

Public Document Pack



Democratic Services
White Cliffs Business Park
Dover
Kent CT16 3PJ

Telephone: (01304) 821199
Website: www.dover.gov.uk
e-mail: democraticservices@dover.gov.uk

12 March 2025

Dear Councillor

NOTICE OF DELEGATED DECISION – (DD44 24) KENT AND MEDWAY LOCAL NATURE RECOVERY STRATEGY – PUBLIC CONSULTATION

Please find attached details of a decision taken by Louise May, Director of Place and Environment, in relation to submitting comments on the Kent and Medway Local Nature Recovery Strategy on behalf of the Council.

As a non-Key Officer decision, call-in does not apply (paragraph 18(a) of Part 4 (Rules of Procedure) of the Constitution).

Members of the public who require further information are asked to contact Democratic Services on 01304 872303 or by e-mail at democraticservices@dover.gov.uk.

Yours sincerely

A handwritten signature in cursive script that reads "Kate Bailey - Smith". Below the signature is a short horizontal line.

Democratic Services Officer

ENCL

1 **NOTICE OF DELEGATED DECISION - (DD44 24) KENT AND MEDWAY LOCAL NATURE RECOVERY STRATEGY - PUBLIC CONSULTATION** (Pages 2-48)

Decision Notice

Delegated Decision

Decision No:	DD44
Subject:	KENT AND MEDWAY LOCAL NATURE RECOVERY STRATEGY – PUBLIC CONSULTATION
Date of Decision:	12 March 2025
Notification Date:	12 March 2025
Implementation Date:	12 March 2025
Decision taken by:	Louise May, Director of Environment and Place (Deputy Chief Executive)
Delegated Authority:	<p>Authority delegated by Cabinet at its meeting held on 3 June 2024 (Cabinet Decision CAB 10):</p> <p>(b) That the Biodiversity Duty Objectives and associated initial actions set out in Appendix 1 to the report, and the proposed reporting timescales, be approved.</p> <p>(c) That authority be delegated to the Strategic Director (Place and Environment) to progress the delivery of the objectives and initial actions.</p> <p><i>The relevant objective and initial actions in Appendix 1 referred to in CAB 10 (b) above are as follows:</i></p> <p><i>Objective: To ensure Dover District Council contributes to the preparation of, and implementation of, the following relevant strategies:</i></p> <ul style="list-style-type: none"> <i>• Local Nature Recovery Strategy</i> <i>• Species Conservation Strategies</i> <i>• Protected site strategies</i> <p><i>Proposed initial actions: 1.1 To continue to be involved with and cooperate with KCC who are preparing the LNRS; 1.2 Further actions related to the LNRS will be identified once it is finalised in 2025, and incorporated into DDC strategies, where possible.</i></p>
Decision Type:	Non-Key Executive Decision
Call-In to Apply?	No (<i>Call-in does not apply to non-Key Officer decisions</i>)
Classification:	Unrestricted
Reason for the Decision:	<p>Kent County Council is required to undertake a public consultation on the draft Local Nature Recovery Strategy before it is published. Dover District Council is a Supporting Authority (under The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023). Dover District is included within the LNRS, which is a Kent-wide strategy, and the Council will be a key user, so it is important for our comments to inform the final document.</p>

Recommendation:	To agree the comments to be submitted by Dover District Council on the draft Kent and Medway Local Nature Recovery Strategy. The completed Consultation Questionnaire, including the Dover District Council response, is attached at Appendix 1.
-----------------	--

1. Summary and Background

- 1.1 The Environment Act 2021 sets in place a requirement for the development of Local Nature Recovery Strategies. Local Nature Recovery Strategies (LNRSs) are a new, England-wide approach to targeting nature recovery. There will be 48 LNRSs covering the whole of England, with each LNRS agreeing priorities and actions for nature's recovery and broader environmental benefits in the relevant Strategy Area.
- 1.2 Responsible Authorities were appointed to lead on the preparation of these strategies, and for Kent and Medway this was Kent County Council. Dover District Council is a 'supporting authority' (as set out in the legislation) in the preparation of the LNRS. This role gives the Council the opportunity to help shape the LNRS, provide local data and information and periodically review and agree drafts of the LNRS.
- 1.3 It is important for the Council to be involved in the preparation of the LNRS because it will be a key user of the LNRS. The LNRS will, for example:
- Inform the roll out of Biodiversity Net Gain (helping to guide where off-site habitat is created and enhanced);
 - Be relevant to the Council's statutory duty to take action to conserve and enhance biodiversity;
 - Guide investment into local priorities for biodiversity protection and enhancement;
 - Shape how future funding for farming and land management such as the Environment Land Management schemes will be used;
 - Provide a source of evidence for local planning authorities, helping to understand locations important for conserving and restoring biodiversity
- 1.4 In November 2024, Kent County Council provided the Council with a draft LNRS and embarked on the pre-consultation review stage of LNRS preparation. On 12 December 2024 the Council agreed it was content for Kent County Council to proceed to public consultation.
- 1.5 The draft Local Nature Recovery Strategy is currently out for 8 weeks' consultation, with a deadline for comments of 12 March 2025.
- 1.6 The draft LNRS is made up of the following parts:
- a) Part 1: Setting the scene for Nature Recovery for Kent and Medway:
- This part provides the background to the strategy. It explains what the LNRS is and how was developed. It describes what makes Kent's and Medway's landscapes and nature so special, considers the changes in distribution and extent of habitats and species and the pressures, threats and challenges driving those changes. It identifies nature recovery opportunities.
- b) Part 2: Kent and Medway LNRS priorities, potential measures and areas that could become of particular importance for biodiversity:
- This part of the LNRS explains the Local Habitat Map, the overarching principles for nature recovery and the strategy's ambitions for nature recovery. It proposes priorities and potential measures relating to connectivity; nature-based solutions; land management and land use; species, and habitats

(grassland, successional habitats, woodland, trees and hedgerows; freshwater habitats, urban habitats and coastal habitats).

c) Part 3: Kent and Medway LNRS mapping:

This part of the LNRS provides spatial mapping of the potential measures, as well as the Local Habitat Map. The Local Habitats map is made up of the areas of particular importance for biodiversity (APIB) and the areas that could be of importance for biodiversity (ACIB).

The APIB map includes national conservation sites, local nature reserves and local wildlife sites. It also includes a number of irreplaceable habitats, including ancient woodland.

The ACIB map proposes the areas where effort should be concentrated to restore habitat and achieve the greatest gains for nature.

d) Appendices:

The appendices include technical documents and user guides, including methodology for mapping and data sources.

1.7 Dover District Council has completed the Consultation Questionnaire which accompanies the consultation. The questionnaire and consultation responses are attached at Appendix 1.

1.8 In summary the comments indicate that Dover District Council broadly agrees with the priorities and measures for nature recovery. Some comments express concern about the presentation of the mapping associated with the LNRS, and the data used to map potential measures. Dover District Council has requested a technical document which sets out how the LRNS should be used to inform decisions about a particular site and will request that Dover District Council data is used to ensure that protected open spaces in the Dover District Council are accurately represented.

2 Identification of Options

2.1 Option 1: To make comments on the draft Kent and Medway Local Nature Recovery Strategy.

2.2 Option 2: To decline to make comments on the draft Kent and Medway Local Nature Recovery Strategy.

3 Evaluation of Options

3.1 Option 1 is recommended. This is the opportunity for Dover District Council to make comments on the Draft Strategy. Not to make comments on the strategy may result in those matters remaining unaddressed.

4 Any Conflicts of Interest Declared?

4.1 None.

5. Supporting Information *(as applicable)*

5.1 None

6. Resource Implications

6.1 The Council's role as a supporting authority for the Local Nature Recovery Strategy is being carried out within existing budgeted staff resources.

7. Climate Change and Environmental Implications

7.1 The Local Nature Recovery Strategy is necessary for nature's sake and for a range of services that we rely on nature for. This includes managing and mitigating the impacts of climate change and making the natural environment more resilient and adaptable.

8. Corporate Implications

8.1 Comment from the Director of Finance (linked to the MTFP): No further comments.

8.2 Comment from the Solicitor to the Council: The Solicitor to the Council has been consulted in the preparation of this decision notice and has no further comments to make.

8.3 Comment from the Equalities Officer: This report seeking agreement for the comments to be submitted by Dover District Council on the draft Kent and Medway Local Nature Recovery Strategy does not specifically highlight any equality implications. In discharging their duties Members are required to comply with the public sector equality duty as set out in Section 149 of the Equality Act 2010 <http://www.legislation.gov.uk/ukpga/2010/15/section/149>

9. Background Papers

Pre-consultation Review draft of the LNRS, made up of the following parts:

- a) Part 1: Setting the scene for Nature Recovery for Kent and Medway;
- b) Part 2: Kent and Medway LNRS priorities, potential measures and area that could become of particular importance for biodiversity;
- c) Part 3: Kent and Medway LNRS potential measures mapping;
- d) Part 4: Appendices.

Contact Officer: Jillian Barr, Senior Policy Officer

APPENDIX A

Consultation Questionnaire

Section B - Process for developing the LNRS and the application of the Strategy

In this section of the questionnaire you can provide feedback on whether the Strategy is clear and easy to understand, how confident you are in the resulting strategy and whether it will deliver nature recovery in Kent and Medway. You can also tell us if it strikes a balance between ambition and deliverability and is clear about what it is not doing.

You can answer all or as many of the questions as you like. If you would rather not provide feedback on a question, just move on to the next one.

Q4. Is the LNRS clear and easy to understand? Please select **one** option.

<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q4a. If you have answered 'Partially' or 'No', please tell us how we could make it clearer and/or easier to understand.

If your comment is about a specific part of the Strategy, please make that clear in your answer.

The LNRS is beautifully presented and illustrated. It is important, however, that the LNRS is accompanied by a technical document, which explains how it should be used by ecologists, conservation and land management professionals, developers and planning professionals. Currently this information is in part 2 of the document but is hard to find and insufficiently detailed. This could include questions and answers. For example: If numerous measures are relevant to a particular site, how should the measure that is most appropriate / beneficial to nature recovery be identified? How is the information in the LNRS applied to a site that is not on the Local Habitat Map?

In Part 1, section 1.4 (pages 7 to 8) we set out how the Strategy has been developed.

Q5. Do you believe that the LNRS development process has been sufficiently comprehensive, participatory and based on the best available information? Please select one option.

<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q5a. If you have answered 'Partially' or 'No', please tell us what element of the development process has not been sufficient.

The extent to which the LNRS can be comprehensive is limited by the time constraints that the development team have been working to.

It is not always clear that the best available information has been used. KCC is encouraged to consider consultation responses carefully and ensure that opportunities to incorporate evidence, information and expertise from local people and organisations are used to the best effect.

The development team have already agreed to incorporate some local open space data from Dover District Council. The council would also request that habitat bank opportunities identified by Dover District Council are incorporated in the ACIB. These are carefully assessed as having potential for relevant habitats.

Q6. How confident are you that the LNRS will deliver nature recovery in Kent and Medway? Please select one option only.

<input type="checkbox"/>	Very confident
<input checked="" type="checkbox"/>	Fairly confident
<input type="checkbox"/>	Neither confident nor unconfident
<input type="checkbox"/>	Fairly unconfident
<input type="checkbox"/>	Very unconfident
<input type="checkbox"/>	Don't know

Q6a. Please use the box below if you'd like to provide context to your answer.

There is still some way to go to ensure the mapping of identified measures is sufficient. The document is very complicated and the limitations of the ACIB mapping needs to be more carefully explained for each measure.

With no targets or monitoring requirement for the LNRS, the extent and impact of nature recovery action has no framework for measuring success. Establishing a biodiversity baseline and measuring changes will be essential for delivery of the LNRS, BNG and improvements to the condition of protected sites. Given the impact of climate change and the scope of the Environmental Improvement Plan it would be useful if this was designed and coordinated nationally.

Q7. How much do you agree or disagree that the LNRS strikes a balance between ambition and deliverability? Please select **one** option only.

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Tend to agree
<input checked="" type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Tend to disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	Don't know

Q7a. Please use the box below if you'd like to provide context to your answer.

The LNRS should help to direct funding into areas that will direct the greatest benefits for nature.

Some sites will be relevant to numerous potential measures and it is unclear how a user of the strategy will identify which potential measure should be selected for the greatest ecological benefit. It is important that the delivery of a particular measure does not negatively impact the delivery of an urgent recovery requirement for a priority species, for example. If a qualified ecologist is needed to make this decision, then the document should say so.

Dover District Council request that the LNRS team give more thought to a presentation which helps users of the LNRS to prioritise potential measures (and potentially overarching priorities). While the ACIB is not a decision-making tool, it should be able to give clear guidance on the more important measures for nature recovery as they relate to a particular site. This is needed so that the council/ land manager / developer etc can properly focus site assessments to understand the actual opportunities to implement a potential measure. This might include, for example, the extent to which the implementation of a measure can coexist with an existing /proposed land use.

Chapter 1 of Part 1 of the LNRS

It is important that the scope of the Strategy, and the limitations in respect of what it will and won't do once published, are fully understood by those using it and are also considered when commenting on the draft – this is set out in Chapter 1 of Part 1 of the LNRS. In summary the LNRS will:

- a) Not draw localised, detailed or definitive boundaries but will identify areas where action is likely to provide the greatest gains.
- b) Not dictate actions or mandate their implementation but will identify potential measures that could be taken to support the recovery of nature.
- c) Not 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 to grants, funding and investment.
- d) Not prevent development from happening but will inform future local plans biodiversity net gain.

Q8. Does Chapter 1 of Part 1 of the Strategy make clear how the LNRS will inform nature recovery and the limitations of its influence? Please select one option.

<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q8a. If you have answered 'Partially' or 'No', please tell us if you have any suggestions on how we could make it clear how the LNRS will inform nature recovery and the limitations of its influence.

It is appreciated that the authors have sought to make part 1 of the document accessible to all. It is important, however, that the LNRS is accompanied by a technical document, which explains how it should be used by land managers, ecologists, developers and planning professionals. Currently this information is in part 2 of the document but is hard to find and insufficiently detailed. This could include questions and answers. For example: If numerous measures are relevant to a particular site, how should the most beneficial measure for nature recovery be identified? How is the information in the LNRS applied to a site that is not on the Local Habitat Map?

If advice from a qualified ecologist should be sought, then the document needs to say so. Case studies examples would be helpful.

Appreciating that this is not within local control, there is a mismatch between clause (a) that there are no detailed or definitive boundaries, and the expected use of the local habitat map to inform BNG strategic significance. Does this give BNG practitioners scope to interpret the local habitat map boundaries or will the default be that the mapped boundaries are definitive, for the purpose of BNG?

Q9. Did you participate in any of the work to develop the LNRS? Please select one option.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q9a. If you have answered 'Yes', please tell us how you participated and how you found the experience in the box below.

Dover District Council was a supporting authority, various officers attended workshops and communication from the LNRS team outside of workshops was helpful and engaging.
--

Section C - The need for recovery of nature in Kent and Medway

Part 1 of the LNRS 'Setting the scene for nature recovery in Kent and Medway' provides information on the local context.

In this section of the questionnaire you can provide feedback on whether the Strategy sufficiently provides the context for the need for nature recovery and how this will be delivered. [You can answer all or as many of the questions as you like. If you would rather not provide feedback on a section or question, just move on to the next one.](#)

Chapter 2. Kent and Medway's Natural Landscape and Chapter 3. What makes Kent and Medway's nature so special

Chapter 2 (pages 12 to 34) provides a summary of the seven national character areas, an overview of the Kent Downs and High Weald National Landscapes and a summary of designated areas and sites.

Chapter 3 (pages 35 to 44) provides a summary of the habitats and species of Kent and Medway.

Q10. Does the LNRS sufficiently represent the significance of the county's landscape features, habitats and species? Please select **one** option.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	Partially
<input checked="" type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q10a. If you answered 'Partially' or 'No', please tell us what element of the county's natural features is not sufficiently recognised in Chapters 2 and 3.

If your comment is about a specific landscape feature, habitat or species, please make this clear in your answer.

Sect 2.1.2 North Kent Plain NCA - This section needs further detail on the importance of the Blean Complex, heath and the associated designations; and on the extent and importance of international coastal designations, reefs and associated protected species. This character area contains less information than the equivalent description of other national character areas, which contain detail about internationally important designations and rare species.

Chapter 4. A changing landscape (pages 45 to 75)

Q11. Does the LNRS sufficiently outline the trends of habitats and species change that the county has seen over the past decade? Please select **one** option.

<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Partially

<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q11a. If you answered 'Partially' or 'No', please tell us what changes the Strategy has failed to reference.

If your comment is about a specific trend, habitat or species, please make this clear in your answer.

The strategy should plan for a new land cover analysis, or at least a new habitat baseline from satellite imagery so that progress can be measured.

The table of broad habitats and 'percentage of total change' does not indicate whether the identified change relates to an increase or decrease in land coverage.

It would be a good idea to observe the declines in some well-known species (perhaps a garden bird species, a well-known flower, an easily recognized butterfly, or a well-known mammal / amphibian). These could be included in a third box titled 'declines' and are changes that Kent residents may have noticed.

4.4 Influences on Kent's habitats and species (pages 49 to 63) provides details on the pressures, challenges and threats impacting the county's natural environment and a summary of the things that need national focus if our efforts locally are to succeed.

The pressures are explored in the Strategy under the following headings:

- | | | |
|-------------------------------|---------------------------------------|--|
| • Climate Change | • Criminal activity | • Agricultural practices |
| • Pollution | • Wildlife removal | • Lack of appropriate land management |
| • Air pollution | • Disconnect with nature | • Game hunting |
| • Water demand and management | • Lack of knowledge and understanding | • Diseases and invasive and non-native species |
| • Human | • Built up areas | • Lack of funding and resources |

These pressures were identified by a wide range of people who attended Making Space for Nature workshops.

Q12. Has the LNRS identified all the key pressures, challenges and threats impacting on the county's natural environment? Please select one option.

<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q12a. If you answered ‘Partially’ or ‘No’, please tell us which key pressures, challenges or threats are missing.

If your comment is about a specific pressure, challenge or threat, please make this clear in your answer.

The key elements have been identified, but some minor amendments are suggested.

‘Criminal activity’ has already been changed to ‘criminal and antisocial activity’.

Amend ‘game hunting’ to ‘game hunting, game fishing and coarse fishing’. Fencing fishing lakes can impact the movement of species, including wildfowl. Other impacts include pollution (including lead weights, and overuse of bait), littering (including fishing tackle and nets) and habitat disturbance.

4.7 National Strategic context for the Kent and Medway LNRS (pages 72 to 74) provides details on the local strategic context between the LNRS and the county’s local plans, other relevant spatial plans, the national strategic context and other influences for the Strategy.

Q13. Are the links between the LNRS and the county’s local plans, strategies and the national targets and ambitions clear? Please select **one** option.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	Partially
<input checked="" type="checkbox"/>	No
<input type="checkbox"/>	Don’t know

Q13a. If you answered ‘Partially’ or ‘No’, please tell us how we could make the links clearer.

If your comment is about a specific plan, strategy, target or ambition, please make this clear in your answer.

No, the links are not clear. The strategy fails to recognize the importance of local strategies for the delivery of the LNRS. There are a large range of important local strategies produced by Local Authorities in Kent, such as Open Space Strategies, Pollinator Plans, Landscape Character Assessments, Climate Change Strategies, Air Quality strategies, Tree Strategies, species action plans, Strategic Access and Monitoring Strategies etc.

It is essential that Neighbourhood Plans are mentioned alongside Local Plans. They form part of the Development Plan.

Section D – The principles, ambitions, priorities and potential measures for nature recovery in Kent and Medway

Part 2 of the LNRS – Kent and Medway LNRS priorities, potential measure and areas that could become of importance for biodiversity

You can answer all or as many of the questions as you like. If you would rather not provide feedback on a question, just move on to the next one.

2.1 The overarching principles for nature recovery in Kent and Medway (page 9)

In order for the county's nature to respond and adapt to the increasing challenges of climate change, as well as the other pressures and challenges it faces, we need to ensure the LNRS for Kent and Medway is applying the principles of Lawton. We are building on these, reframing them slightly to provide a hierarchy for action and adding in two further principles to include the consideration of land management and land use, so that we can work with nature and use natural processes to tackle challenges our county faces.

. The principles are:

- **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.
- **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.
- **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.
- **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'.
- **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.
- **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.

Q14. How much do you agree or disagree with the adoption of these principles as the founding principles for delivering nature recovery in Kent and Medway? Please select one option per row.

Principles	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Better	X					
Bigger	X					
More	X					
Joined up	X					
Nature-based solutions	X					
Land management	X					

Q14a. If you would like to make any comments on the principles, please tell us in the box below.

If your comment is about a specific principle, please make this clear in your answer.

Dover District Council supports the overarching principles for nature recovery. Under 'nature-based solutions' reference should be made to environmental challenges as well as socio-economic challenges. Working with nature and the use of natural processes for mitigation of, and adaptation to climate change challenges (such as flood risk, drought) and air/water quality challenges, for example.

Chapter 3. Kent and Medway's Vision for Nature Recovery (pages 12 to 13)

The LNRS has ten ambitions for nature recovery, that our more detailed priorities and potential measures are structured around.

The first three of these expand further on the overarching principles, expressing the outcomes for connectivity, nature-based solutions and land management and land use. The fourth relates to the Strategy area's priority species and the remainder focus on broad habitat groupings and the aspirations we have for our grassland, successional, wooded, freshwater, urban and coastal ecosystems. The ten ambitions are:

1. **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.
2. **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.
3. **Land management and land use** – Land management and land use throughout Kent and Medway county not only meets the economic and social needs of the county, but also delivers nature recovery gains.
4. **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.
5. **Grasslands** – Our existing grasslands are conserved, with appropriate management returned to restore, connect and extend these habitats to deliver high quality, species-rich areas across the county.
6. **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.
7. **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.
8. **Freshwater** – Our freshwater habitats are clean, sufficient and stable, in a healthy and good ecological state that supports an abundance and diversity species. Catchments' functions are restored to deliver a connected mosaic of wet habitats, improving water quality and managing flood risk across the county.
9. **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.
10. **Coast** – Coastal and estuarine areas are allowed to evolve, with natural processes and progression restored, 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.

Q15. How much do you agree or disagree with the ten ambitions in the county’s vision for nature recovery? Please select **one** option per row.

Ambitions	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Connectivity	X					
Nature-based solutions	X					
Land management and land use	X					
Species	X					
Grasslands	X					
Successional habitats	X					
Woodland, trees and hedgerows	X					
Freshwater	X					
Urban	X					
Coast	X					

Q15a. If you would like to make any comments on the ambitions, please tell us in the box below.

If your comment is about a specific ambition, please make this clear in your answer.

In the ambition titled 'land management and land use', make it clear that nature recovery must occur alongside other land uses. Although in some cases land is identified for the primary purpose of nature conservation, nature recovery should be integral to land management generally. Even on intensively farmed land and highly managed areas such as recreation grounds, opportunities for nature recovery can be found.

Chapter 5. Connectivity priorities and potential measures (pages 22 to 29)

Q16. How much do you agree or disagree that the identified priorities and measures for 'Connectivity' will achieve the ambition to:

- see high quality habitats 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?

Please select **one** option.

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Tend to agree
<input checked="" type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Tend to disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	Don't know

Q16a. Please use the box below if you'd like to provide context to your answer.

If your comment is about a specific priority and/or measure, please make this clear in your answer.

Comment 1

Con 1.1: Improve functional connectivity corridors between the designated and protected sites of the Areas of Particular Importance for Biodiversity [4].

It is odd that Ancient Woodland is not included in the definition of APIB in references:

[4] Marine Conservation Zones, National Nature Reserves, Ramsar, Special Areas of Conservation, Special Protected Areas, Sites of Special Scientific Interest, Local Wildlife Sites and Local Nature Reserves.

Footnote 4 provides a different definition for the APIB to others in the document. All definitions for the APIB should be made consistent across the document.

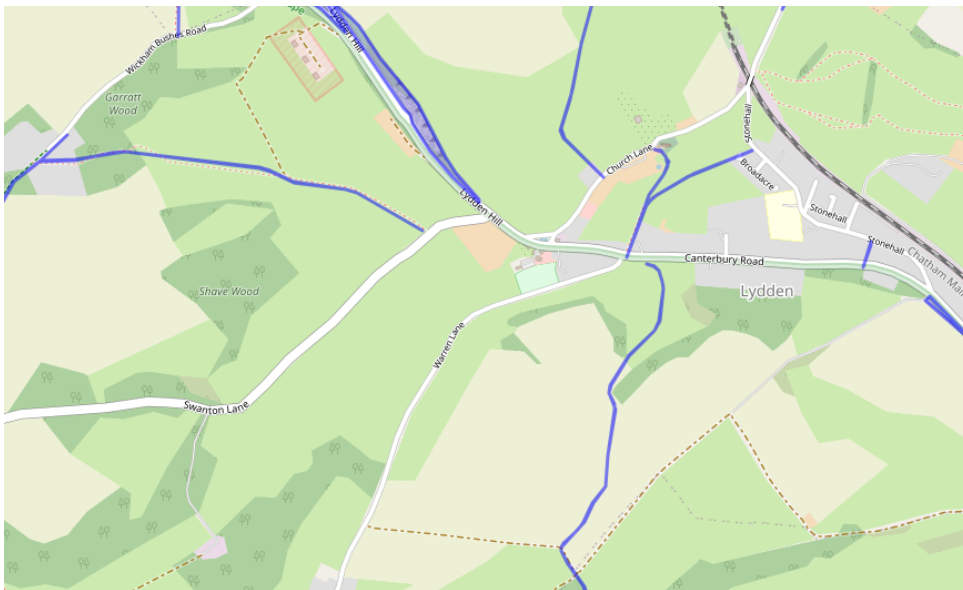
As currently written ancient woodland (and other irreplaceable habitats) are not included in this measure. The reason for this needs to be clear. If this is because there is an ancient woodland (etc) specific connectivity measure, this seems too complicated, and it would be better if this measure was not a subsection of APIB.

You would expect this particularly important measure to be included in the ACIB.

Comment 2

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.

Please see the extract below. Not all highways are included. The method (appendix 2.1a) states: 'all highways, PROW, cycle routes and roadside nature reserves'. Only strategic highways and PROW seem to have been included. This extent of highway inclusion needs to be clarified. We are concerned that that Rivers Trust data is the source of information used to identify Public Rights of Way. Please check the data sources are correctly referred to.



Comment 3

CON4.2 Implement broad buffer zones and connecting strips between significant habitat areas.

Ancient woodland and irreplaceable priority habitats are not included in the mapping. 'Significant' includes national/international designations, LWS, Woodland Trust / KWT/ RSPB reserves, LNR and country parks'. The rationale for this needs to be explained. It is confusing for there to be more than one definition of APIB and a third (and separate) definition of significant habitat areas.

Comment 4

None of the 'con' measures have been included in the ACIB. This needs to be explained more prominently. Connectivity is a key theme for local nature recovery. The introductory text explains that the majority of connectivity measures have been included in the relevant habitat-based measures – but even these are rarely included in the ACIB – See WTH5.4, 5.5 and 8.4 for example. The document needs to explain somewhere on the 'con' section which connectivity measures have been included in the ACIB. It does not appear that many connectivity measures have been included and this is a concern.

Chapter 6. Nature-based solutions, priorities and potential measures (pages 30 to 38)

Q17. How much do you agree or disagree that the identified priorities and measures for 'Nature-based solutions' will achieve the ambition of:

- **maximising our resilience to the challenges of climate change**
- **tackle health and societal inequality**
- **deliver well-being benefits, whilst simultaneously recovering nature?**

Please select **one** option.

<input type="checkbox"/>	Strongly agree
<input checked="" type="checkbox"/>	Tend to agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Tend to disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	Don't know

Q17a. Please use the box below if you'd like to provide context to your answer.

If your comment is about a specific priority and/or measure, please make this clear in your answer.

This section should make it clear which measures respond to flood risk, air pollution and water pollution. The priorities and measures listed only relate to carbon sequestration, and soil health / conservation. It might be that measures elsewhere in the document can be referred to (e.g. land management measures).

Q18. How much do you agree or disagree that the identified priorities and measures for 'Land management and land use' will achieve the ambition of delivering nature recovery gains alongside meeting the economic and social needs provided by this sector? Please select one option.

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Tend to agree
<input checked="" type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Tend to disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	Don't know

Q18a. Please use the box below if you'd like to provide context to your answer.

If your comment is about a specific priority and/or measure, please make this clear in your answer.

LM1.2 Identify key pieces of farmland that are strategically important for linking natural habitats

The following statement is made in the 'method' column of Appendix 2.1a: 'Adopted land allocation areas were removed as management would not be necessary within a development plan which has been approved.'. This should be reworded. While 'agricultural' land management may not be needed, the biodiversity resource / opportunities will still benefit from management. That management may be the same.

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.

The exclusion of land allocations from this objective is concerning. The priority relates to publicly accessible open spaces which will form part of new development.

It is not clear why the landcover data associated with this measure focuses on 'Arable and Horticultural and Improved Grassland'. This needs to be explained.

It is not clear why (or how) the 'indicator of invasive species abundance' has been used in conjunction with monads with a high richness of LNRS species abundance. Explain what a 'monad' is in the document.

Chapter 8. Species priorities and potential measures (pages 53 to 116)

The identification of the LNRS priority species followed a process determined by Natural England. This work was undertaken by the Kent and Medway Biological Records Centre, under the expert input and advice of the county species recorders and other experts. More detail on the selection process is provided in Part 2 Chapter 8. The experts advising on the selection are detailed in Appendix 1.3.

Q19. Given the process and those involved, how confident are you that the priority species identified are correct? Please select **one** option.

<input type="checkbox"/>	Very confident
<input checked="" type="checkbox"/>	Fairly confident
<input type="checkbox"/>	Neither confident nor unconfident
<input type="checkbox"/>	Fairly unconfident
<input type="checkbox"/>	Very unconfident
<input type="checkbox"/>	Don't know

Q20. How much do you agree or disagree that LNRS measures will halt the decline of, and aid the recovery, of priority species? Please select **one** option.

<input type="checkbox"/>	Strongly agree
<input checked="" type="checkbox"/>	Tend to agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Tend to disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	Don't know

Q21. Please add any comments you would like to make about the following in the box below:

- **the level of confidence you have with the identified priority species (Q19) and/or**
- **your level of agreement that the measures will halt the decline of, and aid the recovery of, our priority species (Q20)**

If your comment is about a specific species and/or measure, please make this clear in your answer.

No comments

Chapter 9. Grassland habitat priorities and potential measures (pages 117 to 132)

Q22. Are the right grassland habitats identified as priorities? Please select **one** option.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

If you have responded 'Partially' or 'No', you can tell us which grassland habitats are missing as priorities in Q24.

Q23 How much do you agree or disagree that the measures for each specific grassland habitat priority are appropriate? Please select **one** option per row.

Priority grouping	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Chalk grassland	X					
Coastal and floodplain grazing marsh	X					
Species-rich lowland meadow	X					
Acid grassland and heathland	X					
Arable wild plants	X					

Q24. Please add any comments you would like to make about the following in the box below:

- any grassland habitats that we have missed when identifying priorities (Q22) and/or
- the appropriateness of the measures for each specific grassland habitat priority (Q23)

If your comment is about a specific habitat and/or measure, please make this clear in your answer.

GL1.2 Increase the extent of high quality, connected chalk grassland by bringing appropriate sites, adjacent to core/good condition sites, into conservation management.

Adopted allocations are mentioned in in the data column of Appendix 2.1a. What relevance do 'allocations' have for this measure?

GL2.1 Increase opportunities to store winter water on land adjacent to grazing marsh to increase opportunities for "wetting" during spring/summer.

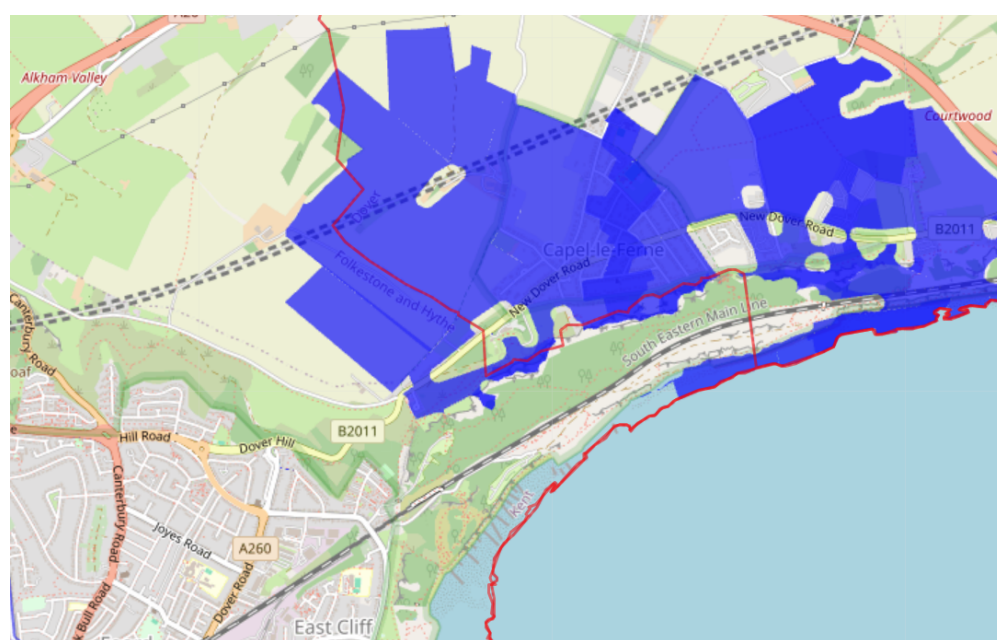
This measure is included in the ACIB. Why are some sites with potential (blue in the map below) excluded from the ACIB? Wherever possible the sites identified in this potential measure should be included in the ACIB. The example given below is at Wingham.



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 predation.

The measure needs some additional sense checking. The example below is at Capel Le Ferne and it seems very unlikely that there are any potential opportunities for grazing marsh in this locality. Please check the method and data and provide further explanation. In addition, urban landcover should be removed from the mapping of this potential measure.

Appendix 2.1a states that the mapping data associated with this measure informed the ACIB, but this does not seem to be the case (when viewing the ACIB against this measure).



Chapter 10. Successional habitat priorities and potential measures (pages 133 to 137)

Q25. Are the right types of successional habitats identified as priorities? Please select **one** option.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

If you have responded 'Partially' or 'No' you can tell us which successional habitats are missing as priorities in Q27.

Q26. How much do you agree or disagree that the measures for successional habitats are appropriate? Please select **one** option.

<input type="checkbox"/>	Strongly agree
<input checked="" type="checkbox"/>	Tend to agree
<input type="checkbox"/>	Neither agree nor disagree
<input type="checkbox"/>	Tend to disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	Don't know

Q27. Please add any comments you would like to make about the following in the box below:

- **any successional habitats that we have missed when identifying priorities (Q25) and/or**
- **the appropriateness of the measures for successional habitats (Q26)**

If your comment is about a specific habitat and/or measure, please make this clear in your answer.

Chapter 11. Woodland, trees and hedgerows priorities and potential measures (pages 138 to 161)

Q28. Are the right types of woodland, trees and hedgerows habitats identified as priorities? Please select **one** option.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	Partially
<input type="checkbox"/>	No

Don't know

If you have responded 'Partially' or 'No' you can tell us which woodland, trees and hedgerows habitats are missing as priorities in Q30.

Q29. How much do you agree or disagree that the measures for each specific woodland, trees and hedgerows priority are appropriate? Please select one option per row.

Priority grouping	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Existing woodland and trees	X					
Canopy cover	X					
Restoration of trees lost to disease, pests, climate change and drought	X					
Woodland resilience	X					
Ancient woodland	X					
Wet woodland	X					
Gill woodland	X					
Species rich hedgerows	X					
Traditional orchards	X					
Deer management						X

Q30. Please add any comments you would like to make about the following in the box below:

- any woodland, trees and hedgerows habitats that we have missed when identifying priorities (Q28) and/or
- the appropriateness of the measures for woodland, trees and hedgerows habitats (Q29)

If your comment is about a specific habitat and/or measure, please make this clear in your answer.

Connectivity measures **WTH 5.4 and 5.5** should inform the ACIB map.

Numerous woodland measures are informed by the England Woodland Creation sensitivity map (**WTH2.1, WTYH2.2, WTH2.3, WTH4.1, WTH4.3, WTH5.3** and others). While avoiding the best agricultural land is often appropriate given other objectives such as food security, that is not a measure informed by ecological objectives. It is, for example, appropriate to acknowledge the ecological benefit of connecting particularly important ancient woodlands, or critical bottle necks, even if the land is BMV agricultural land.

Economic judgements are not an overarching principle of the strategy for every other habitat type. The ACIB does not instruct implementation, it should illustrate where action would provide the greatest benefit. While BMV land has other economic and social benefits which may discourage its use for woodland, it is not appropriate for the LNRS to make economic (etc) decisions, particularly in the most important locations.

The Woodland Creation Offer is not only available on low sensitivity land. Although additional payments are available if the land most suitable for food production is avoided, this should not be relevant to the LNRS. The 'low sensitivity zones' suitable for woodland creation is not a measure of the land where woodland creation is most needed.

The [guide to sensitivity maps for woodland creation](#) states the following: *'Likewise, creation of new woodland, particularly of native woodland, may be appropriate outside 'low sensitivity' areas. We will determine the appropriateness of proposals in these areas. Where relevant, we will respond to the views of Natural England, Environment Agency, Historic England, the local authority and other stakeholders.'*

Another example is **WTH2.3 Plant more trees in hedgerows**. This measure is restricted to low sensitivity zones. Tree planting in hedgerows should be encouraged in all appropriate locations (based on ecological enhancement benefits) and not restricted to avoid BMV agricultural land.

Chapter 12. Freshwater habitat priorities and potential measures (pages 162 to 192)

Q31. Are the right freshwater habitats identified as priorities? Please select **one** option.

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

If you have responded 'Partially' or 'No' you can tell us which freshwater habitats are missing as priorities in Q33.

Q32. How much do you agree or disagree that the measures for each specific freshwater habitat priority are appropriate? Please select one option per row.

Priority grouping	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Restoration of rivers and streams to natural form	X					
Water quality of freshwater habitats	X					
Water supply and flows of freshwater habitats	X					
Buffer strips	X					
Headwater streams	X					
Chalk streams	X					
Clay rivers	X					
Ponds	X					
Lowland mire sites	X					
Natural reedbeds	X					
Freshwater wetlands	X					
Semi-natural lowland drains and associated marshlands	X					

Q33. Please add any comments you would like to make about the following in the box below:

- **any freshwater habitats that we have missed when identifying priorities (Q31) and/or**
- **the appropriateness of the measures for freshwater habitats (Q32)**

If your comment is about a specific habitat and/or measure, please make this clear in your answer.

The EA flood map for planning is being updated in March 2025. Please ensure this updated data is used in the mapping,

FW measures FW5.1(*safeguard headwater streams from agricultural pollution, erosion, and road runoff through the use of semi-natural buffer strips and interception features*) uses NE 2024 data titled 'Priority River Habitat – Headwater areas'. This does not appear to be very relevant to Kent, yet pollution from agriculture and road run-off must be relevant to the Dour, and other Kent rivers. It does not seem appropriate to restrict this measure to 'vulnerable soil types'.

The upper reaches of the Dour are currently classified as having 'bad' ecological status. The Dover Green Infrastructure strategy seeks to develop and Implement as River Dour Improvement Plan with the following potential project scope:

- guide investment into local priorities for protection and enhancement
- help shape how future funding for farming and land management such as the Environment Land Management schemes will be used
- map areas of opportunity for the use of 'nature-based solutions' to wider environmental problems like flooding, climate change mitigation and adaptation or poor water quality
- guide mandatory biodiversity net gain (BNG) investments
- provide a source of evidence for local planning authorities, helping to understand locations important for conserving and restoring biodiversity

Dover District Council believes that the range of priorities and measures are helpful. Clearly at the local scale the ACIB mapping may not be entirely reflective of potential habitats and measures. This is a good illustration of the need for the document to carefully explain the mapping constraints and the potential for detailed projects and plans to indicate different detailed boundaries / measures/ enhancements.

Measure FW6.4 is missing from the mapping, but has contributed to the ACIB according to Appendix 2.1a.

Chapter 13. Urban priorities and potential measures (pages 193 to 204)

Q34. Are the right areas of focus identified as priorities for urban areas? Please select one option.

Yes

<input type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

If you have responded 'Partially' or 'No' you can tell us which urban areas are missing as priorities in Q36.

Q35. How much do you agree or disagree that the measures for each specific urban priority area are appropriate? Please select one option per row.

Priority grouping	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Habitat fragmentation of urban environment	X					
Public greenspace and land management	X					
Nature based solutions in urban environments	X					

Q36. Please add any comments you would like to make about the following in the box below:

- any urban areas that we have missed when identifying priorities (Q34) and/or
- the appropriateness of the measures for urban areas (Q35)

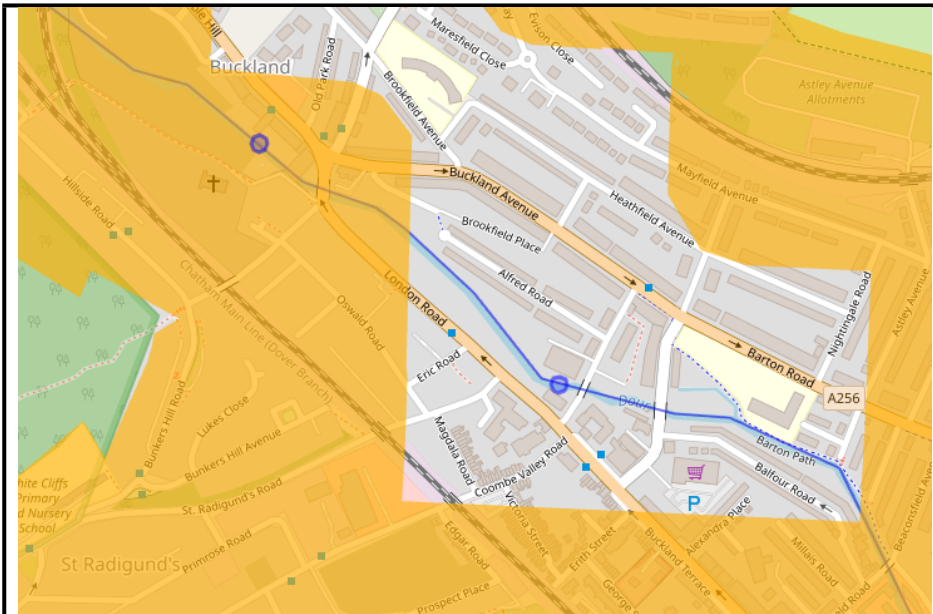
If your comment is about a specific urban area and/or measure, please make this clear in your answer.

URB1.2 Enhance and safeguard existing greenspace and trees that provide key stepping stones between larger natural spaces that are either within or at the edge of urban areas.

Dover Harbour should not be included in this measure?

URB1.4 Replace hard river banks with native buffer verges and tree planting and divert some river networks to form long, linear habitats for the benefit of wildlife.

Two sites (in the Dover Urban Area, on The Dour – (see map below) identified by EA with modifications that can be removed have been identified on the measures mapping, however only one is within the ACIB. Should both sites be included in the ACIB, as the combined ecological benefit of removing both modifications is presumably greater? Appendix 2.1a states that this data has contributed to the ACIB. URB2.3 and URB3.4 also have locations along the Dour that are dots outside of the ACIB.



URB2.1 Areas of urban greenspace [39] managed specifically for nature recovery, to provide a greater complexity of habitats, with year round shelter, forage and food, focussing on where benefits are most needed.

Not all urban greenspaces are included on the mapping of this measure, and the boundaries of the open spaces are in several cases, not accurate. To seek to resolve this Dover District Council has agreed with the LNRS development team that the council’s shape files for protected open spaces are included on the mapping. This should be in addition to OS Open Greenspace data. This is because not all urban greenspaces benefit from a Local Plan protected open space designation.

URB2.2 Employ conservation cuts, minimise mowing and leave wild strips, buffers and corners on verges and grass areas in areas known to be of importance for pollinators.

The mapping includes swathes of the urban area in Dover, not restricted to ‘Roadside nature reserves, all potential grassland habitats within bee lines, bee road sites and conservation verges’. This may be why we have very dense urban areas in Dover town inappropriately identified in the ACIB. At question 48a we request that high density urban areas from the ACIB map in Dover. The inclusion of these areas makes the ACIB harder to understand.

Chapter 14. Coastal priorities and potential measures (pages 205 to 226)

Q37. Are the right coastal habitats identified as priorities? Please select one option.

x	Yes
	Partially
	No
	Don't know

If you have responded 'Partially' or 'No' you can tell us which coastal habitats are missing as priorities in Q39.

Q38. How much do you agree or disagree that the measures for each specific coastal habitat priority are appropriate? Please select **one** option per row.

Priority grouping	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Estuary and open coast management	X					
Saltmarsh and mudflats	X					
Seagrass	X					
Chalk cliffs and reefs	X					
Native oyster beds	X					
Saline lagoons	X					
Vegetated shingle	X					
Coastal wildlife disturbance	X					

Q39. Please add any comments you would like to make about the following in the box below:

- any coastal habitats that we have missed when identifying priorities (Q37) and/or
- the appropriateness of the measures for coastal habitats (Q38)

If your comment is about a specific habitat and/or measure, please make this clear in your answer.

Please ensure that the Marine Management Organisation has been consulted in detail. The Marine Planning area (to which the Marine Plans apply) includes the land up to the mean high-water spring, and the tidal reaches of rivers.

Chapter 4. Understanding the priorities and potential measures (page 14) sets out how to use the Strategy to inform nature recovery actions.

Q40. Does this section of the LNRS provide enough detail for you to understand how to use the Strategy to inform your nature recovery action(s)? Please select **one** option.

<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q40a. If you have responded 'Partially' or 'No', please tell us the reason for your answer.

A detailed technical document (with case studies) is required to explain how to use the strategy to inform nature recovery to a particular site.

Section E - Kent and Medway LNRS mapping

The LNRS presents the local habitat map which illustrates the county's Areas of Particular Importance for Biodiversity (APIB) and Areas that Could become of Importance for Biodiversity (ACIB). The APIB contains sites considered to already be offered some form of protection through planning and the ACIB represents areas outside of this identified as where targeted action will enable us to deliver on the priorities laid out by the Strategy.

The mapping for the LNRS followed requirements set out by Defra. This work was undertaken by the Kent Wildlife Trust, under the expert input and advice of a data, evidence and mapping technical advisory group. The initial mapping was also reviewed and revised with partners and stakeholders before finalising as a draft for public consultation. More detail on the mapping process is provided in Part 2 Chapter 1. The experts advising on the mapping are detailed in Appendix 1.3.

Parts 1 and 2 of the draft Local Nature Recovery Strategy include some selected maps for illustrative purposes, but you are advised to use the online mapping platform in order to view all the available maps and look at these in detail. The maps available online include:

- Areas of Particular Importance for Biodiversity (APIB)
- Areas that Could become of Importance for Biodiversity (ACIB)
- Local habitat map (by selecting to view the APIB and ACIB map at same time)
- All mapped potential measures. By first selecting a measure and then selecting the ACIB layer, you can see where these measures fall within the priority area of the ACIB.

Also available via the mapping tool:

- Ability to view district boundaries
- Ability to view rivers
- Three options for the base map
- Attributes table, detailing for each mapped potential measure, the detailed action, the mapping methodology, and whether or not that potential measure was used to inform the ACIB mapping
- There are also full instructions of how to use the mapping tool.

The online mapping portal can be viewed at
https://webapps.kwtg.uk/lnrs_measures_webmap/

You can answer all or as many of the questions as you like. If you would rather not provide feedback on a question, just move on to the next one.

Chapter 1 of Part 2 of the LNRS provides an introduction to the mapping of the Strategy and sets out how it was developed.

Q41. From Chapter 1 of Part 2, are the purposes of the Strategy maps, and how they were devised clear? Please select **one** option.

<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q41a. If you have responded 'Partially' or 'No', please tell us how the mapping could be made clearer.

Comment 1

Currently, the Part 2 document explains that the ACIB does not indicate areas where development will be excluded. The new technical guidance document requested above should also explain that areas outside the ACIB do not indicate where development is acceptable. In particular the document should explain that there are biodiversity opportunities everywhere, that the ACIB is separate from protected species legislation, and that not every important habitat (including priority habitats) is included in the Local Habitat Map.

Comment 2

Prior to Supporting Authority pre-consultation it was agreed that adopted allocations in Local Plans would not be removed from the mapping. I note from the FAQs to that pre-consultation that it was also agreed that development sites with planning permission would also not be removed, but that *'it was agreed that where LPAs provide a GIS layers of such 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'*.

The approach is not clear.

- It is necessary for the LNRS to explain the approach that was taken in response to mapping where there are development consents;
- It is necessary for the LNRS to explain the approach that was taken in response to development allocations. It is not clear whether the approach previously discussed with LPA's has remained the same. For example, connectivity measures WTH8.4, 5.4, 5.5, GL3.3 state that adopted allocations are removed from the mapping. These are connectivity measures not included in the connectivity group because they are habitat specific. As such development consents / allocations should not necessarily be excluded from these connectivity measures.
- Typical text within Appendix 2.1 explanation of method states the following: *"Adopted land allocation areas were removed as management would not be necessary within a development*

plan which has been approved". DDC do not agree with this statement. Allocations have not been removed from mapping in the Dover District and habitat management within an allocation could be necessary. Areas of existing habitat are often retained within development allocation as part of open spaces / biodiversity enhancements. Often, the whole of a development allocation is not developed. It is requested that the text needs to be reworded.

- The methodology document needs to be reviewed on this matter.

The Strategy explains that not all the potential measures were mapped. It also notes that some of the mapped measures were not used to inform the Areas that Could become of Importance for Biodiversity (ACIB).

Q42. Does the information provided in the LNRS document and with the online maps make it clear which potential measures have been mapped and how they were mapped?

Please select **one** option.

<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q42a. If you have answered 'Partially' or 'No', please tell us how we could make it clearer.

It would be helpful if Appendix 2.1a provided more information on the constraints associated with data used. It needs to be clear that it is not always ideal data and should be treated with caution.

For example, the measure below relates to priority LM3 which is to '*Prevent agricultural diffuse pollution of freshwater habitats and groundwater bodies in farmland*'. It is not clear why this measure would only be indicated in flood zones. It would be useful to consider if this should be a more general measure.

If the presence of flood risk is important, why was surface water flood risk not mapped?

It is also necessary to explain why have adopted allocations been removed. If adopted allocation were removed, why were urban areas not removed? While DDC appreciates the effort to map as many measures as possible, it is important to set out the constraints of the data used in more detail.

LM3.1 Increased water capture, rainwater harvesting, reservoirs, ponds, holding areas, leaky wood dams.	Any arable or improved grassland that falls within the flood zone. Adopted land allocation areas were removed as management would not be necessary within a development plan which has been approved.	- CEH landcover: Arable and Horticulture and Improved grassland (CEH, 2024) - Flood Map for Planning (Environment Agency, 2018) - Adopted allocations (Kent Wildlife Trust, Kent Local Authorities data, 2024)
---	---	--

Q43. Does the information provided in the LNRS document and with the online maps make it clear which potential measures were used to inform the Areas that Could become of Importance for Biodiversity and how this map was created? Please select **one** option.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	Partially
<input checked="" type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q43a. If you have answered 'Partially' or 'No', please tell us how we could make it clearer.

While it is clear which measures were used to inform the ACIB, the mechanism for choosing the boundary of the ACIB is not clear. This needs to be explained in more detail.

In particular, DDC is concerned about connectivity measures. None of the CON measures were used to inform the ACIB. Habitat specific connectivity measures should have informed the ACIB, but it is not clear that this has been achieved.

The difference between measures **URB1.4** and **URB3.4** is not clear

URB2.4 Target tree establishment to areas of low canopy cover.

The method and data used for this measure need to be reviewed. Fairly few sites are identified and some of those that are identified are difficult to understand. Crabble Athletic Ground in Dover is identified by the measure (see map below). The explanation needs to be more detailed. Please note that some sites that are unrelated to an urban area are identified by this measure (e.g. land at Plucks Gutter).

DDC would like to review potential tree establishment areas with KCC before the final draft is published.



Q44. How much do you agree or disagree that the potential measures mapping identifies where we need to focus our action for nature recovery? Please select **one** option.

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Tend to agree
<input type="checkbox"/>	Neither agree nor disagree
<input checked="" type="checkbox"/>	Tend to disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	Don't know

Q44a. Please use the box below if you'd like to provide context to your answer.

If your comment is about a specific map, measure or area, please make this clear in your answer.

Priority (not irreplaceable) Habitats are not identified in the APIB, nor is their presence clear on the ACIB. What is to stop the LNRS identifying potential measures that are harmful to the priority habitat? In some cases, the action for nature recovery might best seek to improve the condition of priority habitats in the first instance.

DDC is concerned about connectivity measures. None of the CON measures were used to inform the ACIB. Habitat specific connectivity measures should have informed the ACIB, but it is not clear that this has been achieved. For example, WTH5.4 and WTH5.5 relating to connectivity of ancient woodland should have informed the ACIB.

Q45. Given the process and those involved, how confident are you that the mapping of potential measures and Areas that Could become of Importance for Biodiversity (ACIB) in Kent and Medway is correct? Please select one option.

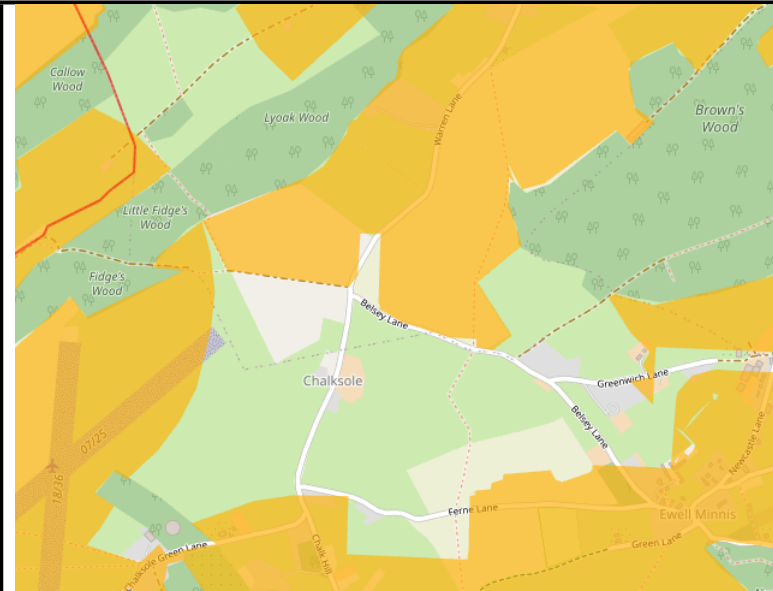
- | | |
|-------------------------------------|-----------------------------------|
| <input type="checkbox"/> | Very confident |
| <input type="checkbox"/> | Fairly confident |
| <input checked="" type="checkbox"/> | Neither confident nor unconfident |
| <input type="checkbox"/> | Fairly unconfident |
| <input type="checkbox"/> | Very unconfident |
| <input type="checkbox"/> | Don't know |

Q45a. Please use the box below if you'd like to provide context to your answer.

If your comment is about a specific map, measure or area, please make this clear in your answer.

Please include Chalksole Farm habitat bank (Dover District) - It is providing units in the following habitats: neutral grassland, lowland meadow, individual trees, ponds, broadleaved woodland, lowland calcareous grassland and mixed scrub. A small part of the habitat bank is not included in the ACIB. The council has provided shapefiles.





Careful on-site assessment confirms the suitability of the site for the proposed habitats.

Q46. How much do you agree or disagree that the mapped Areas that Could become of Importance for Biodiversity (ACIB) suitably focuses where action should be prioritised? Please select **one** option.

<input type="checkbox"/>	Strongly agree
<input type="checkbox"/>	Tend to agree
<input type="checkbox"/>	Neither agree nor disagree
<input checked="" type="checkbox"/>	Tend to disagree
<input type="checkbox"/>	Strongly disagree
<input type="checkbox"/>	Don't know

Q46a. Please use the box below if you'd like to provide context to your answer.

If your comment is about a specific map, measure or area, please make this clear in your answer.

Dover District Council is concerned about the treatment of 'other' priority habitats (not irreplaceable priority habitats) within the mapping. Priority habitats are not within the APIB, nor are they necessarily within the ACIB.

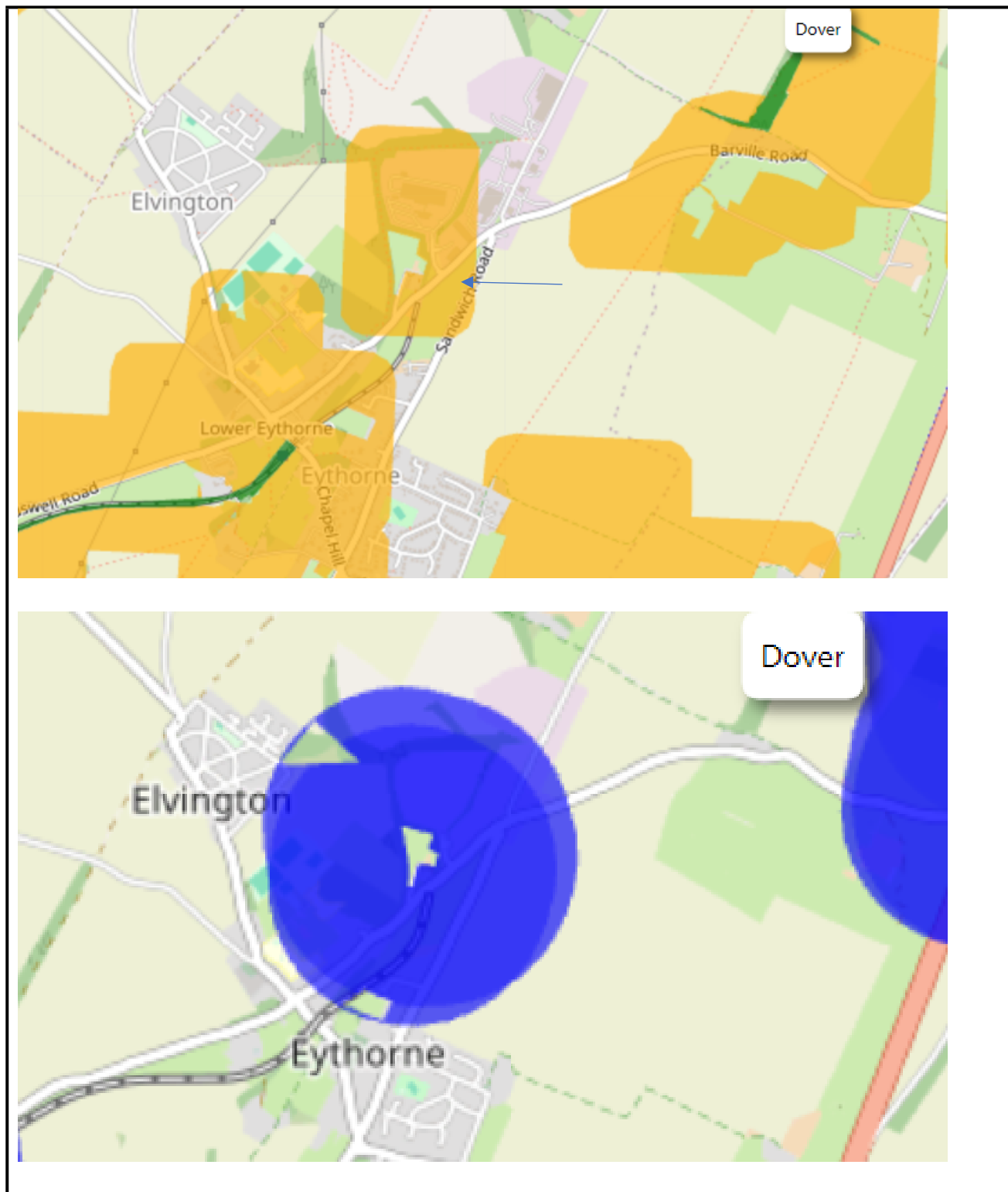
Within the local habitat map the priority habitats (KHS 2012) are often surrounded by the ACIB notation.

The green shape in the centre of the map below is a lowland calcareous grassland priority habitat (identified in KHS 2012). Potential measure GL1.1. seeks to maintain and enhance the habitat. This measure is not included in the ACIB, but as you can see below, the land surrounding it is (covered by GL1.2 connectivity measure).

This arrangement is not adequate because it will not make sense to many users of the mapping. Not everyone will know where to look for data, even if they know the gap in the information exists.

DDC suggests that the mapping should include a layer to show the location and type of other priority habitat. The ACIB map will make more sense when this data is available. Currently when both the ACIB and APIB are both 'switched on' the resultant Local Habitat Map has gaps which are difficult to understand. These are often priority habitats that do not fall into the 'irreplaceable' category and it is not clear how it can be concluded that areas of priority habitat do not require LNRS measures

If necessary the priority habitat layer could be accompanied with a note stating that the condition of the habitat is unknown.



The map showing Areas of Particular Importance for Biodiversity (APIB) was prepared under strict Defra guidelines and using the most up to date available data in respect of national conservation sites, Local Nature Reserves, Local Wildlife Sites and irreplaceable habitats. Therefore, we are not asking for feedback on the APIB map.

Q47. However, if you believe there are any errors in the mapping of these specific sites, please detail in the box below.

Section 4.3 (page 18) of Part 2 of the Strategy outlines how the potential measures and their associated mapping should be used, alongside the “Areas that Could become of Importance for Biodiversity” map to inform nature recovery. The user guide to the online mapping tool explains how you can use the maps to determine the best action for nature on the land you’re interested in.

Q48. In reference to the LNRS document and the user guide, do you understand how you would use the LNRS maps to inform action for nature recovery? Please select one option.

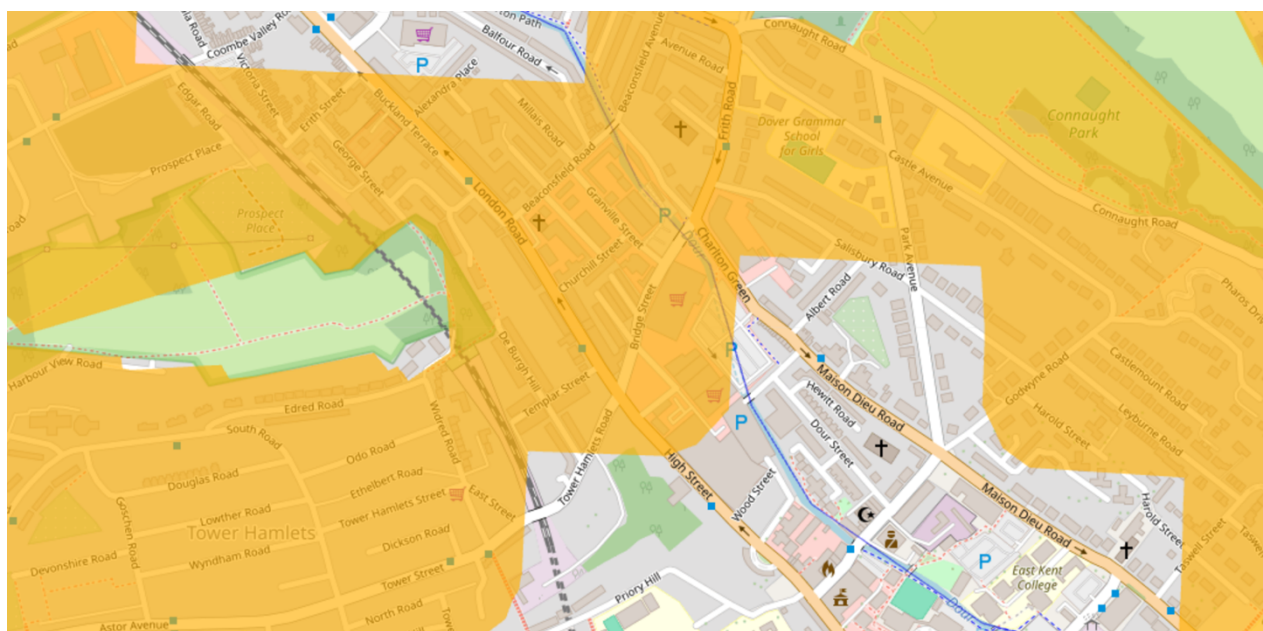
<input type="checkbox"/>	Yes
<input checked="" type="checkbox"/>	Partially
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

Q48a. If you have answered ‘Partially’ or ‘No’, please tell us the reason for your answer.

If your comment is about a specific map, please make that clear in your answer.

Please see previous comments.

Please omit the high-density urban areas from the ACIB map in Dover. The inclusion of these areas makes the ACIB harder to understand. The example below is parts of Dover Town Centre.



Section F - Anything else you would like to tell us about the LNRS

Q49. If there is anything else you would like to tell us about the draft LNRS including the appendices, please tell us in the box below.

If your suggestion is about a specific part, section and/or page, please make this clear in your answer.

It would be helpful if the mapping layers were in the same order as in the document.

The mapping should carry 'information' (on opened layers). When a user clicks on a site, a 'pop-up' should indicate whether a designated or priority habitat has been identified, identify the habitat type and the name of the designation (if relevant) and the 'measures' potentially relevant to the site.

The measurement tool should measure in metres, rather than ft.