

Draft Worcestershire
Local Nature
Recovery Strategy
(LNRS) Consultation
Outcome Report



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1. Process of preparing Worcestershire's Local Nature Recovery Strategy

1.1 Responsibility for LNRS preparation

Worcestershire County Council was appointed on 26th June 2023 as the Responsible Authority for preparation of the Worcestershire Local Nature Recovery Strategy (LNRS). This gave the Council legal responsibility for preparing, publishing, reviewing and republishing a Local Nature Recovery Strategy.

The process for doing this is set out in [The Environment \(Local Nature Recovery Strategies\) \(Procedure\) Regulations 2023](#) (the regulations).

The content required to be included within a Local Nature Recovery Strategy is set out in the [LNRS Statutory Guidance](#).

1.2 Supporting Authorities

The regulations set out a particular role for Supporting Authorities in the LNRS process. Within Worcestershire, the Supporting Authorities are:

-  **Bromsgrove District Council**
www.bromsgrove.gov.uk
-  **Redditch Borough Council**
Working together for our communities
-  **Malvern Hills District Council**

-  **Worcester City Council**
-  **Wyre Forest District Council**
-  **Wychavon District Council**
good services, good value
-  **Natural England**

Responsible Authorities are required to take reasonable steps to involve all Supporting Authorities in preparation of the LNRS. In Worcestershire, this included inviting Supporting Authority representatives to:

- Take up places on the LNRS Steering Group and Task & Finish Groups
- Contribute to the production of the Worcestershire State of Nature Report 2023
- Comment on the draft content of documentation for the LNRS Issues and Options Consultation
- Attend workshops to finalise the list of draft Biodiversity Priorities
- Attend workshops to discuss the development and mapping of draft Potential Measures

1.3 Steering Group and Task & Finish Groups

Twenty-four organisations were members of either the LNRS Steering Group and/or one of the eight Task & Finish Groups which supported the LNRS preparation process.

The Steering Group commenced regular meetings in November 2022. The role of the Steering Group, set out in Terms of Reference, was:

- ❁ To agree a shared understanding of the purpose of the LNRS.
- ❁ To help scope the process/stages and strategic direction required for LNRS production.
- ❁ To provide advice including on setting vision, aims and objectives,
- ❁ To collaborate in communications and engagement and to help identify the available relevant evidence, capacity and skills needed to prepare LNRS.
- ❁ To bring and share their knowledge and experience and that of their respective organisations and wider sectors of which they are part.
- ❁ To advise on how the LNRS can add value and links to work elsewhere in the county as relates to nature recovery.
- ❁ To act as ambassadors for the LNRS within their respective organisations and wider sectors.
- ❁ To support the dissemination of information to groups identified with whom the LNRS would benefit from engaging.
- ❁ To enter into the spirit of the LNRS for the wider benefits to society, give adequate time and energy to discussions and act with integrity, avoiding or declaring any personal conflicts of interest.

Four Task & Finish Groups were operational between January and December 2023 to:

- ❁ Prepare a Stakeholder Engagement Plan
- ❁ Prepare a Worcestershire State of Nature Report
- ❁ Consider data requirements for the draft Local Habitat Map
- ❁ Prepare documents for the Issues and Options Consultation

Four Task & Finish Groups were operational between May 2024 and February 2025 to:

- ❁ Prepare the final list of draft Biodiversity Priorities
- ❁ Collate and analyse species data
- ❁ Prepare a table of suggested draft Potential Measures
- ❁ Prepare the draft Local Habitat Map

1.4 Issues and Options Consultation

The LNRS Issues and Options Consultation was live between 15th January and 10th March 2024. The purpose of the consultation was to set out the scope, content and purpose of a Local Nature Recovery Strategy as required by the legislation and statutory guidance, and to invite specific feedback on:

- ❁ A draft vision and headline principles for preparation of the LNRS
- ❁ The main threats and pressures facing nature in Worcestershire
- ❁ The opportunities that exist to recover nature in Worcestershire
- ❁ Nature recovery sites and projects that could be included on the Local Habitat Map
- ❁ Local habitat and species priorities for nature's recovery

The Issues and Options Consultation had 189 individual responses including via letter, email, Snap Survey questionnaire or data submission via the draft Local Habitat Map. How these responses subsequently informed the preparation of the draft LNRS is set out in the following documents within the draft [LNRS supporting evidence base](#):

- ❁ Creating the list of proposed Biodiversity Priorities
- ❁ Opportunities for Recovering or Enhancing Nature – stakeholder input

1.5 Stakeholder engagement

The preparation of the draft LNRS was a collaborative process guided by the principles of transparency, inclusivity and clear communication. A stakeholder engagement plan identified the objectives and key audiences for the LNRS preparation period.

Stakeholder engagement carried out during preparation of the draft LNRS included:

❁ **Focused workshops.** Examples include:

- a) Mapping workshop with Severn Trent staff.
- b) Priorities and opportunities workshop with Worcestershire Wildlife Trust's Farmer Facilitation Group.
- c) Nature recovery workshop for Worcester Community Builders and community group leads.

❁ **Webinars.** Examples include:

- a) An introduction to LNRS for Parish Councils, delivered in partnership with the Worcestershire County Association of Local Councils (CALC).
- b) An introduction to the role of LNRS in planning policy and planning decision-making, delivered to Worcestershire planning policy and development officers.

❁ **Nature-Friendly Farming Conference** delivered in partnership with the National Farmers Union (NFU).

- ❁ Talks to local interest groups. Examples include:
 - a) Teme Valley Wildlife Group.
 - b) Worcestershire Wildlife Trust Malvern Local Group.
- ❁ Presentations on LNRS preparation progress. Examples include:
 - a) NFU meetings.
 - b) Country Land and Business Association (CLA) meetings.
 - c) Local Access Forum meetings.
 - d) Worcestershire Local Nature Partnership meetings.
- ❁ Social media and videos. Examples include:
 - a) Posts on Worcestershire County Council Facebook, LinkedIn and X accounts.
 - b) Two short films aimed at landowners and community groups.
- ❁ Publication of guidance notes. Examples include:
 - a) LNRS Quick Guide.
 - b) Written and video guidance on taking part in the public consultation, including bespoke advice produced for landowners and managers, for public authorities, and for those with an interest in 'Biodiversity Net Gain'.

Visit the Worcestershire County Council LNRS webpages to view the [Stakeholder Engagement Report](#).

1.6 Pre-consultation with Supporting Authorities

By law, Supporting Authorities may review the draft LNRS prior to public consultation and have the opportunity to raise an objection. Supporting Authorities were given 28 days to review the draft LNRS. This period of notice ended on 21st July 2025.

As part of this pre-consultation process Worcestershire County Council attended a panel meeting with the Defra Arm's-Length Bodies (Natural England, Environment Agency and Forestry Commission). The panel made five key recommendations for Worcestershire County Council to address prior to public consultation:

- ❁ Reduce the total coverage of mapped Potential Measures through further targeting.
- ❁ Develop the use of the Wider Environmental Benefits as a mechanism for prioritising mapped Potential Measures.
- ❁ Thread the wording and use of the Wider Environmental Benefits terminology more cohesively through the written strategy.
- ❁ Consolidate the tables of Biodiversity Priorities, Potential Measures and Wider Environmental Benefits into one location.
- ❁ Provide more information on stakeholder engagement within the written strategy.

The comments returned by all Supporting Authorities as part of this pre-consultation process, and Worcestershire County Council's response, are detailed in **Appendix 1**.

All the Supporting Authorities were content for the draft LNRS to proceed to public consultation.

1.7 Public consultation

The public consultation on the draft Worcestershire LNRS opened on 6th August 2025 and closed on 26th September 2025.

Stakeholders were given four ways to provide a response to the consultation, with all comments received treated equally and given the same consideration regardless of the method of submission:

Method 1: Completing an online questionnaire using the Snap Survey platform

Method 2: Completing an additional questionnaire using the Snap Survey platform to comment more specifically on the wording of individual Potential Measures

Method 3: Using an ArcGIS Survey123 form embedded within the draft Local Habitat Map webtool to comment on Potential Measures mapped to specific land parcels

Method 4: Contacting the LNRS preparation team by letter, email or telephone

Comments were invited on:

- ❁ The content and accuracy of Worcestershire’s draft Statement of Biodiversity Priorities. This is the section of the LNRS that sets out the current state of nature in Worcestershire, the threats and pressures on nature, the wider environmental benefits that can be achieved through nature recovery, and the main opportunities that exist for recovering nature.
- ❁ The draft list of Biodiversity Priorities for Worcestershire.
- ❁ The draft habitat and species Potential Measures.
- ❁ Worcestershire’s draft Local Habitat Map. Comments were specifically invited on whether the right Potential Measures had been mapped in the right locations, and if the correct Wider Environmental Benefits (WEBs) had been identified for each Potential Measure.

Accompanying the consultation was an extensive evidence base to help people understand how the draft Biodiversity Priorities and draft Potential Measures had been developed. These resources remain available:

- ❁ [State of Nature Storymap Collection](#)
- ❁ [Habitat Potential Measures Storymap Collection](#)
- ❁ [Species Potential Measures Storymap Collection](#)
- ❁ [Worcestershire LNRS evidence base](#)
- ❁ [LNRS Glossary of Terms](#)

A series of six guidance notes were published to help different audiences engage with and respond to the consultation. The guidance notes were:

- ❁ Nature recovery for owners and managers of farmland
- ❁ Nature recovery on sites already of importance for biodiversity
- ❁ Nature recovery on land owned by public or statutory bodies and non-farming businesses such as forestry, road and rail corridors, industrial and retail parks, the National Health Service estate or His Majesty’s Prison estate
- ❁ Nature recovery within communities or in schools
- ❁ Nature recovery at home and in gardens
- ❁ Nature recovery through Biodiversity Net Gain

2. Report on the draft Local Nature Recovery Strategy Public Consultation

Publicising the consultation

The consultation was promoted to Worcestershire residents and stakeholders in the following ways:

- ✿ A mailing to 297 consultees registered on Worcestershire County Council's Planning Consultation Database
- ✿ Advertisements in the five main print newspapers covering the county
- ✿ Posts on Worcestershire County Council social media (Facebook, LinkedIn and X) which had a total reach of 95,600 views and almost 600 click-throughs to the LNRS webpages
- ✿ Direct emails to partners and key stakeholders who had been engaged with the draft LNRS preparation
- ✿ Promotion by partner organisations in their own newsletters or on social media.

Additional engagement can be inferred through:

- ✿ 144 individual views of the draft Local Habitat Map video tutorial on YouTube during the consultation period
- ✿ Approximately 2,700 views of the 75 Potential Measure Storymaps during the consultation period

Responses received to the consultation:

Method 1: 101 main consultation questionnaires submitted

Method 2: 16 questionnaires submitted on the wording of Potential Measures

Method 3: 35 questionnaires submitted on the mapping of Potential Measures

Method 4: 48 letters and emails were received. These contained 615 unique comments: **181** comments from the LNRS Supporting Authorities, and **434** comments from other key partners, stakeholders and the public.

The 181 comments received from LNRS Supporting Authorities, and Worcestershire County Council's responses, are reproduced in full in **Appendix 1**.

The 434 comments received via letter and email from other key partners, stakeholders and members of the public, and Worcestershire County Council's responses, are reproduced in full in **Appendix 2**.

All comments were carefully considered regardless of the method of submission, and this report sets out how the Final LNRS has been shaped by all the comments received. In reproducing consultation responses, information identifiable to an individual, a group or business interest has, as far as reasonably possible, been redacted.

2.1 Who took part in the consultation and why

Consultation response method 1 collected information about respondents and their current level of understanding and engagement with nature recovery and the LNRS.

Q1: Which of the following best describes you in terms of your response to this consultation?

Types of Respondents	Number	%
Interested local resident	50	49.5
Local Councillor (Parish/Town/City/District/County)	12	11.9
Local environmental/wildlife group/organisation	13	12.9
Landowner/farmer	10	9.9
Other	5	5
Statutory agency or public body	4	4
National environmental/wildlife group/organisation	4	4
Land agent or farm advisor	2	2
Tenant farmer	1	1
Developer or agent acting for a developer	0	0
School/college/university staff or student	0	0

Respondents stating 'Other' said:

- 🌿 National Landscape Team
- 🌿 Local Government Authority
- 🌿 Parish Council
- 🌿 Bothered about loss of wildlife and habitats
- 🌿 Retired Ecologist and Conservation Officer

Q2: What will you mainly use the LNRS for once it is published?

Future use for LNRS	Number	%
When considering or making comments on planning matters e.g. planning applications or local development documents	25	24.8
Advice on making your home/garden more nature friendly	18	17.8
Don't know yet	15	14.9
When planning a nature recovery project in your local community	13	12.9
Land management decision making e.g. for advice on delivering nature recovery alongside farming	12	11.9
Other	7	6.9
As an evidence base e.g. for grant applications or research	5	5
To support delivery of Biodiversity Net Gain e.g. when seeking to buy/sell Biodiversity Credits, calculate Biodiversity Units or masterplan development site layouts	3	3
Don't plan to use it	2	2
Teaching purposes e.g. within school curriculum or higher education module	1	1

Respondents stating 'Other' said:

- ❁ No comment now but to be determined later
- ❁ Pursuing an improvement of Rivers Severn and Stour as an individual and through CARP (Communities Against River Pollution). Other nature conservation initiatives.
- ❁ When deciding where to focus river monitoring
- ❁ All of the above - via Neighbourhood Plan
- ❁ As a neighbouring authority, under a different LNRS, we would wish to monitor and compare the usage of both strategies.
- ❁ A collection of land management decisions, BNG and grant applications.
- ❁ The use to our farm totally depends on its quality, relevance and the part it plays in government strategy

Q3: Have you been involved in preparation of the draft LNRS?

Involvement of respondents in preparation of LNRS	Number	%
No	71	70.3
Attended a meeting/workshop	14	13.9
Responded to previous public consultation	8	7.9
Other	6	5.9
Member of steering group/a task and finish group	5	5

Respondents stating 'Other' said:

- ✿ Suggested pieces of neglected RBC owned land to become listed etc.
- ✿ Submitted responses to issues and options and data
- ✿ Provided feedback re farmer friendly engagement sections of guidance
- ✿ I have not personally been involved but one of our governors has been a member of the steering group representing ***redacted text***
- ✿ Have been speaking to [LNRS team] about Nightingale conservation in Worcestershire
- ✿ Contributing to the priority list (long list/short list) of vascular plants

Q4: Where do you live?

Location of respondents	Number	%
Wychavon district	26	25.7
Worcester city	19	18.8
Malvern Hills district	18	17.8
Wyre Forest district	14	13.9
Bromsgrove district	12	11.9
Other	7	6.9
Redditch borough	3	3
Gloucestershire	1	1
Shropshire	1	1
Herefordshire	0	0
Warwickshire	0	0
Birmingham	0	0
Staffordshire	0	0

Respondents stating 'Other' said:

- ✿ ***redacted text*** rent a land holding for a Habitat Bank in ***redacted text***, with more habitat banks in the pipeline around the county
- ✿ Stirling
- ✿ Wiltshire
- ✿ Stourbridge
- ✿ Dudley
- ✿ This response is from ***redacted text*** on behalf of ***redacted text***
- ✿ London

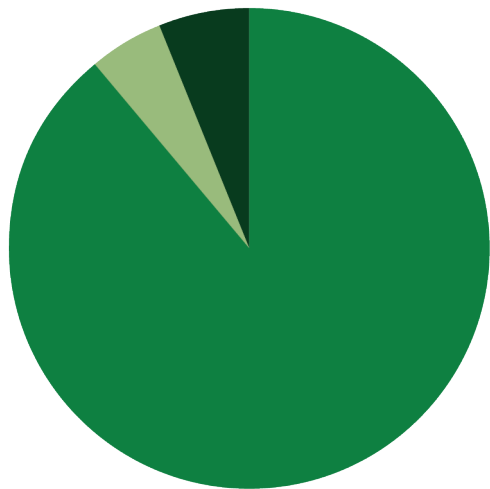
Q5: How did you hear about this consultation?



Mechanism for hearing about consultation	Number	%
Directly from Worcestershire County Council e.g. email from LNRS officers or a mailing from the Planning Consultation Database	37	36.6
Email, newsletter or social media of an organisation I am a member of	20	19.8
Worcestershire County Council website or social media	19	18.8
Other	17	16.8
At an event attended by LNRS officers	5	5
Local newspaper story (print, website or social media)	3	3

Respondents stating 'Other' said:

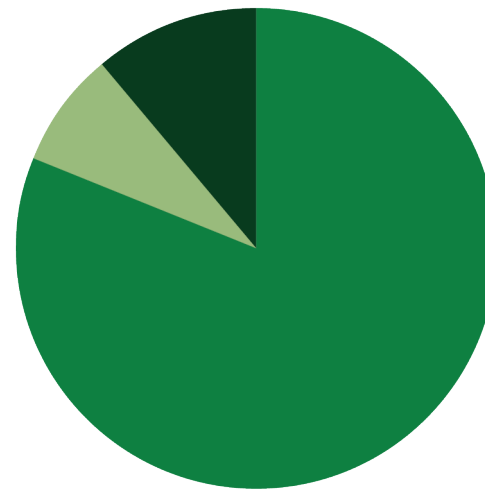
- ✿ Local green party councillor
- ✿ CLA
- ✿ Worcestershire Wildlife Trust [x 3 respondents]
- ✿ Environment Agency local staff
- ✿ Natural England Nature Recovery Basecamp
- ✿ Made aware by a friend
- ✿ Word of mouth [x 2 respondents]
- ✿ NFU
- ✿ NE Worcestershire Placemaking call
- ✿ Facebook nature group
- ✿ I was consulted by the County's LNRS Lead as a professional botanist with a longstanding knowledge of the County's flora
- ✿ Bewdley Town Council - I am a councillor
- ✿ Social media from local Councillor
- ✿ From Officers at Wychavon District Council




Q6: Do you agree that the strategy helps you to understand what nature recovery is?



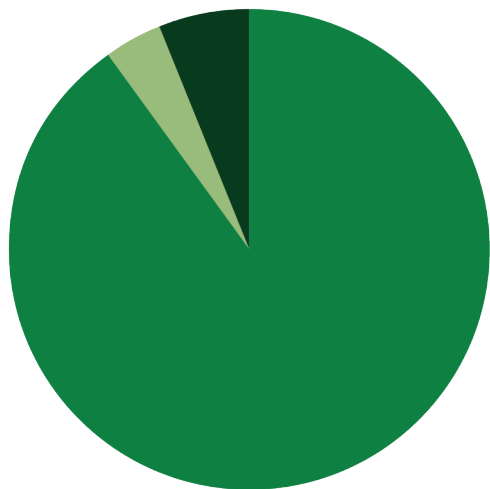
	Yes:	90	(89.1%)
	No:	5	(5%)
	Don't Know:	6	(5.9%)


Q8: Do you agree that the strategy identifies and celebrates the landscapes, habitats and species found within, and which are special to Worcestershire?



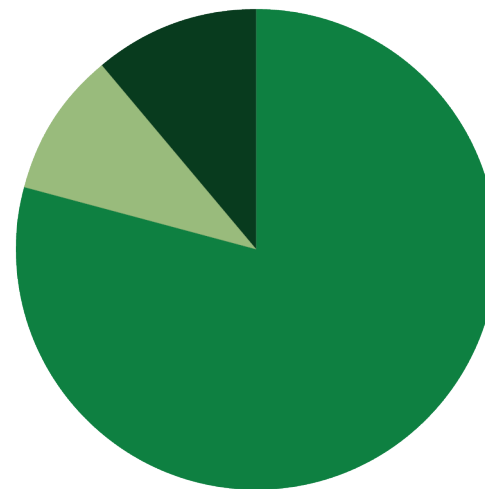
	Yes:	82	(81.2%)
	No:	8	(7.9%)
	Don't Know:	11	(10.9%)




Q7: Do you agree that the strategy helps you to understand what a Local Nature Recovery Strategy is for?



	Yes:	91	(90.1%)
	No:	4	(4%)
	Don't Know:	6	(5.9%)

Q9: Do you agree that the strategy correctly identifies the challenges facing nature and the urgent need to take action for nature in Worcestershire?



	Yes:	80	(79.2%)
	No:	10	(9.9%)
	Don't Know:	11	(10.9%)

Respondents who answered 'no' or 'don't know' to questions 6, 7, 8 or 9 were asked to provide further information.



Key themes identified within comments given by respondents who answered 'no' or 'don't know' to questions 6, 7, 8 or 9.

Theme	Our response
<p>Public engagement</p> <p>Engagement with the public was fundamental to a more widespread understanding of the state of nature and the purpose of the LNRS. More face-to-face communication, clear messaging and educational content is needed that makes it easy for people to understand and participate in the delivery of nature recovery.</p>	<p>This will be taken on board and actioned as LNRS moves into delivery phase and a new stakeholder engagement plan is developed.</p>
<p>Protecting nature from destruction</p> <p>Concern that the urgent need to take action for nature was often overridden within decision making processes in favour of development. Badly planned or delivered development has already done significant damage to Worcestershire's landscape and habitats and there is frustration that local planning authorities and developers do not give sufficient weight to the protection of nature within the planning and development management processes. Greater emphasis should be put on achieving better outcomes for nature in the delivery of the Worcestershire Parkway development.</p>	<p>This concern is noted. Respondents should be aware that proposed changes to planning law within the Levelling Up and Regeneration Act will require all Local Planning Authorities to 'take account' of the LNRS when preparing local plans and other spatial strategies and consider the appropriate level of safeguarding to apply to individual sites. All of Worcestershire's Local Planning Authorities have been engaged in the preparation of the LNRS.</p>
<p>Coverage of mapped Potential Measures</p> <p>Concern that many smaller woodlands, grasslands, wetlands and local greenspaces were not included within the mapped Potential Measures on the Local Habitat Map. This was a missed opportunity to fully recognise the value of these sites and protect them from potential future threats.</p>	<p>The mapping of Potential Measures was constrained by guidance given by Defra and Natural England on the total coverage of mapped measures that should be included within the Local Habitat Map. Mapped Potential Measures have been targeted to those locations where the best outcomes can be achieved for nature. This does not mean that action cannot be taken in other locations, or that action in other locations would not achieve good outcomes for nature. The LNRS suggests a number of unmapped Potential Measures that will be beneficial for nature anywhere in Worcestershire.</p> <p>All Potential Measures have an accompanying Storymap which details how that measure was developed and, if relevant, how the mapping was targeted. See:</p> <p>Habitat Potential Measures Storymap Collection</p> <p>Species Potential Measures Storymap Collection</p>

Theme	Our response
<p>Delivery of the LNRS</p> <p>Would preparation of the strategy be followed up with action, with particular reference to Worcestershire County Council and the district planning authorities. Would consultation comments be listened to and would meaningful action take place on the ground.</p>	<p>This concern is noted. LNRS is different to previous biodiversity plans and strategies as it has a legal mandate for delivery and comes with a requirement to monitor, review and report on action taken. Partners in Worcestershire have a long and successful track record in working together to restore nature, such as the Natural Networks Partnership run as a joint initiative by Worcestershire Wildlife Trust and Worcestershire County Council, which has already drawn down over £900,000 for ecological enhancement of public open spaces in rural and urban areas in Worcestershire. Achieving the recovery of nature will require a step-change in the way we operate as a local partnership, including working with more landowners over larger areas. The LNRS is intended to be a tool to prioritise action, focus effort and lever in funding for delivery.</p> <p>Defra have committed to providing guidance on the scope of the LNRS delivery role that Responsible Authorities will be required to undertake, and the extent of financial support that will be associated with that delivery role.</p>
<p>Threats to nature</p> <p>The strategy did not adequately consider the threat of litter and plastic pollution to the natural environment, especially watercourses.</p>	<p>This subject is already included within Section 2.4 Threats and pressures facing our natural environment, which highlights the threat of pollution including flytipping and microplastics. The text has been amended to also refer to littering. Text has been added to the LNRS within Section 3.3 Wider environmental benefits of nature recovery, to highlight the urgency of addressing the threat of plastic, particularly microplastic, pollution to water quality and soil health.</p>
<p>Contribution of Public Rights of Way</p> <p>England's designated National Trails network, and Public Rights of Way more widely, can contribute to nature recovery, and the strategy should include more recognition of this, as well as identifying the Cotswolds Way on the Local Habitat Map.</p>	<p>It is outside of the scope (and coverage requirements) of the LNRS to map the Public Rights of Way network in this way.</p> <p>Text has been added to Section 3.3 Wider environmental benefits of nature recovery, to highlight the contribution of the PROW network to nature recovery and providing access to nature and landscapes.</p>

Theme	Our response
Timeframe for review and republication of the LNRS There should be the ability to update the Local Habitat Map more frequently in-between LNRS reviews.	Once the LNRS is published the LNRS Regulations prevent the Local Habitat Map being altered unless and until the Secretary of State for the Environment, Farming and Rural Affairs authorises a review. One purpose of having the accompanying Potential Measure Storymaps is that these can be more regularly updated with new information, case studies and best practice to support the delivery of Potential Measures.
Use of public money A respondent stated that we should stop wasting taxpayers' money on a Local Nature Recovery Strategy.	Central Government (through Defra) have provided grant funding to all Responsible Authorities in England to prepare, consult on and publish an LNRS aligned with the statutory requirements of the Environment Act and LNRS Regulations.

2.2 Support for the proposed Biodiversity Priorities

Consultation response method 1 asked respondents whether they supported the Biodiversity Priorities for Worcestershire proposed in the draft LNRS. Respondents were asked if there was anything missing from the list of proposed priorities, and then to rank the proposed priorities in order of importance to them.

25 further comments on the proposed Habitat or Species Priorities were submitted via **consultation response method 4** (letters and emails). Although received through a different consultation method, these comments were given equal and individual consideration. They can be seen in full, alongside Worcestershire County Council's response, in **Appendix 2**.

Habitat Biodiversity Priorities

Q10: Do you support the Biodiversity Priorities in this theme?

Theme	Number of responses	Yes	No	Don't know
Water and Wetlands	95	85 (89.5%)	5 (5.3%)	5 (5.3%)
Trees, Scrub and Woodland	94	85 (90.4%)	5 (5.3%)	4 (4.25%)
Open Habitats	92	78 (84.8%)	4 (4.4%)	8 (8.7%)
Habitat Connectivity	93	83 (89.23%)	4 (4.3%)	6 (6.45%)
Earth Heritage	90	80 (88.8%)	3 (3.33%)	7 (7.77%)
Green Infrastructure	92	82 (89.13%)	4 (4.35%)	6 (6.5%)

Q11: Is there anything missing that you feel should be a priority for Worcestershire?

Responses to this question are summarised within the six habitat themes:

Water and Wetlands theme	Our response
Six responses highlighted individual wetland sites or catchments they felt were important.	Locations were checked to ensure they were covered by appropriate mapped Potential Measures.
<p>A number of responses challenged the LNRS on how it would tackle the causes of water pollution and how it could hold organisations such as Severn Trent and the Environment Agency to account. The role of citizen scientists in monitoring water quality was also mentioned.</p> <p>Respondents also highlighted the need for greater emphasis on the restoration of hydrological function, to improve water quality and to protect and restore the condition of protected sites.</p>	<p>It is noted that water quality and the condition of our wetlands is a topic of concern to many respondents. The LNRS includes information on water pollution and the relevant statistics on water quality. However, it is not the role of the LNRS to duplicate existing statutory duties or apply additional regulation. The organisations mentioned have both engaged with preparation of the strategy and will have an important role in the delivery of LNRS Potential Measures. Participation in citizen science to monitor changes in water quality within more of our rivers and streams is extremely important and this has been made clearer within the strategy text. The LNRS contains a suite of suggested Potential Measures designed to protect and buffer watercourses and wetlands from pollution and restore hydrological function through the use of nature-based solutions.</p>
Respondents felt that canals and old orchards should be priorities.	Canals have been added to the Water and Wetlands theme. Traditional Orchards are already a priority within the Trees, Scrub and Woodland theme (Biodiversity Priority 20).
One respondent stated that breeding curlews should be a priority.	A Wetland and Wader Birds assemblage is already a species priority for the LNRS. This includes curlew. Potential Measure 63 is mapped to existing and restorable habitat that either does or could support breeding curlew.
One respondent stated that food security should be a higher priority for the LNRS and was concerned that mapped measures suggesting wetland creation and enhancement would take land out of production.	Respondents are reminded that suggested Potential Measures are voluntary actions for landowners and managers who wish to deliver the best outcomes for nature in the best locations. The LNRS is a nature recovery strategy, not a food security strategy, however all Grade 1 agricultural land was removed from mapped Potential Measures in recognition of this point. There are measures within the strategy that it would be beneficial for all landowners/managers to undertake regardless of the specific land use, such as Potential Measures 35 and 36 which focus on improving soil health and preventing soil erosion. We anticipate landowners/managers will make decisions based, at least in part, on what is economically viable for their land.

Water and Wetlands theme	Our response
<p>One respondent stated their concern about the development that has taken place within floodplains, which has destroyed wildlife habitat.</p>	<p>This concern is noted. Proposed changes to planning law within the Levelling Up and Regeneration Act will require all Local Planning Authorities to ‘take account’ of the LNRS when preparing local plans and other spatial strategies and consider the appropriate level of safeguarding to apply to individual sites. All of Worcestershire’s Local Planning Authorities have been engaged in the preparation of the LNRS.</p>
<p>One respondent was unclear about the role of Natural Flood Management (NFM) within the Water and Wetlands theme.</p>	<p>NFM is the focus of Potential Measure 5 within the Water and Wetlands theme. This is a non-mapped measure as NFM interventions are required on a countywide basis within many different catchments. The Storymap for PM5 sets out how this measure was developed and highlights particular catchments that have been prioritised by organisations working on the ground to deliver NFM.</p>

Trees, Scrub and Woodland theme	Our response
<p>A number of responses were concerned about inadequate consideration and protection of ancient woodlands, hedgerows, scrub and ancient trees within the planning system and that too many of these habitats were being destroyed by development.</p>	<p>It is noted that protection of these habitats from damage or destruction by development is a topic of concern to many respondents. Ancient woodland and ancient and veteran trees are mapped within the LNRS as Irreplaceable Habitat. Proposed changes to planning law within the Levelling Up and Regeneration Act will require all Local Planning Authorities to ‘take account’ of the LNRS when preparing local plans and other spatial strategies and consider the appropriate level of safeguarding to apply to individual sites. All of Worcestershire’s Local Planning Authorities have been engaged in the preparation of the LNRS.</p>
<p>Respondents stated that scrub is often misunderstood and undervalued as a habitat yet is vitally important for wildlife such as breeding birds and invertebrates.</p>	<p>Agreed. Scrub is a priority habitat within the LNRS (Biodiversity Priority 18). The LNRS contains two Potential Measures to support the creation and management of scrub habitat: PM23 and PM24. The strategy includes text to emphasise the importance of scrub as a habitat in its own right, as well as a component of a habitat mosaic¹ or ecotone².</p>

1 A landscape composed of different habitat types in close proximity, supporting a wider range of species and ecological functions

2 A transitional area where two habitats meet and graduate into one another e.g. where grassland and woodland meet and the ecotone area supports tussocky grassland and scrub before the habitat grades into woodland



Trees, Scrub and Woodland theme	Our response
<p>Several respondents stated that tree planting should be a priority, as well as the provision of funding for the appropriate aftercare. The need for putting the right trees in the right place and the links to flood alleviation were highlighted. One respondent noted that natural regeneration should be prioritised as a lower-carbon method of woodland creation. Another respondent noted that tree and woodland management carried out on the pretext of tree health (e.g. tree disease such as ash dieback) was sometimes poorly informed and badly executed.</p>	<p>Agreed. Tree planting, woodland cover and woodland condition are all priorities within the LNRS (Biodiversity Priority 9, 10 and 11). The LNRS contains a number of Potential Measures to incentivise tree planting e.g. PM12 and 14. The use of tree planting as a nature-based solution to alleviate flood risk is included within Potential Measure 5, and the importance of riparian tree planting in Potential Measure 2.</p> <p>The use of natural regeneration in woodland creation and enhancement has been added to the wording of all relevant Potential Measures.</p> <p>Case studies and best practice guidance can be added to the LNRS Storymaps to signpost landowners and managers to current Forestry Commission/Forest Research advice on managing tree pests and diseases.</p>
<p>One respondent stated that newly established green spaces should be a priority.</p>	<p>Agreed. Green spaces within the built environment are a priority within the LNRS (Biodiversity Priorities 39 and 40). Potential Measure 39 within the Green Infrastructure theme is mapped to local greenspaces.</p>
<p>One respondent stated that predation control should be a priority.</p>	<p>Unclear if this response relates to predators of wildlife or species that damage habitats within the Trees, Scrub and Woodland theme. Potential Measure 15 covers the control of deer and grey squirrels in the context of preventing damage to and death of trees. Where predator impacts are a factor in the breeding success and/or viability of species populations, this is clear within the wording of the relevant Potential Measure, examples being PM49 Water Vole, PM50 Adder and PM63 Wetland and Wader Birds.</p>
<p>One respondent stated that buffering and protecting ancient woodlands and hedgerows from eutrophication due to agricultural chemical run-off, spray drift and siltation should be a high priority. This response also highlighted the need for deer management.</p>	<p>Agreed. Improving the condition of ancient semi-natural woodland is a priority within the LNRS (Biodiversity Priority 10), as is the extent and condition of hedgerows (Biodiversity Priority 12, 13 and 14). All woodlands designated as Local Wildlife Sites have a suggested minimum 50m buffer through the mapping of Potential Measure 42. Potential Measure 15 covers the control of deer and grey squirrels in the context of preventing damage to and death of trees.</p>
<p>One respondent queried the naming of specific woodlands within the Warndon Villages area of Worcester.</p>	<p>Parts of the woodlands in question are included within the Warndon Woodlands Local Nature Reserve designation, and an overlapping area of woodland is included within the Tolladine Wood, Warndon Wood and Wood Meadow Local Wildlife Site. These are existing designations. All boundaries are displayed and can be queried within the Local Habitat Map 'Areas of Particular Importance for Biodiversity' layer.</p>

Open Habitats theme	Our response
<p>One respondent stated the importance of underlying geology and topography when mapping areas for the creation and enhancement of wetland habitat, and to recognise their importance for a wide range of species.</p>	<p>Agreed. The targeted mapping of Potential Measure 3 (floodplain meadows) and Potential Measure 8 (wetland) were both informed by these underlying datasets. More information on how the measures were developed is set out in the corresponding Storymaps. Wetlands and floodplain grasslands can support a huge number of species.</p>
<p>Two respondents stated that acid grasslands and lowland heathlands should be a priority. It was highlighted that the Local Habitat Map does not show the areas of heathland within the Wyre Forest National Nature Reserve (NNR), and that there is a balance to be struck between giving people access to nature and protecting nature from disturbance.</p>	<p>Agreed. Acid grasslands and lowland heathlands are a priority within the LNRS (Biodiversity Priority 26 and 27). The Wyre Forest NNR is mapped as an 'Area of Particular Importance to Biodiversity' on the Local Habitat Map, but individual habitat compartments within the NNR are not shown. The LNRS is not legally required to display this level of information, however detailed information about the county's habitats is available in the Worcestershire Habitat Inventory³.</p> <p>The concern regarding visitor pressure and disturbance is noted. This issue is acknowledged in section 2.4 of the strategy which sets out the threats and pressures facing the natural environment.</p>
<p>The national importance of Worcestershire's grasslands was flagged up by respondents, and the importance of surveying and protecting the county's 'old grassland' resource.</p>	<p>Agreed. The importance of Worcestershire for this habitat is highlighted within the strategy and by Biodiversity Priority 24 and 25. A new Potential Measure focused on finding, surveying and enhancing the condition of old grasslands⁴, and their waxcap and other grassland fungi communities, will be included in the final LNRS.</p>
<p>One respondent stated that stopping building on important habitats should be a priority.</p>	<p>This concern is noted. All sites with statutory and non-statutory designations and all documented Irreplaceable Habitats are included on the LNRS Local Habitat Map as 'Areas of Particular Importance for Biodiversity'. Proposed changes to planning law within the Levelling Up and Regeneration Act will require all Local Planning Authorities to 'take account' of the LNRS when preparing local plans and other spatial strategies and consider the appropriate level of safeguarding to apply to individual sites. All of Worcestershire's Local Planning Authorities have been engaged in the preparation of the LNRS.</p>
<p>One respondent stated that planning permissions for solar farms were an opportunity to enhance biodiversity if the development was designed and managed with nature in mind.</p>	<p>Agreed. This is included within the LNRS under Biodiversity Priority 41 and Potential Measure 48. The associated Storymap will direct readers to case studies and best practice of how this can be achieved.</p>

3 Available at www.worcestershire.gov.uk/habitatinventory.

4 Grasslands that have remained relatively unmodified by agricultural intensification or land use change, in particular no modern arable management that involves ploughing or application of agri-chemicals. In Worcestershire these include many Medieval ridge and furrow pastures. These grasslands may retain a rich botanical and fungal diversity.

Habitat Connectivity theme	Our response
<p>A number of respondents stated that plan-making and planning decision-making were the biggest obstacles or opportunities to achieving nature recovery at a landscape scale. Respondents flagged the need for more joined-up thinking between internal council departments, better consideration of how site allocations could help or hinder nature recovery and either sever or strengthen existing habitat connectivity, the need for downstream thinking in assessing flood risk, and that biodiversity should be given more weight generally in planning decisions.</p>	<p>This concern is noted. Proposed changes to planning law within the Levelling Up and Regeneration Act will require all Local Planning Authorities to 'take account' of the LNRS when preparing local plans and other spatial strategies and consider the appropriate level of safeguarding to apply to individual sites. All of Worcestershire's Local Planning Authorities have been engaged in the preparation of the LNRS.</p> <p>The strengthened Biodiversity Duty (Natural Environment and Rural Communities Act and the Environment Act) now applies to all public authorities, including Local Planning Authorities. The duty requires authorities to consider what they can do to conserve and enhance biodiversity across all of their functions and to report on the actions they plan to take and have taken. This is an opportunity for cross council-working and to educate and raise awareness.</p>
<p>One respondent stated that dark skies should be a priority.</p>	<p>The LNRS contains a priority for reducing the harm caused by artificial light at night (Biodiversity Priority 35). However, respondents are reminded that the LNRS has no legal powers to make site or area designations, including Dark Skies status.</p>
<p>Respondents welcomed the inclusion of local non-statutory sites within the 'Areas of Particular Importance for Biodiversity' and highlighted the resulting opportunity to raise awareness of these sites amongst landowners and managers.</p>	<p>Agreed. It is hoped that the inclusion of these sites on the Local Habitat Map will increase awareness of their importance within Worcestershire's nature network.</p>
<p>One respondent highlighted an inconsistency between the strategy and the Local Habitat Map with the naming of Biodiversity Priority themes.</p>	<p>This will be corrected.</p>
<p>One respondent stated that the contribution of non-designated priority habitats to the local nature network and nature recovery effort was unclear.</p>	<p>Text has been added to the strategy to clarify the sites that make up Worcestershire's existing Core Nature Network, which includes semi-natural and priority habitat.</p>

Earth Heritage theme	Our response
One respondent stated that schemes such as Catchment Sensitive Farming would have a role to play in targeted areas to support landowners and managers in protecting soils and improving soil health.	Agreed. Funding and support mechanisms such as Catchment Sensitive Farming (CSF) or similar schemes could have an important role in delivering these priorities.
One respondent suggested a number of individual rock formations for protection.	Existing Local Geological Sites as well as Geological SSSIs are included within the Local Habitat Map as 'Areas of Particular Importance for Biodiversity'. It is outside of the legal scope of LNRS to extend or designate new sites.
One respondent stated that all soils (not just agricultural) should be prioritised for improving their carbon content.	Agreed. Potential Measures for other habitats, e.g. restoring and enhancing woodland, grassland, floodplain meadow, will achieve this as a wider environmental benefit of nature recovery.
One respondent stated that the strategy seemed weak in acknowledging the importance of healthy soils to biodiversity	The strategy identifies Soil Health and Protection and Carbon Sequestration within soils as two of the key wider environmental benefits that can be gained from nature recovery. The loss of soil organic matter is stated within the strategy as being one of the threats and pressures facing our natural environment. Potential Measure 35 focuses on actions that landowners and managers can take to improve soil health.
One respondent expressed concern that agricultural soils were being destroyed or sterilised by development.	The presence of best quality agricultural land is a consideration in the planning process, but the level of safeguarding applied is a decision for the local planning authority. It is not within the legal scope of LNRS to map areas of agricultural land that should not be developed.

Green Infrastructure theme	Our response
<p>A number of respondents felt that the protections for existing greenspace within urban areas was not strong enough, and that local plan-making and development decision-making should prioritise the protection and creation of local/neighbourhood green spaces and green belt. Respondents were concerned that economic factors always outweighed considerations around green space and nature (with particular concern over national Government policy for house building), and that developers were either not being required to provide green space or, where they were required to do so, these plans were not being followed through or compliance with the plans was not monitored. Respondents commented that the number and extent of urban green spaces should be increased.</p>	<p>Proposed changes to planning law within the Levelling Up and Regeneration Act will require all Local Planning Authorities to ‘take account’ of the LNRS when preparing local plans and other spatial strategies and consider the appropriate level of safeguarding to apply to individual sites. All of Worcestershire’s Local Planning Authorities have been engaged in the preparation of the LNRS.</p> <p>There are three priorities within the Green Infrastructure theme that are relevant to the protection, provision and enhancement of green spaces and semi-natural wildlife habitats within the built environment (Biodiversity Priority 39, 40 and 41) and eight suggested Potential Measures (numbers 38, 39, 40, 41, 42, 45, 46, 48).</p>
<p>One respondent stated that all neighbourhood green spaces should be recognised on the LNRS Local Habitat Map for their potential contribution as stepping stones and corridors within the nature network.</p>	<p>Agreed that urban greenspaces are vital in providing this connectivity of habitat within and through the built environment. A proportion of Worcestershire’s larger urban greenspaces are mapped individually within Potential Measure 39. More detailed mapping of accessible urban greenspaces can be found on the National Green Infrastructure Framework webmap. Potential Measure 38 also includes provision for the creation and enhancement of habitat stepping stones and corridors within the built environment.</p>
<p>One respondent stated the importance of urban tree cover to climate adaptation and air quality and that this should be a top priority within the Green Infrastructure theme.</p>	<p>Agreed. Urban tree canopy cover is a key component of Potential Measure 38, which recommends achieving a minimum of 20% canopy cover within urban areas.</p>
<p>Three respondents highlighted the swift as a species of particular importance to urban areas and requested stronger wording around the provision of habitat within new development.</p>	<p>Agreed. A House Martin and Swift assemblage is already a species priority for the LNRS. The mapping of corresponding Potential Measure 59 has been expanded to include more of Worcestershire’s urban areas, and the wording of the measure has been strengthened. Potential Measure 38 also includes wording around the installation of swift nest bricks.</p>
<p>One respondent stated that spaces where people encounter nature and can feel a connection to nature – such as gardens and churchyards – should be prioritised.</p>	<p>Agreed. Biodiversity Priority 39 and the corresponding Potential Measure 39 focus on the enhancement of these types of greenspaces for people and wildlife. Health and Wellbeing is a key wider environmental benefit of nature recovery identified within the strategy.</p>

The following general comments were given for all six themes:

Comment	Our response
Public education and community engagement was raised as an important issue in getting local support for the management of wildlife habitats.	Agreed. The strategy sets out the importance of citizen science and ways in which people can contribute. The final version of the strategy will contain more information on the role of different stakeholders in helping to deliver the LNRS, including individuals, community groups and schools
The importance of SMART targets, collecting better quality data and monitoring progress in delivering the LNRS were all highlighted.	Agreed. Part of the LNRS delivery role for Responsible Authorities will include monitoring and reporting on the delivery of LNRS priorities. Defra are preparing guidance on the data that RA's will be expected to collect to fulfil this requirement. The role of citizen scientists in reporting records to Worcestershire Biological Records Centre, iRecord, or other recording schemes, is also an essential one.

Q12: Rank the Habitat Biodiversity Priorities in order of their importance to you

Consultation response method 1 asked respondents to rank the habitat Biodiversity Priorities within each theme in order of importance to them. A rank of 1 denoted the highest priority. This gave a range of data to show which themes, and which priorities, were of greatest importance to respondents.

Levels of engagement with each theme:

Theme	% of respondents engaging with this theme to rank the priorities
Water and Wetlands	64.9
Trees, Scrub and Woodland	66.4
Open Habitats	62.7
Habitat Connectivity	70.1
Earth Heritage	66.3
Green Infrastructure	72.9

Top-ranked Biodiversity Priorities from each theme:

Theme	Top-ranked Biodiversity Priority (by average rank given)
Water and Wetlands	Biodiversity Priority 1: Improve the quality of the water within Worcestershire's rivers and streams
Trees, Scrub and Woodland	Biodiversity Priority 11: Increase the functional connectivity between woodlands at a landscape scale, to allow for species movement
Open Habitats	Biodiversity Priority 21: Increase the extent of floodplain meadow habitat under restoration and in good condition
Habitat Connectivity	Biodiversity Priority 32: Increase the number of Local Sites that are in positive conservation management with habitats in good or recovering condition
Earth Heritage	Biodiversity Priority 38: Improve organic matter, biodiversity, water retention capacity and carbon content within agricultural soils
Green Infrastructure	Biodiversity Priority 42: The delivery of nature recovery is integral to both the strategic planning and design of new development and the development management process

Ranking of Biodiversity Priorities within each theme:

Water and wetlands

Priority	Number of respondents	Average Rank	Number of times ranked 1
Biodiversity Priority 1: Improve the quality of the water within Worcestershire's rivers and streams	67	2.13	43
Biodiversity Priority 2: Improve the availability of water within Worcestershire's rivers and streams to improve the condition of habitats and increase species' resilience to flood and drought events	67	3.03	10
Biodiversity Priority 3: Improve the quality and extent of in-channel and riparian habitat for key species, for example shad, brown trout, eel, white-clawed crayfish and water vole	65	3.98	3
Biodiversity Priority 5: Increase the number of ponds and the extent and connectivity of wetland and terrestrial habitat between ponds	67	4.16	4
Biodiversity Priority 7: Increase the extent of wetland habitats under restoration and in good condition	66	4.36	8
Biodiversity Priority 6: Improve the condition of ponds and the number of ponds that qualify for priority pond status	65	5.11	1
Biodiversity Priority 4: Improve the hydrological functioning and condition of groundwater-fed wetland sites	64	5.33	2
Biodiversity Priority 8: Increase the extent of saline habitats under restoration and in good condition	64	7.41	0

Trees, Scrub and Woodland

Priority	Number of respondents	Average Rank	Number of times ranked 1
Biodiversity Priority 11: Increase the functional connectivity between woodlands at a landscape scale, to allow for species movement	69	3.96	15
Biodiversity Priority 12: Increase the extent of hedgerow habitat to enhance their ability to function as linear corridors for wildlife	67	4.06	6
Biodiversity Priority 9: Increase tree cover in the form of woodland and trees outside woodland, including hedgerow trees, orchards, riparian/wet woodland and urban tree canopy cover	68	4.26	21
Biodiversity Priority 10: Improve the condition of ancient semi-natural woodlands and bring more PAWs woodlands into restorative management	67	4.85	16
Biodiversity Priority 13: Increase the number of hedgerows in good condition for wildlife by managing them according to best practice guidelines	68	4.96	4
Biodiversity Priority 15: Increase the extent of wood pasture and parkland habitat, including to buffer and connect sites of existing importance for biodiversity	66	6.7	3
Biodiversity Priority 14: Improve shrub and ground flora diversity within hedgerows to enhance their function as a food source for wildlife	68	6.82	0
Biodiversity Priority 16: Increase the number of ancient and veteran trees being sensitively managed to extend their lifespan	66	7.09	2
Biodiversity Priority 18: Increase the amount of well-managed scrub habitat	65	8.14	2
Biodiversity Priority 20: Bring more existing traditional orchards into a programme of life-extending, restorative management	67	8.22	2
Biodiversity Priority 19: Create more traditional orchard habitat	67	8.63	0
Biodiversity Priority 17: Increase the amount of standing and fallen deadwood available for wildlife within the wider countryside	67	8.66	1

Open Habitats

Priority	Number of respondents	Average Rank	Number of times ranked 1
Biodiversity Priority 21: Increase the extent of floodplain meadow habitat under restoration and in good condition	66	3.29	18
Biodiversity Priority 24: Increase the extent of lowland meadow habitat under restoration and in good condition	63	4.51	9
Biodiversity Priority 22: Reduce fragmentation and increase the functional connectivity between areas of floodplain meadow	66	4.56	5
Biodiversity Priority 23: Increase the extent of wet grassland habitat under restoration and in good condition	60	4.92	3
Biodiversity Priority 31: Increase the abundance and diversity of pollinating insect species, birds and small mammals on farmland	67	4.94	17
Biodiversity Priority 25: Reduce fragmentation and increase the functional connectivity between areas of lowland meadow	62	5.48	3
Biodiversity Priority 30: Increase the number of sites supporting diverse, well-managed populations of arable wildflowers	63	6.03	6
Biodiversity Priority 26: Increase the extent of acid grassland and heathland habitats under restoration and in good condition	63	6.73	2
Biodiversity Priority 27: Reduce fragmentation and increase the functional connectivity between areas of acid grassland and heathland habitats	63	7.1	3
Biodiversity Priority 28: Increase the extent of calcareous grassland habitat under restoration and in good condition	63	7.44	1
Biodiversity Priority 29: Reduce fragmentation and increase the functional connectivity between areas of calcareous grassland	61	8.38	0

Habitat Connectivity

Priority	Number of respondents	Average Rank	Number of times ranked 1
Biodiversity Priority 32: Increase the number of Local Sites that are in positive conservation management with habitats in good or recovering condition	72	2.18	27
Biodiversity Priority 33: Increase the number of core sites within the Worcestershire Nature Recovery Network which are being effectively conserved and managed for nature	72	2.42	25
Biodiversity Priority 34: Reduce fragmentation and increase the Worcestershire Nature Recovery Network	72	2.96	11
Biodiversity Priority 35: Increase the biodiversity value of road verges across Worcestershire	70	3.53	3
Biodiversity Priority 36: Reduce the harm to wildlife caused by artificial light at night	68	3.79	7

Earth Heritage

Priority	Number of respondents	Average Rank	Number of times ranked 1
Biodiversity priority 38: Improve organic matter, biodiversity, water retention capacity and carbon content within agricultural soils	66	1.68	27
Biodiversity Priority 37: Halt the loss of soils from agricultural land	67	1.97	26
Biodiversity Priority 39: Increase the number of well managed geological exposures to provide early successional habitats important for a range of plant and invertebrate assemblages and nesting birds, as well as research and educational opportunities	68	2.31	15

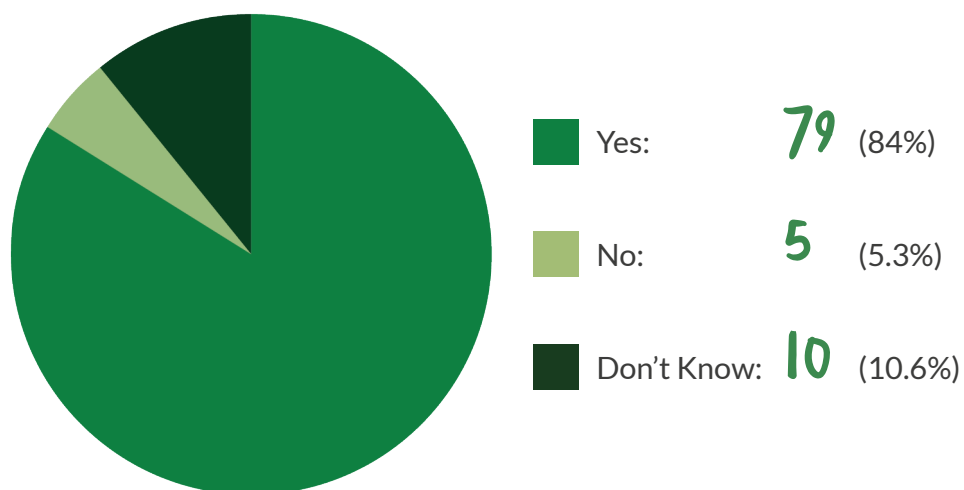
Green Infrastructure

Priority	Number of respondents	Average Rank	Number of times ranked 1
Biodiversity Priority 42: The delivery of nature recovery is integral to both the strategic planning and design of new development and the development management process	73	1.75	36
Biodiversity Priority 41: All built development to maximise the provision of wildlife-friendly features and corridors within their design	73	2.04	19
Biodiversity Priority 40: Cities, towns and villages to be places richer in nature with a greater extent of connected, accessible greenspace within them	75	2.17	20

Species Biodiversity Priorities

Consultation response method 1 asked respondents if they supported the proposed Species Priorities for Worcestershire. Respondents were then asked which species they felt were of highest priority and why.

Q13: Do you support the proposed species priorities for Worcestershire?



7 respondents did not answer this question. Of those who replied either 'no' or 'don't know', 3 respondents provided an answer as to why they chose that response:

- ✿ I do not support the Rare Plants 'Assemblage', although I do support the conservation of these species individually. The Wet Woodland Plants Assemblage is a true assemblage and I would like to see an additional one 'Rare Arable Plants Assemblage'.
- ✿ There are so many it is too difficult to choose just five.
- ✿ It is a diverse county and Bredon Hill villages support the Spotted Flycatcher, Sky larks and barn owls are also crucial on the hill.

Q14: Which of these species/assemblages is the most important to you?

Respondents were given a list of all the species and species assemblages proposed as priorities within the LNRS and were asked to select a maximum of five species or species assemblages in answer to this question.

Species/Species Assemblage	Number of times selected
Hedgehog	52
House Martin and Swift assemblage	43
Water Vole	38
Woodland Bat assemblage	29
Farmland Bird assemblage	29
Dormouse	23
Wetland and Wader Bird assemblage	22
Nightingale	17
Migratory Fish assemblage	16
Adder	14
Toad	13
Black Poplar	13
Cave and Building Bat assemblage	13

Species/Species Assemblage	Number of times selected
Wet Woodland Plant assemblage	13
White-clawed Crayfish	12
Rare Plants assemblage	12
Turtle Dove	11
Fritillary Butterfly assemblage	11
Pied Flycatcher	8
Brown Hairstreak	5
True Service Tree	4
Longhorn Lime Beetle	4
Poplar Leaf-rolling Weevil	3
Six-spotted Pot Beetle	2
Kentish Glory	1
Helleborine assemblage	0



Hedgehog



Swift



Water vole



Bechstein's bat



Corn bunting



Dormouse



Curlew

Q15: Please explain why you have selected this/these species as the most important to you?

77 respondents answered this question. Their comments are given in full below.

Comments
Adder - I feel further studies looking for existing sites are necessary. Also, specific sites are threatened by fragmentation and public disturbance. Water vole - Seem to be all but lost in Worcestershire. Targeting their habitat is vital to their success and would also benefit their associated habitat Wet woodland - Often left out. It is another habitat really struggling from fragmentation and poor water quality
They all need protecting
Our Millennium Green and adjacent areas have good (but isolated) wetland habitats that offer excellent potential for these marginal / declining species.
I believe that my limited selection of 5 categories are the most threatened through the continuing loss of wildlife habitat resulting from the increasing development being allocated to Wychavon.
These interest me.
act as indicators for other impacts
No detailed comment at this time. However, a query, how many captive breeding programmes are there in our county for increasing the number of adders?
It is impossible to pick one, one of the fields I walk in has a Bee orchid but only every few years
Species which are local
I am a farmer
Bats, there environment is threatened and they perform a function in reducing fly's/ insects
Personal connection with these
because making improvements for these species would also create better spaces for other wildlife.
They are all important. I couldn't really argue for one species over another.
Toads and hedgehogs are natural pest control mammals which help reduce the number of insect pests for wildflowers. Fish need help alongside the water quality of our streams and rivers to increase species numbers and biodiversity, including wetland and wading birds.
i have focused on habitat improvements that will hopefully also benefit the species under threat
These are the most achievable measures (through reintroduction schemes, nest provision) and in the case of bats, the most influential in terms of habitat management implications for a range of species.

Comments

related to wetland

Popular appeal, past associations, indicators of nature's struggle.

I don't know which i would choose, but would prioritise species that have the most benefit to the wider natural world.

These species are/should be important within the MHNL

These are most relevant to our local parish area.

Can't select all! By protecting and improving habitats and focusing on assemblages there is a broader scope to improve the condition of individual species. Work focused on one species is still beneficial to many others.

They are in decline

The song of the nightingale and turtle dove, both of which I have heard should never be lost in England. Hedgehogs are adorable and I cannot imagine life without them, I have had them in the garden before. I don't wish to lose any more birds so swifts and house martins plus bats at night, my bat box has pipistrelles on and off. I want to same everything on the list so very difficult!

Species most likely to be seen and thrive in my local area (near woodlands, fields, hedgerows) so feel particularly relevant to me

Species I have an awareness of

Probably least popular but just as, if not more, important as others. Also we have many pubs named after Wild Service Tree berries once used to flavour ale - CHEQUERS

I feel these are prominent species that have declined over recent years and it would be a great shame if we were to lose them from our countryside.

Both are red-listed species but have sufficient numbers in Worcestershire to enable recovery of their numbers through simple, cheap and proven measures of nest site protection and provision in all new development and extensions, which is in line with the principle of the LNRS.

They are key identifiable British species. All are equally important but these are more symbolic.

These are all species that we know need protecting locally as they have become increasingly rare due to the loss of habitat and need for wildlife corridors. However, many species require environmental protections in and around Hagley

Few areas within the county that these could thrive, but this means these areas can be quickly targeted, species improved, then move on to other species, once there is knowledge and skill to improved habitat and reintroduction, rather than trying to do it on a county wide basis & failing because we are stretched too thin.

Comments

To select 5 from a long list is wrong. They are all important

This is really difficult to state, I believe County Agents and Officers will know best about which actions will have the greatest impact on as many species to maximise benefit.

Water vole is a flagship and indicator species of freshwater habitat health. Its decline has been dramatic and could be relatively easily reversible if predator control and habitat creation can be implemented. Through re-wilding and changes in agricultural practices, Turtle Dove numbers can be increased relatively quickly. Hedgehog is a health indicator of a variety of different habitats, both urban and rural. Decline in numbers has been dramatic, but contributions to its recovery can be delivered by a huge range of people including individuals, so this species provides an opportunity for everyone to be involved in nature recovery. Wetland and Farmland bird assemblages are indicators of wider habitat health and prioritising them will have much wider benefits.

most recognisable in my area

All important.

Selected wildlife, that was commonplace, has become endangered within a generation.

I am most interested in river health

They are the most declined in my area

They are all important species of equal importance to preserve so this was an arbitrary selection picking diversity.

Although not common when I was young there were certainly more of them around than there are today. Such a shame for future generations that they cannot easily see these magnificent examples of nature due to human expansion into countryside's and pollution of our waterways.

Most common species interactions

House Martins and Swifts are red-listed birds that have good populations in Worcestershire, but plenty of scope to increase more. They can be easily helped through nest site provision and protection. Suggested potential measures: there should be at least one Swift brick on average in each extension and new development, in accordance with best practice guidance and national planning policy. Existing nest sites are used year after year and should be protected. Prioritising wet woodland, farmland, Water Voles and Nightingales will also help a large range of other species.

Local importance

They are important!! However, I have selected these species as they represent/inhabit the diverse habitats in Worcestershire. Each is dependent on the health of their particular habitat, therefore if they are thriving, their habitat is healthy and other species there will thrive, too.

They are all species which ***redacted text*** is working to conserve

These are species that exist near us and we would be able to help thrive

Comments

Brown hairstreak - a vulnerable species but with improved habitat management and greater habitat connectivity, populations could recover within the region. It is already present on ***redacted text*** land at Roundhill Wood LWS, Naunton Beauchamp (Naunton Court Meadows SSSI and surrounding fields), land at Sheriffs Lench and Ab Lench. Poplar Leaf-rolling Weevil - present in ***redacted text*** Roundhill Wood LWS, and nearby Grafton Wood, so important to focus conservation efforts on this Nationally Rare species and their management requirements. Turtle dove - the variety of habitats on ***redacted text*** land within the Lenches, and our connectivity with neighbours such as ***redacted text*** could provide suitable conditions for turtle dove to recolonise. There is the opportunity for providing greater areas of scrub and mature hedgerows, amongst other specific measures required. Woodland bat assemblage - there is potential for ***redacted text*** to be involved in creating and restoring habitats, particularly hedgerows and woodlands to support important bat species such as Barbastelle and Bechstein. With improved management we see the potential for these bat species to be present within Roundhill Wood LWS, and improving habitat connectivity across the landscape within nearby woodlands such as Grafton Wood would aid species recovery. Wetland and wader bird assemblage - the creation and enhancement of suitable habitats such as floodplain meadows, scrapes and ditches across the Warwickshire Avon catchment will contribute to this important bird assemblage's recovery. ***redacted text*** land within Worcestershire has scope to provide additional wetland habitats to support this species assemblage recovery.

These are the species which we are more likely to find in the immediate countryside surrounding our villages.

I have selected the species where I can do most personally on the ***redacted text***. However if I was not limited to five I would have added Hedgehog, Nightingale, Toad, True Service Tree, Black Poplar, Cave and Building Bat assemblage, Migratory Fish assemblage (European Eel).

Most familiar and have noticed huge reduction in numbers since my childhood

They are at great risk of disappearing completely.

I have been obsessed with nightingales for years and am currently the Nightingale lead for the ***redacted text*** volunteer group. We would be happy to help with any nightingale conservation efforts in the county and can provide labour via the ***redacted text*** volunteer group. I also survey various site around the county for the ***redacted text*** - I am aware that we are lucky enough to have good populations of farmland birds locally - particularly Yellowhammers, Corn Buntings and Skylarks and these need to be protected.

Rare Plants - because I have been closely involved with conservation efforts across the County on the botanical and semi-nat habitats side and these are all priority species both nationally and regionally/locally....none of them of course are lowland meadow specialists, but I could easily name some! Wet Woodland is a national priority habitat e.g north worcs (Stour Catchment) and severn valley alder/willow carr W6 & W7....whole assemblage of threatened plants and fauna associated with this habitat type Wetland waders - chronically and severely affected by drainage, intensive agriculture and now climatic change. Snipe should be included with these 3 Farmland birds - North Worcs and Staffordshire edge where I live has seen virtual extinction of breeding corn bunting & especially over the last 15 years. Why isn't yellowhammer included?? there has been a massive recent population crash! Water Vole: because virtually non-existent in Worcs now - failure of the Bromsgrove/Sanders Park project! Main problem we all know is mink predation as well as habitat depletion. Apparently Warwicks projects are doing better than Worcs (!?!)

I see them as the species most vulnerable to change and from impact from human disturbance

Comments

Have a particular interest in invertebrate conservation combined with concern over the loss of swifts and house martins locally

This is a very difficult exercise, choices are based on local knowledge of species conservation urgency and opportunity as well as opportunities for wider conservation benefit served by prioritising action for these species/assemblages

They are iconic species which demand rich ecological environments if they are to thrive. They are measurable species and they get people interested in nature.

These species have core populations in the Malvern Hills and are likely to be considered as priority species for targeted projects in our upcoming Land Management Plan. We must protect known strongholds for these species and work on connectivity to support their expansion into surrounding habitats.

I have lived in the north of Redditch for over 30 years and have had house martins nesting on my house every year, hedgehogs visiting the garden and bats flying over. There has been clear habitat loss in this area; hedgerows ripped out behind garden fences, use of toxic glyphosate weed killers and over mowing of verges. We no longer get bats flying over the garden and fewer signs of hedgehog activity.

Can I also add known red listed birds like Linnets and Skylarks and include Bees and pollinators

I can't, I don't have sufficient knowledge.

My interest is in mammals and birds

Personal preference

I regret the relative scarcity of all the species listed but I miss the sight and sounds of birds most

Coming from a resident based in Catshill, Bromsgrove, we are lucky to have a large poplar along the Millennium Walk pathway, and a good amount of returning swifts, we also have bats and visiting lapwing and curlew in the late Autumn and winter months. These species are important to me, and I'd like to see more protection for other areas within Worcestershire

These species and assemblages are the most relevant to urban settings, and indicate the wider health of this environment.

Seen in urban areas even where no green space - red-listed & endangered.

Because cover a range of habitats

Farmland birds under threat and other funding models are not supporting their loss or that of their desired habitat

Putting in place changes that have positive outcomes for a range of species seems far more sensible. Greater 'bang for your buck' and also alleviates the potential inadvertent negative side effects focusing on one species can bring.

Impossible choice - where are the barn owls and skylarks!

Each covers different habitat

Comments

I think they are all important but chose these as they are more relevant to the area of Worcestershire in which I live.

Hedgehogs are under threat so need more support. I have an interest in bats. Keen to improve rivers providing greater access for variety of fish species.

Q16: Are there any additional species that you feel require bespoke conservation measures?

77 respondents provided an answer to this question. All proposals, and Worcestershire County Council's response, are detailed in full below.

Additional species suggested	Our response
Stag beetle	Agreed that existing habitat Potential Measures do not fully account for the requirements of this species. Stag beetle to be added to the LNRS as a new Priority Species.
Slow worm	Slow worm has been assessed by local species experts as Category A ⁵ , meaning that it's requirements can be met by the provision of more, bigger, better-connected habitat. The needs of this species are considered to be met by existing habitat Potential Measures.
Reptiles in general are suffering and need to be given more consideration.	Adder is a Priority Species for the LNRS. Grass snake and Common lizard were assessed by local species experts as Category A, meaning that their requirements can be met by the provision of more, bigger, better-connected habitat. The needs of these species are considered to be met by existing habitat Potential Measures.
Fallow deer, owls, woodpeckers, hares, and many, many more. We need to need to increase the flora cover and un-interrupted zones of natural species of trees and grasslands where threatened fauna species can thrive without interference from human development.	All species mentioned were assessed by local species experts as Category A, meaning that their requirements can be met by the provision of more, bigger, better-connected habitat. The needs of these species are considered to be met by existing habitat Potential Measures.
Special historic herbs - now no longer used for food/medical use - e.g. those toxic. Particular species which will grow favourably in a warming climate. One example - <i>Ruta chalepensis</i> Fringed Rue - not the more common types!	The example given, <i>Ruta chalepensis</i> Fringed Rue, is not native to the UK. Inclusion of non-native species as LNRS priorities would be non-compliant with DEFRA's LNRS guidance.

5 The Department for Environment, Food and Rural Affairs (Defra) advice to Responsible Authorities on species recovery within Local Nature Recovery Strategies set out a process to guide the selection of LNRS priority species. This included categorising species to help identify which would benefit from bespoke LNRS measures.

Additional species suggested	Our response
I think there used to be sedge warblers in the Offerton Lane Nature Reserve and, I think, brown hairstreaks, but now even the open water available is so small that a few teal can fly in but nothing else. It should be a rich site that sustains mallards, swans, moorhens, coots, kingfishers and, probably water voles. It is an issue I have been challenging the city council to address. Any help you can give would be appreciated.	This is a statutory designated site for nature conservation - Offerton Wetlands Local Nature Reserve – and is therefore mapped as an Area of Particular Importance for Biodiversity within the LNRS. The mapping of Potential Measures will be reviewed in this location.
Reintroduction of beaver is such a great thing and will provide a landscape scale benefit.	Agreed. The wording of existing Potential Measures (PM5 and PM8) has been strengthened to emphasise support for the use of keystone species to contribute to the restoration of wetland ecosystem function. At this stage it is not possible to target the mapping of a specific species Potential Measure for beaver reintroduction.
Hedgehog	Hedgehog is a Priority Species for the LNRS.
Ash trees that are resistant to disease - collect seed pods and grow from them - as fast as we plant we lose trees from disease.	Latest guidance from Forestry Commission has been obtained to amend the wording of existing Potential Measure 18 to support the continued establishment of ash as a hedgerow tree through natural regeneration or existing stock.
Otters	Otter has been assessed by local species experts as Category A, meaning that it's requirements can be met by the provision of more, bigger, better-connected habitat. The needs of this species are considered to be met by existing habitat Potential Measures.
Hagley has had recorded sightings of osprey which need specific conservation measures	Osprey has been assessed by local species experts as Category G (vagrant/ occasional visitor). If breeding is established/confirmed within Worcestershire the species can be considered for inclusion within the next iteration of LNRS.
Hagley has had recorded sightings of polecats which need specific conservation measures	Polecat has been assessed by local species experts as Category E: (needs better evidence /research priority). If breeding is established/confirmed within Worcestershire the species can be considered for inclusion within the next iteration of LNRS.

Additional species suggested	Our response
Skylarks seem to have disappeared from the local landscape.	Skylark has been assessed by local species experts as Category A, meaning that it's requirements can be met by the provision of more, bigger, better-connected habitat. The needs of this species are considered to be met by existing habitat Potential Measures and the Farmland Birds assemblage priority (PM65). Case studies/guidance will be added to the PM65 Storymap on skylarks.
Lesser Spotted Woodpecker	Lesser Spotted Woodpecker has been assessed by local species experts as Category A, meaning that it's requirements can be met by the provision of more, bigger, better-connected habitat. The needs of this species are considered to be met by existing habitat Potential Measures.
Hawfinch	Hawfinch has been assessed by local species experts as Category A, meaning that it's requirements can be met by the provision of more, bigger, better-connected habitat. The needs of this species are considered to be met by existing habitat Potential Measures.
Willow Tit	Confirmed by local species experts as being extinct as a breeding species in Worcestershire
Brown Hare	Brown hare has been assessed by local species experts as Category A, meaning that it's requirements can be met by the provision of more, bigger, better-connected habitat. The needs of this species are considered to be met by existing habitat Potential Measures.
Grassland fungi, particularly waxcaps - grazing/cutting regime and low inputs required to create the correct habitat.	Agreed that existing habitat Potential Measures do not fully account for the requirements of this species group. Waxcap and other Grassland Fungi to be added to the LNRS as a new Priority Species assemblage.

Additional species suggested	Our response
I would like to see a 'Rare Arable Plants assemblage' which would enable the identification of sites that would be of at least county importance as judged by Plantlife's Important Plant Areas Project. I think that this assemblage needs bespoke measures because of the length of viability in the seedbed, which requires long-term monitoring and review as well as detailed targeted management.	'Increasing the number of sites supporting diverse, well-managed populations of arable wildflowers' is already an LNRS priority, with two associated mapped Potential Measures (PM 32 and 33).
I would like to see a 'Waxcap and Other Grassland Fungi' assemblage, since the grassland habitats are only assessed on their plant richness.	Agreed that existing habitat Potential Measures do not fully account for the requirements of this species group. Waxcap and other Grassland Fungi to be added to the LNRS as a new Priority Species assemblage.
Native orchids, more specialised sites need protection	Orchid species will be covered by the relevant habitat Potential Measures, primarily PM29 and 31, potentially PM3 or 8. Many sites supporting these species will be recorded as Local Wildlife Sites or Grassland Inventory Sites and mapped as Areas of Particular Importance for Biodiversity within the LNRS.
Gagea lutea (?) <i>Impatiens noli-tangere</i> 1) Yellow star-of-Bethlehem - reduce competitor spp such as <i>Alium paradoxum</i> and Ramsons. Just a handful of sites 2) touch-me -not balsam - may have gone extinct at one known wet woodland locality....re-introduction?	These species were given additional consideration but have not been selected as LNRS priorities at this time. Both Yellow Star-of-Bethlehem and Touch-me-not Balsam are Least Concern on the Vascular Plant Red Data List. Both have limited population numbers and distribution within Worcestershire and the sites where they are found are all covered by appropriate Potential Measures (e.g. PM8, PM41) or are designated sites mapped as APIB. Touch-me-not Balsam is not considered to be native to Worcestershire. Yellow Star-of-Bethlehem is listed as a Category A species under the Rivers and Streams and the Native Trees and Woodland sub-themes.
Beaver. Though trial introductions have happened, not officially sanctioned by UK Govt - depends on that! Would be magnificent for flood control and water quality improvement.....eco-services	Agreed. The wording of existing Potential Measures (PM5 and PM8) has been strengthened to emphasise support for the use of keystone species to contribute to the restoration of wetland ecosystem function. At this stage it is not possible to target the mapping of a specific species Potential Measure for beaver reintroduction.
Swift - factors outside this country (migration pressures) but also building design!	House Martin and Swift are a Priority Species assemblage in the LNRS. The mapping of the associated Potential Measure has been extended and the wording of the measure enhanced.

Additional species suggested	Our response
<p>Spring Ephemeral plants on the ridge of the Malvern Hills - prone to foot / bike disturbance and high risk of being lost due to increased recreation. There is nowhere for them to migrate to (as they are at the top of the hill and the surrounding soils are too deep for them). Extremely rare for Worcestershire as they are Upland plants in Lowland England.</p>	<p>Without names of specific plants this cannot be investigated. The location referred to is within the Malvern Hills SSSI and such species may already be included within the SSSI citation or Natural England's Views About Management.</p>
<p>Think it would be good to include a woodland butterfly assemblage which include Wood White, White Admiral, Silver-washed Fritillary. They all require sunny and open conditions within woodland with good connectivity between woods</p>	<p>These species have been assessed by local species experts as Category A, meaning that their requirements can be met by the provision of more, bigger, better-connected habitat. The needs of these species are considered to be met by existing habitat Potential Measures.</p>
<p>Great crested newt</p>	<p>Great crested newt has been assessed by local species experts as Category A, meaning that it's requirements can be met by the provision of more, bigger, better-connected habitat. The needs of this species are considered to be met by existing habitat Potential Measures.</p>
<p>Where populations are at risk of genetic isolation - such as adders. Species reintroduction/supplementary populations would help here. This has been done with the pearl bordered fritillary with good success so far.</p>	<p>Adder is a Priority Species for the LNRS. Consultation with species experts has confirmed that existing adder populations are not big enough to take individuals from and they are too difficult to breed in captivity (previous attempts have been unsuccessful). It is considered better to increase the size of existing populations by focusing on habitat enhancement and connectivity and reducing disturbance. It may be feasible to swap wild individuals between existing separate populations to increase genetic diversity.</p>
<p>The fox. I believe education and myth debunking important to stop the persecution of this species.</p>	<p>European fox does not meet the criteria provided by Defra for consideration for inclusion within the LNRS. The species is listed as Least Concern by IUCN.</p>
<p>Violet click beetle, not listed above but sites of national importance within the LNRS</p>	<p>Violet Click beetle has been assessed by local species experts as Category A, meaning that it's requirements can be met by the provision of more, bigger, better-connected habitat. The needs of this species are considered to be met by existing habitat Potential Measures such as Potential Measure 22 (Enhance landscape connectivity for species using veteran and ancient trees).</p>

Additional species suggested	Our response
<p>Sky larks and ground nesting birds need to be kept away from walkers' dogs while other predators need management</p>	<p>Disturbance is included within section 2.4 Threats and pressures facing our natural environment as a factor impacting our wildlife. Reduction of disturbance and use of predator control is also explicit within the wording of Potential Measure 63 (Wetland and Wader Birds priority). Skylark has been assessed by local species experts as Category A, meaning that it's requirements can be met by the provision of more, bigger, better-connected habitat. The needs of this species are considered to be met by existing habitat Potential Measures and the Farmland Birds assemblage priority (PM65). Case studies/ guidance will be added to the PM65 Storymap on skylarks.</p>

Summary of changes made to the LNRS Species Priority list:

New Priority Species added

- ✿ Priority/Potential Measure 76: Increase the numbers and distribution of Stag Beetle

New Priority Species Assemblage added

- ✿ Priority/ Potential Measure 77: Increase the numbers and distribution of Waxcap and other Grassland Fungi

2.3 Wording of suggested Potential Measures

Consultation response method 1 asked respondents if they wished to comment on the existing wording of any of the suggested Potential Measures. Answering 'Yes' directed respondents to a secondary questionnaire (**consultation response method 2**).

Respondents were then asked if they thought any additional (new) Potential Measures were needed.

74 further comments on the wording of Potential Measures were submitted via **consultation response method 4** (letters and emails). Although received through a different consultation method, these comments were given equal and individual consideration. They can be seen in full, alongside Worcestershire County Council's response, in **Appendix 2**.

Q17: Do you wish to make comments on the wording of any of the Potential Measures?

A number of responses received to this question related instead to the **mapping** of existing Potential Measures and are instead reported in section 2.5. The remaining responses are shown below.

Potential Measure	Comment	Our response
PM 38 Increase the extent, connectedness and quality of wildlife habitats within the built environment	We feel that this too could benefit from being an unmapped measure as there is opportunity to improve wildlife habitats in all built environment (not just the urban settlements that are 85ha or larger). Similarly we feel that the measures listed for new developments are not ambitious enough for smaller developments. Individual households too should be able to include a bat box and a bird box for instance. We also wondered whether retrofitting SuDS and blue-infrastructure could be mentioned too. Retrofitting SuDS such as Severn Trent have done in Mansfield recently create huge opportunities for the creation of wildlife habitats.	<p>Whilst recognising that the built environment is a wider domain than the areas prioritised for Potential Measure delivery in the Draft Local Habitat Map, this principle holds true for many other LNRS Biodiversity Priorities, and the advice of our Expert Task and Finish Group is that the benefits of the spatially restricted prioritisation of Worcestershire’s (peri) urban environment for PM delivery outweighs the disbenefits of making conservation and enhancement of wildlife in the built environment an entirely non-mapped measure. Whilst non-mapped measures have equal importance and weighting in LNRS as mapped measures, the Expert Task and Finish Groups recognised that highlighting the contributions which landowners, land-managers, residents, gardeners, communities and businesses can make towards nature’s recovery forms a critical function of LNRS, and additional feedback during Pre-Consultation from our Supporting Authorities indicated that articulating PM38 as a mapped measure in the Local Habitat Map improved legibility of potential nature recovery opportunities to LNRS’s stakeholders.</p> <p>The Storymap for PM38 includes recommendations for wildlife-friendly homes and gardens, including at an individual householder level.</p> <p>Wording has been added to PM38 about water management within the built environment, referring specifically to SuDS, culverts and raingardens.</p>

Potential Measure	Comment	Our response
PM 62 Remove barriers to migratory fish passage	Species assemblage: Migratory Fish Not against removing Barriers but that is not sufficient to support Migratory Fish. Need also to look at the Quality of the Water, the state of the river flora (weed) and fauna (invertebrates). Focusing on the state of the gravel beds where the migratory fish spawn	Additional wording has been added to PM62.
PM 59 Increase nesting habitat and food sources for House Martin and Swift	Please include wording that there should be at least one swift/universal brick per dwelling (and in extensions where possible) as per national and best practice guidance. National Planning Practice Guidance (NPPG) 017 Reference ID: 8-017-20250609 How can developments incorporate features which support priority or threatened species? https://www.gov.uk/guidance/natural-environment The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs. The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes. The British Standard Institute recognises 'universal' bricks' for a variety of red-listed cavity nesting bird species eg. swift, house martin (see The Duchy of Cornwall Big Bird' project https://nansledan.com/duchy-nest-brick-project-boosts-endangered-wild-birds), house sparrow, starling as well as other species such as blue tits, great tits, tree sparrows. Protecting existing nesting sites of building dependent species is also vitally important, so the LNRS should also state that existing nest sites of building dependent species are protected where possible. Please refer to the Isle of Wight published LNRS which has been recognised as an "exemplar".	Additional wording has been added to PM59.

Potential Measure	Comment	Our response
PM 42 Buffer and enhance habitat connectivity around and between non-statutory nature conservation sites	Whilst it is appreciated that buffer zones are required around existing designations, we consider that more flexibility should be introduced into the wording of PM42 to allow consideration of reduced buffer zones where appropriate. The current strategy proposes a universal 50m buffer zone around all non-statutory nature conservation sites. While we do not object to this strategy in principle, any projects which could adversely affect a non-statutory site would be subject to a specific assessment anyway, which would need to consider the designated features of the site and specifics of impacts. To this end, we would suggest that wording should be inserted into the strategy to caveat that specific buffer/enhancement zones should be commensurate with the scale of project impact and specifics of designated features, some of which will be more sensitive than others.	We concur that flexibility is required when considering the effects of land management and proposals around existing designated sites, for example: hydrological pathways and impacts very often extend far beyond the 50m buffer as has been used in modelling extent and distribution of PM42. Nevertheless, LNRS regulations and guidance are clear that Potential Measures do not pose a land management or development constraint nor do they compel land-owners to modify land-management practices, additionally the Local Habitat Map highlights the need for site-specific assessments to be undertaken to inform development of individual projects, and to ensure feasibility studies and project design properly reflect constraints and opportunities as may be identified by such studies. We feel advice provided in this context provides sufficient awareness-raising of the need for site and scheme-specific assessments.
PM 59 Increase nesting habitat and food sources for House Martin and Swift	Add number requirements as per NPPG Natural Environment 2025 paragraph 017, i.e. at least one per dwelling on average for new developments. Artificial nest cups for House Martins are an alternative option where specified by an ecologist.	Additional wording has been added to PM59.

Q18: Are there any additional Potential Measures you think are needed?

Those who answered 'yes' to this question provided a variety of responses. Many comments related instead to the *mapping of existing* Potential Measures, and these are reported in section 2.5. The remainder of comments are detailed below.

3 further comments on the need for additional Potential Measures were submitted via **consultation response method 4** (letters and emails). Although received through a different consultation method, these comments were given equal and individual consideration. They can be seen in full, alongside Worcestershire County Council's response, in **Appendix 2**.

Comment	Our response
Retention of farms and farmlands	This is outside of the legal scope of LNRS.
Mapping of Curlew nesting sites, hay mowing timing and predator control.	PM63 maps habitat creation and enhancement opportunities for wetland and wader birds, including curlew. Individual species records are not included on the Local Habitat Map.
Identification of sites important of grassland fungi.	A new Priority Species Assemblage has been added to the LNRS: Increase the numbers and distribution of waxcap and other grassland fungi . This priority will have an associated non-mapped Potential Measure (new PM77). The wording of the measure will include the need to locate, survey and document the condition of more of Worcestershire's 'old grasslands'.
Conservation of Rare Arable Plants. This would support the proposed new Species Biodiversity Priority of 'Rare Arable Plants assemblage'. While this might be expected to be provided by PM 23, I would argue that there is a need to highlight the most important sites which are of county or higher importance. This is for two reasons. 1. Unlike grasslands where the most important sites are highlighted by being LWS or Grassland Inventory sites, the arable sites have not been picked up as APIB. 2. The management of these sites will not be adequately covered by the general prescriptions in PM23. Depending on the species this management will vary with the soil type, whether spring or autumn germination, depth of cultivation etc. I have mapped the sites on my own estate. It will support the same wider environmental benefits as PM23.	<p>'Habitats associated with arable farmland' is already proposed as a priority within the LNRS. There are two associated Potential Measures dedicated to rare arable wildflowers:</p> <ul style="list-style-type: none"> ❁ Potential Measure 32: Expand existing populations of arable wildflowers ❁ Potential Measure 33: Create new arable wildflower sites <p>Both of these measures are mapped: PM32 to sites already known to have important populations of rare arable wildflowers; PM33 is targeted more widely using a modelling methodology that utilised the Worcestershire Habitat Inventory⁶, the NE and BSBI Summarised Botanical Value Map, and Plantlife's Important Arable Plant Areas dataset.</p> <p>It is considered that these two Potential Measures provide sufficient consideration of rare arable plants.</p>

6 Available at www.worcestershire.gov.uk/habitatinventory

Comment	Our response
<p>Conservation of Waxcap and other Grassland Fungi. This would support the proposed new Species Biodiversity Priority of 'Waxcap and other grassland fungi'. Because the sites which are of county importance for this community will not necessarily be covered by the Potential Measures for species rich grasslands (PM21 to PM29) and because they have not necessarily been identified as LWS they deserve a PM of their own. Ideally this would be mapped but I suspect there is not sufficient data for this to be done, and so I propose a non-mapped PM. It will support the same wider environmental benefits as PM21 to PM29.</p>	<p>A new Priority Species Assemblage has been added to the LNRS: Increase the numbers and distribution of waxcap and other grassland fungi. This priority will have an associated non-mapped Potential Measure (new PM77). The wording of the measure will include the need to locate, survey and document the condition of more of Worcestershire's 'old grasslands'.</p>
<p>I believe that there should be a countywide survey effort for unrecorded and un-documented grasslands. There are lots of grasslands across the county including old ridge-furrow, which are unsurveyed and do not appear on either WHI or magic.gov. I am frequently finding these and often well off the beaten track where there are no PROWs! There should be a new Phase 1, countywide survey to update the Grasslands Inventory, particularly focusing on areas in extreme corners of Worcestershire which are not prioritised by conservation bodies - for example NE Worcs - Birmingham edge/Warwickshire boundary; the Tenbury arm; SE Worcs still on the Lias - eg Honeybourne, Cleeve Prior, Weston sub- edge, Willersey, Childswickham (foot of the Cotswolds scarp). Lots of ridge-furrow sites around there too. Often completely ignored by past surveys. Need to consult the old Phase 1 maps too!</p>	<p>A new Priority Species Assemblage has been added to the LNRS: Increase the numbers and distribution of waxcap and other grassland fungi. This priority will have an associated non-mapped Potential Measure (new PM77). The wording of the measure will include the need to locate, survey and document the condition of more of Worcestershire's 'old grasslands'.</p>
<p>Be good to look to increase early successional habitats including areas of bare ground which are important for a range of species. Could be an opportunity for BNG within new developments and easy to achieve.</p>	<p>This suggestion has been used to improve the wording of existing Potential Measure 23.</p>

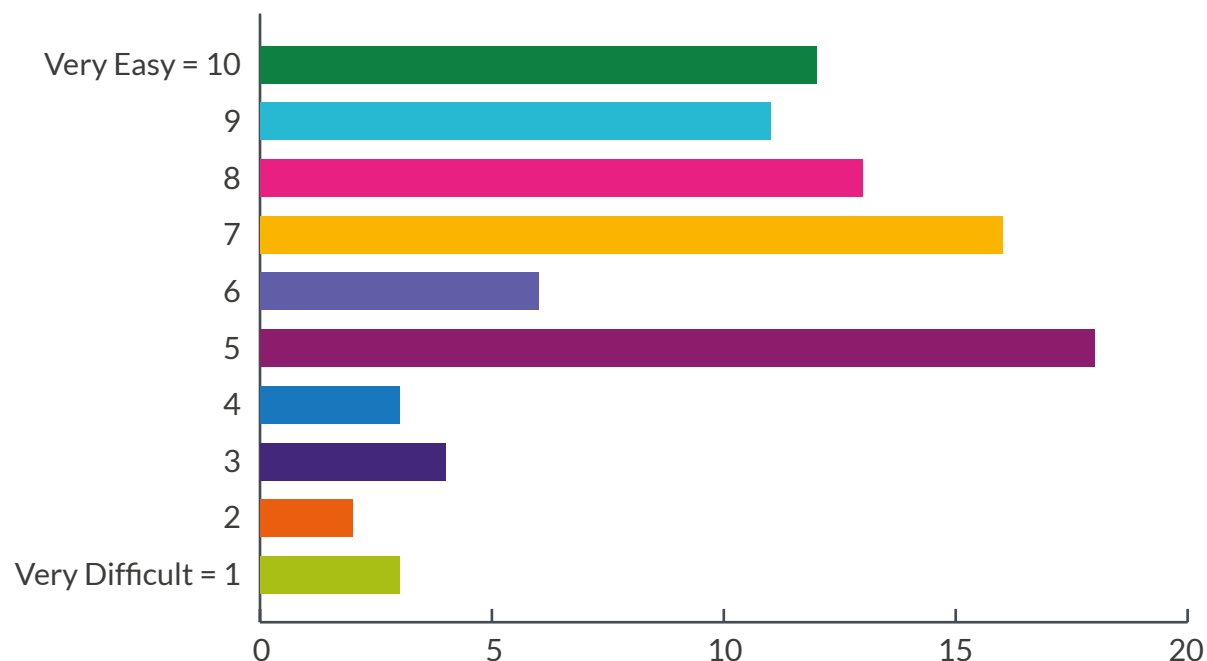
2.4 Local Habitat Map functionality and guidance

Consultation response method 1 asked respondents about their experience of using the draft Local Habitat Map.

Q19: How easy did you find it to navigate around the Local Habitat Map and find the information you were looking for? (1 = Very Difficult; 10 = Very Easy)

88 respondents answered this question. The average of all the scores given was 6.72 out of 10.

Score	Number of people	Colour on Bar Chart
Very Easy = 10	12	Apple Green
9	11	Turquoise
8	13	Pink
7	16	Yellow
6	6	Violet
5	18	Mulberry
4	3	Blue
3	4	Purple
2	2	Orange
Very Difficult = 1	3	Lime Green



Q20: Please tell us why you gave the map functionality this score and how you think the map could be improved.

52 respondents answered this question. A variety of comments were made on the usability and functionality of the draft Local Habitat Map, and how it could be improved. These comments, and Worcestershire County Council's response, are detailed below.

3 further comments on the useability and functionality of the draft Local Habitat Map were submitted via **consultation response method 4** (letters and emails). Although received through a different consultation method, these comments were given equal and individual consideration. They can be seen in full, alongside Worcestershire County Council's response, in **Appendix 2**.

Comment	Our response
I have been using the map for a while now and know my way around it but trying to contribute to it is a different matter altogether.	Feedback noted. Four separate mechanisms were constructed enabling users multiple options to provide narrative and spatial feedback through the Draft LNRS consultation period. This was considered sufficient for the purposes of the Draft LNRS consultation.
Some parts complicated.	The Local Habitat Map was constructed in accordance with specifications and guidance set out by DEFRA. County-level spatial datasets and supporting evidence can be complex. StoryMaps and user guidance has been provided to support users.
Because it takes time to find what you're looking for maybe it's because you haven't got the right name all location	Sites can be located using national and standardised address gazette including postcodes, by grid reference or by cross-referencing multiple Ordnance Survey basemaps.
Colour coding using the same colours as roads is a stupid mistake.	The ability to change basemap allows users to display coloured Potential Measures against different backgrounds. Noting that some colour conflicts may pose site accessibility issues we will investigate incorporation of an OS grayscale basemap.
The map didn't identify clearly, if at all, green spaces and woodland widely used by residents in Redditch	This is not the statutory function of the LNRS's Local Habitat Map. A comprehensive map of Worcestershire's woodlands can be seen in the Worcestershire Habitat Inventory ⁷ . Green spaces can be viewed using Natural England's Green Infrastructure map available at https://designatedsites.naturalengland.org.uk/GreenInfrastructure/map.aspx
Nothing wrong with map. It's IT skills that may hold some people back from using it effectively.	Noted. Detailed user guidance was provided to assist with the public consultation, and this will be reviewed when the Final Local Habitat Map is produced.
it was easy to examine the area immediately surrounding my home and the categories matched those in the LNRS	Noted and support welcomed.
Automatically populate all the measures as the map opens so people tick them off rather than on. That way measures are less likely to be missed when looking at the map.	Requiring the Local Habitat Map to load all measures on starting would cause the site to load very slowly for all users and consume significant internet bandwidth. It would also present a visually complex starting-point for users which many may find unhelpful in comparison to a more streamlined and simplified starting display. This is the function of the 'ACB' layer which speedily displays the extent and distribution of all Potential Measures and was placed at the top of the legend list to more readily locate where measures have been mapped.

7 Available at www.worcestershire.gov.uk/habitatinventory

Comment	Our response
make it clearer where NFM schemes are proposed	PM5: Natural Flood Management is a non-mapped measure. Maps illustrating priority catchments for the installation of NFM are located in the supporting StoryMap as this approach provides greatest flexibility for land holders to select discrete sites where ecological and wider environmental benefits of NFM installation can be maximised.
No reason to mark it down.	Noted and support is welcomed
Generally very easy to use	Noted and support is welcomed
We would like to see the natural england licensed areas also mapped (we note one in particular is missing in Welland that we notified you of in our last response to the LNRS draft). Also it might be helpful to have a layer for neighbourhood green spaces/neighbourhood open spaces that could be overlaid. Also one for highways owned land etc. This might help public bodies who own these green spaces to identify what biodiversity enhancements would be possible in these areas.	It's unclear what a Natural England 'licensed area' is. Otherwise, these features have not been identified as Potential Measures during LNRS development and therefore cannot be displayed within the Local Habitat Map. We will investigate opportunities to include datasets including green space within StoryMaps developed to support each Potential Measure.
* redacted text * would ask that the National Trails are added to the Habitat Map so that they can more easily be related to opportunities for nature recovery. You can access the * redacted text * shapefile on the Living Atlas here [<i>link provided</i>].	These features have not been identified as Potential Measures during LNRS development and therefore cannot be displayed within the Local Habitat Map. We will investigate opportunities to include datasets including green space within StoryMaps developed to support each Potential Measure.
I am aware of what I'm looking at and can use GIS.	Noted and support is welcomed
It was harder to use the Potential biodiversity pink shading map as it covers the street names etc, so I focussed on woodland such as Eoves Wood to find my exact location	The ability to change basemap allows users to display coloured Potential Measures against different backgrounds. Noting that some colour conflicts may pose site accessibility issues we will investigate incorporation of an OS grayscale basemap.

Comment	Our response
I found it very easy because I tried on a laptop. I know other people tried on phones or tablets and couldn't see the map. The colours and layers are very intuitive and there's enough text to explain what they relate to/what they mean.	Difficulties accessing maps using mobile devices noted and will be investigated with Worcestershire County Council's web and GIS teams. Comments on colours and layers are noted and welcomed.
It was OK, but didn't use enough to really get to grips with it	Noted and support is welcomed
Once I had got the hang of using it it contained lots of useful information. Good resources to support the use of the map.	Noted and support is welcomed
Easy to navigate, some glitches PM 23 highlighted then disappeared - could use more detail when zooming in more than 500 metres as images not clear.	Noted and support is welcomed. We were unable to replicate the disappearance of PM23. Aerial imagery available to the Responsible Authority was deemed suitable for use in strategic planning functions including development and implementation of the LNRS Local Habitat Map. We recognise that additional and site-level information may be of assistance to landowner and project managers in developing project feasibility studies and design, however this function is outside the legal scope of the LNRS's Local Habitat Map.
Would be helpful to have drop down box about what measures are already being taken in an area.	This is outside the purpose of LNRS Local Habitat Map in accordance with specification provided in DEFRA's guidance to Responsible Authorities. Nevertheless, there are opportunities to include further supporting information including examples or case studies illustrating good practice and locations of measures already being delivered in the plan area in each Potential Measure's supporting StoryMap.
The level of detail and how colours show on the map are excellent. What was less easy, (or not possible?), was to click on an area and see what was special about it. you would have to tick everything to find that out I think.	Noted and support is welcomed. This is not a function of the Local Habitat Map in accordance with specification provided by DEFRA to Responsible Authorities. The LNRS includes a Statement of Biodiversity Priorities which describes the strategy area and includes narrative on Worcestershire's distinctive landscapes and their importance for biodiversity.
The navigation of the map was excellent.	Noted and support is welcomed
relatively intuitive, map is out of date	Noted and support is welcomed. While based on best available and up-to-date datasets at time of preparation, once published the Local Nature Recovery Strategy and content of the Local Habitat Map cannot be modified until each Responsible Authority is directed by the Secretary of State.

Comment	Our response
It isn't clear how to open the map from a mobile phone. Easier to use on tablet or laptop perhaps.	Difficulties accessing maps using mobile devices noted and will be investigated with Worcestershire County Council's web and GIS teams.
It may be easier on a computer than on a phone.	Difficulties accessing maps using mobile devices noted and will be investigated with Worcestershire County Council's web and GIS teams.
Not really	Noted
Unmapped measures need to be added to the list of priority actions per location i.e. NFM actions. Would be great to identify a holding and have a list of ALL appropriate LNRS actions listed in full to help aid land management decisions in a single click of a button (time efficiencies/user ease). Maybe once a postcode is loaded, it could be identified by a marker? Also, would be beneficial/easier to have functionality to search by CPH/SBI for professional advisors.	A list of example actions capable of delivering Potential Measures is provided within each supporting StoryMap. Land holdings/SBI may change ownership, boundaries or configuration during the lifespan of the strategy however boundaries such as OS MasterMap field boundaries have been used to help underpin modelling of some mapped measure extents. The Draft LNRS's Local Habitat Map includes a query tool allowing users to click on the 'ACB' layer and return a list of Potential Measures mapped to that area; we recognise a finer level of data granularity would be helpful in designing activities at small (eg field) scales. We'll investigate the ability to increase the granularity of query tool results, so as to return PMs mapped in smaller areas.
The *redacted text* SSSI sites do not seem to have been selected for any Potential Measures.	DEFRA guidance prevents Responsible Authorities from mapping Potential Measures to statutory designated sites. PMs are not mapped to statutory APIB's unless those activities are otherwise outside the citation and management requirements of the designated site.
Well thought out and generally easy to see the extent of potential measures due to the transparency slide bar	Noted and support is welcomed
The labels on the side of the map were easy to understand and linked with the additional information provided within the LNRS. It was easy to click on individual or multiple potential measures and see where they connected, overlapped with other measures, or isolated.	Noted and support is welcomed

Comment	Our response
<p>There has obviously been a large amount of very detailed work undertaken to assemble this map. Inevitably we are looking at a very small section of the map, the area of our Parish, and it is encouraging to see that the local habitat has been analysed and included. The general layers do work, but you need to concentrate on one layer at a time to preserve focus.</p>	<p>Noted and support is welcomed</p>
<p>The map was clear and I was able to adjust its size. However I couldn't increase the size of Layers List panel on the side which I found rather difficult to read. When the 'Areas that could become of particular importance for biodiversity' tab is activated and a point in this is activated the map gives a square outlined in blue for which there is a list of Potential Measures. However many in this list will not be appropriate if the square contains sites which are already designated as APIB or if the square already contains important existing natural habitat which is not compatible with some of the listed potential measures.</p>	<p>Noted and support is welcomed.</p> <p>The ability to 'zoom-in' on layer list is controlled by web-browsers rather than being a function of the Local Habitat Map site. Noting that the size of grid squares which return a list of mapped PMs on querying the ACB can be too large to support small (eg field) scale operations, we will explore ability to reduce the size of this grid square.</p>
<p>Difficult to see some different shades of colour</p>	<p>The ability to change basemap allows users to display coloured Potential Measures against different backgrounds. Noting that some colour conflicts may pose site accessibility issues we will investigate incorporation of an OS grayscale basemap.</p>
<p>bit more confusing than the old one. when you have all habitats open (all polygons) and you click to bring up dialogue box - search information - a) it covers whole screen and obscures map b) you can't seem to close it - no closure tab and double clicking on box doesn't work</p>	<p>Clicking anywhere on the screen outside the dialogue box will close this box. The dialogue box also has an 'X' in its top right hand corner to close the box.</p>

Comment	Our response
<p>If i zoom to my village or a farm I want to be able to see what is happening already and what actions i could take to improve the environment there for nature. It is very difficult to use the map like this. I need to click on and off every layer to see if it applies. I can't toggle between the word document and the mapping. The mapping should link to the correct place in the text document so i can go straight to the measure applied in a place.</p>	<p>This is outside the purpose of LNRS Local Habitat Map in accordance with specification provided in DEFRA's guidance to Responsible Authorities. Nevertheless, there are opportunities to include further supporting information including examples or case studies illustrating good practice and locations of measures already being delivered in the plan area in each Potential Measure's supporting StoryMap.</p>
<p>Think scale is an issue and difficult to see the detail</p>	<p>Basemaps and mapped extents of Potential Measures have been reviewed by an expert Task and Finish Group and deemed suitable for use in the LNRS Local Habitat Map. We recognise that additional and site-level information may be of assistance to landowners and project managers in developing project feasibility studies and design, however this function is outside the legal scope of the LNRS's Local Habitat Map.</p>
<p>Great use of colour coding and symbology. Easy to navigate. More difficult to clear toggled layers and restart new searches. Difficult to 'dock' results and navigate.</p>	<p>Noted and support is welcomed. We agree that clearing toggled layers to restart a new search would be a beneficial addition and will explore if it's possible to integrate this feature in the Final LNRS's Local Habitat Map. The ability to 'dock' results dialogue box was investigated on project initiation and was not technically feasible using the Responsible Authority's corporate mapping platform.</p>
<p>I have no experience in this area and cannot how it could be improved</p>	<p>Feedback noted.</p>
<p>Not clear how to use it</p>	<p>Written and video user guides were provided to support users in exploring and commenting on the map.</p>
<p>The mapping is overall very useful and it is convenient that the matter description and links are provided when shapefiles are interacted with. The advanced tools are also useful and make the map much for effective to use.</p>	<p>Noted and support is welcomed</p>
<p>I really couldn't find a way to add in our fields</p>	<p>Feedback noted. Four separate mechanisms were constructed enabling users multiple options to provide narrative and spatial feedback through the Draft LNRS consultation period. This was considered sufficient for the purposes of the Draft LNRS consultation.</p>

Comment	Our response
Well constructed.	Noted and support is welcomed
Our consultation response is restricted to the spatial elements of the LNRS where it relates to part of *redacted text* landholdings.	Feedback noted.
I have limited computer literacy skills due to age and experience. I believe the map is more for professional use. I cannot say if it can be improved. I have enjoyed exploring the map but am not able to use it to make suggestions re Potential Measures.	Noted and support is welcomed
very easy to navigate	Noted and support is welcomed
Functionality overall is good. Identification of PM's should likely be more precise when viewing the ACBPIB layer, only giving recommendations for the selected point and not for the whole of the larger square polygon, as this could be confusing to landowners and result in inappropriate interventions. There should ideally be a way to toggle on the appropriate layers directly from the ACBPIB layer, rather than needing to scroll through and find them individually.	Noted and support is welcomed. Noting that the size of grid squares which return a list of mapped PMs on querying the ACB can be too large to support small (eg field) scale operations, we will explore ability to reduce the size of this grid square. The ability to toggle layers from within the dialogue box was not technically possible, however hyperlinks within the dialogue to supporting StoryMaps allows users to quickly review the extent and distribution of each mapped measure.
Our internet couldn't cope with data load and kept glitching so couldn't comment	Issues noted. Use of websites such as interactive mapping websites can require minimum internet speeds, as may be advised by your internet service provider. The Local Habitat Map has been designed to minimise bandwidth demands by ensuring that default data volumes being displayed are simplified and streamlined wherever possible.
The only difficulty was in areas with very narrow features and picking these up when at landscape scale was difficult	Balancing fine-grained detail and landscape-scale feature mapping can be challenging. Basemaps and mapped extents of Potential Measures have been reviewed by an expert Task and Finish Group and deemed suitable for use in the LNRS Local Habitat Map. We recognise that additional and site-level information may be of assistance to landowners and project managers in developing project feasibility studies and design, however this function is outside the legal scope of the LNRS's Local Habitat Map.

Comment	Our response
Scaling for detail over large landscape features	Balancing fine-grained detail and landscape-scale feature mapping can be challenging. Basemaps and mapped extents of Potential Measures have been reviewed by an expert Task and Finish Group and deemed suitable for use in the LNRS Local Habitat Map. We recognise that additional and site-level information may be of assistance to landowners and project managers in developing project feasibility studies and design, however this function is outside the legal scope of the LNRS's Local Habitat Map.
Doesn't always work well on a mobile device	Difficulties accessing maps using mobile devices noted and will be investigated with Worcestershire County Council's web and GIS teams.
Easy to build up layers to cross reference different information	Noted and support is welcomed
Some things are easy to find, others took more effort and investigation.	Feedback noted.

Summary of actions we will take to improve Local Habitat Map functionality:

- ❁ Investigate the addition of a greyscale basemap to the Local Habitat Map to allow users further choice in selecting the best option for them regarding colour contrast between basemaps and mapped Potential Measures.
- ❁ Investigate the addition of a 'clear all toggled layers' feature to allow users to clear the map of Potential Measures and re-start their session.
- ❁ Investigate higher resolution/smaller return area for ACB layer queries.
- ❁ Review and provide supporting webmap user guidance.
- ❁ Accessibility issues experienced by users when accessing the Local Habitat Map on phones or tablets to be discussed with Worcestershire County Council web and GIS team.

2.5 Feedback on mapped Potential Measures

The functionality to submit feedback on the mapped Potential Measures and the Wider Environmental Benefits (WEBs) assigned to each Potential Measure was provided via **consultation response method 3**. This enabled respondents to geographically locate their comment to individual mapped polygons on the draft Local Habitat Map.

94 further comments on the mapped Potential Measures were submitted via **consultation response method 4** (letters and emails). Although received through a different consultation method, these comments were given equal and individual consideration. They can be seen in full, alongside Worcestershire County Council's response, in **Appendix 2**.

Q21: Are the existing Potential Measures shown mapped to the right location? If not, please tell us why.

35 responses were received to this question: 20 said No; 15 said Yes.

The mapped Potential Measures in the locations where respondents answered 'no' were re-evaluated individually.

Q22: Should there be a different Potential Measure mapped to this location? If yes, please tell us which Potential Measure and why.

35 responses were received to this question: 23 said No; 11 said Yes.

The mapped Potential Measures in the locations where respondents answered 'yes' were re-evaluated individually.

Summary of changes made to mapped Potential Measures

In total, 31 comments were made by respondents to explain why they had suggested changes to mapped Potential Measures. As a result:

- ❁ Corrections were made to the mapping of **Potential Measure 26 Enhance wildlife value of older traditional orchards**, as respondents told us that whole orchards or parts of orchards had been destroyed.
- ❁ The wording and scope of **Potential Measure 1 De-culvert and re-naturalise watercourses** has been amended to better reflect comments received in consultation responses more broadly.
- ❁ The mapping of **Potential Measure 7 Create and enhance wildlife ponds and surrounding habitat in high-density and high-value pond areas** has been extended.
- ❁ The mapping of **Potential Measure 13 Enhance condition of existing woodlands for wildlife** has been extended.
- ❁ The mapping of **Potential Measure 59 Increase nesting habitat and food sources for Swift and House Martin** has been extended.
- ❁ Issues with the clarity of the mapping for **Potential Measure 19 Enhance wood pasture and parkland habitat** and **Potential Measure 20 Create new wood pasture and parkland habitat** have been resolved.

- ❁ The mapping of **Potential Measure 3 Revert land to wet grassland and floodplain meadow** has been amended.
- ❁ The mapping of **Potential Measure 12 Plant new woodlands and trees outside woodland** has been amended.
- ❁ The mapping of **Potential Measure 29 Create or enhance species-rich neutral grassland** has been amended.
- ❁ The mapping of **Potential Measure 27 Create new traditional orchards** has been extended.
- ❁ The mapping of **Potential Measure 25 Enhance wildlife value of newly created and younger orchards** has been extended.

Q23: Are the right Wider Environmental Benefits given to this Potential Measure? If not, please tell us why and which Wider Environmental Benefits should be shown here.

28 respondents answered this question: 24 said Yes; 4 said No.

Only one comment was supplied to explain a 'No' or 'Null' answer, with the respondent querying why no Wider Environmental Benefits (WEBs) had been allocated to species Potential Measures.

Our response to this query: Assigning Wider Environmental Benefits to specific species is a particularly challenging task and one where available evidence is emerging. WEBs for some species can indeed be clearly evidenced, however for many species, including those prioritised for conservation efforts at a national or international scale, formalising allied WEBs appears to be a matter which requires further academic study. As such, WEBs are provided in the context of habitat PMs only, and consideration of species and species assemblage PMs are not proposed to be 'weighted' or 'prioritised' in the same way, due to the current gap in available evidence.

2.6 Comments on the text of the written strategy

In addition to the topics covered within sections 2.1 to 2.5, comments received via **consultation response method 4** (letters and emails) included:

- ❁ Proof-reading/editing-type comments on the text of the strategy.
- ❁ Comments on the accuracy of facts and statements made within the strategy.
- ❁ Suggestions for additional text to strengthen the wording of the strategy.
- ❁ Requests for clarification on the purpose or role of the strategy and its function within plan-making, planning decision-making and development processes.
- ❁ Concerns about the ability of the strategy to bring about change and deliver the identified Biodiversity Priorities and Potential Measures.

These comments were given equal and individual consideration and can be seen in full, alongside Worcestershire County Council's response, in **Appendix 2**.

2.7 Land removed from Potential Measures mapping

Three requests were received during the consultation process to remove Potential Measures from specified areas of land.

In assessing these requests, where the best available evidence indicated landholdings held low-to-negligible opportunities for nature's restoration, the extent and configuration of mapped Potential Measures was re-evaluated and Potential Measures removed if appropriate. Where landholdings were identified to hold existing value for biodiversity or demonstrated substantial-to-moderate potential for nature's recovery (e.g. contained UK Priority Habitats or were coincident or concomitant with designated sites of importance for nature conservation), Potential Measures were reviewed and alterations made to better reflect the habitats and opportunities present.

Two requests for land to be removed from the mapping related to farmland, and these were granted once checks were completed to verify that the individual making the request was the landowner. Sites and habitats mapped as Areas of Particular Importance for Biodiversity (APIBs) were not altered and the boundaries of any APIBs co-incident with these landholdings were retained; only mapped Potential Measures were removed. The total area of land included within these requests was 141.4 hectares.

One request related to land which comprised disused and infilled settling ponds in private ownership. The land is adjacent to a Site of Special Scientific Interest and designated in the relevant Local Plan as Green Belt. The mapped Potential Measures on the site were reviewed and alterations made to better reflect the habitats on the site. This involved a change to the mapped area of Potential Measures 29 and 63 and the removal of Potential Measure 20.

2.8 Habitat Banks and Biodiversity Net Gain

Locations with mapped Potential Measures are eligible to receive an uplift in the value of Biodiversity Units delivered as part of a development's Biodiversity Net Gain (BNG) obligation if the BNG habitat creation and enhancement is consistent with the mapped measure. This is known as the 'Strategic Significance' uplift in the statutory BNG Metric and it confers +15% BNG Unit value for consistent habitat creation or enhancement activities.

We have liaised with and listened to feedback from habitat bank providers as part of the public consultation and reviewed how the mapped Potential Measures appropriately reflect BNG habitat creation and enhancement projects which are underway or planned, in accordance with paragraph 68 of the [LNRS Statutory Guidance](#).

Appendix 7: Supporting Authority Comments

All comments received from Worcestershire LNRS Supporting Authorities are reproduced here in full, alongside Worcestershire County Council's response.

Comment ID	Comment	Considerations	Action
Environment Agency	<p>Natural Flood Management</p> <ul style="list-style-type: none"> ❁ Measure is non mapped. Is this reflective of other agency NFM? ❁ What weight does an NFM measure have vs including in the wetland, etc. sections as a benefit of doing? ❁ Carrant as a priority? (P48) Environment Agency (EA) questions using this one above others. Is this as it is in the cross boundary working? In terms of NFM River Isbourne is a higher priority. ❁ Kyre Brook ok as an NFM priority, but evidence not there (p48) 	<p>Clarification received from EA that LNRS across England varied on whether NFM measures were mapped or non-mapped.</p> <p>Mapped and Non-Mapped PMs have the same significance/weight.</p> <p>Unmapping PM5 was about reducing ACB coverage, as NFM areas in Worcestershire are prioritised by catchment.</p> <p>Carrant Brook, River Isbourne and Kyre Brook catchments are all NFM priorities for Worcestershire Working with Water project</p>	<p>NFM prioritisation explained in PM5 Storymap - EA happy with this approach.</p> <p>Carrant, Isbourne and Kyre to all remain Storymapped as NFM priorities for Worcestershire.</p> <p>No further action.</p>
Environment Agency	<p>Water Quality</p> <p>Buffer strips along watercourses (should also include commentary on ditches, etc. within the main document- unmapped.)</p>	<p>The Wider Environmental Benefits text on water quality is referencing the wording of PM2: create riparian buffer zones.</p> <p>'Significant' ditches are mapped in PM2 but ditches aren't currently referred to in the wording of the measure.</p>	<p>Add 'alongside watercourses and ditches' into wording of PM2.</p>
Environment Agency	<p>Barriers/fish passage</p> <ul style="list-style-type: none"> ❁ Include commentary on increasing sediment movement/natural processes? Barriers do more than prevent fish movement! ❁ Although we are aware of barriers on the Dowles Brook that we would like to remove, after internal EA discussions please can we remove this as an EA priority (p50)? We would advise that the Stour is a higher priority. 		<p>Agreed. Additional commentary on sediment movement/natural processes to be added into PM62 Storymap and into Wetland Habitats section on p65 of main strategy.</p> <p>Remove reference to Dowles Brook being a priority for barrier removal. Add reference to removal of barriers on the Stour into text.</p>

Comment ID	Comment	Considerations	Action
Environment Agency	<p>Carbon sequestration</p> <p>(p 39) Peat mentioned. “all LNRS in suitable areas should seek to identify locations for peat restoration and appropriate management”. Are measures made in Worcestershire around the Peat we have (e.g. Feckenham, Severn Stoke, Crowle, Lickey etc). Need to link to the water environment (NFM and water quality as well as drought alleviation). Measures could include restore hydrology, block drainage features, revegetate bare patches to slow the flow of water. Identify and reduce inputs from surrounding land use to restore natural ecological conditions. EA has a layer showing Peaty soils.</p>	<p>Agreement with EA that their Peaty Soils Location map provides the best representation of peat habitat in Worcestershire.</p>	<p>Peat will be included within targeted PM8 mapping (clarification that SSSIs containing significant peat habitat e.g. Feckenham Wylde Moor will not have measures mapped to them).</p> <p>Add peat section and new interactive location map into PM8 Storymap.</p>
Environment Agency	<p>Water and Wetlands Theme</p> <p>(p53) Biodiversity priority- improve morphology of rivers and streams (top bullet): Measure needed around river restoration, reprofiling, allowing channel (and sediment) movement, creating backwaters and meanders, reinstalling paleochannels. Fish spawning/refuges, habitat for invertebrates and plants, making space for water (NFM, drought resilience). At present this doesn't come through strongly.</p>		<p>Agreed. Title and wording of PM1 to be amended to focus on river restoration. Deculverting will remain as part of this but no longer as the primary focus. Culverts will continue to be mapped under PM1 where removal/widening/habitat enhancement would be beneficial.</p> <p>More detail re river restoration to be added into PM1 Storymap. Suggested case studies for PM1 include Duck Brook, Sanders Park and Kyre Brook (variously EA, NWWM and SRT).</p> <p>Additional projects focused on river restoration to be added to LHM within PM1.</p>
Environment Agency	<p>River Stour</p> <p>Is EA and Catchment Based Approach (CaBA) priority catchment to improve for people and wildlife. This would tie into the CaBA vision. Priority to include Stour as a CaBA priority catchment for the partnership</p>	<p>LNRS cannot map the entirety of the Stour catchment - would be too much coverage.</p> <p>Isn't within LNRS scope to set priorities for the CaBA partnerships.</p> <p>Stour is flagged as high priority in landscapes important for biodiversity section and in cross-border section for Worcs/West Mids.</p>	<p>Agreed to raise profile of Stour corridor more, highlighting issues and current action.</p> <p>EA to provide content on River Stour to be added to Wider Environmental Benefits water quality section.</p> <p>Case study on Stour to be added to PM4 and/or PM62 Storymap.</p>

Comment ID	Comment	Considerations	Action
Environment Agency	<p>INNS on River Avon</p> <p>River Avon not referred to on pages 48 or 49 – important to refer to presence of INNS floating pennywort and the Catchment Action Group formed in this stretch of the Worcestershire Avon (i.e. Tewkesbury to Eckington Bridge). Important to raise awareness in LNRS as pennywort can be spread further across Worcestershire LNRS due to the Avon being navigable.</p>		<p>Agreed. Add e.g. of floating pennywort on River Avon into wetlands paragraph where INNS are mentioned.</p> <p>Case study on managing invasive non-native plant species to be added to PM4 Storymap to include citizen science/involvement on River Avon.</p>
Environment Agency	<p>ALaN PMs/targeting</p> <p>I think some of the measures will need further targeting or aren't appropriate as mapped measures as it appears a huge amount of the strategy area is mapped, but NE, etc can advise on these. E.g. PM45 Reduce artificial light in the countryside – it is likely that this would be equally beneficial across most of the countryside and perhaps would be better for only specific areas with particularly sensitive species to be mapped. E.g. PM46 – Reduce the impacts of artificial light at night on wildlife within the built environment - maybe better a planning policy? Could PM45 and PM46 be one measure?</p>	<p>Acceptable coverage levels have been discussed comprehensively with NE. WCC feels an acceptable balance has been struck which is under the recommended coverage threshold.</p> <p>If specific targeting of measures is required these should be identified and alternative proposals made.</p> <p>With regard to PM45/46, this was subject to extensive stakeholder discussion at specialist task and finish groups which confirmed the measure was 1) designed to address eco-network cohesion and food web resilience (hence habitat condition enhancement) and therefore not species-specific, 2) would be most effective when targeted at specific locations where benefit could be maximised, and therefore met the requirements of being a mapped measure, and 3) a non-mapped (supporting) measure is also proposed in addition to rather than instead of PM45/46. See: Supporting Activity 16 p107.</p> <p>Task group also recommended different measures needed to be described for ALaN in the countryside as opposed to in the built environment - these two could be amalgamated, but the combined measure would be very lengthy, and speak to different audiences. The combined PM would not be straightforward or streamlined.</p>	<p>Comments addressed by PM45 and 46 Storymaps. No change to mapping.</p>

Comment ID	Comment	Considerations	Action
Environment Agency	Water quality Should we have WFD status of rivers mapped? This could help focus more, e.g. poor areas.		Agreed. Add WFD status interactive map and text into PM4 storymap.
Environment Agency	Water Resources Why aren't groundwater zones mapped? Again, is this consistent across areas		Agreed. Add groundwater zones interactive map and text into PM4 storymap. Data available on Catchment Data Explorer.
Environment Agency	PM1 - De-culvert and re-naturalise watercourses Current mapping is difficult to see (due to blue dots mainly located around the motorway). Why does this measure only appear to include Highway's motorway list of priorities (i.e. outfalls)? Should the title of this measure be reworded to reflect this (e.g. priority outfalls)? Or consider including more data (e.g. heavily modified waterbodies).	PM is mapped to culverts that would benefit from widening and/or habitat enhancement, not outfalls.	Addressed by proposals for amendments to wording and mapping of PM1. Heavily modified waterbodies - highlight these within PM1 Storymap and what the issues are. EA to provide any other project locations for river restoration that could be mapped under PM1.
Environment Agency	PM2- Riparian buffer zones Covers a wide area, national suggest further targeting. Are there species that could benefit from the buffer e.g. water vole, fish, crayfish - where we could link the two to limit the area? Similar to above, include poor WFD status area? In text, could we include buffer around ditches too?	PM2 doesn't add much to coverage as largely co-incident with PM8 and/or PM41. 'Significant' ditches are mapped in PM2 but ditches aren't currently referred to in the wording of the measure.	No change to mapping of PM2. Add 'alongside watercourses and ditches' into wording of PM2.
Environment Agency	PM3 - Revert land to wet grassland Overlap with riparian buffer- which is priority?	Prioritisation of measures using Wider Environmental Benefits explained. PM2 and PM3 are not mutually exclusive.	No change to mapping of PM3.

Comment ID	Comment	Considerations	Action
Environment Agency	<p>PM4 - Protect and improve water resources</p> <p>Some confusion around this as think was mapped at time of panel but in LNRS document it's non-mapped. National EA comment that it appears targeted and first they've seen for water resources and +ve re nature-based solutions consideration. However, local officers unclear on origins, potential error e.g. south of Drakes Broughton. Would expect more protection in Bromsgrove/Redditch area and the aquifer around Kidderminster area. Need to ensure it includes examples of how to create or enhance habitats to protect and improve water quality/availability.</p>	<p>Clarification that PM4 is now non-mapped.</p> <p>Clarify with EA if PM4 Storymap explains the measure sufficiently.</p>	<p>EA happy with measure wording and non-mapped status.</p> <p>Case studies and additional mapping content to be included in PM4 Storymap.</p>
Environment Agency	<p>PM8- Create and enhance wetland habitats</p> <p>Think this layer is useful and good to link with water resources and NFM. National links to PM09 too- "whilst these are quite extensive areas, the wording of the measure should avoid incentivising action that wouldn't have impactful nature recovery benefits"</p>		<p>Local EA team happy with these measures. EA to clarify with national team if there are any outstanding concerns/queries about either PM8 or PM9 wording or mapping.</p>
Environment Agency	<p>PM17 Enhance condition of hedgerows and PM18 Increase numbers of hedgerow trees</p> <p>Not a priority but if need to reduce number of measures could these two be merged?</p>	<p>Discussed but not a priority to action.</p>	<p>No change</p>
Environment Agency	<p>PM36 Protect soils from erosion</p> <p>Could this be mapped? Erosion risk could be worth looking at? Priority for [removing] cultivation in steeper areas near watercourses where runoff could be high?</p>	<p>PM36 Storymap sets out modelling methodology for the identification of high-risk areas for soil erosion.</p>	<p>PM36 Storymap to be enhanced by turning existing static map of high-risk areas into interactive map with 1) high-risk areas, 2) Grade 1 ag land and 3) flow pathways.</p> <p>Contact University of Worcester for production of case study for PM36.</p>

Comment ID	Comment	Considerations	Action
Environment Agency	<p>PM38 Wildlife habitats within the built environment</p> <p>Does this measure need to be mapped? A general measure that could/should be applied everywhere</p>	<p>Having this as a mapped measure responds to requests of stakeholders and particularly requests made by members of the public, planning officers and locally elected members.</p> <p>This is also a more effective and beneficial measure if targeted in particular locations (some components cannot be applied or applied with impact as effectively as they might be if targeted in certain locations).</p> <p>Doesn't cumulatively add to LHM coverage total as a stacked measure, so its removal wouldn't reduce overall ACB coverage.</p>	No change
Environment Agency	<p>PM48 - Recovery of water vole population</p> <ul style="list-style-type: none"> ✿ Spatial mapping looks well targeted ✿ Current mapping is difficult to see (i.e. currently have to zoom into locations that local knowledge know where records currently are) ✿ Suggest colour change – pink is difficult to see next to the housing estates ✿ Would be useful to get the watercourses named when a layer is selected ✿ National comment – ensure habitat creation (including creating new wetland and watercourse habitat), habitat enhancement and mink control is included in details about the measure in the statement of biodiversity priorities 	Change of colour on LHM would break cohesion with nested measures/priorities.	<p>Amend wording of PM49 to also include habitat creation and enhancement.</p> <p>Add Supporting Habitat Potential Measures for all species into the datasheets.</p> <p>Add info on each of the mapped watercourses into PM49 Storymap.</p> <p>Add Waterlife Recovery Trust case study on mink control into PM49 Storymap.</p>

Comment ID	Comment	Considerations	Action
Environment Agency	<p>PM56 – Recovery of white-clawed crayfish (WCC)</p> <ul style="list-style-type: none"> ✿ Good to see mapping targeted. However, missing records in the Wyre Forest? ✿ Question the wording “if successful methodology is created, removal of signal crayfish” – might be unrealistic for lifetime of the strategy? ✿ The measure currently only includes areas with WCC – so should be reworded to increased biosecurity, continued monitoring and habitat enhancements (e.g. creation of ARK sites, adding woody material, fencing river banks off from livestock, planting riparian trees) ✿ If want a measure related to signal crayfish = signal crayfish data should be mapped – so that if successful methodology was ever created then Worcestershire would have the data to go ahead and remove signals 	<p>Can't map WCC recovery to Dowles as duplicates SSSI Management Plan/Views About Management.</p> <p>Potential 10-year lifespan of LNRS means method to remove Signals may well become available.</p> <p>Now accepted that Signals are in most watercourses.</p>	<p>Amend PM57 wording.</p> <p>Add information to PM57 Storymap to cover: ARC sites, what are these, case study; importance of survey work as WCC may exist in isolated, previously unrecorded populations; ID guides on the different crayfish species; use of INNS mapper to report non-native sightings.</p>
Environment Agency	<p>PM62- Remove barriers to migratory fish passage</p> <ul style="list-style-type: none"> ✿ some of these have passage (or may be removed) (include a note to assess the barrier status) e.g. Diglis is present still. ✿ National pleased to see this included. 	<p>Locations mapped are those provided by EA.</p>	<p>No change to priority barriers currently mapped.</p> <p>Add to PM57 Storymap to reflect: there will be more barriers than are currently mapped, more being found all the time; landowners can notify EA if they have a barrier and would be happy for removal/modifications.</p>
Forestry Commission	<p>Chapter 1 Introduction</p> <p>Page 10: Introduction – like the inclusion of who's been involved.</p>		<p>Support noted and welcomed.</p>
Forestry Commission	<p>Chapter 2 State of Nature in Worcestershire</p> <p>Page 12: Like the way the area description is themed through the 'state of nature'.</p>		<p>Support noted and welcomed.</p>

Comment ID	Comment	Considerations	Action
Forestry Commission	Wooded habitats Page 14. Needs the updated National Forest Inventory (NFI) woodland data that includes Trees Outside Woodlands (TOW) and orchards. Although I see orchards have their own paragraph so without the orchard data woodland & trees outside woodland cover ?%		Agreed. Add total canopy cover and TOW statistics into this section (now p22). Retain orchards as separate paragraph but move into wooded habitats section (now p23).
Forestry Commission	Worcestershire's land use Page 17. There is good coverage of farming economics, but none on forestry. Could this be added?		Agreed. Add forestry statistics into this section (now p26).
Forestry Commission	What is driving biodiversity loss? Page 27. Good to see +deer and grey squirrel included here.		Support noted and welcomed.
Forestry Commission	Other environmental plans and strategies Page 29/30. No mention of Forest Enterprise forest design plans.		Agreed. Add Forest Plans into this section (now p42/43). Use Wyre and Wyre Outliers Plan as e.g.
Forestry Commission	Carbon sequestration Page 39. End of first paragraph – please add: Additionally, productive woodlands, where timber is used in construction or other uses with a significant lifetime is another important contribution to carbon storage. I would also like to see the figures included for carbon sequestration in woodlands as it does for arable land and floodplain meadow.		Agreed. Add suggested text and further statistics into this section (now p57).
Forestry Commission	Wooded habitats Page 45. I would like to see acknowledgement of mixed productive woodland.	Doesn't necessarily mean conifer. Woodlands that are good for biodiversity and timber production.	Agreed. Add text to p66.
Forestry Commission	Chapter 3.6 Page 47: The landscape scale & cross border section is the best I have seen.		Support noted and welcomed.

Comment ID	Comment	Considerations	Action
Forestry Commission	<p>Mixed productive woodland</p> <p>Page 54: If we are to encourage land use change, we have a far greater chance if there is economic viability. Worcestershire potentially has a real opportunity for wildlife-rich lowland productive woodland (37% of LNRS area is low sensitivity land). This is land use change on poorer quality agricultural land. So, FC would like to see a measure around mixed productive woodland, which addresses resilience, carbon sequestration and storage, and forestry as a delivery mechanism for nature recovery alongside growth.</p>		Wording referring to biodiverse, mixed productive woodland added to existing PMs 12 and 13.
Forestry Commission	<p>Local sites network</p> <p>Page 56. I assume this priority [Biodiversity Priority 32] is based around existing sites, as DEFRA outlined 'priorities and measures are not about new designations.</p>	<p>Concern around the use of wording 'increase the number of Local Sites...' in Biodiversity Priority 32 (Increase the number of Local Sites that are in positive conservation management with habitats in good or recovering condition)</p> <p>PMs41 and 42 already refer to 'and new sites designated since LNRS publication'</p> <p>If we change the wording of the priority to say EXISTING sites, this will put it at odds with the wording of the nested PMs.</p>	<p>Change wording of Biodiversity Priority 32 to read: Increase the proportion of Local Sites that are in positive conservation management with habitats in good or recovering condition.</p> <p>Add text to p15 amendments to 'purpose of strategy' section: 'An LNRS does not create new site designations'</p>
Forestry Commission	<p>Disease-resistant elm</p> <p>Biodiversity Priority Data Sheets: Page 11: Potential measure 18. 'particularly disease resistant elm'. My understanding is that at present there is no guaranteed disease resistant elm.</p>		Agreed. Amend language of PM18 to refer to highly Dutch Elm Disease (DED) resistant elm (and not English elm as currently).
Forestry Commission	<p>Dormouse</p> <p>Biodiversity Priority Data Sheets: Page 32: Individual species - Dormouse: Do not clear understory in winter and do not clearfell in dormouse locations. LNRS should not dictate to landowners.</p>		Wording of PM 51 amended. Case study on management at Ribbesford to be added to PM51 Storymap.

Comment ID	Comment	Considerations	Action
Forestry Commission	Conflicts between woodland and grassland mapping List of locations provided where PMs 3, 29, 30 or 31 have been mapped over woodland.		All mapping discrepancies corrected.
Forestry Commission	Woodland incorrectly mapped List of locations provided where woodland incorrectly mapped as ASNW or PAWS.		Datasets used for the mapping of ASNW and PAWS and for targeting PMs 10 and 11 reviewed.
Natural England	PM14 Increase tree cover in the farmed landscape This shouldn't be at the expense of existing priority habitat or those with potential to restore to Priority Habitat.		Agreed. Amend storymap to flag this.
Natural England	PM29 Create or enhance species-rich neutral grassland Periodic disturbance is fine on some grasslands such as acid and calcareous but wouldn't want to be doing it on lowland meadows.		Discussed and wording amended.
Natural England	PM30 Create or enhance species-rich acid grassland and lowland heathland Current text says Allow for periodic disturbance to make areas of bare ground suitable for use by invertebrate species or by plant species that are intolerant of competition. Should be amended to say Particularly on sandy soils, allow for periodic disturbance.....N.B. should avoid peaty soils. Seek any and all opportunities for hydrological restoration. Many sites are drained and/or affected by abstraction. Restoring mire features within in the wider heathland mosaic is crucial. Possibly hydrological restoration should be more of an overarching measure. And could be wider e.g. around restoring natural processes and ecosystem function, as far as possible. For example I note there is reference to artificial hibernacula for Adder. I don't disagree with this, but should be seen as a stop gap measure whilst we get things better overall. I do really like that this acknowledges the link across counties etc – good stuff.		Agreed. Add wording into PM30 to expand on inclusion of 'fen' within habitat mosaic sentence, to refer to hydrological restoration and importance of acidic mire habitats (rare in Worcestershire).

Comment ID	Comment	Considerations	Action
Natural England	<p>PM25 Enhance wildlife value of newly created and younger orchards</p> <p>Should refer specifically to traditional orchard. Would benefit from additional wording: Enhance wildlife value of newly created and younger orchards by carrying out formative pruning, protecting trees from pest damage, and controlling grass and scrub at the base of trees so that young trees reach older age. Manage the orchard without the use of chemicals and enhance the habitat around the trees through the creation, restoration and management of associated habitats such as hedgerows, species-rich grassland, scrub and ponds.</p>		Agreed. Amend PM25 wording.
Natural England	<p>PM27 Create new orchards</p> <p>Should refer specifically to traditional orchard. New orchards should have vigorous rootstocks and appropriately spaced trees. This is essential for creating a habitat mosaic. Pershore orchards have smaller plum trees so you could add in a note about distinctive plum orchards in the Vale of Evesham, but they are still widely spaced to allow for ground flora.</p>		Agreed. Amend PM27 wording.
Wyre Forest District Council	<p>Brown hare</p> <p>Species is not represented despite being a UK priority species decreasing in Worcestershire (Hare Conservation Trust).</p>	Following the Defra guidance on species prioritisation Brown Hare was categorised as Category A. The species is Least Concern on the IUCN Red List, is not on the Mammal Society threatened mammals list and Worcestershire does not support a nationally important population. Only species requiring bespoke measures beyond the creation and enhancement of habitat were selected as LNRS priorities.	Case study on managing habitat for farmland mammals to be added to PM34 Storymap to raise awareness of Brown Hare as a species.
Wyre Forest District Council	<p>Stour corridor</p> <p>Could be considered as a landscape important for biodiversity.</p>	Stour Valley is already included on page 29 of the strategy within the section 'Landscapes important for biodiversity: river floodplains'. The importance of the River Stour and its corridor is also flagged on pages 30, 65, 74 of the strategy.	WFDC to provide a site boundary for the new Stour Valley Country Park. PM mapping to be reviewed in this area to maximise coverage of mapped measures.

Comment ID	Comment	Considerations	Action
Wyre Forest District Council	Wet woodland The importance of invasive plant control [needs to be made clear] in term of actions.	Agreed.	Wording of PM8 to be amended to highlight importance of control of INNS to maintaining and enhancing good ecological condition of wetland sites. Case study on managing INNS to be added to PM8 Storymap.
Wyre Forest District Council	Dormouse In the actions for dormice it would be good to survey their current distribution.	Agreed.	Title and wording of PM52 to be amended to support the undertaking of localised surveys for dormice outside of the currently recorded range if suitable habitat is found to be present.
Wyre Forest District Council	Water Vole Action re water vole may be more Worcestershire site specific rather than national generic.	Clarification from WFDC that comment stemmed from concern if the PM was deliverable (mink eradication). The national mink eradication project (which began in East Anglia) is looking to move westwards and action within Worcestershire is considered to be highly possible (dependent on landowner support) within the lifetime of the LNRS.	No change
Wyre Forest District Council	Wet woodland [Need] to look at areas to create this habitat where suitability of creating [wet woodland] out values the creation of other wetland habitats.	Three Potential Measures currently support the creation or enhancement of wet woodland habitat (PMs 2, 8 and 75). Within PM8 (create and enhance a mosaic of wetland habitats) the granularity required to differentiate between where to target wet woodland habitat and where to target marsh/fen habitat at county scale is difficult to achieve with the data and modelling processes used.	Case study to be added to PM8 to illustrate what 'good' looks like for a site more suited to marsh/fen and for a site more suited to wet woodland. This should support decision-making as to which is most suitable on a site-by-site basis and what the main considerations should be.
Wyre Forest District Council	LNRS in Local Plans Why do we need local plan [wording] to require development to refer to the LNRS when nationally they need to have due regard?	The Levelling Up and Regeneration Act (LURA) provides mechanisms for LNRS to be integrated into local planning processes. Proposed changes to planning law within the Act will require local / neighbourhood / mineral / strategic plans to "take account" of LNRS. The LURA does not apply to developers directly, so specific wording on LNRS in Local Plans is desirable.	No change to LNRS. WFDC to seek to include appropriate wording on LNRS within Local Development Framework documents.

Comment ID	Comment	Considerations	Action
Wyre Forest District Council	Mapping of APIB Looking the Local habitat map in Wyre Forest District, concern exists that some areas of particular importance for biodiversity are not correctly mapped.	Further clarity provided to WFDC on definition of APIB.	No further action.
Wyre Forest District Council	Urban/urban-fringe The mapping is missing opportunities for connective habitat creation in the urban and urban fringe environments.	Opportunities need to be submitted by WFDC for consideration.	WFDC to provide specific site-based proposals.
Wyre Forest District Council	PM38 and application of BNG uplift What is the meaning [of] PM38 Increase the extent, connectedness and quality of wildlife habitats in the built environment? If a developer were to create any habitat in this area would it receive a BNG uplift? Would it not be better for the uplift to apply to specific habits in the urban area where their creation provides valuable connectivity of that habitat type?	Clarification from WFDC that concern stems from an apparent lack of incentive within wording of current PM for developers to create locally important habitats such as acid grassland within urban and urban fringe locations meaning they are likely to instead opt for easier and cheaper ways to achieve 10% gain and HSS uplift. This misses an opportunity to require development to contribute to the conservation of genuinely locally significant habitats in favour of more generic interventions.	Interactive map of soil types/geology to be added to PM38 Storymap. UKHab grassland codes to be included as a layer on the map linked to the soil types. Wording of PM38 and BNG section of PM38 Storymap to be updated to clarify that developers should deliver grassland creation that adheres to locally appropriate soil type and HSS will only apply if this is the case.
Wyre Forest District Council	Habitat mapping in the urban environment How some of the habits interact in the urban environment is either unrealistic or nonsensical. Eg scrub seems to [be] preferable throughout Bewdley town centre, calcareous creation opportunities next to lowland heath.	Error already identified whereby calcareous grassland habitats were mis-coded in DEFRA's Environmental Stewardship Scheme dataset. Agreement reached with WFDC that revised wording of PM23 (Create and enhance a habitat mosaic) addresses the concerns regarding apparent dominance of scrub habitat.	Calcareous grassland mapping error will be rectified in final version of LHM.
Wyre Forest District Council	Acid grassland Concern over acidic grassland opportunities not being fully represented on the map.	Not all acid grassland opportunities will be mapped, just highest priority sites according to mapping methodology. Additional site proposals need to be submitted if appropriate. Revision to acid grassland mapping already scheduled arising from correction of an identified data issue in LHM (see comment above regarding calcareous grassland mapping error, where habitat type should have been acidic).	Resolved with proposal for PM38 Storymap changes and correction of calcareous/acidic grassland data error.

Comment ID	Comment	Considerations	Action
Wyre Forest District Council	Road verge network Unsure [of] the role of PM41 Enhance biodiversity of non-statutory sites. Does this need to highlight strategic roads where enhancement for biodiversity adds to habitat and site connectivity?	No, PM41 is mapped to RVNRs only with regard to roads. PM47 incorporates the whole of the Strategic Road Network.	No further action.
Wyre Forest District Council	Species opportunities Some species opportunities are also unrealistic or underrepresented in the urban and urban fringe environments.	Specific concerns need to be identified and investigated.	WFDC to review boundaries of species mapping where this meets urban areas and provide specific feedback on individual measures.
Redditch and Bromsgrove District Councils	BDC are content that the latest work on the local plan is well aligned with the LNRS and habitat mapping, having worked with you and colleagues to use the most up-to-date priority habitats mapping as part of our site assessment process. Both BDC and RBC would further go on record to say that the LNRS document is well written and presented and acknowledge the caveat included in the draft consultation document that an aim of the LNRS is not to stop new built development occurring; this is an important element for stakeholders and the general public to understand in the context of new local plans being prepared for both BDC and RBC.	Support noted and welcomed.	None
Redditch and Bromsgrove District Councils	Both Councils are also supportive of the potential measures and acknowledge that these should be read in the context of the overall aims of the LNRS and planning authorities such as BDC and RBC having regard to the LNRS in both plan-making and development management decision-taking.	Support noted and welcomed.	None

Comment ID	Comment	Considerations	Action
Malvern Hills and Wychavon District Councils	<p>The introduction of Local Nature Recovery Strategies (LNRS) is a welcome step in improving how we plan for the environment and reverse the decline of biodiversity. Worcestershire is one of 48 'strategy areas' which cover the whole of England. Worcestershire County Council (WCC) is the 'responsible authority' charged with leading the collaborative LNRS preparation process in Worcestershire. MHDC and WDC are both identified as 'supporting authorities' (together with neighbouring districts and Natural England) so it is important that effective duty to cooperate discussions are undertaken between them regarding strategic matters. Both WDC and MHDC are committed to engaging further on the Local Nature Recovery Strategy consultations and are committed to ongoing collaboration as part of our joint statutory requirements and WDC and MHDC were fully involved in the production of the draft LNRS.</p> <p>The LNRS is required to include a statement of biodiversity priorities for the strategy area and a local habitat map. The statement of biodiversity priorities must include a description of the strategy area and its biodiversity, a description of the opportunities for recovering and enhancing habitats and species, the priorities for recovering or enhancing biodiversity, and proposals for potential measures relating to those priorities. The consultation asks for feedback on:</p>	Noted and LNRS support is welcomed	None

Comment ID	Comment	Considerations	Action
Malvern Hills and Wychavon District Councils	<p>❖ if the right priority habitats, species and environmental issues have been identified for Worcestershire</p> <p>WDC agrees that the long-recognised priority habitats across Worcestershire are covered in the LNRS and given due prominence. We also recognise that the threats and issues facing the natural environment are clearly conveyed. WDC also recognises that the criteria for individual species and species assemblage inclusion in the LNRS means that many species from the Worcestershire Biodiversity Action Plan (WBAP) are not included for individual action as part of the LNRS, however many of the WBAP species will benefit from measures proposed to enhance and create habitats.</p>	Noted and LNRS support is welcomed	None

Comment ID	Comment	Considerations	Action
Malvern Hills and Wychavon District Councils	<p>🌱 if the right 'Potential Measures' (suggested on-the-ground actions for recovering nature) have been mapped in the right locations</p> <p>The mapped measures appear to be correctly located. WDC does have some concerns over those mapped to urban areas which may lack some of the nuance of those mapped to more rural areas.</p> <p>PM38, for example, covers most larger urban areas and may not take into account pockets of high value or distinctive existing habitat. The habitats proposed under PM38 will lead to a more nature-rich and diverse urban environment but opportunities to retain, enhance and create more locally distinctive habitats should also be valued through the strategic significance conveyed through delivering the measure.</p> <p>Recognising that these habitats may not be formally identified until initial pre-development survey, there is difficulty in assigning a set of UKHab codes that will support the Strategic Significance uplift in the Statutory Metric. To prevent inadvertent penalties for enhancing and expanding existing locally important habitats, exploring the implications of using the habitat distinctiveness score used in the Metric to secure the uplift for applications that involve enhancing and expanding existing habitats of medium distinctiveness or higher could be worthwhile.</p> <p>As the Local Habitat Map is seen as driving much of the engagement with the Local Nature Recovery Strategy, the delivery of non-mapped measures may be more difficult to secure as by their nature, they will not show as location-based measures. The non-mapped measures are as much a priority as those that are location specific and ensuring that they are given due prominence alongside mapped measures will lead to well-rounded LNRS delivery.</p>	<p>Comments noted and suggestion is welcomed. We agree that site-specific surveys will be required to identify high value existing habitats within urban and peri-urban areas. The requirement to undertake site-specific surveys is articulated both within the Strategy and supporting guidance on the website and Local Habitat Map. Additional focus on higher distinctiveness habitats can be included in the Final LNRS and StoryMap content.</p> <p>A concern raised by other consultees is the risk, in listing all relevant UKHab target codes for Strategic Significance uplift in Worcestershire's built environment, that locally inappropriate habitat assemblages might inadvertently be promoted. A non-mapped approach was initially considered, however this fails to provide the spatial detail supporting the targeting of locally appropriate habitat groups, for instance: a non-mapped measure may fail to promote acid grassland conservation opportunities where existing soil type permits.</p> <p>We will provide further supporting information (e.g. target UKHab codes aligned with known soil-types mapped within PM38) through the StoryMap supporting delivery of PM38. This will provide additional supporting information on the relevant UKHab codes for Strategic Significance uplift which are locally appropriate and spatially targeted, avoiding penalising or incentivising locally inappropriate habitat assemblages, whilst also promoting the conservation of existing higher distinctiveness habitats.</p>	<p>Wording added to PM38 to encourage the conservation and enhancement of existing high distinctiveness habitats in the built environment, focusing on locally distinctive grassland.</p> <p>Develop additional resources in PM38 StoryMaps to ensure locally appropriate UKHab codes are spatially targeted and promoted.</p>

Comment ID	Comment	Considerations	Action
Malvern Hills and Wychavon District Councils	<p>🌱 about any changes you think we should make to the wording of the suggested Potential Measures</p> <p>Describing the changes that successful delivery of individual measures will bring about may also be helpful, whether in terms of species recovery or habitat enhancement so that partners and stakeholders involved in measure delivery have a clear vision of the positive impact and outcomes their actions will deliver.</p> <p>For PM38 'Increase the extent, connectedness and quality of wildlife habitats within the urban environment' WDC and MHDC suggest that further wording added to the Potential Measure description as a bullet point should be included to make the aims of this measure clearer and more robust:</p> <p>[...] As a minimum, decision-makers should seek to: Enhance and expand existing area and linear habitats with medium distinctiveness or higher (as defined by the Statutory Biodiversity Metric).</p>	<p>At the request of the DEFRA Panel, details on Potential Measure outputs and outcomes were removed from the body of the main strategy, to ensure the document was streamlined to a minimal size and easily legible. This detail is provided through each Potential Measures' supporting StoryMap, which aims to illustrate examples of good practice in Potential Measure delivery, and signpost to relevant good practice guidance for a clear vision of the positive impact and outcomes each action should aim to achieve. We're supportive of the additional bullet point clarifying the aims of PM38 specifically for decision makers.</p>	<p>Wording of PM38 amended</p>

Comment ID	Comment	Considerations	Action
Malvern Hills and Wychavon District Councils	<p>🌱 how easy the Local Habitat Map is to use and understand</p> <p>The Local Habitat Map is clear to use from an officer perspective and contains much useful information with clear links back to the LNRS. From a planning policy position, once the local plan is adopted, it would be useful if measures and outcomes linked to local plan policies could also be cross-referenced here (and vice versa with local plan mapping). This would ensure a joined up approach and help guide users to the correct sources of information to ensure effective delivery.</p> <p>It would be useful if the Local Habitat Map could be filtered by responsibility as well. There are many outcomes to sort through and having a filter to show what could be done by the responsible authority, the supporting authorities, landowners, or at a community level may make it easier for laypeople to engage and to report any interventions.</p> <p>A self-reporting button, similar in function to the consultation survey button, so that users can report interventions undertaken themselves would also be very useful to demonstrate where actions supporting proposed measures have taken place within the plan period.</p>	<p>Thank you for the positive feedback on LHM use and intelligibility. Once published the LNRS must not be edited throughout its 3-10 year lifespan until instructed by the Secretary of State for Environment, Food and Rural Affairs, and so risks becoming out-of-date if, on publication, the LNRS includes cross-reference to those Local Development Plans which have been successfully adopted at that point-in-time. Nevertheless, we agree that closer cross-referencing to LDPs will help clarify policy context for users, and can include signposting to adopted Local Development Plans in each relevant StoryMap.</p> <p>Feedback on LHM indicates that further additions to layers and filters would be undesirable for many users. Additional user guidance has been provided on our website targeting advice to key stakeholder groups.</p> <p>LNRS reporting guidance has yet to be published by DEFRA and until reporting data standards and advice is available it may become counter-productive to develop reporting mechanisms. We agree a 'self-reporting' button may be a useful addition in the future and will consider this as part of any future improvements once statutory reporting requirements and guidance are better understood.</p>	<p>Review StoryMaps and include signposting to relevant Local Development Plans (e.g. SWDPR) once adopted.</p>

Comment ID	Comment	Considerations	Action
Malvern Hills and Wychavon District Councils	<p>Local Plan Policy</p> <p>The timing of the draft LNRS postdates much of the evidence and policies in the SWDPR, as submitted to the Secretary of State for examination in 2023. Through the examination process and through Duty to Co-operate discussions with Natural England and Worcestershire County Council, proposed modifications have been put forward to ensure policies within the plan support delivery of the draft LNRS and BNG (Please see Appendix 1 attached to this response). Furthermore, the strategic allocations within the plan have been a landscape-led approach and must deliver high levels of green infrastructure, a diverse range of open spaces, and high levels of biodiversity net gain, as part of their policy criteria.</p> <p>Specific policy criteria has also been included in SWDPR 07 Green Infrastructure to mitigate the impact of development on the Malvern Hills SSSI. Working in partnership with Natural England, the Malvern Hills Trust, the Malvern Hills National Landscape Board, and neighbouring planning authorities, the Malvern Hills Mitigation Strategy will support the delivery of ‘Supporting Activity 18-Mitigate impacts of visitor pressure on sensitive sites’.</p> <p>Whilst hearings have been completed, the SWDPR is currently awaiting the Inspector’s Report and will then consult on proposed main modifications to the plan. It is currently expected that adoption would then take place in Spring 2026. It is worth noting that whilst policies in the plan must have regard to the draft LNRS, the LNRS currently does not have to align with local plan policy. This may lead to some inconsistencies in application at the DM stage. In future, to ensure effective and consistent policies that align, the responsible and supporting authorities should ensure that early engagement is undertaken, including establishing procedures for monitoring outcomes effectively and reporting them to the responsible authority.</p>	Noted and we are thankful for the collaborative working between the Responsible and Supporting Authorities to date and into the future	None

Comment ID	Comment	Considerations	Action
Malvern Hills and Wychavon District Councils	<p>Effective Monitoring</p> <p>The UK Government has made an international commitment that 30% of England’s land and seas should be effectively conserved and enhanced for nature by 2030: the ‘30 by 30’ target. In preparing the LNRS and mapping suggested Potential Measures, consideration was given to how Worcestershire can contribute to this international obligation. Under the criteria for what currently counts towards 30 by 30, Worcestershire’s baseline is 3.4% of our land area. MHDC and WDC support this aim but given that many of the priorities and potential measures within the LNRS are voluntary, unmapped, and not recorded or monitored, it is unclear how WCC will demonstrate that the LNRS is helping to achieve this commitment.</p> <p>The delivery of Mandatory Biodiversity Net Gain through the planning system is one mechanism where reporting of actions that support measure delivery can be monitored and quantified. Once the LNRS is adopted, Local Planning Authorities will be able to monitor and record those applications where Strategic Significance uplift is appropriately applied to habitat creation or enhancement proposals.</p> <p>It would also be useful if there were opportunities for groups and individuals to report their actions via the local habitat map or LNRS section of the website.</p>	<p>Further advice and guidance from DEFRA on LNRS monitoring requirements is awaited. Development of monitoring and reporting mechanisms before this guidance is available may be presumptive. We agree that opportunities such as a ‘self-reporting’ button inside the LHM may be a useful addition, and will consider this as part of future LHM improvements and Biodiversity Reporting processes once statutory LNRS reporting requirements and guidance is better understood.</p>	None
Malvern Hills and Wychavon District Councils	<p>Evidence Base</p> <p>MHDC and WDC would like to be kept informed as the evidence base supporting the draft Local Nature Recovery Strategy is updated so that we can continue to work together proactively and address issues as they arise.</p>	<p>Noted and the collaborative working between Responsible and Supporting Authorities is welcomed.</p>	None

Comment ID	Comment	Considerations	Action
Malvern Hills and Wychavon District Councils	<p>Duty to Cooperate</p> <p>We acknowledge and appreciate that Worcestershire County Council has previously engaged constructively with the WDC and MHDC as part of the Council's Duty to Cooperate for the SWDPR. WDC and MHDC are committed to further discussions as both the draft LNRS and SWDPR progress to comply with on-going requirements associated with the Duty to Co-operate and aim to work together collaboratively to address and mitigate issues.</p>	Noted and the collaborative working between Responsible and Supporting Authorities is welcomed.	None
Malvern Hills District Council	For Hallow Fields, I thought it might be useful to have a map of the land showing specifically where our recommendation for each PM would be, based on the Management Plan that we have for the site. I have attached this [map supplied] and can send the shapefiles if preferred. I do appreciate that based on your datasets you may choose to continue with the recommendations as already mapped, and I am less concerned about this for where I have suggested PM27 creation of new orchard habitat on this map, however, I feel it is important that both the inland fields away from the river should be mapped as PM29 creation of species rich neutral grassland, particularly the northern one, where it is remnant grassland already. Currently too much of the site is under PM12 and some of the ponds have been missed under PM07. The whole site should also be mapped under PM08.	Review PM mapping for Hallow Fields.	PM mapping amended.
Malvern Hills District Council	The Drive, at Collets Green – visible green space shown outlined in red in the below map [map supplied] should be mapped as PM38 and PM39.	Review PM mapping in this location.	Location added to PM39.

Appendix 2: Comments received via letter and email from all other partners, stakeholders and the public.

All 434 comments received via letter and email (not including Supporting Authority comments: see Appendix 1) are reproduced here in full, alongside Worcestershire County Council's response.

Comment ID	Comment	Considerations	Action
1	Confirm the status of Street Lighting Design Guide (SLDG), to ensure that the LNRS doesn't contradict the SLDG or vice versa and include references where appropriate.	The Street Lighting Design Guide will be appended to the 2025 Streetscape Design Guide which has been approved for publication.	Once Streetscape Design Guide is published, add links within PM45/46 StoryMaps
2	Make clear statements that lighting is not compatible with recovery or even overall biodiversity net gain. There are various studies which show light opportunistic success on the balance of the negative effects. Neither is acceptable.	PM45 and 46 StoryMaps are clear that the effects of artificial light at night are adverse for nature's recovery. Opportunistic exploitation of ALaN by some species is recognised in these StoryMaps but the overriding adverse impacts are articulated by both the proportion of species reliant on darkness and the trending declines in abundance of those species.	None
3	Understand the link between negative impact of car headlights, lights from housing and businesses and areas of recovery - not just focusing on street lighting.	The evidence base used for targeting this Potential Measure is broader than street lighting contribution alone, but the examples of good practice illustrated in PM45 and 46 Storymaps can include residential/commercial lighting.	Case studies/examples of good practice to be added to PM45 and 46 Storymaps

Comment ID	Comment	Considerations	Action
4	Recognise that nighttime pollinators are important and need to be protected from light pollution. Buglife have some excellent text available about this.		<p>Additional content to be added to PM45 and PM46 Storymaps</p> <p>Good practice guidance for consideration of nocturnal pollinators:</p> <ul style="list-style-type: none"> ✿ https://pollinators.ie/wp-content/uploads/2023/09/AIPP-Nocturnal-Guide-2023-WEB.pdf ✿ https://cdn.buglife.org.uk/2023/06/Buglife-Nurture-the-Night-Shift-In-the-Night-Garden.pdf
5	Cotswolds and Malvern Hills national landscapes were developing DarkSky policies which should be mentioned and monitored for impact if they are still proceeding.		<p>Additional content to be added to PM45 and PM46 Storymaps:</p> <p>MHAONB supplemental guidance on lighting design</p> <p>Cotswold AONB management plan policy CE5 'Dark Skies' requirement and their position statement</p> <p>Also cross-reference emerging policy SWDPR 26 and SWDPR27 which requires full consideration of development design to address ecological integrity.</p>
6	Mapping exercise is a lovely start but should bring in the lighting contours previously produced for the LED rollout to understand what level of impact County could have without wider societal changes. Although these were produced on the older conventional lighting specification, it would still be useful for sign posting to understand where there is existing lighting versus recovery proposals (appreciate this was older light sources, but it will put you in the right direction for finding issues).	LNRS must consider both public and private ALaN contributions and use of the CBAS and NASA data are the most up to date and highest resolution data available, superseding the partial and now out-of-date contour modelling of Worcestershire County Council's own streetlights.	None

Comment ID	Comment	Considerations	Action
7	Action list is put together to understand what / if anything needs to be done and where i.e. further addressing of lighting levels / shielding / CCT etc which wasn't handled as part of the LED rollout.	Recommendations relating to all sources of unwanted ALaN are set out in PM45 and 46 rather than focusing on Worcestershire County Council's contributions alone. Further specifications for street lighting will be published in the SLDG appended to the forthcoming Streetscape Design Guide.	None
8	CCT should not be provided as a first point mitigation measure due to spectral shift depending on LED manufacturer (some blue light content can be significantly different between products). With regards to highway lighting we should continue to only provide lighting where there is a clearly evidenced safety or crime reason to do so (this should align with the SLDG if it's not ready to be published), then we reduce lighting levels, control the light and only light when required. Mitigation using reduced colour temperature should be the last resort – like what we did during the LED rollout within the County.	Agreed.	Additional content to be included in PM45/46 Storymaps on the application of mitigation hierarchy and closer cross-reference to process flowchart in emerging SLDG and GN08/23
9	West Mercia Police had recognised that lighting didn't solve crime last time we spoke and interventions without other measures such as CCTV were wasteful. Maybe worth a look at in more built-up areas where biodiversity might be flourishing still - to ensure the balance is right.	This level of site-specific balancing between illumination for safety and selection of mitigation measures is beyond the capabilities or scope of LNRS to address, but good practice guidance can be signposted to inform site-and-scheme specific design decision-making.	Include reference to https://www.securedbydesign.com/guidance/design-guides in PM45 Storymap
10	Thread industry standard guidance such as GN01 Reduction of Obtrusive Light, GN08 Bats and artificial lighting into all mentions of lighting and PLG04 Guidance on undertaking environmental lighting impact assessments throughout the document.	Agreed. Noting that PLG04 is a commercial product (£123 for non-members).	Links to be added to PM45 and PM46 Storymaps
11	Reference [Institute of Lighting professionals] (ILP) House of Lords evidence: committees.parliament.uk/writtenevidence/118921/html into relevant areas of the document, for example the ILP stated. 1. The implementation of energy-efficient LED technology to reduce energy consumption and carbon emissions (linked with climate change mitigation) has unsustainable, ecologically unfriendly side effects on flora, fauna, and humans, and ultimately on biodiversity. 2. Development in areas that are intrinsically dark is the most worrying as they will often be adjacent to areas of environmental conservations, sometime Areas of Outstanding Natural Beauty (AONB) refer to Worcestershire County Council case studies in ILP GN08 Bats and artificial lighting guidance note 08/23. Where this happens even slight increases in light pollution can have drastic effects on legislated species and vulnerable nocturnal animals. 3. The evidence base for impact on protected species such as bats and their ecosystems is proven so regardless of the findings of impact on human health, we should be looking to reduce quantity of light at night to ensure that biodiversity has a chance to survive.	Agreed. Debate evidence noted.	Additional content to be included in PM45/46 Storymaps on the application of mitigation hierarchy and closer cross-reference to process flowchart in emerging SLDG and GN08/23

Comment ID	Comment	Considerations	Action
12	There should be an area explaining how WCC will engage with all residents who live within areas targeted areas of recovery are taught about the challenges regarding biodiversity and recovery so that we can learn from our mistakes. This could mean a communication strategy with news outlets – BBC news, newspapers, and social media posts – proactive sharing by politicians and consultants employed by WCC to ensure the message is communicated. This doesn't appear to this extent in the LNRS, and I believe it should be included.	Stakeholder engagement and communication will be critical components of successful LNRS delivery. The full scope of the delivery role is currently being discussed between Defra and LNRS Responsible Authorities. It is anticipated that a stakeholder engagement strategy will form part of this.	None
13	Finally, with regards to the satellite data – this is fantastic to see but I would offer that this does not remove the requirements to survey for new developments. For example, I have just concluded some work where the satellite data concluded an area was dark due to dense tree cover (obscuring line of sight issues with the Satellites). It missed some heavily lit ancient monuments which proved pivotal in proving the landscape wasn't as dark as thought.	Noted. We agree that there are limitations in application of remote-sensing data. These have been acknowledged and the use of derived analysis from datasets which include an element of remote-sensed data in the LHM, such as CBAS's SDGSAT-1 and the Habitat Inventory's Sentinel 1 data, have clearly articulated constraints for their interpretation and application. For example: "It is important to undertake site specific investigations and seek expert advice and the necessary permissions before starting work on the ground. The Local Habitat Map should not be treated as definitive but as a tool to help plan and coordinate action for nature recovery". The data is sufficiently granular to inform strategic-scale decision-making but site-specific investigations will be required to inform site management or land-use proposals.	None
14	Standing advice supplied on consideration of marine management and planning issues.	None	None

Comment ID	Comment	Considerations	Action
15	<p>Our charity are looking to take a very active role in your initiative - as you will know from our prominent contribution to the Worcs LNRS video. I have already commented on the consultations and held meetings with the parish council but wish to apply our close attention to the accuracy and opportunities in the LNRS map as far as it applies to the village. Where I have been able (on orchards wrongly categorised), I have already submitted on line comments to your team but I am struggling to add details of real new opportunities where an existing assessment has not been made to change. As two immediate examples, we have a culvert on the Laugherne Brook tributary that could be successfully bypassed to bring considerable benefits back to our watercourse and, secondly, are already implementing various improvements for migratory eels through an eel brush and rope initiative and leaky dam project being overseen with *redacted text*. It would be great to highlight these and other issues on the map and would welcome your help in achieving these aims. [Further comments made subsequent to site visit:]</p> <p>Thank you for coming to see us today and for your advice and guidance. In terms of *redacted text*, as discussed, our main focus would be on improving our Laugherne Brook tributary watercourses and wetland / boggy habitats through deculverting, silt removal and seasonal flooding with adjacent scrapes. We would be hopeful of improving habitats for water voles, waders and other wildlife and allow migratory fish, including eels, to access the upper stretches of the watercourses. The classifications on the rest of the Green need to be raised to reflect their current ecological status with regard to the heritage fruit trees, wildflower meadow, woodland and hedgerows. If we could purchase or lease the two immediately adjacent meadows, additional heritage orchards and wetland areas and scrapes, amongst other habitats, could be created.</p> <p>Elsewhere across the northern part of our parish the old orchards at *redacted text* need to be included in the map. Please let me know if you need any further information. If I can survey any more of the older orchards in the southern part of the parish and report by the end of the month, I will be in touch.</p>	<p>Corrections to habitat mapping within Martley Parish submitted for review and amendment. Proposals made for additional sites/projects for inclusion in mapped Potential Measures.</p>	<p>Accuracy of PM mapping on Martley Millennium Green reviewed.</p> <p>Project proposals added to PM1 and PM27.</p> <p>Corrections to traditional orchard mapping in Martley parish actioned.</p>
16	<p>In section 2.4 Threats and Pressures there needs to be recognition that the current Government's commitment to Environmental and Countryside Stewardship is not as generous as that of the previous government. This is leading farmers to make changes that are likely to lead to less efforts to support nature/wildlife/habitats across the county. This change needs to be acknowledged and its impact assessed.</p>	<p>Agreed. Uncertainty or disillusionment around availability, levels and targeting of agri-environmental funding is not supportive of farmers committing to action for nature recovery.</p>	<p>Text to be added to p41 of the strategy.</p>
17	<p>In the section on what is driving the loss of biodiversity, in particular that associated with orchards, there should be an explanation of how the economics of the local top fruit industry have been impacted by the requirements of the supermarkets; the cost and availability of seasonal labour in the UK; the loss of local processing capacity for jam making etc.</p>	<p>Agreed. Economic factors have had a significant role in the loss of traditional orchard habitat.</p>	<p>Text to be added to p24 of the strategy document. Section to be added to PM26 Storymap to better interpret the history and local heritage/distinctiveness of Worcestershire's orchards.</p>

Comment ID	Comment	Considerations	Action
18	The planting of the right trees in the right places in the correct densities is massively important. Keeping soil covered with living plants at all times is massively important and reducing [or shading with broad leaved trees] concrete, tarmac, roof tiles etc that re-radiate the sun's energy is massively important. The research into the importance of the water cycle that cools the planet is very advanced and we all have a part to play in restoring this system that we began altering seven thousand years ago when we started deforestation to grow crops/ livestock. Please prioritise the planting of trees and the slowing down of rain water run off in any planning for nature.	Agreed. Tree planting, slowing the flow of water, and the protection of soils are all important components of the LNRS, including the identified Wider Environmental Benefits of nature recovery (Water Availability, Flood Risk Reduction, Soil Health and Protection, Carbon Sequestration, Climate Adaptation), and multiple suggested Potential Measures.	None
19	This parish council Supports page 59 "contribute to climate change adaptation and mitigation".		Support noted and welcomed.
20	This parish council Supports the Headline Principles for the Worcestershire LNRS, page 76. The exec summary p.7 stresses the legislative strength of this document (Draft Worcestershire Local Nature Recovery Strategy) once published, but we could ask for the headline principles on page 76 to refer strongly to the legislative requirements and planning enforcement possibilities, rather than use the word 'incentivise'.	Agreed. The legal mechanisms relevant to the implementation of LNRS could be more strongly emphasised within the headline principles.	Title and text of headline principle 'Require development to bring nature into better condition' to be amended to strengthen the wording and refer both to BNG and to plan-making and development management decision-making.
21	Page 77, monitoring of outcomes should also make reference to 'supporting planning authorities in their planning enforcement work where this Strategy and the Habitat Maps have not been incorporated sufficiently by developers'.	This will not be the only use for data captured by monitoring and reporting on LNRS delivery. Text could be more explicit about improving the quality and extent of habitat and species data to inform local decision making.	Amend text of headline principle 'Enable measuring and monitoring of outcomes'
22	This parish council Supports the Habitat Map PM02 Create Riparian Buffer Zones & PM03 Revert Land to Wet Grassland and Floodplain Meadow on both sides of the River Severn at Severn Stoke village up to Clifton and asks for the expansion of this aim to include more areas to the north of our parish into Kempsey, in the absence of any other viable flood protection at present for Severn Stoke.	Mapping of PM2 and PM3 along both sides of River Severn corridor between Severn Stoke and Kempsey to be reviewed.	Support noted and welcomed. Mapping of PM3 extended in this location to maximum extent supported by hydrology and flood mapping.
23	Ref p110 "Responsible Authorities await confirmation from Government regarding the resources that will be made available to enable effective monitoring of LNRS delivery." This document could call for central government to better fund the newly forming unitary authorities in all matters and in particular in matters of climate change, nature recovery scheme delivery and monitoring	Delivery mechanisms for LNRS Potential Measures are set out in section 5.1 of the strategy. Resourcing LNRS implementation and the monitoring of LNRS delivery is acknowledged by DEFRA and Responsible Authorities as a key consideration for the delivery phase.	Text to be added to page 109 to clarify latest guidance from Defra on LNRS delivery role.

Comment ID	Comment	Considerations	Action
24	Parish Councillors request that the 'authorities that be' not to get sucked into a short-term timetable of endless reviews and consultations, which prevent longer term work being achieved - something we have seen with the SWDP.	The review and republication timetable for LNRS is at the discretion of the Secretary of State. The importance of acknowledging and not losing focus on longer-term aspirations which are not dictated by LNRS review cycles is articulated in the headline principles.	Concerns are noted and understood.
25	The term invasive species is only mentioned once (for eg, himalayan balsam p.40) and there is no longer term joined up strategy with areas upstream of Worcestershire for ridding our riverbanks of this plant that is removing the ability of other flowering native species to survive.	References to the impact of invasive species or INNS are frequent throughout the strategy e.g. pgs 9, 40, 65, 75. Potential Measure 4 suggests seeking the eradication of invasive non-native plant species from waterways. The strategy also contains 'Supporting Activity 17 Invasive Non-Native Species Strategy: Support the production of a landscape-scale strategy to enable a strategic approach to tackling INNS across Worcestershire'.	Case study on managing invasive non-native plant species to be added to PM4 Storymap.
26	Fly tipping is mentioned in passing. The simple solution to this problem is for the district councils to make the recycling facilities more accessible and receptive to waste in the first place, and for the appropriate government funding for this. This document should push for this as a significant way to achieve local nature recovery by reducing fly tipping pollution.	This is outside of the scope of LNRS.	Comment noted.
27	This parish council Supports PM03 Revert Land to Wet Grassland and Floodplain Meadow on the opposite side of the river bank to the Camp Inn and ask for the expansion of this aim, in the absence of any other viable flood protection for the small number of properties affected by flooding down Camp Lane and in Grimley village.	Mapping of PM3 along both sides of River Severn corridor at Grimley to be reviewed.	Support noted and welcomed. Land is already extensively mapped as PM8 Create and enhance wetland habitats. Action here can include restoring and enhancing further areas of wet grassland and floodplain meadow.
28	The section "What is driving the loss of biodiversity?" p.39 references soil compaction but does not go so far to include the advisory that placement of seemingly positive schemes such as solar farms should not be encouraged on grassland and agricultural land without significant further research on soil compaction, soil erosion, soil shading and the impacts on soil bacteria and micros organisms. The observations regrading the importance of soil on page 7- 9 in the WCC Worcestershire State of Nature Report could be referenced here.	Not within LNRS scope to direct development this specifically. Soil health and protection is a major theme within the strategy.	Case study on soil protection (and managing grassland) under PV to be included in PM48 Storymap
29	This parish council Supports page 59 "contribute to climate change adaptation and mitigation", which is in line with our own parish council climate declaration regarding climate adaption.		Support noted and welcomed.

Comment ID	Comment	Considerations	Action
30	Microplastics are mentioned throughout the document but there is no call for further research and funding of research into this problem in our soils and waters. The 65847 Worcestershire State of Nature Report does not look at plastic at all and so we can assume that we do not know anything about the current situation of plastic pollution in Worcestershire, nor are there plans to start looking into this. Missed opportunity.	Placing requirements on e.g. water companies or statutory agencies to tackle microplastic pollution is outside of the scope of LNRS. However, the extent and seriousness of the problem and its impact on wildlife, habitats and natural resources can be better articulated within the strategy.	Text in section 3.3 on Wider Environmental Benefits (Water Quality and Soil Health and Protection) to be updated to refer to microplastics pollution as a specific cause of habitat and natural resource degradation.
31	Expansion required of APIB ID:10014478. Nb. The Non SSSI section of Monkwood Green Common (///spike.milkman.spurring) has been undervalued and should be included as Areas of Particular Importance for Biodiversity, as it has exactly the same species diversity as the rest of the Common and SSSI.	Land referred to is not covered by statutory or non-statutory nature conservation designation or Irreplaceable Habitat and cannot be identified as APIB. Applying these designations is not part of the statutory function of LNRS. Land referred to is covered by multiple mapped Potential Measures and is therefore identified as an Area that Could Become of Particular Importance for Biodiversity. Species-rich grassland, woodland and ancient tree habitats are highlighted as important in this location, amongst others. The importance of enhancing the value of and buffering and enhancing habitat connectivity around the Monkwood Green LWS (APIB 10018555) is reflected in the application of PM41 and 42 in this location.	None
32	Expansion required of APIB ID: 10018438. Nb. All of the land between <i>*redacted text*</i> should be included as an Area of Particular Importance for Biodiversity due to the ancient grassland, ancient hedgerows and diverse mix of tree species.	Outside of Monk Wood Complex LWS (APIB 10118438) the land referred to is not covered by statutory or non-statutory nature conservation designation or Irreplaceable Habitat and cannot be identified as APIB. Applying these designations is not part of the statutory function of LNRS. Land referred to is covered by multiple mapped Potential Measures and is therefore identified as an Area that Could Become of Particular Importance for Biodiversity. Species-rich grassland, ancient woodland and ancient tree habitats are highlighted as important in this location, amongst others.	None

Comment ID	Comment	Considerations	Action
33	Grimley gravel extraction pits (now important lakes and migratory bird destinations) are almost entirely disregarded for their emerging and potential ecological value. ///lucky.sorry.pushy The nearest ref is APIB ID: 10015532	Review PM mapping decisions in area of Grimley Brick Pits. Note that the SSSI designated feature will not be covered by mapped Potential Measures.	PM8 Create and enhance wetland habitats extended in the area surrounding the site.
34	Purpose of the Strategy (p7). The 'purely advisory' description contrasts with the statutory requirements already held by the Environment Agency, Natural England, local authorities and others. It is important to look for gaps between what the LNRS is promoting and where the statutory agencies are below expectation in exercising their duties, and this theme will be developed in subsequent sections. While the LNRS sets out a new statutory framework for implementing BNG, this is essentially linked to planning applications and is already being weakened by government proposals within the Planning and Infrastructure Bill. As it is under attack, could the strategy be made more realistic by making its political vulnerability crystal clear? As always, placing a duty on public authorities is a weak imperative and easily overridden by economics, such as an affordable homes scheme or an industrial estate. Misleading language?	LNRS cannot suggest actions that seek to duplicate or extend the existing legislative functions and role of the statutory agencies, or the protection or role of statutorily designed sites. The Potential Measures within the LNRS are suggested practical actions. The identified delivery mechanisms for LNRS (those defined in legislation and otherwise - see p108 of the strategy) seek to incentivise take-up of Potential Measures and consistency with their suggested actions. Agreed that the strategy could be strengthened in terms of clarity about what is required to successfully implement LNRS.	Text to be added to page 109 to clarify latest guidance from Defra on LNRS delivery role.
35	Priority Habitats (p10). From a rivers and catchments perspective we could not ask for more than to have Rivers and Streams being of high priority and importance as they have been. It remains to see how this follows through in subsequent sections and to point out where the LNRS lacks convincing prescription.		Support noted and welcomed.
36	How you can use the Local Nature Recovery Strategy (p13) & Implementation, monitoring and review of the LNRS (p13). Although the importance of statutory site and landscape designations are mentioned later, they should arguably be flagged up here as a means of delivering the LNRS. At present, Natural England is reluctant to consider additional SSSI designations or even to extend existing ones to give more protective boundaries. It is important to describe their part in achieving the Strategy.	The purposes of an LNRS do not include to create new or amend existing site designations. The importance of Worcestershire's existing core nature network (statutory and non-statutory designated sites) is clear within the strategy (e.g. pgs 8, 27-28, 62-63). Biodiversity Priorities 32, 33 and 34 are focused on improving the condition and functional connectivity between sites within the core nature network. Potential Measures 41 and 42 focus on enhancing and buffering the non-statutory site network.	None
37	How to use the Local Nature Recovery Strategy (p15). This page ought to be clearer on how (or if) the guidance will influence Natural England's policy on SSSI expansion to achieve LNR aims, and what pressure will be put on public and statutory bodies when using their land for nature rather than selling it off for development.	Chapter 5.1 of the strategy sets out what we know about how Defra intend LNRS to be used (December 2024), including how Arms Length Bodies will use LNRS.	None

Comment ID	Comment	Considerations	Action
38	Landscapes important for biodiversity (p29), River floodplains & Watercourses supporting migratory fish (p30). This statement could have also mentioned the importance of floodplain management in maintaining river water quality, as your text does subsequently. The Teme may be the only SSSI river, but the Severn Estuary is SSSI/SAC and some of its important species go upstream to breed. This is set out in more detail later, but could it not refer to Functionally Linked Land here? It offers a way of extending statutory protection beyond the SSSI, though it is not clear if this currently applies upstream in the Severn, other than to specific locations to protect wildfowl and waders. Getting this established has to be important in applying the LNRS because habitat changes in the river have been very serious (<i>*redacted text*</i> , 2024).	Agreed.	Add text to river floodplains section on p29 and watercourses section on p30.
39	Quoting from text: "Worcestershire's rivers, in particular the Severn, Avon, Teme and Stour, are therefore vital in maintaining these species populations and as such are afforded the same level of protection under the Conservation of Habitats and Species Regulations 2017 as the Severn Estuary. Any proposed activity on these functionally linked watercourses is subject to a Habitats Regulation Assessment that must be completed by a competent authority, prior to any works being authorised, ensuring an additional level of protection for internationally important species". The full significance of this is hard to deduce from the text as it stands. It appears to mean that any proposal to discharge into or extract from any of these rivers should be subject to a Habitats Regulations Assessment, which would have to show there will be no significant adverse effect on the integrity of the important species. Does this apply to existing activities, such as sewage treatment works discharges, or only to new plans and projects? The text should be expanded to explain its scope, as it has not come up in conversation with a wide range of stakeholders e.g. Middle Severn CaBA, and it could be a very important tool in achieving the riverine targets.	Agree that this wording could be clarified.	Wording to be amended.
40	North Worcestershire sandstones (p32). 'Conservation' ownership or even site designation does not guarantee action. The Hartlebury Common wetlands for example (SSSI, LNR), owned in part by Worcestershire County Council, have deteriorated over 30 years and lost three key plant species without effective action by Worcestershire CC or by Natural England. Your narrative is glossing over this protracted inactivity and inability of statutory bodies, cited as major players in achieving the LNRS, to do their statutory duties. This is despite continued efforts by local residents and others to get progress. I hope you can see how such examples will erode the public's trust in the LNRS's aspirations.	Concern is noted. The LNRS cannot suggest actions that seek to duplicate or extend the existing legislative functions and role of the statutory agencies. The State of Nature chapter flags the acidic valley mire pool on Hartlebury Common as being threatened by depleted groundwater levels (p20).	Paragraph on the groundwater-fed wetland habitats around Kidderminster and Stourport (p30) to be given its own heading to emphasize their importance. Text to be added to this paragraph to give examples of wetland sites which are threatened by depleted groundwater levels. Text to be added to page 21 and 65 of the strategy to emphasise more strongly the importance of Hartlebury Common Bog and of taking action to restore hydrological function to protect and enhance the habitat. Text to be added to page 109 to clarify latest guidance from Defra on LNRS delivery role.

Comment ID	Comment	Considerations	Action
41	<p>Land managed for nature (p34). It may help to engage farmers generally by emphasising their successes, but looking at it from a rivers and streams point of view, which are amongst the WLNRS priorities, a large amount of our farmers' soil runs off into the rivers, smothering gravels and bottom-growing plants, and reducing the light available for plant growth. It confirms that the provision of schemes such as Catchment-Sensitive Farming is not enough. They have to be targeted on key areas and there is no room for allowing dissenters to object if it is to be successful. Is the map showing vast areas capable of supporting of riverside meadow and measures to prevent eroded soil entering the river based on any reliable expectation of how it will be achieved? Sufficient funding has to be available. Without organising the targeting and bringing in the back-up money it is just an aspiration.</p>	<p>LNRS includes Biodiversity Priorities for improving water quality in our rivers and streams, the restoration of floodplains, and halting the loss of agricultural soils. There are corresponding mapped (targeted) Potential Measures for the creation of riparian buffer zones (PM2), the reversion of land to wet grassland and floodplain meadow (PM3) and non-mapped Potential Measures for protecting and improving water resources (PM4) and protecting soils from erosion (PM36). The accompanying Storymaps set out how the mapped measures have been targeted, and suggest locations where the non-mapped measures would be most beneficial (these are large areas and cannot be targeted sufficiently to be mapped and remain with coverage constraints).</p>	<p>Case study on catchment sensitive farming to be added to PM4 and PM36 Storymaps to highlight best practice.</p>

Comment ID	Comment	Considerations	Action
42	<p>Habitats of national importance under threat in Worcestershire (p38, p53). Quote: "27.25% of the watercourses within Worcestershire are in bad or poor ecological condition, with just 1.5% in good condition." Judging from the evidence of our own eyes, with the River Severn being weedless, and running brown for much of the year, it has to fall within the 27.25% in bad or poor condition, contrary to the EA's assessments, based on complex indices (<i>*redacted text*</i>, 2024). Is the percentage by length, area or number of named sites? How is the general public supposed to do anything about it, other than by supporting Citizen Science groups like CARP and pressing the EA to do its statutory duty? Smaller watercourses are at the mercy of run-off from fields and the use of herbicides for channel management, unchecked by the EA, while rivers are affected by big-time agricultural run-off and discharges from sewage works and septic tank overflows. Despite the received wisdom that the concentration of phosphorus is a proxy measurement for sewage pollution, there is no obvious evidence that anyone is considering the effects of spent pharmaceuticals in sewage or insecticides from dogs, for example. To the informed reader, it is glossing over of complex issues and just omitting what nature needs if it is to recover, though it is mentioned on p53.</p>	<p>Water quality monitoring data is collected and reported by Environment Agency at water body scale (water body boundaries can be viewed at https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/9).</p> <p>Participation in citizen science will be a valuable way to contribute to the delivery of nature recovery in Worcestershire and the strategy could make this much clearer.</p> <p>LNRS includes Biodiversity Priorities for improving water quality in our rivers and streams, the restoration of floodplains, and halting the loss of agricultural soils. There are corresponding mapped (targeted) Potential Measures for the creation of riparian buffer zones (PM2), the reversion of land to wet grassland and floodplain meadow (PM3) and non-mapped Potential Measures for protecting and improving water resources (PM4) and protecting soils from erosion (PM36). The accompanying Storymaps set out how the mapped measures have been targeted, and suggest locations where the non-mapped measures would be most beneficial (these are large areas and cannot be targeted sufficiently to be mapped and remain with coverage constraints).</p>	<p>Bullet point on water quality statistics p38 to be amended to clarify how monitoring data is collected and reported.</p> <p>Bullet point to be added to p110 of strategy about participation in citizen science.</p> <p>Case study on citizen science groups undertaking water quality/river health monitoring to be included in PM4 Storymap along with links to local monitoring projects that people can join.</p> <p>Case study on catchment sensitive farming to be added to PM4 and PM36 Storymaps to highlight best practice.</p>
43	<p>What is driving the loss of biodiversity? (p39). Great to see the reference to over-abstraction of groundwater. Could we not also mention the need to regulate, upgrade or monitor, our ageing sewage treatment facilities? This is affecting our rivers and streams, as citizen science measurements show time and time again. Rivers are rightly put up front as a priority habitat in Worcestershire.</p>	<p>Agreed, this can be stated more explicitly.</p>	<p>Pollution section p40 of the strategy to be amended to refer to: sewage discharge into watercourses, resulting from a lack of investment in sewage treatment infrastructure and poor regulatory oversight of the industry.</p>

Comment ID	Comment	Considerations	Action
44	<p>Opportunities for recovering and enhancing nature in Worcestershire (p49). Quote: "Improve water quality and availability - Reduce nitrogen (N), phosphorus (P) and sediment pollution from agriculture into the water environment by at least 40% by 2038, compared to a 2018 baseline." These targets run for 13 years, predicated on an 8 year old baseline. What has been achieved to date, and how does it match up with recorded deterioration in the condition of the River Severn? Its fine to bring out these impressive targets, but unless they can be matched to what is actually happening they instil little confidence in them as a reliable means of nature recovery. It has to be preceded by a period of research to find out the causes followed by decisive action. Such statements as halt the decline of species abundance by 2030 are simply aspirations.</p>	<p>Targets referred to are national targets set by Government at an England level, either within the Environment Act 2021 or their Environmental Improvement Plan 2023.</p> <p>All LNRS are expected to consider how they can contribute to delivery of these targets in a local context.</p>	None
45	<p>Opportunities for recovering and enhancing nature in Worcestershire (p49). Quote: "Restore 75% of Sites of Special Scientific Interest to favourable condition by 2042. By 31 January 2028 50% of SSSIs will have actions on track to achieve favourable condition." Is there a planned revival in the fortunes of Natural England? For the past few years I have personal experience of them refusing to enter into discussion about even the extension of an existing SSSI in Cheshire and they have allowed sites such as Hartlebury Common (p32) to languish as Unfavourable for decades. Now, they are to have new responsibilities in setting out area characteristics for developing the use of BNG under the Planning and Infrastructure Bill. Is all this even slightly realistic? Nature has been begging Natural England for recovery on neglected SSSIs for a long time now, to no avail. How is the publication of the LNRS going to help?</p>	<p>Targets referred to are national targets set by Government at an England level, either within the Environment Act 2021 or their Environmental Improvement Plan 2023.</p> <p>All LNRS are expected to consider how they can contribute to delivery of these targets in a local context.</p>	None
46	<p>Opportunities for recovering and enhancing nature in Worcestershire (p49). Quote: "Restore 75% of our water bodies to good ecological status". How often we see phrases like this, such as in the requirements of the Water Framework Directive. It may be what many of us want, but there is no evidence of a political will to achieve it. The LNRS would be more credible if it was honest. Moreover, can I add a general commentary on our times:</p> <p>Despite the efforts of Sir David Attenborough and Chris Packham through the media, the public is largely passive about nature. It's a remote 'nice to have', something to enjoy on a holiday, such as a wildlife safari, or see through your window on the bird table. Many in subsequent generations will simply accept whatever they are born into. Members of Parliament (at least in Wyre Forest) avoid environmental issues because, they say, so few of their constituents raise them, even local representatives of the wildlife trust. Environmental activists find that their zeal antagonises and that those of the 'white van' culture stop and swear at them rather than offer support. Parliament legislates against strident protest because it upsets people going about their legitimate business. This is the reality against which the Worcestershire LNRS has to push back if it wants to make our county one of the most biodiverse rather than simply be the latest example of a greenwashing ritual. Just publishing the LNRS will not create the necessary momentum.</p>	<p>Targets referred to are national targets set by Government at an England level, either within the Environment Act 2021 or their Environmental Improvement Plan 2023.</p> <p>All LNRS are expected to consider how they can contribute to delivery of these targets in a local context.</p>	None
47	<p>For p49 and successive pages there is almost total reliance on 'proposing measures'. I wonder if it would help to describe how this takes anything forward. Traditionally, one would engage a consultant to draw up bespoke 'measures' and they or others would be paid to implement it. Sorry, I know it has to be written, but a greater sense of realism would make it more credible and alert our politicians to what they need to do.</p>	<p>Delivery mechanisms for LNRS Potential Measures are set out in section 5.1 of the strategy. Resourcing LNRS implementation and the monitoring of LNRS delivery is acknowledged by DEFRA and Responsible Authorities as a key consideration for the delivery phase.</p>	Text to be added to page 109 to clarify latest guidance from Defra on LNRS delivery role.

Comment ID	Comment	Considerations	Action
48	Other environmental benefits of nature recovery (p50) & Water Quality (p53). How is it that the LNRS falls short of proposing measures for the water industry to clean up its act? Does it plan to leave it to groups such as CARP to press them and statutory regulators to do their job? Perhaps somewhere, you could acknowledge the need for activism to get us over the line.	It is outside of the scope of LNRS to propose measures that replicate existing statutory duties on public bodies. LNRS is not a regulatory mechanism.	None
49	Worcestershire's 30 by 30 baseline (p61). This quite rightly lists designated sites as important in reaching the target. However, as described above (pp32, 49), Natural England, as the statutory body with responsibilities for designating, protecting and enhancing SSSIs, has a poor track-record in recent years. What changes will take place to make these aspirations possible? It will require a sea-change on the part of government to fund NE or a surrogate adequately and populate it with habitat and species specialists capable of making the necessary professional judgements. I think mass lobbying of MPs and pressure through the ballot box should be flagged up as essential 'measures' if the LNRS has the remotest chance of reaching its targets.	Creating new designated sites is not intended to be the sole mechanism for meeting 30 by 30. LNRS is not a regulatory mechanism and cannot duplicate legislation or propose changes to legislation. It is also not within scope of LNRS to propose measures for political action.	None
50	Wetland Habitats (p65). Agreed, but why not link back to measures for improving water quality? (pp38, 49, 53). Agreed on arable reversion and wet grassland restoration, but who will target key areas? Of course no-one knows as yet, but it could mention here the sort of initiatives to set up, and the importance of targeting.	Agreed that the LNRS would benefit from case studies/best practice examples of initiatives/projects that are delivering the types of opportunities identified.	Cases studies to be added to relevant PM Storymaps.
51	Urban habitats (p69). All this was set out in a nature conservation strategy written for the West Midlands by George Barker of the Nature Conservancy Council in the 1980s. We know the requirement, what has always been lacking is sufficient protection through local plans. Sites have always been vulnerable to unmissable economic opportunities through which they are destroyed. BNG has the potential to compensate to some extent, but is being watered down by the Government. Do let's learn from the past and not just repeating the same stuff in a vain hope of it somehow being different now. It isn't.		Comment noted.
52	Landscape-scale and cross-border projects and initiatives (p70). While there is reference to the connectivity provided by rivers for fish migration, would it not also be worthwhile to mention their vulnerability to pollution connectedness? There is evidence from Angling Trust data that the sometimes high concentrations of P around Shrewsbury translate downstream by gradually raising the ambient P level in the river, as shown in the figure below [image provided], to which an Excel linear trend line has been added.	Agreed that reference to this would enhance the text.	Amendment to text in Water Quality section on p53.

Comment ID	Comment	Considerations	Action
53	<p>The role of Responsible Authorities in LNRS implementation (p109). Quote: "Government intends that Strategic Authorities (proposed in the December 2024 English Devolution White Paper107) will play a key role in environmental and climate leadership and this includes being given responsibility (as the 'Responsible Authority') for coordinating delivery and monitoring of Local Nature Recovery Strategies. Government have indicated that the LNRS delivery role for Strategic Authorities will comprise convening local partnerships, helping to coordinate practical action, seeking and securing funding, coordinating investment in nature recovery and wider environmental delivery, and monitoring and reporting on delivery of the LNRS." Will these local partnerships arise without cost? Will there be money via the Strategic Authority to do this, given the officer time it will require? How will under-funded statutory bodies be persuaded to do their job without commitment to more funding from central government? The UK BAP process through HAPs foundered partly on the cost of some of the prescriptions. Here we are again.</p>	<p>The scope of the LNRS delivery role is currently under discussion between Defra and Responsible Authorities. Government's commitment to supporting the delivery of the priorities and measures set out in LNRS's forms part of this discussion.</p>	<p>Text on p109 to be amended to reflect most recent updates from Defra on the LNRS delivery role. Graphic to be inserted showing contribution of different stakeholder groups to LNRS delivery.</p>
54	<p>Monitoring delivery of Local Nature Recovery Strategies (p110). Quote: "Responsible Authorities await confirmation from Government regarding the resources that will be made available to enable effective monitoring of LNRS delivery." If the past is any guide to the future they may have to wait a very long time. The pattern has always been that whenever money is available people choose to spend it on immediate management rather than monitoring. This is why we have very rarely learned from our mistakes in nature conservation and repeatedly re-invent the wheel. Can we confidently predict that no ring-fenced resources will be made available for monitoring?</p>	<p>The scope of the LNRS delivery role is currently under discussion between Defra and Responsible Authorities. Government's commitment to supporting the delivery of the priorities and measures set out in LNRS's forms part of this discussion.</p>	<p>Text on p110 to be amended to reflect most recent updates from Defra on the LNRS delivery role regarding monitoring and reporting.</p>
55	<p>Key to success. Intentions of governments are notoriously fickle and what confidence can anyone have in money being available to provide the necessary lead and organisational focus to drive it forward. This Government is already suggesting that nature is a problem when it comes to the nation's essential economic development, even though such vehemence is officially 'regretted' (Wildlife Trust's reporting) by Steve Reed, Secretary of State for the Environment. It has struck at BNG in particular, one of the few means through which the LNRS provides a statutory requirement to improve biodiversity.</p>		<p>Concern is noted.</p>
56	<p>The fate of precedents. Perhaps the most recent being the Habitat and Species Action Plans under BAP. The steering group for the lowland wetland HAP developed a series of wetland visions for individual regions of the UK and these came together in the 50-year England Wetland Vision of July 2008. Money was made available through Natural England and a lot of excellent restorative work was done in the Midlands Meres and Mosses. The same wetland vision is still promoted on the internet by bodies involved in its original publication. However, despite such initiatives, it seems that restoring nature is deemed to require LNRSs, but will they have more effective outcomes than previous visions and strategies? The writing of LNRSs is a consequence of the Environment Act of 2021, conceived and enshrined in statute by a Conservative government. We now have a Labour government for at least the next four years. To what extent are they, or indeed other parties such as Reform, concerned about the UK being one of the most biodiversity impoverished nations? It is easier, and quite acceptable to the majority of the population, to simply kick the can down the road. Having taken so long to prepare, it has lost the protection provided by its political birth-parents and now has to fend for itself in a hostile world.</p>		<p>Concern is noted.</p>

Comment ID	Comment	Considerations	Action
57	*redacted text* Parish Council discussed the above at a recent meeting are are fully supportive of the Strategy.		Support noted and welcomed.
58	Overall, we have been really impressed with how well put together this draft is, especially given the short time frame you have had. We welcome the opportunities for both our business and the environment. We feel it is wide ranging and comprehensive.		Comment noted and welcomed.
59	Mapping It would be helpful to know that the lines on the proposed mapping are only advisory and might be flexed/extended to take account of natural features on the ground. They occasionally present as just notional lines on the plan and do not follow landscape/natural features. In order to secure the best outcomes, it would be sensible to have these boundaries flex and be approved by agreement with the site being viewed by an appropriate member of the LNRS Team. Even though the LNRS structure is proposed to be reviewed every 10 years, it would be helpful if it could flex and change as time progresses and additional data is gathered. As the LNRS sets out to encourage natural processes, we feel that where these transitions have already started and can be evidenced on the ground, then these areas should be adopted for further enhancement. This is an opportunity to work with nature which rarely abides by lines on a map.	The boundaries of mapped Potential Measures do not present either an obligation or a barrier to landowners and managers but should be viewed as a guide to achieving the best outcomes for nature recovery. The data modelling carried out at strategic county scale will not always be accurate to individual field boundaries. Landowners and managers should apply their more detailed knowledge of the farm-scale landscape whilst using the LNRS as a tool to support decision-making.	None
60	Soils *redacted text* was a pioneer in regenerative agriculture (cover crop integration, direct drilling, living root and livestock integration) in the UK and have been recognised within the industry for our efforts, our Farm Manager *redacted text* was awarded the Farmers Weekly Environmental Champion and the British Farming Awards Arable Innovator of the Year in 2021, these followed the award of Soil Farmer of the Year in 2020. He has spoken at the Oxford Farming Conference, The Real Oxford Farming Conference the NFU and CLA Annual Conferences on a wide range of topics from Precision Farming, to Regenerative Agricultural techniques and Carbon. Therefore , as demonstrated by these awards health and condition of our soil is incredibly important to us and therefore, we welcome the inclusion biodiversity priority 37 and 38. Whilst we appreciate that options such as PM 4 have been included. Other more directly applicable PMs such as PM 35 could offer a great opportunity to raise the bar more broadly, but these measure should be rewarded in the same way as the mapped measures so we are able to find additional funding to assist with the “more, bigger, better and more joined up” approach.	Agreed. LNRS non-statutory guidance is clear that mapped and non-mapped Potential Measures are equally important in the context of enabling everyone to take action for nature recovery. It is important that this is clearly articulated in the strategy. Some non-mapped Potential Measures, such as PM4, PM35 and 36, would be beneficial for nature recovery in any location but coverage constraints (based on advice from Defra on the total percentage of the county land area that Government expects to see covered by mapped measures) prevent this being reflected on the Local Habitat Map. The Storymaps accompanying each non-mapped Potential Measure do, where the data is available, give more detail on where the delivery of these measures might still be most beneficial.	Text on page 86 to be amended.

Comment ID	Comment	Considerations	Action
61	<p>Specific Land Parcels</p> <p>Given the content of the draft LNRS and our potential goals we have identified several areas that could really help bring forward many of your aims. We appreciate your targets of 30 by 30 and we wish to support this if we are able to:</p> <ul style="list-style-type: none"> ✿ Firstly, the Long Meadow shown below [map provided], on the northern side of the Carrant Brook between the bend in the B4079 on the western side and Crashmore Lane to the East looks like it could offer a lot of opportunities and help meet several of the aims of the LNRS. ✿ We have also identified a parcel [map provided] on the top of Bredon Hill that we have been advised by the West Midland Bird Ringers would provide an excellent site for migratory birds without them having to come down into the Vale. This area is partly within the Calcareous Grassland identified above. Having been removed from arable rotation several years ago, it is already, through natural processes partially reverting to a scrub mosaic and this combined with some water features could create a fairly unique landscape within Worcestershire. 		<p>Long Meadow added into PM1 mapping.</p> <p>PM23 mapping extended.</p>
62	PM 02 – As currently presented on the map this is not connected along the whole of the brook on the *redacted text* land holding and we feel it should be for continuity and to enable the best possible outcomes		PM2 mapping amended
63	PM 03 – It would make sense if this was extended along the whole of the north side of the Carrant Brook on the *redacted text* land		PM3 mapping amended
64	PM 08 – As above it would be better to expand along the whole length for the same reasons		PM8 mapping amended
65	PM 12 – (Shown above) [map provided] We are all being encouraged to plant more woodland and we can see many advantages to this, the area highlighted below seems to be a very sensible area to do this to provide a greater degree of habitat variation in the landscape in this lower lying area and to try and support a more diverse habitat mosaic		PM12 mapping amended
66	PM13 – Not all woodlands on the maps are covered by this option which seems a shame and we would encourage the adoption of all woodlands into this Potential Measure	Woodlands targeted by PM13 are a prioritised subset of the woodland network opportunity mapping.	PM13 mapping extended to additional sites.
67	PM 20 – This seems to be shown in slightly odd, almost random blocks (as seen above) [map provided]	PM20 was targeted to an area agreed with the Gloucestershire LNRS to cover the landscape between Bredon Hill and Dixton Wood. Built up areas, roads and gardens were removed.	Small outlying polygons non-contiguous with the main mapped area have been removed.
68	PM 23 – Given the point above regarding the scrub already having started a natural regeneration process in this area, the map shows just a few 'blobs' (as seen above) which should be extended to the field parcel to the north as this is where it is already occurring and therefore appears to be most suitable.		PM23 mapping amended

Comment ID	Comment	Considerations	Action
69	PM 26 – These areas seem to be mapped sporadically, not highlighting actual areas of orchards, in fact gardens and immature woodland has been identified in some parcels. I would strongly suggest this data set is reviewed.	This PM is mapped to old traditional orchards which are identified on the Worcestershire Habitat Inventory ⁸ , using data from the England Priority Habitat Inventory and local datasets. It is possible that some sites have scrubbed over with secondary woodland, or surviving parts are now incorporated into gardens, but enough fruit trees remain that the site still meets the definition for restorable traditional orchard. We welcome submissions of data to maintain the accuracy of the Worcestershire Habitat Inventory.	None
70	PM 31 – These areas are very difficult to manage and in order to protect them having some support through this document is incredibly helpful for us, what would be useful is to know what further options we might have under PM31.		Case studies and guidance to be added to PM31 Storymap
71	PM 41 & 42 really welcome this, my only challenge to this would be could the areas be even more ambitious?	Support for these Potential Measures is very welcome. The legislation only requires Local Wildlife Sites to be included within the APIB layer on the Local Habitat Map. In Worcestershire we were successful in adding Local Geological Sites, Grassland Inventory Sites and Roadside Verge Nature Reserves as APIB, as these sites are all given equal weight in local planning policy. The 50m buffer suggested by PM42 is an acceptable compromise between buffering sites, connecting closely located sites, and adhering to Defra guidance on coverage constraints.	None
72	PM 63 – Given the habitat potential and other options on the parcel at the Long Meadow it seems non-sensical to not have this PM along the length of the Carrant Brook that is highlighted by other PMs, we have been told there is a significant potential to increase numbers along the Carrant Brook if we undertake further works and therefore urge you to extend PM 63 to the area discussed above.		PM63 mapping amended

8 Available at www.worcestershire.gov.uk/habitatinventory.

Comment ID	Comment	Considerations	Action
73	<p>Feedback on Survey</p> <p>When considering the survey responses we would like to add the following; -</p> <ul style="list-style-type: none"> ✿ We appreciate that you want to rank the species in Q. 40 however, we would also like to see support for the following species adders, hedgehogs, brown hairstreak, black poplar, house martins and swifts, woodland bat assemblages, barn owls, lapwing and spotted flycatchers. ✿ In Q. 42 given the location and population of Violet Click beetle we would obviously support measure to assist their numbers. However, with their specific requirements, the funding of measures to help this species needs to be looked at very carefully to make it financially visible. ✿ We have already taken part in a Citizen Science Project and would welcome more collaborative working. 	<p>Support for additional species and species assemblages noted.</p> <p>Agreed. Delivery of LNRS priorities and measures will always ultimately depend on financial viability and landowners and managers must be given appropriate support.</p> <p>Support for further collaboration and citizen science involvement is welcomed.</p>	None
74	<p>Financial Viability</p> <p>Whilst we fully support the primary motivators and reasoning of the draft LNRS, we feel it is imperative to remind you that none of the enhancements/changes are able to come forward if they are not financially viable. As a farming and land management business our bottom line has been significantly impacted in recent years and therefore, where we may have been able to deliver some of these measures without external funding in the past, we are unable to do so now because of the varied and significant pressures we face. The business is committed to 'doing the right thing' however, we need to find revenue streams to enable these projects to come forward to provide the outcomes we are all so desperately hoping for. We look forward to seeing the final version of the LNRS and with the scope of the changes/enhancements identified in the draft we are very excited about working together in the future.</p>	<p>Agreed, the appropriate funding mechanisms and incentives will be key to delivery.</p> <p>Support is noted and welcomed.</p>	None
75	<p>I have now had the chance to look at the LNRS and have submitted a response. To give you a heads up I like a whole lot about the strategy, but I think where a habitat bank or habitat creation project (in the terms of para 68 [of the LNRS statutory guidance]) is underway, the edges of the strict buffer width approach could be blurred to incentivise and reward them.</p>	<p>Site-specific comments submitted via Local Habitat Map consultation form.</p>	Mapping decisions reviewed for the site.
76	<p>1. Ancient Woodland and Veteran Tree Protection</p> <p>Ancient woodland and veteran trees are irreplaceable habitats that require explicit recognition and safeguarding in the LNRS. National Planning Policy Framework (NPPF) paragraph 193(c) is clear: development resulting in loss or deterioration of ancient woodland or veteran trees should be refused unless wholly exceptional circumstances apply. We recommend that the LNRS:</p>		
77	<ul style="list-style-type: none"> ✿ Map all ancient woodlands using the Ancient Woodland Inventory (AWI) and all known ancient and veteran trees using the Ancient Tree Inventory (ATI). These should be identified as Areas of Particular Importance for Biodiversity (APIBs). 	<p>The England Ancient Woodland Inventory, Worcestershire Biological Records Centre Ancient Tree Inventory and Woodland Trust Ancient Tree Inventory are all incorporated within Worcestershire's APIB layer.</p>	None

Comment ID	Comment	Considerations	Action
78	✿ Apply a minimum 50m buffer around all ancient woodland, with larger buffers near infrastructure or sensitive habitats.	Ancient woodland with a non-statutory Local Wildlife Site designation has a 50m buffer applied under PM42. Buffers to ancient woodland mapped as irreplaceable habitat or ancient woodlands which have a statutory SSSI designation may arise from the targeted mapping of PM12: Plant new woodland and trees outside woodland, which derives from application of the woodland habitat network opportunity mapping. Buffers may vary in width depending on habitat and land use.	None
79	✿ Require a Root Protection Area (RPA) of at least 15x trunk diameter or 5m beyond the canopy (whichever is greater) for all ancient and veteran trees.	Ancient and veteran trees mapped as irreplaceable habitat all have a 30m radial buffer applied from the trunk (assumed to be the spatial location indicated by the grid reference of the tree).	None
80	✿ Prioritise restoration of Plantations on Ancient Woodland Sites (PAWS), particularly where conifer plantations suppress native flora.	Non-SSSI PAWS woodlands are mapped to Potential Measure 10: Restore PAWS woodlands. SSSI PAWS where PAWS restoration forms part of the site management plan or Natural England's Views About Management will not be mapped under this measure.	None
81	✿ Protect wood pasture and historic parkland, recognising their composite biodiversity, landscape, and heritage value.	Wood pasture and parkland, as well as ancient and veteran trees, are all identified as priority habitats for the Worcestershire LNRS. There are four mapped Potential Measures that promote the protection, enhancement, creation and management of these habitats.	None

Comment ID	Comment	Considerations	Action
82	<p>✿ Strengthen cross-referencing with Worcestershire's Green Infrastructure Strategy and Local Plans to ensure protections are embedded in statutory planning.</p>	<p>Agreed, this is very important. The links with delivery of green infrastructure are frequent throughout the LNRS. One of the LNRS headline principles is to support the delivery of good green infrastructure within the built environment. There are three Biodiversity Priorities and eight Potential Measures within the LNRS Green Infrastructure theme. The Worcestershire Green Infrastructure Strategy (published 2023) refers to the preparation of the LNRS, and this will be updated when the GI Strategy is reviewed in 2028. The Worcestershire Green Infrastructure Partnership is likely to be a key delivery body for the relevant LNRS Potential Measures (GO partners were involved in LNRS preparation).</p> <p>The relationship between LNRS and Local Plans is set out within the Environment Act and Levelling Up and Regeneration Act and related statutory guidance.</p>	<p>Ensure Worcestershire Green Infrastructure Partnership members are engaged in LNRS transition to delivery process.</p> <p>Update Worcestershire GI Strategy in 2028 to strengthen links with LNRS.</p>
83	<p>2. Woodland Expansion, Connectivity, and Natural Regeneration</p> <p>The Worcestershire LNRS must set ambitious, measurable targets for woodland creation and canopy cover expansion. The Climate Change Committee recommends 19 per cent woodland cover nationally by 2050. Worcestershire should adopt this benchmark, with interim targets for 2030 and 2040, alongside equitable distribution across landscapes. We recommend that the LNRS:</p>		

Comment ID	Comment	Considerations	Action
84	<ul style="list-style-type: none"> Commit to increasing tree canopy cover to at least 19 per cent by 2050, with interim milestones. 	<p>Achieving a minimum urban tree canopy cover of 20% (30% if 20% is already reached) is recommended within Potential Measure 38: Wildlife habitats within the built environment.</p> <p>Other LNRS measures concerned with the creation of woodland and planting of trees outside woodland are:</p> <ul style="list-style-type: none"> Mapped Potential Measure 12: Plant new woodlands and trees outside woodlands. Non-mapped Potential Measure 14: Increase tree cover in the farmed landscape. <p>On the advice of the Defra Arms-Length Bodies, PM12 and PM14 do not have canopy cover targets associated with them for the wider countryside (non-urban canopy cover). PM12 Storymap contains an interactive map showing existing average tree canopy cover in each of Worcestershire's Wards. This varies from 7-30%, with a county average of 10%. PM14 Storymap embeds the interactive Trees Outside Woodland map published by Forest Research, which maps existing small woods, groups of trees and individual trees.</p>	None



Comment ID	Comment	Considerations	Action
85	<ul style="list-style-type: none"> ✿ Undertake opportunity mapping to prioritise woodland creation: <ul style="list-style-type: none"> • Adjacent to existing ancient woodland and Local Wildlife Sites. • Along river corridors (Severn, Avon, Teme) for flood management. • On marginal farmland, particularly in the Vale of Evesham, Lias clays, and Severn floodplain. • In peri-urban areas around Worcester, Kidderminster, Redditch, and Malvern. 	<p>The LNRS contains the following mapped Potential Measures:</p> <ul style="list-style-type: none"> ✿ Creation of riparian buffer zones (PM2), which includes woodland and wet woodland ✿ Creation of woodland and trees outside woodland (PM12). The development of Worcestershire’s woodland habitat network underpinned the targeting of Potential Measure 12 and the modelling methodology is set out in the Storymap. ✿ Increasing urban tree canopy cover (PM38) ✿ The LNRS contains the following non-mapped Potential Measure: ✿ Increasing tree cover in the farmed landscape (PM14) 	None
86	<ul style="list-style-type: none"> ✿ Prioritise natural regeneration wherever possible, as a cost-effective and biodiverse approach to woodland creation. 		<p>Add text to woodland habitats paragraph on p66 of the strategy to note that woodland creation can be achieved both by tree planting and by allowing the natural regeneration of native species.</p> <p>Wording of Potential Measures 10, 11 and 12 amended to include natural regeneration of native species.</p>
87	<ul style="list-style-type: none"> ✿ Support linear wooded features – hedgerows, shelterbelts, riparian buffers, and agroforestry systems – to connect fragmented habitats. 	<p>All of these wooded features are included within the wording of existing Potential Measures. See PMs 2, 14, 16, 17. Also see reference to landscape-scale habitat connectivity in PM12</p>	None
88	<ul style="list-style-type: none"> ✿ Align with the Lawton Principles of “bigger, better, and more joined up” landscapes. 	<p>The first headline principle of the LNRS is to ‘create bigger, better, more joined up areas for nature’.</p>	None
89	<p>3. Urban and Peri-Urban Greening and Tree Equity</p> <p>Urban trees deliver disproportionately high benefits for people, yet canopy cover is often lowest in deprived communities. Worcester and other urban centres need stronger commitments to equitable greening. We recommend that the LNRS:</p>		

Comment ID	Comment	Considerations	Action
90	✿ Undertake a county-wide canopy audit, broken down by ward or Lower Super Output Area (LSOA).	PM12 Storymap contains an interactive map showing existing average tree canopy cover in each of Worcestershire's Wards, which combines National Forest Inventory and Trees Outside Woodland datasets. Average canopy cover varies from 7-30%, with a county average of 10%.	None
91	✿ Develop a Tree Equity Score for Worcestershire (building on the Woodland Trust's national tool) to identify areas where planting would most benefit communities.	Agreed, this would appear to be a useful tool in targeting effort to increase tree cover in urban and peri-urban areas.	Embed link to Tree Equity Score UK Map with accompanying text into PM12 and 38 Storymaps.
92	✿ Require minimum 30 per cent canopy cover in new developments and set retrofit targets for existing housing estates.	LNRS sets a suggested minimum target of 20% canopy cover within the built environment, rising to 30% where 20% cover already exists. This is considered to be achievable.	None
93	✿ Embed urban greening and SuDS-linked tree planting in Local Plans.	A set of proposed supporting activities for facilitating delivery of LNRS priorities are presented within the strategy. These include how local plans and local planning policy should seek to support habitat creation and protection, and to deliver wider environmental benefits such as surface water management.	None
94	✿ Support community-led initiatives such as pocket forests, parish orchards, and school planting projects, with clear funding and long-term management frameworks.	Potential Measures 38 and 39 and Supporting Activity 12 provide a framework within which these types of initiatives could be promoted and delivered. Community engagement and participation in citizen science will be important pillars of LNRS delivery and this could be made more explicit within the strategy. LNRS will not directly provide funding but should be used as a framework to develop projects and evidence the need for funding.	Amendment to final bullet point on p110 to mention citizen science. Insertion of new page after 109 with pillars of participation in LNRS delivery, emphasising the role of communities and schools (and others).
95	4. Hedgerow, Orchard, and Field Margin Restoration Hedgerows and orchards are iconic in Worcestershire, vital for biodiversity, landscape character, and cultural identity. Yet both have declined dramatically in recent decades. We recommend that the LNRS:		

Comment ID	Comment	Considerations	Action
96	✿ Map historic hedgerow networks and prioritise reinstatement in fragmented landscapes.	Potential Measure 16: Create new hedgerows includes the reinstatement of 'ghost' (lost) hedgerows as a suggested action. Coverage constraints prevent this measure being mapped.	PM16 Storymap will be enhanced with interactive maps.
97	✿ Promote traditional hedgerow management (coppicing, laying) through advice and funding.		Text to be added to Potential Measure 17: Enhance condition of hedgerows to include coppicing and laying as traditional management techniques.
98	✿ Require wildflower-rich margins alongside hedgerows to boost pollinator and bird diversity.		Add 'and wildflower-rich margins' into wording of Potential Measures 16 and 17.
99	✿ Recognise scrub and early successional habitats as legitimate land uses that provide connectivity between woodland and open habitats.	Scrub is an LNRS priority habitat. Potential Measure 24 suggests the creation and enhancement of scrub habitat in its own right and as an ecotone between habitats, and scrub is recognised as an important component of a habitat mosaic in Potential Measure 23.	None
100	✿ Prioritise the conservation of traditional orchards, particularly those supporting mistletoe and species such as the Noble Chafer beetle.	Traditional orchards are an LNRS priority. The creation, restoration and enhancement of traditional orchards is the focus of Potential Measures 25, 26 and 27. All older traditional orchards mapped on the Worcestershire Habitat Inventory ⁹ , including all those listed as Local Wildlife Sites, should be mapped to PM26: Enhance wildlife value of older traditional orchards.	None
101	✿ Link orchard restoration with Worcestershire's cultural tourism and cider-making heritage.		Section to be added to PM26 Storymap to better interpret the history and local heritage/distinctiveness of Worcestershire's orchards.
102	5. Protecting and Enhancing Local Wildlife Sites (LWS) Local Wildlife Sites are vital but often under-resourced. The LNRS must strengthen their role within Worcestershire's ecological network. We recommend that the LNRS:		

9 Available at www.worcestershire.gov.uk/habitatinventory.

Comment ID	Comment	Considerations	Action
103	✿ Incorporate all LWS into APIB mapping and ensure planning policy gives them significant weight.	The Environment Act already requires that Local Wildlife Sites are mapped as APIB. In Worcestershire Local Wildlife Sites have protection within local planning policies in all districts.	None
104	✿ Resource the development and delivery of management plans for all LWS.	Directly providing the resources for this is outside of the scope of LNRS, however LNRS should provide an incentive and a mechanism to engage with LWS owners. Worcestershire has an active Local Wildlife Sites Partnership who are engaged in transitioning to LNRS delivery.	None
105	✿ Set a county target to increase LWS in positive conservation management to at least 70 per cent by 2030.	No numerical baseline is available and no target for improvement has been set, but the desired outcome suggested here is provided for by Potential Measure 41: Enhance the biodiversity value of non-statutory nature conservation sites.	None
106	✿ Work with Worcestershire Biological Records Centre (WBRC) to ensure data is regularly updated.	Up-to-date, quality data will be essential to monitor and report on the delivery of LNRS priorities. WBRC have been active partners in preparation of the strategy. The strategy encourages the submission of data to WBRC or the iRecord app (p110) and all Potential Measure Storymaps include a link to iRecord (WBRC receive iRecord data).	None

Comment ID	Comment	Considerations	Action
107	<p>6. Priority Species Recovery</p> <p>The Worcestershire LNRS should identify focal zones and measurable objectives for species recovery. Priority should be given to species dependent on treescapes, such as:</p> <ul style="list-style-type: none"> ❁ Barbastelle bat (requires ancient woodland connectivity). ❁ Hazel dormouse (dependent on connected hedgerows and woodland). ❁ Lesser spotted woodpecker, spotted flycatcher, and willow tit (all associated with mature woodland). ❁ Noble Chafer beetle (linked with traditional orchards). <p>We recommend that the LNRS:</p>	<ul style="list-style-type: none"> ❁ Barbastelle bat and hazel dormouse are both species priorities for the LNRS. ❁ Lesser spotted woodpecker was assessed by the County Bird Recorder as Category A. The species will benefit from the creation and enhancement of woodland and wet woodland habitat under Potential Measures 2, 8, 10, 11, 12 and 13. ❁ Spotted flycatcher was assessed by the County Bird Recorder as Category A. The species will benefit from the creation and enhancement of woodland, trees outside woodland and hedgerow habitat, and the creation and management of wildlife friendly habitats on farmland under Potential Measures 10,11, 12, 13, 14, 16, 17 and 18. ❁ Willow tit was assessed by the County Bird Recorder as Category G. It is considered extinct within the county. ❁ Noble chafer beetle is assessed as Category A as this species will benefit from the creation, restoration and sensitive management of traditional orchards. Comment has highlighted need to review wording of PMs 25 and 26 to better reflect habitat requirements of noble chafer. 	<p>Wording of PMs 25 and 26 to be amended to include the retention of standing and fallen deadwood and the management of hedgerows and margins to provide food sources.</p>
108	<ul style="list-style-type: none"> ❁ Set measurable species recovery objectives (population trends, breeding sites, habitat area). 	<p>This was not a requirement for LNRS Potential Measures. Some species do not have sufficient, reliable baseline data on which to set such projections.</p>	<p>None</p>
109	<ul style="list-style-type: none"> ❁ Support species through habitat mosaics in areas such as the Malvern Hills, Wyre Forest, and Severn floodplain. 	<p>The LNRS contains mapped Potential Measure 23: Create and enhance a habitat mosaic. This is targeted to locations countywide where habitat network modelling indicated that a mosaic of habitats would offer the greatest benefits for wildlife.</p>	<p>None</p>



Comment ID	Comment	Considerations	Action
110	<ul style="list-style-type: none"> Ensure that any species reintroduction is only pursued where habitat quality and connectivity are robust. 	Agreed, this is a sound principle. This is explicit in the revised wording of Potential Measure 52: Dormouse surveys and reintroductions. The only other species for which reintroduction is proposed within the LNRS is the Kentish Glory moth, and the appropriate surveys have already established that habitat quality and connectivity are suitable.	None
111	<p>7. Embedding the LNRS in Planning and Policy Frameworks</p> <p>The LNRS must have statutory weight in guiding land use and planning. Without this, its ambitions risk being undermined by unsympathetic development. We recommend that the LNRS:</p>		
112	<ul style="list-style-type: none"> Be explicitly treated as a material consideration in planning applications. 	All public authorities must 'have regard' to LNRS under the Environment Act. This includes Local Planning Authorities within the process of plan-making. Consideration should be given to how areas mapped within a LNRS and the Potential Measures proposed for them should be reflected in the plan, including the extent of safeguarding which should be applied in those locations. This is set out explicitly within the strategy.	None
113	<ul style="list-style-type: none"> Direct Biodiversity Net Gain (BNG) delivery to LNRS opportunity areas, particularly APIBs and mapped corridors. 	The statutory role of LNRS with regard to the spatial targeting of BNG is made clear in the strategy. UKHab codes are provided to ensure the delivery of BNG is consistent with mapped Potential Measures.	None
114	<ul style="list-style-type: none"> Ensure Local Plans and Neighbourhood Plans reference LNRS goals, including buffer zones, tree retention, and canopy targets. 	All public authorities must 'have regard' to LNRS under the Environment Act. This includes Local Planning Authorities within the process of plan-making. Consideration should be given to how areas mapped within a LNRS and the Potential Measures proposed for them should be reflected in the plan, including the extent of safeguarding which should be applied in those locations. This is set out explicitly within the strategy.	None
115	<ul style="list-style-type: none"> Embed LNRS priorities in other county strategies, including the Pollinator Strategy, Green Infrastructure Strategy, and Local Transport Plan. 	Agreed, this is important.	This will be done as other county strategies are reviewed and updated.



Comment ID	Comment	Considerations	Action
116	8. Implementation, Monitoring, and Accountability The LNRS will only succeed if underpinned by clear accountability and regular monitoring. We recommend that the LNRS:		
117	✿ Establish a public dashboard tracking progress against canopy cover, LWS management, hedgerow length, and species indicators.	Responsible authorities will be required by Defra to monitor and report on delivery of LNRS priorities.	ArcOnline tools/apps to be investigated for their suitability in providing a publicly accessible dashboard as part of the reporting function.
118	✿ Commit to a 5-year review cycle, aligned with the Environment Act's monitoring framework.	The timetable for review and republication of the LNRS is set by the Secretary of State, not Responsible Authorities.	None
119	✿ Establish a multi-stakeholder delivery partnership, including farmers, landowners, conservation bodies, and community groups.	Agreed, this is part of the LNRS delivery role set out by Government	Proceed with transitioning to delivery role as per instructions from Secretary of State
120	✿ Secure dedicated funding streams, including ELMs (Environmental Land Management schemes) and private investment through biodiversity credits.	The LNRS will be a key pillar in how the targeting and delivery of nature recovery through ELMs, BNG and other funding mechanisms is incentivised, but these funding streams will not be controlled by LNRS. The Responsible Authority and the future LNRS multi-stakeholder partnership may seek project delivery funding from other sources such as grants or partnership contributions, although this is not explicitly part of the LNRS delivery role set out by Government.	Proceed with transitioning to delivery role as per instructions from Secretary of State
121	I have been trapping Mink in South Staffordshire (Wombourne area) River Stour/Smestow Brook/Wom Brook catchment since 2021/22 to date. I just feel it necessary to reiterate that from my own consultations with leading figures/scientists in the Waterlife Recovery Trust (national eradication Mink project) is that in order to protect/promote any remaining populations of Water Voles within Worcestershire there has to be a county (landscape scale) eradication via trapping of American Mink. Preferably to be in partnership with bordering counties. Improvements to Water Vole riparian habitat will only help this mammal once the threat of American Mink has been removed. Waterlife Recovery Trust can provide evidence of this fact across Norfolk/Suffolk where WV populations are now increasing (contact *redacted text*). As far as I know the Canal & Rivers Trust are not trapping Mink on the Staffs/Worcs canal but they should be. I am trying to help them find a solution to get them trapping. If WV populations recovered then as a currently missing important eco-system engineer, their vacant burrows could provide overwintering sanctuary to Grass snakes and amphibians. WV's are also a vitally important food source for other predators, Barn Owls, Herons etc. That food source is missing and therefore affects biodiversity.		Wording of Potential Measure 49 to be amended to emphasize the importance of a catchment-wide/landscape-scale approach to mink control.

Comment ID	Comment	Considerations	Action
122	I have been mapping colonies of House Martins for the fairly new charity 'Housemartin Conservation in UK and Ireland'. As yet I have only found one colony in the extreme north of Worcestershire on a relatively new housing estate at Hagley. I am shocked at how few colonies there are in my home area of Stourbridge (nil). Consultation with this charity may well help you and ongoing education of the public on how rare this species now is. I could see evidence that some householders have taken measures to prevent birds from nesting at this Hagley site.		Link and case study to be added to PM59 Storymap to highlight the work of House Martin Conservation UK & Ireland.
123	I hope that pollinator friendly roadside verges can be expanded across the county that will not only help pollinators but also reduce council costs for cutting. Every inch of land has to be used in the most productive/efficient way to improve biodiversity. Floral areas within towns/cities could/ should include plant species that provide nectar/pollen for pollinators: most traditional bedding plants do not! Professor Dave Goulson wrote an excellent book on this subject, 'Gardening for Bumblebees'.	The LNRS contains Potential Measure 47: 'Enhance the biodiversity value of all road verges' (amended to include all transport corridors) to support this outcome.	None
124	Our records indicate that within the Worcestershire area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. We note that this current consultation relates to a Local Nature Recovery Strategy and I can confirm that the Planning team at the *redacted text* have no specific comments to make on this document.	None	None
125	The meadows off Stocks Lane at Newland north of Malvern, subject to a recent planning refusal by MHDC because they are priority habitat, appear not to have been marked on the map. If so, this is a significant omission which needs to be rectified. South of Malvern, the field north and west of the junction between Upper Welland Road and Assarts Lane was subject to a planning application at one point. That application had a very poor ecological survey attached, with a field visit carried out in October - however this showed the presence of a number of neutral grassland species, and the field would benefit from a better survey at the correct time of the year. The playing field off Assarts Lane, which adjoins this field, has significant neutral grassland interest with several key NVC MG5 species present.	Mapping decisions and mapped Potential Measures to be reviewed at this location.	PM29 mapping amended in both locations.
126	There is a large and rapidly increasing body of research showing how with climate change urban areas are becoming much hotter than the surrounding countryside. I don't think the link is made in the text between the creation and wildlife enhancement of green space in urban areas and the mitigation against this urban temperature increase. Furthermore current planning applications and permissions produce further areas of densely packed accommodation with minimal if any green space, rather than acknowledging the importance of actively incorporating heat reducing (and incidentally biodiversity beneficial) significant areas of green space in all developments from now on. The final bullet point of 'Habitat Potential Measures' 38 - "Link urban green spaces to the local nature network in the surrounding countryside via green, wildlife-friendly corridors" should be a measure in its own right. My former Colleague in Natural England *redacted text* coined the expression "Doorstep to Landscape", whereby everybody should be able to step out of their front door and be contiguously linked ecologically to the wildest place in Britain. I'd recommend the LNRS incorporates that aspiration.	The link between climate adaptation and the creation of and access to urban greenspace is made in Chapter 3.3 of the strategy within the climate adaptation section (p59). The LNRS headline principles on p76 also include 'Champion resilience to climate change' which references the need to increase climate resilience within the built environment. Agreed that the 'Doorstep to Landscape' concept and aspiration should be better reflected within the strategy.	Amendment to text on p60 in Health and Wellbeing section to incorporate 'Doorstep to Landscape' aspiration and Government's '15 to green' EIP objective.

Comment ID	Comment	Considerations	Action
127	Native Black Poplar: Comments on Local Nature Recovery Strategy Potential Measure 69. The general aim is good but it might be refined and improved as: Increase numbers and genetic diversity and restore across its past distribution in Worcestershire. Rationale: The population of Worcestershire trees appears to have a very narrow genetic base – see case study below [provided] – and there is a need to diversify this to ensure it is more resilient. Black poplar is still quite widely distributed across the county – but as older trees are lost and not replaced the distribution is becoming more ‘gappy’.	Agreed, the importance of increasing genetic diversity can be more strongly emphasised.	Amend title of PM69.
128	Comments on specific actions: Reintroduce male and female trees in pairs in targeted locations. <ul style="list-style-type: none"> ✿ Suggest planting a group of several males around a female to maximise the likelihood of native black poplar pollen fertilising females. (Note there are a lot of hybrids and cultivars of poplar in Worcestershire with the potential or likelihood of their pollen fertilising planted females.) ✿ Note that not all native black poplars are found in floodplains or ditches – for example in the Castlemorton area they may be in locations that are quite distant from water courses. So ‘targeted’ locations needs further guidance or thought as suitable locations can include sites that are not floodplain. 	Agreed on both points.	Amend wording of PM69.
129	Comments on specific actions: Protect existing black poplars... <ul style="list-style-type: none"> ✿ Agree this is an important measure. ✿ Suggest expanding to include extend life of ancient/veteran trees by re-pollarding, crown lightening and/or tree surgery. 	Agreed, this text can be included.	Amend wording of PM69.
130	Comments on specific actions: Establish a clone bank of local trees <ul style="list-style-type: none"> ✿ The measure should be reframed as establish a clone bank to support black poplar planting with a more diverse range of genotypes. 	Agreed, this text can be included.	Amend wording of PM69.
131	Suggested additional measure [for Black Poplar] – Assess current population status in Worcestershire through sample survey or focusing citizen science across the county.	This can be added as a suggested action within the wording of the existing Potential Measure.	Amend wording of PM69.
132	Archaeology <p><i>*redacted text*</i> officers welcome and support the inclusion of protecting heritage and the historic environment as part of the delivery of “nature recovery co-benefits”. The draft strategy could however go beyond recognising the benefits of nature recovery for heritage, so as to recognise that heritage can also benefit nature recovery. Natural England’s document “Nature Recovery and the Historic Environment”, sets out some benefits and delivery mechanisms for achieving this.</p> <p>Heritage assets such as “historic routeways” and “designed landscapes” can provide important links in a national biodiversity network. Heritage assets have characteristics that often dictate what habitats and species will prosper. Furthermore, the actions we take to improve soil health, air and water quality are almost always the same actions we want to take for heritage features (see link above).</p>	Agreed, the recognition of links between nature recovery and the protection of heritage and the historic environment can be strengthened.	Add paragraph to ‘Landscapes important for biodiversity’ section.



Comment ID	Comment	Considerations	Action
133	<p>Transport Planning</p> <p>*redacted text* officers are broadly supportive and have no specific comments regarding the draft WCC Local Nature Recovery Strategy. As reference, officers point to the adopted Gloucestershire Local Transport Plan (2020-2041) document and supporting Habitats Regulations Assessment.</p>		Comment noted.
134	<p>I note that in the postcode area of WR13 5AZ you have not considered the Priority Habitat Lowland Meadow as part of the Open Habitat PM29 Create or Enhance Species Rich Neutral Grassland measure. This priority habitat (please see the attached Magic screenshot) [provided] has been degraded through inappropriate management since 2021 and has great potential to be enhanced if managed correctly. The actual grassland is a MG5 grassland of which there is very little habitat remaining in England. Any parcels of MG5 grassland that are 0.5 ha or greater should be considered for SSSI designation, and if the surrounding landscape could also be managed in a more favourable way, this would certainly boost the recovery of nature in the local area and beyond. I certainly hope this is taken into consideration in your mapping.</p>	Habitat modelling and mapping of PM29 to be reviewed in this location.	PM29 mapping amended in this location.
135	<p>Firstly, the inclusion and recognition of air quality within the strategy is very welcome. Of particular interest in respect of air quality is Potential Measure 38 and increasing urban tree cover. The draft local habitat map confirms this measure is applicable to significant swathes of the major urban centres within the county, many of which include areas of concern with respect to air quality or have had in the past: Bewdley, Bromsgrove, Evesham, Kidderminster, Redditch, Stourport, and Worcester for example.</p> <p>Most of these areas of concern relate to the street landscape creating a canyon effect trapping and concentrating air pollutants, mostly related to emissions from traffic in the past though other combustion sources such as domestic wood burning are increasingly becoming a concern. And therefore, it is essential to carefully manage tree planting to avoid creation of new street canyons or reducing dispersal and concentration of pollutants.</p> <p>Within the plan itself I note the section on air quality on pg 52 mitigation includes:</p> <ul style="list-style-type: none"> ✿ Proposing measures to increase urban tree canopy cover in appropriate locations. <p>I would suggest this is expanded to mirror the mitigation measure included in section on Health and Wellbeing that states:</p> <ul style="list-style-type: none"> ✿ Proposing measures to increase urban tree canopy cover in appropriate locations where pollutant dispersal will not be compromised. <p>Appreciating there will likely be a number of factors in determining species of tree planting in different environments it is worth noting information from the Royal Society and Air Quality Expert Group (advisors to Defra) in this respect and air quality [links provided].</p>		<p>Amendment to Air Quality bullet point on p52.</p> <p>Content to be added to PM38 Storymap on the selection of species for urban tree planting.</p>
136	<p>I would like to express general support for draft LNRS which I regard as very thorough and well argued. I particularly welcome the emphasis on cross border co-operation across the Carrant valley and the linkage of wood pasture between the two SACs notified for violet Click-beetle.</p>		Support noted and welcomed
137	<p>[Location provided] (Fen Marsh swamp polygon), Fen, include as Irreplaceable Habitat, and thus as APIB. N.B. Fen Areas at Kemerton Lake have already been included as APIB as they are in a LWS. Enhance all Fen areas under PM08.</p>		<p>PM8 mapping added in this location.</p> <p>WHI to be updated to record lowland fen in this location.</p>

Comment ID	Comment	Considerations	Action
138	[Location provided] (Fen Marsh swamp polygon), Fen, include as Irreplaceable Habitat, and thus as APIB. N.B. Fen Areas at Kemerton Lake have already been included as APIB as they are in a LWS. Enhance all Fen areas under PM08.		PM8 mapping added in this location. WHI to be updated to record lowland fen in this location.
139	[Location provided] Carrant Meadow. Reinstate floodplain of Carrant and Waterlet Brooks PM01. Remove PM03 as it already is Floodplain meadow. Add PM63.		Amendment made
140	[Location provided] Second Orchard. Remove PM02 from Traditional Orchard.		Amendment made
141	[Location provided] Aldwick Wood Add PM11. This is an SAC and SSSI, but according to the Draft LNRS p 15 it should guide 'Nature recovery on sites already of importance for biodiversity (for example Sites of Special Scientific Interest)'	Site is a SAC/SSSI so won't have Potential Measures mapped to it.	None
142	[Location provided] Welsh Furlong. Add PM12		Amendment made
143	[Location provided] Beggarboys fen. Remove PM12		Amendment made
144	[Location provided] All plantation woodland on Estate map. Add PM13 to all those areas where it is not already applied.		Amendment made
145	[Location provided] Delete PM33 wherever it appears in woodland.		Amendment made
146	[Location provided] Already wood pasture. Add PM19 to these fields. Note that all other existing wood pasture is already covered by PM19. Some of this is recent and certainly needs enhancement.		Amendment made
147	[Location provided] Already wood pasture. Add PM19 to these fields. Note that all other existing wood pasture is already covered by PM19. Some of this is recent and certainly needs enhancement.		Amendment made
148	[Location provided] I think PM20 should be removed from existing Wood pasture as shown on the Estate map attached.		Amendment made
149	[Location provided] Near Park certainly have more veteran trees than are shown on the map under PM21. I don't think they were ever recorded.	If trees haven't been recorded then unfortunately they won't appear on the Local Habitat Map. Advise ensuring that trees are submitted to the Worcestershire Ancient Tree Inventory.	None
150	[Location provided] Court Garden, certainly have more veteran trees than are shown on the map under PM21. I don't think they were ever recorded.	If trees haven't been recorded then unfortunately they won't appear on the Local Habitat Map. Advise ensuring that trees are submitted to the Worcestershire Ancient Tree Inventory.	None
151	[Location provided] Add PM22 along the Moretons roadsides to cover mature oak trees.	Mostly mature and pre-veteran. The individual veteran/ancient trees are mapped by PM21. PM22 was drawn specifically to capture the landscape between Bredon Hill and Dixton Wood.	None
152	[Location provided] All wood pasture. Add PM23.		Amendment made

Comment ID	Comment	Considerations	Action
153	[Location provided] Sling West. Add PM23.		Amendment made
154	[Location provided] The Bushes, West and East, which are cited in 'A nature Conservation Review'. They are SAC/SSSI -see Aldwick Wood above. Add PM23.	Site is a SAC/SSSI so won't have Potential Measures mapped to it.	None
155	[Location provided] Add PM55 to all lowland scrub (not the Bushes).	Scattered scrub habitat outside of the SAC/SSSI boundary mapped to PM55.	Amendment made
156	[Location provided] Delete PM33 wherever it appears in Wood Pasture.		Amendment made
157	[Location provided] Delete PM26 from southern part in Near Park, it is already PM19. Delete PM27. This parcel is either existing traditional orchard or parkland.		Amendment made
158	[Location provided] Upstone's Orchard, Add PM27 to South western section		Amendment made
159	[Location provided] The Runnings, Add PM03 and PM29 to whole field.		Amendment made
160	[Location provided] Little Meadow, Add PM29.		Amendment made
161	[Location provided] The Hollow, Add PM29.		Amendment made
162	[Location provided] (eastern polygon) Round Hill West, Add PM31.		Amendment made
163	[Location provided] Round Hill Mid, Add PM31 – already SSSI but see Aldwick Wood above.	Site is a SAC/SSSI so won't have Potential Measures mapped to it.	None
164	[Location provided] Tueswell Hill. Add to PM32. Of at least County importance and should be included in my proposed 'Rare Arable Plants Assemblage' PM. Remove PM19 and PM20. Add PM64 (rich in fumitory)		Amendment made
165	[Location provided] Oathill. Add to PM32. Of at least County importance and should be included in my proposed 'Rare Arable Plants Assemblage' PM. Remove PM19 and PM20. Add PM64 (rich in fumitory)		Amendment made
166	[Location provided] Pad Piece. Add to PM32. Of at least County importance and should be included in my proposed 'Rare Arable Plants Assemblage' PM. Remove PM19 and PM20. Add PM64 (rich in fumitory)		Amendment made
167	[Location provided] Kemerton Lake. Add PM57		Amendment made
168	[Location provided] Lake Meadow. Add PM63.		Amendment made
169	[Location provided] Collins. Add PM63.		Amendment made
170	[Location provided] The LNRS says that PM68 'Increase numbers of True Service Tree' is mapped, but I could not find it on the List of Individual Species Measures. We have one tree descended from the original Whitty Pear via Arley in SO9436 2296.	PM68 is unmapped and the data sheets have been corrected.	None
171	[Location provided] The map does not seem to show PM25 'Enhance wildlife value of younger and newly created orchards'. I have therefore included the replanted areas of my traditional orchards under PM26	All orchards marked on Kemerton map are mapped as PM26, which is correct.	None
172	[Location provided] My land at Upton Ham which is shown in the corner of the Estate Map should be PM08, PM29 and PM63 but is neither, presumably because it is SSSI. This does not seem in keeping with Draft LNRS p 15 – see Aldwick Wood above.	Site is a SAC/SSSI so won't have Potential Measures mapped to it.	None

Comment ID	Comment	Considerations	Action
173	From studying the LHM, comments on priority measures for each land area have been made. Requests for changes to priority measures have then been provided. We would be happy to discuss any of the requests in more detail if this is helpful:		
174	Ab Lench: Remove PM12 from Ab Lench LWS field (compartment 30) (<i>*redacted text*</i>). Include PM31 (if possible) as site has a mix of neutral and calcareous grassland. The LWS will continue to be managed and enhanced as a species-rich grassland.	Review PM mapping at this location	PM12 removed. PM31 extended.
175	Sheriffs Lench: Include PM31 as site has a large area of calcareous grassland (<i>*redacted text*</i>), if possible. Include PM27 - for compartments 1 (<i>*redacted text*</i>) and 23 (<i>*redacted text*</i>).	Review PM mapping at this location	PM31 added. PM27 added.
176	Naunton Beauchamp: For compartments 42 (<i>*redacted text*</i>) and 55 (<i>*redacted text*</i>) - remove PM12 and only map PM29. For compartments 32, 34, 38, 44 and 46 - remove PM12 and only map PM29 (but appreciate this may not be possible). For compartment 40 (<i>*redacted text*</i>) - include PM27.	Review PM mapping at this location	All changes made as requested
177	Honeybourne: Priority measures PM12 and PM29 - overlap. NO ADDITIONAL REQUEST MADE.		No change
178	Dorsington: Priority measures PM12 and PM29 - overlap. NO ADDITIONAL REQUEST MADE.		No change
179	Brown Hairstreak: <i>*redacted text*</i> landholdings of Roundhill Wood LWS, Ab Lench and Sheriffs Lench to ALL be covered by mapped measure PM56.	Review PM mapping at this location	PM56 mapping extended
180	Broad Marston <i>*redacted text*</i> . Outline location map attached - see black and white hatched area. Shape file to be created. Current land use is arable. Proposed land use change to native broadleaved woodland, wet woodland and wet grassland. EA data highlights there is a 1 in 100year flood risk across this land and there is the potential to provide natural flood management habitat creation opportunities. In addition to existing PMs (PM02) - map priority measures - PM12 and PM03.	Review PM mapping at this location	PM12 and PM3 added
181	<i>*redacted text*</i> . Plan provided showing potential habitat creation options on this area. Include mapping of priority measures: PM02 (riparian buffer), as it is now. PM03 (wet grassland / floodplain meadow) - extend mapped area, particularly the whole of the western field adjacent to the River Avon. PM08 (create and enhance wetland habitats), to cover the whole area, as there are opportunities to create scrapes, ponds and swales. PM12 (new woodland), to cover the northern half of the site from the central pond. PM 29 (neutral grassland), to cover the ridge and furrow field in the middle of the site. PM63 (create habitat for wetland / wading birds) (unless not an option with PM08)	Review PM mapping at this location	All changes made as requested

Comment ID	Comment	Considerations	Action
182	Are there higher levels of House Martin nesting activity on/near new build estates? Is this associated with easier access to 'mud' during the house building process and open ground with more bare soil and safer places to collect the mud? What can we learn from this?	Data is unavailable locally on whether House Martin nesting activity is significantly greater on new build estates in comparison to other housing estates, however research does indicate that birds that build nests on uPVC as opposed to brick, concrete or wood have much lower breeding success, with nests more likely to collapse on the plastic substrate. Modern construction materials deployed in newer housing estates may be a contributing factor in nesting success. Similarly, the substantial decline in ponds recorded both in Worcestershire and nationally since the second world war may require House Martin to forage for mud over greater distances in more recent years. The promotion of artificial nesting resources, pond conservation and restoration and more wildlife-friendly built environments in Worcestershire's LNRS will contribute in addressing these issues.	None



Comment ID	Comment	Considerations	Action
183	<p>Large amounts of habitat can be improved if we stop mowing hedges and verges so much. We need to ensure that land managers leave more verges and other land uncut for longer periods. This needs to include substantial areas of over wintered grass/vegetation, left uncut for a 15-18 months over winter on verges and in field corners etc. This is particularly for many insect species to bridge breeding seasons. Similarly leaving dead vegetation, grass, bramble and cow parsley stems will benefit remnant Harvest Mouse populations. Food and shelter is required for adequate numbers of small mammals to survive, themselves food for Kestrels and Barn Owls.</p> <p>In my view, Councils, Highways, farmers and on occasions the Malvern Hills Trust are all too 'tidy' and do not leave enough rough vegetation. In particular autumn/winter mowing of road hedges and verges is becoming harsher and more severe year on year. Bringing about change in these public sector organisations would quickly bring benefits and should be relatively straight forward to achieve. Educate the managers, councillors and staff/contractors.</p>	<p>In mapping actions for nature's recovery ('Potential Measures') DEFRA's guidance requires Responsible Authorities to spatially target the highest priorities for conservation, this prevents widescale mapping of more wildlife-friendly land management regimes.</p> <p>The LNRS identifies that intensive use and management of natural resources (including over-use of pesticides) is a driver of insect decline. A less intensive approach to grassland management is promoted through Potential Measure 63 which advocates for late hay cuts or strip-cutting over an extended period of several months. We also agree that the 'tidying-up' of public and private land is a pressure contributing towards insect decline. PM2, PM8 and PM23 encourage creation and enhancement of habitat mosaics: establishing and improving different habitat types and ages, which in turn will help provide shelter and foraging resources for invertebrates. PM38 also promotes creation of more urban 'mini-meadows' where less intense land management practice will provide biodiversity benefits.</p> <p>Positive management of the road verge network is an identified Biodiversity Priority and road verges are recognised as important ecological corridors, with positive land management promoted through, for example, delivery of Potential Measure 47. The County Highways Authority recognises the value of the road verge network for biodiversity and has adopted Plantlife Good Verge Management guidance in the timing and extent of road verge cutting to maximise its value for wildlife whilst ensuring highway user safety is preserved.</p>	Text added to page 41



Comment ID	Comment	Considerations	Action
184	<p>Swifts. The major area of decline in Worcs is most probably loss of nest sites. This will be ongoing as houses and buildings are improved; replacing fascias, soffits, gutters etc or buildings reroofed to improve insulation. Often this work is done without knowing that Swift nest there or that by doing the work nest sites are being destroyed.</p> <p>I think we need to have a substantial/comprehensive survey to find Swift breeding locations in the county. As a priority we need to identify the larger colonies. In most cases, but perhaps not all, we then need tell the owners that they are lucky enough to have Swifts and explain their importance and what they need to do or avoid doing to look after them and what to do if 'roof works' are planned. I think most sites are lost through owners not knowing, rather than by malicious intentions. Swift numbers will be maintained/improved more quickly by identifying existing colonies than by untargeted installation of nest boxes.</p> <p>'Swift Hubs' can be established by erecting small groups of boxes (2-10) plus callers on buildings managed by Swift friendly owners in locations with existing breeding Swifts. A similar process could be used on commercial buildings/new warehouses (where callers are less likely to be considered a nuisance).</p> <p>A focused well planned approach should be made to the Church Commissioners (?) to champion Swift conservation in their churches. They manage a county wide estate of churches many of which already have or could easily be adapted to host nesting Swifts. At present there is not a 'church' policy of protecting existing Swift nest sites. In fact it may be the case that building work has been given priority over conserving Swifts. Who in the Church is the figurehead who should sign up to a statement/policy to protect Swifts.</p>	<p>We agree that these are key drivers of decline for swifts. House Martin and Swift are priority species for the LNRS.</p> <p>Rather than risk duplicating and diluting citizen science survey and reporting efforts, the StoryMap supporting PM59 directs LNRS stakeholders to make use of the Swiftmapper map and survey guidance. This way future LNRS iterations can be informed by centrally collated and shared hirundine records.</p> <p>We agree that greater conservation benefit can be achieved by focusing actions where existing colonies have been identified, and the delivery of PM59 is spatially targeted using clusters of screaming party and nesting records.</p>	<p>Wording of PM59 has been amended and the mapping of the measure extended.</p>



Comment ID	Comment	Considerations	Action
185	<p>Please accept this email as a formal response to the Worcestershire County Council Local Nature Recovery Strategy Consultation. It concerns a field that my house backs on to in Malvern Wells, Worcestershire, which I'm surprised has not been included for any LNRS Potential Measures or recognised under the category 'Areas that could become of Particular Importance to Biodiversity'. I have therefore been unable to provide feedback via the map, hence this email which, hopefully, can rectify this situation. The attached 'Local Habitat Map.jpg' [provided] provides a screenshot of the LNRS Local Habitat Map with the field in question at the back of the Moorlands estate outlined in black and labelled 'Proposed Area'. The Potential Measures 'PM08', 'PM38' and 'PM23' have been checked and my house location is shown.</p> <p>My primary proposal for the field is under the Water and Wetlands theme with Potential Measures of 'PM08 Create and Enhance Wetland Habitats' and 'PM38 Wildlife habitats within the built environment' to be applied. This is based on the attached document 'The Moorlands Wetland - A Nature Based Flood Resilience Proposal' that I composed and submitted to the Worcestershire Country Council earlier this year [document provided]. I believe the field also provides important Habitat Connectivity from north to south allowing wildlife to pass between the Moorlands estate to the west, and the Three Counties Showground to the east. Therefore a secondary consideration under the Habitat Connectivity theme for a Potential Measure of 'PM23 Create and Enhance Habitat Mosaic' should also be applied.</p> <p>Having lived next to the field for the past 4 years, I have had the privilege to observe and photograph the wildlife at first hand. The fact the field has not been commercially farmed for the past 20 years, and is currently under an Agri-Environment Countryside Stewardship agreement with the landowner has allowed wildlife to thrive. The field at night is busy with muntjac and roe deer, badgers, foxes and hunting barn owls. The existence of a dew pond has provided water for mallard duck and even the exotic mandarin duck that breed in the nearby woodlands. During the summer the uncut hedgerows provide excellent nesting habitat for the local song thrushes, blackbirds, robins and migrants such as chiffchaffs, whitethroats and blackcaps. House martins in the local area also use the field as a food source especially for young in the autumn. Locally bred young kestrels and buzzards use the field to practice their hunting technique. During the winter months stonechats and meadow pipits from the surrounding hills frequent the field along with linnets, greenfinches and goldfinches. Over-wintering thrushes from Europe such as redwings, fieldfares and blackbirds make use of the thick hawthorn and blackthorn hedgerows. I have also observed other migratory bird species such as redstart, spotted flycatcher, lesser whitethroat, whinchat and tree pipit using the field and hedgerows to feed before heading off south in the autumn.</p>		Site reviewed and added to PM8 mapping.



Comment ID	Comment	Considerations	Action
186	<p>I am writing on behalf of *redacted text* to express concern that the current draft of the Local Nature Recovery Strategy does not adequately recognise the importance of Hartlebury Common Bog - a rare and ecologically valuable habitat that urgently needs proper attention and restoration. Hartlebury Common is already recognised as a Site of Special Scientific Interest (SSSI), but the bog area in particular holds unique ecological significance due to its specialist wetland flora and fauna, which are increasingly rare in Worcestershire and beyond. This habitat supports a rich diversity of species, some of which are in decline nationally, and its preservation should be a priority under any credible nature recovery strategy.</p> <p>Unfortunately, over the last 20 years or so, this bog has suffered from ongoing degradation and important plant species have already been lost, for example, the Round-leaved sundew. Key issues such as lack of appropriate hydrological management, encroachment by scrub and bracken, and the absence of targeted conservation efforts have all contributed to the decline in condition and biodiversity value of this habitat.</p> <p>The LNRS must include specific recognition of Hartlebury Common Bog, not just as a designated site but as a priority for ecological restoration. This includes setting out clear actions for its recovery - including hydrological restoration, appropriate grazing or vegetation control, and long-term management funding. Failing to include and address this in the strategy would be a missed opportunity to protect one of Worcestershire's last remaining lowland bog habitats, and to demonstrate meaningful commitment to nature recovery.</p> <p>Thank you for the opportunity to comment. I hope this feedback will be taken into account in the final version of the LNRS.</p>	<p>Hartlebury Common and Hilditch Coppice SSSI is mapped as APIB. The LNRS cannot map Potential Measures to Hartlebury Common that duplicate the statutory management plan or Natural England's published Views About Management, and this includes measures regarding the restoration and management of the valley mire or bog.</p>	<p>Text to be added to page 21 and 65 of the strategy to emphasise more strongly the importance of Hartlebury Common Bog and of taking action to restore hydrological function to protect and enhance the habitat.</p>
187	<p>*redacted text* proposes that the Local Nature Recovery Strategy should include a recommendation that local planning authorities consider the following changes to planning policy:</p>		
188	<p>1. That a greater priority be given to the protection of biodiversity by requiring designated buffer strips around SSSIs and historic woodlands and meadows.</p>	<p>Due to mapping area coverage thresholds imposed by DEFRA, we are not able to impose meaningful buffer areas around every SSSI in the county, and buffering these features adequately is a function of Local Development Plans and Natural England. Nevertheless, we're supportive in principle of advocating for more wildlife-sensitive land-use to buffer Worcestershire's sensitive habitats, and this can be achieved through measures including PM2, 7, 8, 12, 22, 23, 24, 29, 30, 31, 42 and 44 which aim to defragment existing high value habitats through new habitat creation. Additionally, supporting StoryMaps provide a broader evidence base than LNRS is permitted to present in its Local Habitat Map, including mapping Worcestershire's Long Established Woodlands.</p>	<p>None</p>



Comment ID	Comment	Considerations	Action
189	2. That developers are required to transfer ownership of green spaces in new developments to either the parish council or a company owned by the residents.	Requiring developers to transfer ownership is outside the legal scope of LNRS.	Content to be added to PM39 StoryMap about ensuring long-term positive management of green spaces for biodiversity.
190	3. That local plans identify where green spaces in new developments can be pooled to develop larger wildlife reserves.	Pooling greenspace might provide a more economically manageable and ecological coherent quantum, but would conflict with LNRS and national objectives to thread opportunities for equitable access to semi natural greenspace within our communities (eg the national GI Standard's '15 to green' principles). LNRS aims to bring nature into our built environment and promote access to nature for health and well-being which pooling greenspace allocation could potentially undermine. Nevertheless, where the benefits of strategic delivery of greenspace outweigh ecological impacts this remains a suitable mechanism, as exemplified by the proposed creation of new country parks in the emerging SWDPR to compensate for anticipated anthropogenic pressures on the Malvern Hills SSSI. The appropriate mechanism for strategic compensation measures remains Local Development Planning and Protected Site Strategies.	None
191	4. That there be a buffer strips between new developments to provide wildlife corridors.	Supportive of this proposal.	Add wording to Potential Measure 38 to reflect this
192	5. That BNG calculations be carried out by ecologists independent of and not funded by the developer.	Assigning responsibility to specific parties to undertake ecological survey work is beyond the legal scope of LNRS.	None
193	*redacted text* also proposes that the Strategy should confirm the decision of the Malvern Hills National Landscape Board that the landscape boundary be extended Northward from the Suckley Hills to include the continuing range of hills as far as and including Abberley Hill. This would protect a distinctive and thinly populated area of ancient woods, hills and meadows.	Advocating for modifications of landscape designations is beyond the legal scope of LNRS.	None
194	P10: add 'Canal' to Water and Wetlands priority theme graphic - as canals are classed as priority status within the Worcestershire Habitat Inventory and this should be reflected in the LNRS document.		Wording of the Biodiversity Priorities and title of this theme amended.
195	P19: request that Canal and River Trust website be added to list of organisation resources.		Add Canal & River Trust website to list on p19

Comment ID	Comment	Considerations	Action
196	P20 - Canals are also important for conservation and migration of eels.		Add text to p20
197	P24 - Mention of orchards - scope to expand orchards along the canal network within the county.	Potential Measure 27 maps targeted areas for the creation of new orchards based on habitat modelling that indicates where connectivity between existing orchards can be enhanced. This does not prevent new orchards being created in other locations.	None
198	P25 - Should canals not be mentioned in the section titled "Urban Habitats"?	Canals are already mentioned in this section.	None
199	P65: add in Canal reference to wetland habitat.		Amendment to text on p65
200	P74: if possible, would like to see inclusion of canal network and reservoirs reference in North Worcestershire and WMCA border and North Worcestershire and Staffordshire border locational write-ups.		Add text to p74
201	P79: Canals need to be added to water and wetland's theme with biodiversity priority inclusion (again, as listed under priority on Habitats Inventory and this should be reflected here)		Wording of the Biodiversity Priorities and title of this theme amended.
202	In addition to the above, *redacted text* request that the document should highlight the importance of canal corridors as connecting habitats that link other areas of wildlife interest.	The importance of the canal system as a linear part of the green/blue infrastructure network is referenced throughout the document e.g pg 20, 69.	None

Comment ID	Comment	Considerations	Action
203	Potential planned Ecological Corridors are referred to in the LNRS but not mapped.	Worcestershire's Nature Recovery Network, or 'ecological corridors' are a key part of the data-driven evidence base underpinning the LNRS. The contribution of the network to the mapping of Potential Measures is explained in the relevant accompanying Storymaps. Not all ecological corridors have been mapped with a Potential Measure in the Local Habitat Map and so many will not appear as "Areas that Could Become of Particular Importance to Biodiversity" ("ACB"s). DEFRA have been clear that non-mapped measures are of equal importance to mapped measures (eg ecological corridors are promoted for conservation in Supporting Activity 10). Where conservation of existing corridors such as hedgerows, site boundaries and dark corridors are promoted within LNRS's Potential Measures, supporting evidence is presented within each Potential Measures' StoryMap (eg PM28, PM38, PM42, PM50 and PM60).	None
204	No clear LNRS statement on the ending of glyphosate herbicide use by WCC. This continues to be used in Redditch, as is seen by scorching on grass verges, utility access points and lamp post bases. It has a proven toxicity to animal life. These existing corridors are recognised in the LNRS, but the use if herbicides is killing the wildlife. Other Local Authorities have banned their use.	The over-use of pesticide, herbicide and fungicide is identified in the LNRS as a threat driving the decline of biodiversity. LNRS will not conflict or constrain bans implemented by Local Authorities preventing the use of glyphosate.	None
205	The WCC Cabinet Member with responsibility for the implementation of the LNRS, Mr Ian Creswell, has a stated lack of belief in the scientific and technological evidence for climate change; a fundamental element of ecological forward planning that is recognised in the LNRS. He signed the document. What are Worcestershire residents supposed to glean from this?	Worcestershire's LNRS recognises the threats and pressures posed on nature's recovery by the effects of climate change. Climate change adaptation and mitigation measures informed the design and development of LNRS's Potential Measures and underpin the strategy's Headline Principles.	None
206	I propose that Smithmoor Common becomes blue on the map: PM03 Revert land to Wet Grassland and floodplain meadow		PM3 mapping extended
207	The requirement to seek detailed advice and guidance and undertake site specific checks needed more detail, particularly with reference to detailing what to seek guidance on and what regulations and constraints to check for. Namely, environmental, historic/archaeological & landscape. This is sometimes referred to as the overarching caveat.		Text amended on page 13 and 86

Comment ID	Comment	Considerations	Action
208	No mention of Big Chalk		Added to text on page 33
209	Dry stone walls were not sufficiently recognised as a habitat. Opportunities offered by the historic environment too.		Added to text on page 73
210	Please add national landscapes to the boundaries layers [of the Local Habitat Map]. We would find this particularly helpful.	Agreed.	Add NL boundaries as suggested.
211	All in all the granularity and quality of the mapping along with the selection and treatment of measures was excellent. We did feel however that the mapping of layer PM12 Plant New Woodlands and trees Outside Woodland within the Cotswolds National Landscape did not reflect the priorities within the Cotswolds National Landscape Management Plan and Nature Recovery Plan. I attach two screen grabs of our mapping for land with the potential to make a high or medium high contribution to the Cotswolds grassland ecological network. We would like to see measure PM12 removed from the area coincident with these mapped high and medium high grassland priority areas. I can provide the shapefiles if this is helpful. I note that other measures including creating new wood pasture and parkland habitat, enhancing landscape connectivity for species using veteran trees & enhancing & creating mosaic habitat will all also include introducing new trees, shrubs and small areas of woodland into the landscape in these areas. As these measures also include a grassland habitat element they can be implemented without damaging the actual or potential grassland ecological network and are supported.	Bredon Hill: PM12 mapping in this location is very constrained. PM31 mapping is far more extensive. Woodland, scrub and veteran tree habitat on Bredon Hill is a designated feature and important for the conservation of saproxylic insects. The overlap of PM12 and PM31 is minimal. No changes made. Fish Hill: PM12 coverage reduced here in favour of PM31 (removing overlaps).	PM12 coverage amended
212	Page 2: This reads as if we are only asking for little changes. It's good content but should be preceded with something more ambitious. Something like: "Securing the recovery of nature will require significant changes in the way large areas of land and water are managed. This strategy identifies the most effective places for these changes to take place."	Existing text is that approved by the Cabinet Member for Environment.	None
213	Page 8: This raises the question as to why only a third of the existing nature network counts towards 30X30. If not included below, there needs to be an explanation in the final LNRS. Maybe a footnote along these lines "a lot of existing good habitat does not count towards 30x30 under the current criteria as these criteria include factors such as the security of future positive management." Include a link to the Defra 30x30 criteria. Again we should be setting our own targets for the area of habitat required across the county based on the ecological need for a viable nature recovery network, free of the limitations of national policy & criteria.	This is already set out in more detail in section 3.4	None
214	Page 9: [...or expansion of their range] "in addition to the habitat based measures already included."		Text added to page 78
215	Page 13: [monitoring and reporting on delivery of LNRS]. I think this is fine but worth raising that most monitoring will be most effectively achieved by "following the money" esp. agri-env & green financing inc. BNG. Most of this data collection will be best undertaken nationally. An LNRS monitoring framework would best be based on national data collection supplemented with additional local data to capture work outside of the main funding mechanisms. One for next year!	Comment noted	None

Comment ID	Comment	Considerations	Action
216	Page 13: The 'caveat' paragraph is a bit vague. It could do with strengthening and including a few examples. "For all detailed decisions about habitat management or creation on any particular site, the general recommendations of this strategy should be supplemented with site-specific advice from ecologists, land agents, land managers and the Historic Environment Record, and within protected landscapes the National Landscape teams." Seeking site specific advice and guidance along with complying with relevant regulations should be a first overarching measure that comes up every time the map is interrogated or the measures document looked at.		Text amended on page 13 and 86
217	Page 15: Is this the purpose [of LNRS]? It reads more like how it works & repeats earlier content. How about: "The core purpose of the LNRS is to collectively agree the best actions in the best places to deliver the recovery of nature, and to drive effort and resources to make these actions happen."	The existing text uses the language within LNRS statutory guidance	None
218	Page 15: good to see road and rail highlighted. Missing from the list - owners and managers of woodland and parkland. These can be quite distinct from farmland.		Text added to list of 'non-farming businesses'.
219	Page 19: For wider understanding of the county's geology could add a link to the BGS geology Viewer https://www.bgs.ac.uk/map-viewers/bgs-geology-viewer/		Add to State of Nature Geology Storymap
220	Page 22: "The high invertebrate content of wet woodlands makes them important to insectivorous birds which have undergone significant declines in recent years."	Specific bird species are already mentioned here	None
221	Page 23: "Scattered scrub within grazed fields can provide provide shelter and increase resilience to extreme drought and heat events. Research has shown that wildflowers can reduce or cease nectar production under drought conditions and some invertebrates cease activity in extreme heat."		Text added to page 66
222	Page 25: This section of the LNRS reviewing habitats and species is good. However, whilst it describes loss of habitats it does not mention loss of species e.g mole cricket.	A number of key threatened and declining species in Worcestershire are highlighted on page 35	None
223	Page 26: This analysis needs a section outlining the current extent of habitats by broad habitat types & then how much additional habitat is required. Suggest aim for a minimum of 40% of area within protected landscapes and 30% outside - this fits with relevant scientific papers. I can share if wanted. Ideally we should have quantified targets for the extent of additional habitat required broken down by broad habitat type, similar to that included within the Cotswolds Nature recovery Plan: https://www.cotswolds-nl.org.uk/our-work/nature-recovery/cotswolds-nature-recovery-plan/ I believe this to be essential for setting the quantified ambition for the recovery of nature. Unfortunately LNRSs have not been required to do this at this stage. I am happy to discuss this exercise as we move towards delivery.	LNRS preparation does not require setting numerical habitat targets	None
224	Page 28: Yes this is what Defra wanted - APIBs by designation. More helpful in planning nature recovery to map areas & set targets by broad habitat types.	Comment noted	None
225	Page 29: OK and in the context of this section of the LNRS i.e factual information. However, Protected Landscapes can be a constraint on proposals for nature recovery. So far constraints have been dodged in the LNRS.	Comment noted	None

Comment ID	Comment	Considerations	Action
226	Page 31: may need to explain 'forest' [of Feckenham] otherwise does not make sense when describing the lowland meadows, orchards, parkland and only scattered blocks of woodland.	The explanation is within the text, but could be clarified for readers.	Add to glossary
227	Page 31: as with a number of the landscapes important for biodiversity described in this section, they don't stop at the county boundary. This is an important point to make and helps set Worcs in the wider area and is key for continuity and linking with neighbouring LNRS.	Cross-boundary/landscape-scale projects and initiatives are extensively covered in section 3.6	None
228	Page 33: Bredon Hill is additionally internationally important for deadwood invertebrates associated with veteran trees.	This is already explicit within the strategy e.g. page 73	None
229	Page 34: could mention land tilled for arable plants here.		Text added
230	Page 38: Good to see that the damage to ancient grassland habitat from woodland planting is recognised in the LNRS. Please resist any pressure to remove this.	Comment noted	None
231	Page 40: This misses the most significant point of climate changes impact on wildlife. Climate change is nothing new and our wildlife has successfully adapted to it many times over previous ice ages and warming interglacial periods. Species adapt by moving to a new "climate space" or changing their "niche". However this time human made climate change is greater in both speed and extent and our already diminished wildlife has to move across a largely hostile landscape. This is the greatest single threat and challenge to nature and it adds a strong sense of urgency to the creation of a fit for purpose ecological network.		Text added
232	Page 41: [...feed increasing population] and keep food prices low		Text amended
233	Page 41: [...may fail to recognise] delete 'may'. There is, of course, a minority who recognise this loss, so could replace 'may' with 'frequently' to reflect this.	Comment noted	None
234	Page 43: Thank you! [for inclusion of CNL Nature Recovery Plan]		You're welcome
235	Page 43: should this be - targets to deliver the PLTOF. [In reference to MHNL targets and outcomes framework]		Text amended
236	Page 44: [recovery of] "nature".		None
237	Page 47: Whilst the BNG section is factually correct, it comes over as assuming that if a BNG proposal is within a potential measures area, all is OK. There are still other considerations such as historic environment, landscape etc and BNG can still be subject to EIA screening. An "overarching caveat" measure along these lines would address this.		Text added to page 46
238	Page 49: Objectives and targets?	These are termed objectives within the Environmental Improvement Plan.	None
239	Page 49: Have you considered the suite of biodiversity targets for protected landscapes included within the Protected Landscape Targets and Outcomes Framework? They are partly but not entirely derived from the ones already listed and cover a significant part of the county. Would make for a helpful third table.		Table added to strategy document

Comment ID	Comment	Considerations	Action
240	Page 52: The reader might expect carbon dioxide to be concluded here and not including it could be seen to contradict a lot of the other messaging in the LNRS. I sentence explaining how co2 is treated in the LNRS & why it is not included under air pollution could be helpful. This [third] paragraph belongs in the section on threats and pressures rather than other environmental benefits.	Carbon dioxide is very relevant to climate change/global warming, but not air quality per se in terms of airborne emissions that damage human health, which is the focus of this section.	None
241	Page 53: as highlighted above, there are saline habitats in Worcs. Maybe a minor point but would help with consistency.	The data reported here are inclusive of all waterbodies in Worcestershire	None
242	Page 53: Move to flood risk section or add text explaining why this helps water quality. This applies to the last 3 bullet points here.	There is intentional repetition within the wider environmental benefits chapter as the positive outcomes to be achieved from the delivery of Wider Environmental Benefits (WEBs) are not mutually exclusive to one WEB only and PMs are referenced in all sections where they can potential contribute to delivering that WEB.	None
243	Page 54: References to flooding and impacts on wildlife in these two paragraphs are repetitive & ought to be moved to the relevant sections. These first two bullets seem to be about flooding not availability. Move to the section on flooding	There is intentional repetition within the wider environmental benefits chapter as the positive outcomes to be achieved from the delivery of WEBs are not mutually exclusive to one WEB only and PMs are referenced in all sections where they can potential contribute to delivering that WEB.	None
244	Page 55: What happens in Worcs impacts on land and communities downstream beyond the county boundary e.g in Gloucestershire.		Text amended
245	Page 56: [healthy soil] also holds more water (contributing to flood management and drought resilience)		Text amended
246	Page 56: [...grassland reversion in the floodplain] or on slopes prone to erosion		Text amended
247	Page 57: Start with a paragraph outlining why carbon sequestration is important. Climate impacts on people locally and globally. Impacts on wildlife should be dealt with under threats and pressures. The -1 figures are distracting, is this a variation, + or - 1 or an old footnote reference? not sure what it means.	This is explicit enough within the text. Tonnes/per hectare-1 is the scientific unit of measurement. -1 should be superscripted.	Text amended
248	Page 58: Propose measures to increase structural diversity within woodlands such as glades, rides coppicing and re-wetting.		Text amended
249	Page 58: There must be research or data on the decline of all invertebrate abundance that would further strengthen this section. I recall something about windscreen monitoring for example.	Comment noted	None

Comment ID	Comment	Considerations	Action
250	Page 59: Not adaptation & repetition [in reference to woodland planting and floodplain meadow restoration]	There is intentional repetition within the wider environmental benefits chapter as the positive outcomes to be achieved from the delivery of WEBs are not mutually exclusive to one WEB only and PMs are referenced in all sections where they can potential contribute to delivering that WEB.	None
251	Page 60: [Being in nature] Delete “being in”, just reads a bit strange. I don’t understand this sentence. Hearing birdsong is leading to the extinction of natural experiences? Restructure.		Text amended
252	Page 60: Does tree canopy prevent the dispersal of pollution? Tis conflicts with usual line that trees absorb pollution. Explain or redraft,	Yes, trees can prevent the dispersal of pollution in specific urban situations by exacerbating an effect known as ‘canyoning’, where pollutants are trapped at ground level and are unable to disperse. Poorly planned tree planting in urban situations, in particular dense street tree planting, can contribute to localised poor air quality. Advice was taken from Worcestershire Regulatory Services on the wording of this section.	None
253	<p>Page 62: This misrepresents the research. The 30% of habitat still needs to be suitability located to allow dispersal. Rather than 30% of habitat located anywhere being enough, it is 30% of suitably located habitat that is required to deliver dispersal. This is actually the point behind the LNRS mapping! [30 by 30 can be achieved] ‘can only be achieved’ may be better.</p> <p>Defra have developed further guidance on 30 by 30. This includes a points based system for assessing an adequate level of protection. I was told the other week that this guidance should be published in the autumn. This should reduce the amount of land excluded from 30 by 30 under the protection criteria. You may want to revisit this section when this guidance is published.</p> <p>I am worried about the emphasis placed on 30 by 30. Due to onerous criteria not lest under protection, 30 by 30 is not a suitable proxy for measuring a viable local nature recovery network. You should make this clear and perhaps illustrate this by comparing the current 30 by 30 land figure with the current extent of PHI habitat. Too much good habitat is excluded. 30 by 30 It will drive resources towards nature recovery so it is good to include within that context but care must be taken to make it clear that 30 by 30 land is a subset of the local nature recovery network on the ground. The LNRS should focus on the actual nature recovery network not 30 b y 30 land for LNRS target setting and monitoring.</p>	The timetable for LNRS publication may not allow for this. If available in time, the Defra guidance will be reviewed and taken into account in the final strategy text. Otherwise, a separate review may be undertaken and published.	Text amended
254	Page 65: This is an “other environmental benefit” not an opportunity for nature recovery [in relation to ‘reduce or mitigate the impacts of frequent flooding’]	It is an opportunity for nature because there is an additional driver there to achieve it.	None
255	Page 67: Turtle dove illustrated under woodlands but it is mentioned under open habitats. Also are you going to add captions to identify species in photographs	Turtle dove image accompanies the section on traditional orchards, a habitat which they are recorded using in Worcestershire.	Captions to be added

Comment ID	Comment	Considerations	Action
256	Page 69: Greenspace created as a requirement of development consent needs to be better designed and managed. All too often it is simple and cheaply executed to reduce the costs to the developer. Management is also poor, both by the developer and by the organisation managing it on behalf of the community/authority it is passed on to.	Agreed. The LNRS contains Potential Measures 38 and 39 which relate to this matter. It is beyond the scope of LNRS to require particular organisational structures for managing urban greenspace.	None
257	Page 69: Artificial light can also have significant impact on rural habitats	Agreed. Potential Measure 45 addresses ALaN in the countryside.	None
258	Page 71: You should add something about Big Chalk in the section. https://www.big-chalk.org/ The Big Chalk programme area covers a large part of the county and its whole purpose is to deliver nature recovery at scale across political boundaries. I will send a Big Chalk LNRS guidance note along with these comments.		Text added to page 73
259	Page 71: [conserving and enhancing natural beauty] and the special qualities.	Noted, the focus here is on nature, rather than wider special qualities.	None
260	Page 71: It would be good to mention the National Landscapes Nature Recovery Plans here.	The NL Nature Recovery Plans are included in section 2.5.	None
261	Page 72: No mention of CNL and Cotswolds NCA. Bredon Hill is a Cotswolds outlier but included in the Severn and Avon Vales NCA	Addition of text on CNL and Big Chalk addresses this	Text added to page 73
262	Page 72: area should be in hectares to be consistent with the rest of the LNRS. [HOEF landholdings]	HOEF report their landholdings and forest creation targets in acres. LNRS maintains consistency with this.	None
263	Page 76: Measures in the wider landscape beyond areas of existing or created habitats is missing as are measures targeted at species. These combined with the first headline principle cover all elements of a fit for purpose nature recovery network. Without them it is incomplete.	Potential Measures in the wider landscape are applicable to many of the headline principles. The LNRS contains 29 priority species or species assemblages with associated measures so disagree that these are missing.	None
264	Page 80: Looks like we are allowing duplication under this measure e.g. orchards so could also mention wood pasture here [Biodiversity Priority 9]		Text amended
265	Page 80: Increase the condition and extent. You have included the measures that improve condition so also include it in the priority. [Biodiversity Priority 15]		Text amended
266	Page 80: inconsistent bold added to text [Biodiversity Priority 20]		Text amended
267	Page 81: set-aside is now a rarely used term. It harks back to compulsory set-aside to reduce overproduction and surpluses that ended in 2008. I suggest finding a different term or just deleting it and stopping at headlands. [Habitats associated with arable farmland sub-theme heading]. Agreed - sat aside is unpopular with farmers and conservationists alike. Best not used.		Text amended

Comment ID	Comment	Considerations	Action
268	Page 82: Nature Recovery Network needs defining in the glossary. I think in this context that it means the network with all the different elements as defined in Making Space for Nature. It could also be taken to mean the mapped existing areas plus the mapped area of potential measures within this LNRS. Without a definition it is not clear which. I favour the former.		Text amended
269	Page 82: Opportunities for additional rock and scree habitats created by extraction industries and development (e.g. road cuttings)	It is beyond the scope of LNRS to direct where these types of exposures might be created.	None
270	Page 83: Additional priority to improve the management of greenspace created as part of development.	The LNRS focuses on supporting the provision or enhancement of nature-rich habitat within the built environment that has a dual greenspace function. The existing Biodiversity Priorities 40, 41 and 42 are considered to be sufficient in doing this. The provision and management of greenspace per se is not within scope of the LNRS.	None
271	Page 86: As highlighted in the Introduction, this sentence is too weak and needs to better recognise other considerations/constraints (and regulation). "It is important to seek site specific ecological, archaeological and within National Landscapes, landscape advice when developing a proposal." [in relation to the 'caveat']		Text amended
272	Page 86: "These are the locations where the mapped measures are most likely to achieve the best outcomes. This may be due to their proximity to existing habitat, location within the Nature Recovery Network or particular local conditions The LNRS had to prioritise the best areas, so these measures may still be beneficial in other locations".		Text amended
273	Page 87: Background design of swirls is interfering with the smaller font size in the tables.		Noted
274	Potential Measure 1: avoid the need for culverts in new development and better designed culverts, where needed for infrastructure schemes e.g. road construction.	Text doesn't fit within re-worded PM1. More suited to PM38.	Wording added to PM38
275	Potential Measure 2: woodland, grassland or mosaic - otherwise does not match with the 4 habitats below.		Text amended
276	Potential Measure 7: restoring and creating additional ponds. Ponds lost to silting up or infilling are usually in good locations - otherwise they would not have been there in the first place. Agreed. "Excavating ponds in historic pond locations to a point that retains the original pond bottom can result in the re-occurrence of wetland plants from the seed-bank." Paleo or ghost ponds.	The targeted mapping of PM7 is informed by ArchAI's Lost Ponds dataset. The methodology is set out within the PM7 Storymap.	Amend PM wording to better reflect this aspect of targeting.
277	Potential Measure 10: Yes, but FC are promoting the use of non-native species to increase resilience to climate change and disease, hence seeing species such as Italian alder and Norway maple in restocking mixes following felling. Whilst provenance can help, sticking to native species may not be practical in the longer term. If it's removing conifers - say so.		Text amended
278	Potential Measure 11: including non-natives? see comment on 10 above.		Text amended

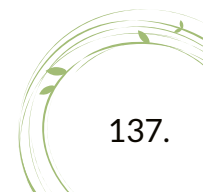
Comment ID	Comment	Considerations	Action
279	Potential Measure 12: "Plant shrub species to create woodland edge habitat along the external woodland boundary as well as along internal ride and glade edges." "Plant" is a limiting term. Natural woodland regeneration is widely considered to be ecologically preferable to tree planting. Create would be better with a note in the detail saying that natural regeneration is preferable to planting. "Consider creating new coppice woodlands at the woodland design stage". New woodland and ToW where appropriate, even within mapped areas.		Text amended
280	Potential Measure 13: All the actions to improve structural diversity listed for ancient woodlands under measure 11 also apply to enhancing the condition of these woods and should be included here. Thinning, coppicing, rides and glades apply to all not just ancient woods.		Text amended
281	Potential Measure 14: another 'where appropriate' measure.		Text amended
282	Potential Measure 15: specify 'grey squirrel'		Text amended
283	Potential Measure 16: Ok for most or Worcs. However, there are dry stone walls on Bredon Hill and Fish Hill/Broadway area which should not be replaced or supplemented by hedges.		Text in main strategy amended to include mention of dry stone walls as a locally distinctive landscape feature in these areas.
284	Potential Measure 17: Hedge laying and coppicing and gapping up of moribund hedges are also good for enhancing condition.		Text amended
285	Potential Measure 20: Overseeding grassland with appropriately sourced seed can be used to enhance existing wood pasture where appropriate (the grasslands are often semi-improved, particularly in wood pasture remnants in old parkland). It can certainly be used to get the grassland element off to a good start in the creation of new wood pasture and parkland habitat. As for woodland creation, where appropriate, even in mapped areas.		Text amended
286	Potential Measure 21: I added the below then found it addressed in the next measure (22). Perhaps just delete pre-veteran from this measures title to provide clarity between the two. The measure title mentions pre-veteran trees but the detail only talks about ancient and existing veteran trees. Need to add something about veteranisation of pre-veteran trees by introducing veteran features. Important to maintain continuity of veteran tree features across the landscapes during potential age gaps.	PMs 21 and 22 have a different purpose and are mapped to differently targeted locations.	None
287	Potential Measure 23: I'm not clear on what the "Worcestershire Habitat Mosaic Nature Recovery Network" is. I can't find a separate piece of work which should be referenced with a footnote & link here if it exists. If this is the "PM23 Create and Enhance a Habitat Mosaic" mapped layer it would help the reader to use the same title here.	It is the same as the mapped PM23 layer on the Local Habitat Map.	Reference to Worcestershire Habitat Mosaic Nature Recovery Network removed from the wording of the measure for clarity.
288	Potential Measure 24: Could also include creating a varied structure within large blocks of scrub by introducing rides, glades & scallops & creating a varied scrub structure by rotational cutting.		Text amended
289	Potential Measure 27: should this be create new traditional orchards or does it intentionally include new commercial type orchards. Commercial orchards are transient in nature and use a lot of pesticides.		PM title and wording amended.

Comment ID	Comment	Considerations	Action
290	Potential Measure 31: Not convinced by adding orchards and ponds. Orchards are a different habitat and associated with neutral grassland. Ponds on calcareous soils - too free draining particularly oolite. Ponds with neutral and acidic grassland - fine.	Wording of the measure denotes creation of these associated habitats if appropriate.	None
291	Potential Measure 32: cultivated headlands. Not just margins and cultivated headlands. Some farms (in the CNL at least) are moving to low or zero use of pesticides providing potential for arable plants. Likewise, organic arable, which relies on traditional cultivation, provides opportunities. Same for measure 33 below.		Text amended
292	Potential Measure 33: cultivated headlands		Text amended
293	Potential Measure 34: See comment above on set-aside. Rotational ley, including herb-rich ley is probably what is meant. No such thing as permanent ley (or set-aside). Calcareous, neutral and acidic grasslands and heath.		Text amended
294	Potential Measure 36: cover crops		Text amended
295	Potential Measure 37: Is this the best place to add something about dry stone walls or should there be an additional measure? Dry stone walls are an important habitat for a range of reptiles, mammals and plants. They should be maintained and restored where they are traditionally found in limestone areas. They should not be replaced with hedgerows.	This measure is not about man-made built features, but natural or created (e.g. through quarrying) geological exposures.	Text in main strategy amended to include mention of dry stone walls as a locally distinctive landscape feature in Cotswolds NL.
296	Potential Measure 38: retain existing features such as hedgerows, trees, ponds, road verges etc incorporating them into the design of new development.		Text amended
297	Potential Measure 42: should 50m be a minimum?		Text amended
298	Potential Measure 43: could be under as well.		Text amended
299	Potential Measure 46: introduce lighting curfews where lighting such as streetlights are turned off late at night. Retrofit with shields etc	It is beyond the scope of LNRS to be this prescriptive. The wording of the measure already refers to the use of timers or sensors.	None
300	Potential Measure 57: establish new populations at suitable sites?	Wording of the measure refers to the establishment of ARK sites. It is currently unrealistic to expect successful reintroductions to sites other than these without a means of controlling crayfish plague.	None
301	Potential Measure 58: This is where including under-passes in measure 43 would be helpful.		None
302	Potential Measure 63: electric fencing around nests to reduce predation. Avoid tree planting to avoid encouraging avian predators.		Text amended
303	Potential Measure 65: Best avoid "set-aside". In the Cotswolds Nature recovery Plan we say "Overwinter stubble, seed-rich winter cover crops using wild bird seed mixtures and unsprayed and unharvested arable headlands." Worth specifying wide margins. Wide margins draw corn buntings and yellow wagtails to nest in them avoiding incidents of nest damaging that can occur within the crop. Yellow wagtails have a tendency to nest in the tramlines.		Text amended

Comment ID	Comment	Considerations	Action
304	Potential Measure 69: add female trees to populations of male trees. It's usually only male trees that have survived. Any local or introduced stock should be genetically tested.		Text amended
305	Potential Measure 74: and other evergreens such as holly and yew.		Text amended
306	Supporting Activity 1: and horticulture.		Text amended
307	Might be seen as controversial but one way to encourage and support the management of grassland GI habitats and road verges is by AD energy production. It could also support PHI neutral grassland/lowland meadows where grazing is not viable.		Case study to be added to relevant PM Storymaps
308	Suggested additional activity. Title: Treat ancient grasslands as irreplaceable habitat. Text: The national definition of irreplaceable habitat is widely recognised as inadequate and is currently under development. In the meantime local policies could extend the definition to include ancient grasslands with a working definition of "Ancient unimproved grassland (surviving since 1945)". Note - this definition is included within the Cotswolds National Landscape Management Plan 2025 - 2030.	LNRS cannot define Irreplaceable Habitat.	A new species assemblage priority has been added to the LNRS - Waxcap and other Grassland Fungi - which includes the action to document and survey the county's old grasslands.
309	Page 108: Supporting funders including those developing green finance initiatives to target their funding where it will achieve the best outcomes for the recovery of nature.		This to be added to expanded text on p109.
310	Page 109: Does this need revising in the light of the coming local government reorganisation? It is envisaged that LNRS delivery will come under the new combined authorities.	This is an important message to include here. Local Government reorganisation is already referenced in this section.	Text on this page to be amended with latest detail of the LNRS delivery role.
311	Page 110: [sources of published information] PL projects e.g.CGC and PLToF? Might be creating a rod for own back - PLTOF data is cut to PL boundary and not further divided by LA area.	This needs a more detailed conversation with CNL and MHNL. Defra have committed to providing RA's with nationally collected/ publicly funded data outputs e.g. future agri-environment schemes. Unclear as to whether this will include PLTOF data.	None
312	Glossary - climate change: Adaptation will involve moving across the landscape for many species which is one the reasons we urgently need to develop the county's nature recovery network.		Text added to climate adaptation section on page 59
313	Glossary - agri-environment schemes: spelling		Text amended
314	Add AONB to glossary	AONB is written in full on page 29 and what they are is explained within the text.	None
315	Glossary - connectivity: Both corridors and islands of new habitat can improve connectivity.		Text amended
316	Glossary - ecotones: Ecotones are particularly species rich habitats as they contain features of both the habitats they border along with additional features only found in the ecotone itself.		Text amended
317	Glossary - habitat mosaic: Replace with: An area composed of different habitat types in close proximity, particularly rich in ecotone habitats and supporting a wider range of species and ecological functions. At a large landscape scale, can become a mosaic of habitats rather than habitat mosaic.		Text amended

Comment ID	Comment	Considerations	Action
318	Glossary - Nature Recovery Network needs defining - see note under priorities 33 & 34		Text amended and definitions provided in the glossary
319	I think this is a great piece of work that reflects the habitats and species of Worcestershire and measures that will benefit biodiversity, people and the environment. I have commented and made suggestions below that I think will enhance the LNRS – firstly comments on the Potential Measures proposed, and secondly on the GIS mapping in relation to *redacted text* properties.		Comment noted and welcomed.
320	Biodiversity Priority 30/Potential Measures 32 and 33: There is a possible conflict with some of PM36 (i.e. no-till) as arable plants rely on tillage/soil disturbance to persist in arable landscapes.		Content to be added to PM32, 33 and 36 Storymaps
321	Potential Measure 12 (plant more woodlands) can I suggest a caveat ‘...following an ecological assessment to ensure that woodland is not established on existing good quality habitat’		Wording to be amended.
322	Potential Measure 25 – most of these seem to be about horticultural management rather than enhancing wildlife value, e.g. formative pruning, controlling pests, controlling grass and scrub at the base of trees. The latter two could be detrimental to biodiversity or contradict with ‘managing without the use of chemicals’ depending how it is interpreted. I would suggest items such as: manage by organic principals, low intensity management of grassland, incorporate other habitats such as scrub, hedgerows and ponds, retain some mistletoe.		Wording to be amended.
323	Potential Measure 26 – can we include retention of some mistletoe please for the specialist invertebrates associated with it. May also be worth referencing the conservation of local heritage varieties of fruit as these have some cultural and genetic significance.		Wording to be amended.
324	Potential Measure 27 – can this refer to the priority habitat description of ‘traditional orchards’ in some way to differentiate it from intensive commercial orchards? i.e. wider spaced trees on vigorous rootstocks, low intensity management, no pesticides etc. May also be worth referencing the conservation of local heritage varieties of fruit.		Wording to be amended.
325	Potential Measures 45 and 46 – could also reference use of timers or sensors to reduce light when it is not needed.		Wording to be amended.
326	Potential Measure 39 – can we add no pesticide use in public green spaces please? e.g. no routine use of herbicides around the edges of paths, play areas, fences, bases of trees etc.		Wording to be amended.

Comment ID	Comment	Considerations	Action
327	<p>Croome. APIBs are not showing the existing parkland priority habitat, or priority habitat grassland. Although parkland is shown under PM19 and 20 (enhance/create parkland). *redacted text* can send maps/our GIS data if you've not got this.</p> <p>The existing parkland is of international significance for the range of saproxylic invertebrates it supports (currently ranked 11th best site nationally on the Saproxylic Quality Index). Nearby is Bredon Hill (currently ranked 12th best site based on SQI, and within the top 10 on other scoring systems). Creating connectivity between the two sites for invertebrates that use veteran trees would benefit both of these sites by creating larger, more resilient populations of the key species. It seems this could be achieved by the following measures on land inbetween the two sites:</p> <p>PM22 Enhance Landscape Connectivity for Species Using Veteran and Ancient Trees; PM20 Create New Wood Pasture and Parkland Habitat; and perhaps PM23 Create and Enhance a Habitat Mosaic.</p>	<p>APIB layer maps statutory and non-statutory site designations and Irreplaceable Habitat. Worcs APIB layer at Croome Irreplaceable Habitat as a combination of Defra Priority Habitat Inventory wood pasture and parkland and Worcestershire Habitat Inventory 10 wood pasture and parkland. Non-designated grassland is not included as APIB as this habitat is not Irreplaceable Habitat under the legal definition.</p> <p>PM mapping in the landscape between Bredon Hill and Croome reviewed. Connectivity here for ancient/veteran tree, wood pasture and parkland habitat is bisected by mapping within the Avon floodplain indicating suitability and opportunities for PM8 (wetland) and PM63 (wetland and wader birds). Opportunities are also mapped across this landscape for woodland and orchards, and the wording of these Potential Measures supports the habitat requirements of saproxylic insects.</p>	None
328	<p>Clent Hills. It has recently come to our attention that there is a significant area of species-rich neutral grassland (MG5/MG5c) on land in-between Clent Hills and Penorchar Pastures SSSI. It currently has no protection or designation and I have brought it to the attention of Natural England to try and get it added to the Priority Habitat Inventory ASAP. I believe this should be mapped as an APIB (Fig.1 below) [map provided] both for its existing value and its ecological function of connecting Clent Hills with the SSSI.</p>	<p>It cannot be mapped as APIB unless it has a statutory or non-statutory site designation or comes under the legal definition of Irreplaceable Habitat.</p>	PM29 mapping extended in this location
329	<p>Kinver Edge / Landscapes Project. The *redacted text* land at Kinver Edge includes a Lowland Heathland SSSI in South Staffordshire extending to the Worcestershire border. This is a regionally important site for Adder and invertebrates. Our ownership extends into north Worcestershire covering Kingsford Forest Park and Blakeshall Common. This area comprises a small area of existing lowland heathland (also SSSI and isolated from the larger heath on the Staffordshire side), whilst the remainder is predominantly conifer plantation on former heathland.</p> <p>Can you please add our land shown in Fig.2 [provided] to PM30 Create or Enhance Species Rich Acid Grassland and Heathland, and PM50 Expand the Range of the Two Core Adder Populations. We can send GIS mapping if preferable. We currently have proposals to restore c.18ha of the conifer plantation to heathland which will connect the two area of heathland SSSI and provide habitat connectivity for adder and other rare heathland species.</p>		Location added to PM30 and PM50 targeting.



Comment ID	Comment	Considerations	Action
330	General comments on document. The document is set out well and easy to read. I have suggested a few minor amendments below:		
331	P11. It could be useful to have the species assemblage names rather than all species in them as some assemblages are less obvious without a title (e.g. the wet woodland assemblage which includes one sedge and 3 fungi).		Add titles to species assemblage boxes
332	P23. The example calcareous grassland plants could be refined to better reflect the habitat – e.g. Bird's-foot Trefoil is a good positive indicator but can grow in acid, neutral or calcareous conditions. Salad Burnet is a good one for calcareous grassland, and others could include Yellow-wort, Pyramidal Orchid and Marjoram.		Text amended
333	P23. The two butterflies mentioned under lowland heathland are species more typical of woodland – two better examples for heathlands would be Small Heath and Small Copper.		Text amended
334	P74. Thanks for referencing Sandscapes and 8 Hills.		You're welcome
335	<p>In the North Worcestershire / WMCA section, please update the size of the proposed regional park to c.50 square miles.</p> <p>Please could you add some text to explain how the regional park would help deliver the LNRS. We have suggested the following below:</p> <p>The regional park proposals include measures to mitigate the impact of the increasing population and demand for access to greenspace on country parks. By creating more and better connections to greenspace near where people live, visitor pressure will be spread out across the regional park area. Regional park planning policies could also offer a mechanism for levering impact mitigation funding from new developments that are likely to increase pressure on country parks</p> <p>The regional park planning policies will ensure high quality GI is included in new developments and that a consistent, long-term approach is put in place to managing new, publicly accessible greenspaces for nature and people. This will support the mitigation of the increasing demand for land for built development and infrastructure on natural habitats (identified on P41) and contribute to delivering nature-rich built environments (identified on p60).</p> <p>The regional park will play a convening role, making it easier for communities and landowners / land managers to access funding for delivering environmental benefits such as habitat creation and nature-based solutions for air quality and flood risk reduction.</p>		Text amended
336	P80. Formatting error– all of priority 20 is in bold.		Text amended
337	P97. PM54, leave stores = leaf stores?		Text amended

Comment ID	Comment	Considerations	Action
338	<p>Water and Wetlands theme</p> <p>Waterfowl shooting in Worcestershire is a significant driver for wetland conservation, especially within farmed landscapes. Shooting provides an important incentive for creating, retaining and managing wetland features to support breeding and wintering waterfowl. Therefore, it is going to assist with wetland creation and management, especially ponds, reedbeds and wet grassland.</p> <p><i>*redacted text*</i> provides advice to members on how to create and manage ponds and scrapes to be nature rich. In fact, we have members who have created ponds tailored to the needs of different species. For example, a pond attractive to teal is different from one for mallard. This diversity of wetlands means it provides a wider range of ecological niches for wider species and contributes towards a naturally functioning ecosystem at the farm and farm cluster scales.</p> <p>Our wildfowling and wetlands team can provide specialist habitat advice and have collaborated with the Wildfowl and Wetlands Trust and the Environment Agency on major wetland creation projects in the southeast of England that could be applied on shoots in Worcestershire.</p>		Comment noted



Comment ID	Comment	Considerations	Action
339	<p>Trees, Scrub and Woodland theme</p> <p>Sustainable shooting will assist the delivery of this priority because woodlands are key habitats managed by the shooting community. The long-term evidence base shows that land with pheasant shooting is likely to have a greater extent of better managed woodland and hedgerows than areas without it. Moreover, a recent study undertaken by the Oxford Systematic Review LLP further adds to the evidence base demonstrating the benefits of game shooting on woody habitats at the landscape scale. It assessed over 1,000 woodland sites managed for gamebirds with matched comparator sites by using different remote sensing technologies (OXREV 2024). The study shows that:</p> <ul style="list-style-type: none"> ❁ Woodlands on sites with game shoots are structurally more diverse than woodland on comparator sites. ❁ Shooting sites had over twice the length of hedgerows than comparator sites. <p>This demonstrates that shooting is a key partner for the LNRS, including for potential actions 16 and 17 on hedgerows specifically.</p> <p>In terms of practical advice, *redacted text* will assist the LNRS to deliver improvements in woodland management through our education and advice to shoots. This advice is aligned with Forest Research’s woodland ecological condition criteria which in turn underpin the UK Forestry Standard (UKFS). This advice is available as an advice pack to members on our website and our regional teams use it when on shoot visits.</p> <p>The role of shooting for deer management and grey squirrel control to improve the ecological health of woodlands and allow successful regeneration and woodland planting is essential. Therefore, we are pleased to see potential measure 15 cover this. Our Deer Team work with individual stalkers, groups like the Deer Initiative and the Forestry Commission to support sustainable deer management to minimise deer’s negative environmental impacts, whilst maintaining high standards and increasing the flow of UK venison to local people. The team, along with our Game and Wildlife Team provide advice on grey squirrel management. *redacted text* is part of the UK Squirrel Accord who are leading the way on finding appropriate solutions to the impacts of grey squirrel on woodlands and key wildlife like red squirrel.</p> <p>In terms of supporting landscape scale management it is worth looking at the Norfolk Deer Strategy. Launched by the Norfolk Farming and Wildlife Advisory Group is it a county-wide deer management strategy to improve collaboration between landowners, stalkers and venison suppliers. It’s core partners include the Broads Authority and society of deer stalkers working to best practice. You may be aware that *redacted text* has created a Register of competent deer stalkers to connect competent people with organisations like the Woodland Trust and other landowners who need deer management. If you would like to highlight this in the LNRS then we would be happy for you to do so.</p>		Comment noted, this is helpful to be aware of



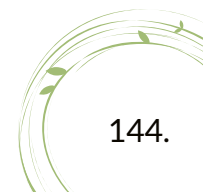
Comment ID	Comment	Considerations	Action
340	<p>Open Habitats theme</p> <p><i>*redacted text*</i> has a strong segment of affiliated clubs and syndicates who manage wetlands as part of their sustainable shooting management. As indicated above under the Water and Wetlands Theme this includes significant projects to create or improve the condition of wet grassland for breeding and wintering waterfowl. There will be opportunities to work with these groups to increase the extent and quality of these sorts of wetland habitats.</p> <p>The influence of shooting on farm landscapes to provide the incentive, means and manpower to create nature-friendly systems is substantial. Hedgerow management and provision of grass strips for breeding birds, in conjunction with brood rearing and winter game covers on arable land and humane pest and predator management support game and wider nature recovery objectives. Therefore, the LNRS teams should consider shooting as an enabler for enhanced delivery under this theme.</p>		Comment noted
341	<p>Habitat Connectivity theme</p> <p>Shooting, especially game shooting, links farmland habitats together. Woodlands are connected via hedgerows and new woodlands created. Field margin measures such as wide grass margins and cover crops link this landscape together insects and plants. There are many opportunities for shoots to assist with this theme, notably potential measure 23.</p>		Comment noted
342	<p>Earth heritage theme</p> <p>The actions in potential measure 36 are delivered by management of farms and estates for game shooting notably planting and restoring hedgerows, and creating in-field and field edge grass buffer strips. This is another example of where working with the shooting community will aid delivery of the LNRS when published.</p>		Comment noted
343	<p>Water vole as described in potential measure 49 is good as it supports mink control/eradication as a mapped action. <i>*redacted text*</i> has long supported water vole recovery projects across the UK by creating networks of volunteers to provide suitable habitat and mink control. We are part the Waterlife Recovery Trust whose approach and experience has provided unparalleled results. <i>*redacted text*</i> provides advice and training on the standards and skills required to undertake wildlife management humanely and to best practice standards. We train nature conservation staff, pest and predator controllers and members of the shooting community.</p>		Comment noted, this is helpful to be aware of

Comment ID	Comment	Considerations	Action
344	<p>Adder is covered by potential action 50. We support all its measures except: Manage predator threats (pheasants, dogs and cats) and recreational disturbance, including machinery and vehicles, where adders are present (with buffer).</p> <p>We have concerns about the reference to pheasants. We recognise that interaction between adders and pheasant is a developing area for study. It is certainly true that individual pheasants can predate individual adders but there is a lack of robust evidence on the impact of pheasant on adder at a population scale, as detailed in the Ecological consequences of gamebird releasing and management on lowland shoots in England which was commissioned jointly by <i>*redacted text*</i> and Natural England.</p> <p>Alongside this, our current advice on releasing already recommends avoiding releasing onto adder hibernacula. The advice is publicly available in the Code of Good Shooting Practice which says: Shoot managers must endeavour to deliver an overall measurable improvement to habitat and wildlife on their shoots and should avoid releasing birds into sensitive habitats or locations. This advice draws on GWCT’s sustainable gamebird release guidance which specially uses reptile hibernation sites as an example of a sensitive location. In addition, pheasants are actively managed by shoots to keep them in the desired areas by people working gundogs from outside of the shoot back to the centre. Therefore, with knowledge of adder habitats used pre and post hibernation, local shoots could keep pheasants away from them.</p> <p>What should not be overlooked is the benefit that management for pheasant brings for adder. Woodland management to increase open space, thinning, ride enhancement and developing scrubby edges, are actions done to support pheasant shooting that will benefit adder. In addition, game shooting provides management of carrion crow and red fox which predate adder. What is needed is a pragmatic and local approach to minimise potential risks yet retaining the positive habitat and species management actions that benefit adder. Considering this, we recommend that the action either:</p> <ul style="list-style-type: none"> ✿ removes the reference to pheasants or ✿ states that game bird release and management should adhere to existing best practice and provide a link to the Code of Good Shooting Practice. <p>If the LNRS partners have concerns on a site level basis then <i>*redacted text*</i> is keen to engage and provide support in any discussions.</p>		<p>Wording of PM50 amended</p> <p>Add links to Code of Good Shooting Practice and Ecological consequences of gamebird releasing and management on lowland shoots in England to PM50 Storymap</p>
345	<p>Dormouse is covered by potential action 51. We want to highlight that the management of woodland for shooting is beneficial to dormouse and is recognised in the dormouse conservation handbook. Around 2010 <i>*redacted text*</i> delivered a project in Cheshire linking together 32km of woodland and hedgerows to ensure dormouse in the county could spread in response to climate change. It was the shoots that provided the initial stepping stones from which we secured the support of the other landowners and farmers to create the network. It is useful to consider shoots in this way, as possible stepping stones for wildlife corridors.</p>		<p>Comment noted, this is helpful to be aware of and is something that the LNRS can learn from and potentially seek to replicate as we enter delivery phase.</p>



Comment ID	Comment	Considerations	Action
346	<p>Curlew, lapwing and redshank are covered by potential measure 63 for wetland and wader birds. We commend you for including legal control/reduction of predator disturbance. Often other LNRS have not addressed predation. Lowland ground nesting breeding wading birds have the same three main pressures, lack of suitable habitat, lack of appropriate management of that habitat and losses of eggs and chicks to predators. This potential action could be clearer that the control/reduction is to avoid not just disturbance but direct losses of eggs and chicks. Therefore, you could amend the wording to read:</p> <ul style="list-style-type: none"> ✿ Legal control/reduction of predators to reduces losses of eggs and chicks and to reduce disturbance where possible and appropriate 		Wording of PM63 amended
347	<p>Grey partridge is covered by potential measure 65 as part of the farmland bird suite. The sustainable shooting of grey partridge is an enormous driver for the conservation actions they require both in terms of habitat creation and species management for farmland birds. Shooting sports are an obvious partner for delivery for grey partridge.</p>		Comment noted
348	<p>We are very pleased to support the general tone and thrust of this important document and have welcomed the chance to be closely involved in its development. We applaud the team at the County Council, Natural England and the supporting authorities for successfully bringing the LNRS to this stage and look forward to publication of the final Strategy in due course. We are hopeful that that will represent a turning point in nature's recovery in Worcestershire and we anticipate that it will lead to a ramping-up of practical action for wildlife that is long overdue.</p> <p>We fully endorse the underpinning evidence base used to determine priorities set out in the document. It is clear that considerable effort has been put into matching the requirements of the legislative and policy backdrop to LNRS with a measured and sensible drive for nature's recovery, at scale, in Worcestershire.</p>		Support noted and welcomed.
349	<p>Noting the requirements set out in the LNRS guidance, we appreciate that much of the document is largely focussed on short-term, deliverable and mappable outcomes. This makes sense in the context of the guidance but we worry that longer-term outcomes and a coherent direction for nature's recovery over decades, rather than years, is given only very limited consideration in the document. While this is understandable, we strongly recommend that the partners involved in the LNRS process make clear to Government that development of an overarching long term, coherent vision for nature, underpinned by evidence and action in the LNRS, should be a priority in its own right. Generating long term secure funding and practical resources for nature's recovery needs detailed consideration so that the excellent priorities set out in the LNRS (and in future iterations) do not operate in short cycles attached to temporary funding streams, or even worse in complete temporal isolation, but that they hang together to form a genuinely coherent basis for reversing declines and building a more resilient natural world.</p>	<p>Noted, however this work is beyond the scope and specifications for LNRS development as set out by DEFRA's guidance.</p>	None

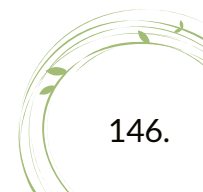
Comment ID	Comment	Considerations	Action
350	<p>Securing funding and mechanisms for capturing and maintaining data on practical action and species and habitat information will be essential over the long term and this needs further consideration as part of the LNRS process. It is therefore somewhat worrying that the detail around future funding for the process, and for delivery of the Strategy, remains uncertain. Clarity around, and clear prioritisation of, funding directed towards the practical delivery of measures in the LNRS will be essential if the Strategy is to be enacted as intended. Any lack of follow-through in this regard will leave the document stranded as another example of many good words on a page but scant action in practice. This would not just be unfortunate but would be unforgivable in the face of known declines and the persistent lack of action to deliver on promises around nature's recovery from recent Governments. Sufficient resourcing of monitoring and data collection / storage will be critical in tracking success and needs to be embedded in a long-term approach to delivery of LNRS priorities.</p>	<p>Noted and agreed. Further DEFRA guidance on LNRS monitoring requirements and reporting protocols is in development.</p>	<p>None</p>
351	<p>It would be helpful to ensure that existing, well established and effective mechanisms for delivery are given a higher profile for their role in delivering Potential Measures (PMs). We are pleased to see Severn Treescapes mentioned but would welcome some stronger wording around support for this important tool for delivering against woodland, orchard, parkland and hedgerow PMs. In addition, it would be very helpful to make reference to Natural Networks as a key delivery tool for smaller open spaces, especially in urban areas (including villages). These two projects have excellent track records for delivery against LNRS priorities and could be useful mechanisms for continued effective action under many of the PMs. Making this clear, alongside other similar projects, in the LNRS commentary could be a useful way to improve their profile and generate more opportunities for delivering nature's recovery in the county.</p>	<p>Agreed. We propose including signposting to both Natural Networks and Severn Treescapes/Dead Wood Society projects in relevant PM StoryMaps and would welcome any best practice case studies which could be shared through these platforms.</p>	<p>Include further information on Natural Networks/Severn Treescapes in StoryMaps for relevant PMs. Request additional case studies from Natural Networks team if possible.</p>
352	<p>We welcome the inclusion of so-called supporting activities, which we consider will be important in delivering the ambitions of the Strategy. We would recommend that the need for an up to date evidence base is set out somewhere in that section, making the point that resourcing the underpinning elements of the LNRS – mapping, data management, partnership working, secretariat etc. - will be essential in delivering results under the PMs. In relation to this it may be helpful to add a broader commentary on monitoring and recording of success across the suite of PMs.</p>	<p>Noted and agreed.</p>	<p>Text to be added to acknowledge the importance of Worcestershire's wider environmental partnership in delivering Supporting Activities, through means including (but not exclusively) collecting and sharing of ecological information, and ensuring functions and roles supporting LNRS delivery are appropriately resourced.</p>
353	<p>Similarly, we endorse the way the LNRS captures the wider environmental benefits underpinned by nature's recovery. Delivery of these important environmental co-benefits through nature's restoration has long been understood but all too frequently underplayed and so we welcome the commentary presented on this in the LNRS. It also seems sensible to us to use the co-benefits as one way to order multiple potential PMs on any given parcel of land and so we support this approach and its impact on the drop-down menus on the draft Local Habitat Map.</p>	<p>Noted. Support is welcomed</p>	<p>None</p>



Comment ID	Comment	Considerations	Action
354	<p>Noting the commentary on monitoring of delivery of the LNRS set out in the document it may be helpful to make specific mention of partner organisations, whose data sets and direct survey effort may be especially valuable. While this information will usually make its way to the WBRC in a reasonably timely manner there will be occasions where partners have useful information (at the point of an LNRS refresh) that has not yet been passed along. Capturing this will be essential in demonstrating the effectiveness of measures set out in the LNRS and so is perhaps worthy of further commentary now.</p>	<p>Detailed advice on the recording and reporting of LNRS PM delivery would be presumptive in lieu of DEFRA's forthcoming guidance, however we agree promoting data sharing between LNRS stakeholders and Worcestershire's environmental partnership members would be beneficial.</p>	<p>Text to be added to p77 ('Enable measuring and monitoring of outcomes') and to the final paragraph of p110 (5.2 Monitoring delivery of LNRS').</p>
355	<p>A final general point is in relation to the length and complexity of the document suite associated with the LNRS. We suspect that some users will find the detailed documents in the evidence base and the draft strategy itself to be complex and rather long. In our view, the level of detail set out in the documents is a necessary evil and we congratulate the team for presenting an extremely complex process in plain language and as simply as possible. The 'story maps' are especially helpful in offering easy-to-digest information and signposting to more detail for those less familiar with the topics than specialist bodies like *redacted text* and other partners. In connection with this, we believe that the approach used in the web-based portal for accessing the draft Local Habitat Map is an important and very welcome element of the consultation, which should make entry into the LNRS considerably more straightforward than it would otherwise have been. Continued resourcing and development of the web portal will therefore be a critical element of the LNRS process in future and needs to be assured if the LNRS is to be an effective tool to drive nature's recovery in Worcestershire.</p>	<p>Noted. Support is welcomed</p>	<p>None</p>
356	<p>1. If the right priority habitats, species and environmental issues have been identified for Worcestershire</p> <p>We have been closely involved in developing the priority habitats, species and environmental issues listed as priorities for Worcestershire in the LNRS. In our view, and as an umbrella answer to this general question, yes, the identified priority habitats, species and environmental issues make sense in terms of matching our knowledge of the county and the statutory guidance on developing LNRS.</p> <p>However, while we understand the restrictions placed on development of the LNRS it is important to note that there are other key species found in Worcestershire that do not make it onto the single species PM list that are nonetheless very important in the local context. Of particular note are stag beetle; for which habitat-based approaches under trees, scrub and woodland may not be appropriate in the areas in which the species is found; and grizzled skipper, a species of short turf and bare ground (in some cases a brownfield species) with specific requirements that are perhaps not well captured under habitat PMs at present. In the latter case we are content that amendments to the woodland and grassland PMs could offer the best solution but we make further representations in relation to a stand-alone PM for stag beetle below. In addition, we note that while urban habitats, including gardens, disused railways lines etc., are mentioned on page 25, they are not included as one of the Biodiversity Priority themes. Although they obviously contain habitats covered in other PMs it is nonetheless worth noting that disused railway lines in particular are important ecological corridors in parts of Worcestershire and may be worthy of specific mention in some of those PMs, or more generally in the contextual information for the county.</p>		<p>Stag Beetle has been added to the list of LNRS species priorities.</p> <p>Wording of Biodiversity Priority 34, and the title and wording of Potential Measure 47 have been amended.</p>



Comment ID	Comment	Considerations	Action
357	<p>2. If the right 'Potential Measures' (suggested on-the-ground actions for recovering nature) have been mapped in the right locations.</p> <p>We are pleased to support the Potential Measures set out in the LNRS consultation document and we are content that where implemented they will drive appropriate actions across the county. In our view they have been mapped in appropriate locations in line with the statutory guidance on LNRS preparation, although we would generally recommend that the area covered by many mapped measures be expanded (and we make explicit reference to this in places below). That said, we recognise the balance to be struck between wide-scale mapping and the prioritisation required by the statutory guidance on LNRS development and the following comments should be read in that light and not as criticism of the work completed thus far. Please take our silence on some measures as our support for their inclusion as they are. Overall we welcome and support the level of ambition in the draft LNRS and recommend only very modest changes in some places:</p>	<p>Comment noted and support welcomed. LNRS mapping is constrained by advice from Defra/NE with regards to the extent of individual PM mapping and the total county 'coverage' which is deemed acceptable. Mapped PMs are required to be as targeted as possible.</p>	None
358	<p>PM01: De-culvert and re-naturalise watercourses: This measure appears to have been mapped in just 5 spots in or around Bromsgrove. Noting that this will be in line with ongoing action by partners it is nonetheless important to consider that action could be taken in many other locations across the county. For example, the 'Unlocking the Severn' project sites at Diglis Weir and elsewhere seem to have been mapped under PM62. Perhaps these PMs could now be amalgamated under one PM, or potentially both shown on the same layer when one or the other is toggled on, just for the additional clarity this could bring to the map.</p>	<p>This PM has now been re-titled and re-worded to alter its scope.</p>	None
359	<p>PM04: Protect and Improve Water Resources (non-mapped): We are pleased to support this potential measure, but perhaps it does not go quite far enough. Please see part 4 below for more comments on proposed changes to wording.</p> <p>We recommend that this measure should go further and consider the range of urban measures individuals could take, such as rainwater harvesting and avoiding misdirecting water from appliances, in the introductory section. Noting that road run-off pollutants account for around 18% of water pollution it would also be helpful to make explicit reference to this in the commentary associated with this PM. Increased roadside SUDS to treat this run-off would help to protect and improve water resources as well as bringing obvious other benefits.</p> <p>It may be helpful to signpost to SUDS guidance from CIWEM [link provided] in this PM.</p>		<p>Wording of PM amended Add SuDs guidance to PM4 Storymap</p>



Comment ID	Comment	Considerations	Action
360	<p>PM34: Reduce fragmentation and increase the functional connectivity between core sites within the Worcestershire Nature Recovery Network: This is a really important element of landscape-scale action for nature's recovery. However, many interventions will necessarily be modest in scale and diffuse in distribution. The Natural Networks Partnership (between Worcestershire Wildlife Trust and Worcestershire County Council) has already drawn down over £900,000 for ecological enhancement of public open spaces in rural and urban areas in Worcestershire. More than 270 projects have been completed and advice given to landowners on more than 3000ha of land. With more than 31,000 trees and shrubs planted, 67 ponds enhanced, restored or created and 75ha of wildflower meadow enhanced or created, this represents a clear contribution to this PM. We have supplied the relevant site boundaries to the LNRS team and hope that these sites may be mapped accordingly, either at this stage or in later iterations of the Strategy when sites have had more time to mature.</p>		<p>Natural Networks projects have been incorporated into the mapped Potential Measures within the Local Habitat Map.</p>
361	<p>PM38: Increase the extent, connectedness and quality of wildlife habitats within the built environment: We are pleased to support the mapping for this measure. We recommend some minor changes to the wording below.</p> <p>While we are pleased to support the current wording for this measure, it would be helpful to also make explicit mention of blue corridors as well as green corridors in the introductory paragraph. Many urban areas in Worcestershire will have a river, brook or canal running through them, making an important linear wildlife corridor. In places where the waterway includes a tow path or public right of way, they also provide cycle- and walkways for the benefit of local communities. In addition, and noting PM46, we still would recommend more explicit commentary on the impact of lighting on urban and urban-fringe wildlife here as well. This may have a significant effect on populations and mobility of a range of species and cross referencing here would therefore be helpful.</p>		<p>Wording of PM amended</p>
362	<p>PM39: Enhance existing community green spaces for wildlife: We note and welcome the inclusion of many areas under this mapped measure but it may be that others could also be included in future. Please see our comments under PM34 for more on this. Many principally green spaces in urban areas are also 'blue-green' spaces that have value for attenuation of runoff and or for improvements in water quality. Mapping of additional areas would highlight the importance of water as a valuable resource on many different levels and could be usefully considered here.</p> <p>We welcome and endorse the wording of this measure but consider that it would be helpful to also reference the importance of sustainable water use in community gardens or for growing food in community spaces in the introductory paragraph. Rainwater harvesting may be especially valuable in this context and so would be worth promoting here. In addition, it may be worth noting that not all sites will necessarily need enhancing, possibly just targeted/informed site management. A few could be significant brownfield sites, providing perfect habitat for rare plant and invertebrate species already. Noting that this is a mapped measure, it would be helpful to consider making explicit reference to Natural Networks projects, which have delivered ecological enhancements to many locations across the county that would be in line with this measure. We have forwarded the site boundaries for those locations already and provide more commentary on the programme under our previous comments on PM34.</p>		<p>Natural Networks projects have been incorporated into the mapped Potential Measures within the Local Habitat Map.</p>
363	<p>PM56: Habitat creation and enhancement for Brown Hairstreak: There is a slight error related to the map drop down for PM56. The description in the caption refers to biosecurity for crayfish rather than expanding on the needs of brown hairstreak.</p>		<p>Corrected</p>



Comment ID	Comment	Considerations	Action
364	PM59: Increase nesting habitat and food sources for Swift and House Martin: As part of increasing food sources for swifts and house martins in the urban areas mapped it may be helpful to provide a cross reference to other habitat PMs. For example, improvements in water quality and the creation of more wetland habitat in urban areas (and beyond) to support larger insect populations could help to provide food for these species.		Wording of PM amended
365	PM62: Remove barriers to migratory fish passage: We note that there are only a handful of mapped sites for this PM at present. We understand the logic for this but please see our comments under PM01 for further discussion. This is a good example of where the relative short-term approach driven by the LNRS guidance is unhelpful. There are many other places where works need to be completed but for which funding and relevant permissions have not yet been secured. It would be extremely helpful to be able to map these potential locations more closely so as to demonstrate what could be possible with the combined efforts of landowners and partners in terms of unlocking other watercourses across Worcestershire.	Mapping of PM62 has been discussed and agreed with the Environment Agency as locations that can be prioritised for action. Agree that a longer-term view re additional barriers would be helpful.	Discuss with EA providing additional mapping resource within PM62 Storymap that would draw attention to other barriers or priority watercourses/catchments.
366	PM10: Restore PAWS woodlands: It may be worth expanding the introductory text to this PM and making specific reference to creating diversity in age, as well as structural and species diversity. As yet there is no mention of the importance of ride networks to aid with future management or of coppicing, ride-edge management, open space within woodlands or creation of habitat mosaics (bracken/grassland/scrub), which may be especially important in this context. It may be helpful to signpost to Forest Research guidance on this at [link provided].		Wording of PM amended. Add Forest Research link to PM10 Storymap.
367	PM11: Enhance condition of ancient semi-natural woodland: It may be helpful to make specific reference to the importance of developing variation in age structure and the value of creating/retaining areas of bare ground in the introductory paragraphs here. Again, guidance from Forest Research may be helpful.		Wording of PM amended
368	PM13: Enhance condition of existing woodlands for wildlife: It would be extremely helpful to add some commentary on the need to maintain and / or create bare ground in the introductory paragraphs here. This is an essential habitat component for both Dingy Skipper and Grizzled Skipper and bare ground creation can help manage dominant, problematic ride-edge species too. Rotational ride-edge management is key to ensuring that wood white continue to thrive in woods where they are present and removal of arisings is therefore also important. Noting PM66, Pearl-bordered fritillary (PBF) and small pearl-bordered fritillary (SPBF) could still be added to the list of special species noted already under PM13. They are both found in Wyre Forest and are important county species. If PBF & SPBF are added, appropriate management of bracken/scrub/grassland mosaic habitat is key, as well as ride-edge management and coppicing. It may be useful to signpost to helpful information on grizzled skipper [link provided] which may be usefully appended to all woodland mapped measures. Similarly there is useful information on bare ground management for butterflies at [link provided]		Wording of PM amended

Comment ID	Comment	Considerations	Action
369	PM14: Increase tree cover in the farmed landscape: It would be worth making explicit reference to the Worcestershire Woodland Guidelines under this PM. Guiding the right tree to the right place is essential so as to avoid the unintended consequences associated with planting of the wrong species or wrong type of tree cover in the wrong location. Noting that this is a non-mapped measure, a map of Severn Treescapes coverage may be helpful for those looking for advice and could be helpfully added to the advice section of the PM.		Wording of PM amended Add Severn Treescapes and Worcestershire Woodland Guidelines links to PM12 Storymap
370	PM16: Create new hedgerows: It would be helpful to make mention of hedgerow margins alongside banks and ditches in the introductory paragraph. These are important components of hedges as linear corridors for wildlife and the LNRS could usefully promote their inclusion and management under this PM. Noting that this is a non-mapped measure, a map of Severn Treescapes coverage may be helpful for those looking for advice and could be helpfully added to the advice section of the PM. In addition, the hedgeline guidance could be usefully signposted from this PM [link provided].		Wording of PM amended Add Severn Treescapes and Hedgeline guidance links to PM16 Storymap
371	PM17: Enhance condition of hedgerows: While noting that brown hairstreak has its own PM it may still be worth making explicit reference to the importance of blackthorn hedges in the context of that species. It might also be useful to signpost to the Butterfly Conservation guidance in their hedgerows for hairstreaks leaflet [link provided]. In addition, the hedgeline guidance could be usefully signposted from this PM [link provided].		Wording of PM amended Add Butterfly Conservation Brown Hairstreak management guidance to PM17 Storymap
372	PM25: Enhance wildlife value of new and younger orchards: It would perhaps be worth adding some words on the benefits of adding habitat piles/hibernaculum (using local material) to enhance biodiversity in new and younger orchards. This augmentation of early plantings seems to bear considerable benefits and can act as a bridge to more mature habitats for some important species. As such it would be helpful to add something to the introductory paragraphs on this.		Wording of PM amended
373	PM29: Create or enhance species-rich neutral grassland, PM30: Create or enhance species-rich acid grassland and lowland heathland & PM31: Create or enhance species-rich calcareous grassland: We are pleased to support the wording on taking a mosaic approach to incorporate scrub, orchard and ponds where appropriate in these PMs. With this in mind, and noting that such things are covered in other PMs, it would be helpful to also add some wording on the value and importance of field-margins (both in terms of hedgerows and tussocky ecotones) in the introductory paragraphs of these PMs. Such features are equally important components of the various grassland types and making explicit reference to them here would be helpful.		Wording of PM29, 30 and 31 amended
374	PM50: Expand the range of the two core Adder populations: Noting that this is a mapped measure it would be helpful to add some wording on the need for regular monitoring of the populations to inform management in the list of actions.		Wording of PM amended



Comment ID	Comment	Considerations	Action
375	PM51: Habitat creation and enhancement for Dormouse: Noting that this is a mapped measure it would be helpful to add some wording on the need for regular monitoring of dormouse populations to better inform the management approaches set out in the list of actions. We have a slight concern about the wording in the bullet point 'do not clear understory in winter'. While noting the obvious justification behind the existing wording, coppicing is an essential part of managing sites for dormice and would often take place in the winter months. Accordingly, it might be helpful to amend this wording to something like 'avoid clear felling in dormouse locations and undertake coppicing on rotation, retaining unbroken links for dormice and taking particular care not to remove stools that may be used for hibernation.'		Wording of PM amended
376	PM52: Carry out Dormouse reintroductions: It would be helpful to add some overarching commentary to the introductory paragraph to this PM covering the need to ensure an ongoing commitment to manage habitat and monitor any reintroduced population for an appropriate period of time.		Wording of PM amended
377	PM56: Habitat creation and enhancement for Brown Hairstreak: It may be helpful to add some wording on the need to continue to monitor the population to the list of actions under this PM. Winter egg counts are the most reliable method and should be encouraged but timed counts specifically looking for the adults would also have value. It might also be useful to signpost to the Butterfly Conservation guidance in their hedgerows for hairstreaks leaflet [link provided].		Wording of PM amended Add Butterfly Conservation Brown Hairstreak management guidance to PM17 Storymap
378	PM66: Recovery of Fritillary butterfly populations: It would be helpful to add marsh violets as well as dog violets to the species list in the open habitat measures section of this PM as small pearl bordered fritillaries use both as larval food-plants. Similarly, a specific comment on the need to ensure connectivity between occupied and unoccupied, but suitable, sites is also key to population maintenance and recovery. In connection with reintroductions it would be helpful to add some wording on the need to secure an ongoing commitment by the landowner/land manager to manage suitable sites following a reintroduction. In addition, some specific wording in the woodland management actions on habitat monitoring to assess the impact of current site management and to ascertain if abundance of marsh violets and/or dog violets is appropriate for the population would be helpful. It may be that violets also need to be introduced (or an extant population augmented) in order for reintroductions to be effective in the long term. We understand that Butterfly Conservation have a standard habitat assessment for pearl-bordered and small pearl-bordered fritillary that may be useful in this regard. Finally, it will be essential to resource monitoring of the populations in the Wyre Forest and the recently reintroduced pearl-bordered population on the Malvern Hills.		Wording of PM amended
379	PM67: Reintroduction of Kentish Glory moth to Wyre Forest: Noting that this may be an important measure in its own right it will nonetheless be important to make sure that any habitat management work needed prior to a Kentish Glory reintroduction is compatible with the many other species using the mapped area. While this is clearly understood by the partners involved in the project it may still be helpful to articulate this in the PM for clarity and the benefit of other readers.		Wording of PM amended

Comment ID	Comment	Considerations	Action
380	Proposed new PM: Habitat management for stag beetles: This could be mapped to the town of Upton-upon-Severn and should include guidance on retaining and creating new deadwood resources suitable for the species. Noting the national guidance on species that should have specific PMs we understand why this beetle has not been included to date but we would reiterate that Worcestershire does sit on the north-western edge of their range and that the population in Upton is both significant and long-established. If it proves impossible to add the species in its own right it would be extremely helpful to include additional information on log piles for stag beetles in PM38: Wildlife habitats within the built environment.		Stag Beetle has been added to the list of LNRS species priorities.
381	<p>3. How easy the Local Habitat Map is to use and understand</p> <p>We have found the Local Habitat map easy and intuitive to use, though this is perhaps because we are familiar with the basic architecture and layout of similar mapping tools on the County Council's website and elsewhere. The guidance given is helpful and ought to make navigation and understanding of the map and associated dropdown menus as easy as it can be. Some of our officers have found the grid square solution to mapping of PMs very straightforward whereas others have found it difficult to always assign the right square to the site of interest. This has only been a very minor problem and overall we are content that the chosen approach is the best one for its purpose. The drop down menu for PMs is easy to use and makes good sense to us, as does using the environmental co-benefits to prioritise the lists. The lists offer an easy window into which actions should be taken where. In places the list is quite long but we consider this to be a benefit rather than a problem. Maximising options for potential action should offer opportunities that are attractive to the widest range of people, which seems like a positive step in delivering more nature restoration activity over a broader area.</p>	Comments noted and welcomed	None
382	Biodiversity Priority 34: Reduce fragmentation and increase the functional connectivity between core sites within the Worcestershire Nature Recovery Network: This is a really important element of landscape-scale action for nature's recovery. However, many interventions will necessarily be modest in scale and diffuse in distribution. The Natural Networks Partnership (between Worcestershire Wildlife Trust and Worcestershire County Council) has already drawn down over £900,000 for ecological enhancement of public open spaces in rural and urban areas in Worcestershire. More than 270 projects have been completed and advice given to landowners on more than 3000ha of land. With more than 31,000 trees and shrubs planted, 67 ponds enhanced, restored or created and 75ha of wildflower meadow enhanced or created, this represents a clear contribution to this PM. We have supplied the relevant site boundaries to the LNRS team and hope that these sites may be mapped accordingly, either at this stage or in later iterations of the Strategy when sites have had more time to mature.		Natural Networks projects have been incorporated into the mapped Potential Measures within the Local Habitat Map.
383	We support the priorities and measures regarding swift bricks (Potential Measures 38 and 59), but please add requirements for minimum numbers as per National Planning Policy Guidance (NPPG) Natural Environment 2025 paragraph 017, i.e. at least one swift brick per dwelling on average for new developments.	PM38 Storymap includes the recommendation of one swift brick or soffit box per building for household or minor or major development.	Wording of PM59 amended

Comment ID	Comment	Considerations	Action
384	<p>As for the “exemplar” published Isle of Wight LNRS (2025) UGG1.6 (part 2, page 90), please add the following artificial nest cups requirement:</p> <p>“Artificial nest cups for House Martins should be similarly considered as an alternative option where recommended by an ecologist. Existing nest and roost sites for building-dependent and building-reliant species such as Swifts, House Martins, House Sparrows, Starlings and bats must be protected and wherever possible augmented and enhanced by designed and built additional provision within ecologically relevant distances.”</p>		Wording of PM59 amended
385	<p>Potential measure 38 mentions “bat bricks”. Although “swift bricks” is the standard term for integrated swift boxes used in national policy, the term “bat bricks” is confusing because this also refers to bat access bricks, used for existing colonies in existing buildings. Also many integrated bat boxes are unlike bricks, e.g. bat tubes. Therefore, “integrated bat boxes” would be a clearer term.</p>		Wording of PM38 amended
386	<p>*redacted text* represents over 42,000 farming and growing businesses across England and Wales. *redacted text* has collaborated with Responsible Authorities (RAs) across the country developing the Local Nature Recovery Strategies (LNRS), being in the unique position of communicating with all RAs to help encourage a consistent message for what the LNRS should look like, ensuring involvement from farmers and landowners.</p> <p>*redacted text* representatives have been part of discussions with Worcestershire County Council on developing the Worcestershire LNRS and have fed in throughout the process. *redacted text* consultation response is an overview of our key considerations for the LNRS. We have encouraged our members to have their say on more specific aspects of the LNRS.</p> <p>Throughout the county of Worcestershire there are 1700 farmers and growers.</p>	Comments noted	None



Comment ID	Comment	Considerations	Action
387	<p>A LNRS could influence a farm planning application and access to environmental funding. Due to this and the vital role that farmers play in delivering for nature, *redacted text* has highlighted the need for all RAs to ensure that farming representatives, farmers, and landowners have had the opportunity to engage in the development of these strategies to ensure they work for farm businesses including their own ambitions for nature.</p> <p>Our ask from RAs has been that farmers and landowners are given adequate time and opportunity to engage with the strategy at various levels and stages throughout its development. It is up to the individual farmer or landowner how or if they engage. *redacted text* has worked with the Worcestershire County Council to give farmers the opportunity to feed into the process and promoted the public consultation.</p> <p>To help ensure the strategy accurately represents what is happening on the ground and what could be achieved alongside farm businesses and food production. We strongly urge that further consultation with farmers and landowners takes place before the final publication of the strategy and map and that ongoing engagement continues throughout the delivery phase of the LNRS.</p> <p>The timing of the public consultation fell over harvest, a busy period for farmers and growers which may have resulted in less engagement and understanding.</p>	<p>Worcestershire's LNRS Responsible Authority is pleased to have worked with *redacted text* throughout the LNRS's development. *redacted text* representatives were invited to join the project's Steering Group and expert Task and Finish Groups. We are grateful to the *redacted text* for circulating advice and updates to their members, contributing to engagement events such as 2024's Nature Friendly Farming Conference, and helping to promote 2024's LNRS 'Issues and Options' Consultation to its members. The Draft LNRS Consultation offered further opportunities for farmers and landowners to contribute to the Final LNRS. We anticipate further guidance and advice from DEFRA on how Responsible Authorities can best engage with all stakeholders through LNRS delivery phase and look forward to continuing to work with *redacted text* and its members in helping deliver natures recovery.</p>	None
388	<p>It is vital that the Worcestershire County Council and LNRS recognise agriculture as a keystone activity in the countryside. Farms produce food, fibre and energy whilst also caring for the environment, these businesses will be at the forefront of delivering the strategies. The LNRS should therefore not prevent or add cost to farms trying to diversify, modernise and develop infrastructure, create unintended consequences on farm operations or act as a barrier to funding (private and public). It should be a tool to help inform local land management decisions about nature. *redacted text* has identified the following key considerations for Responsible Authorities developing the LNRS:</p>	Comments noted.	None

Comment ID	Comment	Considerations	Action
389	<p>1. Thorough farmer engagement and consultation. The Responsible Authority must engage and consult farmers thoroughly. It is important this is from the early stages to ensure that the strategy reflects what is happening on the ground and what farm businesses wants to achieve. Defra has created Responsible Authority guidance on engaging with landowners and farmers with input from *redacted text*. It provides useful information on how best to engage with the agricultural sector including when, how and the key messaging to use. It is important that the Responsible Authority is transparent with farmers about the links with planning and funding which could impact their business. Responsible Authorities must recognise the value of farmers time in engaging with the LNRS development.</p>	<p>The preparation and consultation on Worcestershire's LNRS has been undertaken in compliance with DEFRA's statutory and non-statutory guidance and with input from DEFRA officers and support by the Steering Group and expert Task and Finish Groups including *redacted text* representation. Guidance and advice for all stakeholders on the use of Worcestershire's LNRS has been published including detailed advice on the role LNRS plays in the planning processes and additional and bespoke advice for farmers and landowners. Additionally, LNRS briefings with farmers and landowners have been provided via face-to-face events.</p>	None
390	<p>2. Recognition of farm contributions to nature. The LNRS must recognise the environmental contributions and improvements that farmers have already made, as well as any planned future contributions e.g. Environmental Land Management (ELMs), off-site Biodiversity Net Gain (BNG) etc. Farms will have their own priorities for nature, with consent this should be recognised in the LNRS.</p>	<p>The important role in natures recovery played by farmers and landowners is recognised within the strategy.</p>	None
391	<p>3. Use sound scientific data. Data used to inform the LNRS must be from sound scientific sources. If the LNRS incorporate interactive maps that allow users to pinpoint areas for nature recovery, it is essential that these contributions are validated by individuals with the requisite expertise to ensure they accurately represent the on-the-ground conditions and that permission for inclusion has been granted by the landowner or farmer. Data about agri-environment schemes such as Countryside Stewardship is available on Magic Maps and could be included in the LNRS, provided it is agreed upon by the landowner or farmer. Additionally, farm level data should be considered where relevant.</p>	<p>Up to date and robust scientific datasets underpin the Local Habitat Map, including Environmental Stewardship datasets provided by DEFRA. Through the Draft LNRS's consultation we've welcomed contributions refining these datasets based on landowners intimate knowledge of their land and the opportunities for nature's restoration it can offer. In compliance with the requirements of DEFRA's statutory LNRS guidance, the mapping of Potential Measures does not require landowners' permission, however both prior-to and during the Draft LNRS's consultation, we have carefully considered and actioned landowners' requests for the removal of mapped Potential Measures from their landholdings.</p>	None

Comment ID	Comment	Considerations	Action
392	<p>4. Appropriate mapping. Depending on the area, certain parts of the farmed landscaped would be more appropriate to include and prioritise/map in the strategies compared with others, hedges may be an example of this. Identifying Best and Most Versatile (BMV) agricultural land for nature and potentially land use change could have unintended consequences and many not be in line with the farmers own ambitions for that land. It is also important to acknowledge that land not classified as BMV can also be used for food production, and as such, the incorporation of environmental measures on these areas must also be carefully considered and align with the farmer or landowners' objectives.</p> <p>Should at any time the LNRS be used as a targeting tool for funding or the delivery of environmental outcomes, we do not feel the mapping in its current form has sufficient granularity. Without greater granularity and precision, there is a risk that funding and actions may be misdirected or unfairly applied. Any future shift in how the LNRS is applied must be subject to further consultation and improvement in the mapping quality.</p>	<p>The process of mapping Potential Measures in Worcestershire's LNRS is in compliance with DEFRA's statutory and non-statutory guidance. We agree that greater resolution of mapping would benefit mapping and prioritising of actions for nature's recovery and welcome the contributions made by landowners throughout the Draft LNRS's public consultation to aid in this mapping and prioritisation process. We note that the mapping of Potential Measures does not compel or constrain landowner's land-use and agree that classifications such as BMV agricultural land can be a barrier to the delivery of some nature recovery actions. Based on this Grade 1 BMV has been removed from mapping of Potential Measures in Worcestershire. We note *redacted text* wish further public consultation and review of mapping to be undertaken should there be a change in the function or application of LNRS in the future, however this would be a matter considered by DEFRA.</p>	None
393	<p>5. Access to funding. Many farms will already be involved or will be planning to enter into ELMs or private markets agreements. The LNRS should help enable farmers to access funding for nature alongside productive agriculture, the priorities in the strategy should account for this. The LNRS should not be the only mechanism for targeting funding under ELMs. ELMs must remain an equitable and accessible scheme for all farmers. Relying solely on LNRS could exclude farmers in areas not covered by these strategies, limiting their ability to access support for sustainable practices. ELMs should offer flexibility, ensuring all farmers, regardless of location, can benefit from funding to support environmental improvements.</p>	<p>The LNRS helps prioritise funding opportunities to those areas and actions which would most benefit nature's recovery. The design and implementation of ELMS is a matter for DEFRA to consider.</p>	None



Comment ID	Comment	Considerations	Action
394	<p>6. Consider impact on farm developments. Farms need to diversify, modernise, and develop farm infrastructure to remain economically and environmentally sustainable businesses. The LNRS and associated local plans have potential to impact on a farm planning decision and how many BNG units a farm development might need to create. This could prevent or add costs to these developments. The LNRS mapping should where possible exclude planned developments.</p>	<p>LNRS will help facilitate development by increasing the value of BNG units (where BNG delivery contributes towards the LNRS objectives) and therefore will reduce the cost of meeting the statutory Biodiversity Net Gain requirement for almost all new developments. Worcestershire's LNRS Local Habitat Map has been prepared in collaboration with Worcestershire's planning authorities, the public consultation on the Local Habitat Map has provided opportunity for farmers and landowners to request the removal of mapped Potential Measures from land, should they wish. DEFRA guidance is clear that the mapping of a Potential Measure would not, by-and-of itself, pose a constraint in achieving planning consent.</p>	None
395	<p>7. Careful consideration of species and actions for wildlife. The list of priority species created as part of each LNRS should be consulted on and align with the government's national species target and ambitions. Actions to support certain species must be carefully considered to avoid causing unintended consequences on farm businesses and food production. If wildlife crossings e.g. green bridges, are being considered in the LNRS, it is important to be aware of the potential risks created by these structures, such as the spread of animal diseases and the need to consult with landowners about their potential location.</p>	<p>The selection of priority species and species assemblages has been undertaken in compliance with DEFRA's statutory and non-statutory LNRS guidance and in collaboration with expert Task and Finish Group members. The public consultation of the Draft LNRS provides opportunity for farmers and landowners to contribute to these lists and spatial prioritisation of Potential Measures.</p>	None



Comment ID	Comment	Considerations	Action
396	<p>8. Farmer choice and flexibility. Prior to publishing the LNRS farmers must be consulted with and given the opportunity to check their lands data and choose how or if their land is mapped in the LNRS. Please do consider the consultation feedback received from the farming industry and if further consultation may be required. Farm businesses evolve and change, the LNRS must be flexible and include a mechanism which enables landowners and farmers to remove, add or change their mapped land or data at any time including once published. Furthermore, under no circumstances should the inclusion of land in the LNRS lead to compulsory purchase or mandatory land use change. Participation must be based on incentive and choice, not compulsion.</p>	<p>The public consultation of the Draft LNRS provides opportunity for farmers and landowners to contribute both to the Strategy and its Local Habitat Map, including the ability to exercise their right to remove mapped Potential Measures from landholdings should they wish. While we agree that land ownership and business models may indeed change over time, once published, the LNRS Regulations require no further editing until Responsible Authorities are instructed by the Secretary of State for the Environment, Farming and Rural Affairs to review and republish their Strategies. LNRS is intended to incentivise land use where this promotes nature's recovery. LNRS does not propose any changes to compulsory purchase legislation.</p>	None
397	<p>9. Joined up LNRS across farmland. Farm businesses cross over LNRS areas, it is vital that neighbouring strategies work together to ensure consistency across boundaries especially in the mapping. There is also lack of clarity how the LNRS will interact with other existing or future initiatives, such as the Land Use Framework and ELMs, it is therefore essential that the government provides guidance and offers further consultation as necessary if overlaps between initiatives arise.</p>	<p>LNRS Regulations require neighbouring Responsible Authorities to consult on the development of Draft LNRS. Additionally, Worcestershire County Council has shared baseline habitat information and collaborated with our Neighbouring Authorities on cross-boundary matters and initiatives, ensuing functional cohesion between adjacent LNRS is achieved. We concur that further clarity on integration between LNRS, the national Land-Use Framework and ELMs would be beneficial, however this is a matter for DEFRA to consider.</p>	None
398	<p>10. Public access to farmland must not be a priority of the LNRS. Public access can bring biosecurity risks, management challenges, and liability issues for farmers. As such, access to farmland should not be prioritised within the LNRS at the expense of food production or nature recovery, and it must remain at the discretion and approval of the farmer or landowner.</p>	<p>Providing or enabling public access is outside of the legal scope of LNRS. LNRS Regulations provide no new or additional statutory powers or rights of access for the general public to the countryside.</p>	None



Comment ID	Comment	Considerations	Action
399	<p>We think you have done an amazing job pulling so much of complexity together so quickly and it's set out and reads really well. We are however concerned that heritage and archaeology, once again and considering it's a key co-benefit, seems somewhat incidental, which is at odds with its contribution to existing habitat assemblages. How it is perceived throughout the document - and the language used - is really important and we believe that's its contribution and potential could be reinforced more clearly and effectively.</p>	<p>Concern noted. The historic environment forms part of LNRS's Headline Principle 'Deliver nature recovery co-benefits'. Opportunities to preserve historic environment features are woven into Potential Measures promoting conservation of ancient woodland, traditional orchards, wood pasture and parkland and ancient grasslands. As such we believe the LNRS aligns well with the 4 Principles set out in Natural England's Nature Recovery and the Historic Environment Guidance and fully with specifications and statutory guidance set out by DEFRA for LNRS preparation. Noting the important role that our heritage and archaeology plays in the conservation of our natural environment, we can further highlight this co-benefit with additional text.</p>	<p>Additional section to be added to 'landscapes important for biodiversity'</p> <p>Wording of Potential Measures to be strengthened to reflect preservation of historic environment and landscape features</p>
400	<p>Section 7 and chapter 3.3 set out the wider environmental benefits of nature recovery with nine co-benefits defined. The alignment with the Ecosystem Services framework is a logical step towards identifying wider opportunities that can deliver through mechanisms, such as green infrastructure, that are well-placed to develop multifunctional designs. However, we suggest that landscape and historic character should be added as a 10th important co-beneficiary of nature recovery. The relationship is a two-way process with patterns of landscape and historic landscape character coupled with pre-historic/historic features and their settings contributing a pre-existing network of related habitats that forms a framework for enhancement and the creation of wider connectivity. The benefits that nature recovery can deliver include (for example):</p> <ul style="list-style-type: none"> ❁ enhancements to the setting of heritage features, historic buildings and significant (not just protected) landscapes ❁ the protection and/or restoration of sustainable hydrological conditions through wetland reversion that could stabilise conditions for buried environmental deposits, preserved organic structure, nationally significant peat levels and historic water management features ❁ the restoration of historic fieldscape hedgerows, including new hedgerow trees, as part of measures to reconnect linear habitats ❁ the restoration and creation of lowland heath and acidic grassland that historically was a major feature of Worcestershire's landscape linked with large-scale animal husbandry and droving – an economic and social activity that has shaped the character of key valued landscape and habitats <p>There are many more examples that can be shared, however, the point is really to emphasise the significant flow that defies the co-benefit.</p>	<p>These are helpful examples of the environmental co-benefits available through LNRS delivery and we agree that the strategy should articulate these benefits and considerations in project design and delivery. However, we feel that the most appropriate way to do this is ensure that historic environment and landscape is woven throughout the document and the Potential Measure.</p> <p>Additional text can also be added to relevant StoryMaps to highlight the environmental benefits capable of being secured through well designed projects. To that end any case studies available (eg Bradgate Park in https://historicengland.org.uk/content/docs/advice/nature-recovery-historic-environment/) would be most welcomed.</p>	<p>Additional section to be added to 'landscapes important for biodiversity'</p> <p>Wording of Potential Measures to be strengthened to reflect preservation of historic environment and landscape features</p> <p>Footnote reference to be added to: https://historicengland.org.uk/content/docs/advice/nature-recovery-historic-environment/</p> <p>Additional text and references to be included in relevant StoryMaps (eg PM3, 8, 16/17, 19, 26 and 30).</p>



Comment ID	Comment	Considerations	Action
401	We note that we are not referenced in the Responsible Authority internal stakeholders.	Due to document size constraints a detailed list of all RA internal stakeholders is not presented within the LNRS however all partners and organisations who have contributed towards LNRS's Steering Group and Task and Finish Groups have been acknowledged in the separate Stakeholder Engagement Report which is available on the LNRS web pages.	None
402	4.1 Creating a vision is always a tough task, given the necessity to draft a statement that is succinct and purposeful, yet covers the many points of importance. However, this vision has achieved all of those aims. I suggest one minor addition to the first sentence that should read: ...achieving more, bigger, healthier, better connected landscapes and natural habitats that are... The addition of landscapes, we believe, will help to reinforce the message that strategic aims are an important aggregate of what the LNRS is promoting.	Noted and agreed.	Text amended
403	One question concerning climate change adaptation: The LNRS rightly focuses on issues and opportunities for betterment, however, one potential constraint might be the proliferation of solar farm developments, which we are already seeing a significant number of in Worcestershire. We understand that solar farms bring opportunities to enhance habitats through BNG and landscape mitigation schemes, but is it the case that the strategy should identify renewable energy schemes as a constraint where nature recovery measures will need to be adapted to effectively coexist with energy schemes where there may be a divergence from the priorities identified for an affected landscape?	The national requirements for energy security are one of many land-use drivers with which nature's recovery must be carefully designed. However, unlike many development types solar PV schemes are perhaps uniquely a temporary and reversible land-use. As such, developmental design of PV sites can be inter-operable with the objectives of many LNRS Potential Measures, particularly Mosaic and Open habitat assemblages. Potential Measure 48 is designed to promote design integration within solar PV developments of actions and good practice measures which will promote nature's recovery. This PM is unmapped so capable of being implemented on future PV developments which are not currently allocated sites in Local Development or Local Energy Plans.	None

Comment ID	Comment	Considerations	Action
404	<p>Enhancing landscapes and protecting heritage and the historic environment are, later in the document, briefly referenced as co-benefits to nature recovery (section 4.2) but - certainly in terms of heritage, it feels like a missed opportunity to emphasise that historic landscapes and sites are fully valued as a significant component of an integrated environment. The risk is that in terms of promoting and developing LNRS-led conservation and enhancement projects that these environmental connections could be easily overlooked. There are many opportunities to highlight the links and benefits with key habitats, such as orchards, grasslands, parklands, old routeways and wet sites, and this could, perhaps, be woven into the Habitat Potential Measures without diluting the key aim.</p> <p>The risk is one that we have faced many times across the historic environment sector. That being, if the historic environment is not fully integrated as a key theme, opportunities to deliver wider environmental and cultural betterment will be overlooked with features potentially damaged as a result of on the ground delivery.</p> <p>Overall, the message, and the range of opportunities the historic environment can bring to an integrated approach, could be strengthened. We again flag the Natural England publication: Nature recovery and the historic environment that sets out far more eloquently the range of relationships and opportunities.</p>	Noted and agreed.	Additional text to be added to relevant StoryMaps (including PM3, 8, 16/17, 19, 26 and 30) highlighting importance of considering wider environmental and cultural improvements which a scheme is capable of delivering. Additional signposting to good practice guidance to be included and any available case studies would be welcomed.
405	<p>*redacted text* welcome Worcestershire's Draft Local Nature Recovery Strategy (LNRS) and its strategic approach to nature recovery. As a significant landowner in the county - including interests at Honeybourne Airfield (Wychavon District), farmland near Grimley (Malvern Hills District) and Hartlebury, and land south of Druids Heath (Bromsgrove District) - they are committed to enhancing biodiversity on their estates. *redacted text* are instructed to represent *redacted text* in relation to their strategic land interests at Honeybourne and Druid's Heath respectively; and *redacted text* are instructed to advise on planning matters in respect of their strategic portfolio.</p> <p>These representations are prepared in respect of their strategic and rural land interests. We recognise the LNRS's potential to identify opportunities for biodiversity net gain delivery, which can help unlock development sites by providing clarity on where off-site habitat enhancements would be most beneficial. This role is pivotal given the Government's ambitions for housing delivery and infrastructure over the next 5 years.</p> <p>In this context, the LNRS can guide conservation efforts while facilitating sustainable development to meet housing and infrastructure needs. We appreciate the chance to comment on the draft LNRS and wish to ensure it effectively balances nature recovery with the county's development aspirations. Our response provides general comments and key recommendations, followed by site-specific feedback related to *redacted text* landholdings.</p>		Support noted and welcomed.



Comment ID	Comment	Considerations	Action
406	<p>We would like to commend the user-friendly nature of the interactive Local Habitat Map. Our team found it generally easy to navigate and particularly valued the ability to click on mapped features to see their associated Potential Measure details. For the final LNRS, we suggest a minor improvement: consider adding a “toggle all layers on/off” function. This would allow users to de-clutter the map and inspect individual measures or categories one at a time, which is useful when assessing multiple landholdings. Overall, the map is a powerful tool for land managers to identify opportunities for contributing to nature recovery, and we look forward to utilising it as we develop land management plans for areas like Grimley.</p>		<p>Comment noted and welcomed. The toggle all layers on/off functionality will be built into the final map tool.</p>
407	<p>*redacted text* consider that the draft LNRS could more explicitly acknowledge its role in enabling both biodiversity restoration and appropriate development. By identifying strategic locations for habitat creation or enhancement, the LNRS will facilitate the efficient delivery of mandatory BNG associated with planning applications. This is especially important in light of recent planning reforms and rising housing targets – Worcestershire’s districts have all seen significant increases in housing need under the Government’s revised Standard Method. We suggest that the final LNRS includes narrative on how nature recovery opportunities can be aligned with areas of planned growth, ensuring that new homes and infrastructure are accompanied by strategic habitat gains. In short, making nature recovery an integral part of growth will help meet biodiversity duties and the pressing need for housing.</p>	<p>We agree that these are important roles through which LNRS can contribute towards both sustainable growth and nature’s recovery. This role is described in both the Draft LNRS’s Executive Summary, within the sub-section describing the Role of LNRS, Section 3.1 describing LNRS’s role in steering Biodiversity Net Gain, Sub-section 4.1 which sets “Our Vision for Worcestershire” (particularly: sections which describe how LNRS will “require development to bring nature into better condition” and “guide land management decision-making”), and is also described in detail in Supporting Activities, and text describing The Role of Responsible Authorities in LNRS implementation. This provides sufficient acknowledgement of LNRS’s role enabling biodiversity restoration and sustainable development. Close working with each of Worcestershire’s Local Planning Authorities during the development of the LNRS ‘Issues and Options’ Consultation and the Draft LNRS preparation ensures Potential Measures align with the aspirations as currently articulated in both adopted and emerging Local Development Plans, and as such we are satisfied the existing narrative on the role of LNRS in helping deliver sustainable development, biodiversity net gain and nature’s restoration is sufficient.</p>	<p>None</p>

Comment ID	Comment	Considerations	Action
408	<p>We emphasise that inclusion of land in the LNRS's habitat opportunity map must not be interpreted as a statutory designation or a presumption against development. The Environment Act intends LNRSs to inform local plans and projects, but they do not confer protected status. The draft LNRS text at Page 6 states that decision-makers should "take account of any published LNRS" to ensure land important for nature recovery is considered in planning. While we support informed decision-making, this wording risks implying that LNRS-identified land enjoys a protective status akin to a Local Wildlife Site or Green Belt. Further clarity is needed that the LNRS is a guiding framework and evidence base, not a part of the statutory development plan. Local Planning Authorities should have regard to the LNRS, but it should not automatically constrain other land uses. This important distinction should be clearly communicated (for instance, in the LNRS foreword or implementation section) so that councillors and officers understand that LNRS mapping of opportunities is advisory and can co-exist with sustainable development proposals. <i>*redacted text*</i> will continue to promote their land for development in parallel with nature recovery initiatives, and we believe the two objectives can work if the LNRS remains flexible and enabling.</p>	<p>The legal requirement for plan-makers to "take account" of Local Nature Recovery Strategies is a change to planning law contained within the Levelling Up and Regeneration Act (LURA) 2023. Further guidance will be published by MHCLG and DEFRA on this responsibility. Both the LNRS Regulations, DEFRA's statutory guidance and Worcestershire's Draft LNRS user guidance documents are clear that LNRS does not confer any new land designations or new legal protections for land holdings. We will ensure that this message is replicated with sufficient visibility for all users in guidance supporting the Final LNRS.</p>	None
409	<p>The final LNRS should demonstrate how it supports the emerging local plans in Worcestershire. Housing and economic growth areas might be mentioned in the LNRS as places where nature recovery could be targeted alongside new development (e.g. encouraging creation of greenspace corridors through urban extensions or identifying nearby sites for off-site BNG habitat banks). By proactively aligning with growth, the LNRS can help avoid conflicts and instead foster a net gain culture where developers, planners, and conservationists collaborate on delivering both homes and habitats.</p>	<p>We agree that sustainable housing and economic growth is one of the important mechanisms through which nature's recovery can be achieved. As such, elements such as Green Infrastructure and landscape-scale and linear Habitat Connectivity have been identified as key contributors within the Draft LNRS's Biodiversity Priorities. We've further addressed these opportunities through a specific Potential Measure: PM38, "wildlife habitats in the built environment", which identifies opportunities through which both new and retrospective development can deliver new habitats and opportunities for wildlife to thrive.</p>	None

Comment ID	Comment	Considerations	Action
410	<p>Biodiversity Priority 33</p> <p>The draft LNRS introduces the term “core sites” in Priority 33 (under the Habitat Connectivity theme), aiming to increase the number of core sites under effective conservation management. However, the term “core sites” is not defined in the document. For clarity and to avoid misinterpretation, we recommend adding a definition in the strategy or glossary. Defining this term will make it clear that LNRS Opportunity Areas are distinct from existing core biodiversity sites. This distinction is important so that, for instance, a development site falling within an LNRS opportunity mapping is not mistakenly treated with the same policy weight as an established SSSI or reserve. The LNRS’s effectiveness will be improved by clearly distinguishing areas that need protection (existing core sites) from areas that offer opportunities.</p>	<p>DEFRA guidance indicates that LNRS must aim to promote creation and restoration of habitats (rather than protection measures). Opportunities therefore exist both to enhance the condition of existing ‘core’ sites and also to focus habitat creation or restoration efforts where these habitats don’t already exist.</p> <p>In 2022, Gloucestershire Centre for Environmental Records developed a draft Nature Recovery Network for the tri-county Herefordshire/Worcestershire/Gloucestershire LNRS areas and in so doing created a definition of NRN ‘core’ sites. Each PM’s StoryMap articulates the process from which these NRN ‘core sites’ have underpinned the modelling of discrete PM target areas which are the focus of LNRS delivery. LNRS does not provide or propose any new forms of ‘protection’ of any NRN ‘core’ sites; the extent and distribution of ‘core’ sites has aided the process of targeting proposed Potential Measures. The terminology ‘opportunity areas’ are not used in the Worcestershire LNRS.</p>	<p>Wording of PM23 amended</p> <p>Definitions of Worcestershire Core Nature Network and Worcestershire Nature Recovery Network added to strategy document and glossary for clarification</p>



Comment ID	Comment	Considerations	Action
411	<p>Biodiversity Priority 36 and Potential Measure 45</p> <p>We acknowledge Priority 36 which aims to “Reduce the harm to wildlife caused by artificial light at night,” and the associated Potential Measure 45 calling for maintaining dark corridors. *redacted text* support efforts to limit light pollution to benefit bats, insects and other nocturnal wildlife. We are implementing such measures in practice. However, we suggest rewording of this priority to focus on design and mitigation rather than a restriction. Artificial lighting does provide important public benefits (road safety, personal security, facilitating outdoor recreation) and some level of lighting is often necessary. We propose that Priority 36 and PM45 be reframed along the lines of: “Ensure that any necessary outdoor lighting is designed in line with best practice to minimise harm to wildlife (e.g. avoiding illumination of hedgerows, using shields and warm-spectrum LEDs, and retaining unlit ‘dark corridor’ areas wherever feasible).” This approach acknowledges the need for lighting in certain situations, including operational farm needs and new developments, while committing to mitigation of ecological impacts. Local planning processes already assess lighting impact through ecological reports and can impose conditions to secure sensitive lighting. The LNRS should support this balanced approach, rather than imply a no light policy.</p>	<p>We agree that lighting can be a necessity for public safety however we do not feel that PM45 is in conflict with Planning Authority’s statutory requirements or adopted adoption processes where these have been set out, e.g. in Highways Act requirements and British Standards for Street Lighting or the Worcestershire Streetscape Design Guide.</p> <p>PM45 wording recognises artificial light at night is a requirement including in ecologically sensitive areas, and is aligned with the ILP’s technical guidance note GN08/23, which is clear that master planning should consider and, where possible, avoid designing scenarios where illumination is requirement for user safety, with subsequent adverse impacts to ‘core’ wildlife habitats.</p> <p>Amending PM wording to supporting delivery of mitigation measures in preference to highlighting the benefits which good design practice aligned with the mitigation hierarchy can provide, would fail to properly engage with ILP GN08/23 and the established mitigation hierarchy, as illustrated in Figure 2 of GN08/23.</p> <p>For clarity: the LNRS does not propose a ‘no light policy’; PM 45 and 46 recognise the need to use artificial light at night and is worded so as to help identify discretely targeted areas of particular ecological sensitivity and to guide mitigation strategies where these are predicted to provide the greatest conservation benefits in the scenario that illumination in these areas is an unavoidable design requirement (e.g. for safe farm operation or highway use).</p> <p>We agree that this can be further clarified through good practice examples and case studies which will be added to the StoryMap.</p>	<p>Additional best practice guidance and case studies to be added to PM45</p>

Comment ID	Comment	Considerations	Action
412	<p>Biodiversity Priority 35</p> <p>Verges can form important wildlife corridors and pollinator habitats. We suggest that road safety must not be compromised, a point also made in Potential Measure 48 (regarding selective and careful cutting). We recommend Priority 35 or its supporting text include a reminder of verge management that balances ecological value with maintaining clear sightlines at junctions and along highways. This will encourage Highway Authorities to adopt wildlife friendly without impacting safety.</p>	<p>Noted and agreed. Please note that the management by WCC of the road verge network is aligned with Plantlife’s Good Verge Guidance, which states: “roads must be kept safe for all users, and that cutting safety cuts, sightlines and junctions are a priority and must be carried out to ensure safety”</p>	<p>Additional signposting to be added to PM47 to Plantlife’s Good Verge Guidance: https://www.plantlife.org.uk/wp-content/uploads/2023/03/Good_verge_guide_2021.pdf</p>



Comment ID	Comment	Considerations	Action
413	<p>Built Environment – Potential Measure 38 and Green Infrastructure Priorities</p> <p>*redacted text* support the principle that new developments and urban areas should be designed to be wildlife friendly. Many of the ideas in PM38 (and related Green Infrastructure priorities 40–42) reflect best practices that we are keen to implement: increasing urban tree cover, installing features like hedgehog highways, swift/bat bricks, creating ponds and green corridors, and linking urban green spaces to wider nature networks. Large-scale developments, such as our promoted site at Druids Heath, present opportunities to embed these features from the outset. To strengthen PM38 the following two suggestions are made:</p> <ol style="list-style-type: none"> 1. Align Tree Canopy Targets with National Policy: PM38 currently suggests aiming for a minimum 20% urban tree canopy cover. We note that the Environmental Targets (Woodland) Regulations 2023 (under the Environment Act 2021) set a national goal of 16.5% tree canopy cover in England by 2050. We propose that PM38 be revised to “aim for at least 16.5% tree canopy cover in the built environment by 2050”, rather than 20% with no timeframe. This still represents an ambitious increase, and it ties local action to the nationally recognised target. 2. Several elements of PM38 overlap with what is standard practice through national planning policy, local design guides, and Biodiversity Net Gain guidance. Instead, the strategy could encourage LPAs to incorporate these principles into their Local Plans and Supplementary Planning Documents. This way, they become part of the holistic planning process. We want to ensure that PM38 is seen as a collaborative guidance, and not as adding another layer of potentially conflicting regulation. 	<p>Support noted and welcomed.</p> <ol style="list-style-type: none"> 1. The target of 16.5% canopy cover is for all woodland and trees outside woodland, across all of England. The target of 20% within PM38 is for urban tree canopy cover. The figure of 20% is that recommended within a Forest Research-led study into the benefits of trees in England’s towns and cities to improve human health and well being. It is considered appropriate for the LNRS to use this target within PM38. https://charteredforesters.org/resource/doick-et-al-the-canopy-cover-of-englands-towns-and-cities-research-paper <p>Potential Measures focused on incentivising tree planting and woodland creation outside of urban locations (PM12, PM14) do not set numerical targets (on the advice of Defra Arms-Length Bodies).</p> <ol style="list-style-type: none"> 2. Local Planning Authorities, by implementing their duty to consider LNRS, could elect to integrate the objectives set out in PM38 into Local Development Plan policy and/or Supplemental Planning Documents. Noting that LNRS cannot require or compel delivery of any Potential Measures by stakeholders and that there is considerable variety across Worcestershire in biodiversity requirements set out in adopted Local Plan biodiversity policies, LNRS has a unique role to play in articulating a county-wide and consistent approach for nature’s recovery in the built environment. LNRS can positively guide the preparation of future Local Plan and Neighbourhood Plan policies to consistently include nature recovery measures, but LNRS can also provide guidance and advice to stakeholders wishing to enhance the built environment through activities outside the regulatory scope of Local Development and Neighbourhood Plans (eg activities not requiring planning consent). 	None

Comment ID	Comment	Considerations	Action
414	<p>Honeybourne Airfield, Wychavon District</p> <p>Honeybourne Airfield is a 178.64-hectare site south of Honeybourne village. It is largely arable farmland with some brownfield characteristics. The site is not covered by any statutory designations. It is bordered by open countryside and a small Industrial Estate. Two villages, Honeybourne and Bretforton, lie nearby and have identified needs for improved community infrastructure. Notably, the northern portion of the site lies within Flood Zones 2 and 3 (associated with the River Isbourne/Avon), and the Cotswolds National Landscape lies 1.2 km to the south. *redacted text* are promoting a vision for Honeybourne Airfield as a sustainable, well connected neighbourhood delivering housing and community facilities in line with local needs. This would be a comprehensively planned settlement integrating green infrastructure and biodiversity enhancements at scale. We believe this site can simultaneously accommodate development and achieve significant nature recovery gains. The Draft LNRS Local Habitat Map indicates several 'Potential Measures' on or adjacent to this site, including:</p> <ul style="list-style-type: none"> ❁ Potential Measure 33 – Create New Arable Wildflower Sites: Suggesting wildflower-rich field margins or headlands on arable land, to benefit rare arable flora and act as “stepping stones” between existing wildflower-rich sites. ❁ Potential Measure 3 – Revert Land to Wet Grassland and Floodplain Meadow: Suggesting restoration of wet grassland habitat on land currently under arable or improved, managed by grazing or hay-cutting to achieve species-rich floodplain meadow. ❁ Potential Measure 2 – Create Riparian Buffer Zones: Suggesting the creation of uncultivated, chemical free buffer strips along watercourses, incorporating wetland habitats to protect water quality and enhance riparian habitat connectivity. ❁ Potential Measure 45 – Reduce Levels of Artificial Light at Night (Dark Corridors): A measure aiming to maintain dark corridors for nocturnal wildlife by controlling light pollution (using only necessary lighting, warmer spectra, shielding lights from shining on hedgerows/watercourses, etc.). <p>These measures correspond well to the site’s characteristics. For example, the northern third of Honeybourne Airfield, being in a floodplain, is suited to wet grassland restoration and riparian buffers, while the extensive arable fields elsewhere present opportunities for wildflower margins. In principle, *redacted text* welcome these nature recovery ideas.</p> <p>Our primary concern is to ensure that the LNRS’s mapping of these opportunities does not impact the site’s future sustainable development. Any future planning application for Honeybourne Airfield would thoroughly assess environmental impacts and propose mitigation/compensation and Biodiversity Net Gain. We note, for example, that PM03 targets floodplain areas for wet grassland – this makes sense under current conditions. However, if in the future flood risk data is updated or mitigation measures alter the extent of functional floodplain, the LNRS should be flexible enough to adjust mapping accordingly. In other words, opportunity areas in the LNRS are not fixed constraints but should respond to the best available data over time. In summary, we support the draft LNRS’s identified measures and would incorporate many of them into development proposals. We request that the final LNRS text or implementation plan clarify that these are opportunities, not obligations, and that pursuing them will be balanced with other objectives such as meeting local housing needs. We believe Honeybourne Airfield can deliver both new homes and a net gain for nature, and the LNRS should recognise and support this dual potential.</p>	<p>We are pleased that the Potential Measures mapped in this location are considered to be the right ones and that they will support the delivery of high quality outcomes for nature alongside future sustainable development.</p> <p>The wording of the strategy is already explicit that Potential Measures are voluntary actions and that their purpose is to suggest the best actions in the best places to deliver the best outcomes for nature. Once published, the Local Habitat Map cannot be amended until the Secretary of State instructs a review of LNRS. However, the final LNRS will contain a clear 'caveat' stating the necessity of carrying out surveys and obtaining the relevant consents and permissions before undertaking work, which should allow changes in ground conditions or available data to be reviewed and considered.</p>	None

Comment ID	Comment	Considerations	Action
415	<p>Farmland at Grimley (and Hartlebury), North Worcestershire</p> <p><i>*redacted text*</i> have agricultural land interests in north Worcestershire, including parcels in the Grimley area (north of Worcester) and near Hartlebury. These are working farms currently, comprising arable land with some pasture and ponds. They are not formally allocated for development at this time, however, we explore opportunities for enhancement and potential future uses. We have reviewed the LNRS mapping for these landholdings and wish to raise a few points to ensure the strategy's accuracy and effectiveness:</p> <ul style="list-style-type: none"> ✿ Pond Cluster Enhancements (PM07): One of the land parcels at Grimley, specifically east of Camp Lane, is highlighted under Potential Measure 07, which aims to “create and enhance wildlife ponds and surrounding habitat in high-density and high-value pond areas.” While we have no objection to this measure, we seek clarification on the site selection criteria. In the Grimley case, the parcel lies roughly 200m from the nearest existing ponds and is separated by features like roads and thick hedgerows. These physical barriers could limit amphibian movement between our land and the ponds. We question whether this location truly qualifies as a “high-density/high-value” pond area, and whether other land closer to the ponds (without such barriers) might be more suitable for PM07 efforts. To improve the LNRS’s impact, we suggest that factors such as distance to known ponds and presence of dispersal barriers be considered when mapping PM07 opportunities. Targeting areas immediately adjacent to significant pond clusters (or where habitat connectivity can readily be improved) would likely yield better outcomes for species like great crested newt. ✿ Neutral Grassland Creation (PM29): Our Grimley holding is also identified for Potential Measure 29, “create new and/or enhance existing areas of neutral grassland.” We note that the LNRS habitat data itself indicates only a 26% confidence that this particular land is currently. We are concerned that including large areas of arable land under PM29 might dilute the focus from places that are genuinely grassland or well-suited to meadow restoration. It might also create an impression that those arable fields should be converted to grassland regardless of other considerations. We recommend the LNRS refine the mapping for PM29 to prioritise areas with a higher likelihood of existing grassland or suitable conditions. ✿ Local Wildlife Site Management (PM41): Potential Measure 41 is about enhancing habitats of designated sites via appropriate management. Upon reviewing the LNRS map, it appears that one of our Grimley land parcels has been mistakenly tagged under PM41, even though it is not a designated site of any kind. We request that the Local Habitat Map be corrected to remove our Grimley parcel from PM41, unless there is evidence of a designation that we and the local authorities are unaware of. 	<p>PM7: This location at Grimley is within a ‘Pondscape’, which are defined within the LNRS as areas containing at least 2.4 ponds per square kilometre within a contiguous landscape of 500 hectares or more. See https://arcg.is/q59nf1. The modelling methodology used to define pondscales was compared with a national Lost Ponds dataset to identify locations where the creation or recreation of ponds could de-fragment parts of the pondscape where habitat has been lost over time.</p> <p>PM29: Location appears to be intensive grass. Potential Measures are advisory/voluntary and don't impose any restrictions on management. There are still opportunities for restoration to better quality grassland if this became a financially viable option. This Potential Measure will have been suggested in this location because of the proximity to the Grassland Inventory Site (see below).</p> <p>PM41: There is a Grassland Inventory Site adjacent to the area in question. The associated Potential Measure 41 mapping doesn't overlap with the land ownership polygon provided by the respondent, but the 50m buffer of Potential Measure 42 does. As above, Potential Measures are advisory/voluntary and don't impose any restrictions on management, but changes to land management within this buffer have the potential to support an improvement in the condition of the Grassland Inventory Site.</p>	None

Comment ID	Comment	Considerations	Action
416	<p>Wording of Potential Measure 38:</p> <p>Overall, *redacted text* are supportive of PM 38 and consider that landscape-led masterplans for new development provide good opportunities to improve the connectedness and quality of wildlife habitats by providing green active travel corridors and linking urban green spaces. The first point in this measure states that “as a minimum, decision-makers should seek to increase urban tree canopy cover, aiming for a minimum of 20%, through, for example, planting street trees, trees in green spaces, hedgerows, community orchards, or small woodland blocks, strips or corridors”.</p> <p>The Environmental Targets (Woodland and Trees Outside Woodland)(England) Regulations 2023 specifies a long-term target in accordance with the Environment Act 2021 that by the end of 2050, at least 16.5% of all land in England is covered by woodland and trees outside woodland. *redacted text* consider that the proposed measure should be revised to align with the national targets for tree canopy cover and should include timescales for meeting this canopy cover. Therefore, it is suggested that the proposed measure seeks a minimum of 16.5% urban tree canopy cover by 2050.</p>	<p>The target of 16.5% canopy cover is for all woodland and trees outside woodland, across all of England. The target of 20% within PM38 is for urban tree canopy cover. The figure of 20% is that recommended within a Forest Research-led study into the benefits of trees in England’s towns and cities to improve human health and well being. It is considered appropriate for the LNRS to use this target within PM38.</p> <p>https://charteredforesters.org/resource/doick-et-al-the-canopy-cover-of-englands-towns-and-cities-research-paper</p> <p>Potential Measures focused on incentivising tree planting and woodland creation outside of urban locations (PM12, PM14) do not set numerical targets (on the advice of Defra Arms-Length-Bodies).</p>	None
417	<p>Land south of Druid’s Heath:</p> <p>Potential Measure Layer and Name: PM08 – Create and Enhance Wetland Habitats Location ID: 31858</p> <p>*redacted text* consider that the mapping of the proposed Potential Measure PM08 should be removed from this location, referenced as 31858 and outlined in purple in the Figure 1. It is considered that the location is not suitable for the development of wetland habitats due to the existing ecological features on the site. It is unclear why this land has been proposed for the creation of wetland habitat as there are no existing water bodies or natural connections in this location.</p> <p>In addition, the land is being promoted for residential-led development, with the majority of this land proposed to be developed for housing and a recreational park. The aim of Potential Measure 08 is to increase the coverage of wetland habitats, however as this land is being promoted for development, it is unlikely to align with the proposed mapping due to reduced extent of land available and recreational pressures which would impede the success of this measure. It is considered that the proposed mapping would not align with the masterplan vision which has the potential to support the LNRS biodiversity priorities and aspirations much more widely. It is therefore considered that an alternative site could provide a more vital contribution to this measure.</p>		PM8 mapping removed in this location



Comment ID	Comment	Considerations	Action
418	<p>Land south of Druid's Heath: Potential Measure Layer and Name: PM07 – Create and enhance wildlife ponds and surrounding habitat in high-density and high-value pond areas Location ID: Unknown – unmapped location</p> <p>The Draft Local Habitat Map identifies existing ponds that could become of importance for biodiversity through proposed measures. An existing pond located within <i>*redacted text*</i> landholdings south of Druids Heath is not currently identified in the mapping. <i>*redacted text*</i> consider that the pond outlined in red in Figure 2 should be mapped under Potential Measure 07 to 'Create and enhance wildlife ponds and surrounding habitat in high-density and high-value pond areas. It is considered that ensuring this land is mapped will support Biodiversity Priority 5, to improve the condition of ponds and the number of ponds that qualify for priority pond status.</p>		PM7 mapping extended in this location
419	<p>Land south of Druid's Heath: Potential Measure Layer and Name: PM01 – De-culvert and re-naturalise watercourses + PM02 – Create riparian buffer zones Location ID – 17483 (currently mapped for PM45 only)</p> <p><i>*redacted text*</i> consider that the Chin Brook corridor should be identified within the Draft Local Habitat Mapping for the Potential Measure 01 to 'de-culvert and re-naturalise watercourses' and Potential Measure 02 to 'create riparian buffer zones'. While parts of the Chin Brook corridor are correctly identified, the area outlined in purple in Figure 3 (location ID 17483), is not and <i>*redacted text*</i> consider that it should be mapped as there are opportunities to enhance ecological functions of the brook and the corridor through re-naturalisation and riparian buffering. This location is considered a particularly good opportunity given its location close to the urban environment.</p>		PM1 and PM2 mapping added/ extended in this location
420	<p>Land south of Druid's Heath: Potential Measure Layer and Name: PM23 – Create and enhance a habitat mosaic Location ID: unknown – unmapped location</p> <p><i>*redacted text*</i> consider that the potential measure 'PM23 – Create and enhance a habitat mosaic' should be mapped in relation to the existing dense mixed scrub located in the centre of the proposed site (see Figure 5). Where these habitats exist, they provide an opportunity to align with Biodiversity Priority 18, to increase the amount of well-managed scrub habitat.</p>		PM23 mapping added in this location



Comment ID	Comment	Considerations	Action
421	<p>Land south of Druid's Heath:</p> <p><i>*redacted text*</i> land south of Druids Heath has potential to deliver LNRS grassland objectives as part of a comprehensive, landscape-led masterplan, particularly through lowland meadow creation and enhancement. By buffering Berry Mound Pastures SSSI, expanding species-rich grassland within transitional and corridor areas, and linking to existing meadows in Walkers Heath Park, the land south of Druids Heath can play a role in restoring Worcestershire's grassland networks.</p> <p>Potential Measure Layer and Name: PM23 'Create and enhance a habitat mosaic' + PM29 'Create or enhance species rich neutral grassland'</p> <p>Location ID: unknown – unmapped location</p> <p>In particular, <i>*redacted text*</i> consider that the potential measures 'PM23 – Create and enhance a habitat mosaic' and 'PM29 – Create or enhance species rich neutral grassland' could be extended to include <i>*redacted text*</i> land southeast of the A435 (outlined in red in Figure 6). It is considered that this land would provide a good opportunity to create new species rich grassland, with the potential to take a habitat mosaic approach to incorporate scrub, orchards and ponds where appropriate. The land will in part be required to accommodate a new roundabout, however the remaining land provides an opportunity to create green links and ecological mosaics, and increase the existing biodiversity of the site.</p>		PM23 and PM29 mapping added in this location
422	<p>Land south of Druid's Heath:</p> <p>Due to the site's location directly south of the built up area of Druids Heath and the wider Birmingham City and connection with the rural land south of the site, proposed development of the site provides an opportunity to improve access to green space while embedding ecological corridors that link outwards. In particular, there are opportunities for ecological buffers with the Chin Brook corridor, green links across the masterplan site, providing connections with the wider rural habitats and SSSI influence zones. As part of a landscape-led masterplan for the site, through measures such as hedgerow lattices, pond clusters, green spines and transitional buffers, the land south of Druids Heath could play a key role in connecting local wildlife sites, strategic nature corridors and wider regional SSSI assets.</p>	Noted and welcomed	None
423	<p>Land south of Druid's Heath</p> <p>The proposed development of land south of Druids Heath as part of a comprehensive, landscape-led masterplan, will provide ample opportunities to align with the LNRS priorities. In particular, through the ecological enrichment of existing ecological assets, delivery of green corridors across development parcels, management of lighting and riparian buffers along Chinn Brook. Implemented measures would create a multifunctional landscape supporting biodiversity, climate adaptation and community wellbeing across a comprehensive masterplan.</p>	Noted and welcomed	None



Comment ID	Comment	Considerations	Action
424	<p>As with our previous advice there are many synergies to be had between the historic and natural environments. Conservation and enhancement of the natural and historic environments can go hand in hand and are an important facet of sustainable development.</p> <p>The draft LNRS sets out the rich tapestry of habitats that Worcestershire has to offer and the identification and inclusion of these are welcomed. However, such multi-functional spaces should be considered not only in terms of the natural environment, health and recreation but also how the historic environment can contribute to and work alongside these aims.</p> <p>It is important to recognise that the historic environment, like the natural environment, is irreplaceable and includes designated assets that are protected. It can be helpful to understand the nature and significance of the historic environment within your plan area or scheme so as avoid any potential conflicts with its conservation.</p> <p>Many sites designated and protected for their ecological importance display that interest because they are heritage assets. At such sites, past human activity, specific design or functional considerations, and long periods of sustained and targeted management have led to a concentration of habitats and features supporting protected species.</p>	<p>Advice noted. The historic environment forms part of LNRS's Headline Principles "protecting heritage and the historic environment" in Delivering nature recovery co-benefits, with key constraints and opportunities woven into Potential Measures promoting conservation of heritage assets including ancient woodland, traditional orchards, wood pasture and parkland and ancient grasslands. As such we believe the LNRS aligns well with the 4 Principles set out in Natural England's Nature Recovery and the Historic Environment Guidance and fully with specifications and statutory guidance set out by DEFRA for LNRS preparation. Further advice will be included in the Local Habitat Map to encourage further consideration of the historic environment at site-level when designing projects.</p>	<p>Amend wording of LNRS 'caveat' to better reflect historic environment and heritage.</p> <p>Text to be added to strategy to better highlight the opportunities for nature recovery through protection and enhancement of historic features and their setting.</p> <p>Include additional text in Local Habitat Map advising consideration of historic environment constraints and opportunities before undertaking any works.</p>



Comment ID	Comment	Considerations	Action
425	<p>Such sites often preserve ancient and veteran trees and cultivate both native and introduced specimens which serve as important natural resources for foraging opportunities and associated habitats, supporting impressive amounts of wildlife as you set out in the draft LNRS.</p> <p>In addition, moats, canals, lakes and other defensive or ornamental water bodies as well as ditches, leats and other modified watercourses provide ranges of aquatic habitats. Long established woodland and grassland communities support an array of plants, fungi and invertebrates associated with undisturbed soils and aid in carbon sequestration. Historic ornamental and functional structures provide shelter and breeding opportunities for protected species.</p> <p>Whilst these elements are referred to in the draft LNRS, the association with the historic environment is not embraced. It may be helpful to make reference, in Section 3.3 of the Strategy, to the role that the natural environment can have to play in adding positive benefits to the historic environment. It can be used to:</p> <ol style="list-style-type: none"> 1. conserve and enhance heritage assets 2. improve the setting of heritage assets 3. improve access to heritage assets 4. create a sense of place and tangible link with local history 5. create linkages between heritage assets and local nature recovery sites <p>Likewise, the historic environment can help contribute to the quality, character and distinctiveness of green spaces and the natural environment by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link new networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of natural networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.</p> <p>Including heritage assets within your strategy and seeking to manage them effectively, and with policies and actions that are appropriate for such assets, may also bring about addition value and sense of place. We recommend that the draft LNRS seeks to highlight these synergies and the ways in which the natural and historic environment can complement one another.</p>	<p>Noted and agreed. These are helpful examples of where conservation of the natural environment also provides cultural co-benefits in conserving our historic environment. Additional text will be added to Section 3 to include these examples within the Health and Wellbeing Environmental Co-Benefit. Additional text can also be added to relevant StoryMaps highlighting the environmental co-benefits capable of being secured through well designed projects. To that end any case studies which can be contributed would be most welcomed.</p>	<p>Additional text to be added to 'Health and Wellbeing' co-benefit. Footnote reference to be added to: https://historicengland.org.uk/content/docs/advice/nature-recovery-historic-environment/</p> <p>Additional text and references to be included in relevant StoryMaps (eg PM3, 8, 16/17, 19, 26 and 30).</p>
426	<p>The Strategy should acknowledge links between nature recovery sites and heritage assets in the area and set an appropriate methodology for considering prospective locations.</p>	<p>We feel that if the aforementioned amendments are implemented there will be sufficient acknowledgement of the links between nature recovery and heritage assets. Setting an appropriate methodology for consideration of historic environment opportunities and constraints for site-level initiatives is beyond the scope of LNRS.</p>	None



Comment ID	Comment	Considerations	Action
427	To what extent is the historic environment affected, both positively and negatively, by habitat creation proposals?	The extent and significance of interaction between habitat creation projects and the historic environment would be determined on a case-by-case and scheme-by-scheme basis and is beyond the legal scope of LNRS to evaluate.	None
428	How, if at all, have recent and ongoing BNG or similar projects considered the historic environment in developing habitat enhancing land management plans?	The extent and significance of interaction between habitat creation projects and the historic environment would be determined on a case-by-case and scheme-by-scheme basis and is beyond the legal scope of LNRS to evaluate.	None
429	<p>Are there any conflicts between the Strategy’s proposals for nature recovery or enhancement and the historic environment? For example, proposals:</p> <ul style="list-style-type: none"> a. within designated areas that would impact on significance, such as nature recovery or habitat creation that does not sufficiently take heritage impacts into account, including historic character and setting; b. for nature recovery projects that include afforestation on ‘open’ landscapes, which could interrupt the relationships and inter-visibility between heritage assets; c. that would alter the condition of soils, or the water environment may impact on below ground archaeology; or, d. to change land management practices which could affect the character of historic landscapes. 	<p>No specific examples of proposals set out in the Draft LNRS which would be in obvious conflict with a heritage or landscape asset were identified during the preparation of the Draft Local Habitat Map by the Specialist Task and Finish Groups and Project Steering Group. Additionally, no specific conflicting proposals or specific sites have been highlighted to the Responsible Authority during the Public Consultation of the Draft LNRS. Nevertheless, due to the strategic-level and technical nature of the LNRS, and the often cryptic nature of below-ground historical assets, there remains opportunities for subsequent site-level schemes to be brought forward which are aligned with objectives of the LNRS but which might be designed in a manner causing adverse impacts on heritage assets and the historic environment. The LNRS will highlight the requirement for site-level projects to make careful consideration of site-level constraints and opportunities including of the historic environment and the StoryMaps supporting each LNRS Potential Measure can provide further supporting detail aiding this process.</p>	<p>Amend wording of LNRS ‘caveat’ to better reflect historic environment and heritage.</p> <p>Include additional text in Local Habitat Map and StoryMaps advising consideration of historic environment constraints and opportunities before undertaking any works.</p>



Comment ID	Comment	Considerations	Action
430	<p>Are there opportunities for biodiversity enhancements that would benefit both the natural and historic environments that should be included in the Strategy? For example:</p> <ul style="list-style-type: none"> a. restoring historic hedgerows; b. restoring priority habitats that support both nature recovery and historic character of particular landscapes e.g. wood pasture and parkland, traditional orchards, open water, meadows etc; c. changes to land management practices that protect archaeological features, such as the reversion of arable land to meadow or pasture where appropriate; d. measures that improve the water quality of historic lakes, ponds, and canals, or that restore historic water management features; e. improving public access and interpretation of both natural and historic features; f. restoring historic structures or landscape features that could also support wildlife, e.g. icehouses, follies, etc. 	<p>We feel there are significant opportunities and co-benefits in the conservation of the natural and historic environment. Potential Measures prioritise the restoration of wood pasture and parkland (PM19), traditional orchards (PM26), ponds (PM7), species-rich grasslands (PMs 3/29/30/31), and hedgerows (PMs 16 and 17).</p> <p>With regards improving public access and interpretation of both natural and historic environment: Worcestershire’s LNRS aims to support health and wellbeing co-benefits through nature recovery initiatives by focusing on good Green Infrastructure and contributing to the national standards for accessible greenspace as contributors to nature’s recovery within the built environment. In this context, Biodiversity Priorities 39 and 40 promote place-shaping to be richer in nature with greater extents of connected, accessible greenspace within them. Additionally, Supporting Activity 18: Mitigate impacts of visitor pressure on sensitive sites, includes activities including “creating suitable alternative natural green space destinations for public outdoor informal recreation and activity”.</p>	<p>Amend title and wording of PM16 to better promote conservation of historic hedgerows.</p> <p>Add reference to PM61 to ensure any restoration initiatives for historic assets such as caves, follies and ice houses are sympathetic to nature such as roosting and hibernating bats.</p> <p>Include additional text in Local Habitat Map and StoryMaps advising consideration of historic environment constraints and opportunities before undertaking any works.</p>
431	<p>The Strategy should set out how landowners and land managers can best look after known and unknown historic environment features and the wider historic landscape on Biodiversity Net Gain offsite settings.</p>	<p>Such advice would be site-specific and beyond the legal scope of LNRS to provide. However, additional signposting will be included in relevant LNPS PM StoryMaps to direct land managers to Historic Environment good practice guidance ‘nature recovery and the historic environment’.</p>	None



Comment ID	Comment	Considerations	Action
432	<p>The draft LNRS identifies Irreplaceable Habitats as included in Schedules 1 and 2 of the Biodiversity Gain Requirements (the BNG Requirements). It continues to state that ‘habitats considered irreplaceable and which are found within Worcestershire are ancient woodland, ancient trees and veteran trees, and lowland fen’. This list does not include wood pasture and parkland, nor do the BNG Requirements. Where it relates to the landholdings, the specifics of the APIB designation refer to ‘irreplaceable’ wood pasture and parkland at grid reference SO 77862 44577 (polygon highlighted in blue above). Whilst it is acknowledged that wood pasture and parkland is a Priority Habitat, and the component veteran/ancient trees are ‘irreplaceable’, wood pasture and parkland itself is not ‘irreplaceable’ under any definition (i.e. BNG requirements or National Planning Policy Framework [NPPF] definition).</p> <p>Priority Habitats are not listed as a component part of the APIB. The ecology note submitted with our response does not explicitly identify wood pasture and parkland in this area, but identifies its component parts (i.e. veteran trees/grassland). Whilst it is acknowledged that this parcel is identified in the Defra Priority Habitat Inventory database as wood pasture and parkland, given that priority habitats are not identified as a component part of the APIB and it is not identified as ‘irreplaceable’, the APIB designation where it relates to this habitat type in the polygon shown above should be removed.</p>	<p>The omission of wood pasture and parkland from the Irreplaceable Habitats list within the draft LNRS on page 28 was an error and this has been rectified.</p> <p>Wood pastures identified as ancient and historic parkland are defined as forms of ancient woodland in Government’s Standing Advice, which is a material consideration in the planning process, and are therefore Irreplaceable Habitat under the umbrella definition of ancient woodland.</p> <p>https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#ancient-woodland</p>	None
433	<p>Strategy PM20 covers the wood pasture/parkland across the southern area of the site, and reads, “Create new wood pasture and parkland habitat and manage using a conservation grazing system to buffer and link up species-rich grassland, scrub and veteran tree habitat”. There appears to be a contradiction in the LNRS in that the APIB map identifies existing wood pasture and parkland, but strategy PM19 (enhance wood pasture and parkland) does not cover the land, which should be apparent if it is also identified as such in the APIB designation (see earlier comments regarding APIB classification). It would therefore be apparent that PM19 rather than PM20 is more appropriate in this location.</p>		Discrepancies within PM19 and PM20 mapping resolved.



Comment ID	Comment	Considerations	Action
434	<p>We act on behalf of *redacted text*, who have a longstanding ownership of a large area of land to the south of Kidderminster and have instructed *redacted text* to submit representations to the above consultation. The landownership is illustrated (for identification purposes) below, with a key [map provided]. The land in the red line is well situated for future development. Excepting the SSSI, development surrounds three sides of the site (albeit on one side divided by the SSSI) and as such it would make a logical urban extension to Kidderminster if needed in the future, and could accommodate either commercial or residential development in principle, given the mixed range of uses prevailing in the area. Further, a significant portion of the site has previously been used in relation to the operation of a sugar beet factory (no longer in existence) and as such is previously developed. It is recognised that – evidently – impact on the SSSI and ecology generally, as well as biodiversity net gain, would need to be addressed in any planning application. However, this can only be credibly investigated at the appropriate juncture and should not be pre-empted at this stage in the LNRS. The land within the red line is identified in the LNRS as being part of “Areas that Could Become of Particular Importance for Biodiversity”. Such a designation affects almost the entire built-up area of Kidderminster, regardless of the density and form of existing development within the settlement. As such, as a point of principle, the designation is flawed and such a general identification of land cannot represent an area of “particular importance” for biodiversity. *redacted text* objects to this and the designation should be removed in relation to the red line area. Although the motivation behind identifying the land in this manner is understood, and *redacted text* strongly support the principle of nature recovery, there is little reasonable prospect of any improvement taking place outside of the context of the site’s development (which would need to consider these matters in any event). However, the designations themselves run the risk of precluding development if the site is identified only for nature improvement. These designations should be removed as they are counterproductive to the overall aim of nature recovery.</p>	<p>The land is adjacent to a Site of Special Scientific Interest and designated in the relevant Local Plan as Green Belt. Site appears to have existing nature conservation value and opportunities for enhancement. Request conflicts with responses from other stakeholders who suggest site should be covered by mapped Potential Measures. Error in WHI mapping on this site identified.</p>	<p>PM29 mapping reduced. PM63 mapping re-located. PM20 mapping removed. WHI mapping to be corrected.</p>



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