegwell hoverport.
LM4.1	Protection of habitats and species sensitive to disturbance by employing site management, and other measures, which support connection to, and experience of, wildlife but ensures our most sensitive sites remain undisturbed.	Application of new open space typologies. Ensure limited to areas of public access.
GL1.3	Increase functional links between chalk grassland and other habitats to maximise nature based solutions offered by improved connectivity.	Ensure urban land cover and adopted local plan allocations have been removed.
GL2.2	Deliver grazing marsh habitat restoration, extension and creation where it will offer the greatest gains to support the county's important grazing marsh flora and fauna, and is designed to minimise recreational disturbance and reduce risk from	Remove mapping at Capel-le-Ferne and St Margaret's-at-Cliffe and check data layers for errors. Correct exclusion of Spitend Marshes. Ensure urban land cover and adopted local plan allocations have been removed.

Ref	Potential measure	Proposed edit
	predation.	
GL2.3	Reconnect rivers with their former natural floodplain and improve the water storage ability of floodplain, in order to protect against climate change impacts and drought.	Query absence of Kent Brook.
GL3.3	Increase connectivity of, and provision for wildlife in, lowland meadows by leaving field margins uncut, varied sward heights, hedgerows well-connected and integrate some bare patches or banks within the grassland site.	Ensure urban land cover and adopted local plan allocations have been removed.
GL5.2	Management of fields, with mixed times of cultivation to encourage a diversity of arable wild plants.	Ensure urban land cover and adopted local plan allocations have been removed.
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.	Remove mapping of measure at Pegwell hoverport.
WTH2.5	Plant more urban trees and create urban forests and orchards, ideally siting tree planting to where they will provide flood management, air quality and temperature regulation benefits.	Mapping appears to miss some of the areas with the lowest tree canopy cover – review methodology for this and consider revision.
WTH4.1	Management that facilitates and enables the natural regeneration of woodlands, by reducing grazing pressures.	Consider removal of urban land cover.
WTH4.3	Increase connectivity of woodland habitats by creating semi-natural habitat buffers strips, that reduce the gaps between patches and extend woodland edge habitats, and providing links through trees outside the woodland.	Query over appropriateness of measure mapped north of Plumstone Road east of Thanet Earth - review.
WTH5.4	Connectivity of ancient woodland improved by links to hedgerows, establishment of standard trees and	Measure mapped to Thanet but no areas of ancient woodland in the district.

Ref	Potential measure	Proposed edit
	increased standing deadwood.	
WTH5.5	Use of ancient woodland inventory to identify isolated blocks of ancient woodland.	Query over inclusion of Ashenbank Wood.
WTH6.2	Creation of ponds within woodlands, and naturally regenerated riparian zones.	Check application of refining data layers in Thanet.
WTH9.2	Establish new community orchards, in appropriate areas and with a focus on urban locations.	Potential extension of measure to urban areas and rural settlements.
FW2.3	Establish and manage functional buffer strips and other interception features for all flow pathways to hold runoff and remove pollutants including chemicals, nutrients and sediments.	Mapping only applied to rivers not all freshwater habitats.
FW2.5	Reduce the risk of combined sewer overflows by reducing surface water entering the drainage system for example through the use of SuDS, natural flood management measures or similar.	Query over omission of River Eden and tributaries.
FW3.2	Use nature-based solutions to improve recharge to chalk aquifers , for example through creation of catchment and interception woodlands on clay caps, cross-slope hedges, chalk grassland, and similar.	Query over mapping approach – same as mapping for FW3.4.
FW5.1	Safeguard headwater streams from agricultural pollution, erosion, and road runoff through the use of semi-natural buffer strips and interception features.	Query over mapping results for this measure - only seems to focus in one area.
FW6.2	Establish good farming practices for chalk streams, including cover crops, minimum till, infield buffer strips and green swales, restoration of hedges across slopes, woodland and pond restoration in fields.	This priority is all about chalk streams but the mapped measures show other watercourses – check data.
FW6.3	Restore natural processes and form, rewetting river corridors to safeguard recharge and mitigate against low	Query over hydrology data applied.

Ref	Potential measure	Proposed edit
	flows and create habitat, including through encouraging braided channels and a saturated floodplain.	
FW8.4	Enhance online lakes to include a mosaic of habitats and watercourses.	Small ponds and ephemeral wetlands may be absent from maps – review.
URB2.1	Areas of urban greenspace managed specifically for nature recovery, increasing ecological value, where benefits are most needed.	Application of new open space typologies.
URB3.1	Trees and hedgerows specifically planted to deliver air quality, temperature regulation/cooling and surface water management benefits and targeted to areas where it is most needed and will deliver the greatest impact.	Can surface water flooding risk mapping or air quality management areas be included? Application of urban areas to refine?
URB3.5	Increased green and blue infrastructure, and more natural space, is targeted to communities where it is most needed to deliver health and wellbeing benefits and greater connection with nature.	Revise mapping so that deprivation layer is only applied to areas lacking greenspace.
CL1.3	Hard defences removed where appropriate, to allow space for tidal ingress and enable the managed realignment of the coastline, to mitigate coastal squeeze and allows intertidal habitats to be more resilient to climate change.	Remove St Marys Marshes.
CL1.4	Create areas for saltmarsh restoration, seagrass regeneration and high tide roosts as well as breeding areas for seabirds and waders.	Review mapping and line through Elmley - is this as a result of the saltmarsh extent and zonation data? Consider use of contour approach for mapping measure?
CL4.1	Management of problematic non-native species.	Limit mapping to chalk reef areas.
CL4.2	Control leisure boat and other recreational activity in chalk reef areas.	Limit mapping to chalk reef areas.
CL6	All saline lagoon measures.	Missing saline lagoon at Spitend, Elmley NNR.

7.3.2 Value of selected potential measures mapping

As a result of the consultation, queries were raised on the value of the mapping outputs for the following measures. The following will be reviewed and acted on as appropriate by the mapping team.

Ref	Potential measure	Review
CON1.2	Identify and safeguard areas that are strategically important in reducing fragmentation and addressing bottlenecks for species movement.	Map appears to have wide/blanket coverage – consider if more sensible to include as supporting measure instead and/or have as further data/evidence need.
CON3.2	Enhance habitats alongside the county's highway, railway, cycleway, pathway and PROW networks and National Trails to become functional networks for wildlife movements and providing opportunities for people to connect with nature.	Wide coverage – can it be refined to where action is most needed or should it just be an unmapped measure?
LM1.1	Identify opportunities for new or extended farmers clusters in areas of strategic significance not already covered.	Suggest this map is retained as useful to show where clusters are missing.
LM1.2	Identify key pieces of farmland that are strategically important for linking natural habitats	Map appears to have wide/blanket coverage – consider if more sensible to include as supporting measure instead and/or have as further data/evidence need.
FW3.1	Protect rivers from disproportionate impacts of abstraction by managing abstraction and water use in catchments which suffer from drought or water scarcity, and improving habitats to provide resilience.	Map prioritises areas for this measure and therefore seems useful to keep this as a mapped rather than supporting measure. Would different wording of measure make a difference to it remaining as measure - for instance "Safeguard rivers and freshwater habitats in county most sensitive to low water levels through measures to reduce abstraction and water use in catchment".
FW6.2	Establish good farming practices for	Map could be useful for farmers and

Ref	Potential measure	Review
	chalk streams, including cover crops, minimum till, infield buffer strips and green swales, restoration of hedges across slopes, woodland and pond restoration in fields.	advisors who may not know land is within vicinity of chalk stream. This seems like a good identification of opportunity and map could be useful for support of grants to put in place necessary farming practices.
CL4.2	Control leisure boat and other recreational activity in chalk reef areas	Map is useful for identifying where this management action is needed.

7.4 Agreement with ACIB

68% of respondents agrees the mapped Areas that Could become of particular Importance for Biodiversity (ACIB) suitably focuses where action should be prioritised; 12% neither agreed nor disagreed and 11% disagreed.

A number of the issues raised with the ACIB mapping, in terms of interrogation and interpretation, will be addressed with the more user-friendly online mapping to be developed (see section 5.5).

Some respondents noted that the ACIB mapping had broad coverage and queried whether this would dilute the effectiveness of the proposals, calling for further focus. Further, when coupled with the Areas of Particular Importance for Biodiversity (APIB) mapping, a respondent suggested that the Strategy designated the majority of Kent and Medway as ACIB or APIB, with blanket designations over entire areas – seemingly contrary to the purpose of LNRS, which is to identify the most important land for biodiversity protection and enhancement. It was suggested that mapping should focus on key parts of a site, such as hedgerows and individual trees.

It is important to note here that the Areas that Could become of particular Importance for Biodiversity (ACIB) and Areas of Particular Importance for Biodiversity (APIB) are not designated areas. The APIB is collectively made up of designated areas but this should not be read as one designation, as each different element has different legislation and policy. The ACIB does have seemingly blanket coverage but the important detail of the ACIB rests in the potential measures that fall within it and therefore there is a prioritisation of sorts based on these – identification of a site falling within an Area that Could become of particular Importance for Biodiversity is only of relevance if the action proposed aligns with the potential measure identified for that site. This is a complex element of the LNRS mapping that will be made easier to navigate with the new online mapping tool (see section 5.5). Going down to parts of a site, as suggested, would be beyond the capacity of the project and its mapping.

In respect of all concerns noted for the broad scale of the Areas that Could become of particular Importance for Biodiversity (ACIB), it should be noted that the LNRS does not instruct nor does it prevent – it is a directive. The Strategy does not:

- Draw localised, detailed or definitive boundaries but will identify areas where action is likely to provide the greatest gains.
- Dictate actions or instruct their implementation but will identify potential measures that could be taken to support the recovery of nature.
- Force landowners and managers to make changes to the way they use and manage the land or their operations. But action will be incentivised by linking delivery of the Strategy priorities to a wide range of government grants and funding.
- Prevent development from happening but will inform future local plans, in terms of land use planning, and inform development management, in relation to biodiversity net gain.
- Offer any formal protection.

The majority of the comments received noted additional areas for the Areas that Could become of particular Importance for Biodiversity (ACIB). Sites cannot be added to the ACIB, as this undermines the process of the LNRS and the foundation of the ACIB – that being that it is created by sites prioritised for the delivery of the Strategy's potential measures. Where areas proposed were not justified with links back to a potential measures, these have not been considered for inclusion. Where the respondent provided a contact name or organisation for the comments, this justification will be sought so the proposal can be considered.

There were a number of queries regarding why areas were excluded. The Areas that Could become of particular Importance for Biodiversity (ACIB) is created by combining the mapped potential measure areas and then refining this area to focus on where delivery of these measures would tackle connectivity issues within the county. So an area may have been mapped for a potential measure initially, but the refinement necessary to ensure the ACIB coverage is appropriate, may have resulted in it not featuring in the final mapping. This is not to say that this area is not still important for the particular habitat priority and/or delivery of associated potential measure – it is just when considered at a county/strategic scale, it does not deliver benefits as widely as another site.

Comments were received in respect of known important sites for nature and that these were missed from the ACIB – without exception, this was because they were sites that fell into one of the following categories and were mapped within the Areas of Particular Importance for Biodiversity (APIB) and were therefore required to be excluded from the ACIB:

- National conservation sites.
- Local conservation sites, including Local Nature Reserves and Local Wildlife Sites.

- Areas of irreplaceable habitat.

It is considered that a number of the queries, comments and criticisms of the mapping resulted from a misunderstanding of the requirements of the mapping and the process used to map the potential measures, Areas of Particular Importance for Biodiversity (APIB) and Areas that Could become of particular Importance for Biodiversity (ACIB). The explanation of this within the Strategy will be reviewed and revised accordingly, and will be accompanied by a pictorial representation of the process – an initial diagram is appended to this report to help the understanding of the mapping.

Some of the comments on the Areas that Could become of particular Importance for Biodiversity (ACIB) related to seeming oddities in the resulting mapping. For instance, random small areas identified as within the ACIB, strange shapes/cut offs on the mapping and odd areas within an ACIB area cut out. At the Data, evidence and mapping Technical Advisory Group meeting on 27th June 2025, to discuss matters arising from the consultation, these potential anomalies were reviewed. It was noted that isolated pockets of the ACIB related to where measures are mapped to ponds, an ancient tree or other small area habitat. The odd shapes were mainly as a result of the informing data layers used and their presentation. And some of the areas cut out resulted from small local wildlife sites or local nature reserves, within a wider site, cut from the ACIB as they were already included in the Areas of Particular Importance for Biodiversity (APIB). The Technical Advisory Group concluded that the small, and sometimes isolated, areas in the ACIB should be retained as they related to critical features in our landscape which need action.

In respect of the mapped Areas that Could become of particular Importance for Biodiversity (ACIB), there were queries why protected sites hadn't been mapped and also why seemingly large areas of land had been left isolated, with Dungeness and Romney Marsh given as an example. Protected sites could not be included in the Areas that Could become of particular Importance for Biodiversity and instead were mapped in the Areas of Particular Importance for Biodiversity (APIB). This is why areas such as Dungeness and Romney Marsh are not included in the Areas that Could become of particular Importance for Biodiversity (ACIB) because so much is already designated and therefore covered by APIB.

However the comment that this area then appears isolated was a valid one, which was considered by the Data, evidence and mapping Technical Advisory Group on 27th June 2025. The Group concluded that the mapping result is a reflection of the nature of Kent's habitats, landscape and species. And given that the area of concern raised (Dungeness and Romney Marsh), will likely be connected and linked with the Sussex LNRS (Kent LNRS will be consulted on their mapping) no action would be taken on this raised concern.

Concerns were raised over the “white space” on the mapping, as respondents considered that these would then be targeted for development. In a similar vein, it was felt that some of the mapping significantly underestimated the potential land area in which it would be possible to deliver actions – with Thanet particularly singled out in this regard.

“Areas that Could become of particular Importance for Biodiversity” (ACIB) do not indicate areas where development should be excluded; they also do not dictate action nor place limitations on how the land should be used. Similarly, “white space” does not indicate areas for development, nor that there is no existing biodiversity value, opportunity or potential present. The ACIB is based on the potential measures mapping – and these do not show all opportunity areas but rather the areas prioritised for action. It is therefore possible that the mapping could be interpreted as underestimating the value or opportunity of an area but this is not the case and it should not be read as so. The LNRS purpose is to not only identify what potential action is needed but also where, focussing action to where it is most needed and where it will deliver the greatest benefits – it is not supposed to be showing all potential areas for action.

7.4.1 Proposal for the area between the rural settlements of Tyler Hill and Blean

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.

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 is not - this is likely because measures not compatible with allocated sites have been excluded from the mapping – and an area of this land is within an allocated site in the Canterbury Local Plan 2040.

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 do 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.

Given the extent of the comments, and support for inclusion of this area within the Areas that Could become of particular Importance for Biodiversity (ACIB), the proposed inclusion was put to the Delivery Group and Board for final decision on 27th June 2025 – with input sought from and provided by Kent Wildlife Trust and Canterbury City Council. 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).

7.5 Online mapping tool

The consultation noted that the online mapping tool was a temporary platform for displaying the Strategy’s maps and acknowledged a more user-friendly tool would be required for the published LNRS. As such, the consultation did not seek any feedback on the tool used for the consultation. Despite this, the need for an improved mapping tool was a common element in the feedback and provided some suggestions on what people

might expect from it in the future. This is summarised below and will be used to inform the brief for the online mapping tool's development.

- Postcode (and other) search tool to locate specific locations.
- Ability to click on location and see measures that apply.
- Where more than one measure applies, when you click on location, it presents them in priority.
- Still retain ability to see mapped measures.
- Be able to view multiple measures at one time and distinguish between them.
- More user friendly interface, where you can see full potential measure not just the reference number.
- Ideally quick for maps to load.
- Ability to remove all data layers rather than needing to click all off or refresh webpage.
- Retain zoom in and out function.
- Retain measure function.
- Retain mapping information link function.
- As well as district/borough boundaries, have parish boundaries as an option.
- Instructions on how to use maps to inform nature recovery available from tool.
- Notes on mapping to be available from tool.
- Have clear instructions on what each element of the mapping represents, including definitions of ACIB, APIB etc.
- Data is easy to view and digest, from both a plan making and a decision taking perspective.
- Can be viewed on tablet as well as desktop.
- Function should look to minimise any user error so that correct information is always displayed, particularly in relation to strategic significance.

The intention is to have a new online viewing tool available from publication.

Development of this tool will involve end users from various sectors, to ensure it meets the needs of all target audiences and where possible, displays useful (optional) information that can be viewed alongside the LNRS maps, to enable better interpretation of the maps and design of action for nature.

8. What the consultation told us about the Local Nature Recovery Strategy's priority species

78% of respondents were confident that the priority species identified are correct; 8% disagreed and 8% neither agreed nor disagreed.

61% agreed that the Strategy's measures will halt the decline, and aid the recovery, of priority species; 12% disagreed and 21% neither agreed nor disagreed.

The majority of comments on the Strategy's priority species related to the loss of species as a result of development but also the positive role development can play in providing space of nature within design. There were also technical corrections – for instance common names to be used – which will be picked up during the revision; and introductory text was provided by Kent Field Club for the grasshoppers, crickets and allied priority species.

It was noted that not all the priority species had bespoke measures – this is because the necessary measures to support the recovery of these species was already addressed under the relevant habitat priorities. The question was then raised whether these species should be identified as a priority species. This was discussed with the Species Recovery Technical Advisory Group on 26th June 2025, held to consider species matters arising from the consultation. It was agreed that the priority species of the LNRS will be presented as follows in the final Strategy document:

- The species chapter will still present each species group, with the introduction as per the consultation draft.
- Following the introduction, priority species whose requirements will be met by the habitat potential measures will simply be listed (a reference table will be appended, so associated habitats of that species can be noted).
- Priority species that require bespoke measures will be listed, with the action required, in the species chapter.
- In the habitat priorities, species provided for by potential measures will be listed.

A standalone and more detailed species toolkit, with links to guidance etc, will be developed following publication to support the LNRS. And in the finalisation of the LNRS document, the responsible authority will ensure that a full explanation of the process of selection and presentation is included, so readers can understand differences of species in species section and those associated with habitats.

Suggested amendments or additions to potential measures identified for the priority species, and likewise habitat assemblages, were reviewed with the Species Recovery Technical Advisory Group and adopted or not as appropriate.

Comments queried the lack of mapping for the priority species. The Species Recovery Technical Advisory Group considered this on 26th June 2025 and agreed the following approach for the mapping of areas in which to focus the delivery of priority species measures. A heat map, per species assemblage will be created, which will be clipped to the particular habitat that assemblage is referring to. Areas of most species density will be drawn from this and given a 1km buffer (to reflect modelling and dispersal distances), to create target areas for that species assemblage.

It is noted that this mapping will focus on existing habitat. In order to identify new areas for species this map can be used alongside the other potential measures mapping. The process will be to overlay the priority species map for, say, grassland assemblage with the extend/create potential measures maps for grassland, in order to identify which of the areas identified for the measure would be most beneficial in joining up areas of significance for priority species (i.e. potential measure mapped to gap between two areas of importance for the priority species); or extending existing areas of significance for priority species (i.e. potential measure mapped to, and beyond, existing area of importance for the priority species). Such maps will be created by users themselves, with the use of the online mapping tool and layers function. The selection of different measures overlaid with a priority species map will allow users to identify and focus on priority species for both existing areas (management – “better”) and new (“bigger” and “more”).

The maps will be created from KMBRC data records and be supplemented with SRTAG knowledge of on the ground sites of note, if missed by desktop mapping approach. These maps can be backed up by individual species records as required, via KMBRC

Unsurprisingly, the area of the species work which received the largest number of comments was the list of priority species itself. Overleaf lists species suggested as missing from the list and notes the conclusion of the review undertaken of these by the Species Recovery Technical Advisory Group on 26th June 2025.

Proposed addition	Outcomes of review
House sparrow	House sparrow does not meet the Natural England criteria for inclusion on LNRS species longlist ¹ , from which priority species are derived. Whilst this species will not be added as a priority species, a measure will be added for House sparrows (and Starlings) alongside the

¹ Natural England criteria for inclusion on LNRS species longlist: Native species that is –

- Red List Threatened or Near Threatened.
- Not assessed but there is strong evidence they meet the criteria for Threatened status.
- Considered to be nationally extinct that has re-established or been rediscovered.
- Identified by NE as a suitable candidates for conservation translocation.
- Of local significance with strong evidence they meet the criteria for Threatened status.

Proposed addition	Outcomes of review
	other urban birds under the urban ambition. Reference will also be made to reducing/removing pesticides in gardens for the benefits of House Sparrows.
House Martin	Not excluded – identified as a priority species.
Skylark	<p>Skylark was identified as a species on the LNRS longlist and one that would benefit from the LNRS but, as it did not require specific or targeted recovery measures beyond that provided by the wider LNRS actions of better, bigger, more and connected habitats, was not suitable as a priority species.</p> <p>Whilst this species will not be added as a priority species, unmapped measure will be added will be for Skylarks under the land management ambition.</p>
Swallow	<p>Swallow was identified as a species on the LNRS longlist and one that needs improvements in environmental quality but judged lower priority than other bird species; excluded to reduce length of list as requested by LNRS guidance.</p> <p>Whilst this species will not be added as a priority species, unmapped measure relating to provision of nesting sites for Swallows in farm buildings will be added under the land management ambition.</p>
Wading birds	Not excluded – identified as a priority species.
River species	Not excluded – priority species includes the White-clawed Crayfish, the Common Eel (European Eel), Grey Wagtail, Kingfisher, caddisfly, European Water Vole, Frogbit and Opposite-leaved Pondweed. No other river species met the Natural England ¹ criteria for inclusion on LNRS species longlist.
Barbastelle bat	<p>Barbastelle bat is not a species currently present in Kent, although noted that there is good potential for them to come especially with NNR work. Natural England have confirmed that a species not currently in the strategy areas can be a priority, if the return of that species to the county is an aspiration. Kent Bat Group confirmed that whilst it would be nice to see its return, there are likely others to prioritise for such a focus over the Barbastelle.</p> <p>Whilst this species will not be added as a priority species, provision for this, and other species extinct from county, will be made under the species ambition (see note below this table).</p>
Beaver	Not excluded – identified as a priority species.
Weasel	<p>Weasel does not meet Natural England criteria for inclusion on LNRS species longlist –best available data suggests this is a species of least concern.</p> <p>Whilst this species will not be added as a priority species, it is noted that it will benefit from the wider action of the LNRS.</p>

Proposed addition	Outcomes of review
Slow worms	Slow worm was identified as a species on the LNRS longlist and one that would benefit from the LNRS but, as it did not require specific or targeted recovery measures beyond that provided by the wider LNRS actions of better, bigger, more and connected habitats, was not suitable as a priority species. Will not be added as a priority species.
Juniper	Juniper was identified as a species on the LNRS longlist and one that would benefit from the LNRS but, in absence of specific or targeted recovery measures, was not suitable as a priority species. On review, and with the use of Plantlife's management handbook ² for potential measures, Juniper will be added as a priority species.
Native oysters	Native oyster is identified as a species on the LNRS longlist. However it is not included as a priority species as it is already covered by priority CL5 <i>Sustainable management of native oyster beds to allow them to reach their habitat building potential. under coastal ambitions</i> , recognising its role as a habitat building species.
Allis Shad	Will be assessed against the Natural England criteria for inclusion on LNRS species longlist, before being considered for inclusion as a priority species.
Atlantic Salmon	Will be assessed against the Natural England criteria for inclusion on LNRS species longlist, before being considered for inclusion as a priority species.
Common Sturgeon	Will be assessed against the Natural England criteria for inclusion on LNRS species longlist, before being considered for inclusion as a priority species.
River Lamprey	Species of least concern but meet the local significance criteria for inclusion. On advice of ZSL, River Lamprey will be included as priority species.
Sea Lamprey	Species of least concern but meet the local significance criteria for inclusion. On advice of ZSL, Sea Lamprey will be included as priority species.
Smelt	Smelt are species of least concern but meet the local significance criteria for inclusion. On advice of ZSL, they Smelt will be included as priority species.
Zostera noltei	Not included as priority species – already covered by priority CL3 <i>Reverse the decline in seagrass off Kent's coast to safeguard this important habitat for marine species and their breeding grounds and nurseries; and to preserve its vital function as a blue carbon store.</i>
Zostera marina	Not included as priority species – already covered by priority CL3 <i>Reverse the decline in seagrass off Kent's coast to safeguard this</i>

² <https://www.plantlife.org.uk/wp-content/uploads/2023/03/ManagingJuniper.pdf>

Proposed addition	Outcomes of review
	<i>important habitat for marine species and their breeding grounds and nurseries; and to preserve its vital function as a blue carbon store.</i>
Saltmarsh species	Too broad for inclusion. Eligible species related to saltmarsh habitats have already been included.
SPA specific species which are not included.	Too broad for inclusion. Eligible SPA species have already been included.

In consideration of how to address species currently absent from the county, the Species Recovery Technical Advisory Group agreed on 26th June 2025 that, at this stage, priority species would not include those not currently found in the county but whose return would be an ambition. However, to address this, the requirement to consider long list of species will be amended to include the need to also consider currently absent species, with a list provided in the species recovery toolkit for guidance.

9. What the consultation told us about the Local Nature Recovery Strategy's delivery

9.1 Confidence in the LNRS delivering nature recovery

There is seemingly low confidence in the LNRS delivering nature recovery, with only 40% of respondents confident that the LNRS will deliver nature recovery in Kent and Medway. 26% were not confident and 33% were neither confident nor unconfident. However on analysis of the comments, this lack of confidence is mainly a result of external factors outside the scope of the Kent & Medway LNRS, rather than any failings with the Strategy itself. Barriers to the delivery of nature recovery were seen to be housing development, conflicting policy and lack of government support, the lack of "teeth" for the LNRS and lack of, or insufficient, funding/investment for the actions.

In particular reference to the lack of "teeth", respondents noted that the "optional" nature of the Strategy and words such as "encouraging" and "take account" in respect of the LNRS role in informing action and steering planning were not sufficient to secure delivery, and should instead be replaced with stronger requirements such as "mandated" and "made policy".

The consultation timeframe coincided with the government's discussions of planning reform, the growth agenda and, in particular, their *Planning Reform Working Paper: Development and Nature Recovery*. In addition there were a number of infrastructure announcements and public/press statements made by Government. There is a chance that this influenced some of the responses and may account for the high number of comments received in relation to government support for nature recovery, conflicting government policy and lack of funding. As such, views on the confidence of the Strategy to deliver what is needed for nature's recovery could possibly have been skewed or influenced because of this.

Others noted the absence of measurable targets and/or baseline data on which delivery (and success off) could be evaluated – LNRS guidance dictates the exclusion of such targets.

Agreement was also notably less in respect of whether the LNRS struck the right balance – 48% of respondents agreed there was a balance between ambition and deliverability; 19% disagreed and 29% neither agreed nor disagreed. How this can be addressed is not clear from the associated comments, as the majority focused on the risk to delivery rather than how well ambition was balanced against deliverability.

9.2 Clarity of how the LNRS will inform and limitations

An encouraging number – 68% – agreed the Strategy made clear how it will inform nature recovery (and its limitations of influence). 22% partially agreed, 5% disagreed and 5% were unsure. Amongst those who have participated in the work to produce the LNRS, agreement increased to 81%.

However, there were mixed views on whether the Strategy provides enough detail to inform action for nature recovery – 51% agreed; 24% partially, 8% disagreed and 17% didn't know. It was a similar case for understanding of how the mapping would be used to inform action for nature recovery – 46% agreed; 31% partially, 12% disagreed and 11% didn't know. A user guide to the online mapping was provided but this only got 30 downloads during the consultation period.

The guidance within the document on how it will inform nature recovery and how to use the Strategy and mapping will be reviewed to ensure it is very clear. It may be that these elements of the document were simply lost amongst the pages and would benefit from being in stand alone documents as well. The intention is to develop sector focused “how to use the LNRS guides” at publication stage, so this will likely also work to address this. Where possible more visual explanations, such as flow charts, will be used. The absence of available information on specifically how actions will be funded and more detailed guidance on the LNRS role in planning also contribute to some of the lack of understanding, as the drivers for delivery and funding mechanisms aren't entirely clear yet.

9.3 Role of the LNRS in planning

Another common theme for comments on delivery, was in relation to the role of the LNRS within planning. Much of this sits outside of the Responsible Authority's ability to address, as the role and “powers” given to the Strategy within planning are defined nationally by government policy and legislation. Despite this, it is important to record and note these issues and for KCC to be mindful of them as the authority works with the county's planning authorities on delivery.

It was noted that the Area that Could Become of Particular Importance for Biodiversity (ACIB) could cause potential issues for allocated sites that fall within these areas. It was also suggested that the achievement of housing targets may be hindered if the ACIB reduced the yield of existing allocated sites or limits future, new allocated sites.

It is important to note that inclusion in an Area that Could Become of Particular Importance for Biodiversity does not exclude land from development. It does not prevent development from happening nor will it amend existing or emerging local plans and their allocated sites but will inform future local plans.

The inclusion/exclusion of allocated sites, and other land coming forward for development, in the LNRS mapping was discussed by the Data, evidence and mapping Technical Advisory Group with the recommendation that such sites should not be excluded. This recommendation was endorsed by Kent Chief Planners. Such sites are not excluded because:

- The LNRS does not instruct what should happen on land, rather it informs. Therefore, overlap with a mapped potential measure or the ACIB does not prevent development from occurring on that land. It does however offer direction on what measures for nature could be integrated into that development site to aid nature recovery, should this be something the LPA wished to pursue or already has policy for. Therefore the mapping could be useful in pre-application conversations, site design and as an aid for planning application reviews.
- If removed, it would undermine the integrity of the LNRS and its role in biodiversity net gain – that being to identify strategically important areas for nature and inform strategic significance within the metric. The potential measures will also indicate what actions/gains would be most beneficial and so removal would result in missing the opportunity to steer onsite BNG gains. This is beneficial to the developer too, it terms of knowing that is the most beneficial/valuable action in terms of their net gain delivery.
- Removal would also give the message that nature has no place within development or growth, suggesting that the two are incompatible. Development has a huge and positive role to play in tackling nature decline and removal of sites from the LNRS mapping would undermine this.
- Potential measures mapping will also be identifying opportunities for nature based solutions. Not only might this assist developers in finding solutions to challenges on site, but there may also be the potential opportunity to secure investment to the site if the measures are offering a wider service that otherwise would have to be paid for elsewhere.

The inclusion/exclusion of approved sites, and sites in construction, in the mapping was also considered by the Data, evidence and mapping Technical Advisory Group with the recommendation that such sites should not be excluded. This recommendation was again endorsed by Kent Chief Planners. Such sites are not excluded because the LNRS maps will be in place for up to a possible 10 years, therefore we need to ensure that areas of strategic significance are still considered even if for now, they are being used in a way that might preclude the delivery of the potential measure.

It was agreed that where planning authorities provide a GIS layers of approved and under construction sites, these will be clipped out of potential measures mapping with the exception of those measures that fall under priorities relating to urban, successional, connectivity, freshwater and coastal. It is considered that some of the measures under these priorities may still be deliverable on previously developed land in the future. It was

also recommended by the TAG and endorsed by Kent Chief Planners that the mapping would not exclude:

- Land where work is underway/planned to convert land to a habitat that's an LNRS priority or deliver an identified potential measure. In order to ensure these areas can benefit from grants, funding, investment and BNG uplifts.
- Lower Thames Crossing development area, given there is still no decision on whether this will be going ahead or not.
- Any council owned land that they may be considering for release.

Questions were also raised in the consultation about specifically how the LNRS will influence future/new Local Plan's site allocations and policies, noting it was not clear how sites promoted for development should be viewed where they fall within an Area that Could Become of Particular Importance for Biodiversity (ACIB). And further how the mapping and policies should be integrated. The only advice available is that provided by the [revised \(February 2025\) planning practice guidance on natural environment](#) sets out the role of LNRS in plan making.

How should local planning authorities have regard to Local Nature Recovery Strategies in plan making?

Local Nature Recovery Strategies are intended to support local planning authorities in preparing local plans that conserve and enhance biodiversity and the natural environment, and local planning authorities have a legal duty to have regard to the relevant Strategy for their area. Local planning authorities should consider the priorities set out in the relevant Local Nature Recovery Strategy when determining how their local plan should contribute to and enhance the local and natural environment.

[Paragraph 192\(a\) of the National Planning Policy Framework](#) states that plans should identify, map and safeguard areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. Local Nature Recovery Strategies are prepared through local partnerships (involving all local planning authorities) established under a national legislative framework and will identify and map proposed areas for habitat management, enhancement, restoration and creation for biodiversity and the wider natural environment.

Local planning authorities should be aware of those areas mapped and identified in the relevant Local Nature Recovery Strategy and the measures proposed in them and consider how these should be reflected in their local plan. In doing so, they should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater importance. This will enable local planning authorities to support the best opportunities to create or improve habitat to conserve and enhance biodiversity, including where this may enable development in other location.

Relevant Local Nature Recovery Strategies can also inform the preparation of Neighbourhood Plans and Spatial Development Strategies.

Likewise, questions on what role and influence the LNRS has in planning decisions was also raised. Again, the only advice available is that provided by the [revised \(February 2025\) planning practice guidance on natural environment](#).

How should local planning authorities have regard to Local Nature Recovery Strategies in planning decision making?

The Local Nature Recovery Strategy is an evidence base which contains information that may be a 'material consideration' in the planning system, especially where development plan documents for an area pre-date Local Nature Recovery Strategy publication. It is for the decision-maker to determine what is a relevant material consideration based on the individual circumstances of the case.

In cases where there is a draft Local Nature Recovery Strategy that has been consulted upon but not yet finalised and published, the draft Strategy may contain useful evidential information that can support appropriate decision making.

Paragraph: 047 Reference ID: 8-047-20250219; Revision date: 19 02 2025

Concerns were noted that inclusion of sites in the Area that Could Become of Particular Importance for Biodiversity (ACIB) would require a greater level of biodiversity net gain, which could result in a reduced on-site developable area or an increased need for off-site mitigation. Reducing the number of units of the development could have potential consequences on its viability or affect the deliverability of other community infrastructure improvements and contributions.

The purpose of the ACIB in informing biodiversity net gain, is to ensure that biodiversity net gain calculations take into account the loss of sites which may have been of significance to nature recovery, to ensure the gain really is a gain. The issue of the ACIB weighting on already allocated sites, and potential viability issues which may arise, is not something the Responsible Authority can respond on as it is a national matter for Defra to address – a query has been raised.

The [revised \(February 2025\) planning practice guidance on natural environment](#) sets out the role of LNRS in biodiversity net gain but does not yet address this question.

What is the relationship between Local Nature Recovery Strategies (LNRSs) and Biodiversity Net Gain (BNG)?

Local Nature Recovery Strategies will identify areas where habitat creation, restoration or enhancement would be most beneficial for nature recovery and wider environmental outcomes. They can play a critical role in supporting offsite gains to be delivered in a way that maximises biodiversity benefits, when these are required to achieve a development's biodiversity gain objective. This can help to support bigger and more joined-up areas in which our wildlife can thrive.

Local Nature Recovery Strategies are designed to promote the delivery of offsite biodiversity gain in the right places, where offsite provision is needed to meet the biodiversity gain condition for a development and it cannot be met in full through onsite habitat enhancements. Local planning authorities have an important role in preparing the Local Nature Recovery Strategy for their area to help identify suitable offsite biodiversity gain sites.

The Local Nature Recovery Strategy can be used as a key source of information e.g. regarding strategic approaches to off-site biodiversity net gain delivery and connections to existing habitat, when local planning authorities are carrying out their functions in respect of Biodiversity Net Gain. As part of this the biodiversity hierarchy will need to be considered; the [Biodiversity Net Gain planning practice guidance](#) sets out further information on this.

Paragraph: 048 Reference ID: 8-048-20250219; Revision date: 19 02 2025

Concerns were also noted about the resources needed by local authorities to implement the LNRS within their planning. However, the importance of planning in helping to deliver the LNRS was noted too.

The Responsible Authority intends to work with, and provide as much support to, the county's planning authorities as is within its capacity. And look to provide as much clarity as it can, working with the advice from central government.

9.4 Role of the LNRS in respect of farming and land use

Queries were raised about the potential impact of some measures on food security noting, for instance, that actions such as establishing wider buffer strips are likely to reduce the productivity of the land and food security as a consequence. It was suggested that where land is conducive to food production, this should be prioritised and any land used for these purposes that is taken out of production needs to be adequately compensated for.

For a number of measures, high grade agricultural land was excluded from the mapping in recognition of the need to preserve such land for the production of food. Where measures are still mapped to high grade, and other, agricultural land the Strategy does not force nor compel farmers, landowners and managers to make changes to the way they use and manage the land or their operations – this will remain their choice and the December 2024 policy update from Defra reinforced this position.

It is also recognised that any delivery of nature recovery actions by farmers and landowners should be suitably financed. The financial incentives sit outside of the Responsible Authority's remit and is provided by Defra through its Environmental Land Management schemes. Defra's advice on this to date is provided in the box below.

Local Nature Recovery Strategies (LNRS) delivery – policy update December 2024

LNRSs will be used to:

- Provide information to farmers and land managers to help them choose which Countryside Stewardship and Sustainable Farming Incentive options are appropriate for their land.
- Help groups of farmers and land managers shape nature recovery priorities for their area, and to encourage collaboration across holdings and landscapes.
- Identify opportunities for Landscape Recovery project proposals, and to provide evidence to support their application and project development.
- Help Government when considering applications for funding for specific nature recovery activities, by acting as criteria in applications.

Government is keen to add to the list above to provide further encouragement and support for the delivery of actions proposed in LNRSs. Below are some further opportunities for how LNRSs could be used in future, but which require further exploration to determine whether this will be the case:

- to identify where funding could be made available to encourage farmers and land managers to carry out the most environmentally impactful actions on their land
- as required criteria in future government nature recovery funding schemes, meaning that actions proposed in the LNRS would be eligible for funding.
- to inform the identification of areas that could potentially contribute towards Government's 30by30 commitment following appropriate action for nature recovery.
- to inform where private companies choose to provide corporate donations for habitat creation or enhancement projects that deliver LNRS proposals.
- to guide private finance investments in nature and carbon markets – for example, targeting action on tree-planting as part of the UK Emissions Trading Scheme.

9.5 Beyond publication - delivery

Many of the comments on confidence in the Strategy to deliver nature referred to what is required once the Strategy is published – the support needed for delivery.

One comment summed up what is required for nature recovery rather succinctly – *"There are so many other factors to take into account rather than just the Strategy - finance, communications, leadership will all play a role in whether nature is recovered in Kent and Medway. The Strategy is just a small but important part"*. Other comments noted similar thoughts, and also set out in detail what they considered was required to support the Strategy's success.

At the time of writing, Defra is still to set out what specifically will be the role of the Responsible Authority (KCC) beyond publication. It is understood however that there will be a grant to support the Responsible Authority in facilitating delivery. Therefore

comments received during the consultation are important to record, take note of and build into this developing and emerging role for the county council. Of course, how far the authority can deliver on these will be dependent on the resources made available by Defra.

Facilitation role:

- Practical framework for action.
- Ongoing information sharing.
- Technical support.
- Information on how partners/sectors can get involved.
- Guidance on required actions.
- Support and facilitate local group activities for nature recovery.
- Wider engagement.
- Information on how the public can support.

Delivery planning:

- Defined actions, with a more detailed and clearer plan for delivery.
- Timescales.
- Establish who is responsible for delivering measures.
- Identify lead delivery partners.
- Communication Strategy.

Funding:

- Signposting to funding, investment and capital grants.
- Support in securing funding.

Targets and monitoring:

- Establishment of measurable outcomes and targets.
- "SMART" deliverables.
- Monitoring plan.
- Establishment of measures of success.

Support for farmers and landowners:

- Guidance on which parts of ELMS might be used for funding nature recovery.
- Guidance on where other forms of finance might come from.
- Signposting to funding, investment and capital grants.
- Case studies of the LNRS being used to direct nature recovery in real life.
- Identifying which measures correspond to which ELMs actions.

Whilst these are within the scope of a Responsible Authority (resources permitting), there still remains concerns from respondents about delivery that are not. One comment called for a framework that both incentivizes voluntary participation and mandates compulsory compliance with the principles and intentions of the LNRS. With funding at the discretion

of government, the ability of the Responsible Authority to incentivise action is, at best, minimal – although there is a role for KCC in promoting the opportunities once confirmed. The Responsible Authority also has no power or authority to formally protect nature, as was called for by many commenting.

10. What the consultation told us about the Local Nature Recovery Strategy's clarity and ease of understanding

54% of respondents agreed that the LNRS is clear and easy to understand. 38% said it was partially easy to understand, 4% not easy to understand and 4% unsure. From this and other comments throughout the consultation there is clearly work to be done to improve the clarity and ease of understanding in respect of the Strategy document – key to this is making the document shorter, easier to digest and navigate, and considering what information is needed by different audiences.

There is some limitation as to how much can be done on the length of the published LNRS, as there are statutory requirements as to what must be included. However feedback provides some useful areas to look at and address before publication. These are outlined below.

Feedback	Initial thoughts on how to address
Technical language, too wordy and too many acronyms and abbreviations	<ul style="list-style-type: none"> - Nature of the Strategy means there will be technical language used – audience specific summaries will address this to some extent. - Apply a plain English edit. - Use a professional editor before publication. - Avoid use of acronyms and abbreviations.
Lots of information to digest, the Strategy itself is lost amongst the detailed background, document is repetitive and too long. The full version is very long and the summary is too short.	<ul style="list-style-type: none"> - There is little in the consultation document that isn't a requirement of the regulations and hence will have to be published, so the scope for reducing the length is limited. But alongside the full document, will look at providing more succinct documents, that focus on the actual strategic elements of the LNRS and other areas which can be published as a stand-alone. - There are elements of repetition, which potentially can be reduced. However this repetition is, in places, relating to important points that could be missed if only in one place within the document. - Will develop stakeholder specific documents, which provides the information specifically relevant to that audience, e.g. planners, farmers, landowners, community groups etc. - Will develop a public facing document, which outlines the Strategy in a more concise manner and in layman's terms. - Will develop a longer executive summary which provides more detail – this will be the foundation of the stakeholder specific documents.

Feedback	Initial thoughts on how to address
Navigating the Strategy is challenging.	Whilst there is a requirement to publish a document for the LNRS, will also look to make use of the website and use that to break the Strategy into easier to digest sections, in an easier to navigate format.
Understanding different elements – e.g. what is the intended distinction between numbered measures and unnumbered ones?	This is explained in chapter 4. <i>Understanding the priorities and potential measures</i> but is easily missed if the document is not read in order. Will review how to make this easier to understand.
Maps in the document are difficult to view in detail.	With the maps online and the ability to scrutinise to a detailed level, it is questionable whether the maps within document, displayed at county scale, are of any actual value. Whether to include or not will be considered.
Inaccessible to a wider audience	<ul style="list-style-type: none"> - Will review how the use of summary and web-based materials can make the LNRS more accessible. - Will consider the development of a video explaining the full Strategy.
Is it clear what the LNRS is trying to achieve?	Suggestion to create a short and meaningful strapline that sums up the Strategy and its intended purpose will be considered.

11. Kent County Council's role as Responsible Authority

Some feedback was received during the consultation in relation to Kent County Council's role as Responsible Authority. Some concerns were raised about the authority spending council funding on the development of the Strategy. It was also questioned whether Kent County Council was the appropriate body to be developing the Strategy, given their support of growth and other elements of infrastructure in the county that was deemed by some respondents as counter to nature recovery.

The Local Nature Recovery Strategy has been entirely funded by a Defra grant – all costs associated have been covered by the grant from central government. The Strategy is not a Kent County Council Strategy – the authority, along with 48 other upper tier county and unitary authorities, were appointed by Defra as the authority responsible for preparing it in consultation with partners and stakeholders.

12. Consultation feedback that cannot be addressed by Kent County Council

A significant number of the comments received were relating to national matters that are outside the County Council's ability or position to address. However it is important for these to be recorded and noted. As Natural England and Defra will be receiving a copy of this report, they will be brought to the attention of the relevant bodies.

Clarification sought on:

- How this aligns with government proposals for the management of the farming sector and a commitment to working with farmers and other stakeholders to protect natural habitats.
- The potential financial incentives and funding mechanisms that will support landowners and developers in delivering the LNRS.
- How LNRS will interlink with existing government initiatives.

Concerns over a lack of:

- Political will and commitment to support delivery.
- Commitment to biodiversity and nature recovery.
- Effective mechanisms that fairly compensate farmers and landowners for undertaking ambitious nature recovery work
- National soil policy, no primary legislation to protect soil and currently no metrics for soil health.
- Sufficient importance and statutory influence for the LNRS within the planning system.

Concerns regarding the government's growth agenda and planning reforms which seem counter to nature recovery. In particular, proposals under Planning Reform Working Paper: Development and Nature Recovery and the scrapping the existing legislation and planning policies relating to protected species.

Noted that there is a lot of good work already going on and this needs to be supported and rewarded e.g. condition of grants etc.

Appendix 1 - Mapping process

