



Response to the East Sussex and Brighton & Hove LNRS consultation

Draft report produced by the Sussex Nature Recovery team
May 2026



Funded by
UK Government



Contents:

	Page No.
<u>Exec Summary</u>	4
Overview of consultation responses	
i. About the LNRS and the consultation	7
ii. Positive comments and endorsement	10
iii. Feedback from the survey	13
iv. Feedback from emails/letters	22
v. Feedback from pins added to the Local Habitat Map	26
Our response to key feedback themes	
a. Format and structure	
1. Document length	27
2. Language	28
3. Imagery	28
4. Local Habitat Map usability	29
b. Description, pressures, principles, habitat priorities and measures	
1. Marine habitats and species	30
2. Farmland description/farming with nature case studies	30
3. Low Weald description	31
4. Wooded heath and Friston Forest description	32
5. Lowland heath description	33
6. Deer pressure in wetlands and important grazing marshes	34
7. Irreplaceable habitats	34
8. Ecosystem services and benefits table	35
9. Invasive species list	35
10. Light pollution	35
11. Bio-beads and other microplastics	36
12. Water quality and flooding	37
13. Scale and accumulation of pressures	38
14. National Trails and related initiatives	38
15. Has the LNRS considered the historic environment?	39
16. Role of community groups, volunteers and parish councils	39
17. Hastings references	40
18. How does the LNRS address public access to nature?	40
19. Rights or Rivers, Nature and Personhood	40
20. Data and Evidence	41
21. Principle 1	41
22. Principle 2	42
23. Principle 3	43
24. Principle 6	43
25. Principle 7	44

26. Priorities & Measures	44
27. Enabling measures	45
28. Coastal habitats priority & measures (ex marine covered in B1)	46
29. Farmland priorities & measures	47
30. Soil health priority and measures	48
31. Species-rich grassland priorities and measures	49
32. Woodland priorities and measures	49
33. Hedgerow and Scrub priorities and measures	50
34. Rivers and streams priorities and measures	51
35. Aquifer priorities and measures	51
36. Standing waterbodies priorities and measures	52
37. Urban priorities and measures	52
38. Swift bricks and artificial nest cups	53
39. Nature networks priorities and measures	53
40. Nature and health priorities and measures	54
	55
c. Local Habitat Map	
1. Level of detail	56
2. Accuracy of mapping	57
3. Buffers	57
4. Number of measures mapped	58
5. Mapping in urban areas	59
6. Access to datasets/layers	59
7. Are unmapped areas at greater risk of development?	60
8. Request for sites to be added or removed from the map	61
d. Priority Species list and species measures	
1. Priority Species list development	62
2. Priority Species list format	63
3. Requests to add species to the Priority Species list	64
4. Requests to remove species from the Priority Species list	66
5. Amphibians and reptiles	67
6. Fish	68
7. Changes to Species measures	68
8. Plant species, seed collection and propagation	68
9. Pressures on species: INNS control and predators	69
10. Role of local recorders	69
11. Species reintroductions	70
12. Wildlife rescue and rehabilitation organisations	70
See also Marine species (B1) and Swifts bricks (B38)	
e. Delivery and implementation	
1. Funding	71
2. Monitoring	72
3. Implementation	72
4. Enforcement powers ('teeth')	73
5. Responsibility for delivery	74
6. Relationship to existing plans	75
7. Will the LNRS make a difference?	76
8. What will happen to the LNRS as a result of devolution?	76
9. Ongoing engagement and additional materials	77

Executive Summary

This report outlines key findings, responses and actions arising from a statutory consultation on the draft **East Sussex and Brighton & Hove Local Nature Recovery Strategy (LNRS)** which ran for 6 weeks from 15th October to 26th November 2025.

Public consultation is a key step in the preparation of a LNRS and is required before publication. Any resulting changes to the draft documents and Local Habitat Map are also subject to approval by LNRS Supporting Authorities via a 28-day statutory review.

About the consultation:

- **517 responses were received** from 179 surveys, 125 emails/letters, and 213 map pins. Note that as surveys and emails provided multiple pieces of feedback, the number of individual comments received is many times greater. In addition, relevant themes raised through the West Sussex LNRS consultation were reviewed to help ensure a consistent Sussex-wide approach where appropriate.
- **Public feedback across all channels is strongly supportive of the draft LNRS.** The strategy is seen as a comprehensive and practical framework for nature recovery, that is useful, clear, well-structured, joined-up, and ambitious. A sample of [positive comments and endorsements](#) have been captured in this document.
- **85% of survey respondents agreed that the LNRS gave them a better understanding of what we have to do to help nature** in East Sussex and Brighton and Hove. Nearly 70% of those involved in nature's recovery felt that the strategy could help support funding, collaboration or the delivery of recovery projects.
- **Organisations and groups across all sectors expressed their intention to collaborate and support the East Sussex and Brighton & Hove LNRS** in its delivery phase. They also provided examples of projects that are already delivering or have the potential to deliver LNRS measures.

Overarching response themes and actions

Below are the common and overarching themes of feedback received through consultation. These and many others have been addressed in more detail in this report.

Note: For brevity, many further comments reviewed and addressed by the LNRS team have not been included in this report. They include typographical errors, additions to the glossary, recommendations for links to further resources or case studies, minor wording changes that don't affect the overall meaning, and some out of scope queries.

- **Length and complexity in navigating LNRS documents and map.** Respondents reported difficulty engaging with the strategy due to its length and format, with strong calls for a concise summary. The Local Habitat Map was also challenging for some users. While

guidance limits the scope for shortening the strategy, the team are keen to develop more accessible formats post-publication.

- **Inclusion of marine habitats and species.** The statutory scope of the LNRS stops at mean low water (MLW) which excludes the marine environment. A new Principle, however, is being added to highlight the impacts of upstream activities on marine and intertidal habitats, and a Sussex seascape recovery strategy (the '[Blueprint](#)') is being developed separately by key partners which can act as a voluntary marine extension.
- **Greater emphasis and mitigation on the pressures on nature.** Respondents shared their concerns which were greatest for light pollution, development and water quality including a focus on bio-beads. The LNRS cannot address the sources of these pressures, but wording is being added to emphasise their impact within the strategy.
- **Highlight the role of data and evidence.** Additional wording is being added to emphasise the role of data to underpin all decision-making, and to encourage everyone with an interest to improve our local evidence base by submitting habitats and species records.
- **How the Local Habitat Map was developed.** Key queries included why certain datasets had not been used, discrepancies between the map and observations on the ground, and the number of mapped measures. These were all limited by the reliability of available datasets and criteria in the statutory guidance. Inaccuracies have been noted.
- **Changes to the Local Habitat Map.** Landowners, land managers, and interested parties provided information about sites they felt should be added or amended in the map. These were considered on a case-by-case basis. Requests included changes to buffers and removal of some measures from SSSIs by Natural England.
- **How the Priority Species list was developed and additions to it.** Many respondents queried why an important or threatened species wasn't prioritised (often because they can be supported by habitat measures). Several longlisted species, such as adder and pearl-bordered fritillary, will now be prioritised following provision of new information by responders.
- **More clarity on funding, monitoring and implementation, and scepticism about its ability to drive change.** This report acknowledges these concerns, which will be worked through in the delivery phase. This report also highlights the progress represented by the strategy, the LNRS's new role in planning, and how our strong nature-recovery community in Sussex can be supported and encouraged by it.
- **Ongoing support and materials.** Workshops, bespoke guides and events were suggested to help key users such as landowners and community groups implement the LNRS and will be considered.

Next steps

Immediate actions identified in this report have translated to the draft documents and Local Habitat Map. Following a statutory 28-day review by Sussex Supporting Authorities, and their approval, the East Sussex and Brighton & Hove LNRS will be officially published on the [Sussex Nature Recovery](#) website.

Other actions listed in this report relate to the ‘delivery’ phase of the strategy and will be taken on board once the LNRS is published. These include, for example, clarity around funding, monitoring and implementation, and the development of a more user-friendly version of the LNRS, along with supplementary materials and engagement activities.

For updates on the publication of the East Sussex and Brighton & Hove LNRS, and its subsequent delivery phase, [sign up to the Sussex Nature Recovery newsletter](#).

Overview of consultation responses

i. About the LNRS and the consultation

Established under the Environment Act 2021, Local Nature Recovery Strategies are a new initiative to drive collaborative action for nature.

In East Sussex, the LNRS provides, for the first time:

- a **comprehensive description** and in-depth catalogue of our most important habitats and species;
- a summary of the wider benefits and services nature provides and the main **pressures, threats** and **opportunities**;
- **24 habitat priorities** and **108 detailed measures** (or actions) that can support their recovery, building on seven key principles;
- a **Local Habitat Map** showing where action can be targeted to deliver the greatest benefit (in addition, there are many other actions that can be taken, regardless of location, that will benefit nature).

Who was involved in the development of the LNRS

The draft East Sussex LNRS was developed by East Sussex County Council in collaboration with its sister county council in West Sussex, the [Sussex Nature Partnership](#), all local planning authorities within the strategy area including the South Downs National Park Authority, and Natural England (collectively referred to as the 'Supporting Authorities Group'), and with a Working Group comprising organisations and bodies from key sectors including nature, farming and land management. Support was also provided by an expert Technical Review Panel, the Sussex Biodiversity Record Centre, and the biodiversity recording community.

The draft LNRS was also informed by c.2,000 Sussex residents and organisations via workshops, meetings, surveys, webinars, mapping tools, task & finish groups and other engagement activities undertaken across 2024 and 2025.

A public consultation on the draft LNRS documents and map ran for 6 weeks from 15th October to 26th November 2025, hosted on the [West Sussex Your Voice platform](#).

How the consultation was promoted

A press release, social media campaign and newsletter content were shared by East and West Sussex County Councils, [Sussex Nature Recovery](#) (the online home of Sussex LNRS), members of the Supporting Authority Group and Working Group, and by Sussex-based community groups and forums, including Living Coast, Weald to Waves, CLM, NFU, Sussex Wildlife Trust, Lewes Climate Hub, The Argus, Sussex World, the Brightonian Magazine and others.

Posters advertised the consultation in libraries across East Sussex and Brighton & Hove (where printed copies were available for those without digital access). The consultation was also promoted via posters in bus shelters in Brighton & Hove, on radio and by a 30-minute interview on Latest TV (a local channel covering Brighton, Hove, Worthing and South Chichester) and later on YouTube.

The above activity drove over 5,000 visits to the East Sussex and Brighton & Hove LNRS consultation portal and 2,650 downloads of the LNRS documents.

How responders were supported to complete the consultation

Three hour-long webinars entitled “*What to expect and how to have your say*”, walked different groups (the public, farmers/land managers, town & parish councils) through the consultation documents and map and provided guidance on how to give feedback. Recordings of these webinars were posted to the Sussex Nature Recovery website, shared via its newsletter and uploaded to the consultation hub portal, garnering c.1,000 views.

Two PDF factsheets detailing how to navigate the Local Habitat Map and documents were also made available in the consultation portal, as well as a set of FAQs.

How feedback was invited

Views were captured in one of three ways:

- **Completing an online survey** - this had 36 questions, all voluntary with a mix of multiple choice and free-text answers (printable versions of the survey were also available).
- **Adding pins to the interactive Local Habitat Map** - this enabled comments on a specific location.
- **Email/Letter** sent to the East Sussex County Council LNRS lead.

How many responses were received

517 responses (179 surveys, 125 emails, 213 map pins) were recorded to the East Sussex and Brighton & Hove LNRS. A further 219 responses to the West Sussex LNRS were also reviewed to ensure a consistent Sussex-wide approach where appropriate.

Who responded to the consultation across all channels

In addition to individual responses, the following organisations and groups responded to the consultation. *Table excludes any organisations/groups submitting map pins only.

LNRS Supporting Authority Group and Working Group	Organisations and charities (excluding parish and town councils)
<ul style="list-style-type: none"> - Brighton & Hove City Council - East Sussex Public Health, Healthy Places Team - High Weald National Landscape - Farming and Wildlife Advisory Group – South East - Knepp Wildland Foundation - Lewes & Eastbourne Councils - Living Coast UNESCO Biosphere - National Farmers Union (NFU) - Rother District Council - South Downs National Park - Sussex Wildlife Trust 	<ul style="list-style-type: none"> - Brighton & Hove Food partnership - BASC - Butterfly Conservation - Community People - Conservators of Ashdown Forest - CPRE Sussex - Crown Estate - East Sussex Wildlife Rescue & Ambulance Service - Energise Sussex Coast - Environment Bank - Environmental Investigation Agency - Flag Ecology - Greening Chiddingly CIC

<ul style="list-style-type: none"> - Sussex Biodiversity Record Centre - Weald to Waves - Wealden District Council 	<ul style="list-style-type: none"> - Historic England - Hove Civic Society - Kent & Sussex Railway - Marine Management Organisation - Nature Impact Ltd - Nattergal - National Trails UK - Plumpton College - RSPB - South East Rivers Trust - Southwood Foundation - Southern Water - Sussex Local Wildlife Site Initiative - Sport England - Strandliners - Sussex Ornithological Society - Woodlands Trust
Parish & town councils	Community Groups
<ul style="list-style-type: none"> - Barcombe Parish Council - Battle Town Council - Burwash Parish Council - Hamsey Parish Council - Kingston Parish Council - Loughton Parish Council - Lewes Town Council - Peacehaven Town Council - Ringmer Parish Council - Rotherfield Parish Council - Salehurst & Robertsbridge Parish Council - Southease Parish Council - Telscombe Town Council - Uckfield Town Council - Warbleton Parish Council - Withyham Parish Council 	<ul style="list-style-type: none"> - Bexhill Friends of the Down - Brighton & Hove Organic Gardening Group - Crowhurst Environment Group - Friends of Combe Valley - Friends of Ditchling - Friends of Hastings County Park - Friends of Polegate Jubilee Nature Reserve - Friends of Rye Harbour Nature Reserve - Hastings Voluntary Action - Hastings & Rother Swift Group - Kingston Nature Recovery Group - Newhaven Heights Nature Reserve - Round Hill Society - St Helens Park Preservation Society - Standing up for Nature Hastings & Rother - Swifts Local Network - Sussex Amphibian & Reptile Group - The Wildflower Conservation Society - Wild About Burwash - Wiltshire Swift Group

ii. Positive comments and endorsements

Whilst this report is primarily concerned with sharing and responding to comments related to improving the East Sussex and Brighton & Hove LNRS, the consultation also elicited many positive comments. The below are a selection of these and were received across all response channels.

- *“The RSPB welcomes the East Sussex & Brighton & Hove LNRS and finds it to be a **well-structured and ambitious strategy**.”*
- *“**Really useful tool** to understand how connected nature and the measures we need to put in place to protect and restore it are. Really helpful to have this level of detail about our local wider area. I will use it a lot in my job (architect) as well as for personal interest.”*
- *“This gives me hope for nature, laid out in a way that clearly shows **how and where**.”*
- *“It’s a **means to engaging with people**; to encourage them to help in nature recovery”*
- *“It provides **clear guidance** as to how organisations of different scale as well as individuals can play a part in nature recovery.”*
- *“**Good** effort and hope it makes things change.”*
- *“A LNRS should be a strong, action-led tool with a decent chance of making a substantial difference to future generations; **this comprehensive strategy** is an excellent start, the 'acid test' will be (as always) in its implementation...”*
- *“As an archaeologist, I am very aware of the importance of protecting and supporting our natural environment. I think it’s a really **positive** thing that East Sussex are being proactive.”*
- *“I have worried about species and habitat loss all my life and am excited to see **solid plans** to improve the situation.”*
- *“I am pleased with the **proposed actions** in train.”*
- *“I think the work behind this is **wonderful**... and the work groups are doing is wonderful”*
- *“This should enable a better **strategic approach** to nature recovery, and one that is localised to enable and promote local action.”*
- *“A very **good overview, a call to action, management-focussed**, etc.... But a good **baseline** to hold all to account - no excuses now on the knowledge front”*
- *“It is an opportunity for a **joined up understanding** of how to support nature recovery.”*
- *“There seems, at last, a **real focus** on what we have to do to try and protect nature.”*
- *“It is heartening to read through the documents, much food for thought and ideas for involvement.”*
- *“Makes me hopeful that with a **clear strategy** that's supported by like minded people the tide might begin to turn in nature's favour on a wider front.”*
- *“Anything that has a **strategic view** to our environment and nature has to be good.”*
- *“The LNRS brings together a **wealth of information and ideas** that can help support nature recovery across the region.”*
- *“It provides a **clear baseline** of important habitats and species in Sussex and the pressures they face. It should provide a **framework** to guide joined-up and ambitious nature recovery here, and I look forward to it's delivery and ongoing development. Well done to everyone who has put it together!”*
- *“It is important to take a **strategic and long-term view** of nature conservation issues based on sound data.”*
- *“I really **support this work** and am interested to see what's next and how it influences delivery.”*
- *“I think you are doing a good and very worthwhile job. I wish I had time to help.”*

- “The LNRS has brought to the Parish Council's attention not only the challenges faced by nature but also helpful **ideas** for local nature recovery strategies at a variety of scales, and for **partnering** with other stakeholders on the future.”
- “A more **strategic approach** could unlock support for funding and allow partners from different sectors to connect with a **shared framework**.”
- “This is the most **comprehensive strategy** I have seen and gives hope that it will be actioned.”
- “We are interested because the LNRS provides a **clear and structured framework** that reflects many of the priorities we have been working towards at parish scale. It helps place our woodland, hedgerow, wetland and river projects within a wider county context and shows how community-led delivery can contribute to nature recovery.”
- “It's great to see **everything brought together** in one place and the good work that is already being done. It's important to have a **benchmark** as so many species are in extreme decline and anything we can do to encourage everyone to take responsibility for nature recovery, from policy makers to individuals is important.”
- “I am excited because the LNRS for East Sussex and Brighton & Hove provides a **shared understanding, vision and plan** of how and where to concentrate efforts in taking action for nature recovery, increased wildlife biodiversity, better development planning, climate change mitigation and improved health and well-being for our communities.”
- “I think this is very thorough and **sets out sensible and clear steps** to achieve these priorities and measures.”
- “Well done on all of your hard work!”
- “We are excited to support and use this **living document**.”
- “I think this **an amazing document** and so much hard work has gone into it. I really hope it can lead the way to support our valuable wildlife. After reading through it I feel much clearer as to what we have to lose and only hope our voices will get so loud government and local councils will have to hear. Thank you to everyone and their expertise mentioned at the end of the document.”
- “It is a very **impressive piece of work**, and I have no doubt will be important in the work within Combe Valley Countryside Park”
- “The LNRS sets out **an inspiring and coherent vision** for how trees and woodland can be protected, restored and reconnected as part of wider landscape scale nature recovery across East Sussex.”
- “I think it is a real opportunity for landscape scale nature recovery, which looks at the issues we are facing in a **holistic** manner.”
- “In the words of Robert Mcfarlane, “Despair is a luxury, hope is a discipline”! There is so much to be done and this is a very **useful body of work** which should help to move us forward in restoring the nature which we have recklessly destroyed.”
- “Nature needs as much help as we can give and it is very encouraging that you are working so hard to achieve this.”
- “The LNRS closely aligns with the College's own objectives and educational focus. Alongside this, the LNRS provides **a means of tracking progress and ensuring that action is being taken** to tackle the biodiversity and climate crisis, at a local scale.”
- “I try and engage locally and this **project** will help us focus and track changes.”
- “Thank you again for all the **brilliant work** that has gone into the draft LNRS. We are truly encouraged by its **ambition**, and we look forward to working collaboratively to deliver nature recovery in Sussex.”
- “Because it is **evidence of local action** to improve nature recovery and engage the local community with how things can be improved and how essential nature is to humans.”

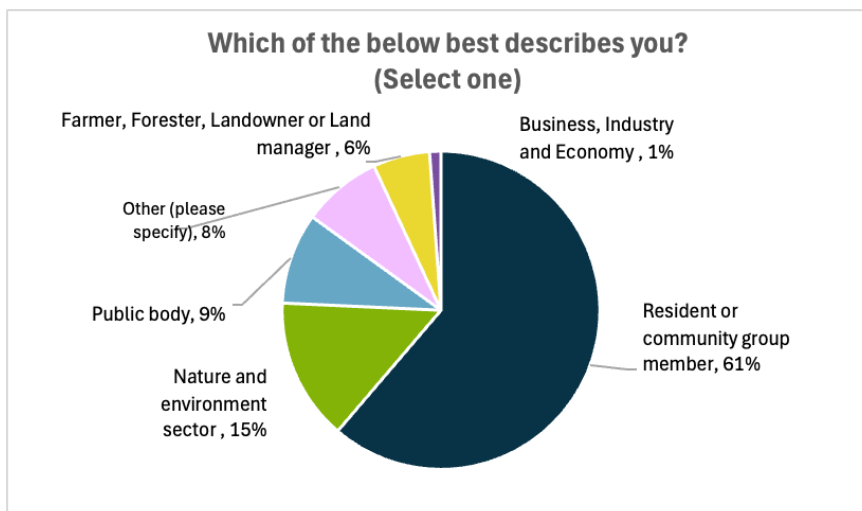
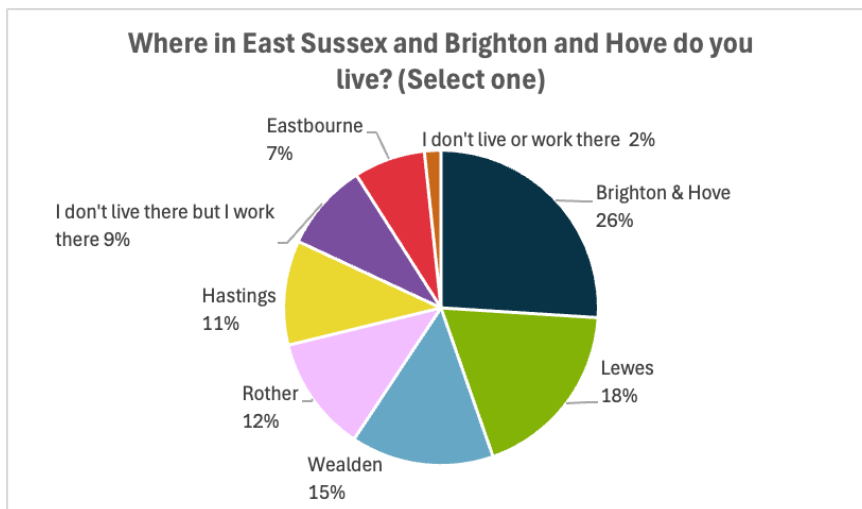
- “I am excited because the LNRS for East Sussex and Brighton & Hove provides a **shared understanding**, I would like to see acknowledgement and correlation of both potentially measurable health benefits and economic savings to residents over time as a result of increasing nature biodiversity and mitigating effects of climate change.”
- “This is a **comprehensive and well-considered document** that provides a strong foundation for nature recovery across East Sussex and Brighton & Hove. The collaborative tone and focus on practical, place-based actions are commendable.”
- “This is an **incredible achievement**, and I can only imagine the amount of work that has gone into it.”
- “Congratulations on launching the public consultation for your Local Nature Recovery Strategy (LNRS). We recognise the huge amount of effort that has gone into gathering the baseline data and local knowledge needed to identify the priority species and habitats to include in the LNRS, the areas of particular importance for biodiversity, and the measures that can help enable nature’s recovery. “
- “I’ve been through the consultation documents on the Sussex LNRS – and there is loads of great stuff in there. Overall we fully support and endorse the formation of the LNRS, and acknowledge the **importance of this framework for bringing together regional nature recovery approaches** across our region.”
- “Overall, **we are very supportive of the aims and principles of the draft LNRS**, particularly the emphasis on habitat connectivity, nature within everyday life, and the creation of joined-up ecological networks across communities. We also welcome the extensive work already undertaken to involve local residents and organisations.”
- “Thanks so much for all your work on these strategies. The products are **impressive.**”
- “**The LNRS is a very impressive resource.** It is a document that comprehensively draws together East Sussex’s habitats, important species and landscape character areas through a set of measures that link to policy in a way that nature can be systematically improved. In this way the LNRS presents a real vision and programme for the improvement of nature within East Sussex.”
- “This will be the **first time we have a county wide framework and vision for nature recovery at scale**, which can streamline conservation efforts and increase efficiencies. The framework itself has accounted for and incorporated important values making use of an expanding on existing theories such as the Lawton principles and the importance of natural processes on maintaining healthy environments.”
- “We commend the authors of the consultation document on the **excellent analysis** in Part 1 about the state of nature in our county.”
- “Part 1 Section 4 is valuable because it **provides a consistent baseline** and understanding of the pressures we are facing. It’s a reliable reference with sufficient detail.”
- “It’s **great to see so many ACIBs on the map!** I hope this ambitious strategy can be put into practice without delay. I look forward to witnessing the benefits. Thank you for your hard work. Please keep it up!”

iii. Feedback from the survey

179 submissions of the survey were received in the East Sussex and Brighton & Hove consultation.

Who responded

Responses were received from all five districts and boroughs in East Sussex as well as from the city of Brighton & Hove. 9% of responders don't live in East Sussex and Brighton & Hove but work there, such as those involved in environmental or land management initiatives in the LNRS area. Similarly, a smaller percentage don't live or work in the strategy area and are responding on behalf of national organisations.



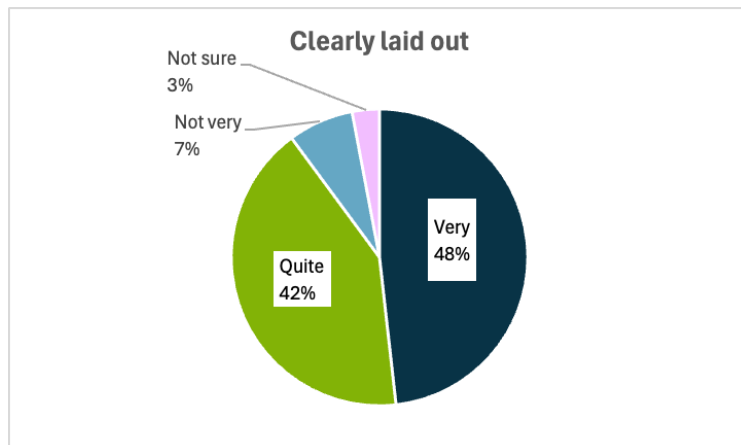
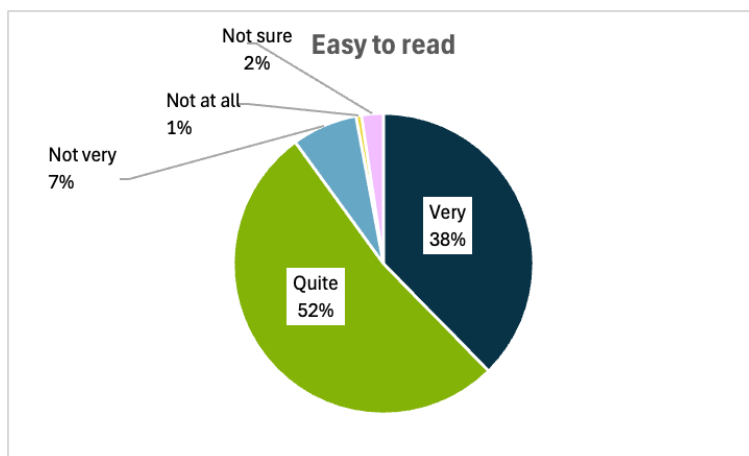
- **28%** (51) of those who responded did so on behalf of an organisation, business or group including Woodland Trust, South East Rivers Trust, Brighton & Hove City Council, Sussex Wildlife Trust, CPRE Sussex, Weald to Waves, Brighton & Hove Food Partnership, The Sussex Local Wildlife Sites Initiative, Sussex Amphibian and Reptile Group, National Highways, Sport England, Plumpton College and others.

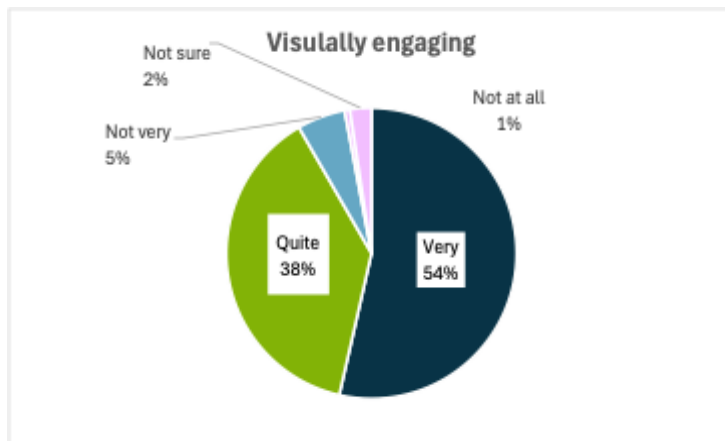
Awareness of the LNRS

- **61%** had heard about the strategy before public consultation, 3% weren't sure and 36% had not.
- **77%** felt they have a good understanding of the purpose of Local Nature Recovery Strategies, 17% weren't sure and 6% do not.
- **51%** had participated in the development of the LNRS for East Sussex and Brighton & Hove in some way before the consultation by for example, watching a webinar, taking a survey, visiting the website, receiving a newsletter and so on.

Format and legibility

How easy to read, clearly laid out and visually engaging respondents found LNRS documents and interactive Local Habitat Map.





90% of responders found the LNRS to be *quite* or *very* easy to read, clearly laid out and visually engaging, but when asked what could be done to improve the format of the strategy, a large amount of feedback concerned its length and complexity which many respondents found prohibitive and overwhelming, Many responders suggested a summary could help people navigate and digest information.

Sample of verbatim comments related to improvements to format and legibility

- “Its an **overwhelmingly large** set of documents for any lay person to get to grips with.”
- “There's **a lot of information** to take in and as much as I feel strongly about improving Biodiversity and green spaces. I haven't got the time to digest this properly.”
- “**Too long**, overwhelming and complicated!”
- “Use **simpler language**”
- “It was a very interesting read and very informative. However I have a background in this sort of work and continue to volunteer in the field. For those without my background it may appear **overlong and difficult to digest** however.”
- “My only feedback is that the document **isn't so easy to read on a mobile device**, which a lot of our charity volunteers and visitors have as their only digital device”
- “Add an **executive summary** as the documents are very lengthy”
- “I didn't know about it and now do! Good to get **summaries** out to people as far too much to read!”
- “Informative, useful layers and very valuable map.”
- “Local Habitat Map for our own area is really difficult to see - **insufficient detail.**”
- “We found the **mapping quite hard to access** as we are mostly non professionals and needed a lot of peer support to get going. This put lots of people off contributing, which is a shame. People found it **confusing** and weren't really sure if they were responding to the contents of the maps or the process and website as a whole, or both?”

Feedback on key components of the draft LNRS

Description (found in [Part 1](#) of the LNRS) and principles (found in [Part 2](#))

- **64%** felt the **Description** effectively set the scene for Sussex's current land use, condition of its natural environment and the pressures it faces. **26%** felt it partially did so. **6%** weren't sure. **2%** said No.

- **77%** felt the seven **Principles** helped them understand the issues impacting nature in Sussex and how we might respond to them. 17% felt they partially did so. 4% weren't sure and 4% said No.

When we asked what could be improved, responders were concerned by the lack of marine habitats and species in the strategy. The impact of light and bio-bead pollution were also key themes.

Sample of verbatim comments about improvements to the Description and Principles:

- *“**No Marine environments** are excluded when rivers and the marine environment are closely interlinked. This is significant when there is pollution.”*
- *“The scene is very effectively set for East Sussex & Brighton - and different wooded habitats are well described. I would however [recommend?] looking at referencing **wooded heath** as especially in high weald this is a subset of wood pasture that's prevalent.”*
- *“Page 74 we would argue that both 'Rivers, Streams & Aquifers', and 'Wetland and Standing Water Bodies' **do support pollination** when you consider the flowering plants and riparian areas and breeding grounds that these areas can support.”*
- *“Part 1 fails to acknowledge persistent industrial pollution from **bio-beads**. It must acknowledge bio-bead contamination as a pressure”*
- *“Should **Chalk Streams** be included in the table of irreplaceable habitats?”*
- *“There is no mention of impact of **light pollution** and its harm for the current wildlife and flora”*
- *“**Principle 7** should move higher up - bringing Nature into everyday life to help everyone understand the issues impacting nature.”*
- *“Much of our urban greenspace is maintained purely by **volunteers**. The LNRS needs to acknowledge and promote investment in this invaluable work.”*
- *“Part 1 Section 5.2 - Our building blocks for large-scale nature recovery. This needs a block for **data and evidence**, as this should underpin all decision making.”*

Priorities and Measures (found in [Part 2 of the draft LNRS](#)) (measures are the actions that can be taken to deliver the priorities)

- **59%** felt the 24 **Priorities** captured everything they feel strongly about, 27% felt they partially did so. 8% weren't sure. 6% said No.
- **67%** felt the 106+ **Measures** were generally written in a way that feels practical and easy to follow for those who might want to implement them. 23% felt they partially did so. 7% weren't sure. 3% said No.

When we asked what could be improved, responders endorsed, queried or refined the wording of specific measures.

Sample of verbatim comments related to improvements to the Priorities and Measures

- *“Some would benefit from a **clearer indication of who will be likely implement them**. A distinction between those suited to professional delivery and those accessible to communities or individual landowners would improve usability.”*

- **“Funding remains a major constraint** for councils and landowners. The document might benefit from referencing potential funding routes — such as ELMS, Biodiversity Net Gain, water company investment, and developer contributions (Section 106 or CIL).”
- “C1 Measures should include inshore **Marine Conservation Zone** habitats such as chalk reefs. Measures should include reviewing dredging and dumping of sediments on reefs.”
- “FL1 - **Enforce existing hedgerow protections** - no mention of this at all in Farming measures, and it clearly hasn't been done effectively over past decade or so”
- “W1.2 - W1.6 Bringing woodland, including ghyll woodland and traditional orchards, parkland and wet woodland, into good ecological condition is rightly a core aim of the LNRS. Only 9% of UK woodland is currently in good condition.”
- “W1.1 **Deer Management** (landscape scale). Undertake landscape scale deer management with targeted humane culling to reduce the impact of deer on woodland regeneration, recolonisation and quality of woodland habitats. Could replace ‘with ecological condition’.”
- “Please **reference school grounds** explicitly – huge potential for increasing biodiversity (along with engagement etc).”
- “Please include important text from NPPG Natural Environment 2025 paragraph 017 to ensure suitable numbers of **swift bricks**, a universal nest brick for a range of small bird species.”

Prioritised species list and their measures ([Part 3 of the draft LNRS](#))

- **59%** agreed that the list of **Prioritised Species** is right. 24% felt it is partially right. 14% weren't sure and 3% said no.
- **55%** agreed the **Species Measures** were right. 24% felt they were partially right. 20% weren't sure and 1% said no.

When we asked how the Priority Species list could be improved, responders suggested species they thought should be added to the list and others to be removed. Some of the information concerning species abundance and location were queried, and suggestions made to some species measures.

Sample of verbatim comments about improvements to Part 3 -Species

- **“Reptiles and amphibians** are largely absent from the priority species listed as benefiting from measures in the farmed landscape, in woodlands and wetlands. These species are equally as in peril as the small mammals or invertebrates listed, and would benefit from being named in this important piece of statutory policy, and from the measures the LNRS seeks to enable.”
- “Include **Pearl bordered Fritillary** alongside Small Pearl - occupy similar niches but at different stages of succession”
- “Conversely, I think that **Glistening Waxcap, Jubilee Waxcap and Golden-gilled Bolete** are all vanishingly rare - they are not species that can be conserved, so shouldn't be on the list.”
- **“European Water Vole** – given critically low Water Vole populations, measures do not reference reintroduction as a key tool here, which would be necessary following necessary habitat restoration/Mink control in order for this species to recover.”
- “Part 3 page 37) **Fen raft spider** – just to check whether Pevensey Levels here means the National Character Area, and so includes Eastbourne? As aware of fen raft spider records from Eastbourne levels area as well.”

- **“Grazing for Chalk grassland species**, generally the measures here are good but would caveat / amend grazing with *"carefully timed and considered grazing taking into account range of species present on each site". Timing , stock type and density is crucial.*”
- **“The Marsh Gentian** which I am involved in monitoring annually is declining. No mention of this plant or any other lowland heath species.”
- **“Water shrews** would seem to be a logical species to include under mammals. They are locally scarce in East Sussex, based on indicative records. They are an indicator species for riparian health, alongside other mammals, such as water voles.”

Local Habitat Map (opens ArcGIS)

- **51%** found the **Local Habitat Map** easy to use and navigate. 31% said partially. 14% said no and 4% weren't sure.
- **53%** agreed that where measures were mapped to land they owned, managed or advised on, this would help support the planning, designing or seeking of funding for nature's recovery. 38% didn't know or weren't sure. 10% said no.

When we asked how the Local Habitat Map could be improved, some responders advised they found the mapping platform difficult to use and navigate. Others were concerned the map lacked detail and queried why some national datasets had not been used to create its layers. Some highlighted discrepancies between what had been mapped and the reality on the ground, while others requested that sites or areas known to them be incorporated into the map.

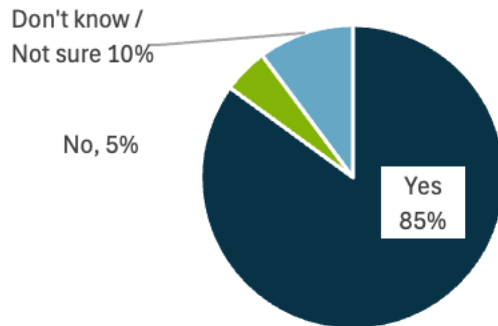
Sample of verbatim comments about improvements to the Local Habitat Map

- *“The problem is in the mapping , there are vast areas which are unmarked as priority and are not protected. All of the undeveloped land must be protected.”*
- *“It would be helpful to know **why areas managed as ACIBs are mapped**; Areas are excluded from the map which should logically be ACIB.”*
- *“Trees outside woodland - should be included in LNRS ACIB maps because 30% of tree cover in England exists outside of National Forest Inventory (NFI) woodland map. Also trees in Woodland Trust Ancient Tree Inventory.”*
- *“Rye Bay area - there are **so many errors and omissions** in the mapping of habitat”.*
- *“Concern about the lack of sites marked as important for biodiversity in the **urban areas**.”*
- *“There appear to be issues around the accuracy of buffered areas”*
- *“Improve navigability and usability of maps through more testing, and functional search facility, e.g via a post code search”*
- *“Maybe using colours that are more contrasting?”*
- *“Buttons to select are unexplained and not intuitive. Areas of ancient woodland in Hastings don't appear to be recorded”*
- *“It may be a problem with my PC which struggles to use the map. However, it would be helpful to know why areas managed as ACIBs are mapped, and I struggle to find that detail.”*

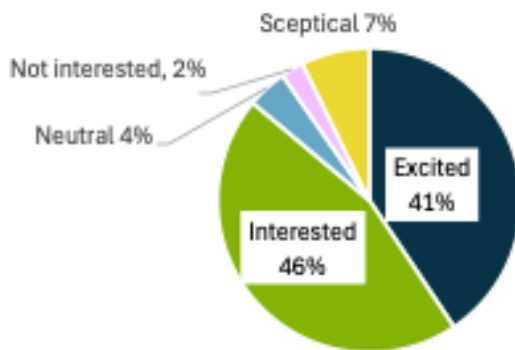
Impact and future use (found in [Part 2 of the draft LNRS](#))

This section asked respondents how they feel about the LNRS, whether they think it can help support nature recovery in practical ways, and what action they will personally take towards its aims.

Does the LNRS provide you with a better understanding of what we have to do to help nature in East Sussex and Brighton and Hove?

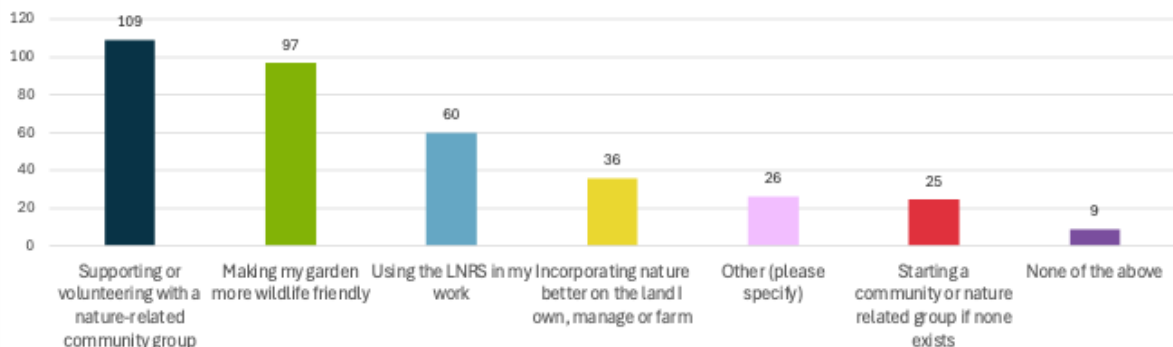


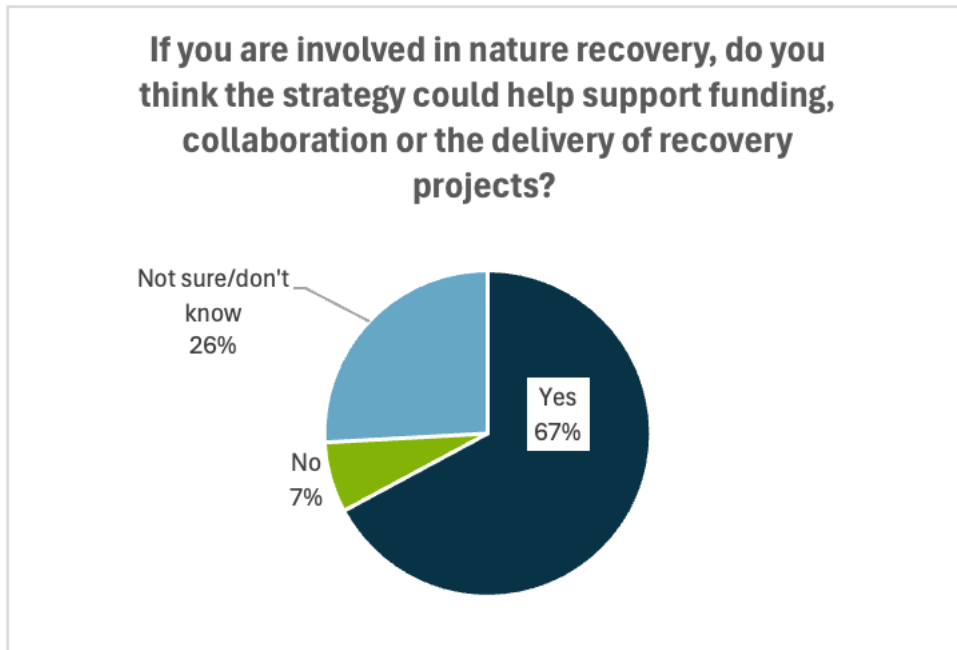
What one word below best describes how you feel about the LNRS for East Sussex and Brighton and Hove?



Overall, survey respondents are excited or interested in the LNRS – just 13% are not interested, neutral or sceptical about it. 85% of responders stated they would take an action forward to help deliver it.

Which of the following actions are you likely to take in making the LNRS happen? (Tick any that apply)





When we asked responders to provide more detail about their answers above, many told us that they found the LNRS ‘comprehensive’, ‘joined-up’, ‘impressive’ and ‘inspiring’ ([read positive comments here](#)). They also requested supporting materials to help imbed the strategy and aid its implementation on the ground, or with specific audiences.

Responders however, also queried the lack of clarity related to funding, resources and monitoring in the strategy and raised concerns about its successful implementation without these in place. Further reasons for scepticism included the lack of political will at the national level and a lack of enforcement powers to curb pressures or compel action.

Sample of verbatim comments concerned about delivery and implementation

- *“Address lack of **funding** and resources to achieve the measures”*
- *“It would be helpful to understand the current and potential future framework for **funding** LNRS measures at scale and the administrative support for such measures within Local Authorities. This is often where projects fall short.”*
- *“There does not seem to be many **actionable steps** within the summary, only slight tips or suggestions about what steps should be taken.”*
- *“Be more precise about **actions** and include **timescales**”*
- *“There is also no information about **monitoring** or governance for the implementation of the LNRS, so how can it be carried out?”*
- *“I am concerned about the loss of habitats from all the housing development that is taking place without any mitigating actions.”*
- *“I'd like to feel optimistic, but the **current government's** rhetoric and policy choices, pitching nature against growth, and 'builders against blockers', give me great concern that the excellent ideas in the LNRS will be very hard to realise in practice.”*
- *“The two 'elephants in the room' for the LNRS that you do not mention are (a) **funding** and (b) **absence of enforcement policy** not only to restore areas already designated, but to maintain them once restored.”*
- *“It's very worthy but I am **sceptical** that it can or will be delivered.”*

- “There is such an infinitely large long way to go to remedy our massive damage this is **just tinkering on the edges**”
- “How will it fare under the planned unitary authority and new mayor? What weight will it carry with decision-makers above?”

Sample of verbatim comments – what would be helpful with the delivery phase

- “Develop **toolkits** for different stakeholders (i.e. business)”
- “**Need starter packs** for local communities to help people set up nature protection and support groups.”
- “Inclusion of **more practical, place-based examples** — such as how public-sector estates (including NHS and community woodland sites) can deliver LNRS measures — would make it more accessible and applied for practitioners.”
- “We hope the strategy will be **promoted powerfully** so that schools, Parish Councils, land owners can get on board.”
- “It is a worthy cause, but I don’t think you will get much public input as it is complicated to use. It might be good to have **local workshops** so that local people can tell you their thoughts and someone can enter the detail for them.”

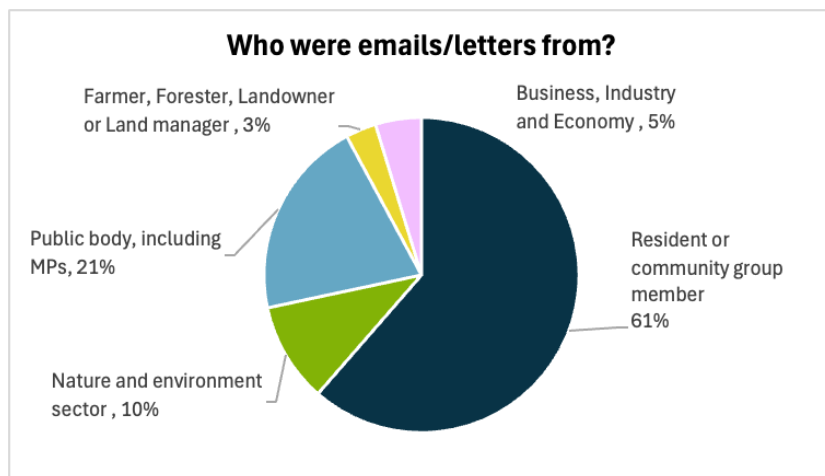
Demographic information

- 51% of survey responders completing demographic questions are female, 46% male and 3% preferred not to say.
- 88% of survey responders completing demographic questions have a white, British ethnicity, 3% were of mixed or multiple ethnic groups, 3% selected Other, and 5% preferred not to say.
- 16% of survey responders completing demographic questions consider they have a mental or physical disability. 5% prefer not to say.

iv. Feedback from emails/letters

127 emails/letters were sent directly to the East Sussex and Brighton & Hove LNRS lead.

Who responded



49% (62) of those who responded did so on behalf of an organisation, business or group including The Crown Estate, Nattergal, Marine Management Organisation (MMO), High Weald National Landscape, South Downs National Landscape, Historic England, BASC, Strandliners, Rother Environmental Group, Greening Chiddingly CIC, Warbleton Parish Council, Kingston Parish Council, Uckfield Parish Council and others.

Key themes from emails/letters.

Correspondence was dominated by two themes (the top two below) which together made up 61% of feedback.

Sandrock Bends

- **46%** of responses related to a specific site in Hastings. This site had been mapped in the LNRS an Area that Could be Important for Biodiversity (ACIB). Correspondence sought to have the area remapped as an Area of Particular Importance for Biodiversity (APIB) despite it not meeting the criteria for this within the statutory guidance.

Bio-beads

- **15%** of responses related to pollution from bio-beads and other sources of pollution from water company infrastructure failings, with the request to add mitigating enabling measures.

Endorsement

- Many responders expressed their support for the strategy. Additionally, some members of the LNRS Working Group and Supporting Authority Group acknowledged the collaborative process in which the strategy had been developed.
 - *"I think the approach has been **very thorough and logical** and the layout of the final documents is **very good**."*
 - *"We are comfortable that our previous thoughts have been taken on board as part of the preparations, and **we confirm our support** for the document."*

- *“I would like to express our **strong support** for the Local Nature Recovery Strategy (LNRS) and the important work being done to restore and protect the county’s natural environment.”*
- *“We’re **incredibly impressed** with what you’ve been able to pull together with such limited resources. We’re hopeful that the Strategies will make a significant difference to nature recovery across Sussex.”*
- *“Given the **highly-collaborative process** in getting to this consultation draft, and the trust and esteem that you and colleagues have built up, I also wonder whether low survey responses reflect a sense that people and organisations feel that they have already had a good say, and really trust that you are taking forward their input in the best possible way.”*
- *“It is such an **achievement** and there is **so much information** in there, big well done!... On the whole it reads really well, the measures are clear and am looking forward to seeing how we can start delivering!”*
- *“Overall, we are **very supportive** of the aims and principles of the draft LNRS, particularly the emphasis on habitat connectivity, nature within everyday life, and the creation of joined-up ecological networks across communities. We also welcome the **extensive work already undertaken to involve local residents and organisations.**”*
- *“Really good to see the measures and mentions for waxcap grasslands, and acid and neutral grasslands”*

Wording changes

- 14% of responses requested changes to wording in the Description, for clarity, to correct typos, or provide additional detail. Examples include updating the status of particular birds, adding references to the importance of the historic environment and links between nature and heritage assets, and suggestions for amending “clunky” outcome statements.

Changes to the map (excluding Sandrock Bends)

- 9% of correspondence shared details about current biodiversity or nature-improvement projects underway at sites in the strategy area, along with requests to add or amend the Local Habitat Map. These came from landowners and land managers including RSPB, as well as from interested parties.
- Some responses queried why particular data sets had not been used in the mapping such as the Priority Habitats Inventory (England) Natural England Open Data Geoportal and Woodland Trust’s Ancient Tree Inventory.

Inaccessibility (length of documents/complexity/map)

- A few responders mentioned the length and technical nature of the strategies as a barrier to engagement.
 - *“When I realised that there were in total 366 pages of information, I am afraid I gave up before I began. Furthermore, my lack of expertise means I don’t feel particularly confident about commenting.”*
 - *“I have **found the map difficult to use** and some of the information is difficult to add.”*
 - *“It perhaps feels like respondents will have to have **read several docs**, and in some cases have fairly specialist knowledge, in order to respond meaningfully? As an organisation, we’ve inputted at various stages along the way, but even I feel somewhat daunted (given our very limited capacity, and lack of specialist wildlife expertise) about responding to the questions”*
 - *The map is great and very easy to use (as long as you are familiar with this sort of thing!)*

Marine

- Several comments related to marine environments. One requested that the strategy reference marine spatial plans and marine licensing requirements, another encouraged emphasis on the interconnectedness between the marine environment and other priority habitats such as rivers.
- A further response was concerned with the lack of reference to marine habitats and species in the strategy.
 - *“ESCC seem to have missed out the marine environment, no mention of the coastal waters out to territorial limits, the ecology of new reefs created, kelp beds created and now conserved.”*

Supporting materials/engagement for parish councils/community groups

- Additional advice, tool kits and events were requested to help those on ground carry out measures in the LNRS.
 - *“Many actions would benefit from clearer scaling for parish councils and small community groups. In particular, we would welcome simple guidance or toolkits for parish-level nature recovery, accessible routes to funding for small-scale habitat projects, clarity on how LNRS priorities will influence planning decisions”*
 - *“We would appreciate future workshops or briefing sessions specifically for parish and community groups. These would help us translate the strategy into practical, local action and ensure we can contribute effectively.”*

Supporting materials/engagement for landowners

- Some comments advised that the farming and landowning community will need bespoke engagement in the delivery phase.
 - *“As both Strategies are large, detailed documents there is concern that farmers and land managers will not have the time/capacity to look through in detail. The delivery phase and coordination of advice and action amongst partners/ stakeholders will be vital if the LNRS are to be used to inform on the ground delivery.”*
 - *“The report is very strong on initially engaging as many partners as possible. It appears to be as intentionally inclusive as possible. However, once the initial engagement has passed it would seem not so many were keen to respond to the survey afterwards. How can this follow up engagement be improved? Could it be that once people e.g. farmers, realise that there is no financial gain to be had if they follow these recommendations and no necessity for them to follow such guidelines as there is no legal enforcement, they no longer have any interest in the strategy?”*
 - *“Support alignment of measures to current ELMS. Wherever possible on publishing, ask that potential funding routes for measures are identified, including ELMS, private finance or water companies. Would make the document more practical.”*

Species

- Several responses concerned particular species and how they were referenced in the strategy. These included (but are not limited to) alerting the team that an image captioned ‘stag beetle’ actually showed a lesser stag beetle, and a request to align wording for swift bricks with NPPG Natural Environment (2025) guidance.

Delivery

- Some responses were sceptical about delivery of the strategy given uncertainties around funding and a lack of ‘teeth’ to enforce change. Others were concerned by a lack of information regarding monitoring.
 - *“Disappointingly, the strategy however seems little more than a plan of actions that need to be taken, but **doesn’t seem to include costs** or conditions required and measures of*

*developing success... The weakness in the report comes later in the next sections as the proposals are suggestions and **not enforceable actions.***

- *“Leaving aside these minor comments, there are issues around how the immense ambition will be delivered and progress measured (there **are no baselines** that I can see, but maybe I've not looked hard enough?). There's also **no strong accountability** as delivery is so diffused and **little is mandatory**”*

Light pollution/dark skies

- One response encouraged measures related to the mitigation of light pollution. Another wanted to map parish-level dark skies initiatives.
- *“The LNRS for the West of England Combined Authority LNRS has included light and noise pollution in their strategy. Their wording could be useful for developing similar measures for the E&W Sussex LNRS”*

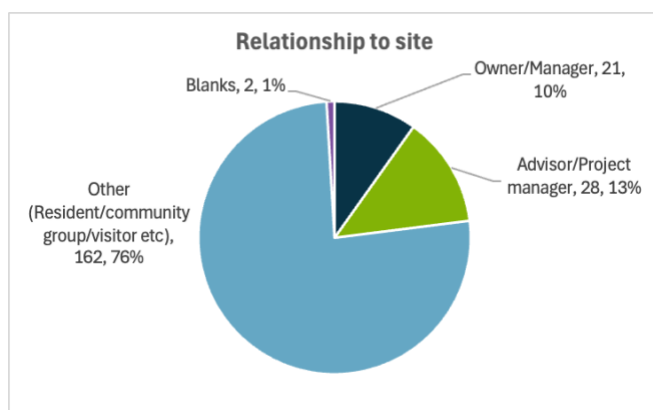
v. Feedback from pins added to the Local Habitat Map

123 pins were added to the East Sussex and Brighton & Hove interactive Local Habitat Map, enabling responders to comment about how a specific site/location had been mapped.

The Local Habitat Map is made up of:

- **APIB ‘Areas of Particular Importance for Biodiversity’ map** – tightly prescribed by the statutory guidance, this covers Protected Sites and irreplaceable habitat.
- **Measures map** - Identifies where LNRS habitat measures can best be implemented to deliver the greatest benefit to biodiversity and/or wider environment, based on stakeholder judgement and best available datasets.
- **ACIB ‘Areas that could become of importance for biodiversity’ map**– all the mapped layers together.

Who responded:



Key themes from map pins

Almost all pins provided information about habitats and species found at the location. Some advised of nature-recovery actions taking place or planned, from habitat corridor projects to “Registered toad crossing” initiatives.

75% of pins requested a site be added to the map while 4% requested a change to how it had been mapped (there were no requests to remove a site from the map). For the remainder, no action was discerned and information has been noted. Each request was considered on a case-by-case basis. In some instances, the responder was asked to provide additional information.

Examples of comments:

- *“Check that the Heathfield Millennium Green is added as a map layer to the LNRS”*
- *“Please ADD this Wet Woodlands stream known as “Alder Carr” as a specific identifier in your habitats and to protect and conserve their hydrological / ecology connections...”*
- *“The gap in Wt1.4 in the floodplain doesn't make sense. It could be continuous.”*
- *“We are creating species-rich grassland in this field. It would be good to include this in your ACIB.”*
- *“Barbastelle bat recorded here and along edge of Boothland Woodland”*
- *“Glow-worms 2025 - please add the area to ACIB, Records were added to iRecord 2025...”*
- *This is not G1.3, it's wetland with reed and rushes, that has potential for management as Wt1.2 or Wt1.4*

Our response and actions to key feedback themes

A: Format and structure

Summary of key feedback	Our response or actions
<p>1. Document length</p> <ul style="list-style-type: none"> • Very long and wordy • Overwhelming / too much to digest • Difficult to navigate • Difficult to read/ access on a mobile device • Need for an Exec Summary or summaries. 	<p>Our response:</p> <ul style="list-style-type: none"> • The draft East Sussex and Brighton & Hove LNRS is comprised of multiple documents, each with between 76-176 pages. We recognise this makes the strategy difficult to read, navigate and digest, especially on mobile devices. • Much of the information in the LNRS is required by the statutory regulations. Additionally, given the lack of an existing ‘State of Nature’ report, the LNRS contains comprehensive analyses and habitat and species summaries never previously compiled for Sussex. While this makes the LNRS a valuable resource and benchmark, it has contributed to its length. • To make the documents less daunting and more accessible, significant effort was placed on design, structure and illustration. The team held hour-long consultation webinars to walk people through the documents; a recording was uploaded to the consultation hub and viewed over 500 times. • For those without digital access, printed copies of the strategy were available during the consultation in key libraries across East Sussex and Brighton & Hove, with librarians briefed to provide support. • The amount of information required by the guidance means there is less scope to reduce the detail or amend the format for publication, but the team is committed to developing a more user-friendly and interactive version of the strategy after its publication and within the subsequent delivery phase of the LNRS. <p>Actions:</p> <ul style="list-style-type: none"> • Include an Executive Summary with the published documents. • Work with the graphic designer to improve navigation within the existing documents for publication. • Post publication, develop a more interactive version of the LNRS, which allows key content to be found, read and accessed more easily. • Review audience needs regarding bespoke summaries and develop these where feasible.

<p>2. Language</p> <ul style="list-style-type: none"> • Too technical • Contains jargon • Difficult to understand • Not sure who the LNRS is written for 	<p>Our response:</p> <ul style="list-style-type: none"> • We acknowledge that some of the language used within the LNRS is technical which will have made it harder to read and understand. • Some technical language was required and/or specified by the statutory guidance. Some terms are difficult to avoid as they are used by land managers and ecological practitioners who expect the strategy to reflect professional/technical standards and be precise enough for application in the field. Some terms are also used within formal systems such as planning and thus need to be used where this is appropriate. • We appreciate that responders may have felt unable to comment on aspects of the LNRS due to its technical nature / that a level of expertise was required to do so. • To aid comprehension of technical words, explanations were provided either within the text or in a linked glossary at the back of Part 1. • Government guidance specified that the consultation seek feedback on all key parts of the LNRS such as the Description, Priorities & Measures, Local Habitat Map, Priority species list and so on. Recognising that not all responders would want to do this or feel they could, all consultation survey questions were voluntary, and responders advised to skip any not personally relevant. Additionally, time was spent crafting questions so that they catered for a range of expertise-levels, with multiple-choice answers including 'I don't know/not sure'. <p>Actions:</p> <ul style="list-style-type: none"> • The team will consider what resources can be provided post publication to assist in understanding technical terms and concepts that meet the needs of a wider range of audiences.
<p>3. Imagery</p> <ul style="list-style-type: none"> • Stag beetle image should a different species. 	<p>Our response</p> <ul style="list-style-type: none"> • Thank you to the responder who alerted us that the photo used in Part 2, page 128 is a lesser stag beetle (<i>Dorcus parallelipedus</i>), and not a stag beetle (<i>Lucanus cervus</i>) as per the caption. <p>Actions:</p> <ul style="list-style-type: none"> • A new photo of a stag beetle will be sourced.

<p>4. Local Habitat Map usability</p> <ul style="list-style-type: none"> • Hard to use • Slow loading times • Doesn't render on a mobile device • Hard to identify elements visually/colours too similar. • Should have photos or illustrations • Maps need more detail • Labels should be added about who owns sites 	<p>Our response:</p> <ul style="list-style-type: none"> • The Local Habitat Map is a large file which contains various layers of information that are specified within the LNRS guidance. Due to its size, we appreciate that it can be slow to load and difficult to navigate, particularly if unfamiliar with ArcGIS and online mapping platforms. • To help people use the map, a PDF guide was provided in the consultation portal. The map was also extensively covered within the consultation webinar (also accessible within the consultation portal). • That the Local Habitat Map is not optimised for mobile devices is a limitation of the technology used in online mapping and, though we recognise this is not ideal, it was made clear in the webinar, in the map user guide and in the disclaimer to the map itself. • A request to add details about who owns sites to the map is not possible due to privacy laws. Additionally, photos cannot be added to the map as this would exceed file storage limits. <p>Actions:</p> <ul style="list-style-type: none"> • We recognise that some of the colours used to denote different map layers are quite similar to each other. They are being amended to provide greater contrast. • We aim to develop further guidance, including videos, to help people become familiar with the mapping platform and its various functions. Existing instructions will also be reviewed to ensure these are as clear as possible.
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B: Description, pressures, principles, habitat priorities and measures

Summary of key feedback	Our response or actions
<p>1. Marine habitats & species</p> <ul style="list-style-type: none"> • Lack of description of the marine environment and the pressures on marine habitats and species • Greater reference to Intertidal chalk reef • Mention of Marine Conservation Zones • Mention marine conservation plans • Seals should be added to the priority list. • Greater emphasis on the interconnectivity of sea and land needed 	<p>Our response:</p> <ul style="list-style-type: none"> • The statutory scope of the LNRS is to mean low water (MLW), essentially the average low tide, which means marine habitats and species are out of scope. This is highlighted in Part 1 Section 2.7. • As a coastal county, we recognise the huge importance of our marine environment and the pressures on it. As set out in Part 1, the LNRS team is working with Sussex Bay and the marine recovery sector to develop a Sussex Seascape strategy ('The Blueprint') to identify priority habitats and species and agree recovery actions. The Blueprint is due to be published in Autumn 2026 and can act as a voluntary marine extension to this LNRS. • We acknowledge that greater reference to intertidal habitats and to the pressures on the marine environment could be made in the LNRS, as well as to the connection between land, rivers and sea. • Seals are not on the East Sussex and Brighton & Hove species longlist due to a lack of records. Other marine mammals such as dolphins were not longlisted as they are outside of scope. <p>Actions:</p> <ul style="list-style-type: none"> • Wording has been added to Part 1 Section 2.7 to draw more attention to, and expand on, the scope of the LNRS regarding the marine environment, including reference to Marine Plans and marine protected areas (MPAs). • A new Principle '<i>Work together through a source-to-sea approach...</i>' has been added to Part 2 to recognise that activities upstream and on land can impact marine habitats and species. This ethos has been embedded in relevant opportunities, priorities and measures and pressures (particularly pollution). • Wording has been added to two measures to show how they relate to intertidal habitats: C1.1: ("<i>Note: this could be particularly beneficial for important biodiverse chalk platforms found off the coast of East Sussex and Brighton & Hove.</i>"); C1.9: "<i>Areas of existing undefended cliff (where natural coastal erosion processes continue) and related intertidal and cliff top areas.</i>" Existing intertidal chalk habitat has also been added to the Local Habitat Map under C1.1 and C1.9.
Summary of key feedback	Our response or actions

<p>2. Farmland description / farming with nature case studies</p> <ul style="list-style-type: none"> • More focus on the work already undertaken by farmers in Sussex to help nature • Farmland around Brighton & Hove described as “<i>rich in pockets of wildlife</i>” • Understates how much farmland has been lost, particularly to housing. • Out-of-date figures for land registered in Defra’s environmental schemes. 	<p>Our response:</p> <ul style="list-style-type: none"> • This LNRS was developed with support from the agricultural and landowning sector including NFU, CLA, The Farming and Wildlife Advisory Group (FWAG) and our Protected Landscapes. One of its key Principles is to ‘<i>Showcase and support action for nature across our farmed landscapes</i>’ and references to farmer-led nature initiatives are included throughout the documents, in particular Section 5: <i>What is already happening</i>. That said, we welcome the opportunity to add further farming case studies into supplementary materials produced after publication and will be working with local partners to identify these. • Farming is a land use that covers >60% of the LNRS area landscape. In many cases it is intensive. It is also true that many farmers and land managers are working to manage woodland, hedgerows, field margins and other habitats for wildlife on their land, and some are working together through farm clusters to support wildlife across a wider scale. This is not to say that more should not/could not be done. Hence this LNRS has a suite of measures for the farmed landscape which have been developed with input from the farming sector and are applicable for implementation in most places. • We appreciate that responders are concerned about the loss of farmland to development. Development as a key pressure on nature is covered in Part 1, Section 4.9. • Land use change statistics to illustrate the percentage of agricultural land lost to development over recent decades is available at national but not county-scale. This would be useful so has been added to list of data to be improved ahead of the next LNRS iteration. <p>Actions:</p> <ul style="list-style-type: none"> • In Part 1, Section 4.3 Farmland and soils, statistics related to land in Sussex registered in environmental schemes have been updated with Defra 2025 figures.
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<p>3. Low Weald description</p> <ul style="list-style-type: none"> • Low Weald is very vulnerable to land use change • Fewer habitats mapped in the Low Weald • Low Weald is important for biodiversity and wildlife, including scrub-filled commons. • Mapping habitat in the Low Weald would help protect them from development. 	<p>Our response:</p> <ul style="list-style-type: none"> • We agree that the Low Weald is particularly vulnerable to development given its location and lack of designation and that it should be highlighted. • In relation to mapping more habitats in the Low Weald, unfortunately this is restricted by the available data. Grassland data is very poor for the Low Weald area and as a result Grassland measures could not easily be mapped. Improvement of this data will be prioritised for the next version of the LNRS. • We appreciate respondents desire to see areas within the Low Weald protected from development, however the LNRS cannot provide new-designations for habitats, species, or places, whether mapped or not. <p>Actions:</p> <ul style="list-style-type: none"> • Wording under Urbanisation (Part 1 section 4.9) has been amended to: <i>“Pressure is greatest within the Low Weald which carries higher housing delivery targets as it lies between the two protected landscapes of the South Downs National Park and the High Weald National Landscape.”</i> • Within Part 1 Section 6: Opportunities, the ‘woodland habitats’ bullet under Low Weald has been amended to reference scrub.
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<p>4. Wooded heath and Friston Forest description</p> <ul style="list-style-type: none"> • No category in which Friston forest can fit since it is largely plantation • Friston Forest not mapped • Wooded heath should be mentioned as an important habitat 	<p>Our response</p> <ul style="list-style-type: none"> • The majority of Friston Forest (near Eastbourne) is deciduous woodland (a habitat of principal importance in England). It therefore falls under the description of deciduous woodland in Part 1 of the LNRS. • There is insufficient data around the location and extent of wooded heath in the LNRS area, so we have not covered it specifically within the priorities or measures, but have added a reference to it in the Description (specifically in relation to habitat mosaics). We also consider it is covered by other measures even if not directly referenced e.g. W1.2, W1.5, W1.8, H1.1. <p>Actions:</p> <ul style="list-style-type: none"> • Friston Forest was not mapped under measure W1.8: <i>‘Bring other priority woodland into positive conservation management’</i>, as it is already covered by a management plan and so excluded for targeting as per the methodology agreed and set out in Part 4. However, this has been reviewed in the light of feedback and concern that it could act as a disincentive for woodland owners with a management plan who may be seeking funding for the implementation of measures. Consequently, Friston Forest will now be included in the map. • Wooded heath wording has been added to the start of Part 1, Section 4.3: <i>“For example, heathlands often form mosaics with other open and wooded habitats. Within the High Weald National Landscape, there are significant areas of broadleaved woodland, much of which is ancient. Heathland occurs along the wooded ridges and heathy habitats can be found within ancient woodlands where they may once have been managed under a pasture woodland management system. These ‘wooded heaths’ or ‘heathy woods’ are an important element of the High Weald biotope mosaic. Programmes aimed at restoring either heathland or woodland do not necessarily address the fact that there is a spectrum of biotopes between heathland and woodland – wooded heaths. There is currently insufficient data around the location and extent of wooded heath in East Sussex and Brighton & Hove, and as such it has not been considered as a separate and distinct habitat in this LNRS. However, sympathetic management of woodland within the High Weald is likely to benefit any wooded heaths present, and our priorities and measures for lowland heathland and associated species measures recognise the need to manage heathlands to create a mosaic of habitats, including woodland”</i>.
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<p>5. Lowland heath description</p> <ul style="list-style-type: none"> • Recognise lowland heathland as one of East Sussex’s most threatened habitats • Description mentions bird species but not lowland plants. • Marsh clubmoss (<i>lycopodiella inundata</i>) and Hairy greenwood (<i>genista pilosa</i>) are no longer present in Ashdown Forest. 	<p>Our response:</p> <ul style="list-style-type: none"> • We agree that lowland heathland is one of the most vulnerable habitats in the LNRS area and have amended its description accordingly. Additional wording has also been added to Lowland heath measure H1.1 to reference declining lowland plants. • The description of lowland heathland in Part 1 lists the common plant species that make up the different heathland habitat types. Bird species Nightjar and Dartford warbler are specifically mentioned as Ashdown Forest is internationally important for them, but other species of flora and fauna are also listed. Furthermore, heath lobelia, marsh clubmoss, upright chickweed, and all heathland plants, have been listed as priority species in Part 3 with a further 23 vascular plants noted as being supported by heathland measures. <p>Actions</p> <ul style="list-style-type: none"> • In Part 1, Section 4.3, the description of lowland heathland has been amended with “<i>one of our most threatened habitats</i>”. • Wording has been added to Measure H1.1 under ‘Where’: “<i>Existing heathland sites, particularly those not in conservation management and/or where there has been a decline in lowland plant species.</i>” • References to marsh clubmoss and hairy greenwood have been removed from the description of species found in Ashdown Forest.
<p>6. Wetlands description:</p> <ul style="list-style-type: none"> • Deer pressure is an issue in wetlands as well as woodland • Lewes Brooks importance for species. • Highlight that coastal and floodplain wetland systems in East Sussex are critical to many species and ecosystem benefits. 	<p>Our response:</p> <ul style="list-style-type: none"> • We acknowledge that deer pressure, which is one of the major factors impacting woodland, can also be significant in wetlands. • We also accept that Lewes Brooks is important for wetland species and that we could further emphasise the importance of wetland systems. <p>Actions:</p> <ul style="list-style-type: none"> • Wording on deer pressure in Part 1 Section 4.9 has been amended to: “<i>...significant impact on the health of many of our habitats, including wetlands, grasslands and heathlands, but is one of the most significant pressures on our woodlands</i>” • Wording added to the grazing marsh description within Part 1, Section 4.3: “<i>Lewes Brooks holds regionally important populations of wetland invertebrates, aquatic plants, water vole, snipe and wintering waders</i>” • Wording added Part 1 Section 4.2 South Downs NCA description: “<i>These areas are critical for waders and wildfowl, breeding redshank and lapwing, wetland invertebrates and water vole, and also play an important role in climate adaptation through flood storage.</i>”

<p>7. List of irreplaceable habitats</p> <ul style="list-style-type: none"> • Definition of • Chalk streams should be included as an irreplaceable habitat 	<p>Our response:</p> <ul style="list-style-type: none"> • The definition of irreplaceable habitats provided in Part 1 Section 4.7 is the recognised legal definition in the National Planning Policy Framework (NPPF) which is the primary means for their protection. Habitats that have been defined as irreplaceable in government Regulations are also listed in this section. • We agree that chalk streams (and in our opinion sandstone outcrops) would meet the NPPF definition however they are not formally or legally recognised as such and so have not been added. <p>No action</p>
<p>8. Ecosystem services and benefits table</p> <ul style="list-style-type: none"> • Species-rich grassland and heathland do support water supply • Wetlands, rivers and streams do support pollination • Wetlands do support food/fibre 	<p>Our response:</p> <ul style="list-style-type: none"> • Part 1, Section 4.8 includes the table: <i>'Ecosystem services and benefits provided by natural capital'</i>. This was developed in 2019 based on the Millennium Ecosystem Assessment and other literature at the time. Several responders requested changes to this table. <p>Actions:</p> <ul style="list-style-type: none"> • The table has been amended in line with the following: • species-rich grasslands support water flow regulation (storage and recharge); wetlands, rivers and streams support pollination (via their flowering plants, riparian habitats, floodplains and saltmarshes); wetlands produce food and fibre (they support fisheries and fish nurseries (such as coastal wetlands), and fibres such as reeds, while floodplains support grazing livestock.
<p>9. Invasive species list</p> <ul style="list-style-type: none"> • New Zealand pygmyweed • Rosa rugosa (Japanese rose) • Yellow-legged hornet 	<p>Our response:</p> <ul style="list-style-type: none"> • Part 1, Section 4.9 Pressures on nature in East Sussex and Brighton & Hove includes a table of the invasive non-native species (INNS) that pose the greatest risk. • Three additional INNS were suggested by responders. <p>Actions:</p> <ul style="list-style-type: none"> • These were considered and have been added to the list of invasive non-native species [table].

<p>10. Light pollution</p> <ul style="list-style-type: none">• Not enough emphasis on this as a pressure• More emphasis on initiatives to combat it e.g. Dark Skies• Measures needed to reduce light pollution	<p>Our response:</p> <ul style="list-style-type: none">• Part 1 Section 4.9 of the LNRS details the key Pressures on nature in East Sussex and Brighton & Hove. While light pollution is mentioned under Pollution in this section (which notes its impact on “<i>moths, bats and other nocturnal species</i>”) and Urbanisation, Dark Skies’ initiatives were not referenced. This has been amended.• While the LNRS can highlight the impact of pressures on nature, it has no power to tackle the source of these. It does, however, provide an enabling measure U2.6 (EM) In Part 2, Section 4, Urban Nature, which encourages the adoption of planning policies to “<i>avoid and reduce light impacts on flying bats, birds and other wildlife</i>”. <p>Actions:</p> <ul style="list-style-type: none">• Wording has been added to Part 1 section part 4.9: “<i>Minimising light pollution is a particular focus in parts of the LNRS area notable for their current lower levels of light pollution and where ‘dark skies’ approaches are encouraged. For example, High Weald National Landscape provides guidance for local authorities on how to reduce light pollution impacts from new development while the South Downs National Park, as a planning authority, has produced a Dark Skies Technical Advice Note.</i>”
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<p>11. Bio-beads and other microplastics</p> <ul style="list-style-type: none"> • Bio-beads should be highlighted as a pressure and have measures to mitigate it. • Fibreglass should be mentioned. • Measures to mitigate sewage pollution should be added. 	<p>Our response:</p> <ul style="list-style-type: none"> • In November 2025, a catastrophic spill of plastic bio-beads used in sewage processing washed up on the rare, important and sensitive coastal habitats found at Rye Harbour Nature Reserve and Camber Sands. The LNRS team acknowledges the devastating impact this event had and the desire by many responders to see bio-beads called out and tackled in the LNRS. • The pressures section has been strengthened to acknowledge the impacts of bio-beads and other microplastics. As it is outside the statutory scope of the LNRS to address the sources of this pollution as well as that caused by sewage (impacts to water quality are covered under specific regulatory processes overseen by the Environment Agency), a measure has not been added. <p>Actions:</p> <ul style="list-style-type: none"> • Wording has been added to Part 1 section 4.9 under ‘Plastics’: <i>“Litter (see below) is a well-known source of plastic pollution and microplastics are finding their way into all of our ecosystems (but particularly our freshwater and marine ecosystems) via clothes (laundry), paint and the use of sewage sludge as fertiliser in agriculture. Bio-beads, often used in water treatment processes, are also finding their way into the environment from industrial discharges/spillages.”</i> • Further down in this section we have also added: <i>“Recent research in Sussex is raising concerns that microplastics are now being found across the entire food chain of our local wildlife. The impact of this on our biodiversity is thought to be negative but precise effects are still being researched”.</i>
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<p>12. Water quality and flooding</p> <ul style="list-style-type: none"> • Flood risk and its impact to nature (esp. from saline intrusion). • Wording around pollution and water quality is not strong enough given the damage to SSSIs. • Fencing around angling lakes should be added as a pressure. 	<p>Our response</p> <ul style="list-style-type: none"> • Increased risk of flooding generally and coastal flooding specifically is referenced within Part 1, Section 4.9 ‘Pressures on nature in East Sussex and Brighton & Hove’. However, we acknowledge that saline intrusion could be further emphasised, so new wording has been added. • We also recognise the need for greater emphasis on the impacts of poor water quality on our important habitats. • A comment requesting that fencing around angling lakes be highlighted as a barrier to wildlife was considered. We are not aware that this is major issue in the LNRS area and as such have not included it. <p>Actions</p> <ul style="list-style-type: none"> • Wording has been added to the Section 4.9 under ‘Climate change’: <i>“Rising sea levels are increasing the risk of flooding along tidal reaches of rivers and the risk of saline intrusion into freshwater habitats. Saline intrusion can completely change the characteristics of these habitats, placing their future at risk.”</i> • A concluding sentence has been added in Part 1 Section 4.9, under ‘Poor water quality’: <i>“This is having particularly serious knock-on impacts on protected wetland sites, coastal habitats and estuaries, harbours and marine areas, and is one of the most significant barriers to nature’s recovery in the LNRS area”.</i>
<p>13. Scale and accumulation of pressures</p> <ul style="list-style-type: none"> • Add the scale of impact/strength of each pressure • Acknowledge the cumulative impacts of pressures 	<p>Our response</p> <ul style="list-style-type: none"> • Unfortunately, the data does not exist to understand the precise impact of every pressure on habitats and species in Sussex. • We acknowledge that many pressures on nature are interconnected and that their individual impact is increased when accumulated. This will be highlighted. <p>Actions:</p> <ul style="list-style-type: none"> • Wording added to the start of Part 1 Section 4.9 to reference accumulation: <i>“Pressures on the environment, such as climate change, pollution, urbanisation etc, are complex and interconnected and are creating some direct impacts on nature, many of which are likely to be cumulative”.</i>

<p>14. National Trails and related initiatives</p> <ul style="list-style-type: none"> • Add King Charles III trail, South Downs Way and Coastal Wildbelt initiative. 	<p>Our response:</p> <ul style="list-style-type: none"> • National Trails are designated long distance routes across the UK that provide access to nature for people. • The draft Local Habitat Map’s ACIB layer had mapped the King Charles III trail and its associated coastal margin layer (see measure Cor 3.6). However, areas of this measure which fall within SSSIs (e.g. Chichester Harbour, Pagham Harbour and Rye Harbour) have not been mapped at the request of Natural England. <p>Actions:</p> <ul style="list-style-type: none"> • Wording added to Part 1 Section 2.5 Our LNRS area to highlight National Trails: <i>“Two National Trails run through the LNRS area and provide opportunities to connect people with nature: the South Downs Way and the King Charles III England Coast Path”</i> • Reference to ‘Coastal Wildbelt’, a new national initiative has been added to Part 1, Section 5.2.
<p>15. Has the LNRS considered the historic environment?</p>	<p>Our response</p> <ul style="list-style-type: none"> • Yes. The LNRS contains many measures that seek to restore, improve, buffer etc., the historic environment including ancient woodland (Priority W1 and all the measures that support it, plus W2.1, SCr1.3, SL1.2), ancient grassland (G1.3), ancient hedges (FL1.5) and lost ponds (SWB1.2). Links to relevant guidance and support have also been provided where possible. • Any nature recovery work should consider the impact to the historic environment, with landowners and land managers advised to seek historic and archaeological records or guidance to better understand their site. • Note that the LNRS is not a landscape character strategy. To develop this LNRS, we have relied upon National Character Area profiles which cover the county, the detailed Landscape Character Assessments that exist for East Sussex and the South Downs National Park, and the High Weald National Landscape Management Plan – all of which take the historic environment into account. <p>No action.</p>

<p>16. Role of community groups, volunteers and parish councils</p> <ul style="list-style-type: none"> • Emphasise importance to nature recovery • Add other community group achievements • Need to invest and support voluntary groups and volunteers • Important role of parish councils 	<p>Our response:</p> <ul style="list-style-type: none"> • We have reflected on the invaluable work of local community groups, town and parish councils and others, many of whom are volunteers, in Part 1 Section 5.3 Community Action, and shared a flavour of their key achievements (as submitted to our Sussex LNRS community groups survey, open Feb 2024-Sept 2025). We also appreciate the need for funding and resources, without which, their activities and impact are limited. <p>Actions</p> <ul style="list-style-type: none"> • While we cannot add additional achievements into the documents in time for publication, we aim to continue highlighting the amazing nature recovery work that is taking place across the LNRS area as we move towards delivery. We will also consider how these groups and organisations can be supported to implement the LNRS within the delivery phase.
<p>17. Hastings references</p> <ul style="list-style-type: none"> • Few Hastings images or references • Include Groundwork Bee Project as an example of nature recovery in Hastings 	<p>Our response:</p> <ul style="list-style-type: none"> • In a strategy covering the whole of East Sussex and Brighton & Hove, it is difficult to focus too much on certain locations. Hastings is referenced in Part 1 Sections 2.5 (our LNRS area), 4.2 (NCAs), 4.3 (Habitats – Maritime Cliff and Slope, neutral grassland, woodland, sandstone outcrops), and 6 (opportunities). In Part 2, Hastings projects are given as case study for Cor3.6. Hastings also has an ecological network mapped on the APIB thanks to evidence provided by Hastings Borough Council. <p>Actions:</p> <ul style="list-style-type: none"> • Wording has added in Part 1 Section 5.1 to reference the Groundwork South Rare Bee Project in Hastings. • Inclusion of images of nature recovery in Hastings will also be considered.
<p>18. How does the LNRS address public access to nature?</p> <ul style="list-style-type: none"> • Stress importance of maintaining access to the countryside • Improve footpaths 	<p>Our response</p> <ul style="list-style-type: none"> • The primary function of the LNRS is to encourage the creation and improvement of habitats. Repairing our connection to nature, and having more nature nearby, is championed within Principle 7: <i>Bring nature into everyday life...'. The way that the LNRS can achieve this within its scope is by encouraging the creation and improvement of habitats near people (e.g. in urban areas) rather than by removing the obstacles to people accessing them. By way of example, the LNRS aims to encourage more nature near footpaths, however maintenance of footpaths, or provision of additional access is out of its scope.</i> <p>No action</p>

<p>19. Rights of Rivers, Rights of Nature and Crowhurst Yew Tree Personhood – more reference to</p>	<p>Our response:</p> <ul style="list-style-type: none">• Rights of Rivers/Rights of Nature/Personhood is a growing international movement to encourage the adoption of a Universal Declaration of Rights in law. The aim is that by doing so, vital protections for rivers and other ecosystems can follow.• In February 2025, the River Ouse catchment had its rights to exist and thrive formally recognised by Lewes District Council, the first UK catchment to achieve this. In recognition of these efforts, the Love Our Ouse group’s achievements were mentioned in Part 1 Section 5.3: Community Action.• This action has inspired other councils to confer rights to nature, including a 1,300 year old Yew tree in Crowhurst. A reference to this will be added.• As the LNRS is concerned with the creation and improvement of habitats, rather than their protection, a measure encouraging the Rights of Rivers or Rights of Nature has not been included. <p>Actions:</p> <ul style="list-style-type: none">• Wording has been added to Part 1, Section 5.3 community Action: <i>“In 2025, Rother District Council passed a motion to recognise and protect the rights of Rother Trees. The motion also welcomed the decision of Crowhurst Parish Council to support ‘personhood status’ for the Crowhurst 1066 Yew tree and the commitment from the community to take on guardianship of this unique tree.”</i>
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<p>20. Data and evidence</p> <ul style="list-style-type: none"> • Greater prominence in the strategy and how it underpins all decision making • Description is too high level • Need to be aware of what we have before deciding on priorities. • Role and need of local recorders 	<p>Our response:</p> <ul style="list-style-type: none"> • Data and evidence have been instrumental in producing this LNRS. While not a driver of nature recovery in and of themselves, they are enablers that underpins this strategy as well as decisions about how and where to recover nature on the ground. We accept the need to give them greater prominence in the LNRS. • The LNRS relies heavily on the evidence, mapping, and species data available which varies in quality, coverage and consistency. For example, some habitat data held at a national level hasn't been ground-truthed and may be out date. Wherever possible, this LNRS uses local data where we know it is accurate. However, this is limited in its extent and dependent on records submitted by local recorders who do so in their own time. • A list will be made of data gaps to be addressed ahead of the next iteration of the LNRS. However, gaps which require significant funding (e.g. for surveys) may not be possible to fill. • We acknowledge that whilst it is desirable to have all evidence before taking decisions, in this case the LNRS had to be produced using the data available; and more generally the plight of nature requires action to be taken now, thus we have designed this LNRS in a way that is mindful of gaps in evidence to ensure no harm is done. <p>Actions:</p> <ul style="list-style-type: none"> • Within Part 1, Section 5.2, Data and evidence will now be represented within the graphic: '<i>Our building blocks of landscape recovery</i>', to illustrate that they are integral to the success of recovery initiatives. • Anyone can contribute to improving our local evidence base to help boost local understanding of our most important areas for wildlife. Additional wording has been added to Part 1 Section 2.10 to encourage those with an interest to submit species records via online platforms like iRecord.
<p>21. Principle 1: In our core areas hold on to what we have</p> <ul style="list-style-type: none"> • Highlight the resilience needed to help 'what we have' cope with climate change 	<p>Our response:</p> <ul style="list-style-type: none"> • We acknowledge that holding on to what we have will require building in resilience so that habitats are more adaptable to climate extremes. <p>Actions:</p> <ul style="list-style-type: none"> • Wording amended in Part 2, Principle 1: "<i>This will include understanding the impacts of climate change on our most vulnerable habitats and species, and how approaches to management may need to change through time.</i>"

<p>22. Principle 2: Create a network of ‘bigger, better, more and joined-up’ wildlife rich spaces</p> <ul style="list-style-type: none"> • Reference 30by30 goal • Clarify how Principle 2 fits with other strategies e.g. National Highways. 	<p>Our response</p> <ul style="list-style-type: none"> • 30by30 refers to the UK commitment to protect 30% of land and sea for nature by 2030. This goal is referenced within the graphic and footnote in Part 1 Section 2.7, but we agree it is relevant to Principle 2. • The LNRS sets out the approach to nature recovery, but it is not a land use strategy so does not seek to identify trade-offs between different land uses. However, it is an evidence base that other plans, strategies and documents will need to take into account. <p>Actions:</p> <ul style="list-style-type: none"> • Wording added to Principle 2 to show how the LNRS supports 30by30: <i>“Whilst the LNRS cannot identify new areas to be given legal protection, this principle, and priorities and measures arising from it, will help to support the UK’s commitment to protect and conserve a minimum 30% of land and sea for biodiversity by 2030, known as 30by30. The target is seen as a key driver in reversing the decline of nature in the UK, by expanding and improving our protected areas and creating new areas for wildlife, allowing nature to spill over into the wider landscape.”</i>
<p>23. Principle 3: Think big and work at scale</p> <ul style="list-style-type: none"> • How do LNRS actions coordinate with CFMP and LFRMS plans? • How can big actions be translated to clear tangible action at an accessible scale. • The need to bring partners together in support of this principle. 	<p>Our response:</p> <ul style="list-style-type: none"> • Catchment Flood Management Plans (CFMP) and Local Flood Risk Management Strategies (LFRMS) were reviewed during the preparation of the draft LNRS and their priorities informed the development of its priorities and measures; there are multiple references to Catchment Partnerships and Flood Management Strategies throughout them. Delivery of the LNRS will be dependent on these existing plans, strategies and partnerships and is intended to add value rather than to duplicate effort. They are also specifically mentioned in the new Principle <i>“Work together through a source-to-sea approach”</i>. • In relation to translating big interventions into tangible actions, we believe this is covered by Principle 7 in the draft LNRS which is about bringing nature into everyday life and reflects the ambition of communities and residents to take action for nature. Additionally, multiple measures have been provided that can be implemented by anyone, anywhere, at any scale, particularly those supporting the Nature Networks priority. <p>Actions</p> <ul style="list-style-type: none"> • We agree that bringing partners together to help achieve the aims of the LNRS will be essential and will be considered as part of the delivery phase.

<p>24. Principle 6: Invest and use nature to deliver benefits</p> <ul style="list-style-type: none"> • Expand on the practical challenges of implementing Nature-based Solutions and link to existing plans. • There will be a need to join up with water companies to help fund sustainable drainage systems. 	<p>Our response:</p> <ul style="list-style-type: none"> • The LNRS is intended to highlight opportunities for nature recovery, rather than to focus on the challenges of how they might be delivered, though we acknowledge the many barriers to implementation, whether practical, bureaucratic or related to funding. • Local flood and coastal risk management strategies were reviewed and fed into the development of the LNRS. We acknowledge the need to work with all relevant stakeholders, including water companies during the delivery phase. <p>No action.</p>
<p>25. Principle 7: Bring nature into everyday life</p> <ul style="list-style-type: none"> • Principle 7 should move further up given its importance • Expand on the health benefits of spending time in nature • The need for better education and awareness • Acknowledge role of Local Authorities in maintaining greenspaces 	<p>Our response:</p> <ul style="list-style-type: none"> • There is no ranking to the importance of the principles. Their implicit ordering is more to do with scale of action and co-benefits. This principle simply reflects that the LNRS aims to improve and create nature everywhere so that people can access it, rather than being specifically about health. We did, however, want to express the connection and benefits to health of spending time in nature, hence including it. We are also one of the few Responsible Authorities in the country that has included specific priorities and measures for nature and health which raises the profile of this issue. • It is not within the scope of the LNRS to understand how best to connect people to nature for the benefit of their health and wellbeing. Rather, the aim is to encourage the creation of more nature everywhere that will increase this opportunity. <p>Actions:</p> <ul style="list-style-type: none"> • Additional wording has been added in this principle under '<i>Our strategy aims to help this by</i>' to highlight how it can help Local Authorities and others maintain greenspaces: "<i>Identifying options for enhancing existing greenspaces that can be taken forward by local authorities, town and parish councils and local community groups so they are more valuable for wildlife and people.</i>" • We agree that more education and awareness about the benefits of nature is needed. This will be explored further through the LNRS delivery phase with partners such as Sussex Wildlife Trust, South Downs National Park and Weald to Waves.

<p>26. Priorities & Measures</p> <ul style="list-style-type: none"> • Too many priorities and measures • Difficult to navigate • Include 'Who' will implement them • The 'Where' column doesn't have actual locations • Add other case studies or links e.g. to MAGIC 	<p>Our response:</p> <ul style="list-style-type: none"> • There are 24 priorities in this LNRS and 106 measures. These were agreed as a result of extensive stakeholder engagement and ecological evidence, as summarised at the beginning of Part 2 Section 4. • We appreciate that the measures can be hard to navigate in the PDF format. We are considering a more interactive version post publication to improve navigation. (See A1). • Many additional resources and case studies were suggested for the 'Further info/guidance' column. Some will be added to the published version where space allows, but a future interactive version would be able to accommodate more of these. • A column to highlight which stakeholders each measure is relevant for was considered but not included as it was repetitive and made the tables and document longer. It will be considered for a future interactive version of the LNRS, along with bespoke guides for different users. • The 'Where' column describes the type of places that could be suitable e.g. "All sand dunes sites" rather than specific places. This is especially necessary for measures that cannot be mapped. The Local Habitat Map, meanwhile, shows where those measures that can be mapped could be implemented in the LNRS area to achieve the greatest benefits for nature and the wider environment. Both resources are intended to help you decide upon the most appropriate measures for your land or area of management, along with external resources. <p>Actions:</p> <ul style="list-style-type: none"> • The following has been added into the definitions table at the beginning of Part 2 Section 4 in relation to 'Where': <i>"This is particularly important for measures that could not be mapped, either because of insufficient data, or because they could be implemented anywhere with similar benefits. MAGIC maps includes a range of national data on habitats, geology and soil, flood zones etc which may be helpful in identifying areas for beneficial implementation of measures."</i> • We appreciate that some links to guidance and case studies may expire. A footnote has been added to state that links were correct at the time of publication.
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<p>27. Enabling measures</p> <ul style="list-style-type: none"> • Role and function • Who will deliver them • Should all priorities have an enabling measure for monitoring? • Should all priorities have an enabling measure for best practice? 	<p>Our response:</p> <ul style="list-style-type: none"> • While ‘<i>measures</i>’ are the actions that will deliver the priorities on the ground, ‘<i>enabling measures</i>’ (denoted in the LNRS with ‘(EM)’), are various types of activities that are needed to make delivery easier or more likely. They fall out of scope of the LNRS and so are noted separately from core measures. They are included as stakeholders frequently raised them as being vital to underpin and support the delivery of LNRS priorities. • No specific responsibility for enabling measures has been identified within the LNRS. It will be up to the wider delivery community (including local authorities, environmental organisations, partnerships and initiatives) to work together to identify who is best placed to take them forward in the years ahead. • A monitoring and evidence gathering enabling measure was specifically included for farmland habitats (FL1.12 (EM) as good ecological data isn’t currently available (other than RPA data which we do not have access to). A full analysis of the data and monitoring required for delivery and for the LNRS review will be developed as part of the delivery phase. <p>Actions</p> <ul style="list-style-type: none"> • Rather than add an enabling measure related to best practice for all priorities (which would become repetitive), the following statement has been added to the definitions table at the start of Part 2 Section 4: <i>“Further information includes references to best practice on habitat management where available. It is expected that all habitat management should give due regard to the potential for protected species and follow best practice guidance.”</i>
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<p>28. Coastal priority and measures (ex marine covered in B1)</p> <ul style="list-style-type: none"> • C1.4 expansion of existing sites of vegetated shingle can only be done if the beach material is stable • C1.4 should specify the retention of natural tide swept debris • C1.10 More depth needed on the tangible actions to tackle recreational pressures. • Consider Voluntary no anchor zones and eco-moorings to protect areas of seagrass from boating pressure 	<p>Our response:</p> <ul style="list-style-type: none"> • All measures are likely to incur a cost, and different techniques may be appropriate in different areas. The ‘Where’ column refers to sites where conditions will support the measure. The ‘how’ column lists potential options and states that these will be site dependent. We consider that measures currently include the correct level of information for this version of the LNRS, though we recognise that coastal sites will need bespoke approaches. This will be considered further during the delivery phase. • C1.4 specifically references the retention of natural tide swept debris. We acknowledge that the impacts of shingle reprofiling will vary. However, the reference to shingle profiling as a potential option for the expansion/creation of new areas gives an option for how new areas could be created and does not refer to shingle reprofiling for coastal defence works. • We note the initiatives used to reduce damage from mooring chains and to enhance existing areas of seagrass. These actions are, however, out of scope of the LNRS as they are below mean low water (MLW). <p>No action</p>
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<p>29. Farmland priorities and measures</p> <ul style="list-style-type: none"> • FL1: importance of highlighting that food production can also benefit nature / conservation is already happening on farms • Reduce use of pesticides and herbicides. • FL1.2: Stress the importance of site section to minimise the risk of seed spread onto neighbouring land • FL1.2: mowing should be used instead of pesticides • Add priority farmland species: beaver, otter, reptiles and amphibians. • Reference the role that BNG can play in helping delivery 	<p>Our response:</p> <ul style="list-style-type: none"> • That food production is compatible with nature recovery is recognised throughout the LNRS. It appears in Part 1, Section 4.8 Table 1 (<i>Ecosystem services and benefits...</i>), in Sections 4.9, 5.1, 5.2 and 6, and in Part 2 Principle 4: <i>Showcase and support action for nature across our farmed landscape</i>. Principle 4 also recognises that initiatives for nature are being implemented by farmers and land managers, while the farmland description in Part 1 Section 4.3 states that 49% of farmland in the LNRS area is under Environmental Stewardship. • Reducing use of pesticides and herbicides is already covered by measures: FL1.2, FL1.5 and FL1.7 as well as SL1.3, U2, Cor3.3, Cor3.4 and Cor3.5. • We welcome the clarifications to measure FL1.2 which have been added. • Whilst the priority species beaver is likely to benefit from farmland habitat measures such as FL1.5, there may be reticence over their introduction into the farmed landscape in some locations. It is therefore important that future beaver reintroductions are fully informed through collaboration between beaver management groups and landowners to ensure coexistence and the maximisation of ecological and natural water management benefits. <p>Actions:</p> <ul style="list-style-type: none"> • FL1.2: clarifying wording added to (Where): <i>“Likely to be best on edges and margins with rest of the field in crop”</i>. And <i>“Avoid areas with high weed burden, especially where there are injurious weeds in the seed bank”</i> and <i>“Note: At the end of the rotation, areas should be cleared by mowing or cultivation rather than the application of herbicides.”</i> • In relation to otters, the Streams & rivers assemblage (which includes otter) has been added to the priority species that would benefit from FL measures. • We agree that BNG as a farming incentive for nature recovery could be further emphasised. Wording has been added to the final F1 outcome statement: <i>“Farm and land-based business are on a positive trend towards economic and environ-mental sustainability, with nature-based solutions and the establishment of habitat banks for biodiversity net gain forming part of their farm business model”</i>.
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<p>30. Soil health priority and measures</p> <ul style="list-style-type: none"> • SL1.5 ensure support for farmers to make changes considers their financial sustainability. 	<p>Our response:</p> <ul style="list-style-type: none"> • We agree that where farmers are being encouraged to make quite significant changes, it's important that support and guidance is aligned to the financial sustainability of their business. <p>Actions:</p> <ul style="list-style-type: none"> • Wording in SL1.5 (EM) has been amended with: <i>“Provide advice and support for introduction of healthy soil management techniques that align with supporting financially viable and resilient farming businesses.”</i>
<p>31. Species-rich grassland priorities and measures</p> <ul style="list-style-type: none"> • Creating species-rich grassland within institutional estates • Help managers gain a better understanding of where grassland measures can be implemented by signposting to Soilscales and geological data. 	<p>Our response:</p> <ul style="list-style-type: none"> • Whilst the ambition is welcomed, it is unlikely that good quality species-rich grassland can be created within institutional estates. We consider that such areas can, however, make a significant contribution to other priorities and measures, e.g. urban nature and nature networks. <p>Actions:</p> <ul style="list-style-type: none"> • Regarding signposting, the following has been added to the definitions table at start of Part 2 Section 4: <i>“MAGIC maps includes a range of national data on habitats, geology and soil, flood zones etc which may be helpful in identifying areas for beneficial implementation of measures”.</i>

<p>32. Woodland priorities and measures</p> <ul style="list-style-type: none"> • Change the word ‘enhance’ (used in W1 priority) as this is subjective. • Change the word ‘quality’ [of woodland habitats] in measure W1.1. • Consider grey squirrel management as well as deer management • Strengthen priorities around rare ancient woodland ravine systems • Ensure new trees are planted evenly apart • Reference general size of coppicing plots to woodland area (%) • Reference need for woodland management plan • PAWS restoration benefits from the use of heavy horses rather than conventional forestry machinery • Include measures to maintain standing and fallen dead wood 	<p>Our response:</p> <ul style="list-style-type: none"> • The wording of the priorities was agreed through a series of workshops with key delivery partners including Woodland Trust and Forestry Commission. The term ‘favourable condition’ was avoided as it is often associated with SSSIs and requires definition and the meeting of specific criteria. While we accept ‘enhance’ is subjective, W1 measures use more specific wording. • We agree that the word “<i>quality</i>” in Measure W1.1 can be replaced with “<i>ecological condition</i>”. • Landscape-scale deer management was considered the most important action for woodlands and thus has its own specific measure (W1.1). Though a measure specifically for the impacts of grey squirrels on woodland and native species has not been included, this is referenced in measures W1.2, W1.8, W1.9, W1.11, in W1’s outcome statements and within Part 1 Section 4.9 Pressures. • Ancient woodland ravine systems are covered by measure W1.3 which is specifically for the enhancement of gill woodland. • Appropriate spacing of trees and the size of coppicing plots is best practice, for which multiple links are provided in W1 and W2 measures. • W1 measures specifically reference the need for management plans. New wording has been added in some measures to stress the need to follow best practice with regards to protected species. • We agree that PAWS restoration should consider low impact extraction and have added this wording. • Deadwood is already mentioned in measures FL1.4, W1.2, W1.3, W1.5, W1.6, W1.8 and W3, but some references have been amended to specifically reference ‘<i>standing and falling</i>’ deadwood. <p>Actions:</p> <ul style="list-style-type: none"> • Wording of measure W1.1 has been changed to: “...to <i>reduce the impact of deer on woodland regeneration, recolonisation and ecological condition of woodland habitats</i>” • Wording added to W1.2, W1.6, W1.7 and W1.8: “<i>Management should follow best practice with regards to protected species</i>” • Wording added to W1.2 and W1.7 “<i>Consider low impact extraction, e.g. heavy horses, for sensitive sites</i>” • References to “<i>standing and fallen</i>” deadwood have been added to W1.2, W1.3 and W1.8.
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<p>33. Hedgerow and Scrub priorities and measures</p> <ul style="list-style-type: none"> • More emphasis on managing hedgerows for nature • Mention hedge damage acceleration due to tractor-mounted flails and cutters • Enforce hedgerow protections • Scrub: add priority bird species • Include timings for hedgerow and scrub management, and trimming outside of bird breeding season, and active seasons for dormouse and hazel mouse 	<p>Our response</p> <ul style="list-style-type: none"> • Priority Hdg1 has four measures which cover the enhancement, expansion, restoration and connection of our network of hedgerows. They are also referenced in the measures for other priority habitats: Farmed Landscape and Soils, Woodland, Rivers and River Systems, Standing Water Bodies, Urban Nature and Nature Networks. • While flailing is cited as an issue in the Description of hedgerows in Part 1 Section 4, it can also be the most efficient way to cut hedges and does not have to be destructive if done properly, with the right equipment at the right time. • While we acknowledge concerns raised about the loss of hedgerows, it is beyond the scope of the LNRS to enforce their protection. <p>Actions</p> <ul style="list-style-type: none"> • Nightingale & turtle dove have been added to ‘<i>species that would benefit from</i>’ measure Scr1.1. • Regarding ideal timings for hedgerow and scrub management, as this applies to many other measures, a statement has been added to the definitions table at the start of Part 2, Section 4 Priorities & Measures, to specify that all habitat management should give due regard to protected species and follow best practice guidance.
<p>34. Rivers and streams priorities and measures</p> <ul style="list-style-type: none"> • R1.1 Beaver re-introductions need to be underpinned by a funded long-term management plan • Bats and otters benefit from restoration of riparian systems • Specifically reference water company failings within the R1, A1 and Wt1 • Include Water Company funded habitat restoration initiatives and case studies 	<p>Our response</p> <ul style="list-style-type: none"> • We agree that species reintroductions (such as beaver) should have long term achievable management plans and careful impact assessments. • The pressures section has been strengthened to acknowledge the impacts of sewage and bio-beads (See this report B11) However, it is outside the scope of the LNRS to address the source of this pollution. <p>Actions</p> <ul style="list-style-type: none"> • In relation to beavers, wording has been added to R1.1: “<i>any future reintroduction of beaver must be underpinned by a funded long-term management plan and carried out under licence...</i>”. • Bats and otters have been added to the list of priority species that will benefit from River measures. • We would like to provide more information on potential funding options such as water company initiatives, in addition to more case studies and this is a consideration for the LNRS delivery phase. See A1 for more details

<p>35. Aquifers priority and measures</p> <ul style="list-style-type: none"> • A1.1 SuDS not all solutions workable everywhere • Add enabling measure to reference role of planning policies in ensuring SuDS etc. support improvement to ground water quality. • A1.2 Stronger reference to impact of herbicides and pesticides on aquifers • Other measures overlap/support aquifer measures 	<p>Our response</p> <ul style="list-style-type: none"> • SuDS (Sustainable Drainage Systems) are ways to manage surface water that take account of water quantity, water quality, biodiversity and amenity. We appreciate that SuDS policy is constantly developing as our understanding and technology improves, so latest government guidance has been added. • Measure A1.2 refers to “<i>reduced use of chemical inputs</i>” to help aquifers; we accept that this could specifically reference herbicides and pesticides. • We acknowledge that measures FL1, U1, PS1, COR1 also support aquifer health in addition to those listed. <p>Actions</p> <ul style="list-style-type: none"> • A1.1 added link to SuDS national standards (2025) • A new enabling measure A1.4 EM added: “<i>Adopt planning policies for new developments to incorporate SuDS where possible and appropriate to support improvement of ground water quality</i>”. • A1.2 wording added under ‘How’ to specify herbicides and pesticides • Wording added to the end of the Aquifer section to reference other priorities that overlap/support it.
<p>36. Standing waterbodies priorities and measures</p> <ul style="list-style-type: none"> • Future considerations of climate change e.g. increase in mosquito population • SWB1.1. Specific mention of dew ponds that provide ‘stepping stones’ for species migration 	<p>Our response</p> <ul style="list-style-type: none"> • It is acknowledged that climate change is leading to a change in the distribution and range of species such as mosquitos. The potential impacts of this, and specifically, links to vector borne disease falls under the jurisdiction of the UK Health Security Agency and the Centre for Climate and Health Security and is out of scope of the LNRS. As our understanding develops, this may be considered in later iterations of the LNRS. • Habitat mosaics generally are referred to as ‘stepping stones for wildlife’ within Part 1. Stepping stones are also specifically mentioned in the outcome statements for Wetland habitats and Nature Networks. Whilst it is acknowledged that dew ponds do provide stepping stones, so do all habitats, depending on the species. <p>No action</p>

<p>37. Urban Nature priorities and measures</p> <ul style="list-style-type: none"> • Not clear what ‘urban’ means • Managing playing fields for recreation and nature • Mention school grounds • Changing planning permissions to encourage nature actions. • Guidance for Local Authorities to imbed measures. • U2.2 Include creation of wildlife ponds in urban greenspaces, stag beetle log pyramids etc • Add habitat creation for lepidoptera (butterflies/ moths) under U1. 	<p>Our response</p> <ul style="list-style-type: none"> • We agree that ‘urban’ can be interpreted in different ways. In this LNRS, it broadly means settlements and includes any hamlet, village, town or city. • We agree that introducing more nature into the corners and edges of playing fields without compromising their recreational uses, can only be implemented in some locations. This is already acknowledged in U1.1 in the ‘Where’ column which refers to opportunities. • Regarding schools, core measure U2.1 specifically refers to increasing biodiversity in school grounds. See D5 for why school grounds cannot be mapped. • Regarding changing planning permissions, this is out of scope for the LNRS, but two enabling measures U1.7 (EM) and U1.9 (EM) relate to this. • The list of nature interventions in U2.2 is not exhaustive. Links to further guidance have been provided. <p>Actions</p> <ul style="list-style-type: none"> • To clarify what is meant by urban, Priority U1 wording has been amended to: <i>“Create and connect new wildlife rich are in our villages, towns and cities...”</i> • Through the delivery phase we will be helping Local Planning Authorities to embed the LNRS in their local plans and decision making. • U1’s second outcome statement: examples of interventions for nature now includes <i>“Butterfly banks and butterfly/moth gardens and meadows”</i>.
<p>38. Swift bricks and artificial nest cups</p> <ul style="list-style-type: none"> • Use specific wording • Encourage their use in new developments 	<p>Our response</p> <ul style="list-style-type: none"> • We received many requests to include text from NPPG Natural Environment 2025 paragraph 017 to ensure suitable numbers of swift bricks, a universal nest brick for a range of small bird species, are included in new developments. • Adopting planning policies that include installation of swift bricks was already mentioned in Part 2 Section 4 U2.6 (EM). While nesting boxes generally were featured in U2.2 and FL1.4, new wording has been added to highlight that swift bricks can be used by other bird species. <p>Actions</p> <ul style="list-style-type: none"> • Wording added to Measure U2.2 and FL1.4 <i>“Note: Swift bricks are considered a universal fix for small cavity-nesting bird species as they will also be used by house sparrows, starlings, great tits, blue tits and occasionally house martins and nuthatches.”</i>

<p>39. Nature networks priorities and measures</p> <ul style="list-style-type: none"> • Wildlife-rich habitat has a specific meaning which was not intended • Expand on why Nature Networks priorities and measures needed • Build on the theme of connectivity through more technical language 	<p>Our response</p> <ul style="list-style-type: none"> • In the draft documents, we described Nature Networks as “<i>Protected sites, wildlife corridors & more wildlife-rich habitat</i>”. ‘Wildlife-rich habitat’ has a specific meaning in government guidance, but it was not our intention to use this terminology in that context. Wording has been changed to avoid this. • The Nature Networks’ priorities and measures aim to help achieve <i>Principle 2: Create a network of bigger, better, more and joined-up wildlife-rich places</i>. Introductory copy explains why Nature Networks priorities and measures are needed in addition to those developed for habitats. Some improvements have been made to this explanation. • Some responders requested more technical terms such as “<i>multi-functionality</i>” and “<i>stepping stone ecology</i>” to expand on the theme of connectivity and support practitioners developing Nature Networks on the ground. <p>Actions</p> <ul style="list-style-type: none"> • Nature Networks description changed to: “<i>Protected sites, wildlife corridors & more habitat for wildlife</i>”. • The introduction to Nature Networks has been changed so that it is more detailed and technical. • In the Nature Network measures, wording has been tightened to ensure that habitats created here are the types prioritised by this LNRS, so that implementing Nature Networks measures supports all other measures.
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<p>40. Nature and health priorities and measures</p> <ul style="list-style-type: none"> • Need to help people connect with nature • More emphasis on accessing nature in a responsible way – e.g. Issues with dog walking and recreational disturbance • Emphasise car-free and equitable access to nature • Define accessible in terms of green space • Other measures overlap with NH1 which are linked to people and health e.g. community orchards, street trees etc. 	<p>Our response</p> <ul style="list-style-type: none"> • While the importance of connecting people to nature is underscored within this LNRS, its statutory purpose is to not to achieve this. Rather, the LNRS is a tool to help target the best places for habitat creation and improvement that can meet ecological and wider environmental goals. The LNRS, however, does mention many of the organisations and groups who already help to connect people to nature in the Strategy area and we will be considering how to further signpost to these and others in the delivery phase of the LNRS. • We appreciate that responders are concerned about recreational disturbance (such as dog walking, trampling etc.) to areas of nature. While prevention is out of scope of the LNRS, we will consider if and how responsible access to nature can be encouraged as part of the LNRS delivery phase. • While we acknowledge the benefits of accessing nature via routes that are equitable and car free, the LNRS cannot influence transport policy. <p>Actions</p> <ul style="list-style-type: none"> • Accessible greenspace has been added to the glossary using the definition developed by Natural England. • References to the other core measures that overlap and support NH1 have been added including W2.2, W3.1, W3.3, Cor2.2, Cor 2.3 and Cor 3.5
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C. Local Habitat Map

Summary of key feedback	Our response or actions
<p>1. Level of detail</p> <ul style="list-style-type: none"> Other GIS layers should be added Concern why some datasets have not been used – e.g. ‘Trees Outside Woodland’ 	<p>Our response:</p> <ul style="list-style-type: none"> The LNRS is not intended to be a collation of all datasets available for Sussex habitats and species. As per the statutory guidance, it uses data alongside expert knowledge to help target effort in the short to medium term to where it could deliver the greatest benefit for nature and the wider environment. Developing the Local Habitat Map was a challenging exercise limited in many cases by a lack of reliable data, as well as by a specific requirement in the statutory guidance that the LNRS must not ‘<i>indiscriminately</i>’ map areas but be selective in its targeting. To prepare for the LNRS, the Sussex Biodiversity Record Centre (who developed the Local Habitat Map with the LNRS team) undertook an audit of all available datasets for each priority habitat and identified a level of confidence in the accuracy of each. This audit included woodland and trees datasets, national and local, such as Defra’s ‘Trees Outside Woodland’ map. When developing LNRS mapping, the team and advisory groups agreed a ‘mapping approach’ including that datasets should not be used where these were not deemed sufficiently accurate for the purposes of the LNRS given the risk of misleading users. ‘Trees Outside Woodland’ is an example of a dataset not felt to be accurate enough to inform this LNRS. We recognise that the wording of W2.1 includes the phrase “<i>trees outside woodland</i>” but this wasn’t intended to refer to the dataset but to the general creation of more single trees/small groups of trees outside woodland. <p>Actions:</p> <ul style="list-style-type: none"> Improve signposting to Part 4 – Supporting technical detail, which details the process used to develop the Local Habitat Map and which datasets could and couldn’t be used and why.

<p>2. Accuracy of mapping</p> <ul style="list-style-type: none"> • Doesn't use all available datasets • Doesn't reflect responders' own knowledge of the area 	<p>Our response:</p> <ul style="list-style-type: none"> • The accuracy of the Local Habitat Map is limited by the accuracy of the spatial datasets available for the habitats on the ground. National datasets contain many errors, hence many of the best available datasets used in the LNRS were those created locally by the Sussex Biodiversity Record Centre who have expertise in collating and analysing biodiversity data for Sussex. However, even these may still not be perfect. • Ideally, all spatial datasets for all habitats featured in the LNRS would be ground-truthed but this was not possible due to time/resource constraints. However, the team will take note of any inaccuracies reported through the consultation, and it is hoped that as work commences on LNRS delivery, inaccuracies will be identified and fed back to the LNRS team to be dealt with in its review. • The datasets and criteria used to develop the Local Habitat Map and its APIB and ACIB layers are detailed in Part 4 – Supporting technical detail of this LNRS. <p>Actions:</p> <ul style="list-style-type: none"> • Any feedback on accuracy of datasets will be passed to Sussex Biodiversity Record Centre for consideration in relation to updating/review of the data they hold. • A list of datasets to be prioritised for the next LNRS will be created following publication of this version.
<p>3. Buffers</p> <ul style="list-style-type: none"> • Too big • Too small • Not around all Protected Sites 	<p>Our response</p> <ul style="list-style-type: none"> • A buffer is a landscape feature used to protect a sensitive area from the impacts of development or other harm. Buffers have been applied in three places: around rivers and streams (Measures R1.6, chalk streams R2.1, and protected sites PS1.2). • When buffers were mapped in the Local Habitat Map, this was not identified on a site-by-site basis due to time and resource constraints but applied at a standard width that was deemed helpful to support habitat creation and improved ecosystem function. Given this, there may be some inaccuracies in the width of the buffers at specific locations. • The buffers for protected sites had only been applied to those within Biodiversity Opportunity Areas (BOAs) to reflect the greater opportunities in these areas to connect to existing priority habitats. However, many consultees found this confusing as to why buffers were around some protected sites and not others. <p>Action:</p> <ul style="list-style-type: none"> • Buffers have been added to all protected sites, not just to those within BOAs.

<p>4. Number of mapped measures</p> <ul style="list-style-type: none"> • Number of unmapped measures surprising/ concerning • Most farmland and urban measures not mapped 	<p>Our response:</p> <ul style="list-style-type: none"> • Part 2 of the East Sussex and Brighton & Hove LNRS contains 106 measures (actions for nature) that if undertaken, can deliver the strategy's priorities. Where possible, the Local Habitat Map shows where these measures can be implemented across the strategy area to deliver the greatest benefit for wildlife and the wider environment. • Many measures (approx. 60%) could not be mapped however. This is because: <ul style="list-style-type: none"> ○ they didn't meet criteria in the statutory guidance, ○ they couldn't be mapped accurately based on the best available data, or ○ a combination of both. • A restriction in the statutory guidance means many urban and all farmland and soil measures can't be mapped because they are beneficial over a wide area rather than specific locations. In the example of farmland measures, creating species-rich strips, planting new field trees, providing nesting boxes etc. could feasibly be implemented on any farmland. • An example of a measure that couldn't be mapped due to limitations in the available data is Scr1.1 '<i>Create and enhance successional and scrub habitats...</i>'. As there is no existing dataset for scrub in Sussex, it is not possible to map existing scrub for enhancement. • Where measures are not mapped, this doesn't make them any less useful or important to nature's recovery. <p>Actions:</p> <ul style="list-style-type: none"> • Improve signposting to Part 4 – Supporting technical detail which lists the measures that could not be mapped and why.
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<p>5. Mapping in urban areas</p> <ul style="list-style-type: none"> • Include school grounds • Not all allotments mapped 	<p>Our response:</p> <ul style="list-style-type: none"> • The importance of nature in urban areas in Sussex was flagged as a priority by many stakeholders. We acknowledge that many greenspaces in urban areas hold the potential to support more habitats and play an important role in nature’s recovery in Sussex. • The particular potential of schools/ school grounds was identified during the process, but a dataset is not available for school grounds only (excluding buildings and hard surfaces). Including the entire area of all school grounds would risk over-estimating their potential contribution to nature recovery. Other resources were not available to individually digitise every school greenspace. More information can be found about this in Part 4 – Supporting technical detail • We recognise that allotments can provide opportunities for improvements to nature. Green space datasets, for inclusion in the LNRS as important areas for biodiversity, were agreed with each district council (and with BHCC) individually to ensure they were locally accurate. Allotments have been included where this had been included in the local dataset. <p>Actions:</p> <ul style="list-style-type: none"> • Improving data on urban nature and how it can be used to help target measures will be considered for the next iteration of the LNRS.
<p>6. Access to datasets/layers</p> <ul style="list-style-type: none"> • Providing access to underlying datasets • Providing open access GIS layers. 	<p>Our response:</p> <ul style="list-style-type: none"> • A list of all data sources and how these were used to create the Local Habitat Map’s layers is contained in Part 4 – Supporting technical detail of this LNRS. • For users who want to see a collation of open source datasets available for Sussex, many of these are available on MAGIC and on other data viewers (Forestry Commission; data hub used by catchment partnerships). • Users can also contact the Sussex Biodiversity Record Centre to obtain available habitat and species data for a particular site. <p>Actions:</p> <ul style="list-style-type: none"> • Improve signposting to Part 4 – Supporting technical detail and the list of open source datasets available for Sussex for publication. • Once the LNRS has been published, mapped layers will be made available as open access GIS layers.

<p>7. Are unmapped areas at greater risk of development?</p> <ul style="list-style-type: none">• Confusion about what being mapped means	<p>Our response:</p> <ul style="list-style-type: none">• We recognise the value local people put on areas of nature around them and the desire to protect these from pressures. This sentiment came through strongly in the consultation.• However, the LNRS does not (and was never intended to) provide any additional protection for sites beyond existing protections through designations or the planning process. Rather the purpose of the LNRS is to target action to deliver more/better habitats on the ground. However, local planning authorities will have to have regard to the LNRS in local plan making processes. They will also have to work to an extended biodiversity duty to 'conserve and enhance' biodiversity. See also E6 <p>No action.</p>
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<p>8. Requests for sites to be added or removed from the Local Habitat Map</p> <ul style="list-style-type: none"> • Add a site • Remove a site • Revise the boundary • Remove measures from SSSIs (Natural England request) • Add new designated area in East Sussex 	<p>Our response:</p> <ul style="list-style-type: none"> • Landowners, land managers and interested parties requested changes to the Local Habitat Map. These were considered on a case-by-case basis. • Broad types of comments included: <ul style="list-style-type: none"> - Requests to add sites to the mapping of measures. - Requests to remove sites from the mapping of measures (very small number). - Requests to revise boundaries of some proposed corridors (due to updated ground-truthing, new data etc). • Nearly half of email responses requested that one specific site in Hastings be added to the APIB. Unfortunately this site does not meet the very tightly prescribed criteria set by Defra to be part of the APIB, which is limited to <u>protected sites</u> and <u>irreplaceable habitats</u>. • In addition, we received specific requests from Natural England: <ul style="list-style-type: none"> - Request to remove some measures from international designated sites where these relate to habitat creation (leaving those which relate to enhancement of existing habitats). - Request to add new designated area in East Sussex to the APIB (Seven Sisters NNR) following its recent declaration. <p>Actions</p> <ul style="list-style-type: none"> • Changes were applied where information provided was sufficiently detailed (and where the respondent was the landowner or land manager). Note that some responders were asked to provide additional information but did not do so, hence their request was not made. More detail about changes to the Map will be found in the published version of Part 4 – Technical Methods. • In relation to the Natural England request, all measures that had been mapped within SSSIs were removed due to potential overlap with existing management agreements for these sites. This was with the exception of the following: in international SSSIs/NNRs, measures which relate to enhancement of existing habitats only were mapped (i.e. no measures for creation of new habitats were included as these could conflict with proposed management agreements whereas enhancement of existing habitats should not).
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D. Prioritised Species list and species measures

Summary of key feedback	Our response or actions
<p>1. Priority Species list development</p> <ul style="list-style-type: none"> • Confusion about how the list was developed • Access to the longlist. • Some species are not present in the area. • Update list in line with latest Natural England’s Threatened Species Recovery Actions baseline 2025. 	<p>Our response:</p> <ul style="list-style-type: none"> • The creation of a longlist of 877 species for East Sussex and Brighton & Hove, and subsequent prioritisation to just 160 individual species, is set out in Part 3 Section 4. This followed guidance set out by Defra called ‘<i>Species Recovery within Local Nature Recovery Strategies Advice for Responsible Authorities</i>’ (hereafter referred to as ‘Species Advice’) and was based on an assessment of local records and the requirements of individual species, with input from local experts. • There was some confusion over why some species, which are rare, legally protected and/or for which Sussex is known to be important, had not been prioritised. In many cases, the measures for habitats set out in Part 2 were considered sufficient to support them, and as such, 320 species were assigned to ‘category A’ as per the ‘Species Advice’. Category A applies to species that are likely to markedly benefit from the general creation, expansion and improved connectivity of good quality habitats in the strategy area and do not need to be singled out for specific LNRS measures, and to species with high recovery potential that do not require specific or targeted recovery measures. • Natural England published their Threatened Species Recovery Actions 2025 baseline in August 2025, which was taken into account prior to the public consultation. <p>Actions</p> <ul style="list-style-type: none"> • Part 3 Appendix 3A has a list of all 877 species that were considered (longlisted), whether they were shortlisted, and which measures will support those assigned ‘category A’. We are considering if this can be better signposted and/or provided in a more accessible format for publication.

Summary of key feedback	Our response or actions
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2. Priority Species list format

- Priority list too long
- Some species names are incomplete.
- Species should be mapped.

Our response

- While we acknowledge that the list of Priority Species is long, the fact that it comprised 160 species (from a longlist of 877) reflects the richness of biodiversity found in East Sussex and Brighton & Hove.
- A list of Priority Species that comprised 19% of the longlist was achieved by following the Species Advice and input from local experts. A further 37% of species found on the longlist are supported by habitat measures. It was not possible to prioritise further without giving the impression that some species are potentially more important than others.
- Some species of spider, wasp and lichen do not have common names and so only their scientific names have been provided.
- We have not mapped species as this would more likely reflect recorder effort, rather than the most important places for them. However, Part 3 includes notable locations for each priority species where known, and Part 2 includes tables of all those priority species and priority species assemblages that would benefit from the priorities and measures.

No action

3. Requests to add species to the Priority Species list

Our response

- Through the consultation, many requests to add species to the Priority Species list or species longlist were received. All were considered.
- Some of the species proposed e.g. **silver-studded blue, barn owl, early spider orchid, marsh gentian, kestrel, herring gull, *drosera rotundifolia*** and others, were on the longlist but not shortlisted as habitat measures were considered to be sufficient to support them (category A). Other species on the longlist were not deemed to be a priority for on-the-ground action as they are relatively common in Sussex, e.g. **greenfinch, house sparrow, song thrush.**
- Other species did not meet the criteria for the longlist. For species like **badger, willow warbler, purple emperor, common pipistrelle** and others, this is because they have been assessed as species of Least Concern (not at risk of extinction in the wild) by the International Union for the Conservation of Nature (IUCN). Other species did not make the longlist because they are not found in Sussex e.g. ***Andrena tarsata*** has not been recorded in Sussex since 2009.
- The below listed species, however, have now been added to the Priority list following responder comments and the provision of new information.

Actions:

- **Adder.** There were many requests to add adder to the list of Priority Species, as an iconic species of the Downs and as a counter to false negative narratives about it. The Sussex and Amphibian Reptile Conservation Group provided additional information on the current conservation status of the species (adder have declined and disappeared from many areas of the UK in recent decades being declared extinct in some counties, with 90% of remaining adder populations in decline with the species being on the brink of extinction), and highlighted growing evidence that adders are having to alter their behaviour due to the impacts of climate change. Whilst we are confident that many of the habitat measures will support adder if implemented, it is acknowledged that additional bespoke measures are required, such as the construction of hibernacula. The adder has therefore been added to the shortlist.
- **Pearl-bordered fritillary.** Butterfly Conservation highlighted that the species requires additional and specific bespoke measures in addition to those listed for woodland habitats. The species has therefore been added to the shortlist with the measures recommended by Butterfly Conservation.

- **Medicinal leech.** A request by a local expert was made to include medicinal leech to the shortlist for East Sussex and Brighton & Hove. Whilst this species was not on the original longlist (as it did not meet the criteria), there are only four main populations remaining in the UK, with an outlying population at Rye. The species has therefore been added to the shortlist with bespoke measures.
- **Western barbastelle.** At the time of the public consultation, this species of bat was not prioritised for East Sussex and Brighton & Hove as there were very few confirmed records of this species in the LNRS area. Since the time the shortlist was first made, the number of records has increased, largely as a result of surveys carried out to support planning applications. These records indicate that the LNRS area may be more important for the species than originally thought. As such the species has been added to the shortlist for East Sussex and Brighton & Hove and a new assemblage added - Woodland bats - including barbastelle and Bechstein's bat, aligning with the LNRS for West Sussex.
- **Brilliant emerald.** There were several requests for additional dragonfly and damselfly species to be added to the shortlist. As a result, further discussions were held with the County Recorder for dragonflies and damselflies. It was considered that black darter and small red damselfly are likely to be supported by habitat measures for heathland, but it was requested that the habitat measures should be amended to make specific reference to heathland ponds; the habitat measures have been amended accordingly. Brilliant emerald is a national rarity, with East (and West) Sussex being key areas. It was also felt that additional bespoke measures were required for this species over and above habitat measures. Brilliant emerald has therefore been added to the shortlist.

<p>4. Requests to remove species from the Priority Species list</p>	<p>Our response</p> <ul style="list-style-type: none"> • A smaller number of comments requested that species be removed from the Priority Species list. This was because responders felt the species in question was either too common in the LNRS area, or too rare, or because they felt the species could not or should not be conserved. • Glistening Waxcap, Jubilee Waxcap and Golden-gilled Bolete (felt to be too rare and not able to be conserved) - Sussex is known to be important for waxcap grasslands, and we have seen from experience that sensitive management of sites can support their recovery. Golden-gilled bolete is a species of wood pasture and parkland, and again, sensitive management of its habitat can support its recovery. • Starling (felt to be too common) - shortlisted because it is a common but declining resident and Sussex holds c. 21% of the GB population, with the murmurations they form considered to be iconic, especially in urban locations. Breeding pairs of Redshank (too common) meanwhile have declined more steeply in Sussex than nationally, and wintering numbers are also declining. • Beaver and pine marten (should not be conserved) - We acknowledge that species reintroductions must be carefully considered. However, there is a lot of interest in the potential for both beaver and pine marten reintroduction in Sussex, with active partnerships looking into the feasibility. Their reintroduction could help deliver and/or support many of our habitat measures and so have been prioritised within the LNRS. <p>No action</p>
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5. Amphibians and reptiles

- Representation in the strategy
- Changes to Species measures

Our response:

- Through the consultation, many responders voiced concern that amphibians and reptiles were not fully reflected in the LNRS.
- Some comments requested that more of these species should be added to the Priority Species list. In this LNRS **Great crested newt** and **common toad** were shortlisted, but no reptiles as it was considered that these and other amphibian species would be supported by habitat measures. This has now changed with the inclusion of **Adder** ([see D3](#))
- Other comments requested that wording be added to the habitat measures in Part 2, to reflect their benefit to amphibians and reptiles. Restoration and enhancement of these habitats will benefit a whole range of species, and it is not possible to reference all of them. However, links to amphibian and reptile guidance has been added where relevant.
- Other comments requested changes to **Amphibian Ponds Assemblage** measures. We accept that although great crested newt and common toad have been grouped into this assemblage, their requirements may be different. Grouping them this way was to try and reduce the number of individual priority species measures, as per our Species Advice criteria. However, we have tried to accommodate the requirements of both species in the assemblage measures.
- We also acknowledge that pond scrapes benefit all species of amphibians.

Actions:

- Links to the Reptile Habitat Management Handbook have been added to a number of habitat measures (including farmed landscape & soils, species-rich grasslands, woodlands, hedgerow & scrub, lowland heathland & sandstone outcrops) and Part 3 Appendix 3A has been amended to show that amphibians and reptiles in particular will also benefit from nature network measures (which aim at increasing connectivity and expanding our protected sites).
- In the Amphibian Ponds Assemblage, we accept that toad patrols and signage (referenced as an enabling measure) can be important locally but should not be the only solution. A new enabling measure has been added: *“develop planning policy/guidance on modifying kerbs/gully pots, installation of tunnels/culverts etc at key amphibian locations”*.
- *“Scrapes”* have been added into the second measure to highlight their benefit to all species of amphibians.

<p>6. Fish</p> <ul style="list-style-type: none"> Few on list; more fish should be prioritised 	<p>Our response:</p> <ul style="list-style-type: none"> Unfortunately, freshwater fish are under-recorded, especially in East Sussex, and as such, we did not have the data to assign many to either the long or priority lists. Despite that, two species have been prioritised for East Sussex and Brighton & Hove. <p>No action</p>
<p>7. Changes to Species measures</p> <ul style="list-style-type: none"> Protect bat roost sites already given statutory protection. Consider a wider range of measures - not just for gardens Model planning policies and conditions are required to support hedgehog Consider Ark sites for white-clawed crayfish 	<p>Our response</p> <ul style="list-style-type: none"> Bats - Whilst bats and their roosts are legally protected, the presence of roosts may only come to light during planning applications. Notifying landowners of the presence of roosts will aid their protection, which is considered to be one of the most important measures required for conservation of the species. No action. Hedgehogs - measures provided are predominantly those that can be taken in an urban environment. This is because relatively little is known about the status of rural hedgehog populations, so we do not know what or if any, specific measures would be required. Due to this, we have recommended an enabling measure (4) to research rural populations, though this action is outside the scope of the LNRS. We also consider that the habitat priorities and measures in Part 2 are likely to support rural hedgehog populations. No action. Hedgehogs - While the development of model planning policies and conditions is outside the scope of the LNRS, we had included an enabling measure (5) to develop planning guidance. It is worth noting that hedgehogs are specifically referenced in the National Planning Policy Framework (NPPF) as a species to be protected. No action. White-clawed crayfish - Ark sites are isolated new refuge sites where new populations of species such as white-clawed crayfish can be established, safe from threats. We accept that given their very limited distribution and the pressures on white-clawed crayfish, consideration to the establishment of 'ark' sites should be added as a measure. Action.
<p>8. Plant species, seed collection and propagation</p> <ul style="list-style-type: none"> More emphasis on rare wildflowers and seed propagation Moon Carrot - collecting seed and scattering 	<p>Our response:</p> <ul style="list-style-type: none"> The longlist included 284 wildflower species. Short-listing was guided by the Species Advice with input from local experts. 122 species were considered to be supported by habitat measures and were therefore not added to the Priority Species list. Whilst it's not illegal to collect seed from most wildflowers, there are some exceptions (for example, seed collection within an SSSI is not permitted without a licence). Advice on seed collection and propagation can be sought from the Millenium Seedbank at Wakehurst. <p>No action</p>

<p>9. Pressures on species: INNS control and predators</p>	<p>Our response</p> <ul style="list-style-type: none"> • We acknowledge responders concerns about the pressure on Sussex species by invasive non-native species (INNS). Whilst some species measures make specific reference to the control of INNS (e.g. crayfish and water vole), there is greater reference to the control of INNS in Part 2 as part of the habitat measures. (See: C1.4, C1.5, G1.1, G1.3, G1.6, W1.2, W1.3, W1.9, H1.1, H1.2, R1.8, Wt1.3, U2.4.) • We recognise that while it is important to include measures on predator control, the primary action for species recovery is landscape restoration, hence why the statutory focus of the LNRS is on habitat recovery and why we have included measures for both specific habitat types and nature networks in the strategy. • While additional protections for species are out of scope of the LNRS, we have included protection from disturbance and predators via wardening as an enabling measure in the coastal habitats assemblage, stating that wardening “<i>is key</i>” to success. Additionally, measures for other species, refer to the need for monitoring and education to inform conservation efforts. <p>No action</p>
<p>10. Role of local recorders</p>	<p>Our response</p> <ul style="list-style-type: none"> • The role that community groups and individuals play in monitoring species and habitats is recognised and greatly valued. We encourage the submission of species records to the Sussex Biodiversity Record Centre (records from iRecord are passed on to them too) as this helps to build up our local evidence base and supports species conservation in the future. <p>Actions</p> <ul style="list-style-type: none"> • A section has been added to Part 1, Section 2.10 which details the importance of, and the ways in which everyone can contribute to nature recording.

11. Species re-introductions

- Beaver and pine marten should not be on the list
- Water vole measures should consider reintroductions
- Beaver measures should account for reintroductions
- Pine Marten measures do not reflect the effort and training required to implement them.
- Future reintroductions: Red-backed shrike and Black-veined white should be prioritised

Our response:

- Advice from Natural England is that reintroductions for species should not be considered without robust evidence for their need. As such, we have included only two species which are currently absent from the LNRS area (beaver and pine marten) as there are active local partnerships exploring the feasibility of their reintroduction. However, reintroduction to new sites has been noted as a possibility for some other species.
- Re: **Beaver** introductions, whilst this is not specifically stated, measure 1 relates to habitat improvements to support future establishment and measure 2 (enabling measure) is required for any future reintroductions, with wording provided by Natural England.
- **Pine Marten** has an enabling measure (2) about training and guidance. This was added on the advice of Natural England, in the light of the current project underway to explore the feasibility of reintroducing pine marten to Sussex and Kent (as noted in the information section). The implementation of this measure lies out of scope of the LNRS, hence being an enabling measure. Who would deliver this training will likely be explored through the existing project/partnership. The focus is to improve connectivity of suitable habitat (as per measure 1).
- Although local populations of **water voles** are critically low, they are present in the LNRS area. While future iterations of the LNRS may need to consider reintroductions, necessary habitat restoration and mink control is required first.
- **Red-backed shrike** last bred in Sussex in 1968. Knepp is currently investigating the feasibility of reintroducing the species given the presence of scrub habitats in the area. The results of this study have not yet been published and Sussex species experts advised that it should not be added to the Priority Species list at this time given that the species is a scarce migrant and is in a genus for artificial reintroduction/population recovery programmes have been unsuccessful. Its inclusion in the document can be revisited in future versions of the LNRS once the findings from the Knepp study are available.
- **Black-veined white** became extinct in the British Isles around 1925. It was always considered a rarity here but is often very common on the continent. It is therefore of low conservation priority.

No action

12. Wildlife rescue and rehabilitation organisations

Our response:

- We are very grateful to the work of wildlife rescue and rehabilitation organisations who play a vital role on the frontline of nature recovery.

Actions:

- An additional paragraph has been added to Part 3, Section 3 Species Recovery, to recognise the work of these organisations.

E. Delivery and implementation

Summary of key feedback	Our response or actions
<p>1. Funding</p> <ul style="list-style-type: none"> • Clarity needed in relation to funding • Lack of funding generally for nature’s recovery • Concern that without funding, the LNRS cannot be delivered. 	<p>Our response:</p> <ul style="list-style-type: none"> • We recognise the LNRS lacks information on delivery and funding. In part, this is because it is intended to be a high-level strategy and not a delivery or action plan, which will follow in the delivery (implementation) phase. • Additionally, the LNRS is only directly linked by government to two delivery mechanisms (BNG and a strengthened biodiversity duty for public bodies). This is a source of concern that is recognised by the LNRS team. • The LNRS is, however, a strategic framework to help organisations and groups coordinate and make decisions on projects and to prioritise available funding. While it is not in itself a funding mechanism, it is an agreed statement of priorities. It is therefore hoped that the LNRS can be used positively by groups seeking funding for projects and initiatives which help to deliver LNRS actions. We are also hopeful that it supports access to schemes like Environmental Land Management (ELM) which would help farmers and land managers take positive action for nature. • We acknowledge there has been change and uncertainty around environmental funding for farmers and land managers. Where possible, the measures tables in Part 2 include links to ELMs options within the further info/guidance column (though we’re aware that since consultation, some SFI and CSHT options listed have been withdrawn and others have changed or have yet to be relaunched). It is hoped that government will do more to assist farmers in funding actions that are set out in their LNRS via emerging agri-environment schemes. <p>Actions:</p> <ul style="list-style-type: none"> • The LNRS team aims to develop additional guidance around funding for key groups as part of the delivery phase. This includes working with land management and farming representatives to create bespoke materials with emphasis on how measures can link to funding options.

Summary of key feedback	Our response or actions
<p>2. Monitoring</p> <ul style="list-style-type: none"> • More clarity needed • How will this work 	<p>Our response:</p> <ul style="list-style-type: none"> • Defra is currently working with Responsible Authorities (RAs) on a monitoring framework for all Local Nature Recovery Strategies, so it was not possible to include details of this at time of writing. • It is likely that the Defra approach will focus on monitoring <i>what</i> activity is happening in <i>which</i> area, rather than monitoring the change to biodiversity at sites, as the latter requires baseline evidence. • The RAs will be working with partners to develop the monitoring approach locally and more information will follow once available. <p>Actions:</p> <ul style="list-style-type: none"> • Once more information is known about monitoring, it will be shared on the Sussex Nature Recovery website.
<p>3. Implementation</p> <ul style="list-style-type: none"> • More clarity needed re targets, timings, commitments, accountability • The need for an implementation plan 	<p>Our response:</p> <ul style="list-style-type: none"> • While detailed delivery plans, and timings, targets and commitments go beyond the scope of the current strategy document, we acknowledge that respondents are keen to understand how implementation will work in practice. • More information relating to implementation will emerge within the delivery phase and will be communicated then. • Some consultees expressed concerns about wider national policy direction; we have recorded these and will feed them back through appropriate channels.” <p>No action.</p>

<p>4. Enforcement powers ('teeth')</p> <ul style="list-style-type: none"> • Tackle pressures on nature like development or pollution. • Compel landowners to act. 	<p>Our response:</p> <ul style="list-style-type: none"> • We acknowledge the concerns raised through the consultation, and the considerable distress felt by local people about the many pressures on nature and its ongoing loss in East Sussex and Brighton & Hove. Of these pressures, pollution and development were cited most. • Many of the pressures on nature are regulated through processes that the LNRS does not have influence over (e.g. water pollution, air pollution, agricultural practices etc). We acknowledge that this is a frustration. <p>What the LNRS can't do</p> <ul style="list-style-type: none"> • The LNRS cannot provide new-designations for habitats, species, or places. It does not have a mandate to identify how best to improve existing national designated sites for nature (SSSIs, NNRS) as this sits under a different system. The scope of the LNRS is therefore constrained by the portion of the overall system it can 'talk to'. • It also cannot compel farmers and landowners to act. <p>What the LNRS can do</p> <ul style="list-style-type: none"> • Local Planning Authorities are now required to "take account of" their local LNRS when developing a Local Plan, Minerals & Waste Plan or other Supplementary Plan. New Strategic Development Strategies (SDSs) will have to take account of the LNRS once additional legislative provisions come into force later in 2026. The intention is that nature recovery and Nature-based Solutions are properly considered alongside other land-use needs. • This means the LNRS has a new role in planning that was not there before. Additionally, local people can use the LNRS to understand why their local area might be important for nature and use this knowledge to influence local decisions where they can. • In terms of pressures from land use and agriculture, the LNRS identifies habitat opportunities and offers guidance. While participation by farmers and landowners is voluntary, we are hopeful that it can support access to schemes like Environmental Land Management (ELM) which would help them take positive action for nature. • In summary, as an approach the LNRS relies on collaboration, incentives, and voluntary action from landowners and land managers to achieve nature recovery goals. It also provides all interested organisations and individuals with opportunities to make proactive choices to recover nature across our strategy area. <p>No action</p>
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<p>5. Responsibility for delivery</p> <ul style="list-style-type: none"> Lack of clarity around ownership of delivery 	<p>Our response:</p> <ul style="list-style-type: none"> East Sussex County Council was appointed the Responsible Authority (RA) to prepare a Local Nature Recovery Strategy for the area of East Sussex and Brighton & Hove. Post LNRS publication, and as per the legislation and guidance, there is no direct accountability or responsibility for delivery of the 48 strategies prepared across the country. More recent responsibilities have been identified for the RAs by DEFRA, to help ‘enable’ the delivery of the LNRS. This may be through functions such as helping to develop projects with local partners and ensuring the LNRS is taken account of in local decision-making. We understand the frustration that this lack of ‘ownership’ of these strategies may create. Rather, delivery will rely on collaborative action by organisations and groups across sectors in the strategy area. We are optimistic that with the level of stakeholder engagement carried out, there is strong partner and stakeholder commitment behind this LNRS to support its delivery. The LNRS is a shared strategy (rather than top down), which contains something for everyone who is interested in helping nature to use. There is a very active community of organisations across Sussex already engaged in the LNRS and in actions to support nature’s recovery. Many others who would like to do more. The LNRS is therefore a very helpful new resource which can be used to help target efforts, identify where collaboration and partnership could be focused to best effect and provide an important understanding of how action – at even the smallest scale – can make a contribution to a bigger, strategic approach to delivering more for nature in East Sussex and Brighton & Hove. <p>No action</p>
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<p>6. Relationship to existing plans (e.g. Local Plan, NPPF) and the planning process</p>	<p>Our response:</p> <ul style="list-style-type: none"> • Details on how the LNRS integrates with existing planning frameworks are missing from the draft LNRS. At the time, this was because information from government and updates to existing frameworks such as the National Planning Policy Framework (NPPF) were pending. • In March 2026, government published updated guidance on how the LNRS will impact Local Plans under the Levelling-Up and Regeneration Act 2023. A key change is that all Local Plans, Minerals & Waste Plans, and Supplementary Plans in England will now be legally required to “take account” of relevant Local Nature Recovery Strategies. This legal duty will sit alongside policy requirements in the forthcoming revised NPPF, expected this summer, with updated Planning Practice Guidance to follow later in the year. • Local Planning Authorities are now required to “take account of” their local LNRS when developing a Local Plan, Minerals & Waste Plan or other Supplementary Plan. The new Strategic Development Strategies (SDSs) will have to take account of the LNRS once additional legislative provisions come into force later in 2026. The intention is that nature recovery and Nature-based Solutions are properly considered alongside other land-use needs. • This means the LNRS has a new role in planning that was not there before. Additionally, local people can use the LNRS to understand why their local area might be important for nature and use this knowledge to influence local decisions where they can. <p>Actions:</p> <ul style="list-style-type: none"> • The LNRS team will be working through the above with local authorities in our strategy area, as well as with government agencies. • Specific guidance for planning authorities will be created – this is likely to be in the form of supplementary materials rather than changes to wording in the published LNRS documents to more easily enable updates to information as new guidance comes out. • Information will also be shared with the public via the Sussex Nature Recovery website.
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<p>7. Will the LNRS make a difference?</p> <ul style="list-style-type: none"> • General scepticism of LNRS effectiveness 	<p>Our response</p> <ul style="list-style-type: none"> • We understand that lack of progress in the past on nature recovery through government-led approaches has led to a lack of trust in the ability of something like the LNRS to drive change. However, this is the first time we have a locally-led process to flag priorities for nature’s recovery that has some statutory weight. This is progress. • The community of stakeholders and organisations in Sussex that are committed to making a difference for nature is also very strong and so the LNRS can be used to support their work, encourage more collaborative working and ensure resources are used efficiently and effectively. This ‘soft’ use of the strategy is vital and despite worries about its lack of teeth in a ‘hard’/statutory sense – there is significant commitment across Sussex to use this LNRS and that for East Sussex and Brighton & Hove in a way that drives action.
<p>8. What will happen to the LNRS as a result of devolution?</p>	<p>Our response:</p> <ul style="list-style-type: none"> • Sussex is one of a small number of areas in England that has coordinated the preparation of Local Nature Recovery Strategies across two neighbouring LNRS areas (for West Sussex and for East Sussex and Brighton & Hove). The strategies have been drafted and published in a deliberately ‘joined-up’ format. This approach ensures that organisations operating across both areas, (such as the South Downs National Park Authority, High Weald National Landscape, and Sussex Wildlife Trust), can readily understand the overall direction of travel across Sussex and use the strategies more easily to inform their own delivery activity. A further benefit of this approach is that, should devolution proceed as set out in the White Paper and the Responsible Authority role transfer to a future Sussex mayor, whose area would cover the wider Sussex geography, the two strategies can be readily brought together in a coherent and integrated way. • Local Government Reorganisation in Sussex is being considered separately from devolution. While Local Government Reorganisation may create short-term organisational change, it is not expected to have a significant impact on the delivery of the Local Nature Recovery Strategy. LNRS is a devolved statutory duty that will continue to apply regardless of local government structures, and with appropriate transitional arrangements in place, delivery can continue through existing county-level and partnership-based mechanisms. <p>No action.</p>

<p>9. Ongoing engagement/ supporting materials</p> <ul style="list-style-type: none">• Requests for tool kits, webinars, workshops etc.• Specific support for certain groups such as parish councils, farmers and gardeners.	<p>Our response:</p> <ul style="list-style-type: none">• Responders are keen to implement the LNRS and requested additional materials such as case studies, guides and starter kits, to help translate the strategy’s recommendations on the ground. Ongoing engagement was also requested in the form of workshops, webinars, communications and events.• Specific groups needing bespoke guidance and/or support included farmers and landowners (who do not have the time/capacity to become familiar with the strategy, and who may lack financial incentives to change land use), parish councils, and residents who want to improve nature in their local area but don’t know where to start. Additionally, community groups want to know how the LNRS can help them secure funding. <p>Actions:</p> <ul style="list-style-type: none">• The team are very keen to help imbed the LNRS and are considering a range of materials and engagement activities to support the delivery phase. Further details will be posted in due course on SussexNatureRecovery.org.uk.
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