



Developing the County's Local Nature Recovery Strategy

## Stakeholder feedback on the draft approach for shortlisting Kent & Medway Local Nature Recovery Strategy priorities

### 1. Introduction

Over the month of February, the draft approach for shortlisting Kent & Medway Local Nature Recovery Strategy priorities was available online for stakeholders to review and feedback on. The availability of the draft, and opportunity to feedback, was publicised through the MS4N newsletter (1000+ circulation), the MS4N social media channels and at the five stakeholder workshops held that same month.

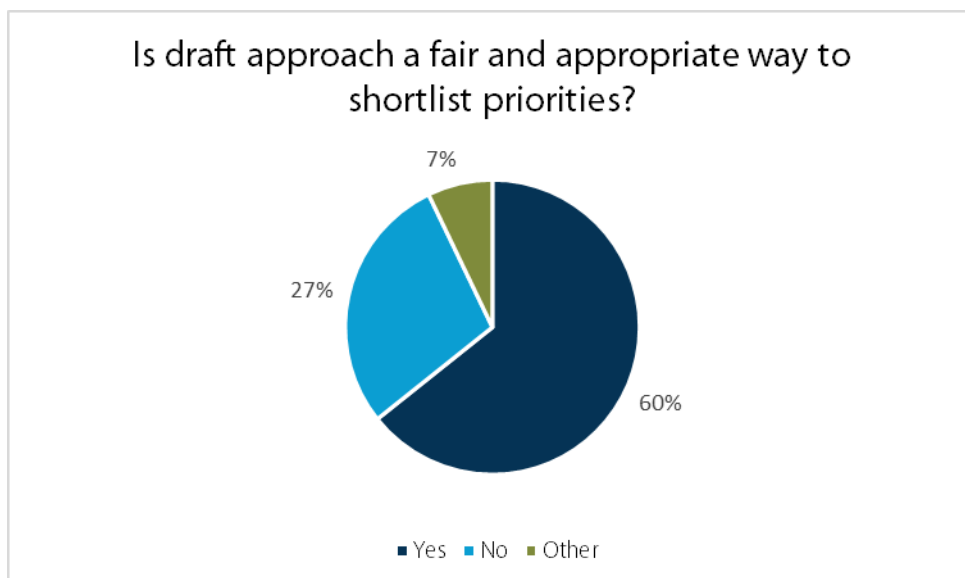
There were 15 responses received. Although a low number, the draft approach was viewed 106 times by 68 distinct users.

Feedback was collected via an online form – all but the first question were optional.

The below summarises the feedback and how this will inform the final adopted shortlisting process (text in boxes).

### 2. Feedback on shortlisting approach

Question 1 - do you consider the draft approach a fair and appropriate way to shortlist priorities for the Kent and Medway Local Nature Recovery Strategy?



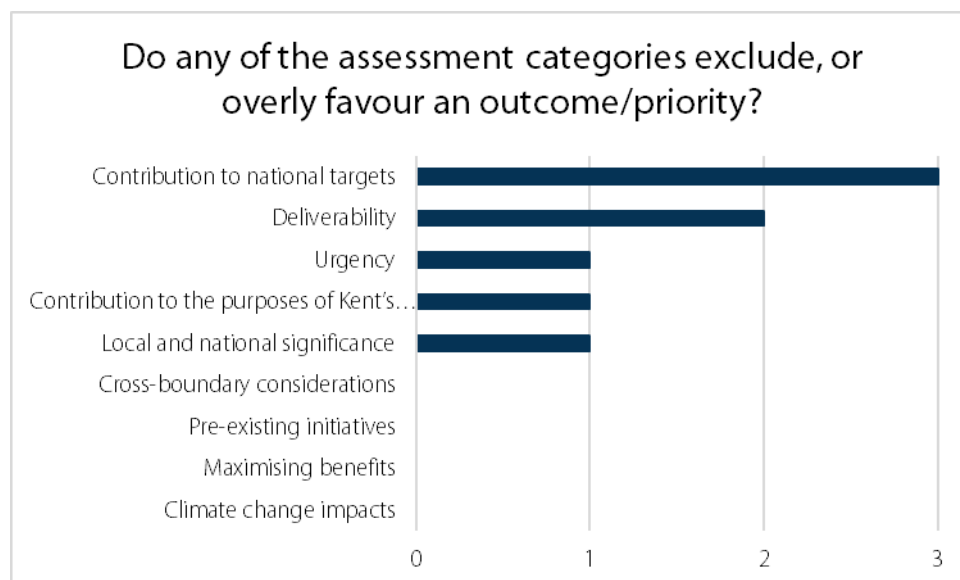
Reasons for why not considered appropriate.

- Specific sites should be considered because they may be higher weighted otherwise e.g. a nature reserve that's being threatened.
- Neighbourhood Plans should be included alongside Local Plans.
- It does not address the situation on the ground that is seeing the map change every day. No top-down desk top exercise can succeed unless it starts putting urgency as the priority, starting with the protected species and habitats that are haemorrhaging from the maps.
- My concern is that the approach will focus all activity to areas that are already protected/prioritised. There's no consideration of local value/needs. Will it create wildlife deserts, where there is no investment/protection, particularly in urban/suburban areas?

Other response - Largely seems fair and appropriate, subject to comments below.

- The [LNRS regulations and guidance](#) stipulate that priorities should not be site based. Selection/prioritisation of specific sites will be considered under the development of the areas that could become of particular importance for biodiversity. Therefore specific sites, and threats to them, will not be a consideration within the priorities shortlisting.
- Neighbourhood plans to be included in the list of plans and strategies to be reviewed.
- Acknowledgement of the current nature crisis and that the LNRS cannot take effect now.
- Shortlisting approach is focussing on priority outcomes, which will lead to actions. But it will not focus activity to site. This will be determined by mapping of areas that could become of particular importance for biodiversity, which will be informed by local values and needs and will involve the input of local communities.

Question 2 - Do any of the following assessment categories unintentionally exclude, or overly favour, a particular type of outcome/priority?



Question 3 - If you have ticked any boxes under question 2, please detail your concerns here

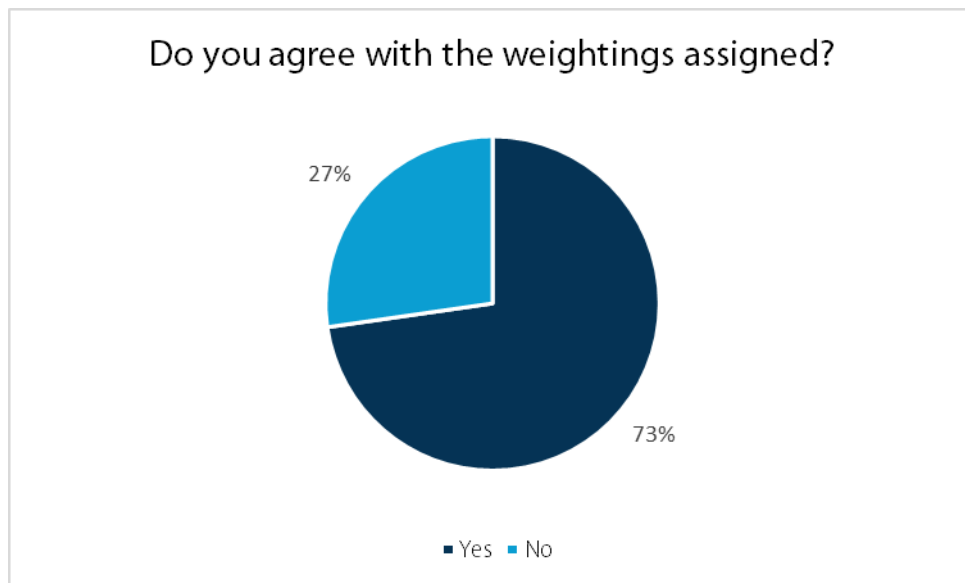
- Contribution to national targets for species abundance are not included.

- Action for 'iconic' species is included as part of the national targets – whether a species is considered 'iconic' is a matter of opinion, and in any case the inclusion of such species potentially detracts from more important conservation priorities.
- Difficult to define 'urgency' – how is it possible to judge whether action is required in the next 6 years? Will this be based on rate of decline of habitat quality or a species' population, closeness of a species to local extinction, or the need to start immediately in order to achieve measurable change by 2042?
- The urgency and the deliverability have got to be reassessed and given highest priority.
- Wouldn't want the LNRS to lose sight of more local landscapes/habitats that are important to the local population which are not necessarily protected. This would contribute to a target of improving access to nature.
- Targets are usually pretty random and difficult to measure. Locally set outcomes should be the priority, not National Targets.
- Looking at deliverability at this stage could potentially exclude important, but hard to deliver outcomes. We don't want to only focus on quick wins.
- Just to ensure this does not sway the urgent needs of Kents own habitats and species HPI and SPI.
- Commercial dumping waste from housing developments on Areas of Outstanding National Beauty and Sites of Special Scientific Interest threatens all the worthy objectives as exemplified by the dumping of around 20,000 tonnes on the Hoads Wood SSSI. Prosecuting a lorry driver for not having number plates or MOT or fining somebody involved a few tens of thousands of pounds is not a sufficient deterrent.

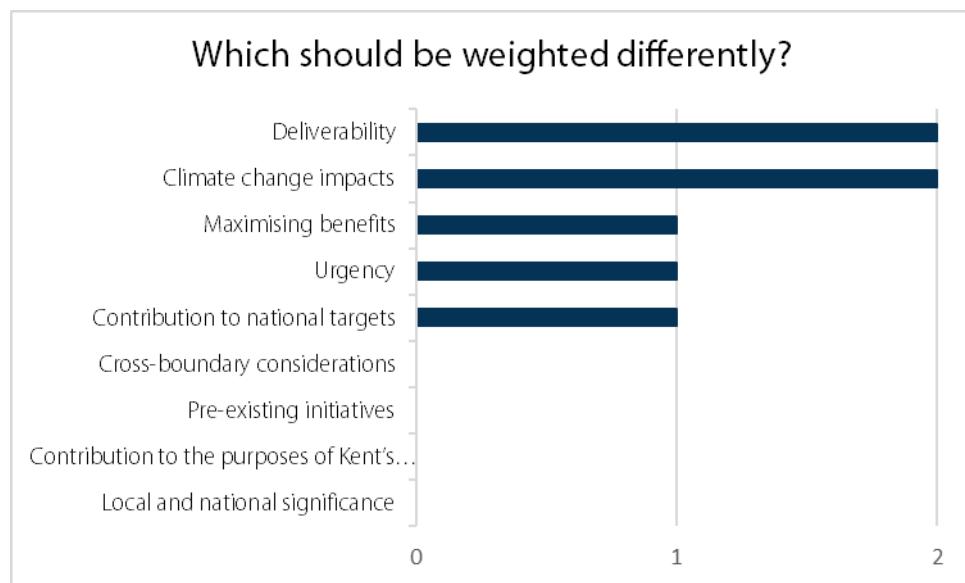
Other response - I am content that a balance has been achieved.

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| <ul style="list-style-type: none"> <li>• Specifically include reference to national targets for reducing risk of species extinction and halting and reversing species abundance decline.</li> <li>• Remove iconic as part of national target qualifying criteria – too subjective to use as a tool for shortlisting.</li> <li>• Comments relating to urgency and deliverability covered under section 5 and section 9 respectively.</li> <li>• The <a href="#">LNRS regulations and guidance</a> stipulate that priorities should not be site based. Therefore, local landscapes/habitats that are important to the local population will need to be identified at mapping stage, not priority stage.</li> <li>• <a href="#">LNRS regulations and guidance</a> require the Strategy to outline what contribution the strategy area can make to national environmental objectives, commitments and targets, including those legally binding targets established by the Act. Further it states that priorities should reflect a balance of suggestions from local partners and support national environmental objectives.</li> </ul> |
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Question 4 - Do you agree with the weightings assigned to the nine assessment categories?



Question 5 - If no, which do you think should be weighted differently?



Question 6 - Please detail the weightings you believe should be assigned and why.

#### Deliverability

- Deliverability should be medium weighting - there needs to be some certainty that improvements / creation of new habitats can be delivered.
- Urgency and deliverability. Identify the protected species and their habitats which are being destroyed right now, today, next week, next month before they even have a chance to get on your map. These are the priorities. Work from there to the top. Top down for future targets will be least effective.

#### Climate change impacts

- Climate change impacts should be higher weighted because things are being saved once they are threatened instead of acting to protect them before they get to that point and

have to put more money and resources into the projects. Also, so many targets with climate change are not being hit (we've gone over the 1.5C global warming already) so it needs to be a higher priority as the government is not taking it seriously enough.

- Climate change impacts should be a higher priority as there is no point in establishing a habitat that is going to disappear in 10+ years time due to climate change.

Maximising benefits

- We need to deliver a maximum benefits for wildlife, otherwise it's pointless.

Urgency

- Urgency and deliverability. Identify the protected species and their habitats which are being destroyed right now, today, next week, next month before they even have a chance to get on your map. These are the priorities. Work from there to the top. Top down for future targets will be least effective.

Contribution to national targets

- No comments received.

Other responses - It is clear that the authors have given time and consideration to the survey.

- Climate change to have highest weighting, bringing it in line with urgency and recognising the need to act now on climate change impacts.
- All other weightings to remain the same for first assessment process. If a further refinement is necessary, deliverability to be given enhanced weighting.

Question 7 - If you consider there are any other assessment categories that should be included to define the priorities shortlist, please note them here.

- The species and habitats being destroyed now. We are seeing it happen under our noses in our village and everywhere else must be the same. It's the whole reason for the need for this initiative and the causes are not being tackled.
- Significant sites under threat.
- Farmers are mostly on board already. Somehow, the housing developers need to be made an integral part of the process.

- The [LNRS regulations and guidance](#) stipulate that priorities should not be site based. Therefore, specific sites under threat will need to be considered at the mapping stage, not priority stage.

### **3. Feedback on assessing local and national significance**

Question 8 - Please identify any qualifying habitat criteria for local and national significance you don't consider appropriate.

- Rivers (1)
- Ponds (1)
- Wet woodland (1)

Question 9 - If there are any habitats you don't agree should qualify as locally or nationally significant, please note your reasoning here.

None given in support of the above.

- As no reasons were given to explain the why the three habitats were not considered appropriate (all three came from the same response) and no other objections to the proposed qualifying habitats were received, there will be no change to any of the original habitats listed.

Question 10 - Please note here any other habitats you think should be included in this list and why.

- Reedbeds. A priority habitat under section 41 of NERC 2006.
- Lowland fen, lowland raised peat bog, and wood pasture and parkland should all be included. While Kent does not contain substantial areas of fen and bog, it once held much more, and those that remain are of tremendous importance at county scale. Because of Kent's position close to the European mainland, maintaining habitat 'stepping-stones' may be important in climate change adaptation, and such wetlands in Kent may provide useful connections between the continent and more extensive areas of fen and bog in counties to the west of Kent. Kent holds substantial areas of wood pasture and parkland, some of which are already recognised as being of national importance.
- All that are being destroyed right now. It's a holocaust.
- Woodland, ancient woodland, veteran trees
- Ramsar and SAC qualifying features of Thanet Coast - chalk Reefs ; Submerged or partially submerged sea caves - 2nd most extensive representation of chalk caves in the UK. Or is this covered by intertidal chalk etc?
- The list of habitats above reveals the near globally unique range of habitats identified in Kent and Medway.
- Ghyll Habitat , Ancient and Long-Established Woodlands, priority habitats, geodiversity and rock outcrops eg High Weald Geodiversity NCA122 NE508

- The qualifying habitats list will be revised to include irreplaceable habitats, as defined by [The Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#) – this will cover lowland fen and ancient woodland and ancient/veteran trees.
- The chalk features of the Thanet coast are covered by the existing intertidal chalk and subtidal chalk criteria and ghyll habitat by wet woodland.
- During the development of the 2020 Kent Biodiversity Strategy, all Kent's habitats were reviewed by an expert working group, and local and national significance was considered to create the Kent priority habitat list. This priority list was peer reviewed and then publicly consulted on. Based on this, the exclusion of some of the suggested additional qualifying habitats is considered sound.
- Where specific areas of habitat are recognised as being of national importance, this will be picked up by the areas of local significance mapping work and will inform the opportunity mapping.

Question 11 - Please identify any qualifying species criteria for local and national significance you don't consider appropriate.

None

**Question 12 - If there are any species you don't agree should qualify as locally or nationally significant, please note your reasoning here.**

- It seems reasonable to assume that the test of the significance of a species should be based on (i) its threat status, and (ii) the degree to which the Kent population is significant in a national context, i.e. does Kent & Medway support a disproportionately large part of the UK breeding or wintering (in the case of some birds) population or is the Kent population significant for some other reason (e.g. it might be genetically distinct). Given these considerations, it is clearly reasonable to include nightingale, shrill carder bee, and probably true fox sedge amongst others. However, it would be harder (though perhaps not impossible) to justify the inclusion of water vole, lapwing Sandwich tern, given their wider distribution in England. Likewise (and to pre-empt Q13), it would be very easy to make a case for the inclusion of monkey orchid, man orchid, lady orchid, late spider orchid, ground-pine, wart-biter, short-winged earwig, and shining ram's-horn (to name but a few) on the basis of the proportion of their English distribution lying within Kent and Medway. If the LNRS is to be properly evidence-based, as is hoped, then a proper assessment should be made of all the long-list species in order to understand which have a particularly large part of their population in Kent.

**Question 13 - Please note here any other species you think should be included in this list and why.**

- Hazel Dormice - Kent is an important stronghold for dormice which are threatened by habitat loss, degradation and loss of connectivity, leading to a lack of resilience to development and climate change pressures.
- Fiery Clearwing moth - rare and fully protected under schedule 5 of the Wildlife and Countryside Act - found only in Kent.
- Sussex Emerald moth - rare and fully protected under schedule 5 of the Wildlife and Countryside Act. Found only at Dungeness and recently recorded at Betteshanger Country Park.
- Lizard Orchid - one of Kent's iconic species fully protected under schedule 8 of the Wildlife and Countryside Act. Two largest colonies in the UK found in the Dover District. Found only in Kent.
- Sussex Emerald Moth - rare and fully protected under the schedule 5 of the Wildlife and Countryside Act found only at Dungeness and recently recorded at Betteshanger Country Park.
- Monkey orchid - on the basis of the proportion of their English distribution lying within Kent and Medway.
- Man orchid - on the basis of the proportion of their English distribution lying within Kent and Medway.
- Lady orchid - on the basis of the proportion of their English distribution lying within Kent and Medway.
- Late spider orchid - on the basis of the proportion of their English distribution lying within Kent and Medway.
- Ground-pine - on the basis of the proportion of their English distribution lying within Kent and Medway.
- Wart-biter - on the basis of the proportion of their English distribution lying within Kent and Medway.