



## Online Briefings Q&A report

January - February 2025

## Local authorities – officers 20<sup>th</sup> January 2025

### Q - How will devolution and proposals under Development and Nature Recovery: Planning Reform Paper affect LNRS?

A – Answered to the best of our current knowledge and understanding.

Requirement for LNRS to be taken account of in local plans, minerals and waste plans and neighbourhood plans is still legally mandated, so assume any policy changes and planning reforms will not change this. Further, guidance on role of LNRS in local planning is still outstanding, so difficult to consider how this current role for LNRS may differ under the planning reforms or devolution.

What we understand on both is limited to what has been published:

[Nature Recovery: Planning Reform Paper](#) notes that new approach would:

- *help fund tangible and targeted action for nature's recovery;*
- *go beyond offsetting environmental impacts and instead use development to deliver positive outcomes for nature recovery; and*
- *give delivery partners the tools they need to generate positive outcomes for nature, empowering them to make the right choices to deliver nature recovery.*

The LNRS would seem a suitable strategy to provide the local framework for this. There is just one reference to the LNRS in the policy paper, in paragraph 25 which states:

*25. It is vital that Delivery Plans do not involve any unnecessary or duplicative work. Where all or some of the necessary evidence base is already available to a delivery body – for example, due to an extant Diffuse Water Pollution Plan (DWPP), Protected Site Strategy (PSS), Species Conservation Strategy (SCS), or Local Nature Recovery Strategy (LNRS) – this may be depended upon for these purposes. Likewise, any relevant evidence and actions identified in preparing a Delivery Plan should be made available to any other body subsequently involved in preparing a wider environmental plan or strategy covering the same area. Legislation will include a coordination duty to ensure this cooperation between relevant public bodies.*

The [Devolution White Paper](#) (page 76) announced that the Government will begin the transition by enhancing the roles and functions of the responsible authorities for Local Nature Recovery Strategies. The Government will empower these authorities, which are already operating at county or combined authority scales, with a clear mandate to take a leadership role on Local Nature Recovery Strategies and wider environmental delivery. Over time, the Government envisages Strategic Authorities will be appointed the Local Nature Recovery Strategies responsible authority where they are not already.

**Q - To be in a strategically significant area, does it need to be in both Areas of Particular Importance for Biodiversity (APIB) and Areas that Could become of particular Importance for Biodiversity (ACIB)?**

A - The strategically significant areas are denoted by the local habitat map, which comprises both APIB and ACIB. The two areas don't overlap so it will be in one or other, not both. Applying strategic significance to both ensures that sites in the APIB, especially Local Wildlife Sites, are not excluded from benefits that may come from being in a strategically significant area.

**Q - The timetable for reporting seems tight. If LPA needs to report LNRS to Cabinet, may not be able to meet 12th March deadline.**

A - 12<sup>th</sup> March is deadline for public consultation and abides with the 8-week public consultation period requirement. LPAs have had involvement all the way through the strategy development and have been advised of the timetable prior to the launch. As supporting authorities, all LPAs received the draft at pre-consultation stage in November so have had a two-month lead-in time. There will also be another opportunity for LPAs, as all supporting authorities will have a 28-day pre-publication review period in May/June 2025.

**Q - What is needed from a development management and plan making perspective is guidance on how to apply the different mapping layers; particularly where there is more than one potential measure suggested for an area/site. Will need a better steer on what are the steps required and what are the most important things to do - otherwise quite a daunting prospect.**

A - The responsible authority is aiming to build in a mechanism for the final online platform that will allow users to click on a parcel of land to see what measure applies. It is hoped that, where there is more than one measure, this can also provide an indication of which would be the most appropriate measure in the first place. The responsible authority will be speaking with potential end users of the final online tool to understand how they envisage using the mapping and identify what tools/functions might be required to support this. How far the online platform can meet these will be dependent on capabilities of the platform and the resources available to develop them.

**Q - LPAs will have difficulty in checking every element of the mapping before the consultation ends - it is impossible for it all to be checked. It is important to acknowledge that if an element of mapping looks erroneous, it can be ignored.**

A - There is no assumption that LPAs will be checking the maps to that degree - this is a job beyond any one body, including the responsible authority. The maps have been reviewed during the course of the project by partners and stakeholders and the Technical Advisory Group; plus the public consultation will allow for further scrutiny. This collective review effort is the best, and all, that can be expected.

Because it is not possible to ground truth every aspect of the strategic mapping, the document sets out clear caveats for the mapping including noting that local assessment is needed before any potential measure is implemented. Inclusion of a site on the map does not indicate a green tick for that action to happen without any of the usual checks and balances and does not preclude any necessary permissions or legislative requirements.

Important to remember that the maps are indicative – the LNRS is not instructing or dictating – all actions are suggested; they are “potential measures”.

Given the strategic and indicative nature of the mapping, there is the question of whether there will be any opportunity to challenge that the sites should or should not fall into an area of strategic significance and therefore have the multiplier applied, at planning application stage. Also no test cases of this yet.

## **NGOs and government agencies**

**22<sup>nd</sup> January 2025**

**Q – A lot of this needs to be underpinned by legislation and any attempts by government to weaken the legislation, protections and regulations is inevitably going to make a job around this harder.**

A – The requirement for LNRS to be considered in the preparation of new plans is mandated by legislation, so this requirement is anticipated to be retained. However, we are still waiting on guidance from MHCLG and Defra as to specifically what the role of local nature recovery strategies will be and, importantly, what weight an LNRS will have within the preparation of new or reviewed revised local plans.

**Q - How likely is it that the mapped areas will change through the consultation?**

A – The public consultation provides a further opportunity for people to comment on and challenge the mapping. Cannot say at this stage what, if anything, will change in respect of the mapping. The mapping used what we consider was a robust approach, overseen and steered by a technical advisory group and involved many stakeholders and partners in its development process, so would hope that, largely speaking, they are accurate and appropriate.

Given the oversight and scrutiny, we can have a pretty reasonable degree of confidence that, at the very least, the approach to the mapping is appropriate and that generally, on a landscape and strategic scale, the mapping is appropriate. Expect there will be some local discrepancies, when individuals look at the maps at the very local level, when considering the theoretical approach of the mapping.

Challenges to, and proposals for amendments of, the maps are invited as part of the consultation but these will need to be backed with reasons and justification, as opposed to anecdotal evidence or personal opinion. And this will need to link back to the delivery of the potential measure, priority and ultimately the 10 principles of the strategy. When submitting such proposals, wherever possible we would appreciate receiving the area outline digitally mapped in GIS. Also, a means by which to contact would also be appreciated, in case we have any follow up queries.

**Q - So, now that the ACIB has been determined, will those areas included within it be offered tangible incentives to participate? How will incentives be promoted?**

A – Ways in which LNRSs will be used to incentivise delivery (from Defra advice in December 2024):

- 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.
- to help groups of farmers and land managers shape nature recovery priorities for their area, and to encourage collaboration across holdings and landscapes to identify opportunities for Landscape Recovery project proposals, and to provide evidence to support their application and project development.

- to help Government when considering applications for funding for specific nature recovery activities, by acting as criteria in applications.
- to help responsible authorities and/or local partnerships leverage and target funding for environmental projects to areas where they could have the most impact for nature and the wider environment.
- to inform how Defra arms-length bodies carry out existing functions to better support nature recovery – for example, by drawing on LNRS priorities and proposals when providing land management advice to farmers, or when selecting locations for nature-based solutions such as natural flood management and tree planting.
- to inform the development and implementation of Protected Landscape management plans, by identifying locations and measures that will drive delivery of the agreed targets and outcomes set out in these plans.

Ways in which LNRSs might be used in future (from Defra advice in December 2024) - 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. LNRSs might be used:

- 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.

**Q - Will organisations with ArcGIS or similar be able to access the live layers for our own internal mapping purposes once agreed?**

A - It is our intention to make the mapping available via an online tool, with more extensive functions than currently provided by online maps for the consultation. This should allow users to fully interrogate the maps for their purposes. We envisage that we should also be able to make available to stakeholders the GIS layers for use in their own systems, once the strategy is finalised and published.

**Q - How do developers/industry feel about the LNRS - what is the feedback so far?**

A - From engagement with this sector during the course of the LNRS development, there seems general support for the strategy and its ambitions. Believe they welcome some of the clarification the LNRS brings with regards to biodiversity net gain. And get the impression that they are happy to be part of the delivery framework for the strategy, whether that's on site or off site through mitigation and their biodiversity net

gain obligations. The LNRS, and its maps, does not prevent development or operations.

**Q - Will the ACIB mapping layer be simplified? There are some very small polygons in the layer that have probably been automatically generated.**

A - There isn't the intention to simplify the mapping beyond that presented however this does raise the question of the application of the ACIB at the very local level and how the "non-definitive" boundaries apply - and what happens to the small, seemingly spurious areas of ACIB that has been generated by the approach.

Given the strategic and indicative nature of the mapping, there is also the question of whether there will be any opportunity to challenge that the sites should or should not fall into an area of strategic significance and therefore have the multiplier applied, at planning application stage. Also no test cases of this yet.

**Q - Does the map and potential measures within a APIB/ACIB apply to strategic significance of baseline habitats or just proposed habitats for creation/enhancement?**

A - The strategic significance of an area is determined by whether it is in the local habitat map. If the site is in the area denoted by the local habitat map, then strategic significance should be applied as per the guidance.

**Q - Please could you remind us of the mapping tool website link.**

A - [Kent & Medway LNRS Measures](#)

**Q - Will landowners be able to look up their landholdings?**

A - currently, the only way for a landowner to assess their landholding, will be to identify the measures they are interested in delivering and then view on the map whether they have been identified on their parcel of land.

We appreciate this is not the most user-friendly approach and aim to build in a mechanism for the final online platform that will allow users to click on a parcel of land to see what measure applies. It is hoped that, where there is more than one measure, this can also provide an indication of which would be the most appropriate measure in the first place. The responsible authority will be speaking with potential end users of the final online tool to understand how they envisage using the mapping and identify what tools/functions might be required to support this. How far the online platform can meet these will be dependent on capabilities of the platform and the resources available to develop them.

**Q - Considering that international frameworks for Biodiversity recognise the importance of human/social dimensions in conservation, it seems like a missed opportunity not including these aspects in the consultation. The participatory**

**process itself is a positive initiative, but social feasibility considerations will be necessary for the implementation of measures.**

A – The social/human dimensions of nature conservation do not heavily feature in the strategy because they sit outside the LNRS scope, which requires the strategy to only focus on actions relate to habitats and species. Within the strategy, there are some “supporting measures” identified (which are not withing the LNRS delivery scope but are included for context) that relate to the societal links to nature. Some of the potential measures mapping has looked to maximise the wider benefits, including access to nature and the health and wellbeing advantages this can bring.

However, there is a noticeable gap between the Kent Biodiversity Strategy, which dedicated a quarter of the ambitions to connection with nature, to the LNRS which places this as a benefit rather than a dedicated aim. And the LNRS will supersede the Kent Biodiversity Strategy. The Kent Nature Partnership is considering this and looking at how this gap can be filled, to make sure that the priorities and opportunities relating to this are not missed.



## **Elected officials**

**22<sup>nd</sup> and 27<sup>th</sup> January 2025**

**Q - Regarding the mapping tool, please explain why existing biodiversity net gain sites where work has started are not on it.**

The maps have been developed through a desk-based exercise, with an agreed approach to determine how measures are mapped and then how these, and other influences, are used to inform the “areas that could become of particular importance for biodiversity” (ACIB). Existing or developing biodiversity net gain (BNG) sites were not included as a standard.

Appreciate that there is an interest in where such sites fall, as it influences the final “value” of the BNG credit, as calculated by the metric. For a biodiversity net gain site to benefit from the strategic significance multiplier, it needs to fall within the local habitat map area AND be delivering action in line with the potential measures identified for that area.

Challenges to, and proposals for amendments of, the maps are invited as part of the consultation but these will need to be backed with reasons and justification, as opposed to anecdotal evidence or personal opinion. And this will need to link back to the delivery of the potential measure, priority and ultimately the 10 principles of the strategy. When submitting such proposals, wherever possible we would appreciate receiving the area outline digitally mapped in GIS. Also, a means by which to contact would also be appreciated, in case we have any follow up queries.

**Q – It’s great to see so much focus on connectivity. Are there any plans for green bridges or similar across more roads?**

A – There is priority (CON2) specifically focused on this - Fragmentation caused by arterial roads, railway and other major infrastructure retrospectively addressed, reconnecting habitats and wildlife pathways; with the following potential measures identified:

- CON2.1 Installation of functional green bridges, wildlife crossings, tunnels and other appropriate structures, alongside retrofitting existing structures, to address historic fragmentation caused by major infrastructure.
- Maintain a register of habitat fragmentation caused by major infrastructure to enable a pipeline of projects for funding and investment.
- All new infrastructure to consider fragmentation impacts and design connectivity mitigation into the scheme from the start.

For priority WTH4 Ensure the resilience of the county’s woodlands, there is the potential measure WTH4.4 establish green bridges to connect woodlands fragmented by road and rail.

And under Priority URB1 Address habitat fragmentation of the urban environment, ensuring urban species can freely move about and developed areas and infrastructure does not impede passage, there is the potential measures of:

- Green bridges and tunnels installed (or existing crossings modified) to traverse new and existing barriers to wildlife movement in the urban environment.
- Use green roofs, walls and other features at bus shelters, bus and train stations and bridges to extend the wildlife network.

During the course of the LNRS development, National Highways put out a call to all responsible authorities to ask for, from emerging plans, proposed sites for the installation of retrospective crossings for road and rail infrastructure; Kent submitted a number, following consultation with partners for sites they would like to see put forward.

**Q - How do you think the Government's plans for reforming the planning system will affect the implementation of the LNRS?**

A - Answered to the best of our current knowledge and understanding.

Requirement for LNRS to be taken account of in local plans, minerals and waste plans and neighbourhood plans is still legally mandated, so assume any policy changes and planning reforms will not change this. Further, guidance on role of LNRS in local planning is still outstanding, so difficult to consider how this current role for LNRS may differ under the planning reforms or devolution.

What we understand on both is limited to what has been published:

[Nature Recovery: Planning Reform Paper](#) notes that new approach would:

- *help fund tangible and targeted action for nature's recovery;*
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The LNRS would seem a suitable strategy to provide the local framework for this. There is just one reference to the LNRS in the policy paper, in paragraph 25 which states:

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The [Devolution White Paper](#) (page 76) announced that the Government will begin the transition by enhancing the roles and functions of the responsible authorities for Local Nature Recovery Strategies. The Government will empower these authorities, which are already operating at county or combined authority scales, with a clear

mandate to take a leadership role on Local Nature Recovery Strategies and wider environmental delivery. Over time, the Government envisages Strategic Authorities will be appointed the Local Nature Recovery Strategies responsible authority where they are not already.

**Q - Were community groups and or young people consulted during the strategy development?**

A - The strategy development strived to provide opportunities for meaningful engagement and participation throughout with a series of workshops across the process of the strategy. There were also opportunities to get involved through online surveys and toolkits for self-led workshops to help people shape their feedback.

Community groups were involved in all workshops and were in fact one of the highest represented sectors. For young people, we created a schools pack, delivered an activity for young people at the Living Land Show and held an event at the county show for young farmers.

**Q - If LNRS doesn't give any statutory protection or enforce any change in land use, how will it stop development in an area identified as having value or potential future value for nature recovery? What actual "teeth" does the strategy have?**

A - The LNRS will not prevent development. Protection can only be provided by existing site designations, legislation and local planning policy.

The LNRS will have an influence on local planning, given there is a statutory requirement on local planning authorities to take account of the local nature recovery strategy (once published) within their local planning process. What this "take account" amounts to in practice is not yet known, as we are waiting on guidance on the role of the LNRS in local planning.

The LNRS also has a role within biodiversity net gain, by determining where in the county the strategic significance multiplier applies. Where land falls into the local habitat map developed by the strategy, the multiplier increases the biodiversity value of the land, whether than be the land impacted by development - or the land where the gain is to be delivered. Over time this could assist in steering development away from areas of strategic significance for biodiversity and straight away will steer biodiversity net gains to where they will deliver the greatest benefits for biodiversity.

The other potential role for the strategy is that local nature recovery strategies may be used as an evidence base for the Government's 30 by 30 target, which aims to effectively conserve and manage 30% of England's land and seas by 2030.

**Q - There appears to be a lot of onus on the landowner to do the improvements. Is there anything you can tell us about funding that might be an option for them?**

A - Defra recently advised that the LNRS will:

- 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.

**Q – What involvement did the Kent Downs and High Weald National Landscape units have in the strategy development?**

A- Both units were involved in all levels of the strategy development. Their Directors sat on the Board and officers on the delivery group. They were also involved in the technical advisory groups. They attended the various workshops. The project held a dedicated session with each unit to review the draft mapping.

**Q – Why does Thanet appear to have so little opportunity for nature recovery when viewing the “areas that could become of particular importance for biodiversity” map? Does that mean that we don't have any potential for nature?**

A – Thanet, and other areas, may look a little sparse when it comes to looking at the “areas that could become of particular importance for biodiversity” but this absolutely does not mean that there is no potential for nature recovery in these areas. In fact, its quite the opposite with many potential measures for these areas relating to actions that need to occur on a broadscale. This is often because of the current landscape/land use of these areas – for instance, high grade agricultural land and big urban areas.

White space does not mean that there is no nature recovery opportunity in this area - rather that within the parameters of the ACIB mapping, this area wasn't as strategically significant for nature recovery as others.

The foundation of the ACIB was the mapped potential measures. But as the purpose of the LNRS is to focus/target nature recovery to where it is most need, and where it will deliver the greatest benefit, we could not we could not map everything at the “areas that could become of particular importance for biodiversity” (ACIB) scale – even though we know that anywhere and everywhere does have the potential to become of particular importance for biodiversity.

As a result, measures that were insufficiently refined (either because they were widely applicable or because of mapping limitations) were excluded – largely this excluded measures which were not focused on restoration, creation or connection. These then further refined by prioritising areas that also delivered on wider environmental and social benefits, with a final refinement placing priority on connectivity, focussing on areas of low species flow, connectivity bottlenecks and buffering and/or linking of existing “areas of particular importance”.

There are areas in the county that do not feature in the ACIB but where action is absolutely still required. This is especially the case on agricultural land, where re-creation of a habitat may not be appropriate because of the value of the land to food production but where management interventions are still identified as necessary and could make a massive difference to nature - simply widening field margins or reinstating hedgerows can help return lost habitat, forage and shelter and enable nature to return and move better across the landscape. It was also a challenge to target some of the urban measures or measures within urban areas - again, in these areas potential measures are identified, they may just not feature on the ACIB.

When looking at opportunities for nature recovery, it is better to look at the individual potential measures map - this is where the crucial detail lies; indicating what and where action will deliver the greatest benefits and target most at need. The "areas that could become of particular importance for biodiversity" is a strategic level map, working at a county-wide level. A potential measure may have huge value locally, that is not reflected when considered strategically at a county scale - therefore exclusion of an area from the mapping does not indicate that action is not applicable.

**Developers and business**  
**28<sup>th</sup> January 2025**

**Q - Where online do we find the mapping tool?**

**A - [Kent & Medway LNRS Measures](#)**

## Community Groups 29<sup>th</sup> January 2025

Q – Where online do we find the mapping tool?

A - [Kent & Medway LNRS Measures](#)

Q – In view of the Government's announcement that developers should be able to stop worrying about bats and newts and development will be prioritised, what confidence can we have that any of this is really implementable?

Requirement for LNRS to be taken account of in local plans, minerals and waste plans and neighbourhood plans is still legally mandated, so assume any policy changes and planning reforms will not change this. Further, guidance on role of LNRS in local planning is still outstanding, so difficult to consider how this current role for LNRS may differ under the planning reforms.

What we understand on reforms to planning is limited to what has been published:

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The paper restates the legally binding commitment to clean our waterways, reduce waste across the economy, plant millions more trees, improve air quality, create nature rich habitat, and halt the decline in species by 2030. We will be responding to the consultation on the nature recovery planning reform paper and questioning how these commitments will be ensured within the current plans for reform.

Q – What can the LNRS do for building dependent species, such as swifts, which are using buildings rather than areas of habitat?

A - The urban section of the strategy is focussed on ensuring that space is made for nature within the urban environment. This includes the following potential and supporting measures:

- Install appropriate ecological features, including swift bricks [40], house martin artificial nest cups, bat tiles, bird boxes, hedgehog highways, bug hotels, reptile refugia etc, especially where there are known key or declining populations.
- Installation of ecological features a standard practice for all new builds across the county.

Swifts are also identified as one of the 141 priority species for the county.

**Q - Is there the potential for local climate and nature assemblies who could take local ownership for developments? Assemblies can be very important in a planning context, which is often very oppositional developers versus local people, etc. And this can give better outcomes where everyone feels genuinely heard.**

A - This sits outside of the LNRS scope and is one that will need to be decided at a district/borough level. However there are some real benefits to ownership being taken at the local level.



## **Landowners, farmers, growers and producers 31<sup>st</sup> January and 3<sup>rd</sup> February 2025**

**Q – With regards to the “areas that could become of importance for biodiversity”, our land holding is mapped in parts, and then there are some areas that are included that we consider to have less potential than others not included. Is this consultation process an opportunity to amend or add to the “areas that could become of importance for biodiversity”?**

A – The mapping was a desk-based exercise which is likely to have resulted in some anomalies when looked at on the ground. Input to correct these is welcomed.

Challenges to, and proposals for amendments of, the maps are invited as part of the consultation but these will need to be backed with reasons and justification, as opposed to anecdotal evidence or personal opinion. And this will need to link back to the delivery of the potential measure, priority and ultimately the 10 principles of the strategy. When submitting such proposals, wherever possible we would appreciate receiving the area outline digitally mapped in GIS. Also, a means by which to contact would also be appreciated, in case we have any follow up queries.

**Q - How come the measures don't have quantifying targets?**

A – The strategy is directed by Defra and Natural England and devised following statutory guidance. Responsible authorities have been told not to include targets in the local nature recovery strategy.

We recognise that this is an important missing element in terms of allowing the strategy to monitor its progress – and will be particularly important at review and revision. Once the strategy is published, Kent's delivery partners for nature recovery will need to consider if and how we feel this gap.

**Q – Where online do we find the mapping tool?**

A - [Kent & Medway LNRS Measures](#)

**Q – The “areas of particular importance for biodiversity” (APIB) map missed some newly cited local wildlife sites – can this map be revised?**

A – Before publication the APIB map will be fully updated, to ensure it takes into account any new or extended designated sites, local wildlife sites and local nature reserves.

**Q – There are 52 priorities, which is a long list. Is there going to be some kind of prioritising of the priorities. And how does this relate to the purpose of the LNRS to target very particular areas?**

A – The priorities have been streamlined, starting with an initial list of over 800 outcomes that stakeholders wanted to see for nature.

Whilst there will be no further refinement of the priorities in terms of numbers, we will look to prioritise further the potential measures in terms of where they are targeted to. There are locations where there is more than one potential measure mapped. This was deliberate, so that no opportunity for nature recovery was missed and that broad areas consider a range of habitats, to create the mosaic that nature recovery needs. However we appreciate that this could then be confusing for landowners, as to which action should be taken. We will therefore be looking to offer a steer on which actions should be prioritised and how to determine this.

**Q – The thing that sets this strategy apart from others seen to date, is the fact that there's multiple overlapping measures, which I really like because it means that you can make good conservation decisions on the ground depending on the local situation, which obviously you can't with a desk-based mapping approach. Have you received much pushback from Natural England or Defra about the multiple overlapping measures rather than one for every specific area?**

A – There are a number of reasons why we have ended up with multiple measures mapped in certain locations. The first two are for ecological integrity - that no opportunity for nature recovery was missed and that broad areas consider a range of habitats, to create the mosaic that nature recovery needs.

The third is because we have ended up with extensive mapping of our potential measures because the decision was taken to map all, even if the couldn't be tightly defined to areas of most need and greatest benefit. This approach resulted from the stakeholder review of the maps. The initial approach of just mapping measures that could be sufficiently refined, meant that some areas of the county appeared from the mapping to have no potential or importance for nature recovery, when instead these were areas where measures largely related to improving management (and therefore there was little on which to prioritise one area over another), or the available data just simply wasn't sufficient to enable the required refinement. Stakeholders understandably viewed this as problematic, and felt it misrepresented the actual value of these areas to nature recovery. The decision was therefore taken to map every potential measure that could be mapped, even if this was only to the extent of basing opportunity on existence of habitat type or potential for that habitat type.

Natural England have accepted this justification but do still require us to review where potential measures overlap and provide advice on which should be prioritised for action first. This will be developed between now and publication.

**Q – Can I clarify: in the in the government guidance, it's it states that if your site is recorded within the ACIB or APIB layer, and the measure is consistent with habitat changes proposed, then the strategic significance baseline should be recorded as low. Is this correct?**

A – Correct to follow the government guidance.

**Q – Can I suggest changes to the online tool – for instance:**

- That a description of the measure appears alongside the reference number in the layers at the side; saves jumping back and forth.
- That the map doesn't zoom to county view when you select to view an additional measure.
- Inclusion of a legend for what the different mapping colours indicate.

A – The current online tool is limited in its functionality and we appreciate the way in which things are presented is not the most user-friendly. We aim to build in a mechanism for the final online platform that will allow users to click on a parcel of land to see what measure applies. It is hoped that, where there is more than one measure, this can also provide an indication of which would be the most appropriate measure in the first place.

Whilst the consultation is not seeking feedback on the current tool, users are welcome to email their thoughts. The responsible authority will be speaking with potential end users of the final online tool to understand how they envisage using the mapping and identify what tools/functions might be required to support this. How far the online platform can meet these will be dependent on capabilities of the platform and the resources available to develop them.

**Q - Would the blue areas be considered mid-tier strategic significance for BNG?**

A – Our understanding is that medium strategic significance category will not apply where an LNRS has been published – see table 7 of [The Statutory Biodiversity Metric](#)

**Q - If we identify an area on the interactive map which we think should be considered as part of the ACIB, is there a way of doing this?**

A - Challenges to, and proposals for amendments of, the maps are invited as part of the consultation but these will need to be backed with reasons and justification, as opposed to anecdotal evidence or personal opinion. And this will need to link back to the delivery of the potential measure, priority and ultimately the 10 principles of the strategy. When submitting such proposals, wherever possible we would appreciate receiving the area outline digitally mapped in GIS. Also, a means by which to contact would also be appreciated, in case we have any follow up queries.

**Q – Any inkling of how the LNRS feeds into the Land Use Framework?**

A – Despite many references to nature and nature recover, the [Land Use consultation](#) makes just one reference to the LNRS:

*We want there to be greater local and regional democratic accountability over land-use decision making, including spatial strategies for land at local and regional scales. This includes strengthening connections between national, regional and local plans for land. We have heard that the range of locally led, land-related plans and strategies has sometimes led to a siloed or confusing picture of land use change. There are opportunities*

*in joining them up and presenting land managers with a more consistent and structured view of what the greatest opportunities for their land are likely to be.*

*Local Nature Recovery Strategies (LNRS) are being developed across the country to prioritise actions and areas for environmental enhancements. LNRSs will also enable Local Plans to better reflect the needs of nature recovery by helping Local Planning Authorities determine which areas should be mapped and safeguarded. To help connect plans at different scales, Government will collate relevant data generated through LNRSs and our biodiversity targets monitoring programme, share it with local leaders, and use it in the evaluation and development of national policy.*

*The footnote for LNRS states: Local Nature Recovery Strategies (LNRSs) are a new system of spatial strategies for nature recovery, currently in preparation across the country. The first LNRSs were published in 2024 with the remainder during 2025. It is required by law that LNRSs will be periodically reviewed and updated, taking stock of what has been delivered over the period so that priorities and actions can be updated as needed. The Land Use Framework will inform and assist this process after the first LNRSs are published.*

This implies that it is the Land Use Framework that will inform the LNRS, rather than the other way around. However details are very sketchy.

**Q – What are the timelines for the strategy’s completion?**

A – Public consultation ends on 12<sup>th</sup> March. The consultation report will be published late spring, alongside the revised Local Nature Recovery Strategy. We are required to allow supporting authorities a 28 day pre-publication review period, during which they have the ability to raise objections should they wish to. Currently aiming for publication mid to late summer.

## **General**

**3<sup>rd</sup> and 4<sup>th</sup> February 2025**

**Q - There appears to be no level of compulsion for the LNRS to be taken into consideration in planning matters – so how will it stop development?**

A - The LNRS will not prevent development. Protection can only be provided by existing site designations, legislation and local planning policy.

The LNRS will have an influence on local planning, given there is a statutory requirement on local planning authorities to take account of the local nature recovery strategy (once published) within their local planning process. What this “take account” amounts to in practice is not yet known, as we are waiting on guidance on the role of the LNRS in local planning.

The LNRS also has a role within biodiversity net gain, by determining where in the county the strategic significance multiplier applies. Where land falls into the local habitat map developed by the strategy, the multiplier increases the biodiversity value of the land, whether than be the land impacted by development – or the land where the gain is to be delivered. Over time this could assist in steering development away from areas of strategic significance for biodiversity and straight away will steer biodiversity net gains to where they will deliver the greatest benefits for biodiversity.

**Q - How does the strategy address con urbanisation, with the expansion of settlements and ribbon development?**

A - The LNRS identifies broad areas where action for nature should be targeted or where specifically potential measures should be targeted.

In terms of addressing urban sprawl and its impact on the natural environment, that's something that sits with local planning to manage and plan for, ensuring that it is delivered in a sustainable way.

An increase in urban areas is inevitable, given the increasing population. So the strategy includes priorities and potential measures for the urban environment, including influencing new development to be more mindful of making space for nature and ensuring that such development does not impede wildlife movement.

**Q - Once the consultation is complete, what will be the review period for the mapped layers?**

The review period for the mapped layers is the same as the public consultation period – ending on 12<sup>th</sup> March.

**Q - Is it possible to make the map layers available through KLIS which has increased functionality?**

A – The current online tool is limited in its functionality and we appreciate the way in which things are presented is not the most user-friendly. We aim to build in a mechanism for the final online platform that will allow users to click on a parcel of land to see what measure applies. It is hoped that, where there is more than one measure, this can also provide an indication of which would be the most appropriate measure in the first place.

Whilst the consultation is not seeking feedback on the current tool, users are welcome to email their thoughts. The responsible authority will be speaking with potential end users of the final online tool to understand how they envisage using the mapping and identify what tools/functions might be required to support this. How far the online platform can meet these will be dependent on capabilities of the platform and the resources available to develop them.

**Q - What teeth does the LNRS have to make change happen, rather than just offer advice? I am concerned that the strategy will sit on a shelf and never be actioned.**

Defra have advised that action will be incentivised by using the LNRS 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.

Once the Strategy is published, the Strategy area's planning authorities will be required to take account of the Local Nature Recovery Strategy in the preparation of new/revised local, minerals and waste and neighbourhood plans. This is an important role for the Strategy, ensuring nature, and opportunities for its recovery, is considered within future plans for the county.

The LNRS also informs biodiversity net gain. The BNG metric includes a strategic significance multiplier which relates to the "local habitat map" and the potential measures that fall within this. High strategic significance will be applied when the habitat parcel is located in an area proposed to help deliver the LNRS priorities AND the intervention is consistent with the potential measures proposed for that location.

**Q - What are the financial incentives associated with the LNRS for getting woodlands into management (one of the objectives of the strategy) in Kent?**

A – Defra recently advised that the LNRS will:

- 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.

**Q – When does the consultation period end and when does the LNRS have to be published?**

A – Public consultation ends on 12<sup>th</sup> March. The consultation report will be published late spring, alongside the revised Local Nature Recovery Strategy. We are required to allow supporting authorities a 28 day pre-publication review period, during which they have the ability to raise objections should they wish to. Currently aiming for publication mid to late summer.

**Q – What is the policy/strategy for invasive species?**

There are a number of priorities and potential measures relating to invasive species:

- Priority GL4 - acid grassland and heathland habitat: Control/remove early successional species and invasive, over abundant or non-native species
- Priority WTH1 – existing woodland and trees outside woodland: Management and/or removal of invasive and inappropriate non-native species.
- Priority WTH4 – resilience of the county’s woodlands: Remove invasive species.
- Priority WTH5 – ancient woodland, and ancient and veteran trees are safeguarded from loss, with damaged areas restored through natural processes, management and the removal of invasive trees and plants. Areas of ancient woodland are buffered and better connected.
- Priority WTH7 – gill woodland: Control of invasive species that may impact gill woodlands.
- Priority WTH8 – species-rich hedgerows: (WTH8.2) Actively manage the county’s hedgerows, fill gaps and remove invasive species.
- Priority FW1 – rivers and streams and associated floodplains: (FW1.1) Monitor, manage, control expansion and remove invasive species, including Himalayan balsam, mink, from ponds, lakes, wetlands, rivers and streams and lowland drains. Plus supporting measure of county-wide/catchment-wide management strategy for freshwater invasives, including addressing distribution from headwaters and through vessels such as houseboats in the estuary.
- Priority FW8 - Maintain and enhance ponds with high ecological value and restore those lost or degraded. Enhance lake habitats and create new ponds, especially as part of a mosaic of habitats. Safeguard all pond habitats from run-off pollutants and

- invasive species, while allowing successional habitats to develop where appropriate.
- Priority CL3 – seagrass: (CL3.2) Remove invasive spartina to reduce smothering of seagrass.

Priority CL5 – native oyster beds: (CL5.2) Remove invasive, non-native species from the native beds.

Priority CL7 – vegetated shingle: (CL7.1) Manage encroachment through scrub and invasive flora removal and where appropriate, apply non-intervention management so that natural processes such as wind and waves can maintain the various successional stages from bare mobile shingle to more stable vegetated shingle and allow habitat features to develop and evolve. Safeguard existing habitat through access and management and interventions (e.g. allocated routes and boardwalks) that minimise

- the impact of footfall on this delicate habitat
- White-clawed Crayfish priority species: Avoid removing downstream in-river structures where these are protecting White-clawed Crayfish from invasive Signal Crayfish and other non-native crayfish species.